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Assembly

Research and Information Service Briefing Paper

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Review of Costs: Conversion Practices (Criminalisation) Bill

RaISe

Seeking to support Northern Ireland Assembly scrutiny, this Review of Costs addresses key “public purse” implications that could arise from the Conversion Practices (Criminalisation) Bill, if enacted and implemented as introduced. It should be read alongside RaISe Bill Paper NIAR 255-26 (dated 12 October 2026), which addresses policy considerations arising from the Bill.

This information is provided to a Member 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 Conversion Practices (Criminalisation) Bill (the Bill) would be likely to create some additional costs across the criminal justice system and potentially for victim support and health services, the overall scale of those costs remains uncertain given existing data limitations.
- The Bill's accompanying Explanatory and Financial Memorandum (EFM) suggests a low volume of offences would be expected, which would be unlikely to generate significant expenditure.
- During the Bill's Second Stage debate, the Member sponsoring the Bill explained relatively few cases would be likely to progress to prosecution and hence costs would be low.
- During that debate, other Members expressed concern that costs could arise from the need to support vulnerable victims who would engage with criminal justice processes as a result of the Bill's enactment, including services relating to advice, advocacy, counselling or other forms of assistance.
- It is reasonably foreseeable that public purse costs could incur from any police investigations, safeguarding activity, prosecutions and court proceedings arising under the Bill, along with any concerning legal aid services, prisons, probation services and wider offender management arrangements.
- Moreover, public bodies could incur implementation costs, including those relating to staff training, operational guidance, awareness-raising and establishing new procedures.
- Resources also could be required to support relevant data collection, monitoring arrangements and any regulatory or oversight functions that would arise from the legislation.
- The PSNI advised the Research and Information Service (RaISe) that it cannot reliably estimate future costs because no comparable offence currently exists and there is no established baseline from which to forecast demand.

- The Public Prosecution Service for Northern Ireland (PPSNI) similarly stated to RaISe that it is unable to estimate likely referral volumes and has not undertaken detailed costing work.
- Responses received by RaISe from the Department of Justice, Northern Ireland Prison Service and Probation Board for Northern Ireland suggest that any operational costs are likely to depend on the final legislative provisions, reporting levels, case complexity and enforcement activity.
- At the time of writing, available evidence suggests it is reasonably foreseeable that the Bill's implementation costs, if enacted as introduced, could place demands on policing, prosecution and victim support services, but both the scale of such demand and any related public purse cost cannot be robustly estimated due to existing data limitations..

Introduction

This Review of Costs aims to support Northern Ireland Assembly (Assembly) Members in their plenary, committee and constituency capacities, when scrutinising key “public purse” implications that could arise from the Conversion Practices (Criminalisation) Bill – as introduced into the Assembly by a Member of the Legislative Assembly (MLA) - the Bill Sponsor - on 30 June 2026. The Bill seeks to establish a framework of criminal offences that targets “conversion practices”, defined as “practices intended to change or suppress a person’s sexual orientation or gender identity”.

The Paper relies on sources available to RaISe at the time of writing. Those include: the [introduced Bill](#); its accompanying [Explanatory and Financial Memorandum](#) (EFM); the related [consultation on the policy proposals](#); the Bill’s [Second Stage debate](#); and, correspondence between the Research and Information Service (RaISe) and various Executive Departments and public bodies. Its contents are not intended to be exhaustive and are structured as follows:

- [Recap of introduced Bill](#)
- [Public finance context in Northern Ireland](#)
- [Key potential “public purse” considerations](#)
- [Use of secondary legislation](#)
- [Concluding remarks](#)

Any discussion in the Paper about the prevailing law, including existing legislation, is not intended to provide legal advice or opinion. Instead, it seeks to orientate the Paper’s discussion. Please note that the identified key potential public purse implications are not intended to be exhaustive. Included throughout are potential scrutiny points in blue boxes, which Members, including those in the Committee for Communities, may wish to draw on.

1 Recap of introduced Bill

The Bill establishes a framework of criminal offences targeting “conversion practices” intended to change or suppress a person’s sexual orientation or gender identity, alongside definitions, defences, and procedural provisions.

In summary, the Bill establishes a harm-based criminal regime that seeks to address both formal therapeutic practices and informal coercive behaviour, including conduct occurring outside Northern Ireland. It combines broad definitions of prohibited conduct with specific exemptions for regulated healthcare, alongside a general reasonableness defence and provisions protecting expressions of belief and identity affirming support.

Note: RalSe Bill Paper NIAR 255-26 (dated 12 October 2026) addresses policy considerations arising under the Bill.

2 Public finance context in Northern Ireland

Before considering key public purse implications arising from the introduced Bill, some additional context-setting information is provided to highlight the challenging financial and budgetary context in which Assembly Members consider the introduced Bill. Initially, the term “public purse” is defined, followed by an overview summarising the challenging budgetary environment within which the Department for Communities (DfC) currently operating.

2.1 “Public purse” defined

The “public purse” refers to taxpayers’ money raised through taxation and other sources of government revenue. Government departments - including their Ministers and individual officials - are custodians of the public purse – meaning they are required to use public funds “efficiently, effectively and economically.” Moreover, departmental Accounting Officers are personally responsible for ensuring value for money in accordance with public finance management principles.

