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Adult Protection Bill: Review of Bill Costs

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This Review of Bill Costs considers the key potential financial implications for the public purse if the Adult Protection Bill is enacted as introduced to the Northern Ireland Assembly. It should be read alongside RalSe Bill Paper NIAR 209-2025, which addresses the Bill's key policy implications.

This information is provided to Members of the Legislative Assembly (MLAs) in support of their duties, and is not intended to address the specific circumstances of any particular individual. It should not be relied upon as professional legal advice, or as a substitute for it.

Key points

- The Adult Protection Bill marks a major step in strengthening Northern Ireland's approach to safeguarding adults at risk of harm. It aligns Northern Ireland with the rest of the United Kingdom by introducing statutory duties, coordinated governance, and formal oversight structures. This paper focuses on the financial implications of the Bill, assessing cost estimates, underlying assumptions, and lessons from comparable legislation elsewhere.
- The Department of Health's Explanatory and Financial Memorandum (EFM) projects £12 million in new expenditure (in year 1) and £120.8 million over ten years. This excludes the existing annual £17.1 million for Adult Safeguarding Gateway Teams. Around 80% of these costs arise from three key areas:
 - The duty to inquire and investigate (Clauses 3-9)
 - Training and workforce development (Clauses 3-16)
 - Legal aid provision linked to protection orders (Clause 21)
- The current Adult Safeguarding Gateway Teams provide a structural base for new functions under the Bill. Some overlap between existing and new duties may require integration to avoid duplication across Trusts.
- The Department's model is based on central cost assumptions covering staffing, structure, and activity volumes. Key uncertainties include the scale of inquiries, interpretation of "adult at risk," and the behavioural effects of implementation. A more detailed business case will follow as the Bill progresses. In the meantime, exploring areas of uncertainty, such as likely growth in demand for inquiries and workforce needs, through early sensitivity analysis would help produce feasible cost ranges, rather than relying on single cost estimates.
- Approximately 135 new posts are proposed across Trusts, introducing new senior roles. This supports oversight but may add cost pressure and affect recruitment at middle bands. Experience elsewhere suggests that workforce composition, recruitment timelines, and agency reliance are key factors shaping early implementation costs.

- The preferred service provision option (Option 5a) enables the Bill to pass while delaying full rollout until funding is secured. Phased recruitment and training are expected to moderate early costs and manage capacity pressures. Experience from other jurisdictions indicates that safeguarding referrals often rise sharply after new duties take effect.
- Several operational and financial details, such as the remit of the Adult Protection Board, inquiry thresholds, and CCTV standards, will be determined through future regulations. These carry potential ongoing cost implications depending on final scope and compliance standards. Publishing indicative budgets associated with these could support transparency and financial planning.
- Evidence from England, Scotland, and Wales shows that early-stage cost overruns in safeguarding reforms often stem from underestimated behavioural change, sustained growth in referrals, and multi-agency coordination costs. The Scottish experience highlights the need to plan for sustained demand and wide-scale training during the first implementation phase. The Department's costings indicate that training requirements, including multi-agency coordination, have been considered in detail.
- While the Bill's financial framework provides a foundation for phased delivery, challenges remain, particularly around inquiry demand, workforce capacity, and the impact of secondary legislation. A post-implementation review within 12 to 18 months of commencement could compare actual volumes and costs with projections, informing future funding and legislative adjustments. Ongoing modelling, monitoring, and transparent reporting will be essential to keep implementation both effective and affordable

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1 Introduction and Context

The Adult Protection Bill represents a significant shift in Northern Ireland's approach to safeguarding adults at risk of harm. Introduced to the Assembly on 17 June 2025 by the Minister of Health, Mike Nesbitt,¹ the Bill addresses long-standing gaps in adult protection exposed by inquiries into Muckamore Abbey Hospital and Dunmurry Manor.^{2,3} These cases underscored the need for a clear statutory framework to strengthen consistency, accountability, and coordination across the system, moving beyond reliance on discretionary practice and fragmented oversight.

The Bill brings Northern Ireland into closer alignment with England, Scotland, and Wales, where adult safeguarding has been supported by legislation.^{4, 5, 6} This convergence reflects a shared understanding that effective adult protection depends on clear legal duties, robust governance, and enforceable safeguards.⁷ While legislative reform is still progressing in the Republic of Ireland,⁸ Northern Ireland's Bill signals a commitment to statutory clarity and parity within the wider UK safeguarding landscape.

