

SERIOUS ORGANISED CRIME AND POLICE BILL

FINAL REGULATORY IMPACT ASSESSMENT

SERIOUS ORGANISED CRIME AGENCY (SOCA) AND ORGANISED CRIME POWERS

1. Title of Proposal

The creation of SOCA with new powers and the more concerted use of existing powers against organised crime.

2. Purpose and intended effect of measures

i) Objectives

The Government set out its strategic aim to reduce significantly the harm done to the UK and its citizens by organised crime in the White Paper "One Step Ahead: A 21st Century Strategy to Defeat Organised Crime" which was published in March 2004. The measures covered in this RIA contribute to achieving this aim;¹ their effectiveness will be judged by their contribution to delivering this aim. The measures are:

- a) to create SOCA – ie. to implement Chapter 3 of the White Paper in statute;
- b) to create new powers to compel individuals to give evidence and to enable reduction of sentences for persons pleading guilty and providing information or evidence for use against others – ie. to implement proposals set out in Chapter 6 of the White Paper in statute;
- c) to enable a more concerted and efficient use of existing capabilities both in civil recovery cases by Assets Recovery Agency (ARA) and on regulations around money laundering - ie. to implement the proposals in Chapter 5 of the White Paper in statute [also see Appendix 1].

This is a high level RIA to assess the impact of the mix of these measures, at the heart of which lies the creation of SOCA.

ii) Background

Currently the UK spends around £700M per annum to fight organised crime² - this figure includes spend by the 4 principal agencies fighting organised crime: National Crime Squad (NCS), National Criminal Intelligence Service (NCIS), parts of Her Majesty's Customs and Excise (HMCE)³ and Immigration Service as well as the

¹ Only those organised crime provisions in Part 1 and 2 of the Serious Organised Crime and Police Bill which met the criteria of the Public Sector Threshold Test are covered in this RIA. Other Organised Crime provisions in the Bill are: Witness protection, Financial Reporting Orders for serious acquisitive offenders and International Obligations around enforcement of overseas forfeitures and mutual assistance in freezing assets.

² Organised criminals are defined by NCIS as "those involved, normally working with others, in continuing serious criminal activities for substantial profit, whether based in the UK or elsewhere".

³ To be replaced by Her Majesty's Revenue and Customs (HMRC) in the planned Commissioners for Revenue and Customs Bill.

Police forces on related level 2 crime. Over half of this spend is in the area of Class A drugs. The spend on each of organised immigration crime, VAT fraud and excise fraud are similar to each other to a total of around £250M per annum – in terms of expenditure these are the UK's next highest priorities. A similar amount is also spent on violent and gun crime which has close links to organised crime (eg. organised armed robbery) but this almost entirely falls to the Police forces.

The harm caused by organised criminality is characterised in terms of:

- economic and social costs - not just the costs of crime both directly and to the Criminal Justice System but also the costs of anticipating the crime, the costs to the public services for the results of the crime (eg. health service for drug abusers) and the harm done to individuals and communities say by drug abuse and sex trafficking;
- the size of criminal markets – organised crime is big business so the turnover across sectors and threat areas is a measure of the harm and a pointer towards prioritising action against it (although high profit markets may prove resilient to intervention due to the relatively high incentives for criminality)
- public fear and concern – communities are blighted by the fear of violent organised crime and even lower order crime such as anti-social behaviour is fuelled by the products in which organised criminals deal (eg. illegal drugs and alcohol); the level of press coverage acts as a proxy for this concern
- wider systemic threats – public confidence and infrastructural stability is undermined by organised crime be it the integrity of public and private institutions (eg. through corruption), the political stability of the UK or the UK's competitiveness and economic stability – eg. genuine legitimate businesses being displaced or even driven out and the loss of tax revenue.

On this basis, it is currently estimated that the harm caused to the UK by all forms of organised crime may be at least £20bn per year. The areas where greater effort is needed to reduce this harm significantly are:

- Reducing the opportunities for organised criminals to make money;
- Disrupting and dismantling their enterprises;
- Raising the risks they run by more successful and targeted prosecutions of the major figures.

iii) Risk assessment

The risks associated with the current effort against organised crime are due to technical administrative, enforcement, organisational and operational deficiencies.

