

Impact Assessment, The Home Office

Title: Mandatory Reporting Duty for child Sexual Abuse

IA No: HO IA 0464

RPC Reference No: N/A

Other departments or agencies: Department for Health and Social Care; Department for Education; Department for Culture, Media and Sport; Department for Levelling Up, Housing & Communities; Ministry of Justice

Date: October 2023

Stage: Consultation IA

Intervention: Domestic

Measure: Primary legislation

Enquiries:

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RPC Opinion: RPC Opinion Status

Business Impact Target: Non qualifying provision

Cost of Preferred (or more likely) Option (in 2024/25 prices)

Net Present Social Value NPSV (£m)	-57.7	Business Net Present Value BNPV (£m)	-0.06	Net cost to business per year EANDCB (£m)	0.006
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What is the problem under consideration? Why is government intervention necessary?

The October 2022 Independent Inquiry report into Child Sexual Abuse demonstrated that when child sexual abuse is disclosed individuals and institutions have often failed to take appropriate action. This is just one aspect of a complex problem with underreporting of child sexual abuse which government is committed to addressing through its Tackling Child Sexual Abuse Strategy. To prevent child sexual abuse from happening, and to support more disclosures from victims and survivors, the government has committed to a mandatory duty to report child sexual abuse.

What is the strategic objective? What are the main policy objectives and intended effects?

Delivering the mandatory reporting duty links directly to the Home Office Outcome Delivery Plan 2021 priority of reducing crime. Alongside wider measures set out in the Tackling Child Sexual Abuse Strategy 2021, the duty is part of a whole-system approach to securing greater priority and focus across society on protecting children from child sexual abuse. The overarching strategic objective is to deliver a fundamental change to the way institutions identify and report child sexual abuse. Victims and survivors of child sexual abuse should have increased confidence that reports to a trusted adult will be believed, and action will be taken. The duty will also increase public knowledge and awareness of child sexual abuse.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Option 1: 'Do nothing'. As government accepted the Independent Inquiry's recommendation to introduce a mandatory reporting duty in England this option has been ruled out.

Option 2: Implement a mandatory reporting duty for child sexual abuse following the call for evidence findings.

Option 3: Implement a mandatory reporting duty as in option 2 with reference to a specific list of roles outlined, protection for reporters and potential exemptions from the duty.

Main assumptions/sensitivities and economic/analytical risks

Discount rate (%)

3.5

Sensitivities of the analysis are linked to an absence of data on the impact of the duty on reporting rates to the police and the ensuing effect of this on the criminal justice system. As well as the impact of the duty on social services and the effect of this on children in care. The uncertainty around the volumes is reflected in the wide range of costs estimated in the appraisal of these options and the use of indicative scenario testing to assess the impact on social services. If the estimated number of offences falls outside the current estimated ranges, this would have a significant impact on costs.

Will the policy be reviewed? It will be reviewed. **If applicable, set review date:** N/A

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible SELECT SIGNATORY: _____ Date: _____

Summary: Analysis & Evidence

Policy Option 2

Description: Implement a mandatory reporting duty for child sexual abuse covering 'positions of trust'

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	24/25	PV Base	24/25	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-18.5	High:	-101.1	Best:	-57.7	Best BNPV	-0.06	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	1.0	17.5	18.5	2.1	0.001
High	6.9	94.2	101.1	11.7	0.16
Best Estimate	3.7	54.0	57.7	6.7	0.06

Description and scale of key monetised costs by 'main affected groups'

It is estimated that Total costs are between **£18.5 million and £101.1 million (PV) with a central estimate of £57.7 million (PV)** over a 10-year appraisal period. **The majority of monetised costs are expected on the public sector driven by an increase in the cost of police investigations into child sexual abuse.** Costs to police are estimated between £15.8 million and £84.9 million (PV) with a central estimate of £48.7 million (PV) over 10 years.

Other key non-monetised costs by 'main affected groups'

A range of costs have been considered but due to a lack of evidence it has not been possible to monetise all. The main non monetised costs identified are to the Crown Prosecution Service (CPS) of prosecuting additional offences and an increase in costs to victim services of additional victims identified accessing support services. It is likely that these costs will increase with the volume of offenders being prosecuted. Additionally, due to an absence of data on training and training requirements, this has not been monetised. It is likely if training is required, this cost will increase

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	-	-	-	-	-
High	-	-	-	-	-
Best Estimate	-	-	-	-	-

Description and scale of key monetised benefits by 'main affected groups'

There are no monetised benefits of this intervention. A breakeven analysis has been provided to indicate how many crimes would need to be prevented to offset the monetised cost of the policy.

Other key non-monetised benefits by 'main affected groups'

Non-monetised benefits expected following the intervention include safeguarding children, increased feelings of reassurance in being believed, a reduction in offending and greater clarity around reporting.

BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m:										
Cost, £m	0.006	Benefit, £m	0	Net, £	-0.006					
Score for Business Impact Target (qualifying provisions only) £m:					N/A					
Is this measure likely to impact on trade and investment?					N					
Are any of these organisations in scope?			Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)					Traded:	n/a	Non-Traded:	n/a		

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 2)

Are all relevant Specific Impacts included?	N	Are there any impacts on particular groups?	Y
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Summary: Analysis & Evidence

Policy Option 3

Description: Implement a mandatory reporting duty as in option 2 with reference to a specific list of roles outlined, protection for reporters and potential exemptions from the duty

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2024/25	PV Base	2024/25	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-18.5	High:	-101.1	Best:	-57.7	Best BNPV	-0.06	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	1.0	17.5	18.5	2.1	0.001
High	7.3	94.2	101.4	11.7	0.16
Best Estimate	3.7	54.0	57.7	6.7	0.06

Description and scale of key monetised costs by 'main affected groups'

It is estimated that the impact of policy option 3 will fall largely on public sector driven largely by an increase in cost to the police of investigating new reports of child sexual abuse. Costs to police are estimated between £15.8 million and £84.9 million (PV) with a central estimate of £48.7 million (PV) over 10 years.

Other key non-monetised costs by 'main affected groups'

The non monetised costs identified relate to the Crown Prosecution Service (CPS) of prosecuting additional offences and an increase in victim services of additional victims identified accessing support services. It is likely that these costs will increase/decrease with the volume of offenders being prosecuted. Additionally, due to an absence of data on training and training requirements, this has not been monetised. It is likely if training is required, this cost will increase.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	-	-	-	-	-
High	-	-	-	-	-
Best Estimate	-	-	-	-	-

Description and scale of key monetised benefits by 'main affected groups'

It has not been possible to monetise additional benefits, above those in option 2 for this option.

Other key non-monetised benefits by 'main affected groups'

It is anticipated that the key non monetised benefits will be the intervention safeguarding children, increased feelings of reassurance in being believed, a reduction in offending and greater clarity around reporting. Any additional benefits could potentially be driven by the volume of professions and the type of professions in scope.

BUSINESS ASSESSMENT (Option 3)

Direct impact on business (Equivalent Annual) £m:										
Cost, £m	0.006	Benefit, £m	0	Net, £m	-0.006					
Score for Business Impact Target (qualifying provisions only) £m:					N/A					
Is this measure likely to impact on trade and investment?					N					
Are any of these organisations in scope?			Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)					Traded:	N/A	Non-Traded:	N/A		

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 3)

Are all relevant Specific Impacts included?	N	Are there any impacts on particular groups?	Y
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Evidence Base (for summary sheets)

A. Strategic objective and overview

A.1 Strategic objective

1. Implementing a mandatory duty to report child sexual abuse will deliver against a centrepiece recommendation in the final report of the Independent Inquiry into Child Sexual Abuse¹ (IICSA). Along with wider measures set out in the Tackling Child Sexual Abuse Strategy 2021,² the duty is part of a whole-system approach to securing greater priority and focus across society as a whole on protecting children from sexual abuse. The overarching strategic objective is to deliver a fundamental change to the way institutions identify and report child sexual abuse.
2. Delivering the mandatory reporting duty links directly to the Department's Outcome Delivery Plan 2021³ priority of reducing crime by contributing to the number of effective trials for child sexual exploitation, abuse and rape. Child sexual abuse has also been defined as a national threat in England and Wales by the Strategic Policing Requirement 2023.⁴

A.2 Background

3. Whether to introduce a mandatory reporting duty in England has been under consideration for a number of years, with such systems being introduced across a number of jurisdictions internationally. In 2015, the government established an inquiry (IICSA) to investigate the extent to which state and non-state institutions across England and Wales have failed in their duty of care to protect and safeguard children from sexual exploitation and abuse. Across seven years of investigation, the Inquiry considered four million pieces of evidence and gathered more than 6,000 individual stories and testimonies from victims and survivors. The Inquiry documented unacceptable cases of organisations and institutions failing to protect those in their care from child sexual abuse.
4. In its final report (October 2022),⁵ IICSA recommended that government introduce a mandatory duty for certain individuals to report cases of child sexual abuse. In April 2023, the government announced that it had accepted the recommendation and launched a call for evidence⁶ seeking views on how implementing a duty to report child sexual abuse is likely to impact children, organisations, and affected workforces and volunteers; as well as gather views on how different aspects of the duty could be implemented.
5. While many aspects of the evidence base underpinning this impact assessment (IA) are still under development, this consultation forms part of the continuing national conversation on this widespread and frequently underreported crime. The wide range of perspectives expressed in response to the call for evidence has affirmed the view that the delivery of a mandatory reporting duty needs to be undertaken with care and due regard to the needs of those impacted.