In Northern Ireland, the public purse comprises the Northern Ireland block grant allocated by His Majesty's (HM) Treasury, locally generated revenues, and any other public funding streams. Any public purse costs that could arise from the Bill would be met by departmental spending, that is, either within the existing Department budget, or through reprioritisation within the Executive's overall spending envelope.

2.2 Budgetary Context: central and devolved

The central and devolved budgetary contexts remain challenging across the United Kingdom, due to a number of contributory factors that are relevant to Assembly consideration of this Bill. Figure 1 below summarises the most significant developments from February 2024 to the time of writing.

Figure 1: Challenging budgetary context - Contributory factors dating from February 2024 to present

Implementation of Political Agreements (February 2024 - Present)

Since the restoration of the Executive in February 2024, Departments have been undertaking work to facilitate the Executive's implementation of political and financial agreements – such as the [Interim Fiscal Framework](#) (May 2024), the [Budget Sustainability Plan](#) (October 2024) and the accompanying [Budget Improvement Plan Roadmap](#) (December 2024), as well as the establishment of [Interim Transformation Board](#) (March 2025). These measures have been broadly targeted to improve the position of Northern Ireland's public finances

Budget Information Gathering Exercise (August-September 2024)

The Department of Finance (DoF) undertook a 2025-28 Budget Information Gathering Exercise, requesting returns from all Northern Ireland Departments, marking the start of the planning stage in the 2025/26 Northern Ireland Executive Budget cycle. The DoF found that “Departments identified a reported £767 million of unfunded pressures”, as [reported](#) to the Assembly on 23 September 2024.

UK Autumn Budget 2024 (October 2024)

The [Chancellor's Autumn Budget 2024](#) set out some of the multi-year competing pressures facing the United Kingdom Government, potentially adversely impacting the Government's spending power in certain areas, along with other decisions relating to social security - see RalSe Briefing Paper 47/24 entitled “[Chancellor's Autumn Budget 2024: initial considerations for Northern Ireland](#)”.

Departmental Bids Exceed Budget Allocation (December 2024)

Northern Ireland Departmental bids for 2025/26 [resource and capital](#) expenditure exceeded the [Northern Ireland Budget](#) allocated by the United Kingdom Government to the Executive.

Later that month, the [2025/26 Draft Executive Budget](#) and accompanying [Written Statement](#) by the Minister for Finance highlighted ongoing “pay and inflationary pressures” and “growing demands” on public services.

UK Spring Statement 2025 (March 2025)

The [Chancellor's 2025 Spring Statement](#) updated the House of Commons on the United Kingdom economy and public finances. Her Statement was accompanied by an Economic and Fiscal Forecast from the [Office for Budget Responsibility](#) (OBR). It also announced a number of policy decisions, which included reforms to the welfare system, increased defence spending and a £3.25 billion (b) [“Transformation Fund”](#) to reform public services. (Important to note this central government development, as the Northern Ireland Executive Budget is a sub-cycle within the United Kingdom Government’s Budget cycle.) DoF officials thereafter explained during the Assembly Finance Committee [meeting](#) that:

.... on the allocations out of that fund, it will depend on which Whitehall departments get allocations from it so we don't get it on the £3.25 billion we'll get it on the allocations

Executive Agrees 2025/26 Budget (3 April 2025)

The Executive agreed the [2025/26 Executive Budget](#), which the Finance Minister [described](#) as “sets out a direction of travel” which “clearly prioritises its Programme for Government priorities”.

US Trade Tariffs (4 April 2025)

The American President announced substantial international trade tariffs, resulting in: plummeting stock markets across the globe; a collapsing American bond market; the subsequent 9 April 90-day pause on some new US tariffs; other countries' similar pauses; further consideration of retaliatory tariffs on the US; and an international trade war arising between the US and China.

US-UK Trade Deal (8 May 2025)

A non-binding trade deal was agreed by between the US and UK Governments. The general terms of the new trade deal were subsequently published in the [UK-US Economic Prosperity Deal](#) (EPD); the deal non-binding, meaning on-going further negotiations to work through the detail of the deal.

Executive Spending Plans Published (24 June 2025)

The DoF published its [2025-26 Budget Factsheet](#), setting out the Executive’s spending plans for the one-year period from 1 April 2025 to 31 March 2026.

Finance Minister Written Statement (3 October 2025)

The Executive's Finance Minister provided a Written Ministerial Statement detailing [Treasury Funding Available 2026-2029/30](#).

UK Autumn Budget 2025 (26 November 2025)

The Chancellor's Autumn Budget 2025 detailed the United Kingdom Government's resource spending plans up to 2028/29 and capital plans up to 2029/30.

NI Draft Multi-Year Budget (6 January 2026)

The Finance Minister published the [Draft Budget 2026-2029/30](#) (not Executive agreed) and announced an eight-week public consultation on the proposals.

