

Information Commissioner's Office

Performance and Impact Report

Q1 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 under the DUAA and our obligations with respect to data subjects and controllers, the table below presents a number of enduring performance measures.

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

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.

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.

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 Q1 we published our [draft Consumer internet of things impact assessment](#) for consultation.

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.

Update on our cause and transformation work

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

Children's Privacy

Following our March [children's code strategy progress update](#), we continued to drive improvements to children's privacy settings across a range of SMPs and VSPs featured in our [comparison table](#). We progressed our investigations into how [TikTok, Imgur and Reddit](#) protect the privacy of their child users in the UK, and completed the last of 18 consensual audits into organisations providing Edtech tools. As part of our work to ensure platforms are not unlawfully processing information of under-13s, we developed a framework to risk assess organisations relying on self-declaration only and assessed the use of profiling on two platforms.



AI and Biometrics

During Q1 we published our [AI and Biometrics Strategy](#), and delivered a communications strategy in support of our overall cause. Research on the [public's views and experience of biometric technologies](#) was published in May, and this will be reflected in the policy development work that will be progressed through 2025. We initiated a risk review of a government agency's use of automated decision making, and also undertook the first round of engagement with the recruitment sector on its use of automated decision making.



Online tracking and AdTech

In June [we published draft guidance for consultation](#) on consumer Internet of Things products and services. We also issued letters to 872 of the top 1,000 most-visited websites in the UK asking them to confirm that their cookie banners are compliant; we will complete testing in Q2 to verify that they are securing freely given consent. We also began development of a tool that will enable automation of large-scale monitoring and compliance actions related to online tracking regulations.



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 June, the Data (Use and Access) (DUA) Act gained Royal Assent. External communications products were published on that date bringing together a significant milestone for our **Legislative Change Programme**. Over the next quarter we will undertake further engagement with DSIT (Department for Science, Innovation

and Technology) and Home Office to map out requirements for upcoming Statutory Instruments from DUAA and other legislation. In support of our **Customer Experience Programme**, work began in Q1 to launch a consultation outlining how we plan to change the way data protection cases are triaged and completed.



In June we [announced](#) that we intend to relocate our head office to Manchester in autumn 2026, and our **Employee Experience Programme** is leading this work to ensure that we deliver modern and flexible accommodation with compatible technology for our people.

Our **Data, AI and automation programme** undertook work during the quarter to prepare to launch our new AI Own Use Policy in Q2. Meanwhile our **Regulatory Transformation programme** rolled out the first stage of our new investigations end-to-end process.

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. The following RAG ratings are applied to our performance measures across this section of the report:

Key to RAG ratings*	(*except for measures targeting less than 1%)
Green = at, or above, target Amber = within 10% of target Red = more than 10% away from target	Green = at, or less than, 1% Amber = between 1% and 2% Red = greater than 2%

Complaints Q1 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.



88.51 days

DP case average age
at end of quarter

Q1 last year: **54.55 days**



21,712 cases

DP caseload
at end of quarter

Q1 last year: **10,218**



124 complaints

Across all services
during the quarter

Q1 last year: **96**

Measure	Last year Q1 24/25	Previous Q4 24/25	Latest Q1 25/26
We will assess and respond to 80% of data protection complaints within 90 days	49.9% (Red)	19.5% (Red)	26.6% (Red)
We will assess and respond to 90% of data protection complaints within 6 months	99.2% (Green)	97.6% (Green)	83.9% (Amber)
Less than 1% of our data protection complaints caseload will be over 12 months old	0.2% (Green)	0.1% (Green)	0.1% (Green)
The Parliamentary and Health Service Ombudsman (PHSO) does not uphold a complaint about us in 100% of cases	100% (Green)	100% (Green)	100% (Green)
We will investigate and respond to 90% of service complaints within 30 calendar days. (Combined measure of service complaints across all teams)	88.5% (Amber)	85.5% (Amber)	84.7% (Amber)

New resources were recruited throughout Q1 2025/26, and we welcomed a total of 16 new case officers, with plans to onboard eleven case officers across Q2.

Across Q1 our case closure rates have been up on forecast as our teams work hard to deal with complaints. As our capacity increases we are forecasting that our output will continue to rise.

Our recovery plan forecasted that we would be back within service levels within 18 months but it did not account for the huge surge in cases we have seen since March this year. The average intake per month for the last financial year was 3,500. In Q1 we've seen a significant rise in intake averaging over 5,000 cases per month. Compared with the same period last year, this represents a 50% increase in intake. This rise is unprecedented and we are resetting our recovery plan in light of this, to incorporate improved data forecasting.

In March 2025, we implemented automation of case opening, freeing up case officers to do more valuable work. Later this year, we plan to introduce additional technology tools to reduce

the administrative burden on our case officers and speed up our case handling. We launched a [consultation on draft changes to how we handle data protection complaints](#). These will help case officers improve productivity, increase responsiveness and focus our resources on areas of greatest harm.

For our 90-day Data Protection complaints measure, the numbers were 2,609 in time out of 9,825. Elsewhere, 105 out of 124 service complaints were investigated and responded to within 30 days (84.7%).