This briefing paper focuses exclusively on the financial scrutiny of the Bill. It does not examine broader policy, operational, or governance matters, which are addressed separately in NIAR 209-2025. The analysis draws primarily on the Bill,⁹ its Explanatory and Financial Memorandum (EFM),¹⁰ and supporting documentation provided by the Department of Health.¹¹

¹ [Health Minister introduces Adult Protection Bill to Assembly | The Northern Ireland Executive](#)

² [Muckamore Abbey Hospital Inquiry](#)

³ [Home Truths: A report on the Commissioner's Investigation into Dunmurry Manor Care Home](#)

⁴ [Care Act 2014](#)

⁵ [Adult Support and Protection \(Scotland\) Act 2007](#)

⁶ [A Regulatory Framework for Adult Safeguarding](#)

⁷ [Statement of Government Policy on Adult Safeguarding](#)

⁸ [The Law Reform Commission Publishes Report on A Regulatory Framework for Adult Safeguarding](#)

⁹ [Adult Protection Bill - Bill as Introduced](#)

¹⁰ [Adult Protection Bill - EFM As Introduced](#)

¹¹ Communication from the Department of Health 08/10/2025

2 Financial Scrutiny Framework: Principles and Approach

Financial scrutiny of legislation is a systematic process to assess the robustness, accuracy, and completeness of the government's cost estimates. It ensures that proposed legislation is financially viable and that resource implications are fully understood before enactment.¹² The process typically involves: deconstructing the Bill to identify cost-generating duties; exploring the assumptions upon which estimates/forecasts are based; and rigorously testing those assumptions for uncertainty. This approach reflects best practice as outlined in the HM Treasury's Green Book (2022)¹³ and the Northern Ireland Assembly Public Finance Scrutiny Unit (PFSU).¹⁴

2.1 Mapping Bill Clauses to Financial Implications

At a glance...

- **Main cost drivers:** Staffing for inquiries and investigations, workforce training, legal processes (including protection orders and legal aid), and governance structures such as the Adult Protection Board (Clause 30).
- **Additional provisions:** Include advocacy roles, CCTV regulation in care settings, and new criminal offences for ill-treatment and neglect, each adding operational and enforcement costs.
- **Uncertainty and phasing:** The EFM notes that full implementation will not be undertaken until funding is secured, with a dedicated business case and staged recruitment.

¹² [Financial scrutiny in Parliament - House of Commons Library](#)

¹³ [GOV.UK Guidance The Green Book \(2022\)](#)

¹⁴ [Public Finance Scrutiny Unit Workshop Series](#)

The Bill's 51 clauses establish a statutory framework for safeguarding adults at risk of harm, with significant costs arising from the transition to a formalised system. The estimated implementation cost is £12 million in the first year, rising to £120.8 million over 10 years, primarily driven by staffing, training, legal processes, and governance structures.

Central to the Bill are Clauses 30-39, which mandate the creation of an Adult Protection Board for Northern Ireland; this links to costs for staffing, administration, and annual reporting under Clause 34, plus serious case reviews.

Clauses 3-9 introduce a statutory duty to inquire and investigate, supported by powers of entry (Clause 5), private interviews (Clause 6), medical examinations (Clause 7), and access to records (Clause 8); these drive expenses for assessments, legal advice, and follow-up.

Clauses 10-16 establish protection orders, assessment, removal, and banning, tied to legal aid under Clause 21, with annual referrals requiring casework and potential court intervention. Clauses 17-20 and 22-29 further support these orders and advocacy roles (Clause 26), adding to operational costs.

Further costs stem from mandatory training (for Trust staff, PSNI etc) linked to Clauses 3-9 and 10-16, covering risk identification, ethical decision-making, and legal duties via regional programmes and e-learning.

Clauses 38-42 create new offences for ill-treatment or wilful neglect, increasing justice system demands. Clauses 43-47 regulate CCTV in specific care settings, enforced by RQIA, introducing compliance and oversight costs.

The Bill's EFM¹⁵ acknowledges uncertainty around affordability, noting delayed implementation until funding is secured, with phased recruitment and a dedicated business case for detailed assessment.

¹⁵ [Adult Protection Bill - EFM As Introduced](#)

2.2 Understanding Cost Estimates: Key Assumptions, Risks and Uncertainties

At a glance...

- **Structural choices:** Costs depend on how the system is organised, for example, whether inquiries are managed within each Trust or through regional hubs, and how “adults at risk” are defined and identified.
- **Unit costs:** The estimates are based on assumptions about the salary bands at which staff are appointed, the staffing mix, advocacy uptake, and training delivery methods, all of which may change over time.
- **Behavioural effects:** Experience from other jurisdictions shows that inquiries often rise after new laws take effect. Awareness, reporting, and multi-agency coordination can all drive higher than expected early-year costs.
- **Distributional impacts:** Rural areas may face higher staffing and travel costs, while carers and service users could bear hidden burdens.
- **Uncertainty and bias:** Without formal sensitivity and scenario analysis, the Department’s model risks underestimating costs if demand, inflation, or workforce pressures rise faster than planned. The Green Book (2022) recommends modelling best-, central-, and worst-case ranges to demonstrate financial variability.
- **Accountability:** Clear responsibility between Trusts and the Department, along with ongoing monitoring and evaluation, will play a key role in refining assumptions and helping to manage costs over time.