Treasury Agrees £400m Reserve Claim (11 February 2026)

HM Treasury [agreed](#) a reserve claim for the Northern Ireland Executive, to provide £400 million for 2025/25, which is to be repaid over three years. The Finance Minister confirmed in a [written statement](#) that same day that the £400 million would be allocated as follows, as agreed by Executive:

- Department of Education - £214.6 million
- Department of Health - £185.4 million

Treasury Agrees £400m Reserve Claim (11 February 2026)

The [Chancellor delivered her Spring Forecast 2026](#)

Later that day, in an [Oral Statement](#) to the Assembly, the Finance Minister confirmed additional £390 million Barnett consequentials over the next three-year period, comprising: Resource DEL - £380 million; and, Capital DEL - £9 million

UK Spring Forecast 2026 (3 March 2026)

The Chancellor delivered her [2026 Spring Forecast](#). Later that day, in an Oral Statement to the Assembly, the Finance Minister confirmed additional £390 million Barnett consequentials over the next three-year period, consisting of £380 million RDEL and £9 million CDEL.

Update on Multi-Year Budget Discussions (16 April 2026)

Speaking publicly following a meeting of Executive Ministers, the deputy First Minister stated that the Executive wanted a multi-year Budget agreed "as quickly as we can". She added:

...but the reality is that there is a very, very significant shortfall...the moment that Budget would be agreed, unless we secure additional resource from the Treasury, would simply lead to significant cuts and massive impacts in terms of our public services and on the people that we are here to serve.

The Finance Minister echoed these sentiments, stating that "to achieve the ambition of the Budget is going to take an injection of investment from the British Government."

Parties Meet SoSNI on Budget Progress (2 July 2026)

Speaking after the meeting, Hilary Benn MP said they had "agreed a programme of work" that will "look, first of all, at the pressures that the Executive's finances are facing".

He said the work would also look at the Executive's plan for "fiscal sustainability, efficiencies and public service transformation".

Budget Act Deadline Passes (31 July 2026)

As the Executive were unable to pass a Budget by this deadline, an automatic departmental expenditure limit of 95% of last year's funding was triggered under public finance laws.

Executive Writes to PM on Financial Pressures (13 August 2026)

The Executive collectively [wrote](#) to PM Andy Burnham, calling for a "fair funding envelope". The letter said the current funding from Westminster 'does not provide a sufficient basis to fund public services' in NI.

SoSNI Statement on Budget Impasse (24 August 2026)

SoSNI Chris Bryant MP [said](#) the Executive will have to engage in 'self-help' and look at revenue raising to resolve Northern Ireland's budget issues. He further added "I understand the financial pressures that there are in Northern Ireland, and I'm very happy to take them very seriously".

PM confirms SoSNI talks on the Budget (2 September 2026)

In response to a question at PMQs, the PM stated:

Our first responsibility is to get Stormont government up and running and functioning properly with a budget. I have empowered the Northern Ireland Secretary to go into talks to resolve that issue, and we can continue the conversation on the broader issues about reform once we have got that in place.

2.3 Draft Budget 2026-29/30: DfC and DoJ allocations

On 6 January 2026, the Finance Minister published a Written Ministerial Statement in the Assembly about the Draft Budget 2026-29/30. The Statement outlined proposed funding allocations for Resource Departmental Expenditure Limits (RDEL) and Capital Departmental Expenditure Limits (CDEL) during the

specified period, including the DfC and DoJ, as reproduced below in Tables 1 and 2.

Table 1: Proposed DfC Budget Outcome 2026-29/30, £million¹

Funding	2026-27	2027-28	2028-29	2029-30
Resource DEL	922.0	944.3	960.3	-
Capital DEL	294.9	319.2	321.7	404.1
Total DEL	1,216.9	1,263.5	1,282.0	404.1

Source: Draft Budget 2026-29/30

At the time of writing, the Draft Budget remains unagreed by the Executive. During Oral Questions in the Assembly on 18 May 2026, the Communities Minister stated:

...[the Department of Finance] has not been funding the social housing development programme adequately. To achieve 5,850 starts by May 2027 will be extremely challenging, and it will require sufficient budget being provided to my Department, and for that to be provided early in the financial year...

...if you want more social homes, you have to fund them, and right now, I have not been given that funding...

...I need more finance, and I will do everything that I can to get that.²

¹ Draft Budget 2026-29/30, Department of Finance, available [here](#).

² Official Report, 18 May 2026, page 37. Available [here](#).

Table 2: Proposed DoJ Budget Outcome 2026-29/30, £million³

Funding	2026-27	2027-28	2028-29	2029-30
Resource DEL	1,575.4	1,497.2	1,525.7	-
Capital DEL	117.7	116.0	113.0	121.8
Total DEL	1,693.1	1,613.2	1,638.7	121.8

For purposes of this Paper, the above context-setting importantly highlights the extent of existing financial pressures which the Executive as a whole faces, and which DfC and DoJ face in particular.

Potential scrutiny points:

1. Facing serious budgetary challenges and competing pressures, how would the Minister for Communities and the Minister for Justice ensure there would be appropriate resourcing to ensure the Bill's full implementation, if enacted as introduced?
2. How did the DfC and the DoJ factor the potential costs arising from this Bill, as introduced, into its return for the Department of Finance's Budget 2025-28 Information Gathering Exercise?
3. Did the DfC and the DoJ factor into that consideration requirements/conditions arising from the Executive's agreed Budget Improvement and Sustainability Plan?

³ Draft Budget 2026-29/30, Department of Finance, available [here](#).

