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Director: Lisa Osofsky

Dame Meg Hillier MP
Chair of the Public Accounts Committee
House of Commons,
London,
SW1A 0AA

Our Ref:

Date: 23 March 2022

Dear Dame Meg,

I am writing in response to recommendation 4c of the Public Accounts Committee (PAC)'s report on excess votes relating to the Serious Fraud Office's (SFO) accounts in 2020/21 [HC1099], which was published on 22nd February 2022.

This recommendation requires the SFO to write to the PAC setting out the findings from our internal review of control failures and the steps that we took immediately to address the disclosure issues arising from the discontinuation of the Serco case.

Following the decision to discontinue the SFO prosecution of individuals, I commissioned my senior team to assess our systems and processes, with the aim of identifying areas for improvement. In parallel to this, I commissioned an independent review, which is currently being conducted by Brian Altman QC. This Review is expected to report in May 2022.

The internal assessment work undertaken within the SFO was focused on two main themes, namely:

- A Disclosure Assurance Programme, and;
- Training and upskilling for SFO operational staff.

The Disclosure Assurance Programme involved a comprehensive review of disclosure on all our live/current cases with additional dip sampling and quality assurance testing. Our Heads of Division also conducted detailed assessments to ensure that issues similar to those that undermined the Serco prosecution were not affecting other cases. The Disclosure Assurance Programme also emphasised the need to continue with our plans to invest in technology to help us deal with the huge, and increasing, volumes of data involved in our cases. These immense volumes challenge our ability to ingest and review data expeditiously, while ensuring consistency in decision making. It has been and remains my plan to use the recent Spending Review outcome to invest in the technology to facilitate improvements in these areas.

The second strand of the internal assessment focused on training, as a result of which we have enhanced our disclosure training and rolled it out to all operational staff. This training, assured by the SFO General Counsel, herself an expert in this area, involves a continuing programme of learning including in a classroom style setting, as well as peer to peer review and sharing of



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best practice. We have reviewed and updated internal operational guidance on handling disclosure, which is now available to all staff.

I would like to assure you and all PAC members that I am committed to the SFO being an organisation that works to correct mistakes and identifies areas for improvement. The changes we have made to date demonstrate this. I look forward to the findings of the Altman Review and the AGO-led Calvert-Smith Review in due course, which may well identify other areas where we could further strengthen SFO disclosure handling processes.

I hope that my response addresses the concerns of the PAC members about this issue. In line with the PAC's recommendation 4b and as per my letter to you of 17 February 2022, I will write to you to share the Altman review outcomes and any recommendations made in that report. I will set out the SFO's response and plans to take the recommendations forward, once I have had time to consider them.

Yours sincerely

Lisa Osofsky
Director