Several key assumptions underpin the Department's cost model. Some are structural, such as whether inquiries will be managed within each Trust or through regional hubs, how the term "adult at risk" will be interpreted in practice (Clauses 1-2), and how staff training will be delivered. Others are unit-based, including the salary levels used for new social-work posts (for example, specialist adult protection social workers with powers to access financial records under Clause 8) and the hourly rates assumed for independent advocates (Clause 26).

The model distinguishes between recurring costs, which continue year after year, such as staffing costs, and one-off or set-up costs, such as CCTV installation (Clauses 43–47) or IT upgrades for reporting and data sharing.

Costs are also affected by timing and behaviour. Experience elsewhere shows that inquiries often rise sharply after new legislation and training are introduced, as awareness increases. Over time, volumes may stabilise, but the initial surge can drive higher early-year spending. Some relationships work in opposite directions, for example, comprehensive training may reduce unnecessary referrals.

Every decision carries trade-offs, with funding spent on advocacy or assessments not being available to use elsewhere. The financial model should also consider how costs may fall unevenly, such as higher travel and staffing costs in rural areas, or hidden expenses for carers and service users.

Given the complexity of these estimates, it may be worthwhile examining the potential influence of uncertainty and optimism bias, i.e. the tendency to underestimate costs or overestimate benefits due to overly positive expectations. If demand grows faster than expected, or if inflation or workforce shortages increase costs, the total budget could rise well above forecasts. To manage this, the Department could carry out sensitivity and scenario analysis, techniques used to explore how changes in key assumptions, such as how a change in inquiry volumes, might affect overall costs. This provides a cost range rather than a single figure.

Finally, it may be useful to test the model against relevant UK comparators, apply standard discount rates over the ten-year horizon, and clarify funding responsibilities, for instance, the division between Trusts and the Department. Ongoing monitoring and evaluation could help track activity and spending, allowing assumptions to be refined as further evidence becomes available.

3 Financial Scrutiny of the Adult Protection Bill as Introduced

At a glance...

First-year cost: approximately £12 million

Estimated total cost: £120.8 million over 10 years

Existing related spend: £17.1 million annually for Adult Safeguarding Gateway Teams

Main cost drivers:

- Duty to inquire and investigate (Clauses 3-9)
- Workforce training and development (Clauses 3-16)
- Legal aid linked to protection orders (Clause 21)

Moderate and smaller one-off costs: Adult Protection Board, CCTV oversight, and advocacy roles, IT, accommodation, and systems setup.

Key risks: Early demand inquiry surges, workforce capacity, and costs emerging from secondary legislation/statutory guidance.

Key takeaway: Around 80 per cent of total new expenditure is concentrated in three areas, inquiries, training, and legal aid. This concentration underscores the importance of conducting sensitivity analyses and implementing robust workforce planning to ensure the long-term affordability and sustainability of adult protection services.

The following section applies the financial scrutiny framework set out above to the Department of Health's cost estimates for the Adult Protection Bill.

The EFM projects additional costs of around £12 million in the first year, rising to £120.8 million over ten years. Most of this funding relates to staffing, training, legal processes, and the operation of new structures such as the Adult Protection Board, along with supporting systems for IT and accommodation.

The Department modelled a range of implementation options, from "do nothing" (Option 1) to full delivery (Option 5) (Table 1). The Department of Finance has conditionally approved the preferred option (Option 5a) which allows the legislation to proceed but delays full rollout until funding is secured. Financial scrutiny therefore focuses on this option.

Initial costs will be lower due to phased recruitment, with a follow-up business case planned to refine timelines and affordability. Evidence to the Committee indicates that some elements, such as inquiries, will be less resource-intensive than others, such as complex investigations. This variation will affect how quickly capacity can be built and how training is sequenced.

The analysis that follows focuses on the main cost drivers, which together account for over 80% of the projected budget:

- the duty to inquire and investigate (Clauses 3-9)
- training and workforce development (Clauses 3-16)
- legal aid linked to protection orders (Clause 21)

Existing spending, such as the £17.1 million already allocated to Adult Safeguarding Gateway Teams, is noted but not examined in detail, as the focus here is on new costs directly resulting from the Bill. The Committee may nonetheless wish to explore potential overlaps or duplication between existing and new functions.

In the following section, each cost category is reviewed in turn, highlighting the underlying assumptions, timing of expenditure, and key financial risks. This structure aims to give Members a clear understanding of how the Bill's financial framework aligns with its legislative intent and how those costs may evolve over time.

