

Economic Note	Number: HO EN 1043		
Title of regulatory proposal	NCA Barred and Advisory List		
Lead Department/Agency	Home Office		
Expected date of implementation	September 2026		
Origin	Domestic		
Date	February 2026		
Lead Departmental Contact	CrimeandPolicingBillTeam@homeoffice.gov.uk		
Departmental Assessment	GREEN		
Rationale for intervention, objectives and intended effects			
A 2023 inspection by HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) found that National Crime Agency (NCA) officers dismissed for misconduct, or under investigation, could still work elsewhere in law enforcement. This creates a public risk, as those dismissed (or who would have been dismissed had they not left) can return to policing roles. In January 2024, the National Police Chiefs’ Council (NPCC) ran an integrity screening project using the Police National Database, which highlighted legislative gaps preventing dismissed NCA and special police forces officers from being added to policing barred lists. As a result, the government plans to introduce barred and advisory lists for the NCA and the three national special police forces: the Civil Nuclear Constabulary, British Transport Police, and Ministry of Defence Police. This legislation aims to close vetting gaps and strengthen public trust in law enforcement.			
Policy options (including alternatives to regulation)			
Option 0: ‘Do nothing’.			
Option 1: Legislate to establish and maintain a barred list and an advisory list for the NCA and national special police forces. Option 1 is the government’s preferred option.			
Costs and benefit summary			
There are expected to be opportunity costs to forces from having to add and remove individuals from the lists, as well as training costs and costs to purchase system licences. The total 10 year cost is estimated to be £0.59 million. The main benefit is the non-monetised improved confidence in policing.			
Risks			
The main analytical risk of this policy is the risk of different forces having different labour costs. This is mitigated using upper and lower bounds.			
Total Cost (£m PV)	Transition Cost (£m Constant)	Cost to Business (£m PV)	
0.59	0.08	0.29	
Total Benefit (£m PV)	NPSV (£m PV)	BNPV (£m PV)	EANDCB (£m PV)
0.29	-0.30	-	-
Price Base Year	PV Base Year	Appraisal period (Years)	Transition period (Years)
2025/26	2026/27	10	1
Departmental sign-off (SCS):	Rod McLean, Head of the SOC System Unit, SRO		Date: 18/02/26
Chief Economist sign-off:	Tim Laken		Date: 12/05/26
Better Regulation Unit sign-off:	Emma Kirk		Date: 15/05/26

Evidence Base

A. Policy objectives and intended effects

1. To amend legislation and remove the loophole that officers dismissed (or would be dismissed if they had not left the service) by the National Crime Agency (NCA) and national special police forces for misconduct, allows them to seek future employment in other law enforcement agencies. This will increase trust and transparency in law enforcement and protect the public. Without respective barred lists, dismissed NCA and special police officers may be able to seek future employment in policing and law enforcement. The NCA and special police force advisory lists will act as interim lists which offers safeguarding measures to future employers where disciplinary proceedings are yet to be concluded.
2. Success will be measured through improvements to information sharing between respective police and law enforcement bodies to avoid unsuitable individuals from freely being able to move between relevant bodies.
3. Given recent examples of law enforcement officers committing serious criminal offences, such as Wayne Couzens¹ and David Carrick,² which have highlighted the risk to the public and the calls for improvements to conduct and integrity in law enforcement, this legislation would increase public trust. This legislation links to the government's mission to put confidence back into policing³.

B. Policy options considered, including alternatives to regulation

Option 0 – 'Do nothing'

4. Option 0 would entail no government intervention through changes to legislation.
5. Option 0 does not meet the government's objectives. The risk of officers dismissed from the NCA and special police forces for misconduct moving into wider law enforcement depends on the level of vetting checks carried out by a recruiting organisation which can be inconsistent across forces. This option ignores His Majesty's Inspectorate of Constabulary and Fire & Rescue Services' (HMICFRS) recommendation and the letter from the National Police Chiefs Council (NPCC) and the College of Policing (CoP) in which they express their support for the urgent need for legislation to create barred and advisory lists for the NCA.

Option 1 – legislate to establish and maintain a barred list and an advisory list for the NCA and national special police forces

6. The government would introduce provisions in primary legislation to establish a statutory framework for NCA and national special forces barred and advisory lists. This would place duties on the NCA to maintain the lists and on policing and law enforcement bodies to consult the lists when making employment decisions, based on the existing policing model, as set out in the Police and Crime Act 2017 (PCA 2017). The operation of the lists would be set out in Regulations (via statutory instrument), reflecting the approach taken for the policing barred list under the PCA 2017. **This is the government's preferred option.** This EN will also apply to the accompanying Regulations.