Technical administrative deficiencies

- Increased risk of civil asset recovery investigations being inefficient and unnecessarily cost intensive and court proceedings being ineffective. This is mainly because:
 - proceedings may fail at High Court as defendants' frozen assets disqualify them from receiving legal aid which results in a lack of legal representation even though their frozen assets could otherwise have been used to pay for this representation
 - leads or evidence that emerges during proceedings cannot be followed up or investigated further for rebuttal as defendants' records (eg. financial or property) can only be accessed during a civil recovery investigation but not once an interim receiving order is issued

- ARA bears costs of receivers who at present need to be appointed for every order freezing property even though this is not always practically necessary.
- Increased risk that UK and ARA's profile in civil asset recovery is dented internationally because enabling powers for overseas confiscation orders are not wide as domestic schemes (eg. do not include insolvency)

Enforcement deficiencies

- Inability to obtain key evidential information in ever more sophisticated organised criminal enterprises means investigations and prosecutions are prolonged or can fall. This information is often held by:
 - professional advisors and facilitators but they have no incentive to co-operate with law enforcement agencies and often pray in aid client confidentiality or are under no compulsion to answer questions or explain documents even where production orders can be used
 - other criminals involved in the group's activities but they are reluctant to testify against fellow organised criminals or have little incentive to share information when there is enough evidence to charge them; even when compelled to give evidence in court after voluntarily coming forward with materially useful information they are under no obligation to answer questions

Organisational deficiencies

- Blurring of institutional responsibilities means unclear lines of accountability – eg. NCS and HMCE are both involved in tackling drugs and fraud against business. This means there is a potential for rivalry as well as capability gaps and opportunities being overlooked
- Overlaps mean potentially wasted resource allocation and so lost opportunities in the round when prioritising finite resources
- Differing priorities mean different information collection and management systems which limits the usefulness of information shared and places a premium on interpreting information collected for a different purpose
- Lack of integrated strategic co-ordination means deficiencies in certain skill areas are not identified and redressed – eg. financial crime

Operational deficiencies

- Limited intelligence (ie. understanding and knowledge of serious organised crime) means an unclear strategic focus and blunt prioritisation which results in opportunistic deployment rather than impact based tasking
- Incomplete understanding of the damage done to organised crime as a result of enforcement activity means the true impact on organised criminality could be more or less than is understood – eg. organised criminals simply displacing their activities to other areas of criminality
- Blurring of institutional responsibilities also means there is a premium on inter-agency relationships to mitigate against potential obstruction or rivalries rather than effective, integrated and co-ordinated tasking and prioritisation. A similar premium arises when it comes to sharing information.
- Activity is not driven by intelligence other than to fulfil enforcement objectives (eg. in pursuit of individual investigations and prosecutions) which potentially limits or prolongs the investigation and prosecution process

- Intelligence products are limited to use as evidential items resulting in missed opportunities to make linkages or wider analytical processes to develop a better strategic picture of organised crime
- Emphasis on successful prosecution minimises the significance of intervention and disruption and the imaginative implementation of strategies which would otherwise prove more proportionate and cost beneficial – eg. undermining criminal enterprises through seizure of cash and assets, more international upstream co-operation, issuing alerts and warning to potential victims.

3. Options

Option 1 – Do nothing

Currently there are 4 principal agencies involved in the fight against serious organised crime: NCS, NCIS, HMCE and the Immigration Service. The work of the last 2 ranges far wider than just dealing with organised crime. Of the relevant total spend of £208M per annum for HMCE, around £80M is estimated to be for serious drug trafficking (mainly class A), the remainder being shared between VAT and excise work. Only between £2-4M per year of the entire Immigration Service's budget is dedicated to fighting organised immigration crime performed by the Immigration Service.

This option would maintain existing structures with existing powers. This would mean no additional disruption to infrastructure, national and international relationships, staff or ongoing operations as a result of structural reform and hence no drop in operational output. It would also enable the work of co-ordinating groups such as REFLEX (organised immigration crime) and CIDA (class A drugs) to continue unfettered. However, the lack of clarity between institutional responsibilities would persist, with the associated risks of operational overlap, strategic duplication or lack of co-ordination, unclear lines of accountability, inefficient prioritisation and potential gaps both in skills and activity/capabilities. The institutional cultures, ways and means of viewing enforcement and intelligence would also persist. Without additional powers, and improved capabilities with existing powers, the difficulties in ensuring efficient and effective investigation and prosecution particularly in civil asset recovery and money laundering would also persist.

Option 2 – Introduce a package of new statutory powers and amendments to existing statute to increase the efficiency and effectiveness of both investigation and prosecution as well as the existing capabilities against organised criminality.

