



NCA Annual Plan 2017-18

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The NCA's Mission and Values

Mission

'Leading the UK's fight to cut serious and organised crime'

Values and Behaviours

The 'FIRST' values and behaviours for the agency and its officers are:

- **Flexibility** – seeking continuous improvements to the way that we work, adapting to find solutions to difficult problems.
- **Integrity** – acting with the highest standards of integrity and professionalism.
- **Respect** – treating everyone with dignity and respect, valuing diversity, working in partnership, and sharing knowledge and best practice.
- **Serving the public** – being proud to put public interest at the centre of everything we do.
- **Transparency** – being truthful, open and accountable for our actions.

Introduction

This Annual Plan is published at the start of the 2017-18 financial year. It sets out the NCA's priorities and how it plans to exercise its functions this year in leading the fight to cut serious and organised crime.

The NCA is a non-ministerial department. The Director General is appointed by, and directly accountable to, the Home Secretary and, through the Home Secretary, to Parliament. The Home Secretary determines the strategic priorities for the NCA and holds the Director General to account for the effective discharge of the NCA's functions, with the support of Home Office officials. The Director General has independent operational command of NCA activities. The roles and responsibilities of the Home Secretary and Government are set out in more detail in the Framework Document for the NCA, which can be found on the NCA's website - www.nationalcrimeagency.gov.uk.

To ensure that the NCA is an open and transparent agency, the Director General has a statutory duty to make arrangements for publishing information, as set out in Annex A of the Framework Document, and to publish such information about the exercise of the NCA's functions and other matters relating to the agency. The NCA is subject to inspection by the relevant statutory bodies in England and Wales and those in the Devolved Administrations. There is a zero tolerance approach to corruption, and a timely and appropriate response to complaints from the public.

The NCA Director General is responsible for the NCA both operationally and administratively, and is responsible for the appointment, direction of, and designation of powers to, its officers.

As Accounting Officer, the NCA Director General is responsible for the NCA's expenditure and accounting arrangements. The Director General chairs the NCA Board, which includes non-executive members. The Board's responsibilities include providing strategic oversight and performance monitoring. Further information relating to the Board, including membership and members' registers of interests, can be found on the NCA's website - www.nationalcrimeagency.gov.uk.

Context

The NCA is a law enforcement agency. The desire to protect the public is at the centre of everything the NCA does and is the focus of all decision making by NCA officers. The NCA sits at the centre of the UK law enforcement response to serious and organised crime.

Serious and organised crime is changing and evolving, becoming more challenging and complex. Its impact is felt at all levels in our communities, and its origins often stretch far beyond our borders. The NCA's focus is therefore on having the best possible understanding of the serious and organised crime threats facing the UK; the agility and flexibility of resources and approach to be able to secure an end-to-end response to a range of threats; and the ability to provide niche and national capabilities for the agency and its partners to tackle the most challenging areas of criminality.

The NCA does not work in isolation, but in partnership with a wide range of bodies, in the UK and overseas:

- law enforcement - including UK police forces, Police and Crime Commissioners, HMRC, Border Force, Immigration Enforcement, the Crown Prosecution Service and the Serious Fraud Office;
- the UK intelligence community, including the National Cyber Security Centre;
- government - including the Home Office, Foreign and Commonwealth Office, the Cabinet Office, HM Treasury and the Department for International Development;
- the private and third sectors - including charities, NGOs, banks, and other financial institutions, communication service providers and technology companies;
- regulatory bodies such the Financial Conduct Authority and Solicitors Regulatory Authority; and
- professional bodies including the British Banking Association, the Law Society and the Chartered Institute of Public Finance and Accountancy.

Foreword by the Home Secretary



Serious and organised crime is a major national security threat that preys on the vulnerable, undermines our prosperity and challenges our security. Today, around 6,000 organised crime groups comprising some 50,000 individuals currently operate in the UK. We have seen organised crime groups defraud our tax and benefit systems; evade the security of the border by trafficking illicit commodities and facilitating the entry of illegal migrants; and control local communities through intimidation and violence.

