



Northern Ireland  
Assembly

## Research and Information Service Briefing Paper

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# Review of Costs: Marriage and Civil Partnership Bill

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Seeking to support Assembly scrutiny, this Review of Costs addresses key potential “public purse” implications arising from the Marriage and Civil Partnership Bill, if enacted as introduced. The Bill increases the minimum age for marriages and civil partnerships, as well as placing non-religious ‘belief’ marriages on the same statutory footing as religious marriages, thereby amending existing law.

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, nor as a substitute for it.

## Key points

- On 16 March 2026, the Minister of Finance introduced the Marriage and Civil Partnership Bill (NIA Bill 30/22-27)<sup>1</sup>. In short, the Bill increases the minimum age for marriages and civil partnerships from 16 to 18. Alongside this, the Bill formalises temporary arrangements that have enabled belief marriages to be solemnised on the same basis as religious marriages under the oversight of the Registrar General, as introduced by the then Finance Minister in 2020<sup>2</sup>, following on from the 2017 *Smyth* judgement<sup>3</sup>.
- The Bill's accompanying Explanatory and Financial Memorandum (EFM)<sup>4</sup> states the Bill would not place any financial burden on the public purse, nor the general public<sup>5</sup>, if enacted as introduced. The EFM, however, does not detail the Department of Finance's (DoF's) underlying rationale for its assessment; nor does it provide any supporting evidence.
- To support Assembly scrutiny of the Bill, the Public Finance Scrutiny Unit (PFSU) in RaISe compared cost assessments compiled for equivalent legislation in two other jurisdictions - namely, England and Wales<sup>6</sup> and Scotland<sup>7</sup> - and found costs were similar. For both, they were low and primarily "one-off" in nature; largely concentrated in administrative system updates and criminal justice training, rather than substantial recurring operational expenditure.
- Relying on those assessments for purposes of the introduced Bill, RaISe-PFSU calculated proportional, population-adjusted cost estimates.

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<sup>1</sup> Marriage and Civil Partnership Bill, NIA Bill 30/22-27. Available [here](#).

<sup>2</sup> Letter from the DoF to the Finance Committee, Annex A, paragraph 6, page 3.

<sup>3</sup> Under this *de facto* system, more than 2,600 belief marriages conducted since 2020 alone (Letter from the DoF to the Finance Committee, Annex A, paragraph 7, page 3.)

<sup>4</sup> Marriage and Civil Partnership Bill: Explanatory and Financial Memorandum, NIA Bill 30/22-27 EFM. Available [here](#).

<sup>5</sup> NIA Bill 30/22-27 EFM, Financial Effects of the Bill, page 6. Available [here](#).

<sup>6</sup> The Marriage and Civil Partnership (Minimum Age) Act 2022 represents relevant legislation in the context of England and Wales. Available [here](#).

<sup>7</sup> The Marriage (Scotland) Act 1977 represents the relevant legislation currently in place in the context of Scotland, however the comparative analysis in this Paper focuses on a recent consultation on family law reforms in Scotland. Available [here](#).

- Those comprised one-off transition costs for Northern Ireland in the range of: approximately **£16,000–£35,000** for system and administrative updates within the General Register Office for Northern Ireland (GRONI); approximately **£35,000** for the Police Service of Northern Ireland (PSNI); approximately **£35,000** for the Public Prosecution Service (PPS), both for training and familiarisation; and, negligible ongoing annual costs are expected.
- **RaISe-PFSU estimates are based on proportional scaling calculations – meaning they are based on population-adjusted estimates from comparable jurisdictions – and aim to inform scrutiny of the Bill’s potential public purse implications, in particular that undertaken by the Assembly’s Committee for Finance. Whilst RaISe has utilised the information and data available at the time of writing, the estimates provided are exploratory in nature and therefore should not be read as definitive costing outlines.**
- The General Register Office for Northern Ireland (GRONI) confirmed to RaISe-PFSU that changes to printed forms and IT systems would be anticipated as a consequence of this introduced Bill, if enacted. It, however, explained that no cost assessment would be undertaken until the full requirements of the introduced Bill were known.
- Nonetheless, RaISe-PFSU received confirmation from GRONI in April 2026 that implementation costs would arise, for example, in changes to printed forms and some IT functionality, if the introduced Bill was enacted; albeit GRONI had not quantified those costs when compiling this Review of Costs.
- It is important to note the Bill’s most potential significant financial consequences, such as those that could arise from reductions in the harms associated with child marriage, cannot be monetised using a standard cost-benefit methodology. RaISe-PFSU note research evidence linking child marriage to early school-leaving, diminished career and vocational prospects, adverse physical and mental health outcomes, developmental difficulties for children born to young parents and an

elevated risk of domestic abuse and intimate partner violence<sup>8 9 10 11</sup>.

The financial implications of these types of outcomes are highly difficult to quantify because they are long-term, vary widely between individuals, and often lack clear monetary values backed up by appropriate data.

- When examining impact assessments in both England and Wales and Scotland - both jurisdictions noted their expectation of non-monetised benefits<sup>12</sup> considerably exceeding the monetised costs<sup>13</sup>..
- This Review of Costs is not intended to provide an exhaustive list of potential public purse implications – in particular, those for the Department(s) which would be responsible for implementing the new legislation.

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<sup>8</sup> Batyra, E. and Pesando, L. M. (2021). “Trends in child marriage and new evidence on the selective impact of changes in age-at-marriage laws on early marriage”, *SSM – Population Health*, 14: 100811. Available [here](#).

<sup>9</sup> Parsons, J., Edmeades, J., Kes, A., Petroni, S., Sexton, M. and Wodon, Q. (2015). “Economic Impacts of Child Marriage: A Review of the Literature”, *The Review of Faith & International Affairs*, 13(3): 12-22. Available [here](#).

<sup>10</sup> Kidman, R. (2017). “Child marriage and intimate partner violence: a comparative study of 34 countries”, *International Journal of Epidemiology*, 46(2): 662-675. Available [here](#).

<sup>11</sup> Wodon, Q., Male, C., Nayihouba, A., Onagoruwa, A., Savadogo, A., Yedan, A., Edmeades, J., Kes, A., John, N., Murithi, L., Steinhaus, M. and Petroni, S. (2017). *Economic Impacts of Child Marriage: Global Synthesis Report*. The International Bank for Reconstruction and Development / The World Bank and The International Centre for Research on Women (ICRW), Washington. Available [here](#).

<sup>12</sup> Non-monetised benefits are positive outcomes which are understood but not assigned a monetary value.

<sup>13</sup> Monetised costs are costs for which it has been possible to assign a monetary value.

## Introduction

This Review of Costs aims to support Northern Ireland Assembly Members in their plenary, committee and constituency capacities, when scrutinising key potential implications that could arise for the “public purse” from the Marriage and Civil Partnership Bill<sup>14</sup> (the Bill); introduced by the Minister of Finance into the Northern Ireland Assembly on 16 March 2026<sup>15</sup>. The Bill comprises three Parts, containing a total of thirteen clauses and one Schedule. Its two primary purposes are: (1) to place non-religious belief marriages (including humanist marriages) on the same statutory footing as religious marriages under the Marriage (Northern Ireland) Order 2003<sup>16</sup>; and (2) to raise the minimum age for marriage and civil partnerships from 16 to 18<sup>17</sup>. The introduced Bill, if enacted, would formalise temporary arrangements that have enabled belief marriages to be solemnised under the oversight of the Registrar General, as introduced by the then Finance Minister in 2020<sup>18</sup>, following on from the 2017 *Smyth* judgement: this existing de facto system has solemnised more than 2,600 belief marriages since 2020<sup>19</sup>.

This Review of Costs focuses on key identifiable direct and indirect public expenditure impacts of the Bill, if enacted as introduced. For wider social or policy considerations, refer to RaISe Briefing Paper NIAR-84-2026, dated 1 June 2026. Initially, the Review provides background information, defining terminology and providing a brief overview of the Northern Ireland public finance context. Thereafter, it compares cost assessments compiled for equivalent legislation in two other jurisdictions - namely, England and Wales<sup>20</sup> and

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<sup>14</sup> Full text of the Marriage and Civil Partnership Bill – NIA Bill 30/22-27 – as introduced to the Northern Ireland Assembly is available [here](#).

<sup>15</sup> The Official Report of the First Stage is available [here](#).

<sup>16</sup> The Marriage (Northern Ireland) Order 2003, which was enacted to simplify marriage procedures, and which introduced a new system for marriage registration and officiation, is available [here](#).