Under this option:

- the 4 principal agencies and the police (together with ARA and Serious Fraud Office who already have the power) will, under the supervision of the Director of Public Prosecutions or the Director of Independent Customs Prosecutors (to be replaced by Director of Revenue and Customs Prosecutions), be able to require individuals to give evidence - ie. answer questions and provide information or documents
- by putting the much underused existing practice of turning Queen's evidence on a statutory footing (ie. the potential reduction in sentences), prosecutors will be able to increase the incentives for those who plead guilty to co-operate with them to provide genuinely useful information or evidence for use against others – currently, for example, only 1% of criminals turn Queen's evidence in drug trafficking cases.

- amendments to the Proceeds of Crime Act '02 (POCA '02) will increase the efficiency and effectiveness of ARA as well as reducing its costs in its civil recovery cases including:
 - creating explicit free standing additional freezing orders
 - enabling access to frozen assets to meet legal costs
 - allowing ARA to continue investigations after proceedings had started
 - allowing costs of receivers to be recovered from receipts
 - improving operational effectiveness of cash forfeiture scheme
- amendments to POCA '02 will modify the reporting and disclosure regulations around suspected money laundering

Option 3a - Amalgamation of the 4 existing principal agencies under machinery of government changes as well as all the powers under option 2:

Under this option a single agency would be brought about through the merger of the 4 existing agencies. It would be dedicated to fighting organised crime, but the 4 agencies would be brought together with the existing strategic, tactical, operational and cultural outlooks still in place. The roles, responsibilities and powers of the amalgamated agency's officers would remain in silos although greater cross fertilisation of ideas and skills would be expected. Operations would likely continue to be conducted opportunistically and without tactical integration. Fundamental differences in understanding and terminology would persist between the officers from different backgrounds and existing capability and skills gaps would remain. Most significantly the agency would most likely remain enforcement driven and intelligence gathering, storage, analysis and use would remain understood as evidential and prosecution tools.

Option 3b – Transformational change of the 4 existing principal agencies into a new agency and new operation (ie. SOCA) as well as all the powers under option 2

Under this option a new agency, namely SOCA, will be established that was dedicated to tackling and defeating serious and organised crime. This new Agency would take over all the functions of NCS, NCIS and the serious drug trafficking and recovery of related assets functions of HMCE as well as Immigration Service's responsibilities for organised immigration crime. This new agency would be more than the sum of its parts. In bringing together these existing agencies' functions against serious organised crime, it would transform them into a wholly new integrated operation with a fundamentally new outlook directed at reducing harm caused by this from of criminality and not just towards seizures and prosecutions. It would be driven by intelligence and impact rather than enforcement and would employ robust and evidence based techniques and doctrines within a clear framework of guidance and professional standards.

The strategic priorities of SOCA would be set by the Home Secretary in consultation with Scottish and Northern Irish Ministers. It would have a small yet powerful Board, including a DG who would be able to delegate one or more of police, customs and immigration powers onto his staff to meet specific tactical and operational capability needs. The new Agency would have a wide range of powers to work with a wide range of partners both in the private and public sector. It would also have the ability to exchange, use, analyse and store information from a wide range of information holders, to improve the current understanding, knowledge base and enforcement capability in a dedicated effort against serious organised crime. Specialist yet independent prosecutors would also work closely alongside SOCA's staff (if required from the outset of the investigation through to sentencing) enabling comprehensive,

practical and specialist advice to help shape investigations into better and stronger cases.

4. Costs

Option 1

The costs of the 4 constituent agencies for the functions which would be transferred into new agencies under option 3a and 3b is currently estimated as £341m for each of the financial years 2005/06, 2006/07 and 2007/08.⁴ Costs to the courts, legal aid, prosecutors and NOMS would remain as at present

Option 2

No additional costs are expected to be incurred by the 3 CJS departments as a result of these provisions. The costs incurred would remain as for option 1.

Option 3a

No additional costs would be expected.

Option 3b

The additional costs of setting up SOCA (including specialist prosecutors) is currently estimated to be at least £28M for 2005/6. This is over and above the costs of its existing constituents estimated at £341m for 2005/06 (see option 1). On the same basis, the uplift for SOCA (including specialist prosecutors) once it is established is currently estimated at £33m in each of the financial years 2006/7 and 2007/8. This is over and above the estimated costs of £341m that would be transferred from its constituents' allocations for the same financial years.⁵ SOCA will be placing a greater emphasis and effort on developing the intelligence picture on serious organised crime and on disruption, rather than simply picking off more individuals. Greater efficiency in harm reduction will not necessarily mean more downstream costs to courts, legal aid, prosecutors and NOMS. Instead these costs are currently expected to decrease, although it is not yet possible to quantify by how much.

