

# ICO25 Performance Scorecard

## Objective one: Safeguard and empower people

Measures	Charter Service Standard Measures	2023/24 Q3	2023/24 Q4	2024/25 Q1	Previous Quarter 2024/25 Q2	Latest Quarter 2024/25 Q3	RAG Status Q3	Q3 Comments
We will assess and respond to 80% of Data Protection complaints within 90 days	Charter Measure	88.2%	64.8%	49.9%	35.9%	12.3%	Red	As previously described, our declining performance is primarily due to high demand for our services running alongside a reduced capacity. We received 10,139 complaints in Q3 which is an increase of 746 (7.9%) compared to the previous year. As outlined in our previous Scorecard, we expect performance against this measure will continue to slide until we are in a position to roll out significant digital and process changes. Plans to transform the way we deal with customer complaints are in train with a staged roll-out planned once we have consulted on them. Work has begun on automating our case creation process and we anticipate delivery in March 2025. We are also in the process of recruiting some case officers on a fixed term basis.
We will assess and respond to 90% of Data Protection complaints within 6 months	Charter Measure	99.7%	99.5%	99.2%	98.7%	98.2%	Green	Performance in Q3 continued to remain above target, though do we anticipate it will slide until the digital and process improvements described above are introduced. Our backlog is building incrementally which is having an impact on this. Since the start of the financial year it has increased on average by 485 cases per month. The average has crept up as the year has gone on as we've been unable to replace leavers.

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Measures	Charter Service Standard Measures	2023/24 Q3	2023/24 Q4	2024/25 Q1	Previous Quarter 2024/25 Q2	Latest Quarter 2024/25 Q3	RAG Status Q3	Q3 Comments
Less than 1% of our Data Protection complaints caseload will be over 12 months old		0.2%	0.1%	0.2%	0.1%	0.1%	Green	We continue to exceed our performance in this area and had 12 cases that were over 12 months old at the end of Q3. Our management team in PADPCS has close oversight of these cases and is working proactively to ensure that our customers are kept up to date.
In 100% of cases, the Parliamentary and Health Service Ombudsman (PHSO) do not uphold a complaint about the ICO		100%	100%	100%	100%	100%	Green	In Q3 we received 4 PHSO complaints, none of which were upheld by the PHSO during the quarter. <i>Due to the nature of reporting timeframes and time needed to consider cases, it should be noted that 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 Q3.</i>
We will investigate and respond to 90% of service complaints within 30 calendar days (Combined measure of service complaints across all teams)	Charter Measure	91.2%	90.9%	88.5%	92.1%	83.2%	Amber	We dealt with 119 service complaints during this quarter, with 20 taking longer than 30 days (83.19%). The slight increase in numbers compared to Q2 and complexity around some of these complaints meant that our performance dipped slightly this quarter.

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Measures	Charter Service Standard Measures	2023/24 Q3	2023/24 Q4	2024/25 Q1	Previous Quarter 2024/25 Q2	Latest Quarter 2024/25 Q3	RAG Status Q3	Q3 Comments
95% of investigations close within 12 months of starting		97.6%	97.6%	90.2%	95.7%	90.0%	Amber	The case progression against this ICO25 indicator has remained stable this quarter. Nine cases were closed across the Directorate, with one case not achieving target; this was a criminal investigation, which commenced in March 2023 and had a 'no further action' decision in October 2024. The active caseload (71) has decreased significantly since the comparable quarter last year (152), when we took steps to reduce the number of cases that did not fit within ICO25 or our strategic causes, and were therefore not in line with our ambition to have fewer, more complex and higher impact cases.
We will respond to 100% of Information Access Requests within statutory deadlines	Charter Measure	97.3%	98.4%	98.4%	97.6%	99.0%	Amber	The ICO has set an ambitious target of 100% against this measure, and we have continued to maintain a high level of performance in Q3, where we recorded our highest compliance rate in several years at 99%. Nonetheless, we continue to engage with teams across the office to improve processes and promote awareness and understanding of how we handle information access requests in order to reduce late cases and increase efficiency in our request handling.

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## Objective two: Empower responsible innovation and sustainable economic growth

Measures	Charter Service Standard Measures	2023/24 Q3	2023/24 Q4	2024/25 Q1	Previous Quarter 2024/25 Q2	Latest Quarter 2024/25 Q3	RAG Status Q3	Q3 Comments
We will resolve 80% of written enquiries within 7 calendar days ( <i>Combined measure of Public and Business Advice enquiries</i> )	Charter Measure	88.2%	92.0%	91.9%	91.5%	61.7%	Red	In Q3 we undertook a pilot in our Business Services department to allow us to help more organisations with their information rights queries and ensure that those who are eligible pay their Data Protection (DP) fees. Colleagues from our Business Advice Service stepped in to support this pilot, although this did build up a backlog of enquiries in this area during the channel shift. The pilot has now finished, and we are making good progress to get back on track. We expect to return to agreed service levels during Q4.
We will resolve 99% of written enquiries within 30 calendar days ( <i>Combined measure of Public and Business Advice enquiries</i> )	Charter Measure	98.6%	99.3%	99.1%	99.2%	81.3%	Red	As outlined above, we built up a backlog of enquiries in business services during the channel shift pilot. The pilot has now finished, and we are making good progress to return to agreed service levels during Q4.
We will answer 80% of calls within 60 seconds ( <i>Combined public advice and business services calls</i> )	Charter Measure	88%	86%	87%	87%	85%	Green	Overall during Q3, 62,214 calls were answered within 60 seconds out of 73,276 calls answered (85%), representing relatively stable performance in support of a slightly increased volume to those received and answered in Q2.

