

# Performance and Impact Report

Q4 2025/26

# Measuring our performance and impact

Measuring our performance and the impact of our work is at the heart of what we do. We ensure that our delivery is focused on outcomes and impacts, and monitor how we achieve this through qualitative and quantitative measures.

This enables decision-making and the efficient allocation of our resources, ensuring value for money. It also provides important opportunities for learning, and publishing this information aids our transparency and accountability.

The [Data \(Use and Access\) Act 2025](#) (DUAA) updates our duties with respect to the interests of data subjects and controllers, amongst other things, as well as having requirements in relation to future strategy, analysis of performance and reporting. We are also subject to the [Growth Duty](#) and have made a series of [commitments](#) in support of growth.

This report on our performance and impact builds on a set of KPIs that are linked to the objectives in our existing strategy, ICO25. It also anticipates some of our future reporting requirements, and we will continue to refine the contents as we work to deliver a new corporate strategy to supersede ICO25 and meet our obligations under the DUAA.

## **Enduring performance measures**

Drawing on our principal objective as updated in the DUAA and our obligations with respect to data subjects and controllers, the table below presents a number of enduring performance measures, which overall demonstrate positive progress.

Measure	2023/24	2024/25	2025/26
<b>Data subjects'...</b>			
<b>Awareness of rights</b>	14%	16%	<b>16%</b>
<b>Awareness of the ICO and confidence in what we do</b>	22%	26%	<b>29%</b>
<b>Data controllers'...</b>			
<b>Awareness of the ICO</b>	59%	63%	<b>62%</b>
<b>Agreement the ICO is clear about what the law requires</b>	72%	74%	<b>77%</b>
<b>Agreement the work of the ICO reduces compliance costs</b>	31%	34%	<b>38%</b>

## Enabling businesses and growth

We have a strong track record of engaging with the organisations that we regulate and seeking to enable their activities within the law.

We proactively monitor the impact that our regulatory activities have on businesses and publish our [Enabling Businesses](#) report. The latest publication shows that the activities in focus have resulted in up to approximately £233 million of economic value for businesses over a five-year period with an average of around £47 million per annum. This captures both cost savings and enhanced revenue from new opportunities.

We continue to engage with government in relation to its growth [Action Plan](#) and are delivering on both the commitments that we have made and contributing to reductions in the administrative costs of regulation. During Q4, we [responded to](#) the government's call for proposals to boost the UK's economy and foster economic growth.

# Update on regulatory impact

We are committed to understanding and explaining the impacts of our regulatory action, with bespoke and proportionate measurement of impacts both before and after interventions. Here we explain our approaches and recent work in this area, with a focus on our priority areas of work.

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## Before intervention

Prior to intervening ('ex-ante'), impact assessments (IAs) are a key way in which regulators balance different obligations and objectives, and ensure that in making a decision to intervene regulatory action is both proportionate to the issue at hand and not unduly burdensome on those that they regulate. Our [Impact Assessment Framework](#) provides stakeholders with a clear picture of how we assess the likely impact of our relevant proposed interventions. Our [impact assessment](#) reports are published on a dedicated webpage. In Q4, we published impact assessments on our [data protection complaints handling approach](#) and our [automated decision making guidance](#).

## After intervention

After intervening ('ex-post') impact refers to the impact of an intervention after it has been implemented and in operation for a period of time. There are a range of different approaches that can be taken to assessing the after intervention impact of an intervention such as monitoring, review and evaluation. Our [Ex-Post Impact Framework](#) outlines the spectrum of approaches we deliver within the ICO to assess our ex-post impact, where relevant. Our highest level of review under the Framework is a 'full-scale review'. Our default position is a presumption of openness and transparency, with an ambition to publish the findings from all of our full-scale ex-post impact work. These publications are available on our [Evaluation and other impact](#) publication webpage. In Q4, we published updated [impact case studies](#).