5. Benefits

Option 1

No additional benefits

⁴ This breaks down as £175m NCS, £82m NCIS, £82m HMCE and £2m INDIS. The figures for NCS, NCIS and INDIS are based on the actual 04/05 DEL resource allocation but for HMCE on the actual 2003/4 resource allocation as figures for 04/05 are not yet available. The figures are also subject to final allocations under the HO and HMCE SR04 settlements.

⁵ Therefore the total costs of SOCA in 06/07 and 07/08 is £374m. All the figures cited are flat figures and not inflation adjusted. Efficiency savings have not yet been applied to these figures as the actual levy on NCS and NCIS has not yet been determined. Key variables include accommodation, IT meeting operational needs, the actual numbers of staff transferring, the reconciliation of differing pay scales and training (including for IT). These figures are also subject to final allocations under the HO SR04 settlement.

Option 2

Statutory provisions for compelling individuals to provide evidence and putting Queen's evidence on a statutory footing will:

- increase the chances of relatively minor criminals whose activities are exposed turning against more significant criminals.
- increase mistrust within criminal gangs reducing their potential to do harm.
- result in efficiency savings for law enforcement agencies by shortening and simplifying investigations (eg. by enabling investigators to gain access to information at an earlier stage)
- result in efficiency savings for the courts by resulting in more effective trials.

Statutory amendments to POCA '02 relating to money laundering will:

- reduce the regulatory burden imposed upon relevant parts of the private (regulated) sector by significantly reducing the number of Suspicious Activity Reports (SARs) which they will be required to submit.⁶
- reduce the burden currently placed upon NCIS by reducing the number of reports they receive and collate that are of questionable value in terms of intelligence.
- prevent damage to the international competitiveness of UK's multi-national institutions
- remove risk of staff in deposit-taking institutions committing the offence of "tipping off"

See Appendix 1 for benefits of statutory amendments to POCA '02 relating to civil recovery proceedings. It is also estimated there will be significant potential efficiency and financial savings and benefits for ARA, Crown Prosecution Service and Department of Constitutional Affairs although these have not yet been fully quantified.

Based on the number of cases that were proceeded with last year (24) and the average annual legal cost of a civil recovery case (£100K) the provision to allow access to frozen assets to meet legal costs in civil recovery cases will mean an estimated saving to the legal aid budget (run by DCA) at around £2.4M per annum.

Based on the average cost of a receiver (£150K – although they can reach £500K) and the number of live cases which required receivers last year (14 – although the numbers of these cases being passed to the Agency is increasing) and assuming the use of a receiver would be avoided in each of the 14 cases, the provision to create an explicit free standing additional freezing order, will mean an estimated saving for ARA of around £2.1M per annum. Alternatively, where the use of a receiver could not be avoided, the provision to enable costs of receivers to be recovered from the receipts of a civil recovery case would be used.

Therefore option 2 will mean the risks currently associated with technical administrative and enforcement deficiencies will be mitigated but those arising from organisational and operational deficiencies will remain.

Option 3a

By merging the 4 existing agencies, the following benefits would be expected:

- some back office, administrative and managerial savings and economies of scale efficiencies. Assuming an efficiency saving costed at around 3% on the current

⁶ The numbers of SARs submitted for the calendar year 2004 is estimated to reach around 130K compared with around 95K for 2003.

relevant costs of the 4 agencies, this would come to a saving of around £10M per annum

- clearer governance and accountability lines at the strategic level
- some greater operational and tactical synergies with the potential for closer co-ordination and tasking
- a single agency dedicated to tackling serious organised crime.

All the benefits of option 2 would still apply

Therefore option 3a will mean the risks currently associated with the technical administrative and enforcement deficiencies and some of the risks associated with the current organisational deficiencies will be mitigated. However, this agency's activity would not be integrated and would remain to some extent un-coordinated; enforcement would likely continue as the ultimate measure of success of the organisation.