<sup>17</sup> [Section 3.1](#) of this Review of Costs outlines the introduced Bill’s core objectives and RaISe Briefing Paper NIAR-84-2026 (dated 29 May 2026) provides further clause-by-clause policy analysis.

<sup>18</sup> Letter from the DoF to the Finance Committee, Annex A, paragraph 6, page 3.

<sup>19</sup> Letter from the DoF to the Finance Committee, Annex A, paragraph 7, page 3.

<sup>20</sup> The Marriage and Civil Partnership (Minimum Age) Act 2022 represents relevant legislation in the context of England and Wales. Available [here](#).

Scotland<sup>21</sup>, to highlight key considerations about the introduced Bill's potential impact on the "public purse" in Northern Ireland, followed by key takeaways.

As such, it is presented using the following section headings:

1. [Public finance context](#)
2. [Comparative evidence from other jurisdictions](#)
3. [Potential financial implications for the public purse](#)
4. [Key takeaways](#)

Any discussion regarding the prevailing law, including existing legislation, is not intended to provide legal advice or opinion. Instead, it seeks to orientate the Paper's discussion. Identified key potential financial implications for the public purse are not intended to provide an exhaustive list.

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<sup>21</sup> The Marriage (Scotland) Act 1977 represents relevant legislation in the context of Scotland. Available [here](#).

# 1 Public finance context

To provide wider framing for this Review of Costs, this section sets out key definitions and the challenging public finance context in which the Bill has been introduced.

## 1.1 “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<sup>22</sup>.

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 Marriage and Civil Partnership Bill would be met by departmental spending – that is, either within the DoF’s existing departmental budget or through reprioritisation within the Executive’s overall spending envelope.

## 1.2 Ongoing Budgetary Challenges Across the United Kingdom

It remains a challenging period for public finances at both the central and devolved levels across the United Kingdom. That is due to a wide range of contributing factors, which this Paper does not discuss in detail. Of note for purposes of this Review of Costs are those key developments highlighted below

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<sup>22</sup> The standards expected of Accounting Officer’s organisations are outlined in Box 3.1 (page 25) of *Managing Public Money*, published by HM Treasury in June 2025, which is available [here](#). The Accounting Officer, acting within the authority of the Minister(s) to whom they are responsible, must ensure the organisation meets the standards set out in the Managing Public Money policy.

in the **Figure 1** timeline of key developments across the period February 2024 up to the time of writing this Paper.

### **Figure 1: A Challenging Period for Public Finances: Timeline of Key Developments from February 2024 – Present**

February 2024 -  
Present

#### **Implementation of Political Agreements**

- 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 the Interim Transformation Board (March 2025). These measures have been broadly targeted to improve the position of Northern Ireland's public finances, whilst seeking to balance numerous competing priorities and demands for limited available funding.

August-September  
2024

#### **Budget Information Gathering Exercise**

- 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 2025/25 Northern Ireland Executive Budget cycle. The DoF outlined that "Departments identified a reported £767 million of unfunded pressures", as reported to the Assembly on 23 September 2024.

October 2024

#### **Chancellor's Autumn Budget 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".

December 2024

#### **Departmental Bids Exceed Budget Allocation**

- Northern Ireland Departmental resource and capital expenditure bids 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 Finance Minister highlighted ongoing "pay and inflationary pressures" and "growing demands" on public services.

March 2025

## Chancellor's Spring Statement 2025

- The Chancellor's 2025 Spring Statement announced a number of policy decisions, which included reforms to the welfare system, increased defence spending and a £3.25 billion "Transformation Fund" to reform public services. (Note: this is a central government development - the Northern Ireland Executive Budget is a sub-cycle within the United Kingdom Government's Budget cycle.)

3 April 2025

## Executive Agrees 2025/26 Budget

- The Executive agreed the 2025/26 Executive Budget, which the Finance Minister described as "setting out a direction of travel" which "clearly prioritises its Programme for Government priorities".

4 April 2025

## US Trade Tariffs

- 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.

8 May 2025

## US-UK Trade Deal

- A non-binding trade deal was agreed by the US and UK Governments, with the general terms subsequently published in the UK-US Economic Prosperity Deal (EPD); the deal is non-binding, meaning further negotiations are required to work through the detail of the deal.

24 June 2025

## Executive Spending Plans Published

- 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.

3 October 2025

## Finance Minister Written Ministerial Statement

- The Finance Minister provided a Written Ministerial Statement detailing Treasury Funding Available 2026-2029/30.

26 November 2025

## Chancellor's Autumn Budget 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.

6 January 2026

## Finance Minister Publishes Draft Multi-Year Budget

- The Finance Minister published the Draft Budget 2026-2029/30 (not agreed by the Executive) and announced an eight-week public consultation on the draft. The Finance Minister, in a Written Ministerial Statement to the Assembly, outlined that:

*"...both the Resource and Capital DEL funding position remain extremely constrained."*

The Finance Minister continued:

- *"Delivering our Programme for Government priorities will require the Executive collectively, and individual Ministers, to take challenging decisions to prioritise the available funding to deliver the desired outcomes."*

11 February 2026

## Treasury Agrees £400m Reserve Claim

- HM Treasury agreed a reserve claim for the Northern Ireland Executive, to provide £400 million for 2025/26, which is to be repaid over three years. The Finance Minister confirmed in a Written Statement on the same day that the Reserve Claim would be allocated as follows, as agreed by the Executive:

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

3 March 2026

## Chancellor's Spring Forecast 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.

16 April 2026

## Update on Discussions Towards a Multi-Year Budget

- 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."*

### 1.3 Draft Budget 2026-2029/30 – Department of Finance Allocations

The Finance Minister published a Written Ministerial Statement to the Assembly on 6 January 2026 on the Draft Budget 2026-29/30, outlining proposed DoF Resource Departmental Expenditure Limits (RDEL) and Capital Departmental Expenditure Limits (CDEL) funding allocations for the specified period, including the DoF's, as reproduced below in **Table 1**.

**Table 1: Proposed DoF Budget Outcome 2026-30 (£ millions)<sup>23</sup>**

Funding Category	2026-27	2027-28	2028-29	2029-30
DoF RDEL	284.6	306.2	302.2	N/A
DoF CDEL	40.0	38.0	30.3	30.3
<b>DoF Total</b>	<b>324.6</b>	<b>344.2</b>	<b>332.5</b>	30.3

Source: [Draft Budget 2026-29/30](#)

The consultation document also outlines previous Executive commitments for RDEL spending in the DoF, as reproduced below in **Table 2**.

**Table 2: DoF RDEL – Previous Executive Commitments (£ millions)<sup>24</sup>**

Executive Commitments	2026-27	2027-28	2028-29
Cyber Security	1.2	1.2	1.2
Rates Rebate	93.3	99.9	104.8
EU Match Funding	1.8	1.8	0.2

<sup>23</sup> As outlined in the Finance Minister's Draft Budget 2026-29/30 – the Written Ministerial Statement (6<sup>th</sup> January 2026) outlining Departmental allocations is available [here](#).

<sup>24</sup> As above.

Integr8	22.5	34.6	25.4
<b>DoF Total</b>	<b>118.8</b>	<b>137.6</b>	<b>131.6</b>

Source: [Draft Budget 2026-29/30](#)

The Draft Budget 2026-2029/30 remains unagreed by the Executive at the time of writing. During oral evidence to the Assembly Finance Committee on 18 February 2026, DoF officials explained the Department’s capital allocation, noting:

*... since the draft Budget was announced, significant work has been taken forward by the Department to work through how business areas could manage and re-profile their budgets in order to reduce requirements and enable the Department to live within the draft allocation<sup>25</sup>.*

And added with regard to DoF’s resource allocation:

*When it comes to resource, the pressures are much worse in the second and third years when compared with the first. We will need to make use of the first year to plan ahead for years 2 and 3 when we have the multi-year settlement.<sup>26</sup>*

Given the financial pressures facing Executive departments, a closer examination of the public purse costs that could arise from this introduced Bill is particularly relevant.

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<sup>25</sup> Northern Ireland Assembly Finance Committee proceedings, 18<sup>th</sup> February 2026, as recorded in Hansard and available [here](#).

<sup>26</sup> As above.

## 2 Comparative evidence from other jurisdictions

As noted earlier, the Bill's accompanying EFM<sup>27</sup> states:

*The Department does not consider that the Bill will place any financial burden on the **public purse**, nor the general public<sup>28</sup>... [and the Bill] will not have any adverse impact on business, charities or the voluntary sector<sup>29</sup>.*

No data, modelling or quantification accompanies those statements. Moreover, there is no assessment of potential savings.