4. The Members may wish to also contact DfC and the DoJ seeking their assessment of the potential financial impact the Bill could have on its finances and those of the wider justice system, if enacted and implemented as introduced?

3 Key potential public purse considerations

This section addresses public purse cost considerations arising from: the [Bill as introduced](#), drawing on the following available sources: the Bill's accompanying [EFM](#); responses received to [the Bill Sponsor's public consultation](#); the Bill's [Second Stage debate](#) in the Assembly on 15, 22 and 28 September; and, correspondence between RaISe and various Executive Departments and public bodies regarding the Bill's public purse implications.

Additionally, it provides an overview of key potential areas where public purse costs could arise if the current Bill is enacted and implemented as introduced. Those areas relate to prosecution, regulatory oversight and victim support services.

3.1 EFM

The [EFM](#) accompanying the introduced Bill provided some consideration of the Bill's potential financial effects. It stated:

The Bill is not intended to carry significant costs. The Bill Sponsor intends the legislative requirements focus only on serious and sufficiently harmful conduct, and as such, considers that it is likely to be a low volume offence with a strong deterrent effect.

The EFM continued:

The Bill, if enacted, would create a potential 'public impact' on departmental resources in terms of developing and producing guidance for when the Bill is implemented. This will be an important element of ensuring the Bill's offences are appropriately understood

and communicated to the public. The Bill Sponsor is satisfied that this should be proportionate.

And:

The Bill will also have public purse implications with regards to the PSNI in terms of their general costs and staffing requirements related to enforcement. The PSNI advised that they were not in a position to provide estimates of any additional resource requirements that might arise from the proposed Bill. The Bill Sponsor is keen to engage further on considering what is required to deliver enforcement of the Bill.

3.2 Key financial-related consultation responses

The [Member's public consultation](#) was launched on 5 December 2024 and closed on 28 March 2025, following an extension of one week. In total, 1,291 responses were available for analysis, as recorded in the [consultation summary report](#) published in October 2025, including those addressing the proposals' potential financial implications. Specifically, 555 respondents answered Question 16 of the consultation, which asked:⁴

Do you have any comments on the likely cost/financial implications of the proposed legislation?

Responses to Question 16 were relatively limited when compared with other aspects of the consultation. Nonetheless, they identified a range of possible financial implications, including those arising from the new specific criminal offence for the justice system, such as those concerning the development and implementation of systems and related policies, practices and procedures, including guidance relating to:

- Investigations, prosecutions and imprisonment
- Training professionals and staff

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https://assets.nationbuilder.com/allianceparty/pages/28031/attachments/original/1761146460/Bannin_g_Conversion_Practices_Summary_Report.pdf

- Appropriate safeguarding and support pathways for victims.

A number of responses suggested the overall financial impact would likely be modest or manageable, particularly where existing legal frameworks and enforcement structures could be relied on. Others argued any upfront costs would need to be weighed against the longer term social and economic benefits of the new offence preventing harm, including reduced mental health service demand and improved wellbeing outcomes.

3.3 Second Stage debate: cost considerations

During the [Second Stage debate](#) on 22 September, Members raised concerns about the Bill's potential financial implications. One Member stated:⁵

...the cost will be significant. We are talking about vulnerable victims, so there will be a significant cost to the advocacy and help required to get them through the process. I wonder whether significant efforts were made to cost that or compare it with any similar types of policing or types of offences, because I genuinely feel that the costs will be significant.

In turn, the Bill Sponsor responded:⁶

...because the intent test is hard to meet, the incidence of such cases being prosecuted is very low. It will be a low-volume and high threshold offence in terms of prosecutions, so, if it provides any assurance to the Member, I do not think, on the basis of my understanding of similar legislation internationally, that we will see huge numbers of cases coming to the courts.

⁵ <https://www.niassembly.gov.uk/assembly-business/legislation/2022-2027-mandate/primary-legislation-bills-22-27-mandate/conversion-practices-criminalisation-bill/>

⁶ As cited immediately above.

3.4 Prosecution-related costs

3.4.1 PSNI

RaISe contacted the PSNI seeking information on potential costs of the introduced Bill relating to: expected demand, investigation activity; cost estimates including implementation costs; and, any additional observations. Below is a series of tables outlining the PSNI response under each area.

Table 1: Expected demand⁷

RalSe Question	PSNI Response
Does PSNI currently receive complaints relating to alleged conversion practices, whether recorded under existing offences or other incident categories?	<i>PSNI does not currently have a dedicated crime-recording category for conversion practices, as there is no standalone offence specifically covering such conduct. Allegations may nevertheless be reported and recorded where the circumstances disclose an existing criminal offence, including assault, threats or intimidation, harassment, controlling or coercive behaviour, domestic abuse, sexual offending, false imprisonment, child cruelty or other relevant offending.</i>
If so, what is the average number of these complaints per year?	<i>It is not currently possible to provide a reliable figure. Conversion practices are not a standalone offence or recording category, and relevant allegations may be recorded under a range of existing crime or incident classifications. A retrospective search would therefore be unlikely to produce a complete or reliable dataset.</i>
Are there existing offence types, which PSNI considers analogous for estimating likely demand under the proposed legislation?	<i>Potentially relevant comparators for investigative activity include allegations involving controlling or coercive behaviour, harassment, threats or intimidation, common assault and more serious assault, sexual offending, false imprisonment, child cruelty or neglect, and domestic abuse.</i> <i>These are not direct legal comparators and should be used only to illustrate potential investigative complexity and resource requirements. The applicability of any comparator will depend on the final form and scope of the legislation.</i>
Based on operational experience, what annual volume of investigations might	<i>PSNI cannot reliably forecast the annual number of reports, recorded crimes, investigations or prosecutions at this stage. The proposed criminal threshold may mean that the number of cases ultimately meeting the threshold for an offence is limited. However, the volume of reports,</i>

