

11 November 2025

IC-444211-G8J4

Request

You asked us:

"Please provide information held by the ICO for the years 2014–2024 concerning:

- 1. The number of data protection complaints or investigations involving age verification or identity verification providers.*
- 2. Any enforcement actions or reprimands issued to organisations in connection with the processing of personal data for age or ID verification purposes.*
- 3. The number of reported data breaches relating to biometric or document-based verification systems.*

Please provide all available data in spreadsheet or report format."

We received your request on 4 November 2025.

We have handled your request under the Freedom of Information Act 2000 (the FOIA).

Our response

It is not possible to confirm the extent to which we hold information falling within the scope of your request. This is because conducting the relevant searches for questions 1 and 3 would breach the cost limit envisaged by section 12 of the FOIA.

Section 12(2) of the FOIA states that a public authority is not obliged to confirm or deny if requested information is held if the estimated cost of establishing this would exceed the appropriate cost limit.

I have provided some more detail about why this is the case in this instance below, along with some advice about how a refined request, with a narrower scope, may elicit information which is of interest to you.

Section 12 of the FOIA

Section 12 makes clear that a public authority is not obliged to comply with a FOI request if the authority estimates that the cost of complying with the request would exceed the 'appropriate limit'. The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 stipulates that the 'appropriate limit' for the ICO is £450. We have determined that £450 would equate to 18 hours work.

Under data protection legislation, individuals have the right to lodge a complaint with the ICO as the relevant supervisory authority in the UK. The details of these complaints, along with the details of thousands of other enquiries and concerns regarding the other laws we oversee, are processed within our casework management system.

An electronic record is created for every case, every complainant and every 'complained about' organisation. This is because part of our role is to improve the information rights practices of organisations by gathering and dealing with concerns raised by members of the public.

We do not record complaints or data breaches in the granularity that you have requested. We cannot filter cases in a way that would identify all those which relate to age or ID verification services, as this is not something we generally need for our business purposes. We are also unable to run a keyword search for phrases such as 'ID verification' or 'age verification'.

As such, to establish the information that we hold, and which falls within the scope of request would require a manual search of the correspondence on thousands of cases.

We handle around 40,000 data protection complaints and 12,000 data breach reports a year. Searching through all cases which may hold information in scope

would take far more than the 18 hours which would accrue a charge of £450 or less, triggering the provisions of section 12 of the FOIA.

Advice and assistance

You could consider narrowing the scope of your request to bring it under the cost limit. For example, data protection complaints submitted about specific identity verification providers. You would need to provide us with the names of these providers for us to conduct these searches. Alternatively, you could exclude complaint casework and identify a specific team or area of our work as regulator, and a shorter timeframe.

Please note, a refined request may still exceed the appropriate limit at section 12, depending on the search parameters, and that other FOIA exemptions may apply to the information within scope.

We publish details of data protection complaints and data breach reports that we have received on our website here:

[Data protection complaints - data sets | ICO](#)
[Personal data breach cases - data sets | ICO](#)

We advise that you review the information included within these datasets as this will give insight into the categories that we use to record complaints and personal data breaches that we receive. This may help to refine your request.

In relation to question 2, we publish details of enforcement action that we have taken on our website here: [Enforcement action | ICO](#). You can use the 'keyword' filter to search for cases that you are interested in. The information published on our website only goes as far back as 2022, please review the National Archives for older versions of the ICO website: [Archive Timeline - UK Government Web Archive](#).

We have recently provided a response to a FOI request about age verification providers and the Online Safety Act 2023, you may find this useful, I have linked our response here: [IC-427392-L7F0 | ICO](#).

This concludes our response to your request.

Next steps

You can ask us to review our response. Please let us know in writing if you want us to carry out a review. Please do so within 40 working days.

You can read a copy of our full [review procedure](#) on our website.

If we perform a review but you are still dissatisfied, you can complain to the ICO as regulator of the FOIA. This complaint will be handled just like a complaint made to the ICO about any other public authority.

You can [raise a complaint](#) through our website.

Your information

Our [privacy notice](#) explains what we do with the personal data you provide to us, and sets out [your rights](#). Our [Retention and Disposal Policy](#) details how long we keep information.

Yours sincerely,



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