During Q1 we received 11 Parliamentary and Health Service Ombudsman complaints, none of which were upheld by the PHSO during the quarter (100%). *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 Q1.*

Enquiries Q1 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.



63,854
calls



14,284
live chats



2,656
enquiries

Q1 last year: **69,059** Q1 last year: **13,880** Q1 last year: **2,579**

Measure	Last year Q1 24/25	Previous Q4 24/25	Latest Q1 25/26
We will resolve 80% of written enquiries within 7 calendar days (combined measure of Public and Business Advice enquiries)	91.9% (Green)	88.1% (Green)	87.8% (Green)
We will resolve 99% of written enquiries within 30 calendar days (Combined measure of Public and Business Advice enquiries)	99.1% (Green)	98.9% (Amber)	98.6% (Amber)
We will answer 80% of calls within 60 seconds (Combined public advice and business services calls)	87% (Green)	86% (Green)	85% (Green)
We will answer 80% of live chats within 60 seconds (Combined public advice and business services live chats)	93% (Green)	92% (Green)	92% (Green)

Performance over the quarter remained steady across our key measures with enquiry volumes remaining at consistent levels and performance near to, or in some areas, exceeding our targets.

We are committed to maintaining this consistency, not just for operational stability, but because it underpins the quality of service we aim to provide. Meeting these measures is a key part of how we ensure that people contacting us receive timely and helpful advice.

We know that behind every enquiry is someone looking for guidance and support and we take that seriously. That's why we monitor our performance closely and work hard to maintain high standards across all channels. The results this quarter show that we're continuing to deliver a reliable service to those businesses and members of the public who reach out to us for advice.

Assurance Q1 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.



13 audits

Completed in Q1

Q1 last year: **9**



327 audit
recommendations

Made in Q1

Q1 last year: **311**



3 audit
follow ups

Completed in Q1

Previous Q4: **3**



100% audit
recommendations

Completed/in progress

Q1 last year: **100%**

Measure	Last year Q1 24/25	Previous Q4 24/25	Latest Q1 25/26
90% of our audit recommendations are accepted in full or in part	100% (Green)	98% (Green)	99% (Green)
80% of accepted recommendations, in full or in part, are completed or being actioned	100% (Green)	96% (Green)	100% (Green)

13 audits were completed during the quarter. 327 recommendations were made, 326 of which were accepted or partially accepted with 1 rejected. During the quarter, 3 follow-ups were completed. 41 recommendations had been accepted or partially accepted. 21 were completed and 20 were in progress at the time of the follow-ups. There were no recommendations that had not been started.

Seven executive summaries were published in Q1 along with overview reports on our work on personal data breach reporting within policing and children's data within the finance sector. Our audits and overview reports can be [viewed on our website](#).

Audit activity undertaken in Q1 included work that contributed to our ongoing projects on Secure Care Homes, EdTech and Personal Data Breach reporting within the policing sector. We also carried out standalone audits of some Local Authorities and NHS Trusts, to assist them in addressing compliance issues.

Investigations Q1 2025/26

We conduct investigations into potential breaches of the legislation we oversee, and have a broad range of regulatory and other enforcement powers.



12 investigations created



55 investigations active

Measure	Last year Q1 24/25	Previous Q4 24/25	Latest Q1 25/26
95% of investigations close within 12 months of starting	90.2% (Amber)	76.5% (Red)	100% (Green)

Since we published our 12-month investigations measure in ICO25, we have shifted the approach to our active caseload in line with our ambition to have fewer, more complex and higher impact cases, and reducing the number of cases that do not fit within ICO25 or our strategic causes. We are therefore retiring this measure from future reports, though during Q1 we closed 10 investigations, all within 12 months of starting (100%).

The introduction of a new prioritisation process in 2024/25 ensures that we are

focusing our regulatory action and resources on the issues that cause the most impact for the public. This is now an electronic process which has improved our internal efficiency.

We issued three Penalty Notices – two under UK GDPR and one PECR, totalling £2,410,000; this included the conclusion of our action involving 23andMe. The PECR penalty was also accompanied by an Enforcement Notice. We also issued two Reprimands under UK GDPR: [Enforcement action | ICO](#)

Personal Data Breach Services Q1 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.



3,264 cases received

Q1 last year: 3,084



572 cases over 12 months old

Q1 last year: 2

Measures	Last year Q1 24/25	Previous Q4 24/25	Latest Q1 25/26
We will refer or close 80% of personal data breach reports within 30 days	84.8% (Green)	75.4% (Amber)	85.2% (Green)
Less than 1% of personal data breach reports will be over 12 months old	0.1% (Green)	25.3% (Red)	31.6% (Red)

Performance on our 12-month measure continued the anticipated decline reported throughout 2024/25, because of the increasing age of our average caseload in this area, with 572 cases over 12 months old at the end of the quarter.

Our recovery arrangements for personal data breach reports are aligned with our transformation plans and additional resource for 5 level D roles and 2.7

level C roles is being recruited. We forecast that performance against this measure will decline until the additional resource is in place, and this will start to positively impact performance in the final quarter of 2025/26.