Table 1: Cost-generating events and financial implications of EFM options

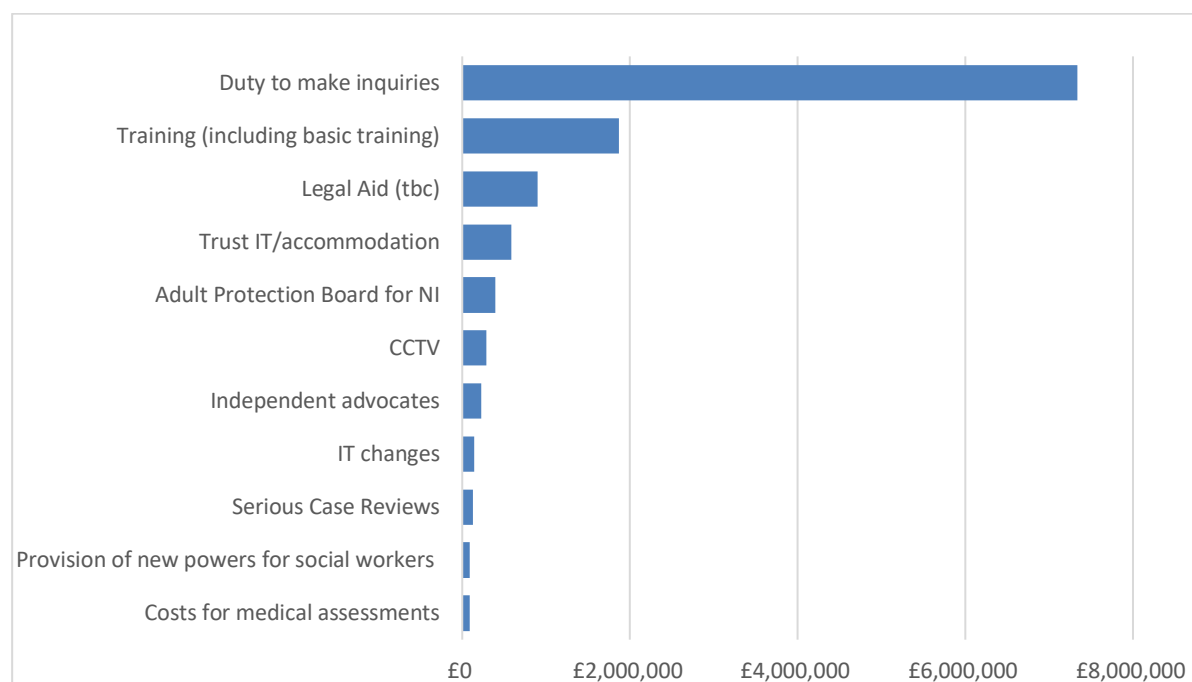
Option 1: 'Do nothing' (business as usual)	Limited additional funding Continued funding of Adult Safeguarding Gateway Protection Teams currently in operation in Health and Social Care (HSC) trusts.
Option 2: Minimum approach	Negligible increase in recurrent funding A Review of the Adult Safeguarding policy with some additional non-recurrent funding for regional training.
Option 3: Adult Protection Bill (inclusive of 'core' key service requirements)	Funding required for 'core' service requirements only • Introduction of Adult Protection Legislation for Northern Ireland • Introduction of a new duty to make inquiries upon the HSC Trusts • Introduction of a new duty to report and cooperate in inquiries • Creation of an independent Adult Protection Board to replace the existing interim board • Introduce Serious Care Reviews (SCRs) to adult safeguarding in Northern Ireland • Training for the Social Care sector on how to implement the new duties and responsibilities
Option 4: Adult Protection Bill (inclusive of 'core' and 'desirable' key service requirements)	Funding required for 'core' and 'desirable' service requirements. All 'core' service requirements listed above, plus • Introduction of a power of entry and associated protection orders • Introduction of a power to assess financial records • New cadre of Adult Protection workers to be given responsibilities for new powers • Introduction of new offences under the Bill, namely the offences of 'ill treatment', 'wilful neglect' and 'obstructing a social working seeking to apply a Power of Entry
Option 5: Adult Protection Bill (inclusive of 'core', 'desirable' and 'optional' key service requirements)	Funding required for 'core', 'desirable' and 'optional' service requirements. All 'core' and 'desirable' service requirements listed above, plus • Increased numbers of Independent advocates. • Installation and regulation of CCTV systems in care settings Option 5a: Introduction of Adult Protection Bill (as per Option 5) but delay commencement until funding is available

Source: Department of Health (received 08/10/2025)