I am deeply concerned by the scale and nature of the organised crime threat, but I am also encouraged by the National Crime Agency's (NCA) operational response. The NCA has my full support for its work, but we can, and we must, go further. The Prime Minister and I want to see an increased 'whole of government' approach to tackling the threat. In order for this to happen, intelligence must be at the heart of the NCA's response. Greater collaboration between law enforcement agencies will allow us to flex against the broad range of threats facing the UK.

I have already seen the agency respond to threats in a cooperative way, through developments such as last year's joint operation with counter-terrorism police to tackle the threat to the UK from illegal firearms and the ground-breaking NCA and GCHQ joint operational cell to tackle child sexual exploitation. However, the NCA must continue to work innovatively and build on these partnerships, both within and beyond the law enforcement community, in the year ahead. The launch of the International Anti-Corruption Coordination Centre later this year, which the NCA will host, will no doubt see the agency continue to support this collective approach to fighting crime nationally, internationally and across the private and public sectors.

The NCA's transformation programme is now over half way through and is critical to the future success of the agency. Digital transformation is essential in order for the NCA to build a flexible, agile law enforcement agency and over the coming year we will see more operational benefits and efficiencies from this programme.

Transformation is a challenge but it is imperative that the NCA has the right capabilities and tools at its disposal to lead, and support partners, in the fight against serious and organised crime. That is why this Government brought forward the Investigatory Powers Act 2016 and the Criminal Finances Bill to ensure that the NCA has the powers, as well as the technology, that it needs to tackle the most serious criminals in a digital age.

In the coming year, I want to see the NCA bring more perpetrators to justice. We should celebrate each operational success, but not lose sight of the agency's fundamental mission to be relentless in the disruption of organised crime that poses the greatest risk to the UK.

The Home Secretary's Strategic Priorities for the NCA

1. Serious and organised crime is a threat to the UK's national security. The aim of the Government's Serious and Organised Crime Strategy is to substantially reduce the level of serious and organised crime affecting the UK and its interests. The Strategy has four components: prosecuting and disrupting people engaged in serious and organised crime (Pursue); preventing people from engaging in this activity (Prevent); increasing protection against serious and organised crime (Protect); and reducing the impact of this criminality where it takes place (Prepare).

National Crime Agency

2. Within the context of the Government's overall Strategy, the agency sits at the apex of the law enforcement response to serious and organised crime, and will set the national operational agenda for the response. The agency will lead operations, provide support to others - locally, regionally, nationally and internationally - and coordinate activity to ensure an efficient and effective law enforcement response, prioritised against the most serious threats and vulnerabilities.

Strategic Priorities

3. The agency has four strategic priorities:
 - a. **The relentless disruption of serious and organised crime which affects the UK and its interests**, to reduce the threat and protect the public.
 - b. **Produce and maintain the national threat picture for serious and organised crime affecting the UK and its interests**, through the collection, assessment, and reporting of intelligence. The NCA should identify emerging trends and threats.
 - c. **Lead, coordinate and support a UK and international response to serious and organised crime**, developing collaborative relationships with the police, law enforcement, security and intelligence agencies in the UK and overseas. The NCA should also work closely with the Devolved Administrations, local Government and the private and voluntary sectors focusing on areas and activity which will have the greatest impact in terms of reducing the threat to the UK and its interests.
 - d. **Enhance the organisation's human and technical capabilities**, in order to more effectively and efficiently reduce the threat from serious and organised crime. The NCA's workforce must have the skills and tools to address current and future threats.