⁷ Correspondence from the PSNI to RalSe, dated 18 August 2026.

reasonably be anticipated under the proposed legislation?	<i>safeguarding referrals and initial assessments may be higher. Demand will depend on the final statutory provisions, public awareness, reporting behaviour, professional referrals, interpretation of the legislation, prosecutorial practice and the extent to which conduct is already investigated under existing offences.</i>
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Table 2: Investigation activity⁸

RaISe Question	PSNI Response
What investigative activities would typically be required in relation to offences created by the proposed Bill?	<i>Subject to the circumstances of the allegation and the final legislative provisions, an investigation may involve:</i> <i>• Obtaining initial accounts from the complainant and relevant witnesses;</i> <i>• Conducting an immediate safeguarding and risk assessment, including consideration of children and vulnerable adults;</i> <i>• Assessing whether the alleged conduct meets the statutory definition and evidential threshold for an offence;</i> <i>• Making enquiries to establish intent, the nature and impact of the alleged conduct, and any relevant pattern of behaviour;</i> <i>• Obtaining and examining relevant digital, documentary, medical and third-party material, where necessary and proportionate, in accordance with applicable legal and disclosure requirements;</i> <i>• Identifying suspects, considering arrest or voluntary attendance where appropriate, conducting searches and seizures, and interviewing suspects;</i>

⁸ Correspondence from the PSNI to RaISe, dated 18 August 2026.

	• <i>Liaising at an early stage with the Public Prosecution Service;</i> • <i>Considering specialist safeguarding measures, support arrangements and multi-agency engagement; and</i> • <i>Undertaking cross-border or international enquiries where these are relevant to the alleged conduct.</i> Where the final legislation creates a civil protection-order regime, there may also be demand associated with applications, evidential statements, service and enforcement of orders, breach investigations, risk management and liaison with courts and partner agencies.
How many officer hours might an average investigation require?	<i>PSNI cannot provide a reliable average officer-hour estimate at this stage. Investigation time will vary substantially according to the circumstances and complexity of the individual case. Relevant factors may include the number of victims, suspects or witnesses; victim vulnerability and safeguarding needs; the volume and complexity of digital or third-party material; the need for specialist or expert evidence; the requirement for court applications or protection orders; and any cross-border or international element.</i> <i>A straightforward allegation may have investigative features comparable to an existing harassment or domestic-abuse investigation. Cases involving significant psychological harm, vulnerable victims, multiple witnesses, substantial digital evidence, specialist evidence, organisational suspects or cross-border activity could require materially greater resources.</i>
Would investigations likely require specialist safeguarding, digital forensics, or expert evidence?	<i>Potentially, yes. Depending on the individual circumstances, cases may require:</i> • <i>Specialist safeguarding assessment and multi-agency arrangements;</i> • <i>Examination of digital devices, communications and online material;</i> • <i>Medical, psychological or other expert evidence, where necessary and proportionate;</i> • <i>Specialist interviewing skills or support for vulnerable victims and witnesses; and</i>

	• <i>Cross-border or international investigative enquiries.</i> <i>These requirements would not arise in every case but may be significant drivers of time and cost in more complex investigations.</i>
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Table 3: Cost estimates including implementation costs⁹

RaISe Question	PSNI Response
Can PSNI provide an estimate of the average cost of investigating a case of this nature?	<i>PSNI cannot provide a reliable average unit-cost estimate at this stage. Any estimate would require assumptions about the volume of demand and the expected mix of case complexity and would therefore carry a significant degree of uncertainty.</i> <i>A costed estimate would require, at a minimum:</i> • <i>An agreed demand assumption;</i> • <i>A defined case mix or complexity profile;</i> • <i>Anticipated investigative, supervisory and administrative hours by role;</i> • <i>Assumptions relating to specialist safeguarding activity;</i> • <i>Assumptions relating to digital or forensic examination;</i> • <i>Any costs associated with expert evidence, legal advice and court-related activity; and</i> • <i>Appropriate organisational overheads.</i> <i>Without these inputs, a single average cost figure would risk being misleading.</i>

⁹ Correspondence from the PSNI dated 18 August 2026.

