Economic Note	Number: HO EN 1047
Title of regulatory proposal	Internal Concealment
Lead Department/Agency	Home Office
Expected date of implementation	1 October 2026
Origin	Domestic
Date	17/02/2026
Lead Departmental Contact	CrimeandPolicingBillTeam@homeoffice.gov.uk
Departmental Assessment	GREEN

Rationale for intervention, objectives and intended effects

Internal concealment (IC) refers to the practice whereby criminals conceal or cause the concealment of certain items (such as drugs, SIM cards, mobile phones and weapons) inside another person's body, often through compulsion, coercion, deception or through controlling or manipulative behaviour, for criminal purposes. Although some existing laws can be used to prosecute these cases, there is a legislative gap where victims are coerced but not trafficked, and the law does not currently recognise the specific and severe harm caused. Police also report evidential challenges when using current offences. Because there is no standalone offence, there is no reliable data on victims or offenders, limiting understanding of the scale of the problem. Introducing a specific IC offence, supported by statutory guidance, aims to provide a clearer, more comprehensive legal framework, improve consistency in the police response, raise awareness, increase deterrence, and ultimately increase prosecutions while reducing the exploitation of vulnerable people.

Policy options (including alternatives to regulation)

Option 0: 'Do nothing'. Police would continue to use existing legislation to deal with IC. This means a legislative gap would remain for adults who have been victims of IC but have not been transported.

Option 1: Introduce a new, standalone offence of IC, together with statutory guidance to recognise IC as a specific form of offending and fill the legislative gap. **This is the government's preferred option.**

Costs and benefit summary

Due to an absence of data, it is not possible to quantify additional costs or benefits. However, the majority of IC offenders are already likely to be charged for similar offences.

Risks

The main risk is the absence of any data on the prevalence of IC, meaning it has not been possible to quantify and monetise the impact of the new offence.

Total Cost (£m PV)	Transition Cost (£m Constant)	Cost to Business (£m PV)	
£0.2m	£0.2m	£0.0m	
Total Benefit (£m PV)	**NPSV (£m PV)**	**BNPV (£m PV)**	**EANDCB (£m PV)**
N/A	-£0.2m	£0.0m	£0.0m
Price Base Year	**PV Base Year**	**Appraisal period (Years)**	**Transition period (Years)**
2026/27	2026/27	10	5

Departmental sign-off (*SCS*):	Caroline Hart	Date: 13/02/2026
Chief Economist sign-off:	Tim Laken	Date: 23/03/2026
Better Regulation Unit sign-off:	Emma Kirk	Date: 24/03/2026

Evidence Base

A. Policy objectives and intended effects

1. IC (also known as "plugging") refers to the practice whereby criminals conceal or cause the concealment of certain items (such as drugs, SIM cards, mobile phones and weapons) inside another person's body, often through compulsion, coercion, deception or through controlling or manipulative behaviour, for criminal purposes[1]. IC is believed to happen most frequently in the context of carrying out criminal activities or avoiding detection such as County Lines drugs supply.[2]

2. There is existing legislation that can be used to prosecute IC such as offences under the Modern Slavery Act 2015 (MSA 2015)[3]. However, there is a legislative gap where a victim would be subjected to IC but not trafficked, meaning the MSA 2015 would not apply. Stakeholder engagement has identified evidential challenges that police claim they experience when applying for charges under existing legislation. The existing legislation also does not recognise the specific harm associated with IC which can have serious and long-lasting physical, psychological and emotional impacts on victims.

3. The absence of a specific offence also means that there is no data on numbers of victims or perpetrators of IC. This supports the need for a specific offence to increase awareness of IC as a specific issue, recognise the scale of harm caused to victims, and provide a strong deterrent for this behaviour, as well as increasing the numbers of prosecutions and convictions of offenders.

4. The purpose of this policy is to introduce a standalone offence for IC accompanied by statutory guidance.

B. Policy options considered, including alternatives to regulation

Option 0: Do-nothing

5. Under the 'Do nothing' approach, the Home Office would make no legislative change and (as now) depending on the facts of the case, IC cases are likely to fall under the existing legislative framework of modern slavery and human trafficking under the MSA 2015 and in some circumstances, be prosecutable under the Sexual Offences Act 2003[4] (section 2 assault by penetration and section 3 sexual assault), and sections 44 to 46 of the Serious Crime Act 2007[5] (inchoate offences).