¹ The Report of the Independent Inquiry into Child Sexual Abuse | IICSA Independent Inquiry into Child Sexual Abuse: <https://www.iicsa.org.uk/reports-recommendations/publications/inquiry/final-report.html>

² Tackling Child Sexual Abuse Strategy 2021 (publishing.service.gov.uk): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/973236/Tackling_Child_Sexual_Abuse_Strategy_2021.pdf

³ Home Office Outcome Delivery Plan: 2021 to 2022 - GOV.UK: <https://www.gov.uk/government/publications/home-office-outcome-delivery-plan/home-office-outcome-delivery-plan-2021-to-2022>

⁴ Strategic Policing Requirement 2023 - GOV.UK: <https://www.gov.uk/government/publications/strategic-policing-requirement-2023>

⁵ The Report of the Independent Inquiry into Child Sexual Abuse | IICSA Independent Inquiry into Child Sexual Abuse: <https://www.iicsa.org.uk/reports-recommendations/publications/inquiry/final-report.html>

⁶ Mandatory reporting of child sexual abuse: call for evidence - GOV.UK: <https://www.gov.uk/government/consultations/mandatory-reporting-of-child-sexual-abuse/mandatory-reporting-of-child-sexual-abuse-call-for-evidence>

A.3 Groups affected

6. The mandatory reporting duty will apply to individuals in England undertaking regulated activity in relation to children under the Safeguarding and Vulnerable Groups Act 2006,⁷ and potentially people in positions of trust as defined by the Sexual Offences Act 2003 (SO 2003).⁸
7. The definition of ‘regulated activity’ with children in England is subject to a range of criteria (what the individual does and how often they do it, as well as where they do it). In some cases, whether the role is supervised must also be considered. Similarly, positions of trust are based on specific activities as well as the regularity with which they are carried out. Quantification of either group is therefore challenging, and an appropriate range of workforces have been used as a proxy in this assessment (see page.13).
8. The duty will provide any child or young person under the age of 18 with assurance that any report they make relating to child sexual abuse will be reported to an appropriate investigating authority.

A.4 Consultation

Within government

9. The Home Office worked closely with a range of departments to develop the government’s response to the IICSA.⁹ The departments most significantly involved in the development of the mandatory reporting proposals include: the Department for Education, the Department of Health and Social Care (DHSC), the Department for Culture, Media and Sport, the Ministry of Justice and the Crown Prosecution Service.

Public consultation

10. In developing the mandatory reporting recommendation, the IICSA consulted with a wide range of stakeholders. A full list of core participants to the Inquiry can be found online.¹⁰
11. In addition, the government undertook a public call for evidence¹¹ between 22 May and 14 August 2023. As well as members of the public, views were particularly sought from: police officers; local authorities (including children’s social care workers); NHS England; Directors of Public Health and Integrated Care Boards; inspectorates and regulators; education settings and workforce (including Early Years and Further Education); children’s activity settings and workforces (for example, children’s sports, drama, arts, and music clubs); civil society and youth organisations (charities, voluntary, community and social enterprises); academics and research institutions (including What Works Centres; and various professional organisations and representative bodies (for example, the Royal College of Paediatrics and Child Health, the BMA etc.).

B. Rationale for intervention

12. As the Tackling Child Sexual Abuse Strategy (2021)¹² sets out, “whilst the impact of child sexual abuse on victims and survivors can vary significantly, there is strong evidence that child sexual abuse is associated with an increased risk of adverse outcomes in many areas of a person’s life. This can include physical, emotional, and mental wellbeing, relationships, socioeconomic outcomes, and vulnerability to revictimization.” Child sexual abuse also has an impact on society and the economy more widely, including pressure on the criminal justice system, healthcare, and social services. The

⁷ Safeguarding Vulnerable Groups Act 2006 (legislation.gov.uk): <https://www.legislation.gov.uk/ukpga/2006/47/contents>

⁸ Sexual Offences Act 2003 (legislation.gov.uk): <https://www.legislation.gov.uk/ukpga/2003/42/contents>

⁹ Response to the final report of the Independent Inquiry into Child Sexual Abuse:

<https://www.gov.uk/government/publications/response-to-the-final-report-of-the-independent-inquiry-into-child-sexual-abuse>

¹⁰ A full list of core participants to the IICSA:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20221215035522/https://www.iicsa.org.uk/key-documents/797/view/list-core-participants-august-2022.pdf>

¹¹ Mandatory reporting of child sexual abuse: call for evidence - GOV.UK:

<https://www.gov.uk/government/consultations/mandatory-reporting-of-child-sexual-abuse/mandatory-reporting-of-child-sexual-abuse-call-for-evidence>

¹² Tackling Child Sexual Abuse Strategy 2021 (publishing.service.gov.uk):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/973236/Tackling_Child_Sexual_Abuse_Strategy_2021.pdf

Home Office published a report¹³ estimating the economic and social costs of contact child sexual abuse which estimates the financial and non-financial (monetised) cost relating to all victims who continued to experience contact sexual abuse, or who began to experience contact sexual abuse, in England and Wales in the year ending 31 March 2019. This was estimated to be at least £10 billion and includes the costs of this cohort being victimised in previous and future years, in addition to lifetime consequences as a result of experiencing child sexual abuse.

13. Across seven years of investigation, IICSA heard the important testimonies and lived experience of over 7,300 victims and survivors as well as considering the government's 2016 consultation on mandatory reporting of abuse and neglect¹⁴. The evidence it considered, which ranged from historical to contemporary accounts, demonstrated that when abuse was disclosed individuals and institutions often thought children were lying. In some cases, reputational concerns were prioritised over the safety of children, despite allegations or actual knowledge of sexually abusive behaviour. In others, a culture of indifference led to a succession of missed opportunities to intervene in the life of a vulnerable child. Some victims testified to being mocked and bullied by safeguarding professionals when they directly disclosed details about the sexual abuse they suffered. Many more set out that inadequate and negative responses to their disclosures meant they never wanted to talk about their experiences again.
14. There is a persistent problem with underreporting of child sexual abuse which the government is committed to addressing through its Tackling Child Sexual Abuse Strategy¹⁵. In 2015, the Children's Commissioner reported¹⁶ that just one in eight children who are sexually abused are identified by professionals, noting that this may be because professionals do not have a good enough understanding of the signs of child sexual abuse and lack the confidence and skills to talk about it. Similarly, there are many reasons that a victim or survivor of child sexual abuse may choose not to disclose what happened to them; including fear, embarrassment and concern that they would not be believed.
15. To prevent child sexual abuse from happening in the first place, and to support more disclosures from victims and survivors, the government must play a central role in challenging the silence around child sexual abuse. Alongside the introduction of a mandatory reporting duty, the government will continue to raise awareness, deploying government communications in different forums, to help prevent child sexual abuse and protect children and young people.

C. Policy objective

16. The main objective of the mandatory reporting duty is to ensure the child protection system works as effectively as possible to keep children safe from sexual abuse. Where such abuse does occur, the aim is to ensure that it is identified as soon as possible and that the right action is taken to protect the child or children involved and prevent further harm from occurring. This should increase the confidence of victims and survivors feel in knowing that when they make a report to a trusted adult, they will be believed, and that action will be taken. In addition, the introduction of the duty will help increase knowledge and awareness of child sexual abuse across society.
17. Success of these outcomes will be measured through monitoring relevant data from professional organisations. Data should also indicate whether there is an increase in the number of children reporting abuse to the police and/or on child protection plans.

¹³ The economic and social cost of contact child sexual abuse - GOV.UK: <https://www.gov.uk/government/publications/the-economic-and-social-cost-of-contact-child-sexual-abuse>

¹⁴ Reporting and acting on child abuse and neglect: <https://www.gov.uk/government/consultations/reporting-and-acting-on-child-abuse-and-neglect>

¹⁵ Tackling Child Sexual Abuse Strategy 2021 (publishing.service.gov.uk): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/973236/Tackling_Child_Sexual_Abuse_Strategy_2021.pdf

¹⁶ Protecting children from harm | Children's Commissioner for England (childrenscommissioner.gov.uk): <https://www.childrenscommissioner.gov.uk/resource/protecting-children-from-harm/>

D. Options

18. The government accepted the Independent Inquiry's recommendation to introduce a mandatory reporting duty in England, and through a call for evidence sought further views in order to develop an effective operational model for the reporting system. A 'do nothing' option has therefore been decided against.
19. The consultation seeks views on the Home Office proposed approach to implementation and outlines the following specific questions:
 - In addition to the definition of 'regulated activity in relation to children' provided by the Independent Inquiry, the Government is proposing to set out a list of specific roles which should be subject to the mandatory reporting duty. Which roles do you consider to be essential to this list?
 - What would be the most appropriate way to ensure reporters are protected from personal detriment when making a report under the duty in good faith; or raising that a report as required under the duty has not been made?
 - In addition to the exception for consensual peer relationships, are there any other circumstances in which you believe individuals should be exempt from reporting an incident under the duty?
 - We are proposing that there would be criminal sanctions where deliberate actions have been taken to obstruct a report being made under the duty. What form of criminal sanction would you consider most appropriate? And should situations where a reporter has been obstructed due to active indifference or negligence also be subject to these sanctions?
 - We would like to test the view that professional and barring measures apply to those who fail to make an appropriate report under the duty. Do you agree with this approach? Would different situations merit different levels or types of penalty?
 - Are there any costs or benefits which you think will be generated by the introduction of the proposed duty which have not been set out in the attached impact assessment?
 - In light of the proposals outlined in this paper, what are the key implementation challenges and solutions reporters and organisations will face?

In line with the consultation the options assessed in this IA are as follows:

- a. **Option 1: 'Do nothing'**. This option involves business as usual which in this case is the same as do nothing option. As the government has accepted the Independent Inquiry's recommendation to introduce a mandatory reporting duty in England this option has been ruled out. The consultation asks questions on the Home Office proposed approach to the implementation of an agreed commitment.
- b. **Option 2: Implement a mandatory reporting duty for child sexual abuse covering 'positions of trust'**. This option involves implementing the Duty by reference to the position of trust legislation, SO 2003. The duty to act is confined to direct disclosures from a child or a perpetrator and child sexual abuse is interpreted as any act that would be an offence under SO 2003 and where the alleged perpetrator is in a position of trust within the meaning of SO 2003. This option also includes professional sanctions for non-reporting and criminal sanctions for people who seek to obstruct a reporter from fulfilling their mandatory reporting duty.
- c. **Option 3: Implement a mandatory reporting duty as in option 2 with reference to a specific list of roles outlined, protection for reporters and potential exemptions from the duty**. This option differs from option 2 as it involves implementing the duty by reference to a specific list of roles rather than legislated 'positions of trust', includes protections for reporters and potential exemptions to the duty.