Are there published or internal unit-cost estimates that could be used for legislative cost modelling?	<i>PSNI has internal methods that can support cost modelling. However, these would require an agreed set of assumptions concerning the expected volume and complexity of cases, officer and staff hours, specialist resources, digital or forensic examination, expert evidence, court-related activity and associated overheads.</i> <i>Given the range of business areas potentially involved and the absence of a clear demand baseline, PSNI cannot currently provide a robust unit-cost estimate for the proposed offences. Any model should clearly set out its assumptions, sensitivity analysis and limitations.</i>
Implementation Costs	
RaISe Question	PSNI Response
Would new operational guidance be required?	<i>Yes. If enacted, PSNI would require operational guidance to support the consistent identification, recording, assessment, safeguarding and investigation of offences created by the legislation.</i> <i>Guidance would need to reflect the final statutory definitions, evidential requirements, any relevant exclusions or defences, safeguarding obligations, recording arrangements, investigation standards and arrangements for engagement with the Public Prosecution Service and relevant partner agencies.</i>
Would officer training be necessary and, if so, what would be the estimated cost of developing and delivering such training?	<i>Training is likely to be required to ensure that officers and relevant staff understand the new offences, statutory definitions, evidential requirements, safeguarding considerations and recording obligations.</i> <i>The likely requirement would be tiered and may include:</i> <i>• Awareness material for frontline officers and relevant contact-management staff;</i> <i>• Operational guidance for supervisors and decision-makers;</i> <i>• More detailed learning for investigators, safeguarding personnel and relevant specialist teams; and</i> <i>• Updates to relevant policy, guidance and existing learning products.</i>

	<i>The cost cannot be estimated reliably until the final legislative provisions, commencement timetable and delivery model are known. Cost will depend on the training content, target audience, delivery method, release requirements, whether existing material can be adapted and the extent of specialist input required.</i> <i>Implementation may also require amendments to crime-recording classifications, incident and case-management systems, management-information reporting, referral pathways and safeguarding processes. The scale and cost of this work cannot be assessed until the final statutory and operational requirements are settled.</i>
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Table 4: Additional Observations¹⁰

RaISe Question	PSNI Response
What factors are likely to be the principal drivers of cost?	<i>The principal potential cost drivers are likely to include:</i> <i>1. Investigation time, including supervision and case-file preparation;</i> <i>2. The complexity, volume and nature of evidence, including digital and third-party material;</i> <i>3. Safeguarding and multi-agency risk-management requirements;</i> <i>4. Specialist resources, including digital forensics, specialist investigators and expert evidence where required;</i> <i>5. Applications for, service of and enforcement activity associated with any protection-order regime;</i> <i>6. Training, operational guidance, policy development and communications;</i>

¹⁰ Correspondence from the PSNI to RaISe, dated 18 August 2026.

	<i>7. Changes to data, recording, case-management and management-information systems;</i> <i>8. Engagement with the Public Prosecution Service and court-related activity; and</i> <i>9. Cross-border or international enquiries.</i>
Are there any other operational or financial implications that PSNI considers relevant to assessing the impact of the proposed Bill?	<i>PSNI considers that the proposed legislation is likely to generate some additional demand. However, the scale cannot presently be quantified with confidence.</i> <i>It is important to distinguish between gross demand and net additional demand. Some conduct that may fall within the scope of the proposed offences is already capable of being investigated under existing legislation. Conversely, the creation of a specific offence may result in additional reporting, safeguarding referrals, recording activity and early investigative assessment, even where a report does not result in a recorded crime, prosecution or conviction.</i> <i>The UK Government published a draft Conversion Practices Bill for England and Wales in June 2026, alongside a draft final-stage impact assessment. The draft Bill does not currently extend to Northern Ireland. Its accompanying material may nevertheless provide a useful contextual comparator. Any comparison would need to account for differences in legislative provisions, population, policing structures, recording practices, available services and the operation of the justice system in Northern Ireland.</i> <i>PSNI is not aware of published or internal material that would permit a robust Northern Ireland specific forecast of demand or expenditure at this stage. Should more detailed modelling be required, PSNI would need agreed assumptions on the final legislative provisions, anticipated demand, case complexity and implementation requirements.</i>

In summary, PSNI's response to RalSe – as set out in the above tables - states it currently cannot provide a robust estimate of the likely demand, investigative workload, or financial implications that could arise under the proposed Bill. PSNI explains that primarily this is because conversion practices are not currently classified or recorded as a standalone offence, making it difficult to establish a reliable baseline from which future demand could be estimated.

PSNI's response also suggests that allegations arising under the proposed legislation would likely share characteristics with existing offences such as harassment, coercive control, domestic abuse, assault, and child protection cases. Consequently, PSNI explains investigations could involve significant safeguarding assessments, digital evidence gathering, specialist interviewing, multi-agency working, and, in some cases, cross-border enquiries. It therefore observes that the complexity of those factors could result in considerable resource requirement variability between cases.

Furthermore, the PSNI identifies several potential cost drivers, including investigation and supervision time, specialist forensic and safeguarding resources, training requirements, development of operational guidance, changes to recording and case-management systems, court-related activity, and any protection-order regime established by the legislation. It, however, highlights meaningful cost modelling would require agreed assumptions regarding case volumes, complexity, and the final form of the legislation.

Overall, while the PSNI anticipates the Bill would generate some additional policing demand, it concludes that the scale of any operational or financial impact cannot be quantified with confidence at this stage, noting the considerable uncertainty surrounding expenditure estimates and the need for further analysis once the legislative framework and implementation arrangements would be finalised.