Experience in other jurisdictions which have implemented comparable reforms provides useful context when considering key potential public purse implications of the introduced Bill. That experience is outlined here, as their analysis helps to inform the basis of the proportional costing estimates which follow in [Section 3](#) of this Paper.

### 2.1 England and Wales

The Marriage and Civil Partnership (Minimum Age) Act 2022<sup>30</sup> was a Private Member's Bill (PMB) that was enacted on 12 January 2022<sup>31</sup>. It raised the minimum age for marriage and civil partnership to 18 in England and Wales, removing the existing option of parental or judicial consent for 16- and 17-year-olds. It also expanded the existing criminal offence of forced marriage under section 121 of the Anti-Social Behaviour, Crime and Policing Act 2014<sup>32</sup>, making it an offence to arrange the marriage of any person under the age of 18 in all circumstances, even where no coercion is used<sup>33</sup>.

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<sup>27</sup> The Bill's accompanying EFM – NIA Bill 30/22-27 EFM – is available [here](#).

<sup>28</sup> NIA Bill 30/22-27 EFM, Financial Effects of the Bill, page 6. Available [here](#).

<sup>29</sup> NIA Bill 30/22-27 EFM, Summary of the Regulatory Impact Assessment, page 7. Available [here](#).

<sup>30</sup> The Marriage and Civil Partnership (Minimum Age) Act 2022 is available [here](#).

<sup>31</sup> Further details regarding the passage of the Bill into law is available [here](#).

<sup>32</sup> The Anti-Social Behaviour, Crime and Policing Act 2014 is available [here](#).

<sup>33</sup> Fairbairn, C., Barton, C. and Lipscombe, S. (2022). "Commons Library analysis of Marriage and Civil Partnership (Minimum Age) Bill 2021-22", *House of Commons Library Research Briefing*, CBP 09373, 22 February. Available [here](#).

### 2.1.1 Monetised costs

Two Impact Assessments (IAs) were prepared for this PMB<sup>34 35</sup>; led by the Ministry of Justice and Home Office, and they were largely consistent, with the final IA incorporating revised policing cost estimates that were not available at the earlier stage. The IAs covered a ten-year period beginning in 2022/23, applying a 3.5% discount rate to adjust the value of future costs and benefits to their present value, in line with His Majesty's (HM) Treasury Green Book methodology<sup>36 37</sup>.

The remainder of this sub-section focuses on **only the final IA**, as it represents the most recent and robust costing analysis for the English and Welsh legislation.

The final IA's headline financial position was a net cost to the public purse – that is, a total Net Present Social Value<sup>38</sup> (NPSV – quantifying how much a project is worth overall, reflecting expected benefits and costs, adjusted for time) of **-£3.0 million**. The negative figure arose because the benefits of the legislation – primarily the reduction in harms associated with child marriage – could not be monetised, while the costs could. As explained in the final IA, the standard approach to quantifying these kinds of benefits could not be "... sensibly monetise[d] ..." <sup>39</sup> for purposes of this Bill.

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<sup>34</sup> Ministry of Justice and Home Office (2021). "Marriage and Civil Partnership (Minimum Age) Bill Impact Assessment (IA)", MoJ017/2021, 15 November. Available [here](#).

<sup>35</sup> Ministry of Justice and Home Office (2022). "Marriage and Civil Partnership (Minimum Age) Bill Impact Assessment (IA)", MoJ017/2021, 28 April. Available [here](#).

<sup>36</sup> The HM Treasury Green Book and accompanying guidance is available [here](#).

<sup>37</sup> Ministry of Justice and Home Office (2022). "Marriage and Civil Partnership (Minimum Age) Bill Impact Assessment (IA)", MoJ017/2021, 28 April, paragraph 24, page 7. Available [here](#). The Net Present Value (NPV) was appraised over a ten-year period beginning in 2022/23 using a 3.5% discount rate, with a 100% optimism bias also applied to the GRO's system updated costs.

<sup>38</sup> NPSV measures the long-term economic, social and environmental consequences of a policy intervention, discounted to their current equivalent value. This is calculated by subtracting the real discounted social costs from the real discounted social benefits of a particular policy proposal. The negative number arises because the social benefits could not be monetised in this case – a further explanation is outlined in the HM Treasury Green Book [here](#).

<sup>39</sup> Ministry of Justice and Home Office (2022). "Marriage and Civil Partnership (Minimum Age) Bill Impact Assessment (IA)", MoJ017/2021, 28 April, Summary: Analysis & Evidence, page 7. Available [here](#).

However, the monetised costs identified in the final IA were grouped into six main categories, as presented in **Table 3** below.

**Table 3: Monetised costs identified in Marriage and Civil Partnership (Minimum Age) Act 2022 EFM<sup>40</sup>**

<b>General Register Office (GRO) – system and administrative updates</b>	The GRO’s computer systems and registration forms required updating to reflect the change in the minimum age from 16 to 18. The final IA estimated the total one-off cost at <b>£0.5 million</b> in 2022/23, noting that a 100% optimism bias <sup>41</sup> had been applied to reflect the high level of uncertainty in delivery costs.
<b>Government communications activity</b>	A one-off cost was identified for a communications campaign to raise public awareness of the change in the law, estimated at £0.35 million in 2022/23.
<b>HM Prisons and Probation Service (HMPPS) – prison capacity</b>	The expansion of the forced marriage offence was expected to generate modest additional prosecutions. The Final IA estimated <b>one additional prosecution per year</b> . Based on sentences handed down for previous forced marriage convictions, the average sentence was estimated at 3.9 years, meaning that four prison places would be occupied by convicted offenders at any given time. His Majesty’s Prisons and Probation Service (HMPPS) would consequently face a one-time capital cost of £1.0 million for the construction of four new prison places at £0.25 million per place, and ongoing annual costs of approximately £0.2 million per year in providing those places (using a cost of £47,297 per prisoner place at 2021/22 prices). After social discounting <sup>42</sup> , the average annual cost was presented as £0.1 million per year.

<sup>40</sup> The Marriage and Civil Partnership (Minimum Age) Act 2022 is available [here](#).

<sup>41</sup> Policy appraisers have a well-documented historical tendency to be over-optimistic when assessing costs and benefits – making optimism bias adjustments tries to mitigate this and is consistent with HM Treasury Green Book methodology. Further detail is available [here](#).

<sup>42</sup> The HM Treasury Green Book recommends using discounting to compare social costs and social benefits occurring over different time periods on a consistent basis.

<b>Police Forces in England and Wales – investigation costs</b>	<p>Using the cost of investigating a crime equivalent to “violence without injury” as a proxy (£1,378 per investigation at 2021/22 prices, including multipliers), and assuming a reporting rate of between 5% and 17% of relevant unregistered ceremonies to the police (central estimate 11%), the total annual police investigation cost for the new offense was estimated at between £2,300 and £31,400 per year (central estimate £11,400 at 2021/22 prices). Over a ten-year period, the total cost to policy ranged between £20,000 and £270,000 with a central estimate of £100,000<sup>43</sup>.</p>
<b>Other agency costs</b>	<p>Other relevant agencies collectively found to face the costs associated with the single estimated annual prosecution. The final IA described these as negligible, including provisions such as holding an additional court case, providing legal aid and prosecution costs.</p>
<b>GRO – lost registration fee income</b>	<p>As the Bill reduced the number of marriages eligible to be registered, potentially resulting in a small amount of income lost to the GRO from the registration fees of between £92 and £132 they would otherwise have received. Given that fewer than 150 such marriages took place in England and Wales in 2018, this income loss was described as minimal<sup>44</sup>.</p>
<b>Totals</b>	<p>Ultimately, the aggregate best estimate of the total transition (one-off) cost in the final IA was <b>£1.8 million</b>, and the average annual ongoing cost (excluding transition) was <b>£0.2 million</b>, yielding a total cost in present value terms of <b>£3.0 million</b>.</p>

**Source:** Compiled by RaISe-PFSU (May 2026), relying on Marriage and Civil Partnership (Minimum Age) Bill Impact Assessment (IA), 2022

<sup>43</sup> Ministry of Justice and Home Office (2022). “Marriage and Civil Partnership (Minimum Age) Bill Impact Assessment (IA)”, MoJ017/2021, 28 April, paragraph 36, page 10. Available [here](#).

<sup>44</sup> Ministry of Justice and Home Office (2022). “Marriage and Civil Partnership (Minimum Age) Bill Impact Assessment (IA)”, MoJ017/2021, 28 April, paragraph 40, page 10. Available [here](#).