Non-regulatory options

7. As the intended change requires legislation to accomplish, it is not possible to achieve the government's desired outcome with a non-regulatory option.

¹ Sarah Everard: How Wayne Couzens planned her murder - BBC News: <https://www.bbc.co.uk/news/uk-58746108>

² David Carrick, ex-Met officer, given additional life sentence - BBC News: <https://www.bbc.co.uk/news/articles/cy0y075nyw8o>

³ Government's Safer Streets Mission: <https://www.gov.uk/missions/safer-streets>

C. Past evaluations and rationale for government intervention

8. An inspection into the NCA in 2023⁴ found that NCA officers dismissed for misconduct or under investigation for misconduct were not prevented from working elsewhere in law enforcement. The risk of officers dismissed from the NCA for misconduct moving into wider law enforcement depends on the level of vetting checks carried out by a recruiting organisation which can be inconsistent across forces. This finding led to HMICFRS recommending that the Home Office should work with the NCA and the CoP to amend the Police Barred List and Police Advisory List Regulations 2017 to include the NCA. The PCA 2017 and its corresponding Regulations cover England and Wales only. The NCA's remit is UK-wide, with officers in Scotland and Northern Ireland, meaning any barred list would also need to be UK-wide.
9. This meant that amendments to the PCA 2017 and Regulations would not be suitable, and instead primary legislation will be required. Additionally, in January 2024, the NPCC carried out a large integrity screening project to check staff against the police national database. The results raised concerns around the absence of a legislative framework which would enable dismissed NCA and special police forces officers to be added to policing lists. Furthermore, in May 2024, the NPCC and the CoP wrote to the NCA (and forces not covered by existing legislation), supporting the urgent need for legislation to create equivalent barred and advisory lists.
10. Currently, there is a risk that individuals who have been dismissed from the NCA are able to seek future employment in law enforcement, a loophole which this legislation seeks to close. Since 2022, 58 NCA officers (around 0.91% of the workforce)⁵ have been dismissed, or would have been dismissed had they not resigned. It is a risk to the public that those who have been dismissed for misconduct (or would be dismissed if they had not resigned) can make their way back into law enforcement.

D. Appraisal

General assumptions and data

11. The following general assumptions are used in this Economic Note (EN) in line with guidance set out in the HM Treasury Green Book⁶ and other measures within the Crime and Policing Bill:
 - Prices are reported in 2026/27 prices using the GDP Deflator⁷.
 - The Present Value year is 2026/27, and a discount rate of 3.5 per cent is used.
 - The appraisal period lasts 10 years from 2026/27 to 2035/36.
12. This EN includes the impact of the NCA, British Transport Police (BTP), Civil Nuclear Constabulary (CNC), and Ministry of Defence (MOD) Police creating and managing their own lists.

⁴ National Crime Agency inspection – Vetting and anti-corruption part 1: How effective is the National Crime Agency at dealing with corruption? (justiceinspectorates.gov.uk): <https://assets-hmicfrs.justiceinspectorates.gov.uk/uploads/national-crime-agency-inspection-vetting-and-anti-corruption-part-1.pdf>

⁵ Internal NCA Management Information

⁶ The Green Book (2022), GOV.UK, <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government/the-green-book-2020>

⁷ GDP deflators at market prices, and money GDP December 2025 (Quarterly National Accounts), GOV.UK, <https://www.gov.uk/government/statistics/gdp-deflators-at-market-prices-and-money-gdp-december-2025-quarterly-national-accounts>

Costs

Setup Costs

Cost 1: System Licence Setup Costs

13. To set up the lists, the forces/agencies covered in the legislation (NCA, Civil Nuclear Constabulary, British Transport Police, and Ministry of Defence Police) will be required to pay a setup fee to the CoP of £10,000 per force in Year 1 (2026/27).
14. The analysis assumes that this price reflects the full cost recovery of the third party hosting the licences. As a result, the private sector benefit from the licence fee revenue is equivalent to this cost but is cancelled out by the cost of setting up each licence.
15. Since four forces/agencies will require licences, the total setup cost will be £40,000 in 2026/27 (2026/27 Prices).