4. These strategic priorities will inform NCA planning. Specific operational issues for the NCA may emerge which fall outside these priorities but within the NCA's functions as conferred by section 1 of the Crime and Courts Act 2013 ('the Act'). The DG NCA will be responsible for determining whether or not the NCA should pursue such operations (as set out in section 4(1) of the Act). Where the DG NCA considers it necessary, she may consult the Home Office.
5. The NCA will work closely with the Home Office to develop and maintain a robust performance framework against which the agency's work will be regularly assessed. The performance assessment will be based on a set of indicators to be agreed with the agency.

Statement by the NCA Director General



Serious and organised crime is a threat to the UK's national security, and the NCA sits at the centre of the UK law enforcement response. This year I want us to continue protecting the public by leading the fight to cut serious and organised crime.

We will do that by further developing an excellent strategic, tactical and operational intelligence picture; taking on investigations and criminals who operate at the high end of high risk and supporting others to do the same; and developing and delivering specialist capabilities on behalf of law enforcement and other partners.

The environment in which we operate is uncertain and likely to remain so. The accelerating rate of technological development, criminals' increasingly sophisticated use of technology, and the need for the legislative base on which we operate to keep pace are just some of the factors which affect us. We must be ambitious for ourselves and for our partners, seeking continually to improve what we deliver and the impact we have individually and collectively. We need to build on our achievements, be clear what the gaps in our combined knowledge and capabilities are, and strive to find the most effective ways to address them.

We start this year with a different leadership structure, and a smaller Board, making us more agile in our decision making. We have brigaded the serious and organised crime threats into three pillars to improve clarity and resource allocation:

Prosperity – to include cyber, money laundering, bribery, corruption and sanctions evasion, economic crime and asset denial;

Vulnerability – to include child sexual exploitation and abuse, modern slavery and human trafficking; and organised immigration crime.

Commodity – to include firearms and drugs.

The changing nature of the threats means we expect our focus on Prosperity and Vulnerability to increase further for the foreseeable future.

We need to continue our programme of transforming the agency across all areas, including rebuilding the IT infrastructure, while delivering more technology quick wins; completing our analysis of 'demand, risk and response' (DRR), so that we can confidently assert that our assets are best structured to deliver the Agency's priorities; progressing the rationalisation of our estate; and focusing on the development, career pathways and retention of our workforce. Alongside this, we will continue to explain UK law enforcement's requirement in light of the decision for the UK to leave the European Union.