E. Appraisal

Appraisal

20. This IA accompanies the Consultation on Mandatory Reporting. The consultation follows a call for evidence and consequently is narrow in scope with limited differences between options. A proportionate approach has been taken to appraising the options, with non-monetised costs for options 2 and 3 presented in paragraphs 75–80 and paragraph 96.
21. The main assumptions and data sources used in this IA are listed below, with more detail on the cost and benefit assumptions given in the relevant sections. The net present social value (NPSV) is estimated over ten years using a 3.5 per cent discount rate, in line with HM Treasury Green Book guidance. The appraisal starts in the financial year 2024/25, with costs also presented in this year.¹⁷
22. The effects of **Option 2 and 3** are modelled relative to the counterfactual ‘Do-nothing’¹⁸ baseline. In essence, an option’s costs and benefits are those that only exist because of that option being chosen over doing nothing, with **Option 1 ‘Do nothing’** having zero costs and zero benefits by definition. In its simplest form, the modelling compares the change in the reporting of child sexual abuse following the intervention and how these changes filter down through the criminal justice system (CJS).
23. Primary data gaps surround the effect of the intervention on reporting. There is uncertainty on how this intervention will impact police reporting rates, referral rates to social services and the number of children in care.
24. Due to limited data, assumptions have been made to estimate the current effect of the intervention on reporting rates of child sexual abuse, referrals to social services and children in care. Over the past 10 years, reporting rates for child sexual abuse have increased. The base counterfactual volume of reporting is based on the average reporting rate over the past five years. However, these rates may over or underestimate the actual rate.
25. The rounded convention employed in this IA is as follows: values under 1000 are rounded to the nearest 5; values in the 1000s rounded to the nearest 100; values in 100,000 rounded to the nearest 1000. Values in the millions are given to one decimal point. Percentages are not rounded.
26. All volume estimates given are kept constant through-out the appraisal.

Volume

Current reporting of child sexual abuse

27. Police Reported Crime (PRC) data is used to estimate current reporting of child sexual abuse to the police. Within PRC a subset of offence codes is used to identify child sexual abuse where it can be most certain that the victim was a child. This will underestimate some instances of child sexual abuse where the offence code itself does not denote the age of the victim. These codes are detailed in the annexes.
28. For the year ending March 2023 approximately 102,000 child sexual abuse offences were reported for England and Wales. To estimate the current effects for 2024/25 historical data has been used to estimate the baseline reporting rates.¹⁹ For the year ending March 2021, PRC for child sexual abuse increased by approximately one per cent on the previous year, forming the basis of the low estimate. Between March 2020 and the year ending March 2023, PRC for child sexual abuse has increased on average by approximately five per cent per year, this forms the high estimate for compound growth. The central estimate takes the midpoint between the high and low estimate, approximately three per cent. This gives volumes for England and Wales ranging between 105,000 to 113,000 with a central estimate of 108,000.

¹⁷ HM Treasury (2022), *The Green Book*. Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063330/Green_Book_2022.pdf

¹⁸ HM Treasury (2022), *The Green Book*. Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063330/Green_Book_2022.pdf

¹⁹ ONS (2023), *Crime in England and Wales: Appendix tables*. Available here: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/crimeinenglandandwalesappendixtables>

29. To estimate volume figures for England these figures have been adjusted by the relevant population proportions (95%) resulting in a baseline range of child sexual abuse offences of 100,000 to 107,000, with a central estimate of 103,000.²⁰

Effect of Intervention - Criminal Justice System

30. It is assumed that there will be an increase in reporting to police as a result of the duty. This increase will be over and above the baseline rate. This assumption is based on an increased awareness of the duty as a result of publicity leading to an increase in precautionary reporting around 'direct disclosures.' It is further assumed that this increase will be relatively small because there is already an existing statutory duty for safeguarding professionals to report child sexual abuse, the new duty turns this into a mandatory duty. The duty also allows for reporting to the police or social services. Some professionals may feel more comfortable reporting to social services, this is estimated later in this IA but means that the impact may well be seen across bodies.
31. It is assumed that the increase will range from 0.1 per cent and 0.5 per cent, with a central estimate of 0.3 per cent. There is no published evidence to base this assumption on, but this assumption was informed through discussion with Home Office analysts and policy colleagues. These estimates are presented in Table 1.

Table 1: Low, central and high estimates of the volume of additional child sexual abuse offences reported to the police following intervention

England only	Low	Central	High
Estimated volume of child sexual abuse reports 2024/25	100,000	103,000	107,000
Estimated percentage increase in child sexual abuse offences recorded by the Police	0.1	0.3	0.5
Estimated additional child sexual abuse offences recorded by the police	100	310	540

Source: Home Office internal estimates. Data used to calculate these estimates can be found in the footnotes.^{21 22}

32. The cost of the extra reported crimes is assessed in relation to their effect on the CJS including prison places, legal aid costs and HM Courts and Tribunals Service.

Effect on the CJS

33. As outlined in paragraph 31 it is assumed that there will be an increase in reporting of child sexual abuse. To understand the effect that an increase in reporting will have on the CJS, Ministry of Justice (MoJ) criminal justice statistics have been used to inform projections based on average number of cases proceeded against, the average proportion of cases heard in Crown and Magistrates Courts and on the average proportion of cases resulting in immediate custodial sentencing.²³
34. Using aggregate offence level data, it is assumed that seven per cent²⁴ of police recorded crimes are charged and then proceeded against in either Magistrates or Crown Court. Of those, 35 per cent of cases are tried in Magistrates Courts and 50 per cent are tried in Crown Court, the remaining 15 per cent are tried in Magistrates court but discharged, withdrawn or charge dismissed. It is assumed that of the cases tried in Magistrates Courts five per cent result in an immediate custodial sentence

²⁰ Figures have been rounded.

²¹ ONS (2023) Crime in England and Wales: Appendix tables. Available here:

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/crimeinenglandandwalesappendixtables>

²² ONS (2022). Population estimates for the UK, England, Wales, Scotland and Northern Ireland: mid-2021. Available here:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/latest>

²³ It is not possible to individually track cases through the CJS as time periods vary for cases, but the MoJ quarterly statistics provide a good basis to estimate forward in the absence of direct data.

²⁴ Ministry of Justice (2023), CJS statistics quarterly: December 2023. Available here:

<https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-december-2022>

and of those tried in Crown Court, 42 per cent result in an immediate custodial sentence. These estimates are presented in Table 2.

Table 2: Low, central and high estimates of the volume of new child sexual abuse offences progressing through the CJS after intervention

Volume of child sexual abuse in the CJS, England only	Low	Central	High
Estimates of new child sexual abuse offences reported to the police in 2024/25	100	310	540
<i>Estimated percentage of reported defendants proceeded against</i>	7	7	7
Estimated volume of defendant proceeded against	7	20	40
<i>Percentage of defendants tried in Magistrates Court</i>	35	35	35
<i>Percentage of defendants tried in Magistrates Court but discontinued</i>	15	15	15
Estimated volume of defendants tried in Magistrates Court	4	10	20
<i>Percentage given custodial sentences in Magistrates Court</i>	5	5	5
Estimated volume of offenders given custodial sentences in Magistrates Court	0	0	1
<i>Percentage of defendants tried in Crown Court</i>	50	50	50
Estimated volume of defendants tried in Crown Court	4	10	20
<i>Percentage of offenders given custodial sentences in Crown Court</i>	42	42	42
Estimated volume of offenders given a custodial sentence in Crown Court	2	5	9

Source: Home Office estimates, 2023. Data used to calculate these estimates can be found in the footnotes.^{21 22 24}

Social Care and Local Authorities

35. Evidence indicates that the introduction of a duty may lead to an increase in referrals.^{25,26} Due to limitations in the evidence base it is not possible to estimate the exact nature of the increase. Instead, three indicative scenarios have been undertaken - low, central and high - to understand the range of effects that the intervention might have. The main assumption employed is the percentage increase in referrals that will ensue as a result of the implementation of the duty. The percentage increase used for each scenario is based on consultation with Home Office and DHSC analysts alongside Home Office policy colleagues.

Estimates of Current Referrals

²⁵ Impact of new mandatory reporting law on reporting and identification of child sexual abuse: A seven-year time trend analysis, Matthews and others, Journal of Child Abuse and Neglect. Article can be found here: <https://webarchive.nationalarchives.gov.uk/ukgwa/20221215003205/https://www.iicsa.org.uk/key-documents/29734/view/INQ006359.pdf>

²⁶ Independent Inquiry Child Sexual Abuse (2022), The Report of the Independent Inquiry into Child Sexual Abuse. Available here: https://webarchive.nationalarchives.gov.uk/ukgwa/20221215051709/https://www.iicsa.org.uk/key-documents/31216/view/report-independent-inquiry-into-child-sexual-abuse-october-2022_0.pdf

36. The estimated total volume of referrals for child sexual abuse is based on the average volume of referrals identified as child sexual abuse at the end of assessment by social workers (2018 to 2022)²⁷ combined with the average percentage of referrals not taken forward. It is estimated that the average volume of referrals identified as child sexual abuse at the end of the assessment only represents a portion of total referrals. To estimate total volumes the average percentage of referrals that are not taken forward (37%) for all abuse types is used.²⁸ Due to the absence of evidence, an assumption is made that the proportion of referrals not taken forward for child sexual abuse is the same as the overall proportion of referrals not taken forward. This is comprised of 'referrals which resulted in an assessment and the child was assessed not to be in need' (29%) and 'referrals which resulted in no further action' (7%).^{29,30}

Effect of Intervention on Referral Rates

37. It is assumed that there will be some increase in referrals due to the mandatory nature of the duty. However, as an existing duty is already in place for safeguarding professionals to report suspected child sexual abuse it is not anticipated to be a large increase. Due to an absence of evidence on the magnitude of the increase a high estimate is assumed as an increase of three per cent; two per cent for the central estimate and one per cent for the low estimate. Table 3 contains the data on estimated effect for the scenarios that have been considered.