Cost 2: Training Costs

16. There is a setup cost associated with training officers in the NCA / BTP / CNC / MOD Police in how to use the relevant lists. This training will be conducted by a representative of the CoP.
17. Internal data from the Home Office is used to model the labour cost. The analysis assumes that relevant officers are the equivalent of constables, and CoP trainers are the equivalent of a sergeant. This provides an estimate of the labour cost of between £46.25 and £52.49 per hour, with a central estimate of £47.93 (for trainers) and between £35.04 and £41.29 per hour, with a central estimate of £36.73 (for trainees). Training is assumed to take one hour, and between 25 and 30 people, with a central estimate of 28 people, are estimated to require training in total.

Table 1: Cost of training officers to be able to manage lists (£, 2026/27 Prices, 2026/27 PV)

	Volume of trainers required	Trainer Labour Cost (£ / hour)	Volume of trainees required	Trainee Labour Cost (£ / hour)	Total (£)
Low	4	46.25	25	35.04	1,000
Central	4	47.93	28	36.73	1,200
High	4	52.49	30	41.29	1,400

Internal Home Office estimates, rounded to nearest £100.

18. The total cost of training is estimated to be between **£1,000 and £1,400, with a central estimate of £1,200 (2026/27 Prices, 2026/27 PV).**

Ongoing Costs

Cost 3: Managing Lists

19. There will be an opportunity cost from forces having to add and remove individuals from either the barred or advisory lists. The labour cost of a constable is used as a proxy for the labour cost of the officers responsible for managing these lists. Based on engagement with the affected forces, it is estimated that between **69 and 134 people, with a central estimate of 102 people**, will be added to the advisory and barred lists annually, and between **37 and 55 people, with a central estimate of 46 people**, will be removed from the lists each year, with the exception of Year 1. Since implementation is assumed to be September 2026, the annual figure is multiplied by 58 per cent to cover only the applicable months of 2026/27.
20. Individuals may be removed from the NCA Advisory List when the misconduct investigation that triggered their listing concludes without a finding that they would have been dismissed; the advisory list is intended as a temporary safeguard while matters remain unresolved. Where an investigation instead concludes that misconduct is proven and the individual would have been dismissed had they still been serving, they are not removed but are transferred from the

advisory list to the NCA Barred List. Removal from the NCA Barred List is only possible in limited circumstances set out in the regulations, including following a successful review or appeal, on application by the barred individual after the prescribed minimum period, or on death, with decisions taken by the Director General of the NCA.

21. The analysis assumes adding an individual to one of the lists will take 15 minutes and removing someone will take 10 minutes. This estimate is based on internal discussions with the NCA.
22. Combining the volumes with the time taken and labour cost leads to total ongoing costs of between **£6,700 and £14,400, with a central estimate of £9,900** (2026/27 Prices, 2026/27 PV).

Table 2: Cost of managing advisory and barred lists (£, 2026/27 Prices, 2026/27 PV)

	Time spent managing lists per year (hours)	Labour Cost (£ / hour)	Annual Cost (£)	10 Year PV Cost (£), 2025/26 Prices
Low	23.42	35.04	800	6,700
Central	33.04	36.73	1200	9,900
High	42.67	41.29	1800	14,400

Internal Home Office estimates, rounded to nearest £100.

Cost 4: System Licence Ongoing Costs

23. In addition to the initial setup, an ongoing fee is required to maintain the lists. This will be between £7,000 and £10,000 with a central estimate of £8,500 per force per year from Year 2 (2027/28) onwards. This is subject to change over time, so is forecast to increase with inflation for the purposes of the modelling. Licence costs are to be paid by each agency taking part in the lists, so is multiplied by four.
24. It is assumed that this price reflects the full cost recovery of the third party hosting the licences, as the cost is paid to the CoP who holds the contract. Further assumptions on the profits of the third-party host were not provided. As a result, the private sector benefit from the licence fee revenue is cancelled out by the cost of maintaining each licence.
25. The total ongoing cost is estimated to be between **£0.21 million and £0.30 million, with a central estimate of £0.25 million (2026/27 Prices, 2026/27 PV)**.

Non-monetised Costs

Cost 5: Checking Lists

26. Under the legislation, forces are required to check any new recruits against the advisory and barred lists. While forces will be expected to maintain their own separate lists, these will feed into one master list held privately by the CoP.
27. As these law enforcement agencies are already required to check against the police advisory and barred lists when recruiting, the government expects the additional time spent reviewing the new lists to be minimal.