3.4.2 Public Prosecution Service Northern Ireland

Additional costs also could arise for the Public Prosecution Service Northern Ireland (PPSNI) and the courts in relation to case preparation, prosecutions and appeals. Overall expenditure could be limited if the volume of cases would be low, but some cases could require significant resources due to evidential complexities and the need to consider competing rights, including freedom of religion and expression. These latter factors could increase the time required for investigations and legal proceedings.

With the above in mind, RalSe contacted the PPSNI in relation to caseload assumptions, implementation costs, any specialised legal expertise, training or guidance that would be required and the estimated costs of any expert witnesses that may feature future cases. The PPSNI responded as follows:¹¹

....the PPS has not undertaken any detailed research with regard to the financial or other implications of the Conversion Practices (Criminalisation) Bill to date. As this is a new area of law, we are unable to provide an estimate of the likely number of cases that may be referred annually under the provisions.

Potential scrutiny points:

5. What further information or detail would assist the PPS in assessing the potential impact of the Bill on prosecution caseloads and resources?
6. Does the PPS anticipate any requirement for specialised legal expertise, training or prosecutorial guidance should the Bill be enacted?
7. How does the PPS intend to assess and prepare for any evidential or legal complexities arising from cases involving

¹¹ Correspondence from the PPSNI to RalSe, dated 5 August 2026.

competing rights, such as freedom of religion and freedom of expression?

3.4.3 Legal Aid

RaISe also contacted the Department for Justice (DoJ) in relation to the potential legal aid costs arising from the Bill. Specifically, RaISe asked if the DoJ could provide information on:

- The proportion of defendants receiving criminal legal aid in comparable offence categories
- Average legal aid expenditure per case
- Factors that may influence case costs
- Whether these cases are likely to generate expenditure above or below average criminal case costs
- Whether any implementation or guidance costs are anticipated and if so, what are they?

The DOJ responded:¹²

...as a result of the detail available at this early juncture it is difficult to provide a definitive response to the issues raised. In terms of factors that may influence case costs, the most obvious considerations are:

- *Whether counsel are instructed;*
- *Whether senior counsel are instructed;*
- *Whether an Exceptional Preparation (EP) application is made (which may be likely given this would be a new offence); and*
- *The length of any trial.*

As with all new offences which are created, we would also anticipate additional costs relating to staff training required to

¹² Correspondence from DoJ to RaISe, dated 10 September 2026.

support case administration, IT changes to the LAMS system, etc.

3.4.4 Northern Ireland Prison Service

RaISe contacted the Northern Ireland Prison Service (NIPS) seeking information regarding: the average annual cost of a prison place; the marginal cost of accommodating an additional prisoner; and, any anticipated implementation or staff-training requirements, including any cost implications, following potential enactment of the Bill. The NIPS response stated:¹³

The marginal cost has been based on the Cost Per Prisoner Place (CPPP) CPPP (in line with previous responses) - CPPP for 2025-26 was £57,056.

And:

NIPS do not anticipate any significant cost in relation to training or staff awareness. It is likely on the Bill's approval any awareness or specific training for specific staff would be achieved in normal business within minimal impact.

Potential scrutiny points:

8. Has NIPS' assessment of the Bill's likely impact on the prison population changed since its initial response to RaISe? If so, how?
9. Can NIPS provide an updated assessment of any resource, accommodation or staff-training implications arising from the Bill's implementation?

3.4.5 Probation Board for Northern Ireland

¹³ Correspondence from DoJ to RaISe, dated 11 September 2026.

RaISe asked the Probation Board for Northern Ireland (PBNI) for information in relation to:

- Average costs associated with probation supervision.
- Average costs associated with community-based disposals.
- Factors influencing supervision costs.

The PBNI responded as follows:¹⁴

...supervision cost is not a fixed cost but is based on the related offences and the level of risk and issues that a Service User presents with e.g. substance misuse. As such costs for community supervision could range from £2-20k per annum for a service user, with additional costs for any behavioural programmes or psychology support.

Furthermore, RaISe asked the PBNI for information in relation to potential demand impacts and any anticipated implementation, guidance or training requirements. PBNI responded:¹⁵

PBNI does not anticipate any material operational, staffing or financial impact arising from the Bill. Any guidance or awareness requirements would be expected to be minor and accommodated through existing arrangements, with no significant additional costs anticipated.

And:

At this stage, PBNI would expect any training requirement to be limited in scope and capable of being delivered within existing resources, with no significant additional expenditure anticipated.

¹⁴ Correspondence from DoJ to RaISe, dated 11 September 2026.

¹⁵ As cited immediately above.

3.5 Regulatory oversight

It is reasonably foreseeable that the introduction of new offences could generate expenditure associated with monitoring and tracking cases through the criminal justice system. Moreover, that could require enhancements to existing information systems used by the PSNI, the PPSNI and the NIPS, or the development of additional processes to ensure relevant data could be collected and analysed effectively. Additionally, information relating to reports, investigations, prosecutions and outcomes would need to be captured in a consistent manner, potentially necessitating changes to current recording practices.

Also, additional staff resources could be required to manage data collection, facilitate information sharing between agencies and undertake ongoing analysis. Costs could further arise from the development of guidance, staff training and quality assurance arrangements aimed at promoting consistent recording standards across organisations involved in enforcement and safeguarding activities.