Table 2: Estimated costs of implementation

Adult Protection Bill Estimated Costs of Implementation	Year 1 (2024-25)	Over 10 years
Adult Protection Gateway Funding	£17,167,914	£171, 679,136
Duty to make inquiries	£7,335,040	£86,284,866
Training (including basic training)	£1,869,707	£8,795,514
Legal Aid	£897,980	£10,294,336
Trust IT/accommodation	£586,209	£1,377,111
Adult Protection Board for NI	£396,296	£4,622,809
CCTV	£287,510	£3,267,310
Independent advocates	£224,000	£2,628,446
IT changes	£141,000	£141,000
Serious Case Reviews	£125,410	£1,451,170
Provision of new powers for social workers (financial records, offences)	£90,674	£948,512
Costs for medical assessments	£90,000	£1,031,749
Total Cost (including existing funding)	£29,222,739	£292,521,959
Total Cost (excluding existing Gateway funding) i.e. additional funding	£12,054,826	£120,842,823

Source: Department of Health Business Case and Costings (received 08/10/2025)

Figure 1: Key cost-generating events (year 1) - Adult Protection Bill

Source: Department of Health Business Case and Costings (received 08/10/2025)

3.1 Adult Protection Gateway Funding

At a glance...

£17.2 million is already spent annually on Trust safeguarding teams; new duties may overlap with this funding unless roles are clearly defined and/or integrated.

Table 3: Adult Protection Gateway Funding by Trust

HSC Trusts	Total Current Cost 2024/25
Belfast	£6,680,621
Northern	£2,519,218
Southern	£2,686,985
South Eastern	£2,443,634
Western	£2,837,455
Total	£17,167,914

Table 3 details current spend by Trusts on activities relating to adult protection and safeguarding. An areas for consideration is the potential overlap with new duties under Clauses 3-9, risking duplication without integration. For example, some staff currently dedicate 100 per cent of their time to adult protection work, while others allocate only 20 or 25 per cent, depending on their staff category. Consideration will be needed as to how this existing activity aligns with the new roles created to discharge statutory duties.

3.2 Duty to make inquiries

At a glance...

The Bill's single largest cost is around £7.3 million in year 1, with uncertainty over future demand, workforce feasibility, and staffing model employed.

This is the Bill's largest demand-led cost: around £7.3 million in year 1 and £86.3 million over 10 years, driven mainly by additional staffing for inquiries, investigations and governance. The business case proposes 135 new posts across all Trusts, including several senior roles (Bands 8A to 8C) alongside Bands 3 to 7 for practice, investigation and administration. While the aim is stronger oversight, the proposed staffing structure could risk pulling experienced practitioners out of frontline roles, creating vacancies and pressure at middle Bands. Evidence indicates that the organisational model adopted for adult protection services, whether safeguarding responsibilities are embedded within general social work teams or allocated to dedicated specialist teams, can have a significant impact on service efficiency, cost-effectiveness, and workforce sustainability. Each approach yields different outcomes in relation to service quality, staff capacity, and long-term operational viability.¹⁶

A second pressure is uncertain demand. The EFM does not set out an evidence-based trajectory for inquiry volumes. Experience from Scotland indicates sustained growth for several years as awareness rises. If volumes, or multi-agency inputs exceed initial assumptions used in the model, backlogs and reliance on agency staff become more likely.

The Green Book (2022) suggests using tools like sensitivity analysis and scenario testing to help deal with uncertainty when planning policies, especially for complex social programmes where results can be affected by things like changes in demand or rising costs (for example, wages in social care).

¹⁶ [Models of Adult Safeguarding in England: Findings from a Study of Costs and Referral Outcomes | The British Journal of Social Work | Oxford Academic](#)

While it's useful to have a clear estimate of costs, and Option 5a (waiting to implement until funding is secured) offers some protection, it's still important to undertake analysis of uncertainty at an early stage. This is recommended as unexpected changes, such as more people reporting issues due to new responsibilities, or wider economic issues affecting care providers, could lead to much higher costs than originally expected.

Without modelling these, the business case risks underestimating variability, potentially leading to funding shortfalls or less efficient allocation of funds.

Workforce feasibility remains an important area of uncertainty. Staffing costs, estimated at around £7.3 million, form the largest element of expenditure, and further detail on recruitment timelines, vacancy rates, and potential reliance on agency cover would help clarify overall delivery. Incremental recruitment appears reasonable in principle, but it would be prudent to assess it against actual service needs and ensure safeguards are in place to prevent disruption to core social work teams.

Potential scrutiny points:

The Committee may wish to explore whether the Department intends to reflect uncertainty explicitly within its cost model. HM Treasury's Green Book (2022) recommends using cost ranges or probability estimates to reflect possible variation. Without these, there is a greater risk that funding could fall short or be used inefficiently.

The Committee may wish to ask whether the Department has explored alternative delivery models, for example, regional inquiry hubs, shared senior oversight, or rotation of specialist staff, before adopting the current staffing structure. A high concentration of senior posts could draw experienced practitioners out of frontline roles, adding indirect pressure to existing services.

The Committee may wish to seek clarity on how workforce feasibility has been explored, including vacancy rate assumptions, recruitment timelines, and the use of agency cover. Incremental recruitment could be aligned with service demand and supported by a contingency plan to prevent destabilising core social work capacity.