Table 3: Low, central and high estimates of the volume of referrals to Social Services

	Low	Central	High
Estimated total volume of referrals for child sexual abuse ³¹	78000	78000	78000
Percentage increase in child sexual abuse referrals as a result of intervention	1	2	3
Estimated increase in child sexual abuse referrals (volume)	780	1,600	2300
Estimated number of children assessed not to be in need	390	620	690
Estimated volume where referrals result in no further action	390	370	175
Volume of children assessed as child sexual abuse at end of assessment and processed through Social service system (new 2024/25)	0	575	1500

Source: Home Office internal estimates 2023. Data used to calculate these estimates can be found in the footnotes ³¹. Figures may not sum due to rounding

38. It is assumed that some of the new increase in reporting will be precautionary in nature. There is uncertainty around the scale of precautionary reporting. To account for this, assumptions have been made around the rate of precautionary reporting and the effect of this on the volume of children assessed as child sexual abuse at the end of the assessment and who are processed through the Social Service system such that for the low estimate it is assumed that 100 per cent of referrals are precautionary and do not result in a net increase in child sexual abuse referrals being processed through the social services system. For the central estimate it is assumed that 63 per cent of new

²⁷ To mitigate against any effect that COVID-19 may have had on Social Services resourcing between 2020 to 2021, averages have been used to inform baseline estimates for the counterfactual for 2024/25.

²⁸ The average proportion of referrals not taken forward is approximately 37 per cent or (3/8). To obtain the total volume of child sexual abuse referrals the average volume of referrals identified as child sexual abuse at the end of Assessment by social workers (2018 to 2022) is divided by one minus the percentage of referrals that are not taken forward (50,000/1-0.37%)

²⁹ Department for Education, Characteristics of children in need (2022) available here: : <https://explore-education-statistics.service.gov.uk/find-statistics/characteristics-of-children-in-need>

³⁰ Referrals not taken forward cover all age groups.

referrals are not taken forward and for the high estimate it is assumed that as before 37 per cent of new referrals are not taken forward.

Current volume of Looked after Children due to child sexual abuse

39. To estimate the current volume of looked after children due to child sexual abuse, data on the number of 'children looked after' is combined with data on the proportion of 'children looked after' due to abuse and neglect (63%).³² To estimate the proportion of children looked after due to child sexual abuse, it is assumed that 37 per cent of all children categorised as being 'looked after' due to abuse and neglect are looked after due to child sexual abuse. This assumption uses data on the average proportion of children 'identified as experiencing child sexual abuse at the end of assessment by social workers.'³³

Table 4: Estimates of children looked after due to child sexual abuse

Average volume of all children looked after in England	79,000
Proportion of children looked after due to abuse and neglect	63%
Average volume of children looked after due to abuse and neglect	51,000
Assumed proportion of children assessed as child sexual abuse that are 'looked after' current estimate	37%
Estimated volume of looked after children	18,200

Source: Home office internal estimates 2023. Data used to calculate these estimates can be found in the footnotes ³². Figures have been rounded. Percentages are not rounded

Effect on volume of Looked after Children due to child sexual abuse

40. To estimate the likely indirect effect of an increase in referrals on the number of 'looked after children' and to reflect the uncertainty in estimating the effect of an increase in referrals on the number of looked after children, a range has been used. The low estimate assumes that an increase in referrals will result in zero new children being placed in care. The central estimate assumes that 19 per cent of children assessed as child sexual abuse at the end of assessment will be 'looked after.' The high estimate assumes that 37 per cent of children assessed as child sexual abuse at the end of assessment go on to be looked after. This assumption is used in conjunction with volume estimate for net increase in child sexual abuse referrals to estimate the effect on looked after children in the high, central and low scenarios.

Table 5 – Low, central and high volume estimates of 'looked after children'

	Low	Central	High
Volume of looked after children due to child sexual abuse, mandatory reporting	0	105	545

Source: Home Office internal estimates 2023. Data used to calculate these estimates can be found in the footnotes ³²

Option 2 costs and benefits

COSTS

Set-up costs – Familiarisation costs with new mandatory reporting guidance

41. Familiarisation costs are the opportunity cost to businesses and organisations of the time spent reading and comprehending new guidance/legislation issued. Familiarisation costs are estimated as:

$$\text{Time taken to read the legislation} \times \text{wage rate} \times \text{volume of people reading.}$$

³² Department for Education, Children Looked after in England including adoptions 2022, Available here: <https://explore-education-statistics.service.gov.uk/find-statistics/children-looked-after-in-england-including-adoptions>

³³ Department for Education, Characteristics of Children in need (2022) available here: <https://explore-education-statistics.service.gov.uk/find-statistics/characteristics-of-children-in-need>

42. It is estimated that any guidance issued on the duty will range between 10-90 words with a central estimate of 50 words.³⁴ At a reading speed of 400 words per minute, with a range of 200 to 700 words per minute.³⁵ It is estimated that it will take between 0.01 minutes and 1.63 minutes, with a central estimate of 0.65 minutes. The duty applies to a range of professions undertaking regulated activity with children.
43. Estimates for volume of staff affected are based on staff working across healthcare, social work, teaching and probationary services.³⁶ It is assumed that between 100 per cent (high estimate) and 80 per cent of staff (low estimate) with a central estimate of 90 per cent of staff reading the guidance. The narrow range is informed by the mandatory nature of the duty. It is estimated that between 1.7 million and 2.2 million individuals will read the guidance with a central estimate of 2.0 million. Annual median hourly wage data by occupation published by the ONS³⁷ is uplifted by 22 per cent to account for non-wage costs.^{38,39} These estimates are presented in Table 6. Table 6 presents costs for public and private sector combined. Section H of this document separates out costs to businesses.

Table 6: Professions affected and annual median hourly wage (£)

Professionals	Volume of staff reading guidance	median wage (£)
Social workers	136,000	20
Director of children's services	137	35
Housing officers	30,200	15
Childminders	30,500	10
Staff in group based/ sessional/full day care provision	223,000	10
Teachers	516,000	25
Teaching Assistant	365,000	15
Police officers and staff	203,000	20
GPs	32,600	25
Nurses, midwives, and health visitors	351,000	20
Paramedics	17,700	25
Staff working Youth Custody Services	1,300	20
Probation service staff	15,300	20
Paediatricians	8,700	35
Care home assistants	25,000	10
Care home managers	8,600	10
Total for 90% of staff reading guidance	2.0 million	

³⁴ This is a policy assumption on the length of guidance that will be issued around the duty.

³⁵ Words per minute estimates for paper and screen reading, Readingsoft. Available here: <http://www.readingsoft.com/> This is using words per minute estimates of 200, 400 and 700.

³⁷ ONS (2022), Employee earnings in the UK: 2022. Available here: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/bulletins/annualsurveyofhoursandearnings/latest>

³⁸ An uplift figure of 22 per cent has been used where the majority of staff work in the public sector, for those professions which largely fall in the private sector such as Staff in group based/sessional/full day care provisions an uplift of 17 per cent has been included.

³⁹ ONS (2020) Index of labour Costs per Hour, seasonally adjusted. Available here: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/indexoflabourcostsperhourilchseasonallyadjusted>

Source: Home Office internal estimates 2023. See annex for data used to estimate profession volumes. Figures may not sum due to rounding.

44. It is estimated that the total familiarisation cost ranges between **£9,400 and £1.3 million** with a central estimate of **£480,000**.

Set up costs: Cost of Prison Place

45. To account for low prison capacity, a one-off set up cost of £250,000 per new prison place required is included as an indicative estimate. These costs only apply in year three of the appraisal period as prison places can be reused in future years.
46. The £250,000 unit cost is multiplied by the additional defendants sentenced to a custodial sentence as presented in Table 2. This is estimated to be between zero and one defendants in Magistrates Court and between two and eight defendants in Crown Court. The average length of sentence served is also accounted for to estimate how many times a prison place can be reused. This is estimated to be just under three months on average for Magistrates courts and just over 35 months on average for Crown Court. A time⁴⁰ lag of three years is included to account for the time lag between an offence being committed and sentencing.⁴¹
47. Prison Set up Costs are estimated to be between **£1.0 million and £5.6 million (PV)**, with a central estimate of **£3.2 million PV** (2024/25 prices).

Set-up Costs -Total Costs

48. Set up costs in total are estimated to be **between £1.0 million and £6.9 million** with a **central estimate of £3.7 million (PV)** (2024/25 prices).

Ongoing and Ongoing Total Costs (Private and Public)

Ongoing Costs: Police Costs

49. It is estimated that there will be an ongoing cost to the police following an increase in reporting of child sexual abuse. This increase is presented in Table 2 and is between 100 and 540 new reports each year. These estimates are combined with data from CSEW on proportion of child sexual abuse rape offences and those categorised as other sexual abuse. It is estimated that 27 per cent of child sexual abuse offences are categorised as rape and 73 per cent as other sexual offences.⁴²
50. The estimated police costs for investigating child sexual abuse rape offences is obtained from the Economic and Social Cost of Contact Child Sexual Abuse.⁴³ The unit cost for rape is estimated to be £29,800 (2024/25 prices) and the unit cost for other sexual offences is estimated to be £14,300 (2024/25). It should be noted that these estimates only relate to contact abuse and do not include estimates for costs associated with non-contact/indecent image of children offences for which there are no equivalent figures. Given the absence of data in this space the costs for contact abuse are used as proxy for both contact and non-contact sexual abuse and these figures have been applied to all child sexual abuse cases. This may over or underestimate the true police costs.
51. Police costs are estimated to be between **£15.8 million and £84.9 million (PV)** with a central estimate of **£48.7 million (PV)** over a 10-year appraisal period.

Ongoing Court Costs

⁴⁰ Ministry of Justice (2023), *Criminal Justice System statistics quarterly: December 2023*. Available here: <https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-december-2022>

⁴¹ Based on internal Home Office documents. It is estimated that in Q4 2022 Contact child sexual abuse offences in England and Wales on average (median) took 838 days from offence to completion in the Crown Court, whilst Indecent and Prohibited Images of Children (IIOC) offences took 777 days.