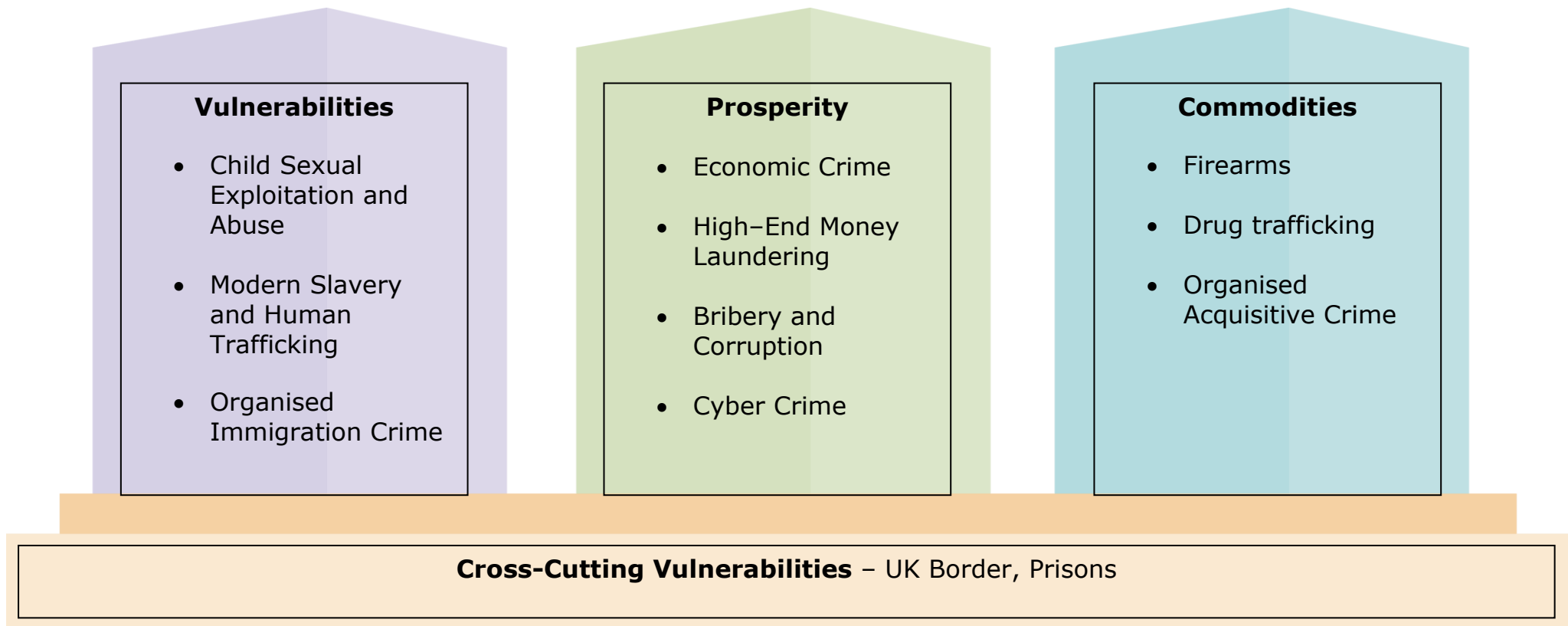
The impact of serious and organised crime is felt across the UK, but its origins stretch far beyond our borders. We must show agility in our approach, ensuring that we tackle those threats which cause the greatest harm to our communities.

A handwritten signature in black ink that reads 'Lynne Owens'.

Lynne Owens CBE QPM MA

The Threat from Serious and Organised Crime and the Threat Pillars

The National Strategic Tasking and Coordination Group (NSTCG) agrees the National Strategic Assessment (NSA) and the National Control Strategy (NCS). The NSA gives the most comprehensive picture of the threat to the UK from serious and organised crime. The NCS provides a framework for flexibly deploying the UK's collective resources to catch or disrupt more serious and organised criminals. The NSTCG has agreed the following six national priorities for response: **firearms; organised immigration crime; child sexual exploitation and abuse; cyber crime; high end money laundering; and modern slavery and human trafficking.**



The NCA Director General's Operational Priorities

The NCA's National Strategic Assessment (NSA) articulates law enforcement's shared understanding of the serious and organised crime threats impacting upon the UK. From the NSA, the NCA and its operational partners agree a National Control Strategy (NCS) which allows UK law enforcement to prioritise its response against the highest risks.

The Director General's Operational Priorities set out what the NCA will do both in respect of its own activity and in support of law enforcement and other partners at home and overseas. These are:

1. To continually enhance the intelligence picture of the serious and organised crime threats to the UK. To use that intelligence picture to flex law enforcement's collective resources against the changing threats.
2. To operate proactively at the high end of high risk, undertaking significant investigations resulting in offenders being brought to justice through prosecution, or, if that is not possible, disrupted using other means.
3. To lead, task, coordinate and support operational activity, proactively sharing intelligence, assets and capabilities with partners at local, regional, national and international levels. The NCA will prioritise the threats and allocate clear roles and responsibilities aligned with the 4Ps of the Serious and Organised Crime Strategy.
4. To develop, deploy and maintain those specialist capabilities and services that are best delivered nationally for the benefit of all of UK law enforcement, including covert intelligence, technical support and specialist bureau functions.
5. To tackle the highest risk vulnerabilities and enablers that facilitate criminals' illegal activities which threaten our safety and security.
6. To maintain a targeted and responsive overseas liaison network, allowing the NCA to identify and tackle organised crime threats before they reach the UK; supporting complex international investigations and working with partners to strengthen the UK's borders.