Option 3b

By bringing together the new agencies into a new agency with a wholly new operational understanding and focus, SOCA will significantly add to the existing capabilities to reduce the harms caused by serious organised crime by:

- increasing the consistency and clarity of strategic approach both to intelligence and enforcement
- developing and delivering an integrated harm reduction strategy
- streamlining organisational efficiency, increasing accountability and limiting bureaucracy;
- devoting proactive and long term intelligence effort to fill out and identify strategic knowledge and understanding gaps
- delivering a clear system for proportionate, sharper and more flexible operational prioritisation and effort
- storing, analysing and using intelligence to improve knowledge, understanding, tactical performance and reporting capability thereby minimising the current opportunistic operational targeting
- delivering better intelligence products as leads for other police forces, other operational agencies and regulators
- delivering operations designed to detect, detain and successfully prosecute the most serious organised criminals through operations driven by intelligence and an appreciation of maximising impact
- delivering not only better reassurance and information for Ministers and the public but providing information to enable better resilience in other sectors – eg. target hardening by Banks against credit card fraud
- serving as the single point of contact for international partners enhancing relationships and better managing expectations at all levels
- developing new approaches to measuring the impact of its activities including better information management systems
- providing services to stakeholders locally, nationally and internationally including intelligence and spreading best practice
- identifying and filling in capability and skills gaps in key areas of organised criminality – eg. financial crime
- contributing a real evidence based operational perspective to new powers and approaches that may be required;
- identifying and mitigating against the network synergies of organised crime groups particularly opportunities taken by them for displacement across markets - organised crime groups are highly flexible in moving from one product to another.

It is not yet possible to quantify these benefits but in assessing its own impact the agency would be expected to develop systems for this. The creation of SOCA will mean a more efficient, more proportionate, more legitimately audacious and more evidence based effort against organised crime which will significantly reduce the cost and level of harm caused by it to the UK.

All the benefits of Option 2 would still apply.

OPTION 3b IS THE RECOMMENDED OPTION

6. Equity and Fairness

An initial screening test to assess the potential race and equality impact is being prepared separately for SOCA. No issues around inequitable or unfair treatment are envisaged for the other measures.

Within SOCA, race equality will form part of a wider diversity strategy which will be integral to SOCA and will include issues such as gender, age, disability, religion and sexual orientation. Prospective staff of SOCA from the constituent agencies will continue to be closely consulted in integrating diversity into the different components of the programme to set up SOCA.

Organised crime is also a major concern to various minority communities, both in the direct impact it has through the exploitation of individuals, and in the consequential impact, such as acquisitive crime to support drugs habits. It also harms relations with the wider community whose perceptions are coloured by the unfair association of particular ethnic groups with crime types given wide publicity. SOCA will work closely with local law enforcement agencies to ensure that operations are understood by the local community and that the risk of damage to community relations is minimised. SOCA will target its operations on the basis of an assessment of what is most likely to reduce the harm caused by any particular form of organised crime. Its results should be of at least as much benefit to minority communities as to the country at large.

7. Enforcement and Sanctions

SOCA

SOCA is currently being delivered through a Programme managed in the Home Office. This reports to a Steering Group chaired by an SRO who is a DG in the department. The Chairman and DG designate for the new agency are already in place and are helping to shape the programme so it delivers an operationally effective agency in April 2006.

Compelling individuals to provide evidence

To compel any person who is considered to have information relating to a matter relevant to the investigation to answer questions, provide information or produce documents, the DPP, the Director of Independent Customs Prosecutors and the Lord Advocate (or delegate), will be able to serve notice in writing to do so. The notice will set out the conditions attached to the provision of the information.

If the documents are not produced, there will be a power to require individuals to state to the best of their knowledge where they are. Failure to comply with this requirement without reasonable excuse will be an offence and on summary conviction, could result in imprisonment for a term not exceeding 51 weeks and/or a fine not exceeding Level 5 on the standard scale.

Furthermore making a statement known to be false or misleading will be an offence. On conviction on indictment, this could result in a maximum term of imprisonment of up to two years or a fine or both. On summary conviction, this could result in imprisonment for a term of up to 51 weeks and/or a fine not exceeding the statutory maximum.

Queen's evidence

In turning Queen's evidence, the defendant will co-operate with the prosecution, following a written agreement between the two parties and in return for pleading guilty and providing co-operation, the prosecution will undertake to advise the trial Court pre-sentencing of the assistance provided. The Court will then decide whether to exercise its discretion on whether and if so, by how much, the defendant's sentence should be discounted. Prosecutors will also be able to offer defendants immunity from prosecution.