⁴² ONS (2019), *Child Sexual Abuse in England and Wales: year ending March 2019*. Available here: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/childsexualabuseinenglandandwales/yearendinmarch2019> and ONS *Child Sexual abuse in England and Wales. Appendix tables*. Available here: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/childsexualabuseappendixtables>

⁴³ Home Office (2021), *The economic and social cost of contact child abuse*. Available here: <https://www.gov.uk/government/publications/the-economic-and-social-cost-of-contact-child-sexual-abuse/the-economic-and-social-cost-of-contact-child-sexual-abuse>

52. It is estimated that there will be additional costs to the courts following an increase in reporting of child sexual abuse, which are then tried in court. The increase is presented in Table 2. It is estimated that between 7 and 40 offences are proceeded against of which between 4 and 20 offences will be tried in Magistrate Court and between 4 and 20 will be tried in Crown Court.
53. Unit cost for both courts have been provided by the MoJ and inflated to 2024/25 prices. A 20 per cent optimism bias adjustment has been applied to the unit cost to account for the uncertainty in the estimates.⁴⁴
54. Court costs are estimated to be between **£0.2 million and £1.2 million with a central estimate of £0.7 million (PV)** over a 10-year appraisal period.

⁴⁴ Optimism bias has been included in line with guidance provided by MoJ

Ongoing Legal Aid Costs

55. There will be additional costs to the Legal Aid Agency (LAA) following an increase in reporting of child sexual abuse offences that are then tried in court.
56. It is estimated that 60 per cent of offenders appearing in Magistrates courts will be eligible for legal aid and 100 per cent of offenders in Crown Court.⁴⁵ Unit costs for both courts have been provided by the MoJ and inflated to 2024/25 prices.⁴⁶
57. For police stations it is estimated that 60 per cent of offenders are eligible for legal aid. These estimates have been provided by the MoJ. Unit cost for police have been provided by the MoJ and inflated to 2024/25 prices.⁴⁷
58. Legal Aid costs are estimated to be between **£0.4 million and £2.4 million**, with a central estimate of **£1.4 million** (PV) over a 10-year appraisal period.

Ongoing Prison Costs

59. There will be additional costs to the prison service following an increase in reporting of child sexual abuse cases, which are then tried in court and lead to a custodial sentence.
60. Using MoJ data on offences outlined in paragraph 35 it is estimated that the average custodial sentence served in Magistrates Courts is three months and for Crown Court the average sentence is served is 32 months.
61. The monthly unit cost is calculated using data on annual costs per prison place, estimated to be £31,000 (2020/21).⁴⁸ This is inflated to 2024/25 prices, divided by 12 months and a 20 per cent optimism bias is applied in line with MoJ guidance.⁴⁹ This results in an estimated annual cost of a £41,000 and a monthly cost per prison place of £3,400 (2024/25).
62. The monthly unit cost is multiplied by the average sentence served and the estimated volume of offenders that have received a custodial sentence.
63. As noted in paragraph 47 a time lag of three years is included to account for the length of time taken between a child sexual abuse crime being committed and a custodial sentence imposed.
64. Ongoing prison costs are estimated to be between £1.0 million and £5.6 million with a central estimate of £3.2 million (PV) over a 10-year appraisal period.

Total Ongoing Costs

65. Excluding costs associated with indicative scenario testing outlined in paragraphs 67 to 70 total ongoing costs are estimated to be between **£17.5 million and £94.2 million** with a central estimate of **£54.0 million** (PV) over a 10-year appraisal period.

⁴⁵ Ministry of Justice (2022), internal estimates provided by MoJ 2023

⁴⁶ HMT (2023), *GDP deflators at market prices, and money GDP June 2023 (Quarterly National Accounts)*. Available here <https://www.gov.uk/government/statistics/gdp-deflators-at-market-prices-and-money-gdp-june-2023-quarterly-national-accounts>

⁴⁷ HMT (2023), *GDP deflators at market prices, and money GDP June 2023 (Quarterly National Accounts)*. Available here: <https://www.gov.uk/government/statistics/gdp-deflators-at-market-prices-and-money-gdp-june-2023-quarterly-national-accounts>

⁴⁸ Ministry of Justice (2022), *Cost per place and costs per prisoner by individual prison*. Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1050046/costs-per-place-costs-per-prisoner-2020-2021.pdf

⁴⁹ HMT (2023), *GDP deflators at market prices, and money GDP June 2023 (Quarterly National Accounts)*. Available here: <https://www.gov.uk/government/statistics/gdp-deflators-at-market-prices-and-money-gdp-june-2023-quarterly-national-accounts>

Scenario Testing – Social Services Cost and Kept Children

Ongoing Cost to Social Services

66. Two indicative scenarios tests have been conducted to understand the range of impacts that could ensue from an increase in referrals to Social Services and the resulting effect on children in care. The existing evidence base has been used to construct these scenarios, with a risk that these estimates may over or underestimate the proportion of overall referrals that will continue to be taken through the social care system and the effect on local authorities kept children services. For this reason, these estimates are not included in the overall NSPV calculations.
67. It is estimated that there will be an increase in costs to social services following an increase in referrals. The estimated increase in referrals is presented in Table 7 and are estimated to be between 780 and 2300, the associated assumptions are outlined in paragraphs 37 to 38.
68. It is estimated that the total average unit cost for processing a case through social services management processes is £1,800.⁵⁰ It is estimated that the total average unit cost for processing a referral which results in no further action is £340. It is estimated that the total average cost where a child is assessed not to be in need is £755. All unit costs are presented in 2024/25 price years.
69. The unit costs are combined with the volume estimates found in Table 7 for volume of cases where no further action is required after initial consideration. Volume of new cases where child is initially assessed and determined not be in need and volume of new cases continuing through the social care system after initial assessment are presented below:

Table 7: Low, central and high volume estimates for child sexual abuse referrals to Social Services

	Unit Cost	Volume Estimate		
		Low	Central	High
New estimated increase in child sexual abuse referrals (volume)		780	1,600	2,300
Volume of cases where no further action required after initial consideration ⁵¹	£340	390	370	175
Volume of new cases where child initially assessed and determined not to be in need	£755	390	620	690
Volume of new cases continuing through the social care system after initial assessment	£1,800	0	575	1,500

Source: Home Office internal estimates. Data used to calculate these estimates can be found in the footnotes⁵². Figures may not sum due to rounding.

70. It is estimated that the total increase in managing new referrals may range from **£3.7 million to £26.0 million** with a central estimate of **£13.1 million (PV)** over a 10-year appraisal period.

⁵⁰ The estimate is based on research undertaken by the Centre for Child and Family Research at Loughborough University which collected detailed social care activity data from Local Authorities using a sample of 60 Children between 1st October 2008 and 31st March 2009. The original estimate of (£1,416) has been uplifted for inflation. The estimate can be found here: Impact Assessment - Possible new requirements relating to reporting and acting on child abuse (publishing.service.gov.uk): https://assets.publishing.service.gov.uk/media/5a817d9940f0b62305b8f3ba/Impact_Assessment_-_Consultation_Stage_web_.pdf

⁵¹ Initial consideration (but no assessment)

⁵² Department for Education, Characteristics of Children in need (2022) available here: <https://explore-education-statistics.service.gov.uk/find-statistics/characteristics-of-children-in-need>

Ongoing Cost to Children in Care

71. It is estimated that there will be an increase in costs to children in care⁵³ resulting from an increase in referrals where a child has been identified as being in need of help/protection as a result of risk to their development/health.
72. Data from 251 expenditure returns from local authorities in 2013-2014 are used to estimate annual spending per looked after child. It is estimated that in 2013-2014 spending on average per looked after child was £53,000.⁵⁴ This figure is inflated to 2024/25 price year,⁵⁵ resulting in a unit cost of £68,500 per year. The unit cost is multiplied by the estimated increase in volume of looked after children found in Table 5. It is estimated that between 0 and 545 with a central estimate of 105 additional children looked after per year due to an increase in referrals to social services as a result of implementing the duty.
73. It is estimated that the total increase in managing additional looked after children **may range between £0.0 million and £322.8 million** with a central estimate of **£62.6 million (PV)** over a 10 year appraisal period.

Non-monetised costs

CPS costs

74. Due to the absence of specific data on unit costs, costs to the CPS have not been estimated it is likely that these will increase given the volumes increase in offenders being prosecuted.

Victim services costs

75. It has not been possible to estimate the cost to victim services as a result of an increase in demand for victim support services. This is due to an absence of specific data on the number of child sexual abuse victims that access victim support services and the average length of time that this support is required for different types of child sexual abuse. It is likely that there will be an increase in costs as a result of an increase in volume of victims identified.

Training Costs

76. It is not possible at this time to quantify and monetise any potential training costs. It is currently estimated that there will be limited training costs associated with the introduction of the duty as it is not envisaged that the duty would add extra safeguarding burdens on regulated professions that work with children. Further evidence will be gathered with regards to any additional training requirement for the final IA.

Social Cost

77. There may be an indirect social and economic cost from an increase in children not reporting abuse for fear of potential consequences for them, for their families and potentially for their abuser. The duty may also deter families from seeking help.⁵⁶ If there is an increase this would result in an increase in wider economic and social costs associated with being a victim of child sexual abuse.^{57,58} It is not possible at this time to quantify or monetise this effect.

⁵³ The terms children in care and looked after children have been used interchangeably in this IA.

⁵⁴ HO0197 Consultation Impact Assessment (2015), 'Possible new requirements relating to reporting and acting on Child Abuse' can be found here: https://assets.publishing.service.gov.uk/media/5a817d9940f0b62305b8f3ba/Impact_Assessment_-_Consultation_Stage_web.pdf

⁵⁵ HMT (2023), GDP deflators at market prices, and money GDP June 2023 (Quarterly National Accounts). Available here: <https://www.gov.uk/government/statistics/gdp-deflators-at-market-prices-and-money-gdp-june-2023-quarterly-national-accounts>

⁵⁶ IICSA, The Report of the Independent Inquiry into Child Sexual Abuse. Available here: https://webarchive.nationalarchives.gov.uk/ukgwa/20221215051709/https://www.iicsa.org.uk/key-documents/31216/view/report-independent-inquiry-into-child-sexual-abuse-october-2022_0.pdf

⁵⁷ IICSA, The Report of the Independent inquiry into Child Sexual Abuse: Available here: https://webarchive.nationalarchives.gov.uk/ukgwa/20221215051709/https://www.iicsa.org.uk/key-documents/31216/view/report-independent-inquiry-into-child-sexual-abuse-october-2022_0.pdf

⁵⁸ Home Office (2021), The economic and social cost of contact child abuse. Available here: <https://www.gov.uk/government/publications/the-economic-and-social-cost-of-contact-child-sexual-abuse/the-economic-and-social-cost-of-contact-child-sexual-abuse>

Professional costs as a result of Professional bodies introducing sanctions.