### 2.1.2 Non-monetised costs

The final IA identified several costs that could not be quantified. Those included the costs to 16- and 17-year-olds who would delay their marriage, and the loss in revenue for premises who would otherwise host these marriages which are no longer taking place. These costs were assessed to be small.

### 2.1.3 Non-monetised benefits

The final IA identified a range of benefits that were expected to flow from the legislation, but which could not be monetarily quantified. Child marriage is associated with leaving education early, limited career and vocational opportunities, serious physical and mental health problems, developmental difficulties for the children born to young mothers, and an increased risk of domestic abuse<sup>45 46 47 48</sup>. A reduction in child marriages would mitigate the negative economic impacts of these social outcomes. As a result, the public purse would come under less pressure from supporting individuals experiencing adverse social outcomes from child marriages. The overall impact of that would be expected to be minimal, given the small number of cases involved.

## 2.2 Scotland

The current minimum age for marriage and civil partnership in Scotland is 16, with no requirement for parental consent under the Marriage (Scotland) Act 1977<sup>49</sup>. In addition, Scotland formally codified non-religious belief marriage

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<sup>45</sup> Batyra, E. and Pesando, L. M. (2021). "Trends in child marriage and new evidence on the selective impact of changes in age-at-marriage laws on early marriage", *SSM – Population Health*, 14: 100811. Available [here](#).

<sup>46</sup> Parsons, J., Edmeades, J., Kes, A., Petroni, S., Sexton, M. and Wodon, Q. (2015). "Economic Impacts of Child Marriage: A Review of the Literature", *The Review of Faith & International Affairs*, 13(3): 12-22. Available [here](#).

<sup>47</sup> Kidman, R. (2017). "Child marriage and intimate partner violence: a comparative study of 34 countries", *International Journal of Epidemiology*, 46(2): 662-675. Available [here](#).

<sup>48</sup> Wodon, Q., Male, C., Nayihouba, A., Onagoruwa, A., Savadogo, A., Yedan, A., Edmeades, J., Kes, A., John, N., Murithi, L., Steinhaus, M. and Petroni, S. (2017). *Economic Impacts of Child Marriage: Global Synthesis Report*. The International Bank for Reconstruction and Development / The World Bank and The International Centre for Research on Women (ICRW), Washington. Available [here](#).

<sup>49</sup> The Marriage (Scotland) Act 1977 is available [here](#).

when enacting the Marriage and Civil Partnership (Scotland) Act 2014<sup>50</sup>. Part 1 of the introduced Bill currently considered in Northern Ireland is modelled on Scotland's 2014 Act. The Scottish Financial Memorandum that accompanied the proposed legislation noted no expected costs to arise from the Bill provisions empowering belief celebrants and bodies<sup>51</sup>, stating that many celebrants (such as humanists) already conducted opposite sex marriage under the Marriage (Scotland) 1977 Act. Scotland therefore is akin to Northern Ireland with respect to non-religious belief marriages having been in operation prior to legislation codifying their provision. In December 2025, the Scottish Government launched a public consultation on proposed family law reforms; considering, for example, whether to raise the currently specified minimum marriage and civil partnership age from 16 to 18 years, and whether to extend the existing proscribed forced marriage offence to include non-coercive conduct intended to cause a person under 18 to marry. That consultation closed on 21 April 2026<sup>52</sup> and its findings are awaited. The Scottish Government assessed that introducing qualifying requirements would generate minimal costs across all affected parties (for belief marriages).

### 2.2.1 Monetised costs

To support that consultation, the Scottish Government produced a draft assessment document comprising several IAs. Most notable in this context were the partial Business and Regulatory Impact Assessments (BRIAs), which "...consider[ed] the potential costs and benefits..."<sup>53</sup> from proposed options. These represent the direct equivalent of the early and final IAs in England and Wales.

The Scottish partial BRIAs considered the costs associated with raising the minimum age only (Option 2), raising the minimum age alongside extending the

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<sup>50</sup> The Marriage and Civil Partnership (Scotland) Act 2014 is available [here](#).

<sup>51</sup> The Explanatory Notes Accompanying the Marriage and Civil Partnership (Scotland) Act 2014 are available on the National Records of Scotland website [here](#).

<sup>52</sup> Further details regarding the consultation are available on the Scottish Government website, [here](#).

<sup>53</sup> Scottish Government (2025). *A Scottish Government Consultation on Family Law*, Potential reform of minimum age and civil partnership – partial Business and Regulatory Impact Assessment, pages 28 and 77 respectively, December. Available [here](#).

forced marriage offence (Option 1), and taking no policy action (Option 3). No preferred option was identified pending consultation responses. The BRIA explicitly stated it would be updated once a decision on next steps was taken<sup>54</sup>.

Nonetheless, the overall financial conclusion of the partial BRIA was directly consistent with the approach taken in the England and Wales IAs and indeed, with the Northern Ireland Bill's EFM; finding **costs were expected to be low**.

The BRIA further states that costs under Option 1 “would mainly be for the public sector” and that “these costs are expected to be low”, with no significant increase in investigations or prosecutions anticipated from the extended force marriage offence, whose primary effect is expected to be deterrence rather than prosecution<sup>55</sup>.

However, the partial BRIA did provide specific cost estimates for several items, which allowed for detailed analytical financial assessment, albeit only partial. That assessment identified monetised costs across nine categories, as presented in **Table 4** below.

**Table 4: Monetised costs identified in partial BRIA (Scotland)<sup>56</sup>**

<p><b>National Records of Scotland (NRS)</b> – IT and administrative updates</p>	<p>The BRIA stated that there would be “a one-off cost of £100,000 covering costs to NRS”<sup>57</sup>. This compares with the £0.5m GRO system update cost in England and Wales – a difference consistent with the smaller scale of operations and the absence of the 100% optimism bias applied in that jurisdiction.</p>
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<sup>54</sup> As above.

<sup>55</sup> Scottish Government (2025). *A Scottish Government Consultation on Family Law*, Potential reform of minimum age and civil partnership – partial Business and Regulatory Impact Assessment, page 28, December. Available [here](#).

<sup>56</sup> Scottish Government (2025). *A Scottish Government Consultation on Family Law*, Potential reform of minimum age and civil partnership – partial Business and Regulatory Impact Assessment. Available [here](#).

<sup>57</sup> As above.

<p><b>Registration fee income – NRS and local authorities</b></p>	<p>A small reduction in registration fee income was identified. The registration fee is currently £45 for each marriage notice submitted. Given that only 21 marriages involving under-18s were registered in Scotland in 2023, the income loss from fewer notice submissions would be minimal. Any loss of fee income may also represent a deferral rather than a permanent loss if couples delay rather than abandon their plans to marry<sup>58</sup>.</p>
<p><b>Scottish Government – communications activity</b></p>	<p>There would be one-off implementation costs for communications to raise awareness of changes in the law. Notably, the BRIA took a more optimistic view of communications costs than the England and Wales IAs, stating that awareness raising “could be absorbed by existing Scottish Government resources and communications channels, including social media, and updating the available information on mygov.scot”<sup>59</sup>. This contrasts with the £0.35m communications campaign costed in England and Wales and suggests that the equivalent Northern Ireland cost may also be absorbable within existing DoF resources. The Committee may wish to explore this point with the Department – potential <b>Scrutiny Point 4</b>, in <a href="#">Section 3</a> of this Paper, lays this out further.</p>
<p><b>Police Scotland – training and familiarisation</b></p>	<p>Under Option 1, the BRIA identified one-off costs for justice agencies in terms of training or familiarisation. The BRIA provided a specific figure: “one-off costs of £100,000 to each of Police Scotland and COPFS [Crown Office and Procurator Fiscal Service]</p>

<sup>58</sup> As above.

<sup>59</sup> Scottish Government (2025). *A Scottish Government Consultation on Family Law, Stage 3: Costs, impacts and benefits, Potential costs or impacts for others, Costs of Option1 (bring forward full legislation)*, page 34, December. Available [here](#).

	should cover this <sup>60</sup> – giving a combined one-off justice training cost of £200,000.
<b>Crown Office and Procurator Fiscal Service (COPFS) – prosecution costs</b>	The BRIA provided specific unit cost data for prosecution. For 2023–24, solemn prosecutions <sup>61</sup> in the sheriff court was estimated to cost the COPFS an average of £6,669 to prosecute, compared with an average of £956 for summary procedure <sup>62</sup> in the sheriff court or justice of the peace court <sup>63</sup> . These figures are useful comparators when estimating equivalent prosecution costs in Northern Ireland.
<b>Scottish Courts and Tribunals Service (SCTS)</b>	In 2023, average court costs for solemn sheriff court procedures were calculated at £2,582, compared with £507 for a summary procedure <sup>64</sup> .
<b>Scottish Legal Aid Board (SLAB)</b>	Average costs of legal aid where the defendant is eligible have been calculated at £1,912 for a sheriff court solemn procedure and £712 for summary proceedings <sup>65</sup> .