Costs also could be incurred to assess the effectiveness of the legislative framework over time. In the absence of robust baseline information, there could be a requirement for research and evaluation activity to establish prevalence levels, examine implementation issues and measure outcomes. Such work could include: commissioned studies; stakeholder consultation exercises; and, independent reviews.

Ongoing evaluation could involve both quantitative and qualitative research, undertaken in partnership with government departments, regulatory bodies, voluntary sector organisations and or academia. Additional resources could be needed to support the publication of findings, periodic reviews of the legislation and any subsequent policy development arising from emerging evidence. While these activities could contribute to informed decision-making and evidence-based implementation, it seems they would also be likely to require dedicated analytical expertise and associated funding.

Potential scrutiny point:

10. What assessment, if any, has the DfC or other Executive Departments, undertaken of potential costs and resource implications associated with recording, monitoring and sharing data on offences under the Bill, if enacted and implemented as introduced, including any changes that would be required to existing information systems across relevant agencies?

3.6 Victim Support Services

The provision of support for individuals who have experienced conversion practices could give rise to additional expenditure across health and support services. That could include the commissioning of specialist, trauma-informed interventions designed to address the psychological and emotional impacts associated with such experiences. Demand also could arise for dedicated counselling services, therapeutic support, crisis response provision and other forms of assistance delivered through health and social care structures.

Resources also could be needed to ensure services are capable of responding appropriately to complex cases, including those involving safeguarding concerns, and that support would need to be delivered in a manner that would be sensitive to the diverse backgrounds and circumstances of those affected. Further investment could be required to improve coordination between statutory agencies and community-based organisations so that individuals could access support through clear and effective referral routes.

Additional financial implications could stem from incorporating these support arrangements into existing healthcare and funding frameworks. Existing mental health and talking-therapy services could require increased capacity to accommodate any additional demand generated by the legislation. Costs could also be associated with improving the collection and analysis of service-level data to support funding decisions and resource planning.

Although some training requirements could be met through established professional development arrangements and existing inter-agency agreements, it is reasonably foreseeable that expenditure still would be likely to be incurred in equipping practitioners with the knowledge and skills necessary to deliver consistent, trauma-informed care. While these measures could contribute to a more effective and coordinated support system, they could place further pressure on service budgets, particularly during the early stages of implementation and service development.

Potential scrutiny points:

11. What assessment, if any, has the DfC or other Executive Departments undertaken of any potential demand for counselling, mental health and other support services that could arise from the Bill, if enacted and implemented as introduced?
12. What additional funding or resources could be required by Executive departments to provide trauma-informed support, staff training and effective referral pathways for individuals affected by conversion practices, if the Bill would be enacted and implemented as introduced?

4 Use of secondary legislation

Clause 4, as introduced, requires the enactment of secondary legislation by “Draft Affirmative Resolution” under Assembly Standing Orders to give the Bill its full effect – that is:

- “Draft Affirmative Resolution”: Requires Assembly approval of the subordinate legislation before it could become effective – i.e. come into operation.

Potential scrutiny point:

13. If the Bill would be enacted and implemented as introduced, the Committee for Communities may wish to ask the DfC and/or the DoH for any costings it would compile when formulating any of the specified secondary legislation under this Bill, to ensure that the public purse implications of such secondary legislation would receive adequate Assembly scrutiny.

5 Concluding remarks

The evidence considered in this Review of Costs suggests that enactment and implementation of the introduced Bill would give rise to some additional costs for the public purse across the criminal justice system and, potentially, across victim support and health services, potentially impacting budgets of a number of Executive departments. However, the scale of those costs remains uncertain and cannot currently be quantified with confidence.

According to the EFM, the introduced Bill, if enacted and implemented, would be expected to result in a low number of offences and therefore would not be anticipated to generate significant costs. Similar views were expressed during the Bill's Second Stage debate, when the Bill Sponsor stated he believed the proposed intent test and evidential threshold would result in relatively few prosecutions. Conversely, concerns were raised by other Members during Second Stage regarding potential costs associated with supporting vulnerable victims through criminal justice processes.

RaISe correspondence with PSNI, PPSNI, NIPS and PBNI indicates the principal areas of potential expenditure would likely arise from:

- police investigations and safeguarding activity;
- prosecution and court proceedings;
- legal aid expenditure;
- imprisonment, probation and offender management;

- staff training, guidance and implementation activity;
- data collection, monitoring and regulatory oversight arrangements; and
- the provision of support services for victims.

The PSNI advised RalSe that it is unable to provide reliable estimates of future demand or costs at this stage because no equivalent offence currently exists and there is no robust baseline from which to model future activity. Similarly, the PPSNI stated that it has not undertaken detailed assessment work and cannot estimate likely referral volumes. Moreover, responses from the DoJ, NIPS and PBNI to RalSe further indicate that while some implementation and operational costs could arise, these would be expected to be limited and largely dependent on the final form of the legislation, reporting behaviour, case complexity and enforcement levels.

Collectively, the available evidence suggests that the most likely costs associated with the Bill would stem from implementation activities and any additional policing, prosecutorial and victim support demand generated following enactment. While these costs may ultimately prove modest if case volumes remain low, significant uncertainty remains.