Benefits

Benefit 1: Licence Fee Revenue

28. As mentioned in the costs section, the third-party supplier will receive licence fee revenue equal to the setup and ongoing costs incurred by the police forces.
29. It is assumed that this price reflects the full cost recovery of the third party hosting the licences as the NCA/forces will pay the CoP who holds the contract, and further profit assumptions for the third-party host were not provided. As a result, the private sector benefit from the licence fee revenue is cancelled out by the cost of setting up and maintaining each licence.
30. The total setup benefit of the licences is **£40,000 (2026/27 Prices, 2026/27 PV)**, and the ongoing benefit is estimated to be between **£0.21 million and £0.30 million, with a central estimate of £0.25 million (2026/27, 2026/27 PV)**. The total benefit, over the appraisal period,

is estimated to be between **£0.25 million and £0.34 million, with a central estimate of £0.29 million (2026/27, 2026/27 PV).**

Non-monetised Benefits

Benefit 2: Improved confidence in policing

31. As noted in Section C, an inspection into the NCA in 2023 found NCA officers who were dismissed for misconduct or under investigation for misconduct (or would have been dismissed if they had not left the service) were joining the police or moving to other forces/agencies. The creation of these lists will increase the transparency within the law enforcement disciplinary system and eliminate this loophole, which will reduce the risk from these individuals remaining in law enforcement. As a result, there should be an increase in the public's confidence of policing.

NPSV, BNPV and EANDCB

32. The government assumes the licence fee revenue that the third party will receive is equal to the full cost of supplying and maintaining the licences. The Business Net Present Value (BNPV) and Equivalent Annual Net Direct Cost to Businesses (EANDCB) are zero.
33. The Net Present Social Value (NPSV) is estimated to be between **-£0.26 million and -£0.35 million**, with a central estimate of **-£0.30 million (2026/27 Prices, 2026/27 PV).**

Table 3: Appraisal Summary (£, 2025/26 Prices, 2026/27 PV)

	Low	Central	High
Familiarisation Costs	1,100	1,200	1,400
Licence Fees - Public Sector Setup Cost	40,000	40,000	40,000
Licence Fees - Private Sector Setup Cost	40,000	40,000	40,000
TOTAL SETUP COSTS	81,100	81,200	81,400
Managing Lists	6,700	9,900	14,400
Licence Fees - Public Sector Ongoing Cost	208,800	256,000	298,300
Licence Fees - Private Sector Ongoing Cost	208,800	256,000	298,300
TOTAL ONGOING COSTS	424,400	517,100	611,000
TOTAL COSTS	505,400	598,300	692,500
Licence Fees - Private Sector Revenue	248,000	293,600	338,300
TOTAL BENEFITS	248,000	293,600	338,300
NPSV	-256,600	-304,700	-354,200
BNPV	-	-	-
EANDCB	-	-	-

Internal Home Office estimates, rounded to nearest £100

34. The NPSV for this measure is slightly negative. The benefit of improved public confidence in policing is expected to outweigh the small cost associated with the creation and maintenance of these lists.

E. Wider impacts

35. **Social:** The reduced risk of an individual remaining in law enforcement will likely result in fewer instances of misconduct of law enforcement officers in the future. This may positively affect relations between communities and police.
36. **Regional:** The biggest benefit will be likely felt in areas where the NCA / BTP / CNC / MOD Police operate, as individuals on the lists will not be able to join local territorial police forces.
37. The policy is not expected to have any other wider impacts.

F. Sensitivity

- 38. Although the policy involves procurement of an IT system from the private sector, any costs to businesses are fully recovered through the contract price. As such, the measure does not impose a net cost on business. The EANDCB is therefore assessed as zero, and the policy is out of scope of the definition of a Regulatory Provision.
- 39. This EN is being produced as part of the wider Crime and Policing Bill.

G. Risks

- 40. **Labour Costs:** The government assumes the labour cost across different law-enforcement bodies is comparable. A range of labour costs are used to mitigate this risk. The lower bound assumes all individuals are on the national pay scale, and the high bound assumes all individuals are on the London pay scale, with the central estimate being a mixture of the two.
- 41. **Checking Lists:** The government assumes that because organisations already check the police advisory and barred lists, the cost of checking the additional lists would be minimal. If the lists, however, differ in any way to the police list, this may require forces to spend more time checking the lists, increasing the costs. Given the scale of the other costs, however, it is likely any cost incurred to forces would not be large enough to affect the appraised value for money of the policy.

Annex

Mandatory specific impact test - Statutory Equalities Duties	Complete
An Equality Impact Assessment (EIA) has been completed for the overall package of measures set out in the Crime and Policing Bill. The objective of this measure is to bring the NCA and other special forces in line with existing processes in police forces in England and Wales. This will improve vetting procedures and increase integrity in law enforcement. No negative impacts in relation to protected characteristics have been identified. The SRO has agreed these summary findings.	Yes