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Measures	Charter Service Standard Measures	2023/24 Q3	2023/24 Q4	2024/25 Q1	Previous Quarter 2024/25 Q2	Latest Quarter 2024/25 Q3	RAG Status Q3	Q3 Comments
We will answer 80% of live chats within 60 seconds <i>(Combined public advice and business services live chats)</i>	Charter Measure	90%	92%	93%	92%	79%	Amber	During Q3, a combined total (across business services and public advice) of 14,756 chats were answered within 60 seconds out of 18,749 chats answered in the quarter (79%). Whilst overall timeliness decreased between quarters, there was a 30% increase in the volume of answered chats.
We will refer or close 80% of personal data breach reports within 30 days	Charter Measure	69.0%	63.5%	84.8%	87.0%	88.9%	Green	As previously outlined, although performance remains above target, our overall number of active cases and average age of cases continues to increase, meaning that closing older cases has an adverse impact on our newer cases and performance against this measure. We are considering changes we can make to close cases more efficiently, however we project that performance will decrease against this measure later in 2024/25 in order to positively impact and reduce our active caseload.
Less than 1% personal data breach reports will be over 12 months old		0.1%	0.0%	0.1%	3.4%	14.0%	Red	We outlined in earlier scorecards that the increasing age of our average caseload would adversely impact performance against this measure. Performance moved to red during Q2 and worsened in Q3. The number of PDB reports over 12 months old at the end of the quarter was 279, up from 66 at the end of Q2. We are currently considering improvements as part of our new operating model, which we anticipate will improve performance in 2025/26, though forecast a continued decrease in performance until these changes are embedded.

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90% of our audit recommendations are accepted in full or in part		100%	99%	100%	99%	99%	Green	13 audits were completed in Q3. 317 recommendations were made, 314 of which were accepted or partially accepted with 3 rejected.
80% of accepted recommendations, in full or in part, are completed or being actioned		94%	95%	100%	95%	98%	Green	11 follow-ups were completed in Q3. 344 recommendations had been accepted or partially accepted. 212 were completed and 124 were in progress at the time of the follow-ups. There were 8 recommendations that had not been started.
We will respond to 100% of prior consultation submissions within statutory timeframes	Charter Measure	100%	N/A (None received)	N/A (None received)	N/A (See commentary)	N/A (See commentary)	Not Applicable	1 submission was received during Q3 and dealt with within timeframes, however this was withdrawn at the end of the process by the controller. There were therefore no applicable submissions in line with the measure this quarter.

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## Objective three: Promote openness and transparency

Measures	Charter Service Standard Measures	2023/24 Q3	2023/24 Q4	2024/25 Q1	Previous Quarter 2024/25 Q2	Latest Quarter 2024/25 Q3	RAG Status Q3	Q3 Comments
We will reach a decision and respond to 90% of Freedom of Information concerns within 6 months	Charter Measure	97.4%	95.3%	95.3%	95.9%	94.6%	Green	We continue to achieve our more ambitious target of 90% (we originally committed to 80% against this measure in ICO25). Our resource challenges remain and, as forecasted, this will start to impact through the second half of this year, with a small dip in Q3 performance already seen. This is expected to impact further in Q4, however strong performance early in the year will mean overall performance will remain 'green' for 2024/25.
Less than 1% of our Freedom of Information caseload will be over 12 months old		2.8%	0.1%	0.1%	0.2%	0.3%	Green	There are now four outlier cases over 12 months old. Three are due to information notices appealed and we await judgements from the tribunals before we can proceed further with our investigation. We expect to resolve the other outlier case, which was over a year old once transferred to FOI, early in Q4.
66% of Freedom of Information tribunal hearings in our favour		76%	57%	77%	81%	69%	Green	Data is reported in-year as a quarterly snapshot; during Q2, 62 First-tier Tribunal (FTT) cases were closed, of which 43 were successfully defended (69%). (NB: 'Successfully defended' is outcomes other than 'Allowed' and 'Part-Allowed').
We will publish 100% of our FOI case outcomes		100%	100%	100%	100%	100%	Green	Details of all our closed case outcomes can be found in our published FOI dataset on the ICO website under 'About the ICO' - 'Our information' - 'Complaints and concerns datasets'. All decision notices are also published on the ICO website under 'Action we've taken' - 'Decision notices'.

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We will publish all recommendations made in our FOI complaints handling work		100%	100%	100%	100%	100%	Green	All recommendations are published on the ICO website under 'Action we've taken' - 'FOI Regulatory Action'.
We will publish all recommendations made in our audit work		100%	100%	100%	100%	100%	Green	8 executive summary reports were published in Q3 along with an overview report on our work on the use of AI in the Recruitment sector. <i>NB: This measure reports the number of executive summaries published against the total number due for publication whilst we develop an approach where we will publish a digest of the recommendations that have been made. There may be occasion where we do not publish an executive summary, for instance where regulatory action is being considered or confidentiality concerns have been raised. These are exceptions and will be noted in commentary.</i>

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## Objective four: Continuously develop the ICO's culture, capacity and capability

Research underpinning the five 'shifts of approach' which support this objective are reported annually alongside our 'outcome' and 'sentiment' measures. Our baseline data for these measures was presented as part of our 2023/24 year-end (Q4) scorecard, published in May 2024 and will next be included in our 2024/25 year-end (Q4) scorecard.

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