

Reference: 2026-009

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

This request is to ascertain information relating to the SFO's investigation into London Mining Plc.

1. What are the costs to the SFO across each year of the investigation, broken down by year? Please break the costs down, as you have for instance in this release for the case you brought against British American Tobacco. Failing that, please just release the total cost figure, as provided in FOI 2025-019 on Rio Tinto.

2. If held, how many hours were logged on the investigation.

Response

Question 1

The information you have requested is exempt by virtue of Section 22 (1)(a) of the FOIA. This section provides that:

Information is exempt if—

(a) the information is held by the public authority with a view to its publication, by the authority or any other person, at some future date (whether determined or not).

How the exemption is engaged

Section 22 exempts the immediate release of information when it is planned for future publication. As per the SFO's Publication Scheme: [SFO publication scheme - GOV.UK](#), we will be publishing criminal case costs as part of this scheme. The information you have requested is currently being prepared for publication, and will be available in due course, therefore it is exempt under section 22 of the FOIA. For further information, please visit our case costs page: [Criminal Case Costs - GOV.UK](#).

Public interest test

Section 22 is a qualified exemption and requires consideration of the public interest for the exemption to be maintained.

We recognise there is a public interest in transparency regarding how the SFO spends public money to carry out its law enforcement activity. We take steps to meet this interest by publishing comprehensive data annually in our Annual Report and Accounts, and we continue to update the kinds of information we publish in line with the requests we receive.

However, we consider that the public interest in maintaining the exemption outweighs the public interest in disclosure. Case cost information will be published in due course via our Publication Scheme, when complete and accurate figures will be available. Releasing partial or provisional data ahead of the formal publication process could lead to confusion or misinterpretation. There is also public interest in ensuring that official statistics and financial data are released consistently, in context, and following appropriate verification.

More information about exemptions, the precedent effect, and the public interest test is available on the ICO's website: www.ico.org.uk.

Question 2

I can confirm that the SFO does hold this information. However, we judge that section 31(1) is engaged by your request for the hours logged on this case by the SFO.

Section 31(1) 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.*

Section 31 permits the exemption of information from release when the “disclosure of which would, or would be likely to, prejudice certain specified law enforcement matters”. The SFO investigates and prosecutes only the most serious or complex fraud, bribery and corruption. We have a relatively small caseload and disclosing the requested breakdown of hours logged could add to a detailed picture of how the SFO decides to deploy its resources within and between the lifecycle of a case.

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: www.ico.org.uk.

We recognise 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 can be reassured about the general conduct of our organisation and how public money is spent. We therefore release information about specific cases and our methods where possible and where it has been judged that this will not impact our core functions. We comply with our transparency obligations through the publication of case-related material on our website here: [Find an SFO case - GOV.UK](#). We release information regarding our investigations in the [SFO Annual Reports and Accounts](#) in such a way to not undermine any specific investigations or our investigative functions more broadly.

Furthermore, the SFO is publicly held to account more generally through its external communications (including press releases and attendance at public events), [its Annual Reports 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 The SFO also proactively publishes other corporate information, which is available through [our Publication Scheme](#).

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

However, having considered the public interest in releasing this information, we consider that the stronger public interest lies in maintaining the exemption at section 31(1) of the FOIA in relation to the hours logged on this case. Primarily, releasing information of this nature could pose a risk to the SFO's investigative functions; given the highly sensitive nature of the information held as a law enforcement agency, it is essential to safeguard against any such risk. Releasing sensitive information about the hours logged could reveal information beyond how long it took for this investigation to reach closure, allowing individuals to determine the number of staff working on a case, the amount of time it typically takes for the SFO to investigate a case, or the level of prioritisation the SFO gives to certain kinds of cases.

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