<sup>60</sup> Scottish Government (2025). *A Scottish Government Consultation on Family Law, Stage 3: Costs, impacts and benefits, Potential costs or impacts for others, Costs of Option1 (bring forward full legislation)*, page 35, December. Available [here](#).

<sup>61</sup> Court proceedings in Scotland for criminal offences that are considered serious. Juries are used in these cases.

<sup>62</sup> Court proceedings in Scotland for criminal offences which are considered less serious. Juries are not used in these cases.

<sup>63</sup> Scottish Government (2025). *A Scottish Government Consultation on Family Law, Stage 3: Costs, impacts and benefits, Potential costs or impacts for others, Costs of Option1 (bring forward full legislation)*, page 36, December. Available [here](#).

<sup>64</sup> As above.

<sup>65</sup> As above.

<b>Scottish Prison Service (SPS) – prison capacity</b>	If those convicted under an extended forced marriage offence received custodial sentences, the SPS would incur costs. Audit Scotland's 2022/23 Report on the SPS <sup>66</sup> is cited: the annual average cost per prisoner place had increased to £44,62067. This compares with the England and Wales figure of £47,297 per prisoner place used in those IAs – a similar order of magnitude, as would be expected. Importantly, however, the BRIA did not estimate a volume of expected prosecutions or calculate an aggregate prison cost.
<b>Wedding sector businesses</b>	The BRIA estimated that any impact on wedding sector businesses would be minimal. Given that only around 21 marriages per year involved under-18s in 2023, and many couples might simply delay rather than cancel, the BRIA concluded that any reduction in business income “is not likely to be discernible to individual businesses” <sup>68</sup> .
<b>Totals</b>	Ultimately, the aggregate best estimate of the total transition (one-off) cost in the partial BRIA was <b>£300K</b> , with the average annual ongoing cost expressed primarily in a per-case context.

**Source:** Compiled by RaiSe-PFSU (May 2026), relying on Scottish Government Consultation on Family Law, 2025.

<sup>66</sup> Auditor General for Scotland (2023). *The 2022/23 audit of the Scottish Prison Service*, December. Available [here](#).

<sup>67</sup> Scottish Government (2025). *A Scottish Government Consultation on Family Law, Stage 3: Costs, impacts and benefits, Potential costs or impacts for others, Costs of Option1 (bring forward full legislation)*, page 36, December. Available [here](#).

<sup>68</sup> Scottish Government (2025). *A Scottish Government Consultation on Family Law, Stage 3: Costs, impacts and benefits, Potential costs or impacts for others, Costs of Option1 (bring forward full legislation)*, page 34, December. Available [here](#).

## 2.3 Republic of Ireland

The Republic of Ireland raised the minimum age of marriage to 18 with effect from 01 January 2019 through the Domestic Violence Act 2018<sup>69</sup>. The minimum age reform was only one of several significant measures in the Act. The Act was accompanied by an EFM which included only a brief financial analysis, stating:

*...There are no significant financial implications for the Exchequer arising from this Bill...*<sup>70</sup>

With regard to the provision of belief marriages under Irish law, there are three types of marriage which are all equally legally recognised: civil, religious and secular. Legal secular (belief/non-religious) marriages were introduced by the Civil Registration (Amendment) Act 2012. Again, in this case there were no detailed costings prepared at the time of the amendment's enactment. The two-page EFM for the Bill<sup>71</sup> stated:

*Additional costs to the Exchequer will be for administration in relation to the processing of new applications. It is not expected that a high volume of applicants will be made and any costs that arise will not be significant.*

Given the highly limited nature of cost assessments for similar legislation in the Republic of Ireland, there is little scope to conduct further detailed comparative cost assessments relating to the introduced Bill in Northern Ireland. The analysis hereafter will therefore focus primarily on cost assessments in England and Wales, as well as Scotland.

## 3 Potential financial implications on the public purse

This section provides indicative approximations, relying on the data and analysis outlined in Section 2 of this Paper. Note, **it does not provide formal**

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<sup>69</sup> The Domestic Violence Act 2018 is available [here](#).

<sup>70</sup> Department of Justice and Equality (2017). *Domestic Violence Bill 2017, Explanatory and Financial Memorandum (EFM)*, page 7. Available [here](#).

<sup>71</sup> Oireachtas data archive (2012) *Civil Registration (Amendment) Bill, Explanatory and Financial Memorandum (EFM)*, page 2. Available [here](#).

**cost estimates.** Instead, they are intended to facilitate Assembly scrutiny - including that of the Committee for Finance - of the potential costs arising from the Bill if enacted as introduced, for the relevant public bodies. They also help to highlight areas in which further DoF information could be sought.

Before presenting the indicative proportional cost estimates (not formal cost estimates), **Table 5** below summarises key cost-related implications from the comparative analysis for England and Wales and Scotland, as outlined earlier, informing the discussion about potential public purse considerations that follows.

**Table 5: Key implications arising from assessment of comparable jurisdictions**

Issue	England and Wales – Context	Scotland - Context	Implications for Northern Ireland
<b>Belief Marriage Provisions</b>	The Marriage and Civil Partnership (Minimum Age) Act 2022 – did not address belief marriages, which are not currently legally binding in England and Wales. Nevertheless, it remains an appropriate comparator because the costs associated with belief marriage provisions within the proposed Bill are expected to be	The relevant partial BRIA under consideration in Scotland does not deal with belief marriage. Belief marriages already have equal statutory footing in Scotland as religious marriages under the Marriage and Civil Partnership (Scotland) Act 2014. In any case, these provisions were not expected to add additional costs in	Given that the proposed Bill seeks to formalise temporary arrangements, as well as the evidence from Scotland, this aspect of the proposed Bill, if enacted, would not add material costs.

	minimal, therefore having a small impact on overall indicative estimates.	Scotland at the time of passing.	
<b>Scale of Population</b>	England and Wales have a population of c.62 million, approximately 31 times larger than Northern Ireland.	Scotland has a population of c.5.5 million, approximately 3 times larger than Northern Ireland.	Northern Ireland has a population of c.1.9 million, smaller than Scotland and significantly smaller than England and Wales. The equivalent costs in Northern Ireland would therefore be substantially lower in absolute terms, though the structure of the costs (GRO system updates, communications, criminal justice) would be broadly similar.
<b>Affected Marriages</b>	The number of under-18 marriages in England and Wales prior to the enacted	The number of under-18 marriages in Scotland in 2023 (most recent year available) was 21. <sup>74</sup>	In Northern Ireland, the DoF consultation document regarding the Bill proposals stated there were approximately 25–59 per year in Northern Ireland <sup>1</sup> .

<sup>74</sup> Scottish Government (2025). *A Scottish Government Consultation on Family Law*, Potential reform of minimum age and civil partnership – partial Business and Regulatory Impact Assessment. Available [here](#).

	Bill was approximately 134–147 per year <sup>72 73</sup> .		
<b>Additional Topics</b>	<b>Summary</b>		
<b>Institutional Context</b>	The cost categories identified in both the England and Wales and Scotland cost assessments map strongly onto equivalent institutions in Northern Ireland, albeit at a smaller scale given the difference in population and the number of affected marriages that would be affected.		
<b>Further Considerations</b>	<p>The England and Wales final IA gave significant attention to the financial implications of unregistered ceremonies. The Bill’s accompanying EFM in Northern Ireland did not address that dimension. This is reflected in Potential <b>Scrutiny Point 2</b> in Section 3 of this Paper.</p> <p>The Scottish BRIA is explicitly partial and unfinished – the sign-off section remains blank, with the Minister’s signature and date outstanding pending the consultation outcome<sup>1</sup>. This should be noted when relying on the Scottish experience.</p>		

**Source:** Compiled by RaISe-PFSU (May 2026), relying on Marriage and Civil Partnership (Minimum Age) Bill Impact Assessment (IA), 2022, & Scottish Government Consultation on Family Law, 2025.

