

Audit and Risk Committee

Report title: Compliance report

Meeting date: 18 June 2026

Time required: 5 minutes

Presenter: Louise Byers

RAPID Role: Scrutinise

Publication decision: This report can be published internally and externally without redactions

Problem Statement

Audit and Risk Committee members need to be aware of any compliance issues reported to the ICO via various routes, to ensure that appropriate action is being taken by management.

Input requested

The input requested is confirmation that ARC members are assured that management has responded appropriately to concerns which have been raised during the last quarter.

Background and summary

This report summarises reports of fraud, whistleblowing, insider trading, single tender contract awards during Quarter 4 of 2025/26 (1 January 2026 to 31 March 2026). The report also considers service complaint trends during Quarter 3 of 2025/26 (1 October 2025 to 31 December 2025).

Fraud

No instances of fraud were reported during the period.

In March, the Group Manager participated in a government counter fraud roundtable and a separate counter fraud networking event, both focused on insight sharing and emerging risks. Learning from these events is informing consideration of how fraud prevention arrangements can be further strengthened within the ICO.

Recruitment is due to commence in April 2026 for a new Compliance and Counter Fraud Team Manager to lead the ICO's compliance and counter

fraud activity. The role will focus on proactively identifying areas for improvement, mitigating fraud risk, and maintaining robust control systems that uphold legal, regulatory and internal standards.

Whistleblowing

One whistleblowing complaint was reported during this period, and this is under review.

Inside Information and Insider Dealing

Insider lists are being maintained in line with the Inside Information policy (published December 2025). No reports of concerns about insider trading were made during this period.

Single tender contract awards

The Audit and Risk Committee receives a report at each of its meeting regarding any single tender contracts over £50k. During the quarter there have been three single Tender Award contracts over £50k awarded – further details are provided in Annex 1.

Service complaint trends

Annex 2 provides a quarterly performance briefing on the corporate processing and consideration of service complaints and reviews.

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Sign off: Louise Byers