The Committee may wish to request early monitoring of inquiry volumes, timeliness, and staffing during year 1, to help identify cost pressures promptly and support efforts to contain expenditure within modelled assumptions.

3.3 Training

At a glance...

Training demands are significant, with upfront and ongoing costs for delivery and backfill. If not carefully phased, large-scale upskilling, especially for senior roles, can temporarily affect frontline capacity

The Bill creates new statutory roles and expands duties under Clauses 3-16, which in turn requires a substantial programme of training beyond basic induction (e.g. specialist investigation skills, legal processes, multi-agency practice). The main cost pressures are the development and delivery of training and materials (blended/e-learning and in-person), and the backfill needed while staff attend training, both for initial rollout and for ongoing refreshers linked to turnover.

Progression is essential for retaining experienced staff, but workforce planning could anticipate and mitigate downstream effects such as backfill requirements and increased reliance on agency cover.¹⁷

Potential scrutiny point:

The Committee may wish to ask whether the Department's cost estimates include backfill for all required training and treat refresher sessions as ongoing costs, not one-off expenses. It may also wish to ask how training will be scheduled to avoid putting pressure on frontline services.

¹⁷ [Workforce: recruitment, training and retention in health and social care - Health and Social Care Committee](#)

3.4 Legal Aid

At a glance...

Estimated at £0.9 million per year but sensitive to case volumes, appeal rates, and tariff assumptions.

The Department currently estimates legal-aid expenditure under Clause 21 at around £0.9 million per year. This covers representation for civil protection-order applications (assessment, removal, and banning/temporary banning), any linked production orders, subsequent appeals, and a small number of criminal proceedings arising from breach, obstruction, or ill-treatment.

The volume assumptions are anchored to an estimated 42 protection order cases annually, scaled from the Scottish experience.¹⁸ Where a direct Northern Ireland tariff was not available, Children's Order rates have been used as a proxy. On this basis, appeals are expected to account for the largest share of spending, initial applications and criminal matters comprising smaller proportions.

This estimate remains sensitive to several factors, including early-year caseloads (such as any initial surge), the balance between contested and uncontested applications, and the resulting appeal rate. Additional variables include the number of parties per case who qualify for legal aid and the suitability of applying Children's Order rates to Clause 21 work.

Scotland and Wales provide reasonable comparators, suggesting that order volumes are generally low and appeals infrequent; however, if local patterns differ on any of these dimensions, the cost out-turn could vary.

¹⁸ Data received from Department of Health (08/10/2025)

Potential scrutiny points:

The Committee may wish to explore whether the Department has adjusted for differences in legal complexity, service models, and staffing costs when using child protection orders as a proxy for adult protection orders.

The Committee may wish to ask whether the Department has estimated how demand might evolve over time, for example, beginning with a surge and then levelling off. It may also be helpful to clarify whether key figures, such as the number of legal aid applications and appeals, have been validated with relevant organisations including PSNI and Northern Ireland Criminal Justice System (NICJS).

The Committee may wish to seek clarity on funding contingencies if the number of appeals exceeds the assumptions used in the Department's costing model.

3.5 Other Categories

3.5.1 Trust IT/accommodation

At a glance...

A one-time investment in year 1 to support 200 users, followed by modest ongoing costs from year 2 onward.

Most of the Trust's IT and accommodation costs will be incurred at the outset. In the first year, funding will cover the full set-up for around 200 users, including devices, software, network connections, furniture, mobile phones, and technical support. From the second year onward, only modest ongoing costs are expected, mainly software licences and mobile handset fees.

3.5.2 Adult Protection Board for Northern Ireland

At a glance...

While overall costs are modest, there is a risk of scope expansion and duplication unless clear boundaries are maintained between this work and that of existing bodies.

The Board and its secretariat are intentionally small in scale, operating with a modest team and office space, and limited programme spending. As a result, their costs are relatively low. However, there are some potential hidden pressures to monitor, such as a gradual widening of the remit into operational activities (for example, frequent serious case reviews), uncosted contributions of staff time or other “in-kind” support from partner bodies, and the enabling costs associated with data management, secure information-sharing, and publication. Clear boundaries and good coordination with existing safeguarding structures will help minimise duplication and manage costs effectively.

3.5.3 CCTV

At a glance...

Approximately £288k is projected for year 1, with final costs contingent on the definition of compliance standards and the speed of rollout.

The model includes a first-year allocation of about £288,000 to set up and oversee the new CCTV regime. However, key compliance details, such as site coverage, technical standards, data retention rules, and inspection methods, are still being defined. Providers are expected to face mainly upfront costs for equipment and installation, followed by ongoing storage and maintenance expenses. A phased roll-out with clear guidance and targeted support would help manage these costs and reduce disruption.

3.5.4 Independent Advocates

At a glance...

