

Reference: 02220120

Information Requests
information.requests@ofcom.org.uk

30 July 2026

Freedom of Information request: Right to know request

Thank you for your request for information about fines collected from outside the United Kingdom.

We received this request on 2 July 2026 and we have considered your request under the Freedom of Information Act 2000 ("the FOI Act").

Your request

This request concerns Ofcom's decision-making, governance, financial planning, legal advice and expenditure relating to the investigation, enforcement and proposed imposition of financial penalties against entities where there has been discussion or consideration that enforcement or recovery of those penalties may be difficult or impossible in practice, including but not limited to organisations established or operating outside the United Kingdom.

For the avoidance of doubt, this request includes (where applicable) enforcement action under the Online Safety Act 2023.

Please provide the following information.

1. Financial Planning

Please disclose all documents concerning the anticipated financial implications of pursuing these enforcement actions, including but not limited to:

- Business cases.*
- Cost-benefit analyses.*
- Financial modelling.*
- Treasury submissions.*
- Budget forecasts.*
- Internal funding approvals.*
- Resource allocation documents.*
- Project plans.*
- Cost assumptions.*
- Risk-adjusted financial assessments.*
- Forecasts of anticipated legal costs.*
- Forecasts of anticipated investigation costs.*
- Forecasts of anticipated enforcement costs.*
- Forecasts of anticipated recovery costs.*
- Forecasts of anticipated litigation costs.*
- Forecasts of anticipated appeal costs.*
- Forecasts of anticipated external counsel costs.*

- *Forecasts of anticipated expert witness costs.*
- *Forecasts of staff time and staffing costs.*
- *Forecasts of opportunity costs arising from diversion of regulatory resources.*

2. Actual Costs

Please provide records showing the actual expenditure incurred to date, broken down where reasonably practicable into categories including:

- *Internal staff costs.*
- *External legal advice.*
- *Barristers' fees.*
- *Solicitors' fees.*
- *Expert advice.*
- *Consultants.*
- *Investigation costs.*
- *Digital forensic work.*
- *Enforcement costs.*
- *Litigation costs.*
- *Travel.*
- *Administrative costs.*
- *Communications and media costs.*
- *Any other material expenditure.*

Where exact figures are not available, please provide the closest available estimates or recorded management information.

3. Legal Advice

Please provide:

- *The dates on which external legal advice was commissioned.*
- *The identity of each law firm, chambers or external legal adviser instructed.*
- *The value of each engagement.*
- *The procurement route used.*
- *The total amount paid to each adviser.*
- *The scope of each instruction.*
- *Any legal opinions or advice capable of disclosure under the Act.*
- *Any summaries of privileged advice prepared for governance or decision-making purposes.*
- *Any assessments concerning:*
 - *enforceability of financial penalties;*
 - *jurisdictional issues;*
 - *recognition or enforcement overseas;*
 - *prospects of recovery;*
 - *practical barriers to enforcement;*
 - *reputational risk;*
 - *litigation risk.*

Where legal professional privilege is relied upon, please identify each document withheld, the date, author, recipient, subject matter and exemption relied upon.

4. Governance

Please provide:

- Board papers.
- Executive Committee papers.
- Steering group papers.
- Programme Board papers.
- Decision logs.
- Governance papers.
- Approval papers.
- Escalation papers.
- Briefing papers.
- Ministerial submissions.
- Internal recommendations.
- Risk registers.
- Programme dashboards.
- Exception reports.

5. Meetings

Please provide:

- Agendas.
- Minutes.
- Notes.
- Attendance records.
- Presentations.
- Decision records.
- Action logs.
- Follow-up papers.

This includes meetings involving:

- the Ofcom Board;
- Executive Committee;
- Directors;
- Legal Directorate;
- Online Safety Group;
- Enforcement teams;
- Finance teams;
- Audit or Risk Committees;
- external legal advisers;
- Government departments.

6. Internal Communications

Please provide copies of internal communications discussing:

- whether financial penalties were realistically recoverable;
- whether enforcement would primarily have symbolic or deterrent value;
- expected public messaging;
- reputational considerations;
- anticipated criticism;
- media handling;
- proportionality of enforcement;
- value for money;

- taxpayer impact;
- likelihood of successful recovery.

This includes emails, Microsoft Teams messages, Slack messages, Signal messages where held, briefing notes and memoranda.

7. Risk Management

Please disclose all documents assessing:

- financial risk;
- legal risk;
- operational risk;
- reputational risk;
- judicial review risk;
- appeal risk;
- international enforcement risk;
- risks of non-payment;
- risks associated with overseas entities.

8. Performance Measures

Please provide documents recording:

- success criteria;
- key performance indicators;
- objectives;
- measures of regulatory effectiveness;
- anticipated deterrent effect;
- evaluation methodology;
- post-action reviews.

9. Value for Money

Please provide any documents assessing:

- whether anticipated expenditure was proportionate;
- expected return on investment;
- expected deterrent benefit;
- alternative regulatory options considered;
- reasons for rejecting alternatives;
- compliance with Managing Public Money principles;
- any internal value-for-money assessments.

10. Correspondence with Government

Please provide correspondence between Ofcom and:

- the Department for Science, Innovation and Technology;
- HM Treasury;
- the Cabinet Office;
- the Attorney General's Office;
- any other Government department,

which discusses:

- funding;

- costs;
- enforceability;
- legal risks;
- public expenditure;
- strategic objectives;
- financial implications.

11. Procurement

Please provide:

- procurement documents;
 - tender documents;
 - contracts;
 - framework call-offs;
 - purchase orders;
 - invoices;
 - payment records,
- relating to external legal or advisory services connected with these enforcement actions.*

12. Audit

Please provide:

- internal audit reports;
- external audit reports;
- assurance reviews;
- Gateway Reviews;
- Internal Audit findings;
- National Audit Office correspondence (if held);
- recommendations relating to financial management or governance.

13. Time Period

Unless otherwise stated, this request covers information created from 1 January 2023 to the date this request is processed.

Our response

In response to the information requested, we consider that this is exempt under section 12 of the FOI Act. Section 12 of the FOI Act provides that a public authority is not obliged to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the “appropriate limit”. The appropriate limit is set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004, and is, for Ofcom, £450, which is equivalent to 18-hours. That sum is intended to cover the estimated costs involved in determining whether Ofcom holds the information requested, identifying, locating, retrieving and extracting the information from any document containing it. The Regulations provide that costs are to be estimated at a rate of £25 per person per hour.

In order to satisfy your request and provide the required information, we would need to collate information from a number of departments and teams across Ofcom. The breadth of the information requested is very broad and covers both current and past information, encapsulating the need to consider meetings and documents over a three-year period that may mention the

investigation, enforcement and proposed imposition of financial penalties, regardless of their intended topic. Each involved team member would then need to extract the relevant information, and we would consider whether any exemptions to disclosure apply. This would take us beyond the 18-hour limit of complying with a request.

You may wish to consider submitting a narrower, more focused request, for example, a specific area of Ofcom's investigations or enforcement actions, a narrower field of departments or teams, and a much smaller timeframe. We would then consider this under the FOI Act. However, should you decide to make a further request for information, please note that the aforementioned appropriate limit and/or other exemptions may apply.

Additionally, the following previous Freedom of Information responses may be of interest to you:

[Enforcement of Age Assurance duties for online pornography providers.](#)

[Costs accrued penalties & comms - 4Chan & Kiwi Farms](#)

[Enforcement of the Online Safety Act](#)

Yours sincerely,

Information Requests

Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team (information.requests@ofcom.org.uk) to request an internal review.

Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office.](#)