78. It is not possible at this time to quantify or monetise the costs associated with the imposition of professional sanctions for individuals who fail to report direct disclosures of abuse. Breaches of the duty will be considered under a range of regulatory frameworks, which will be applied to determine appropriate disciplinary action based on the circumstances of the case. The costs could take the form of regulators developing new guidance and processes for reporting failures to disclose under the duty. It could also involve indirect costs associated with convening special boards and costs associated with Tribunals.

Introduction of a concealment offence for failure to report child sexual abuse

79. It is not possible at this time to monetise the costs associated with the introduction of a concealment offence. It is anticipated that there will be small number of prosecutions associated with this over the appraisal period. Further work to understand the impact of this will be undertaken for the final IA.

BENEFITS

80. Implementing the Duty will help safeguard children and deter offenders, and repeat offenders, by making it an offence not to act on direct disclosures. This will bring multiple benefits arising from safeguarding victims - benefiting victims, their families and society. These benefits will be economic and social and have been outlined briefly in paragraphs 85-88.
81. It has not been possible to monetise benefits related to the intervention, because of an absence of existing data or literature which can be used to estimate the expected crime reduction benefits from the duty. Instead, a break-even analysis and non-monetised benefits are presented to indicate how much child sexual abuse would need to reduce by to offset the cost of the intervention.
82. The break-even analysis uses the unit cost estimate from the Economic and Social Cost of Contact Child Sexual Abuse for contact child sexual abuse.⁵⁹ There is no equivalent cost estimate available for non-contact child sexual abuse. A large proportion of PRC child sexual abuse offences fall into the contact child sexual abuse category and thus the unit cost is used as a proxy to estimate the harm that child sexual abuse presents to society and the economy overall. The unit cost for contact child sexual abuse is estimated to be £89,200 at 2018/19 price year, when inflated to 2024/25 price year, the unit cost is £107,000.⁶⁰ It is uncertain whether this unit cost over or underestimates the true value of the social and economic harm caused by child sexual abuse.
83. To estimate the volume of child sexual abuse cases that would need to be prevented to offset the costs of intervention the unit cost of contact child sexual abuse and total costs identified have been discounted over a 10- year appraisal period. Between April 2022 and March 2023, approximately 102,000 child sexual abuse offences were reported to the police in England and Wales. It is estimated that between 200 and 1,100 child sexual abuse offences, with a central estimate of 625, would need to be prevented over a 10- year period to offset the cost of the intervention. Using the high estimate, that is less than 1 per cent of child sexual abuse crimes committed last year.

Non-Monetised Benefits

84. It is anticipated that there will be a range of benefits following intervention:
- **Reduction in offending** – An increased awareness of the duty may lead to an increase in reporting to the police from victims and others, and a reduction in perpetration as a result of a better understanding of the legal requirements around reporting. Fear of being reported to authorities may alter behaviour potentially leading to a reduction in offending.
 - **Prevent physical and emotional harm experienced by victims of child sexual abuse** – Victims of child sexual abuse experience considerable physical and emotional harm. Evidence

⁵⁹ Home Office (2021), The economic and social cost of contact child abuse. Available here: <https://www.gov.uk/government/publications/the-economic-and-social-cost-of-contact-child-sexual-abuse/the-economic-and-social-cost-of-contact-child-sexual-abuse>

⁶⁰ HMT (2023), GDP deflators at market prices, and money GDP June 2023 (Quarterly National Accounts). Available here: <https://www.gov.uk/government/statistics/gdp-deflators-at-market-prices-and-money-gdp-june-2023-quarterly-national-accounts>

shows that victims experiencing child sexual abuse are associated with a wide range of adverse physical and mental health outcomes including physical injuries, emotional distress, anxiety and depression.^{61, 62}

- **Increased feelings of reassurance in being believed** – There are multiple reasons why victims of child sexual abuse do not report abuse. Some victims of child sexual abuse do not report abuse due to concerns around being believed or concern that the information would not be acted on. Mandatory reporting will provide assurance that reports will be taken seriously, as those who fail to report will be penalised in the event that the duty is not acted upon.
- **Greater clarity around reporting** – The duty clarifies the reporting process ensuring that all professionals in scope are aware of who to report child sexual abuse offences to. This may help streamline the process of reporting.

Wider economic and social benefits

85. There are a range of wider social and economic benefits associated with preventing child sexual abuse. Some research suggests that victims of child sexual abuse are more likely to have contact with the police, both as offenders and for being a victim of crime, likely a result of externalising behaviour.⁶³ The CSEW shows that adults who report experiencing child sexual abuse are also more likely to report experiencing sexual assault and rape as adults.⁶⁴
86. There is evidence of child sexual abuse being associated with an overall reduction in educational attainment and increased unemployment alongside lower socioeconomic outcomes, for some victims.⁶⁵
87. Research by IICSA and Home Office Research into the economic and social cost of contact child sexual abuse⁶⁶ has shown that the impact of child sexual abuse can be long term and may sometimes result in illness and long terms disabilities.

NPSV, BNPV, EANDCB

Value for money (VfM)

88. Total costs are estimated to be between **£18.5 million and £101.1 million (PV)** with a central estimate of **£57.7 million (PV)** over a ten-year appraisal period. Total monetised benefits are estimated to be zero due to a lack of data which would enable benefits to be monetised. Breakeven analysis has been conducted as an alternative to NPSV for this reason and supplemented with a narrative discussion of benefits.
89. The NPSV is estimated to be between **-£18.5 million and -£101.1 million (PV)**, with a central estimate of **-£57.7 million (PV)** over a ten-year appraisal period.
90. The direct impact on businesses is estimated to range between **£1,100 and £158,000** with a central estimate of **£56,600**. A breakdown of costs is presented in Table 8 below.

⁶¹Fisher, et al (2017). The impacts of child sexual abuse: A rapid evince assessment, London Independent inquiry into Child Sexual Abuse.

⁶² The economic and social cost of contact child sexual abuse - GOV.UK, available here: <https://www.gov.uk/government/publications/the-economic-and-social-cost-of-contact-child-sexual-abuse/the-economic-and-social-cost-of-contact-child-sexual-abuse>

⁶³ Fisher, et al (2017). The impacts of child sexual abuse: A rapid evince assessment, London Independent inquiry into Child Sexual Abuse.

⁶⁴ ONS, (2020). Child sexual abuse in England and Wales - Office for National Statistics (ons.gov.uk)<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/childsexualabuseinenglandandwales/yearendingmarch2019>

⁶⁵ IICSA, The Report of the Independent inquiry into Child Sexual Abuse: Available here: https://webarchive.nationalarchives.gov.uk/ukgwa/20221215051709/https://www.iicsa.org.uk/key-documents/31216/view/report-independent-inquiry-into-child-sexual-abuse-october-2022_0.pdf

⁶⁶ The economic and social cost of contact child sexual abuse - GOV.UK, available here: <https://www.gov.uk/government/publications/the-economic-and-social-cost-of-contact-child-sexual-abuse/the-economic-and-social-cost-of-contact-child-sexual-abuse>

Table 8: Option 2 -Summary costs, benefit, NPSV and EANDCB £million (PV) 10 years 2024/25

Summary of costs and Benefits	Low	Central	High
Total set up costs	1.0	3.7	6.9
Private sector setup costs	0.0	0.06	0.16
Ongoing costs	17.5	54.0	94.2
Private sector ongoing costs	-	-	-
Public sector ongoing costs	17.5	54.0	94.2
Total Costs	18.5	57.7	101.1
Private sector benefits	-	-	-
Public sector benefits	-	-	-
Total benefits	-	-	-
Net Present Social Value	-18.5	-57.7	-101.1
Business Net Present Value	-0.0	-0.06	-0.16
Equivalent Annual Net Direct Cost to Business	0.0001	0.01	0.02

Source: Home Office internal estimates 2023

Option 3 costs and benefits

Monetised Costs

Familiarisation Cost

91. As noted in paragraph 42 there will be familiarisation costs associated with the implementation of the duty. The scale of familiarisation costs compared to option 2 will depend on the number of professions included within option 3 and associated wage costs. If a greater number of professions are included within option 3 with an associated increase in the number of staff, this cost may increase. Conversely, if the scope is significantly narrowed, with fewer professions included (compared to option 2) then this cost may be lower.
92. There is uncertainty around the volume of staff that will be affected by this option. To reflect this, a low, central and high range is estimated. In the low range it is assumed that there will be a 25 per cent reduction in the total volume of staff that the duty applies to in comparison to option 2. For the high range it is assumed that this option will result in 25 per cent more staff affected than in option 2. For the central range it is assumed that the same assumptions apply as in option 2. All other assumptions are the same as in option 2.
93. Familiarisation costs for option 3 are estimated to be **between £7,000 and £1.7 million** with a central estimate of **£479,000**.
94. For option 3 it is assumed that all other monetised costs will remain the same as option 2.

Non monetised costs

Training Costs

95. As noted in paragraph 77, it is not possible at this time to quantify and monetise any potential training costs. The scale of training costs compared to option 2 will depend on the number of professions included and the type of professions. It is currently estimated that there will be limited training costs associated with the introduction of option 3 as it is not envisaged that the duty would add extra safeguarding burdens on regulated professions that work with children. Further evidence will be gathered with regards to any additional training requirement for the final IA.

Benefits

96. It is anticipated that the benefits associated with option 3 will be similar to those noted in paragraphs 81 to 82. However, it is not possible at this time to quantify the scale of the benefits to make a comparison between option 2 and option 3. It is possible that a narrowing of the scope of professions included could result in a reduction in the non-monetised benefits from a reduction in opportunities to prevent offending (alongside the number of child sexual abuse cases prosecuted and prevented) and a narrowing of the scope of awareness raising opportunities. It is also possible that increasing the scope of professions could result in an increase in non-monetised benefits from increased opportunities for safeguarding and to prevent offending. The inclusion of protection for those who report may further encourage greater compliance with the duty and more awareness raising within those organisations being targeted by the duty. However, there is considerable uncertainty around this.

