

# Performance and Impact Report

Q2 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.

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

# 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 Q2, we published draft impact assessments related to [Distributed Ledger Technologies](#) and our [Data protection complaint handling approach](#) both 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. In Q2, we published our [FOI Upstream Evaluation](#) and our [2024/25 Enabling Businesses in the UK economy](#) report.

# Update on our cause and transformation work

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

## Children's Privacy

During Q2 we worked with Ofcom to develop a joint statement on age assurance for publication in January 2026. A decision has been taken to open a programme of work to drive improvements on Social Media Platforms (SMPs)/ Video Sharing Platforms (VSPs) who currently only use self-declaration as a way of identifying under-13s. We also undertook further analysis of data protection legislation and associated guidance to create an analytical framework for the investigation into how TikTok processes the personal information of 13 - 17 year olds in the UK in their recommender systems.



---

## AI and Biometrics

In August the [final audit report](#) was agreed with South Wales and Gwent Police on their use of facial recognition technologies (FRT). We gained assurance that their processes for live and retrospective FRT enabled them to identify risks around lawfulness, fairness and accountability. We also analysed responses from 11 key Foundation Models (FM) developers and conducted a landscape review to inform our supervision strategy. This will ensure FM developers and deployers review data protection processes and implement appropriate safeguards to mitigate harms to individuals.



---

## Online tracking and AdTech

In September we published the [exit report](#) following Meta's Regulatory Sandbox plan; helping to provide regulatory certainty to Meta as it researches a system that it intends will ensure user privacy and enable effective online advertising measurement. During the quarter we also published the DUA updates to the Storage and Access Technologies guidance for consultation. The call for views on our approach to regulating online advertising has now closed and responses are being analysed.



## 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**, during Q2 we worked with DSIT and the Home Office to plan the timetable and further engagement for upcoming Statutory Instruments from DUAA, resulting in the [commencement SI being laid and coming into force on 20 August](#). During Q2 we published a [range of consultations](#) on ICO guidance, to provide certainty for organisations on how they can make use of the new provisions in the law, including [draft](#)

[recognised legitimate interest guidance](#), [storage and access technologies](#) and [draft complaints guidance for organisations](#). Work also included governance transition activities focused on the legal transfer schemes, as well as preparing for the new Board, including drafting new Terms of Reference. And, in August, our **Customer Experience Programme** [launched a consultation](#) on draft changes to how we handle data protection complaints.



Our **Employee Experience Programme** commenced consultation on our intention to [relocate our head office to Manchester in autumn 2026](#), and organisation engagement has taken place around the design plans throughout the quarter. Our **Data, AI and automation programme** successfully launched our new AI Own Use Policy in Q2, which

promotes and supports our responsible adoption and use of AI. And our **Regulatory Transformation programme** launched 'Introduction to the Regulatory Action Framework (RAF)' learning materials to senior leaders, introducing our new principle-based framework for making better regulatory interventions.



# 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:

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

## Complaints Q2 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.



106.87 days

DP case average age  
at end of quarter

Q2 last year: **62.46 days**



30,692 cases

DP caseload  
at end of quarter

Q2 last year: **11,647**



18,522 cases  
received

Q2 last year: **10,549**

Measure	Last year Q2 24/25	Previous Q1 25/26	Latest Q2 25/26
We will assess and respond to <b>80% of data protection complaints</b> within 90 days	<b>35.9%</b> (Red)	<b>26.6%</b> (Red)	<b>38.3%</b> (Red)
We will assess and respond to <b>90% of data protection complaints</b> within 6 months	<b>98.7%</b> (Green)	<b>83.9%</b> (Amber)	<b>79.4%</b> (Red)
<b>Less than 1% of our 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>92.1%</b> (Green)	<b>84.7%</b> (Amber)	<b>83.8%</b> (Amber)

We have delivered an improvement this quarter in our 90 day complaints measure, up 11.7 percentage points on last quarter, although we also saw more cases in our backlog that were over six months old. Case closure rates in Q2 grew 3.5% vs Q1, topping 10,000 for the first time. This reflects increased staffing as the 16 additional case officers hired in Q1 become productive. During Q2, we also added a further 11 case officers and will bring in further temporary staff in Q3.

However, demand continues to rise. The ICO received 18,522 data protection complaints in Q2, up from 15,319 in the previous quarter and 76% higher than the same period last year.