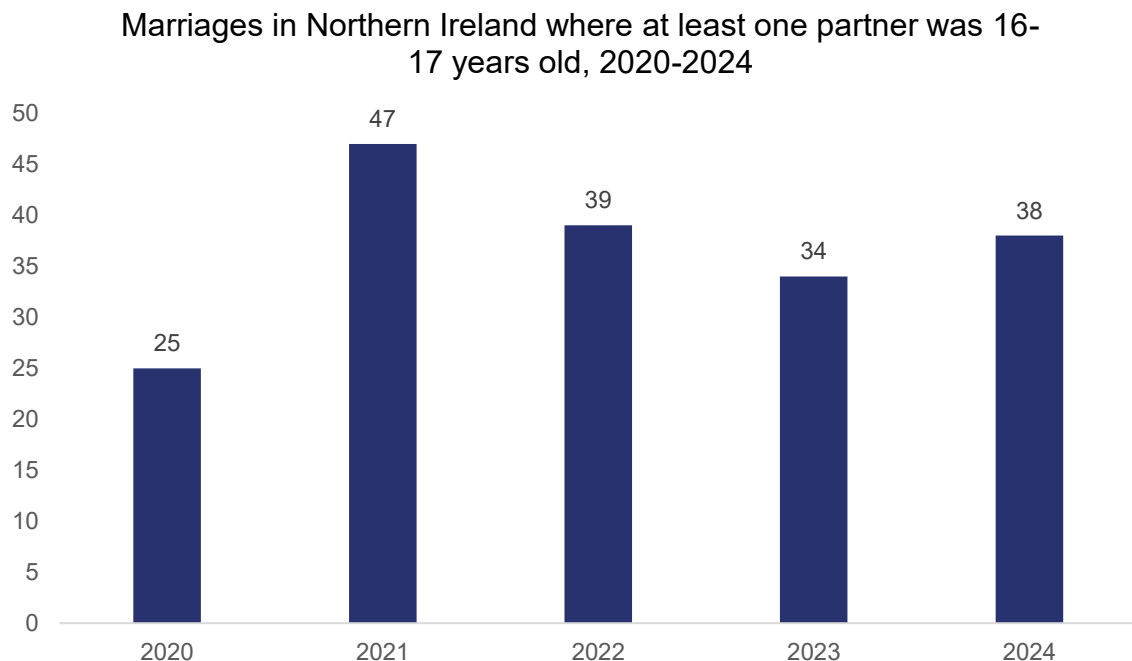
When scrutinising the introduced Bill, it is also useful to establish the current scale of marriages in Northern Ireland involving under-18 partners, as that directly informs several of the cost categories provided in Tables 6 and 7 below – most notably in relation to the GRONI registration fee income and the Clause 6 policing cost discussion.

<sup>72</sup> Ministry of Justice and Home Office (2021). “Marriage and Civil Partnership (Minimum Age) Bill Impact Assessment (IA)”, MoJ017/2021, 15 November. Available [here](#).

<sup>73</sup> Fairbairn, C., Barton, C. and Lipscombe, S. (2022). “Commons Library analysis of Marriage and Civil Partnership (Minimum Age) Bill 2021-22”, *House of Commons Library Research Briefing*, CBP 09373, 22 February. Available [here](#).

As such, Figure 2 below presents GRONI data on the number of marriages registered in Northern Ireland each year where at least one partner was aged under 18, from 2020 to 2024.

**Figure 2: Marriages in Northern Ireland where at least one partner was aged under 18, 2020-2024<sup>75</sup>**



**Source:** GRONI, April 2026

Note: GRONI confirmed there have been no civil partnerships in Northern Ireland involving an under-18 partner in this period. The 2020 figure reflects reduced marriage volumes associated with COVID-19 restrictions.

The data confirm the number of marriages per year involving at least one under-18 partner in Northern Ireland has ranged from 25 to 47 per year over the period shown, with an average of approximately 37 per year across 2021-2024 once the COVID-affected 2020 figure is set aside. That is broadly consistent with the range of 25-59 per year cited in the DoF consultation analysis<sup>76</sup>.

<sup>75</sup> These figures were provided to RaISe by GRONI via email on 20<sup>th</sup> April 2026. Whilst partial data was provided for 2025, this has not been included in Figure 2 due to a lack of full-year coverage.

<sup>76</sup> Department of Finance, "Marriage Law Consultation: Results and Analysis", available [here](#).

GRONI also provided partial 2025 data (13 marriages across Q1-Q3), which do not suggest any notable divergence from the recent trends, though a full-year figure is not yet available. These noted volumes are small in absolute terms – and, indeed, as a proportion of total marriages in Northern Ireland, as can be seen in Table 6 below – and directly inform public purse implications of the Bill for GRONI fee income, and for criminal justice agencies in connection with the Clause 6 offence - both expected to be low.

**Table 6: Proportion of total marriages in Northern Ireland with at least one partner under 18, 2020-2024<sup>77</sup>**

	2020	2021	2022	2023	2024
Total number of marriages	3,724	7,921	8,564	7,494	7,251
Number of marriages with at least one partner under 18	25	47	39	34	38
Proportion of total marriages with at least one partner under 18	<b>0.67%</b>	<b>0.59%</b>	<b>0.46%</b>	<b>0.45%</b>	<b>0.52%</b>

**Source:** NISRA, 2026

Notes: Figures for 2025 are not included as data with regards to the number of marriages with at least one partner under 18 only contains figures for Q1 to Q3.

### 3.1 Indicative Population-Adjusted Costings

The following mid-2024 population estimates are used as the basis for scaling:

- Office of National Statistics (ONS) mid-2024 estimate for England and Wales of 61,806,682<sup>78</sup>.
- National Records of Scotland (NRS) mid-2024 estimate for Scotland of 5,546,900<sup>79</sup>.

<sup>77</sup> Generated by RaISe using NISRA marriage data and GRONI data – also supplied by NISRA – and provided to RaISe via email, April 2026.

<sup>78</sup> ONS (2025). “Population estimates for England and Wales: mid-2024”, 30 July. Available [here](#).

<sup>79</sup> NRS (2025). “Mid-2024 population estimates”, 14 August. Available [here](#).

- Northern Ireland Statistics and Research Agency (NISRA) mid-2024 estimate for Northern Ireland of 1,927,900<sup>80</sup>.

As such, these population estimates yield two relative population figures:

- **England and Wales to Northern Ireland** – Northern Ireland’s population represents approximately 3.12% of that of England and Wales, equivalent to a scaling factor of approximately 32.1.
- **Scotland to Northern Ireland** – Northern Ireland’s population represents approximately 34.8% of Scotland’s, equivalent to a scaling factor of approximately 2.9.

Three methodological caveats should be noted before the indicative estimates are considered:

- **Fixed versus variable costs:** Some cost components – principally IT system updates and one-off staff training – contain fixed elements that do not reduce proportionally with population size. A system update to reflect a change in the minimum age to 18 would not cost proportionally less simply because a jurisdiction is smaller. For such items, the proportional scaling from England and Wales is likely to understate the true Northern Ireland cost, and, as such, the Scotland-derived figure generally provides a more informative reference point.
- **Prosecution volume and criminal justice costs:** The England and Wales IA’s estimates of criminal justice costs are based on one additional prosecution per year for a jurisdiction of approximately 62 million people. Given Northern Ireland’s population (approximately 1/32 of England and Wales), simple proportional scaling implies approximately 0.031 prosecutions would occur per year – equivalent to roughly one prosecution every 32 years. That would not mean criminal justice costs are zero; they would not accrue evenly year-on-year, but instead would materialise if and when prosecutions would occur. In this context, the Scottish unit cost data for prosecution, courts, and legal aid – which

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<sup>80</sup> NISRA (2025). “2024 Mid-Year Population Estimates for Northern Ireland”, 11 September. Available [here](#).

would provide per-case estimates rather than aggregated totals – and is particularly useful when comparing with Northern Ireland.

- **Per-capita marriage rates:** On a per-capita basis, Northern Ireland's rate of under-18 marriages is approximately 5 -14 times higher than England and Wales, meaning costs linked to marriage volumes – including those associated with the new Clause 6 offence – could proportionally exceed the population-scaled England and Wales figures. That, however, must be read alongside the displacement effect of couples travelling from the Republic of Ireland to marry in Northern Ireland specifically because of the lower minimum age. This indicates that the effective volume of Northern Ireland-resident under-18 marriages would fall following commencement of the Bill if enacted. The net effect on criminal justice costs therefore would be uncertain in direction, but would be unlikely to be material.

### 3.2 Part 1: Belief marriage provisions

The public purse implications of Part 1 of the introduced Bill – placing non-religious belief marriages on the same statutory footing as religious marriages – are unsuitable for the same proportional (population-adjusted) scaling as the minimum age provisions. That is because neither of the IAs in England and Wales, nor the minimum age BRIA in Scotland, address belief marriage costs. Instead, the directly relevant comparator is the separate qualifying requirements partial BRIA, published alongside the Scottish Government's family law consultation, which considered the proposed introduction of qualifying requirements for religious and belief bodies in Scotland – directly equivalent to the powers in Clauses 1(2)(d) and 4(9) of the introduced Bill in Northern Ireland.