# Update on our cause and transformation work

To help give clear areas of focus, the ICO has agreed three organisational causes:

## Children's Privacy

In Q4 we concluded our investigations into Reddit and Imgur's use of children's information and age assurance. We fined both platforms for failing to use children's personal information lawfully. [Reddit Inc. were fined £14.47m](#) and [MediaLab AI Inc, owner of Imgur, were fined £247,590](#). We also [published an open letter to social media and video-sharing platforms operating in the UK](#), calling on them to strengthen age assurance measures so young children can't access services that are not designed for them. We wrote directly to 6 platforms to engage with them around their approaches to age assurance.



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## AI and Biometrics

We have begun upstream engagement with foundation model developers, focused on their written responses to our earlier request for information. We are continuing discussions on the remaining concerns and expect to conclude them early in the next financial year. On 31 March 2026 we published guidance for consultation on automated decision making (ADM) following legislative reforms brought by the DUA Act. We will support this consultation by hosting roundtables with the public sector, industry bodies, consumer groups and civil society.



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## Online tracking and AdTech

We are on track to commence automated monitoring across the UK's most visited websites. This will ensure that the improvement delivered across the top 1000 sites is maintained. We have prepared and now published [our advice to government](#) following our review into regulation 6 PECR requirements for online advertising purposes - one of our five initiatives to support the government's ambitions for sustainable economic growth.



## Our transformation programmes

Our purpose as an organisation is to empower people through information. We'll achieve this through our enduring strategic objectives and the way in which we prioritise our work through the lens of our three strategic causes. To help us do this, we've developed five significant work programmes that make up our transformation portfolio.

In support of our **Legislative Change Programme**, the [next phase of the Data \(Use and Access\) Act \(DUAA\) implementation commenced](#) on 5 February 2026, and we published our updated [by design and by default guidance](#). Our [guidance on subject access requests \(SARs\)](#) is ready to use and for law enforcement bodies, [Part 3 codes of conduct](#) has been updated. We also launched a consultation on [updates to our guidance on the Research, Archiving and Statistics \(RAS\) Provisions](#). Details of upcoming consultations and final guidance timescales are set out in [Our plans for new and updated guidance](#).

Our **Customer Experience Programme** launched a free online training and certificate service, Data Protection Essentials, in Q4 with ramp up taking place through 2026/27. This aims to promote economic growth by building confidence among small to medium businesses (SMEs) in using personal information innovatively and compliantly. After extensive consultation, we also launched our [Data Protection framework for handling complaints](#), increased automation and introduced other digital improvements,

to improve the customer experience and increase efficiency.

In February 2026, our **Employee Experience programme** launched recruitment for our new graduate and sandwich placement schemes, which are central to our broader strategic workforce planning and early careers proposition. These initiatives, alongside apprenticeships and other development routes, provide multiple entry points to the organisation, helping to widen access and support internal growth. We also made significant progress on preparing for our head office move to Manchester later this year.

Our **Data, AI and automation programme** continued to expand the ICO Data Academy and developed an 'AI Fundamentals' learning package to support colleagues in building their AI skills. This provides a scalable foundation for ongoing technical learning. And our **Regulatory Transformation programme** successfully launched the full suite of Regulatory Action Framework (RAF) training modules across the organisation during Q4, as well as new tools to help track and manage investigations.

# Update on our performance this quarter

This section of the report includes key performance indicators (KPIs) and statistical data, as well as a supporting update describing our performance and impact work during the quarter. Figures extracted from our systems are based on a data snapshot for consistency, and the following RAG ratings are applied to our measures across this section of the report, unless otherwise stated:

Key to RAG ratings*	(*except for measures targeting less than 1%)
<ul style="list-style-type: none"> <li>● <b>Green</b> = at, or above, target</li> <li>● <b>Amber</b> = within 10% of target</li> <li>● <b>Red</b> = more than 10% away from target</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Green</b> = at, or less than, 1%</li> <li>● <b>Amber</b> = between 1% and 2%</li> <li>● <b>Red</b> = greater than 2%</li> </ul>

## Complaints Q4 2025/26

We receive, assess and respond to complaints from the public about how their personal data is processed by controllers. We also receive service complaints about our handling of this casework.