A recovery plan is being established in Q2 to further forecast performance expectations across the year and explore any additional opportunities for recovery.

Freedom of Information Q1 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.



2,212 cases received

Q1 last year: 1,933



1,979 active cases

Q1 last year: 1,427

Measure	Last year Q1 24/25	Previous Q4 24/25	Latest Q1 25/26
We will reach a decision and respond to 90% of FOI concerns within six months	95.3% (Green)	93.2% (Green)	92.4% (Green)
Less than 1% of our FOI caseload will be over 12 months old	0.1% (Green)	0.3% (Green)	0.2% (Green)
66% of FOI tribunal hearings in our favour	77% (Green)	80% (Green)	68% (Green)

Although we continue to achieve our target of 90% case closure in 6 months, performance will likely begin to dip below that in future updates.

Improvements and semi-automation of some processes in 2024/25 resulted in a further increase to our productivity. However, the combination of significant increases in cases and flat spending review settlement will continue to impact our service in 2025/26 and beyond. The time to allocate a case increased during 2024/25 from 9 weeks at the start of the year to 16 weeks by year-end and will continue to worsen if intake continues at its present rate. We continue to explore automation and new AI opportunities to support performance and offset this impact as much as possible and are also establishing a new FOI Continuous Improvement initiative to ensure we keep finding and implementing changes that strengthen performance. We also continue to make the case for an

increase in funding for the 2026-29 Spending Review.

At the end of Q1 there were 4 outlier cases over 12 months old, one relates to an outstanding Tribunal case where an Information Notice has been appealed and is outside our control. The others are all actively being progressed as quickly as possible.

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 Q1, 73 First-tier Tribunal cases were closed, of which 50 were successfully defended (68.5%). (NB: 'Successfully defended' is outcomes other than 'Allowed' and 'Part-Allowed'. Data is reported in-year as a quarterly snapshot).

Information Access Q1 2025/26

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



632 cases received

Q1 last year: 537



142 active cases

Q1 last year: 148

Measures	Last year Q1 24/25	Previous Q4 24/25	Latest Q1 25/26
We will respond to 100% of Information Access Requests within statutory deadlines	98.4% (Amber)	98.7% (Amber)	97.9% (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.

This ambitious target helped us to continue strong performance across 2024/25 and into Q1, with performance of 97.9%. During the quarter we received 632 new cases; completed

618, and replied late to 13 (NB: completed and late cases do not directly align with new case figures due to the nature of case handling timelines taking place across quarters). We continue to engage with teams across the office to improve processes, transparency and awareness of how we handle information access requests in order to reduce late cases and increase efficiency in our request handling.

Corporate Health Q1 2025/26

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



1.3% financial outturn forecast



1,018 full time equivalents

Q1:2024/25: **1,037**

Measure	Last year Q1 24/25	Previous Q4 24/25	Latest Q1 25/26
Forecast financial year-end outturn is within +/-3% of income	N/A	1.4% (Green)	1.3% (Green)

Our Annual Report for 2024/25 was laid before parliament during Q1, and is now [published on our website](#). Our 2024/25 outturn was a £1.3m surplus (overall 1.4%) against our planned income budget, as summarised in our [March 2025 Management accounts](#). We are speaking to DSIT about how this could be used to support our regulatory activity in 2025/26.

Our June management accounts show a balanced budget position for 2025/26 alongside our latest financial forecast. Our year-end forecast currently predicts a surplus of £1.4m, due to the [enforcement action we took against Advanced Software](#) in late March, for which we now have an agreed payment plan in place. In line with our High Performance strategy, the aim of the ICO is to achieve financial balance each year whilst ensuring funding is targeted towards the highest priorities. The

Finance team are working with the business to understand the mitigations for the net data protection fee income risk reported within the June Management Accounts at between £0.9m to £3.4m. In parallel additional funding opportunities area being identified which will allow clear financial recommendations to be made during Q2 to ensure that we can achieve the objective of financial balance.

Efficiencies

The transformation programmes have set a target to achieve £5m in efficiencies across the next three years from the current financial year investment. In Q1 programmes have been working to establish the levels of efficiencies which can be delivered across each project and programme. This reporting will be established from

Q2 onwards to show both estimated and realised efficiencies.

In Q1 the ICO re-baselined its establishment following the recruitment freeze that was in place during 2024/25. Within the balanced budget set for 2025/26 a decision was made not to replace vacancies like for like, but to prioritise any investment in resources aligned to our Workforce Strategy, and in capacity and capability needed to support our Regulatory Causes and Transformation Programmes.

Work is ongoing in the People directorate to improve our approach to workforce analytics; this work is scheduled for quarters two and three of this financial year and we will include people KPIs in future editions of this report.

Buzz Tracking

We've launched new weekly and monthly surveys to track public and business 'buzz' around the ICO. Each week, 2,000 members of the public are surveyed, and each month, a nationally representative sample of 1,000 businesses is polled.

During Q1 2025/26, 23% of the public and 50% of businesses reported hearing about the ICO. Net sentiment was +8% among the public and +24% among businesses. We'll continue to monitor these metrics over the coming months.