6. Additionally, IC cases involving children will fall under the new offence of Child Criminal Exploitation (CCE) also being introduced under the Crime and Policing Bill[6]. However, a legislative gap would still exist for cases where an adult has been subjected to IC but

---

1 College of Policing IC definition (alcohol and drugs): https://www.college.police.uk/app/detention-and-custody/detainee-care/alcohol-and-drugs

2 NHS rapid read of IC: https://www.oscb.org.uk/wp-content/uploads/2021/12/nhs-Coercive-Internal-Concealment-Rapid-Read.pdf

3 Modern Slavery Act 2015: https://www.gov.uk/government/collections/modern-slavery-bill

4 Sexual Offences Act 2003: https://www.legislation.gov.uk/ukpga/2003/42/contents

5 Serious Crime Act 2007: https://www.legislation.gov.uk/ukpga/2007/27/contents

6 Crime and Policing Bill: https://assets.publishing.service.gov.uk/media/692eef9bce50d215cae96365/Crime_and_Policing_Bill_EN_1008__Violence_Against_Women_and_Girls_and_Protection_of_Children_and_Vulnerable_Adults_.pdf

not been forcibly transported. There would also be no associated increase in awareness of IC and subsequent improvement in the response to victims and perpetrators.

Option 1: Preferred option

7. The preferred option is to introduce a standalone offence to recognise IC as a specific form of criminality and fill the existing gap in legislation.

8. Introducing a specific standalone offence, together with statutory guidance, would increase prosecutions by increasing awareness and improving identification of victims and perpetrators.

Non-regulatory options

9. As IC is criminal activity which causes significant harm and requires a strong legislative response, no non-regulatory options were considered.

C. Past evaluations and rationale for government intervention

10. The economic and social rationale for government intervention is that depending on the facts of a particular case, while local police forces currently have the power to address IC using various existing offences and civil orders, such as under the MSA 2015, a bespoke framework would provide a more consistent and well evidenced response, and seek to mitigate the existing evidential challenges under current legislation. Notwithstanding the significant overlap with existing legislation, there is arguably a limited legislative gap, in particular for the internal concealment of adults for non-sexual purposes where there is no travel and/or the degree of labour does not amount to "forced labour."

11. Criminal groups exploit vulnerable individuals to conceal items for their own benefit. IC can be used for many different purposes, including transporting drugs and/or weapons as part of drug supply or gang-related activities, or transporting contraband into secure locations such as prisons. Individuals coerced into concealment are often caught up in other forms of abuse including violence and threats, emotional and sexual abuse, and debt bondage. The harm caused to victims can be particularly damaging including serious physical harm, long term trauma and entrapment in a cycle of criminalisation. This intervention will support the government's Safer Streets Mission[7] by reducing the harm to victims and enable law enforcement to more effectively pursue perpetrators for this activity and bring them to justice, by addressing a gap in legislation that is not fully captured by current offences.

D. Appraisal

General assumptions and data

12. The impacts of the preferred option (Option 1) are relative to the counterfactual 'Do-nothing' (Option 0) baseline. The appraisal period begins in 2025/26, and the policy is assumed to come into force in 2026/27.

13. There are no official statistics of IC cases recorded in England and Wales, so it is difficult to estimate the prevalence of IC and the number of additional cases for the new offence

[7] Safer Streets - GOV.UK: https://www.gov.uk/missions/safer-streets

each year. For example, the absence of a specific offence means there are no CJS data available, and the CPS have not charged anyone for IC offences under the MSA 2015.

14. However, it is assumed that the number of additional cases will be negligible, given the limited scope of the identified legislative gap. The primary impact of the intervention is therefore expected to arise from improved identification of offenders. It is assumed that the majority of offenders being charged for this offence will also be charged for an offence related to their wider criminal activities, such as Modern Slavery or drug and/or sexual offences. This will include the new CCE offence[8] that is being introduced in the Crime and Policing Bill, where the victim is a child and an adult has engaged in conduct towards or in respect of them, intending to cause them to engage in criminal conduct.

15. Where an individual will be charged and convicted of IC alongside the related offences identified above, it is assumed that these sentences will be served concurrently. This means there is no expectation of additional sentence lengths, as these other offences will have maximum sentences in line with, or greater than, the new IC offence. Given the limited additionality identified, there are no quantified additional costs to the CJS, and no estimated additional prison places required.

16. The assumption is that 96 per cent of IC offences would be committed for trial through the Crown Court, with the remaining 4 per cent through Magistrates' Courts[9]. Due to the absence of data on prosecutions for IC, this assumption is based on the proxy offences used for the CCE Impact Assessment (that is, modern slavery[10] and inchoate offences under the Serious Crime Act 2007[11]), given the similarities between the CCE offence and IC.[12]

Costs

Set-up costs: Familiarisation Costs

17. Individuals and organisations will be required to become familiar with the new legislation. The Secretary of State in practice, the Home Secretary will have a power to issue statutory guidance; if issued, there would be a duty on certain people to have due regard to such statutory guidance, such as the police and other applicant bodies. Legal professionals will also need to familiarise themselves with the legislation, and managers in support sector organisations working with vulnerable and exploited individuals may also read the legislation.

18. Total familiarisation costs associated with this legislative change are estimated to be between **£0.03 million and £0.4 million, with a central estimate of £0.2 million**.