**124 days**  
 DP case average age  
 at end of quarter  
 Q4 last year: **74 days**



**31,321 cases**  
 DP caseload  
 at end of quarter  
 Q4 last year: **16,454**



**22,680 cases**  
 received  
 Q4 last year: **12,001**

Measure	Last year Q4 24/25	Previous Q3 25/26	Latest Q4 25/26
We will assess and respond to <b>80% of data protection complaints</b> within 90 days	<b>19.5%</b> (Red)	<b>30.6%</b> (Red)	<b>23.2%</b> (Red)
We will assess and respond to <b>90% of data protection complaints</b> within 6 months	<b>97.6%</b> (Green)	<b>52.0%</b> (Red)	<b>67.6%</b> (Red)
<b>Less than 1%</b> of our <b>data protection complaints</b> caseload will be over 12 months old	<b>0.1%</b> (Green)	<b>0.1%</b> (Green)	<b>0.2%</b> (Green)
The Parliamentary and Health Service Ombudsman (PHSO) <b>does not uphold a complaint about us</b> in 100% of cases	<b>100%</b> (Green)	<b>100%</b> (Green)	<b>100%</b> (Green)
We will investigate and respond to <b>90% of service complaints</b> within 30 calendar days. <i>(Combined measure of service complaints across all teams)</i>	<b>85.5%</b> (Amber)	<b>95.1%</b> (Green)	<b>91.2%</b> (Green)

At the end of Q4, the average age of open data protection cases stood at 124 days, continuing the upward trend seen across the year and significantly higher than 74 days at Q4 last year. This reflects the cumulative impact of sustained demand throughout 2025/26 and the growing proportion of older cases remaining in the system.

Total DP caseload reduced to 31,321 cases by the end of the quarter, down from its peak in Q3, though still materially higher than 16,454 cases at Q4 last year. This reduction indicates early progress in stabilising the system; however, the age profile of the remaining caseload means timeliness measures remain under pressure.

Demand during Q4 remained exceptionally high. We received 22,680 DP complaints in the quarter, almost double the volume received in Q4 last year (12,001 cases), and the highest quarterly intake ever recorded. While closure activity has continued at pace, intake levels have continued to outstrip throughput, particularly for newer cases, extending recovery timescales.

Performance against timeliness measures reflects this pressure. 23.2% of DP complaints were assessed and responded to within 90 days, down from 30.6% in Q3, while 67.6% were responded to within six months; an improvement on Q3 but remaining below target. Encouragingly, the proportion of cases over 12 months old remained low at 0.2%, demonstrating continued control over the most aged cases despite wider pressures.

Alongside operational recovery activity, we continue to progress longer-term

transformation. During this quarter, we started to implement changes to the DP complaints process following consultation, supported by technology and process redesign. This programme is intended to improve productivity, reduce avoidable demand, and focus regulatory effort on cases involving the greatest harm, with the benefits expected to provide a more sustainable improvement in performance over 2026/27. We expect to see KPI performance in this area significantly improve in Q1 of 2026/27 as a result.

Elsewhere service complaint handling performance remained strong in Q4 despite wider operational pressures. 91.2% of service complaints were investigated and responded to within 30 calendar days, maintaining a green position and demonstrating consistent performance across teams.

During Q4 we received 18 Parliamentary and Health Service Ombudsman complaints, none of which were upheld by the PHSO during the quarter (100%). Across 2025/26, 47 PHSO complaints were received, none of which were upheld during the year. *NB: due to the nature of reporting timeframes and time needed to consider cases, new case outcomes do not always align directly with the quarter in which the complaint is made. However, we will report any upheld cases, whether new within the quarter or first received in previous quarters, in the quarter where the complaint is upheld. No new or older complaints were upheld during Q4.*

## Enquiries Q4 2025/26

We receive enquiries from the public and from businesses about the processing of personal data, in writing, over the phone and via live chat.