To tackle this, we are continuing to invest in transforming our processes and use of technology. In August, we launched a [consultation on draft changes to our data protection](#)

[complaints process](#). This initiative, along with technology tools, aims to boost productivity, enhance responsiveness, and focus resources on areas of greatest harm.

Elsewhere, 93 out of 111 service complaints (across all teams) were investigated and responded to within 30 days (83.8%). During Q2 we received five 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 Q2.*



## Enquiries Q2 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.



77,346 calls

Q2 last year: **70,908**



15,875 live chats

Q2 last year: **14,395**



2,997 enquiries

Q2 last year: **2,439**

Measure	Last year Q2 24/25	Previous Q1 25/26	Latest Q2 25/26
We will resolve <b>80% of written enquiries</b> within 7 calendar days (combined measure of Public and Business Advice enquiries)	<b>91.5%</b> (Green)	<b>87.8%</b> (Green)	<b>87.5%</b> (Green)
We will resolve <b>99% of written enquiries</b> within 30 calendar days (Combined measure of Public and Business Advice enquiries)	<b>99.2%</b> (Green)	<b>98.6%</b> (Amber)	<b>98.5%</b> (Amber)
We will answer <b>80% of calls within 60 seconds</b> (Combined public advice and business services calls)	<b>87%</b> (Green)	<b>85%</b> (Green)	<b>82%</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>91%</b> (Green)

We have seen year on year increases in enquiries from organisations and members of the public across all channels. Despite this increased demand, we have hit or beaten all our key measures in this area. We will continue to focus on increased productivity and efficiency in enquiries handling to seek to maintain this performance.

# Assurance Q2 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.



16 audits

Completed in Q2  
Q2 last year: 12



337 audit  
recommendations

Made in Q2  
Q2 last year: 323



7 audit  
follow ups

Completed in Q2  
Q2 last year: 6



99% audit  
recommendations

Completed/in progress  
Q2 last year: 95%

Measure	Last year Q2 24/25	Previous Q1 25/26	Latest Q2 25/26
90% of our audit recommendations are accepted in full or in part	99% (Green)	99% (Green)	99% (Green)
80% of accepted recommendations, in full or in part, are completed or being actioned	95% (Green)	100% (Green)	99% (Green)

16 audits were completed during the quarter. 337 recommendations were made, 333 of which were accepted or partially accepted with 4 rejected.

During the quarter, 7 follow-ups were completed. 155 recommendations had been accepted or partially accepted. 89 were completed and 65 were in progress at the time of the follow-ups.

There was 1 recommendation that had not been started.

4 executive summaries were published in Q2. Our audits and overview reports can be [viewed on our website](#).

Audit activity undertaken in Q2 included audits of EdTech providers, and the first of a planned series of police use of Facial Recognition Technology.

# Personal Data Breach Services Q2 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.



6,649 cases received

Q2 last year: 3,030



745 cases over 12 months old

Q2 last year: 67

Measures	Last year Q2 24/25	Previous Q1 25/26	Latest Q2 25/26
We will refer or close <b>80% of personal data breach reports</b> within 30 days	<b>87.0%</b> (Green)	<b>85.2%</b> (Green)	<b>85.5%</b> (Green)
<b>Less than 1% of personal data breach reports</b> will be over 12 months old	<b>3.4%</b> (Red)	<b>31.6%</b> (Red)	<b>11.2%</b> (Red)

Q2 saw the receipt of 6,649 breach reports. Around 2,800 of these related to a single incident, with each affected organisation submitting their own report. A further, unrelated incident, leading to over 276 separate breach reports, also occurred in Q2.

Performance against the 12-month measure appears improved. However, the number of cases over 12 months old has increased from 572 at the end of Q1, to 745 at the end of Q2. As the caseload increased so rapidly during Q2, the cases over 12 months old now

account for a smaller percentage of the whole.

We have appointed eight new staff, and they will join us during Q3. Once these new staff have received sufficient training to start dealing with cases, we expect performance against the 30-day measure to worsen initially, as we'll be able to close older cases. However, the 12-month measure should improve. We have drafted a recovery plan that considers options other than staffing increases, including reviewing processes and improving technology.

