

Audit and Risk Committee

Report title: Compliance report

Meeting date: 23 October 2025

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 and service complaint trends. It covers Quarter 1 and Quarter 2 of 2025/26 (1 April 2025 to 30 September 2025).

Fraud

No instances of fraud have been reported in the period.

In August 2025, further engagement took place with DSIT's Central Counter-fraud Expert Services to explore opportunities for knowledge sharing and alignment, particularly around activities for International Fraud Awareness Week 2025.

The Group Manager also undertook engagement with cross-government stakeholders, focusing on approaches to tackling fraud in digital services.

Fieldwork for deep dives into priority areas identified through the updated

fraud risk assessment has been completed, with insights currently being finalised. Work is underway to identify relevant metrics and performance data to assess the effectiveness of existing controls in practice.

Whistleblowing

One anonymous whistleblowing complaint was received during the period: a generic email regarding the culture of the ICO. The claimant advised that they were an ex-employee but declined to provide any further information. The case was closed due to lack of information and evidence.

Insider trading

Insider lists are being maintained. 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 one single Tender Award contract over £50k awarded:

Supplier: Blue Hat Man

Value: £65k

Start Date: 04/08/25 End Date: 23/06/26

Services: A consultant to facilitate the development of a new strategy to replace ICO25

Justification: The consultant was instrumental in developing ICO25 and therefore had the background to take it forward in a new iteration quickly. Given the value is significantly beneath the threshold for the Procurement Act 2023 so poses a very low commercial risk.

Service complaint trends

The first full iteration of the service complaint report for Q1 is provided at Annex 1. The team welcomes feedback from the Committee - particularly any suggestions for additional information for future reports.

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Reviewer: Louise Byers

Sign off: Jen Green

Annexes: Q1 2025-26 Service Complaint Report