Specified prosecutors will refer cases back to the Court for it to consider re-sentencing when a sentenced person has failed to provide the agreed co-operation with the prosecution. In the event of testimony proving false or misleading, sentence discounts would be revoked and the case referred back to the Court for re-sentencing.

Amendments to POCA '02

See Appendix 1 for provisions relating to civil recovery cases.

8. Monitoring and Review

The statutory provisions will be monitored and reviewed through existing channels between government departments, law enforcement agencies and the private sector, to see that their intended effect has been achieved.

SOCA will have a duty to submit and publish annual plans after consultation before the beginning of each financial year setting out how it intends to exercise its functions including its priorities and performance targets during that year. It will also have a duty to submit an annual report at the end of each financial year on the exercise of its functions during that year, including an assessment of the extent to which its annual plan has been carried out. SOCA will be inspected by Her Majesty's Inspectorate of Constabulary who are likely to draw on other expertise in conducting inspections.

9. Consultation

The White paper was published on 29 March 2004, The deadline for responses 30 July although a number of responses were received and accepted after that date. The government published its response to the consultation on 17 November 2004. 52 written responses were received. In general responses were supportive of the proposals. They agreed the harms based approach and there was broad support for

the creation of SOCA. Responses were also broadly supportive of the proposed new powers provided necessary safeguards were in place.

10. Summary and Recommendation

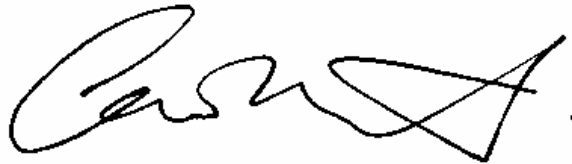
Option	Total cost per annum: Economic, Environmental and Social	Total benefit per annum: Economic, Environmental and Social
1 Maintain services through present agencies	No net additional costs to £341m. White Paper confirmed that current arrangements do not allow most effective response, organised crime likely to increase harms and costs to the economy if no action is taken.	Avoids disruption to present service delivery and offers the lowest direct costs.
2 Maintain 1 and create new statutory organised crime powers and POCA '02 amendments	No net additional costs	Increased efficiency and effectiveness of investigations and prosecutions against organised criminality as well as in ARA's civil asset recovery; reduced costs burdens for ARA and for courts (totalling around £4.5M a year) and reduced regulatory burden on parts of private sector obliged to submit SARs.
3a Amalgamation of agencies as machinery of Government change and new statutory organised crime powers and POCA '02 amendments	Costs reduced by efficiencies from amalgamation of support functions – assuming 3% on current cost of principal agencies (£341M) means £10M. Economic and social harms would not be significantly affected.	Reduced costs from back office amalgamation. Some synergies achievable and some improvements in effectiveness likely from having single management system able to determine priorities. But operational outcome benefits likely to be marginal without a fundamental re-organisation and associated costs which are not part of this option. Benefits from option 2 would still apply
3b Transformational change of previous agencies into wholly new operation and new statutory organised crime powers and	Minimum net additional transition costs to create a new organisation identified as at least £28M in 05-06 and £33M in each of 06-07 and 07-08. Further costs from long term IT and	There would be savings from back office amalgamation, but off-setting expenditure to create new operating models with associated training and rationalisation of IT and estates. Option is designed to maximise the impact on organised crime, whether through law enforcement, disruption through other means, or action overseas. It involves the fundamental

POCA '02 amendments	accommodation rationalisation to meet new objectives and working methods likely. These costs are over and above current costs of 4 principal organisations in the same functional areas (around £341M). Organisational upheaval and risk of accompanying performance dip while organisation is reconfigured	reconstruction of the component agencies to deliver a radically different attack on organised crime aimed at reducing the costs to the country of organised crime – economic and other – which would otherwise be expected to continue to grow. The real benefits will be felt by businesses and communities no longer constrained by the effects of organised crime. Benefits from option 2 will still apply. Significant reduction in cost to UK of organised crime currently estimated to be at least £20bn.
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Option 3b is the recommended option and is being taken forward by the SOCA programme for delivery by April 2006.

13. Declaration

I have read the regulatory impact assessment and I am satisfied that the benefits justify the costs



November 2004

Caroline Flint MP
Parliamentary Under Secretary of State for Reducing Organised and International Crime, Anti-Drugs Co-Ordination and International and European Issues

Home Office