Ongoing costs

19. Ongoing costs are considered to be negligible as perpetrators have been assumed to be charged for other related offences in all cases. All sentences have also been assumed to be served concurrently given the nature of related offences for example,

---

8 Crime and Policing Bill: https://assets.publishing.service.gov.uk/media/692eef9bce50d215cae96365/Crime_and_Policing_Bill_EN_1008__Violence_Against_Women_and_Girls_and_Protection_of_Children_and_Vulnerable_Adults_.pdf

9 CJS statistics June 2024: https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-june-2024

10 Modern Slavery Act 2015: https://www.legislation.gov.uk/ukpga/2015/30/contents

11 Serious Crime Act 2007: https://www.legislation.gov.uk/ukpga/2007/27/contents

12 Crime and Policing Bill: https://assets.publishing.service.gov.uk/media/692eef9bce50d215cae96365/Crime_and_Policing_Bill_EN_1008__Violence_Against_Women_and_Girls_and_Protection_of_Children_and_Vulnerable_Adults_.pdf

modern slavery/drug trafficking, so the estimated impact on the CJS is null and there are no quantifiable costs.

Benefits

Monetised benefits

20. No benefits were able to be monetised due to the absence of data on the prevalence of IC.

Non-monetised benefits

Social benefits

21. IC is a form of abuse which has harmful short-term and long-term effects on victims, on local communities, and on wider society. Any reduction in IC offending through deterrence or incarceration effects will likely have significant wider social benefits. However, there is insufficient evidence to quantify these benefits.

Data Quality

22. The current evidence base for IC is limited. To help address this, there is an ongoing data gathering exercise with police healthcare providers to understand whether, and how data on concealment are currently recorded. Given the operational role of healthcare providers, any data collected through this exercise will relate only to individuals in custody. This work is in preliminary stages; while it has helped to identify potential data sources and recording practices, it has not yet produced data of sufficient quality or coverage to inform any quantitative analysis for this assessment.

23. The creation of a specific offence of IC will lead to the collection of data on offences and CJS outcomes for IC. This will improve the limited evidence base that exists for IC and will lead to improved analysis in the future to better inform policy development.

24. The specific IC offence and statutory guidance will also allow for better identification and monitoring of IC offenders. This allows police to better identify perpetrators reducing the risk of them carrying out similar offences in the future.

Legislative gap

25. Currently there is a legislative gap for those have been subjected to IC but not been transported. The new offence would fill this gap which may allow some offenders to avoid justice with this gap in legislation.

NPSV, BNPV and EANDCB

26. NPSV has not been calculated as this EN does not include any monetised costs and benefits.

E. Wider impacts

27. The new IC offence is not expected to have a business impact, there will be no material impact on smaller businesses, trade, or investment within the UK.

28. Similarly, there are no anticipated impacts on the environment or on wealth distribution as a result of this policy.

29. There may be varying impacts for different geographical areas of England and Wales. County Lines gangs are known to predominantly operate from London, Birmingham, Liverpool, and Manchester, meaning these areas may see higher levels of exploitation

and related higher prevalence of IC. It is also likely that areas with high prison populations may be more affected, given the tactic of using IC to smuggle contraband into prisons. However, IC is present across the country and will not be limited to these areas.

F. Sensitivity

30. The equivalent annual net direct costs to the public sector are less than +/- £20 million over the appraisal period, so an IA is not required and no direct costs on business have been identified.

G. Risks

Analytical risk 1: data quality

31. There are no data available on the prevalence of IC and number of offenders, leading to uncertainty in the estimated impacts.

32. However, our analysis does not require the number of potential IC offenders as we have assumed that all offenders will be charged with similar offences, and all sentences will be served concurrently which would mean impact on the CJS will be negligible.

Analytical risk 2: unmonetised costs and benefits

33. The absence of data on the prevalence of IC prevented analysts from monetising potential benefits that may arise from a reduction in IC offending due to this policy. The extent to which the policy may reduce prevalence is also unknown and unsupported by evidence.

Policy risk 1: uncertainty around the implementation data

34. As this policy is part of the wider Crime and Policing Bill, dates for Royal Assent and implementation are uncertain and subject to wider considerations. The analysis assumes that the policy will come into force in FY 2026/27.

H. Annex

Mandatory specific impact test - Statutory Equalities Duties	Complete
The public sector equality duty requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations in the course of developing policies and delivering services. The primary objective of the proposals is to reduce the prevalence of coerced internal concealment thereby reducing the harm caused by this practice. The new offence would have a direct impact in relation to age. Victims of IC aged under 18 years may be more advantaged by this policy than those aged over 18 years old because the prosecution will only need to prove that a child has been intentionally caused to internally conceal, whereas proof of compulsion, coercion, deception, control or manipulation is required where the victim is an adult. The government considers that this is a proportionate means of achieving the legitimate aim of protecting children aged under 18 years old from coerced internal concealment given their particular vulnerability. Overall, the government considers that the benefits of the measure outweigh any potential risks. People with all protected characteristics may be affected by coerced internal concealment, so improving the response to victims of coerced internal concealment will have a positive impact on all communities, demographics, and protected characteristics. **The SRO has agreed these findings.**	**Yes**