

Reference: 2026-069

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

- 1. The number of “self-reports” received by the SFO in each month (or quarter, whichever is more easily retrievable) since January 2022.**
- 2. For the figures in 1, please break this down by the number of self-reports that led to a DPA, a prosecution, no further action, pending or any other recorded outcome.**

Response

We confirm that we hold this information. 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 that is of interest to others, including those we investigate. Releasing detailed information about self-reporting would encourage inferences, due to the small number of such cases and the significant media attention they attract, as to the identity of companies engaged in self-reporting. This would be likely to discourage companies from self-reporting, 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. A significant proportion of SFO investigations arise from corporate self-reporting. Consequently, the encouragement of corporate self-reporting in respect of corporate criminality plays an integral role in fulfilling the SFO's function to investigate and, where appropriate, prosecute serious and complex fraud, including bribery and corruption.

Corporates that become the subject of an SFO investigation commonly attract significant media attention, and disclosure of the number of corporates self-reporting would encourage speculation or inferences as to the identity of companies engaged in self-reporting, particularly given the small number of cases taken on by the SFO and the even smaller number that emanate from self-reports. This speculation would likely discourage companies from self-reporting which they regard as a necessarily confidential process, and this in turn would risk compromising the SFO's investigative capacity 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.