Value for Money

97. Based on the assumptions noted above it is estimated that Option 3 has a wider range of costs associated with it. These costs reflect the uncertainty in the number of workers that will have to familiarise themselves with new guidance/legislation issued.

98. Total Costs are estimated to range between **£18.5 million** and **£101.4 million** (PV) with a central estimate of **£57.7 million** (PV) over a 10-year appraisal period. Total monetised benefits are estimated to be zero due to a lack of data that would enable benefits to be monetised. As noted in Option 2, a breakeven analysis has been conducted as an alternative to NPSV and supplemented with a narrative discussion of benefits. The results of the breakeven analysis are similar to option 2. This is because the main difference in costs lie in familiarisation costs which represent a small proportion of the total costs.

Table 9: Option 3 - Summary costs, benefit, NPSV and EANDCB £million (PV) 10 years 2024/25

Summary of costs and Benefits	Low	Central	High
Total set up costs	1.0	3.7	7.3
Private sector setup costs	0.0	0.06	0.16
Ongoing costs	17.5	54.0	94.2
Private sector ongoing costs	-	-	-
Public sector ongoing costs	17.5	54.0	94.2
Total Costs	18.5	57.7	101.4
Private sector benefits	-	-	-
Public sector benefits	-	-	-
Total benefits	-	-	-
Net Present Social Value	-18.5	-57.7	-101.4
Business Net Present Value	-0.0	-0.06	-0.16
Equivalent Annual Net Direct Cost to Business	0.0001	0.01	0.02

Impact on small and micro-businesses

99. Across option 2 and option 3, there will be some impact on small and micro-businesses such as nurseries and childcare organisations. This impact will be in the form of familiarisation costs. It is anticipated that these costs will be negligible, one-off, costs for reading guidance/legislation and is in line with existing statutory expectations on organisations with functions relating to children. It is anticipated that exempting some Businesses and Organisations would undermine the duty. In

addition, there is limited evidence on direct reporting of child sexual abuse to staff in different size organisations, however there is a risk that excluding small and medium sized organisations could have an adverse impact on the non-monetised benefits noted in section E, particularly in terms of safeguarding children.

Proportionality

100. The analysis in this IA contains best estimates for the costs and benefits of the proposed policy. Every effort has been made to ensure that the analysis presents the best possible estimate of the likely impact of the options, given the time, resource and data available. These have been quantified where data is available, with risks highlighted in section G. This is a proportionate effort to appraise the policy.

F. Risks

101. There is limited evidence available on the effect of mandatory reporting in the UK, particularly with regards to increase in referrals to social services and the ensuing effect on CJS. The analysis presented here is based on a range of assumptions of varying quality. This uncertainty is reflected in the wide cost range. However, there is a risk that the analysis may under or overestimate costs associated with the introduction of the new offence.
102. There is a high risk that the estimated increase in reporting will under or overestimate the true effect. The analysis assumes that there will be an increase in reporting to the police due to increased publicity and an increase in precautionary reporting. But the increase will not be significant because a statutory duty already exists for adults working with children to report concerns about child sexual abuse. Therefore, it is assumed that increase in reporting to police will range between of 0.1 per cent and 0.5 per cent with a central estimate of 0.3 per cent. There is a high risk around this estimate.
103. It is assumed that there will be an increase in child sexual abuse referrals to social services and the number of children in care due to child sexual abuse. It is assumed that the increase will range from one per cent to three per cent with a central estimate of two per cent. There is no data to base this estimate on. This assumption may over or underestimate the true increase. To mitigate against this risk, these estimates have been included as indicative scenarios and not included in the NPSV calculations.
104. There is risk that the analysis does not cover the full range of professionals that will be impacted by the duty and may underestimate the true impact. A proportionate approach has been taken to capture the volume of individuals that will be impacted by this duty. But there is a risk that a small proportion of those impacted have not.

G. Direct costs and benefits to business calculations

105. For option 2 and option 3, it is estimated that there will be a cost to businesses and voluntary community bodies. It is assumed that the volume of staff working in the private sector remains the same across option 2 and 3. This cost will arise from the opportunity cost of reading guidance issued. This cost is outlined in more detail in paragraph 42. Estimates of the effect of the duty on the businesses and voluntary organisations here are based on currently available evidence of staff estimates. Where estimates were not available these costs have not been quantified. These estimates are presented in Table 10-12.
106. As noted in paragraph 42 familiarisation costs are estimated by multiplying the time it takes to read the legislation, with the estimated number of staff reading the legislation, which is then multiplied by the wage rate.
107. To estimate the wage rate, as noted in paragraph 42, the median hourly wage is used and uplifted to take into account non-wage benefits such as pension payments. It is estimated that on average non-wage costs for the private sector are 17 per cent.

108. As noted in paragraph 42 -45, to reflect uncertainty in the volumes of staff reading the guidance high central and low estimates are provided. These can be found in Table 10. Hourly wage per profession along with the proportion of hourly wage spent on reading the guidance can be found in Table 11. Table 12 provides total familiarisation cost by volume of staff working in the private sector for each profession. These estimates are based on the available data and do not cover all staff working in the private sector that may be affected. Therefore, it is likely that the figures provided underestimate the number of private sector staff affected. Further work will be undertaken to understand the impact on businesses and voluntary organisations for the final IA.
109. It is estimated that between 302,000 and 378,000 people will read the guidance with a central estimate of 340,000 staff.

Table 10: Low, central and high estimates of the volumes of private sector staff reading the guidance issued.

Staff working in the private sector	Low (80%)	Central (90%)	High (100%)
Teachers	47,700	53,600	59,600
Teaching Assistants	8,300	9,300	10,400
All group-based provisions/sessional/full day care setting	199,000	223,000	248,000
Total child Social Workers	5,600	6,300	7,000
Total Adult Social Workers	15,100	17,000	18,900
Childminding	27,100	30,500	33,900
Total volume of workers	302,000	340,000	378,000

Source: Home office internal estimates. Data used to calculate these estimates can be found in the annex.

Table 11: Low, central and high hourly wage and cost of reading guidance (£)

Staff working in the private sector	Total Hourly wage	Low cost of reading	Central cost of reading	High costs of reading
Teachers	30	0.01	0.30	0.80
Teaching Assistants	15	0.00	0.15	0.40
All group-based provisions/sessional/ full day care setting	10	0.00	0.15	0.30
Total child Social Workers	25	0.01	0.25	0.65
Total Adult Social Workers	25	0.00	0.25	0.65
Childminding	10	0.00	0.15	0.30

Source: Home Office internal estimates. Data used to calculate these estimates can be found in the footnotes.^{35 37 39}

Table 12: Low, central and high total familiarisation cost per profession affected (£)

Staff working in the private sector	Low (80%)	Central (90%)	High (100%)
Teachers	325	16,600	46,400
Teaching Assistants	30	1,500	4,200
All group-based provisions/sessional/full day care setting	560	28,500	79,500
Total child Social Workers	30	1,600	4,500
Total Adult social Workers	90	4,400	12,300
Childminding	80	3,900	10,900
Total	1,100	56,600	158,000

Source: Home Office internal estimates. Data used to calculate these estimates can be found in the annex and the footnotes ^{35 37 39}

110. It is estimated that total direct costs to businesses ranges between £1,100 and £158,000 with a central estimate of £56,600.

H. Wider impacts

111. As noted in paragraphs 81-88 there are a wide range of economic and social benefits associated with preventing child sexual abuse. Evidence shows that child sexual abuse is associated with an increased risk of adverse outcomes in many areas of a person's life, including physical, emotional and socioeconomic. Research by the IICSA has shown that the impact of child sexual abuse can be long term and may sometimes result in illness and disabilities.

I. Trade Impact

112. There is no expected trade impact as part of this intervention.

J. Monitoring and evaluation plan

113. Working in partnership with those responsible for keeping children safe, the government will undertake a review of the duty after a specified implementation period. This will evaluate the effectiveness of the new arrangements, including the impact the reporting duty has had on the identification of child sexual abuse and children and young people's outcomes more widely.

Impact Assessment Checklist

Mandatory specific impact test - Statutory Equalities Duties	Complete
<p>Statutory Equalities Duties</p> <p><i>Government departments must have due regard to the aims of the Public Sector Equality Duty. This duty sets out three aims: eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010; advance equality of opportunity between persons who share a protected characteristic and persons who do not share it, and; foster good relations between persons who share a protected characteristic and persons who do not share it. The Home Office will continue to consider equalities impacts in relation to the development of this policy. An equality statement will be published as part of a final impact assessment which takes into account the responses to this consultation.</i></p> <p>The SRO has agreed these summary findings.</p>	Yes

Economic Impact Tests

Does your policy option/proposal consider...?	Yes/No (page)
<p>Business Impact Target The Small Business, Enterprise and Employment Act 2015 (s. 21-23) creates a requirement to assess the economic impacts of qualifying regulatory provisions on the activities of business and civil society organisations. [Better Regulation Framework Manual] or [Check with the Home Office Better Regulation Unit]</p>	No
<p>Review clauses The Small Business, Enterprise and Employment Act 2015 (s. 28) creates a duty to include a review clause in secondary legislation containing regulations that impact business or civil society organisations. [Check with the Home Office Better Regulation Unit]</p>	No
<p>Small and Micro-business Assessment (SaMBA) The SaMBA is a Better Regulation requirement intended to ensure that all new regulatory proposals are designed and implemented so as to mitigate disproportionate burdens. The SaMBA must be applied to all domestic measures that regulate business and civil society organisations, unless they qualify for the fast track. [Better Regulation Framework Manual] or [Check with the Home Office Better Regulation Unit]</p>	Yes (21)
<p>Clarity of legislation Introducing new legislation provides an opportunity to improve the clarity of existing legislation. Legislation with multiple amendments should be consolidated, and redundant legislation removed, where it is proportionate to do so.</p>	No
<p>Primary Authority Any new Government legislation which is to be enforced by local authorities will need to demonstrate consideration for the inclusion of Primary Authority, and give a rationale for any exclusion, in order to obtain Cabinet Committee clearance. [Primary Authority: A Guide for Officials]</p>	No
<p>New Burdens Doctrine The new burdens doctrine is part of a suite of measures to ensure Council Tax payers do not face excessive increases. It requires all Whitehall departments to justify why new duties, powers, targets and other bureaucratic burdens should be placed on local authorities, as well as how much these policies and initiatives will cost and where the money will come from to pay for them. [New burdens doctrine: guidance for government departments]</p>	In progress

A New Burdens Assessment will be developed and signed off by Department for Levelling Up, Housing and Communities prior to the final IA being completed. Home Office analysts and policy will engage with relevant colleagues following the consultation to ensure relevant impacts have been fully assessed.