That BRIA concluded that introducing qualifying requirements would generate **minimal costs across all affected parties**, including religious and belief bodies, NRS staff and the Registrar General, the Scottish Government and civil

registrars<sup>81</sup>. That is reinforced by the operational record in Scotland, where the equivalent power under the Marriage and Civil Partnership (Scotland) Act 2014 has not been exercised in the eleven years since enactment, indicating that the power has functioned primarily as a deterrent and regulatory backstop, rather than as an active cost-generating mechanism.

In Northern Ireland, temporary arrangements enabling belief marriages have been in operation since 2017, with over 2,600 belief marriages conducted since 2020<sup>82</sup>. The Bill therefore would formalise what in practice is already an established operational arrangement, rather than create a new administrative infrastructure from scratch. GRONI's capacity for oversight of these ceremonies already has been deployed under those temporary arrangements, and the additional cost of placing that arrangement on a permanent statutory footing therefore could be **reasonably expected to be minimal**.

If the Bill would be enacted as introduced, the one contingent cost category under Part 1 concerns the exercise of the qualifying requirements and related powers in Clauses 1(2)(d) and 4(9) that would be implemented through a future Statutory Rule (regulations), which would be subject to affirmative procedure<sup>83</sup>.

### 3.3 Part 2: Minimum age provisions – indicative cost estimates

Tables 6 and 7 below present published costs estimated for England and Wales, and Scotland, alongside the corresponding indicative Northern Ireland proportional estimates. Table 6 addresses one-off transition costs; Table 7 addresses ongoing annual costs. The relevant Northern Ireland public body is identified in each case. Where a Scottish estimate is available, both scaling calculations are presented. Where it is not, the England and Wales scaling is presented alone as the basis for the Northern Ireland indicative figure.

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<sup>81</sup> Scottish Government (2025). *A Scottish Government Consultation on Family Law, Potential introduction of Qualifying Requirements for Religious and Belief bodies with celebrant who solemnise marriages and register civil partnerships – partial Business and Regulatory Impact Assessment, Stage 3: Costs, impacts and benefits, Other impacts*, page 83, December. Available [here](#).

<sup>82</sup> Letter from the DoF to the Finance Committee, Annex A, paragraph 7, page 3.

<sup>83</sup> Marriage and Civil Partnership Bill: Explanatory and Financial Memorandum, NIA Bill 30/22-27 EFM. Available [here](#).

**Table 6: Indicative one-off transition costs – minimum age provisions<sup>84</sup>**

Cost category	Relevant Northern Ireland body	England and Wales (E&W) estimate	Northern Ireland indicative (scaled from E&W)	Scottish estimate	Northern Ireland indicative (scaled from Scotland)	Northern Ireland indicative range
Registration system and administrative update	GRONI	£500,000 <sup>85</sup>	c.£16,000 <sup>86</sup>	£100,000	c.£35,000	c.£16,000 to £35,000 <sup>87</sup>
Government communications campaign	DoF	£350,000	c.£11,000	Absorbable within existing resources	c.£0	c.£0 to £11,000 <sup>88</sup>
Police training and familiarisation	PSNI	Not separately quantified	-	£100,000	c.£35,000	c.35,000 <sup>89</sup>
Prosecution service training	PPS	Not separately quantified	-	£100,000	c.£35,000	c.£35,000

<sup>84</sup> RalSe internal calculations applying population-adjusted proportional scaling from *A Scottish Government Consultation on Family Law, Stage 3: Costs, impacts and benefits* (available [here](#)), and Ministry of Justice and Home Office (2022). “Marriage and Civil Partnership (Minimum Age) Bill Impact Assessment (IA)”, MoJ017/2021, 28 April (available [here](#)).

<sup>85</sup> The England and Wales GRO figure includes a 100% optimism bias applied to reflect uncertainty in IT delivery costs. The underlying base estimate before bias adjustment is £250,000, which scales to approximately £8,000 on a Northern Ireland basis.

<sup>86</sup> Derived from: £500,000 × (1,927,900 ÷ 61,806,682).

<sup>87</sup> Fixed-cost components mean the actual Northern Ireland figure is likely to sit at or above the upper end of this range. The Scotland-scaled figure (£35,000) is likely to be the more informative reference point for a predominantly fixed-cost item of this kind.

<sup>88</sup> The Scottish BRIA assessed communication activity as absorbable within existing Scottish Government resources and communications channels. Equivalent absorption within existing DoF communications resources may be achievable for Northern Ireland.

<sup>89</sup> Scotland provided estimates of £100,000 each for Police Scotland and the Crown Office and Procurator Fiscal Service (COPFS) to cover one-off training and familiarisation costs. The Northern Ireland estimates for PSNI and PPS are derived by scaling those figures to Northern Ireland’s population relative to that of Scotland.

Prison capacity (new places)	NIPS	£1,000,000 <sup>90</sup>	c.£31,000	Not quantified	-	Effectively £0 <sup>91</sup>
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**Source:** Compiled by RaISe-PFSU, relying on Home Office, Ministry of Justice, Scottish Government, and NISRA, May 2026

**Table 7: Indicative ongoing annual costs – minimum age provisions**

Cost category	Relevant Northern Ireland body	England and Wales (E&W) annual estimate	Northern Ireland indicative annual (scaled from E&W)	Scottish unit cost (per case)	Northern Ireland indicative annual
Police investigation costs (Clause 6 offence)	PSNI	£11,400 per year (central); range: £2,300 to £31,400 per year	c.£360 per year (central); range: c.£70 to £980 per year <sup>92</sup>	Not provided as annual aggregate	c.£360 per year (central) <sup>93</sup>
Prison place running costs	NIPS	c.£189,000 per year (4 places × £47,297)	c.£5,900 per year <sup>94</sup>	£44,620 per place per year	c.£57,180 per occupied place per year <sup>95</sup>

<sup>90</sup> Based on 4 new prison places at £250,000 per place (at 2021/22 prices). The England and Wales IA estimated 1 additional prosecution per year, with an average custodial sentence of 3.9 years, resulting in 4 occupied places at any given time.

<sup>91</sup> At an expected prosecution rate of approximately 0.031 per year and an average sentence of 3.9 years, the expected number of additional prison places occupied at any given time is approximately 0.12. This does not constitute a meaningful capital commitment.

<sup>92</sup> The range reflects the England and Wales IA's assumed reporting rate of between 5% and 17% of relevant unregistered ceremonies.

<sup>93</sup> As noted previously, Northern Ireland's per-capita rate of under-18 marriages is substantially higher than England and Wales (approximately 5 to 14 times). For costs that vary with marriage volume, the population-scaled England and Wales figure may therefore understate the Northern Ireland equivalent. However, the expected reduction in displacement-related marriages following commencement is likely to partially offset this.

<sup>94</sup> At the expected prison occupancy of approximately 0.12 places, this annual running cost is unlikely to arise in practice; it is presented for completeness.

<sup>95</sup> The NIPS Cost per Prisoner Place (CPPP) for 2024/25, as reported in the NIPS Annual Report and Accounts 2024-25 – available [here](#) – was £57,180. This figure is used in preference to the Scottish Prison Service proxy from scaled calculations, as it represents a directly applicable Northern Ireland-specific cost. The CPPP figure is notably higher than both the Scottish figure and the England and Wales figure, which is consistent with the NIPS being a smaller service with higher fixed costs per place, and with general inflation since those earlier figures were calculated.

Prosecution costs	PPS	Negligible (estimated: 1 case per year)	Negligible in expectation	£6,669 (solemn); £956 (summary)	Negligible in expectation; per-case cost comparable to Scottish figures <sup>96</sup>
Court costs	Northern Ireland Courts and Tribunal Service (NICTS)	Negligible (estimated: 1 case per year)	Negligible in expectation	£2,582 (solemn); £507 (summary)	Negligible in expectation; per case cost comparable to Scottish figures
Legal aid costs	Legal Services Agency Northern Ireland (LSANI)	Negligible (estimated: 1 case per year)	Negligible in expectation	£1,912 (solemn); £712 (summary)	Negligible in expectation; per-case costs comparable to Scottish figures
GRO registration fee income (reduction)	GRONI	Minimal (c.150 marriages per year × £92-£132 fee)	Minimal	Minimal (c.21 marriages per year × £45 fee ≈ £945 per year)	Minimal (c.£1,600 per year – est. 37 marriages × £44 per marriage in notice fees) <sup>97</sup>

**Source:** Compiled by RaiSe-PFSU, relying on Home Office, Ministry of Justice, Scottish Government, and NISRA, May 2026

<sup>96</sup> The Scottish unit cost figures for COPFS, SCTS, and SLAB are presented as the most directly relevant comparators for PPS, NICTS, and LSANI, respectively, given the low expected prosecution volume. These costs will only materialise if a prosecution is brought and proceeds to a hearing.