The estimate is based on 530 cases per year. Key risks include provider capacity, recruitment challenges, and ensuring adequate coverage in rural areas.

The advocacy cost estimate is based on a key assumption: Scottish data suggests Northern Ireland may see around 530 general investigations annually, with approximately 75 per cent requiring an independent advocate. Costs are based on standard hours per case and a benchmark sector rate, adjusted annually. In practice, this equates to about one or two advocacy-supported investigations per Trust each week. Key uncertainties include a potential early surge in inquiries before volumes stabilise, and whether the provider market, especially in rural areas, can recruit and retain sufficient qualified advocates without driving up costs or compromising independence and quality.

3.5.5 IT Changes

At a glance...

A one-time investment of £141k in year 1 is allocated for secure information-sharing systems.

A one-off allocation of £141,000 has been included for year 1 to enable PSNI and Northern Ireland Courts and Tribunals Service (NICTS) to establish secure systems for data handling and information sharing in connection with inquiries and the work of the Adult Protection Board.

3.5.6 Serious Case Reviews (SCRs)

At a glance...

Six reviews per year are costed at £1.45 million over 10 years. However, cost pressures could increase if the review frequency rises or if additional input is required from partner organisations.

The model funds six SCRs each year for the Adult Protection Board, based on the children's Safeguarding Board model and adjusted annually for inflation. It also covers Trust staff time for each review and a 0.5 whole-time equivalent (WTE) Detective Sergeant from PSNI, both with yearly uplifts. The total cost is estimated at about £1.45 million over ten years.

Potential scrutiny point:

The Committee may wish to scrutinise the assumption of six SCRs per year, including whether this figure adequately reflects potential variability, and whether associated costs are fully accounted for should volumes increase.

3.5.7 Provision of new powers for social workers (financial records, offences)

At a glance...

Minor cost (approximately £90k in Year 1), but validation of volume and justice-side costs is needed.

The model anticipates around 42 annual applications for court permission to access records, based on Scottish adult protection data scaled for Northern Ireland. Most are expected to be processed during court hours at minimal administrative cost. A minority, those arising out of hours, incur additional judicial and police support costs. Together, these justice-related inputs create a modest year-1 financial pressure of approximately £90k.

3.5.8 Costs for medical assessments

At a glance...

Medical assessments are costed at £90k in year 1 based on 100 cases, with costs most sensitive to actual case volumes and time per assessment, especially for complex or court-level reports.

Medical assessments are costed on the basis that around 100 cases a year will require a clinician's report. The model assumes about nine hours per case at £100 per hour, giving a first-year provision of approximately £90,000, with a 3% annual uplift thereafter. This cost is most sensitive to the real-world volume of cases and the time needed per assessment, particularly where complex or court-standard reports are required.

Potential scrutiny point:

The Committee may wish to confirm whether the estimated case volumes and assessment hours reflect practice in Northern Ireland, including the mix of routine and court-level reports, and whether the costings account for full staffing costs and clinical capacity.

3.5.9 Impact of Secondary Legislation/Statutory Guidance on Costing

At a glance...

Key operational details, including inquiry thresholds and powers, the Adult Protection Board's remit and reporting duties, and the CCTV regime, will be set out later in secondary regulations/statutory guidance. These elements are not yet fully costed in the EFM, and changes to regulatory scope could affect future spending.

Much of the operational detail will be set out later in secondary regulations, for example, the thresholds and powers for inquiries, the remit and reporting duties

of the Adult Protection Board, and the operation of the CCTV regime. While this flexibility is valuable, it also introduces cost risks not reflected in the EFM figures. Broadening of regulatory scope could lead to ongoing spending increases without further primary oversight. The Committee may wish to consider whether it would be helpful for the Department to share, ahead of time, a timetable and indicative budgets for each set of regulations, including a range of cost estimates and a brief impact summary, to support early assessment of affordability before the rules are formally laid.

Potential scrutiny point:

The Committee may wish to ask the Department to publish, in advance of regulations, a simple timetable and indicative budgets (including best- and worst-case ranges), accompanied by short impact notes. This would allow Members to assess affordability and proportionality before regulations are laid, and to identify any potential cumulative impact from regulatory creep as operational detail expands.

4 Lessons from England, Scotland and Wales

At a glance...

Experience from other UK jurisdictions shows a consistent underestimation of both cost and demand when adult protection laws were first introduced. For Northern Ireland, this suggests a need to plan for sustained demand beyond year 1, along with workforce pressures and multi-agency costs. Upfront scenario modelling and in-year monitoring will be important in assessing affordability.