<p>Competition The Competition guidance provides an overview of when and how policymakers can consider the competition implications of their proposals, including understanding whether a detailed competition assessment is necessary. [Government In Markets Guidance]</p>	No
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Social Impact Tests

<p>New Criminal Offence Proposals Proposed new criminal offences will need to be agreed with the Ministry of Justice (MOJ) at an early stage. The Justice Impact Test (see below) should be completed for all such</p>	In progress
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proposals and agreement reached with MOJ before writing to Home Affairs Committee (HAC) for clearance. Please allow 3-4 weeks for your proposals to be considered.	
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<p>Justice Impact Test</p> <p>The justice impact test is a mandatory specific impact test, as part of the impact assessment process that considers the impact of government policy and legislative proposals on the justice system. [Justice Impact Test Guidance]</p>	In progress
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A Justice Impact Test will be developed and signed off by the Ministry of Justice prior to the final IA being completed. Home Office analysts and policy will engage with relevant colleagues following the consultation to ensure relevant impacts have been fully assessed.

<p>Privacy Impacts</p> <p>A Privacy Impact Assessment supports an assessment of the privacy risks to individuals in the collection, use and disclosure of information. [Privacy Impact Assessment Guidance] or [Contact the Corporate Security Information Assurance Team Helpline on 020 7035 4969]</p>	No
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<p>Family Test</p> <p>The objective of the test is to introduce a family perspective to the policy making process. It will ensure that policy makers recognise and make explicit the potential impacts on family relationships in the process of developing and agreeing new policy. [Family Test Guidance]</p>	No
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<p>Powers of Entry</p> <p>A Home Office-led gateway has been set up to consider proposals for new powers of entry, to prevent the creation of needless powers, reduce unnecessary intrusion into people’s homes and to minimise disruption to businesses. [Powers of Entry Guidance]</p>	No
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<p>Health Impact Assessment of Government Policy</p> <p>The Health Impact Assessment is a means of developing better, evidenced-based policy by careful consideration of the impact on the health of the population. [Health Impact Assessment Guidance]</p>	No
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Environmental Impact Tests

<p>Environmental Impacts</p> <p>The purpose of the environmental impact guidance is to provide guidance and supporting material to enable departments to understand and quantify, where possible in monetary terms, the wider environmental consequences of their proposals. [Environmental Impact Assessment Guidance]</p>	No
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<p>Sustainable Development Impacts</p> <p>Guidance for policy officials to enable government departments to identify key sustainable development impacts of their policy options. <i>This test includes the Environmental Impact test cited above.</i> [Sustainable Development Impact Test]</p>	No
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<p>Rural Proofing</p> <p>Guidance for policy officials to ensure that the needs of rural people, communities and businesses are properly considered. [Rural Proofing Guidance]</p>	No
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K. Annexes

Annex 1: Methodology note: profession volumes

1. A variety of data sources have been drawn upon to estimate the volume of the staff that will fall under the new duty. The professions identified fall into the following groups: Teaching professionals, medical professionals, childminders and other care providers, police and probation officers, children's home staff and social workers and housing officers. The data across these professions, where available, includes staff from both the public and private sectors.
2. To estimate the volume of teaching professionals in England, data from the Department of Education⁶⁷ was used. Where the data was available, headcount data has been used instead of full-time employment data to obtain a better understanding of the volume of teaching professionals. The data on private school staff has been obtained from the Independent Schools Council⁶⁸. To estimate the number of nursery staff it is assumed that for every five pupils there is one staff member, this is based on government guidance⁶⁹. Data on pupils by region was used to find the proportion of pupils in England. This was then used to calculate the number of nursery staff using the ratio between staff and pupils.
3. Data for childminders and other group-based providers including volunteers, has been obtained from the Department of Education.⁷⁰
4. The data on volumes of medical professionals was obtained from NHS Digital published data. Monthly data on full time employment for GPs⁷¹, nurses, midwives, health visitors⁷², ambulance workers⁷³ and paediatricians⁷³ has been used. Averages for the calendar year have been used to estimate the volumes of medical professionals.
5. Two sources have been used to obtain data in regard to children's homes. A workforce census of children's home from the Department of Education⁷⁴ and published data by OFSTED, the Office for Standards in Education, Children's Services and Skills⁷⁵ of the volume of children's home and places. These sources have been used to estimate profession volumes in this area, specifically, the volume of managers and non-managerial staff in children's homes. The data from the Department of Education provides the mean number of staff per home as well as the manager to staff ratio. Those values have been used in conjunction with the volume of children's homes provided by the OFSTED data to provide a range of estimates for the volume of staff and the volume of managers and non-managerial staff.
6. Employment data by occupation collected by the ONS⁷⁶ is used to estimate the number of housing officers. However, this data gives the volume of housing officers in the UK. To find the volume of

⁶⁷ Department for Education (2022), *School Workforce in England*. Available here: <https://explore-education-statistics.service.gov.uk/find-statistics/school-workforce-in-england>

⁶⁸ Independent Schools Council (2022), *ISC Census and Annual Report 2022*. Available here: https://www.isc.co.uk/media/8387/isc_census_2022_final.pdf

⁶⁹ Department for Education (2023), *Statutory framework for the early years foundation stage: setting the stage for standards for learning, development and care for children from birth to five*. Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1170108/EYFS_framework_from_September_2023.pdf

⁷⁰ Department for Education (2022), *Childcare and early years provider survey*. Available here: <https://explore-education-statistics.service.gov.uk/find-statistics/childcare-and-early-years-provider-survey/2022>

⁷¹ NHS Digital (2023), *General Practice Workforce, 31 December 2022*. Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/general-and-personal-medical-services/31-december-2022>

⁷² NHS Digital (2023), *NHS Workforce Statistics- April 2023 (including selected provisional statistics for May 2023)*. Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/nhs-workforce-statistics/april-2023>

⁷³ NHS Digital (2023), *NHS Workforce Statistics - April 2023 (Including selected provisional statistics for May 2023)*. Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/nhs-workforce-statistics/april-2023>

⁷⁴ Department for Education (2015), *A census of the children's homes workforce: research report: January 2015*. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/391529/RR437_-_Children_s_homes_workforce_census.pdf

⁷⁵ OFSTED (2023), *Children's social care data in England 2023*. Available at: <https://www.gov.uk/government/statistics/childrens-social-care-data-in-england-2023>

⁷⁶ ONS (2022), *Earnings and hours worked, occupation by four-digit SOC: ASHE Table 14*. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashtable14>

housing officers in England, population estimates from the ONS⁷⁷ have been used to estimate this proportion.

7. The number of adult social workers has been obtained from data published by NHS Digital⁷⁸ and total headcount data was used. It is assumed that there is no increase in volume of Social Workers due to uncertainty from Covid-19, this is why 2020 data is used for this profession [check]
8. Department of Education⁷⁹ provides data on the number of child and family social workers including agency workers who are employed by local authorities. Headcount data has been used to estimate these profession volumes.
9. Data on the total police force published by the Home Office⁸⁰, including volumes for the special constabulary and police support volunteers, has been used to estimate the volume of professionals falling under the duty. To estimate the proportion of total police workforce in England, UK population data⁷⁷, specifically population proportions have been used.
10. Data on HM Prison and Probation Services Workforce jointly published by the Ministry of Justice and HM Prison and Probation Service has been used to estimate volumes of probation officers in England and Wales and volumes of staff working in the day-to-day management of Youth Custody services.⁸¹ UK population proportions have been applied to obtain the volumes for England only.^{77,82}
11. Population estimates published by the ONS have been used to estimate the proportion of professionals in England where the data is provided nationally.⁷⁷

⁷⁷ ONS (2022). *Population estimates for the UK, England, Wales, Scotland and Northern Ireland: mid-2021*. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/latest>

⁷⁸ NHS Digital (2021). *Personal Social Services: Staff of Social Services Departments, England 2020*. Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/personal-social-services-staff-of-social-services-departments/england-2020>

⁷⁹ Department for Education (2023). *Children's social work workforce*. Available at: <https://explore-education-statistics.service.gov.uk/find-statistics/children-s-social-work-workforce>

⁸⁰ Home Office (2022). *Police workforce, England and Wales: 31 March 2021 second edition*. Available at: <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2021/police-workforce-england-and-wales-31-march-2021>

⁸¹ HM Prison and Probation Service and Ministry of Justice (2023). *HM Prison and Probation Service workforce quarterly: March 2023*. Available at: <https://www.gov.uk/government/statistics/hm-prison-and-probation-service-workforce-quarterly-march-2023>

⁸² The Youth Custody Service (YCS), created in April 2017 to oversee day-to-day management of the under 18s young people's estate, is a new specialist service.

Annex 2 – Child sexual abuse PRC codes used in modelling effects of intervention

1. Data on the number of police recorded crimes for child sexual abuse are based on the volumes of offences recorded against the offence codes below.

17B	Sexual assault on a male child under 13
19D	Rape of a female child under 16
19E	Rape of a female child under 13
19G	Rape of a male child under 16
19H	Rape of a male child under 13
20B	Sexual assault on a female child under 13
21	Sexual activity involving a child under 13
22B	Sexual activity involving child under 16
71	Abuse of children through sexual exploitation (formerly prostitution or pornography)
73	Abuse of position of trust of a sexual nature
88A	Sexual grooming
86	Obscene publications (proxy for indecent image of children offences)