64,729 calls

Q4 last year: **65,050**



14,819 live chats

Q4 last year: **13,730**



2,890 enquiries

Q4 last year: **2,831**

Measure	Last year Q4 24/25	Previous Q3 25/26	Latest Q4 25/26
We will resolve <b>80% of written enquiries</b> within 7 calendar days (combined measure of Public and Business Advice enquiries)	<b>88.1%</b> (Green)	<b>88.0%</b> (Green)	<b>86.3%</b> (Green)
We will resolve <b>99% of written enquiries</b> within 30 calendar days (Combined measure of Public and Business Advice enquiries)	<b>98.9%</b> (Amber)	<b>98.3%</b> (Amber)	<b>97.8%</b> (Amber)
We will answer <b>80% of calls within 60 seconds</b> (Combined public advice and business services calls)	<b>86%</b> (Green)	<b>84%</b> (Green)	<b>85%</b> (Green)
We will answer <b>80% of live chats within 60 seconds</b> (Combined public advice and business services live chats)	<b>92%</b> (Green)	<b>92%</b> (Green)	<b>92%</b> (Green)

Demand across enquiry channels remained high in Q4, with volumes broadly in line with the same period last year. Despite this, performance remained strong and stable across all channels.

We resolved 86.3% of written enquiries within seven calendar days and 97.8% within 30 days, maintaining a green

position on short-term timeliness.

Telephony and live chat performance also remained robust, with 85% of calls and 92% of live chats answered within 60 seconds.

We will continue to focus on productivity and efficiency in enquiries handling to maintain performance as demand remains sustained.

## Assurance Q4 2025/26

We conduct audits of organisations' compliance with data protection legislation, publishing our findings, in the form of executive summaries and outcomes reports, and following-up as needed.



**12 audits**

**Completed in Q4**

Q4 last year: **16**



**240 audit recommendations**

**Made in Q4**

Q4 last year: **230**



**11 audit follow ups**

**Completed in Q4**

Q4 last year: **7**



**100% audit recommendations**

**Completed/in progress**

Q4 last year: **96%**

Measure	Last year Q4 24/25	Previous Q3 25/26	Latest Q4 25/26
<b>90% of our audit recommendations are accepted</b> in full or in part	<b>98%</b> (Green)	<b>98%</b> (Green)	<b>98%</b> (Green)
<b>80%</b> of accepted recommendations, in full or in part, are <b>completed or being actioned</b>	<b>96%</b> (Green)	<b>99%</b> (Green)	<b>100%</b> (Green)

12 audits were completed during the quarter. 240 recommendations were made, 236 of which were accepted or partially accepted with 4 rejected.

During the quarter 11 follow-ups were completed. 359 recommendations had been accepted or partially accepted. 203 were completed and 156 were in progress at the time of the follow-ups.

There were 0 recommendations that had not been started.

7 executive summaries were published in Q4. Our audits and overview reports can be [viewed on our website](#).

Audit activity undertaken in Q4 included audits of Children's Hospitals, Police use of Facial Recognition Technology and providers of Age Assurance solutions.

We completed 85 audit engagements in the course of 2025/26, consisting of 54 audits and 31 follow-up audits. In the course of those audits we made over 1,200 recommendations of which 99% were accepted or partially-accepted by the audited organisations. When we came to undertake follow-up audits we found that 99% of our recommendations had been completed or were being progressed by the audited organisations.

## Personal Data Breach Services Q4 2025/26

We receive notifications of breaches of personal information. By working with organisations to comply with the law and providing appropriate support when breaches occur, we can help to ensure that organisations get it right in future.



**3,725 cases received**

Q4 last year: **3,112**



**38 cases over 12 months old**

Q4 last year: 384

Measures	Last year Q4 24/25	Previous Q3 25/26	Latest Q4 25/26
We will refer or close <b>80% of personal data breach reports</b> within 30 days	<b>75.4%</b> (Amber)	<b>45.9%</b> (Red)	<b>58.8%</b> (Red)
<b>Less than 1% of personal data breach reports</b> will be over 12 months old	<b>25.3%</b> (Red)	<b>1.8%</b> (Amber)	<b>0.6%</b> (Green)

During Q4, intake remained high, reflecting sustained use of the ICO’s regulatory functions across the year. While activity began to stabilise following the large-scale incident reported in Q2, overall workloads remained elevated.