<sup>97</sup> The notice fee for marriage registration in Northern Ireland is £22 per person, yielding a total of £44 per marriage (two notices), as published by Belfast City Council, available [here](#). This is consistent with the Scottish figure of £45 per marriage notice cited in the Scottish partial BRIA. However, in Northern Ireland, marriage notices are submitted to the relevant district council registrar rather than to GRONI centrally, meaning that any reduction in notice fee income accrues to district councils rather than to GRONI or the DoF directly. The maximum annual income reduction across all affected marriages is estimated at approximately £1,600 per year (37 marriages × £44), which is minimal.

A further source of potential transition cost that does not arise in this instance concerns the legal status of marriages already contracted by parties who were under 18 at the time. Clause 10 of the introduced Bill provides that nothing in the minimum age provision affects the validity of a marriage or civil partnership in place before the relevant commencement date. This saving provision eliminates a category of transitional legal uncertainty that otherwise could generate costs. That is consistent with best practice in the noted comparable jurisdictions.

Applying the NIPS CPPP of £57,180 (2024-25), reported in Table 7 above, to the occupancy of approximately 0.12 prison places derived in Table 6 above, yields an implied annual running costs of approximately £6,860 – a figure that is small in relation to overall costs, and would not arise unless the introduced Bill would be enacted and a prosecution under its Clause 6 offence would result in a custodial sentence.

When preparing this Paper, RaISe-PFSU contacted GRONI to seek any available cost estimates or insights regarding any public purse implications for its operations, if the Bill would be enacted as introduced. GRONI confirmed that changes to printed forms and IT functionality would be expected because of the Bill's minimum age provisions, but no scoping exercise or cost assessment had been possible, as it awaits confirmation of the Bill's final requirements. GRONI also confirmed it does not hold data on non-legally binding marriage ceremonies involving under-18s. That data gap is the same as that noted in the England and Wales' final IA. Also, GRONI noted there have been no civil partnerships in Northern Ireland involving an under-18 partner throughout the 2020–2025 period.

### 3.4 Non-monetised costs and benefits

As previously outlined, the most significant financial consequences of the introduced Bill cannot be quantified using standard cost-benefit methodology.

Non-quantifiable costs arising from the minimum age provisions include the cost imposed on 16- and 17-year-olds who would have chosen to marry, but are

required to delay until 18, as well as costs to religious and community groups for whom marriage before 18 carries cultural significance.

Non-monetised benefits are likely to be considerably larger in aggregate. These could include the reduction of harms associated with child marriage, which the research evidence links to early school-leaving, diminished career and vocational prospects, adverse physical and mental health outcomes, developmental difficulties for children born to young parents and an elevated risk of domestic abuse and intimate partner violence<sup>98 99 100 101</sup>.

Given the current unknowns, the Committee for Finance may wish to ask the DoF the following:

### Potential scrutiny points

1. **GRONI system and administrative costs:** The General Register Office for Northern Ireland (GRONI) has confirmed to RaISe that changes to printed forms and IT functionality would be expected if the Bill would be enacted as introduced. Will a full implementation cost assessment be carried out by GRONI; and what would be the likely timescale for that assessment to be undertaken and its results published?
2. **Non-legally binding ceremonies:** GRONI has confirmed to RaISe that it holds no data on non-legally binding marriage ceremonies involving under-18s. Does DoF or any

<sup>98</sup> Batyra, E. and Pesando, L. M. (2021). "Trends in child marriage and new evidence on the selective impact of changes in age-at-marriage laws on early marriage", *SSM – Population Health*, 14: 100811. Available [here](#).

<sup>99</sup> Parsons, J., Edmeades, J., Kes, A., Petroni, S., Sexton, M. and Wodon, Q. (2015). "Economic Impacts of Child Marriage: A Review of the Literature", *The Review of Faith & International Affairs*, 13(3): 12-22. Available [here](#).

<sup>100</sup> Kidman, R. (2017). "Child marriage and intimate partner violence: a comparative study of 34 countries", *International Journal of Epidemiology*, 46(2): 662-675. Available [here](#).

<sup>101</sup> Wodon, Q., Male, C., Nayihouba, A., Onagoruwa, A., Savadogo, A., Yedan, A., Edmeades, J., Kes, A., John, N., Murithi, L., Steinhaus, M. and Petroni, S. (2017). *Economic Impacts of Child Marriage: Global Synthesis Report*. The International Bank for Reconstruction and Development / The World Bank and The International Centre for Research on Women (ICRW), Washington. Available [here](#).

other body – for example, the Police Service of Northern Ireland (PSNI) – hold relevant data, given that this affects both the scope of the Clause 6 offence and the associated policing and prosecution costs?

3. **PSNI and criminal justice costs:** Has any assessment been conducted of the expected costs to the PSNI, the Public Prosecution Service (PPS), the Northern Ireland Courts and Tribunals Service (NICTS), and the Legal Services Agency Northern Ireland (LSANI) arising from the new Clause 6 offence, given that the IAs in England and Wales and the BRIA in Scotland both provide estimates for equivalent institutions? (The EFM for the introduced Bill in Northern Ireland does not.)
4. **Communications activity:** Has the DoF assessed whether public awareness activity associated with the change in the minimum age could be absorbed within existing DoF communications budgets, consistent with the approach taken in Scotland?
5. **Qualifying requirements:** Has the DoF formed any intention as to whether, and within what timeframe, the powers proposed in Clauses 1(2)(d) and 4(9) of the introduced Bill would be likely to be exercised? (A decision to exercise those powers would activate the contingent costs for GRONI and belief bodies identified in the Scottish qualifying requirements BRIA.)

## 4 Key takeaways

- The accompanying EFM for the introduced Bill states no financial burden would be placed on the public purse if the introduced Bill would be enacted. That is broadly consistent with comparator assessments in England and Wales and Scotland, both of which reached the same broad conclusion that costs would be low; albeit that assessment is amongst the least analytically supported. England and Wales published detailed IAs with quantified cost estimates; and Scotland published partial BRIAs with quantified figures. By contrast, the EFM accompanying the introduced Bill in Northern Ireland offers limited detail to support its financial conclusions.
- The indicative proportional cost estimates presented in this Review of Costs suggest the Bill's direct public purse implications would be **modest and primarily one-off**. The most material cost categories would be the GRONI system and administrative updates – with an indicative range: **c.£16,000-£35,000** -and one-off training and familiarisation costs for PSNI and PPS - **approximately £35,000 each**, scaled from Scottish figures. Ongoing annual costs would be expected to be negligible, with criminal justice costs arising only if and when prosecutions under the Clause 6 offence would arise.
- These relatively low costs are consistent with the small number of under-18 marriages in Northern Ireland (around 25-59 per year), which would limit the scale of impacts across registration, criminal justice and related systems.
- A further important cost-reducing factor is that the belief marriage provisions in the introduced Bill would largely **formalise arrangements already in place on a temporary basis**, if enacted as stated, rather than introduce new systems. That would reduce the likelihood of significant additional administrative costs.
- GRONI's response to RaISe-PFSU confirms that implementation costs would arise from the minimum age provisions – particularly changes to printed forms and IT functionality – but that those could not be scoped or quantified until the Bill's final requirements are known. The Committee for

Finance may wish to further explore likely implementation costs despite that, with the Department and/or GRONI.

- It is important to note that the indicative cost estimates presented in this Review are subject to uncertainty, given the absence of detailed departmental costings and the reliance on population-adjusted comparisons with other jurisdictions.
- The most significant financial consequences of the introduced Bill cannot be monetised. The reduction in harms associated with child marriage – including improved educational, health, and economic outcomes for affected individuals, and reduced long-run demand on public services – represents a substantial, but unquantifiable benefit.
- Several areas identified in this Review warrant further scrutiny at Committee Stage of the Bill. In particular, the Committee for Finance may wish to seek from DoF: a commitment to publish a post-enactment implementation cost assessment for GRONI, once the Bill's requirements are known; and an assessment of PSNI and criminal justice costs associated with the Clause 6 offence. The scrutiny questions set out throughout the Review provide a basis for the Committee's engagement with the DoF and, indeed, other related organisational bodies on these matters.