Experience from other jurisdictions highlights a consistent pattern of initial underestimation of key implementation demands, offering important lessons for Northern Ireland. In England, the Care Act 2014¹⁹ was supported by a £470 million allocation in 2015-16 to aid implementation, though this funding was not specifically itemised for adult protection inquiries. Local authority data indicates that early projections fell short of actual demand with Section 42 safeguarding enquiries rising from approximately 99,805 in 2015-16 to 161,925 by 2021-22.²⁰ Post-implementation reviews have attributed cost overruns to demand being more responsive to public awareness and broad definitions of “harm” than anticipated, alongside increased expenditure driven by systemic and multi-agency coordination challenges.²¹

Post-implementation evaluations of Scotland’s Adult Support and Protection Act 2007,²² initially supported by £14 million (in 2007), have highlighted several cost-related lessons relevant to Northern Ireland.²³ While the Act strengthened adult protection, implementation has varied across regions, with ongoing challenges in training, coordination, and consistency. Governance reviews have

¹⁹ [Care Act 2014](#)

²⁰ [NHS Digital](#)

²¹ [Local Government Association - Analysis of Safeguarding Adult Reviews April 2017-March 2019](#)

²² [Adult Support and Protection \(Scotland\) Act 2007](#)

²³ [Adult support and protection supported self-evaluation overview report: September 2025 – Healthcare Improvement Scotland](#)

identified inter-agency friction and duplication of effort, underscoring the need for clear leadership structures to reduce inefficiencies and reinforce consistent thresholds. Investing early in data infrastructure has enabled targeted interventions and risk identification, lowering long-term costs. Training and supervision gaps have led to delays and increased reliance on expensive agency staff, while poor coordination has resulted in parallel investigations and inefficient use of resources. Inconsistent definitions and decision-making have further inflated costs through repeated audits and policy clarification.²⁴

In Wales, the implementation of Part 7 of the Social Services and Well-being Act 2014²⁵ has led to increased adult protection referrals, workforce pressures, and challenges in service coordination. Evaluation findings have indicated that implementation was uneven and resource-intensive. While multi-agency collaboration has improved, ambiguities in statutory guidance and inconsistent interpretation have created confusion. The rise in referrals has stretched service capacity, contributing to training gaps, process delays, and reliance on agency staff. Outcomes for individuals have varied across regions, reflecting differences in local practice and resourcing.²⁶

The Republic of Ireland does not yet have dedicated adult safeguarding legislation. The Assisted Decision-Making (Capacity) Act 2015, fully commenced in 2023, introduced statutory duties around decision support and capacity but does not cover safeguarding in full. Broader adult protection remains governed by national policy, with legislative reform still under development.^{27 28}

Across jurisdictions, similar patterns have emerged, with referrals increasing sharply and remaining high beyond the first year; multi-agency working proving

²⁴ [Adult support and protection self-evaluation overview report September-2025.pdf](#)

²⁵ [Social Services and Well-being \(Wales\) Act 2014](#)

²⁶ [From Act to Impact? Final Report of the Evaluation of the Social Services and Well-being \(Wales\) Act 2014](#)

²⁷ [Assisted Decision-Making \(Capacity\) Act 2015](#)

²⁸ [A Regulatory Framework for Adult Safeguarding](#)

more costly than expected; and workforce pressures adding further cost and limiting capacity. A key factor was underestimating behavioural change, as once professionals and the public were required and encouraged to report concerns, demand remained high instead of returning to previous levels.

For Northern Ireland, this highlights the importance of cost modelling, alongside early in-year monitoring and adjustment to keep estimates robust while upholding the Bill's protective intent.

Potential scrutiny points:

The Committee may wish to highlight that across the UK cost overruns have consistently stemmed from underestimating behavioural change (i.e. increased reporting once duties become mandatory) and inter-agency demand growth. Early scenario analysis could help anticipate these effects in Northern Ireland.

The Committee may also wish to ask whether post-implementation reviews are built into the financial plan, ideally within 12-18 months, to allow recalibration once actual demand data and workforce impacts are known.

5 Concluding Remarks

The Adult Protection Bill represents a significant step toward addressing long-standing safeguarding gaps. While the financial case is understandably still developing, it will be shaped by decisions made during Committee Stage and informed by the evidence presented.

The current estimate (£12 million annually; £121 million over 10 years, excluding existing Gateway funding) is based on early assumptions, with the majority of new spend concentrated in three demand-sensitive areas: the duty to make inquiries (Clauses 3–9), workforce training (Clauses 3–16), and legal aid linked to protection orders (Clause 21).

Experience from other UK jurisdictions suggests that early increases in referrals, coordination costs, and workforce pressures can exceed initial forecasts if not carefully planned for. Secondary legislation, covering matters such as Adult Protection Board functions, inquiry thresholds, and CCTV standards, will also influence future costs and should be considered as part of the evolving financial framework.

Approaches that build in cost ranges, key assessment points, and early cross-sector monitoring can provide useful flexibility as implementation unfolds. These measures can help support the Bill's delivery while maintaining a strong focus on value for public money and the ability to respond to emerging pressures.