Against this backdrop, we maintained a deliberate focus on progressing and closing our oldest cases. This resulted in a significant reduction of cases over 12 months old, falling from 126 at the end of Q3 to 38 by the end of Q4. This also represents a significant decrease from the year’s high of 745. These cases now account for just 0.6% of the total open caseload, demonstrating steady progress in addressing the most aged cases despite sustained pressure.

This prioritisation had a predictable impact on shorter-term performance measures, as many of the cases closed during the quarter were already over 30 days old. While this reduced the rate at which newer cases could be progressed, it enabled sustained reductions in long-running cases and continued improvements in waiting times for those engaging with the ICO, strengthening the overall position of the caseload.

Across the full year, activity levels illustrate both the scale of demand and the organisation’s response. Receipts increased by 40%, while 3.4% more cases were closed than in 2024/25. This progress has been achieved against a backdrop of increasing volumes,

complexity and public expectation, with the scale and demands of the work continuing to grow.

We will continue to review current workloads and explore further opportunities to support our wider strategy for protecting people's data rights across the UK.

## Freedom of Information Q4 2025/26

We review complaints about the handling of FOI and EIR requests by public bodies, and make statutory decisions. These decisions can be appealed to a Tribunal.



**3,044 cases received**

Q4 last year: **2,073**



**3,505 active cases**

Q4 last year: **1,493**

Measure	Last year Q4 24/25	Previous Q3 25/26	Latest Q4 25/26
We will reach a decision and respond to <b>90% of FOI concerns</b> within six months	<b>93.2%</b> (Green)	<b>79.0%</b> (Red)	<b>81.5%</b> (Amber)
<b>Less than 1% of our FOI caseload</b> will be over 12 months old	<b>0.3%</b> (Green)	<b>0.1%</b> (Green)	<b>0.1%</b> (Green)
<b>66% of FOI tribunal hearings</b> in our favour	<b>80%</b> (Green)	<b>77%</b> (Green)	<b>75%</b> (Green)

As forecasted in previous reports, performance against our ambition of 90% case closure in 6 months fell below target for a second quarter in a row. This will remain so for some time due to the intake and caseload pressures we face. We have maintained productivity in line with recent years, but intake was up 47% year-on-year in Q4 and 40% up year-on-year for the financial year, our highest ever by far, with 2026/27 projecting higher based on the current intake curve.

While the in-year funding boost for the second half of 2025/26 from DSIT meant we were able to bring in some short term staff, due to recruitment and training they only provided a short productivity boost in Q4. Output in Q1 2026/27 will reduce to previous

forecasted levels now this support has ended. It is now taking us more than 9 months to allocate non-priority cases, up from 6 months last quarter. This will continue to rise through 2026/27 and we expect to remain out of target for a prolonged period. We were able to deliver some technical improvements as part of the in-year funding boost, but these will not scale to the extent that they will overtake the intake and caseload pressure we face. We are therefore exploring alternative technological and recovery plan options.

Details of all [our closed case outcomes](#) can be found in our published FOI dataset on the ICO website, as well as all [decision notices](#) and all

[recommendations](#) made in our FOI complaints handling work.

During Q4, 72 First-tier Tribunal cases were closed, of which 54 were successfully defended (75%). (NB: 'Successfully defended' is outcomes other than 'Allowed' and 'Part-Allowed'. Data is reported in-year as a quarterly snapshot). Over the whole year, 239

out of 322 cases were successfully defended, so our outturn performance for 2025/26 stands at 74.2%. (NB: since previously reported in-year figures are snapshots, these do not directly align with our final outturn figure).

## Information Access Q4 2025/26

We are subject to the laws we regulate and respond to requests for information held by the ICO.



**697 cases received**

Q4 last year: **576**



**146 active cases**

Q4 last year: **143**

Measures	Last year Q4 24/25	Previous Q3 25/26	Latest Q4 25/26
We will respond to <b>100% of Information Access Requests</b> within statutory deadlines	<b>98.7%</b> (Amber)	<b>97.8%</b> (Amber)	<b>96.8%</b> (Amber)

The ICO has made a public commitment that we'll respond to 100% of information rights requests within statutory timeframes; as the regulator this is what we aim for when it comes to complying with the statutory duty.