## Freedom of Information Q2 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.



2,692 cases  
received

Q2 last year: **1,932**



2,651 active  
cases

Q2 last year: **1,344**

Measure	Last year Q2 24/25	Previous Q1 25/26	Latest Q2 25/26
We will reach a decision and respond to <b>90% of FOI concerns</b> within six months	<b>95.9%</b> (Green)	<b>92.4%</b> (Green)	<b>86.9%</b> (Amber)
<b>Less than 1% of our FOI caseload</b> will be over 12 months old	<b>0.2%</b> (Green)	<b>0.2%</b> (Green)	<b>0.1%</b> (Green)
<b>66% of FOI tribunal hearings</b> in our favour	<b>81%</b> (Green)	<b>68%</b> (Green)	<b>81%</b> (Green)

As forecasted in our Q1 report, performance against our ambition of 90% case closure in 6 months fell below target this quarter. We have maintained productivity in line with resources available but our performance has deteriorated more rapidly than expected due to a significant increase in new cases, which are now 25% higher year-on-year for the first six months of 2025/26.

We have received a short term funding boost to the end of the financial year from DSIT, which we are using to bring in some short term staff, as well as to explore technological opportunities that could underpin more transformational change. However, even our optimistic projections regarding the impact of the

latter are that they will only help us absorb, at most, half of the intake rises we have seen so far this year.

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 Q2, 77 First-tier Tribunal cases were closed, of which 62 were successfully defended (80.5%). (NB: 'Successfully defended' is outcomes other than 'Allowed' and 'Part-Allowed'. Data is reported in-year as a quarterly snapshot).

# Information Access Q2 2025/26

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



733 cases received

Q2 last year: 611



166 active cases

Q2 last year: 149

Measures	Last year Q2 24/25	Previous Q1 25/26	Latest Q1 25/26
We will respond to <b>100% of Information Access Requests</b> within statutory deadlines	<b>97.6%</b> (Amber)	<b>97.9%</b> (Amber)	<b>97.0%</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.

This ambitious target helped us to continue strong performance in Q2, with performance of 97%. During the quarter we received 733 new cases, a 20% rise when compared to 611 in the same period in 2024/25.

The Information Access team continue to work closely with communications colleagues to increase proactive disclosures on key activities to promote transparency and reduce the need for people to make requests to the ICO under the Freedom of Information Act.

There is also a programme of future engagement with colleagues who work on AI-related projects, with the aim of ensuring that both areas can mutually support each other when consulting about AI-related information requests.

## Corporate Health Q2 2025/26

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



0% financial  
outturn forecast



1,030 full time  
equivalents

Q2:2024/25: **1,015**

Measure	Last year Q2 24/25	Previous Q1 25/26	Latest Q2 25/26
Forecast <b>financial year-end outturn is within +/-3%</b> of income	N/A	<b>1.3%</b> (Green)	<b>0%</b> (Green)

Our September management accounts show a balanced budget position for 2025/26. Our year-end forecast also shows a balanced breakeven position.

We secured significant fine recoveries on behalf of the Consolidated Fund through enforcement action against [Advanced Software](#) and the [Capita Group](#). We also secured our ability to partially retain recoveries to cover our qualifying expenditure under the [Netting Off Agreement](#).

We have actively managed, and continue to do so, our Data Protection register and our registration fee income. We are currently reporting no risk of not achieving our budgeted level of income.

We have committed the lease on our new Manchester head office and begun to design and plan in detail the fit out and other preparations for occupancy next year. Our forecasts include best estimates of the related costs this year as these will inevitably straddle the upcoming financial year end if we are to

be ready for the opening in autumn of 2026.

### Planning forwards

Based on our Q2 financial position we have updated our Medium-term Financial Plan. The Plan is informing parameters for setting a new budget before the start of the next financial year; and the financial priorities and direction of travel beyond 2026/27, aligned to our Workforce Strategy and growing the capacity and capability needed to support our Regulatory Causes and Transformation Programmes.

The Transformation Programmes continue to work towards specifying our investments and the levels of benefits and efficiencies that individual projects that can deliver to support achievement against our Medium-term financial plan.

Reporting against benefits and efficiencies will commence from Q3.

As reported at Q1, work continues in the People directorate to improve our

approach to workforce analytics; work took place across Q2 and will continue across Q3 of this financial year and we will include additional people KPIs in future editions of this report.

## **Buzz Tracking**

We continue to 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 nationally representative sample of 1,000 businesses.

17% of the public and 49% of businesses reported hearing about the ICO during Q2. Notably, the proportion of businesses that have heard about our AI and Biometrics work has almost doubled since April – correlating with our AI and Biometrics strategy launch during Q2.