We maintained strong performance in Q4, achieving a compliance rate of 96.8%. During the quarter we received 697 new cases, reflecting the continued upward trend in case numbers we've seen over the course of the year.

The Information Access team is working with colleagues to ensure we are prepared to meet our new complaint handling and reporting obligations under the Data (Use and Access) Act 2025 (DUAA), which will take effect in June 2026.

We are continuing a targeted programme of engagement with business areas with new starters, strengthening their ability to recognise and refer information requests and support us with consultations.

## Corporate Health Q4 2025/26

We are developing additional ‘corporate health’ measures to give additional context to our performance as an organisation and our use of resources.



**4.9% financial  
outturn**

(income 4.9% higher than  
expenditure)



**1,050 full time  
equivalents**

Q4:2024/25: **1,011**

Measure	Last year Q4 24/25	Previous Q3 25/26	Latest Q4 25/26
<b>Financial year-end outturn is within +/-3% of income</b>	<b>1.4%</b> Provisional (Green)	<b>2.8%</b> (Green)	<b>4.9%</b> (Amber)

Our March management accounts show a surplus of £5.5m for 2025/26. Since this predominately reflects a positive over-performance on income, we have therefore applied an ‘Amber’ RAG rating to our outturn (a ‘Red’ rating would be more appropriate in circumstances where expenditure exceeded income beyond our targeted tolerance levels).

Following the agreement of our new Data Protection (DP) fees structure in February 2025, we experienced a full year effect of the new fees in 2025/26. We have also actively managed our Data Protection register along with our registration fee income during the financial year. As a result, we reported a surplus of £2.7m against our budgeted income levels.

We retained £2.6m of extra retainable fine income following successful enforcement and recovery action against [Advanced Software](#) and the

[Capita Group amongst others](#). This is in line with our qualifying expenditure under the [Netting Off Agreement](#). Our overall fine income recovery performance has enabled us to return significant recoveries to the Consolidated Fund.

The surplus against our budgeted income position is after accounting for a significant capital programme in 2025/26, including preparations for our upcoming move to a new head office in Manchester. This had led to the organisation slightly exceeding our Supplementary Estimates capital budget and forecast.

Overall, completing the 2025/26 financial year with a surplus adds value to the Exchequer, and demonstrates our focus on operational performance in delivering the ICO’s regulatory objectives.

## Planning forwards

As regulatory demands grow in 2026/27, we will take on expanded and more explicit regulatory duties under Data (Use and Access) Act 2025); ICO's Board has approved our Medium-term financial plan, setting the financial envelope to continue to deliver our priorities and direction of travel beyond 2026/27.

In line with our strong performance against our income budgets in 2025/26, we have increased our DP fee income and other income budget targets for 2026/27. This will enable us to remain financially sustainable while continuing to operate on a cost-recovery basis and ensuring that our fee income remains aligned with our statutory functions.

Our future financial plan continues our focus on Transformation Programmes, as we look to achieve efficiency gains while our regulatory role continues to evolve. This includes financial provision to complete our move to our new head office in Manchester within 2026/27, as well as funding projects such as the replacement of legacy systems.

In 2026/27, we plan on maintaining momentum on our Workforce Strategy, including work by our People Services directorate to improve workforce analytics to build an organisation fit for the future.

## Buzz Tracking

We track public and business 'buzz' around the ICO. Each week our buzz survey is answered by 2,000 members of the public, and each month we receive responses from a sample of 1,000 business decision-makers.

On average, 17% of the public and 44% of businesses reported hearing about the ICO during Q4. Children's privacy was the primary buzz driver this quarter: announcements around enforcement and investigations (specifically Grok, Imgur and Reddit) and our joint age assurance letter with Ofcom all featured prominently in survey responses.

We now have a full year's worth of buzz tracking data, enabling us to track year-on-year trends and utilise the data in our communications and engagement KPI setting.