The NCA Response

1. Intelligence

Goal

- ***We have an enhanced intelligence picture of the serious and organised crime threats to the UK, and we use it to flex law enforcement's collective resources against the threat.***

In 2017/18 we will:

- Continue to modernise our portfolio of intelligence collection capability.
- Define the standard for a quality intelligence picture across all serious and organised crime threats. Develop the National Assessment Centre as the definitive source of strategic intelligence on Serious and Organised Crime.
- Work with our partners to improve our intelligence collection capabilities, particularly in high priority areas.
- Focus on the recruitment of officers to specialist intelligence collection functions.
- Continue our programme for professionalising our intelligence function with approved national standards and qualifications.
- Work with the private sector to encourage and support an increase in its level of intelligence reporting and increase sharing to enable the private sector to respond and protect itself from serious and organised crime.
- Implement the changes to our operational practices which have been brought about by the Investigatory Powers Act 2016.

2. Response

Goals

- ***We operate proactively at the high end of high risk, undertaking investigations which result in offenders being brought to justice through prosecution or, if that is not possible, being disrupted using other means.***
- ***We lead, task, coordinate and support activity against the most serious SOC groups and individuals.***

In 2017/18 we will:

- Use our tasking process to secure a whole system response to serious and organised crime at appropriate levels and ensure that partners are clear about their respective roles and responsibilities.
- Arrest and secure the conviction of the most dangerous individuals who are involved in organised crime.
- Target our disruptive activity so that we have the greatest impact on the most serious criminals and groups impacting on the UK.
- Continue our programme of work to target professional enablers, such as solicitors and accountants, who are engaged in facilitating criminal activity.
- Use all the tools at our disposal, including denying criminals access to their assets.
- Continuously review our activity to ensure that it remains aligned with our priorities and that we understand and can articulate the impact we are having on serious and organised crime groups, individuals and vulnerabilities.
- Pursue reactive investigative work at the UK border.
- Trial, refine and embed the new investigative model across the agency.
- Implement structural change to ensure that all taskable resource is available for deployment through the tasking process.
- Continually update the disruption manual and ensure that we promote the tools and techniques available to us and partners.
- Continue our programme for professionalising our investigative function with approved national standards and qualifications.

3. Capabilities

Goal

- ***We have developed, deployed and maintained specialist capabilities and services that are best delivered nationally.***

In 2017/18 we will:

- Support our partners and enhance their activity through the provision of specialist capabilities and functions.
- Provide technical and specialist support to major crime investigations carried out by partners.
- Communicate clearly with our partners about what we can offer and what they need to provide in response.

- Invest in new capabilities for all of UK law enforcement.
- Jointly with Counter Terrorism policing and other relevant partners, develop and deliver an ambitious programme of collaboration.
- Enhance our regional collaboration with Chief Constables and Police and Crime Commissioners through direct Director-level links and engagement with PCC regions.
- Identify burden-sharing opportunities with partners in the UK and overseas to achieve common objectives.
- Develop a more flexible, targeted and responsive overseas network that is able to respond with greater agility to the changing threats.
- Ensure that the bureau functions continue to operate in accordance with international standards and requirements.
- Build on the success of education programmes such as *ThinkUKnow* and *Cyber Choices*.
- Identify further opportunities for the public and businesses to better protect themselves from serious and organised crime.

4. Enablers

Goals

- ***We equip our officers with the right skills, workplaces and technology to lead the UK's response to serious and organised crime.***
- ***We have the trust and confidence of the public.***

In 2017/18 we will:

- Pursue agreement to a revised pay and reward framework for our officers.
- Introduce a leadership talent strategy to develop leadership potential to the requisite standards.
- Agree a workforce plan which sets out future skills and capacity requirements.
- Deliver a full transactional services review across all enabling functions to drive efficiency.

- Agree the estate footprint for the agency, including colocation with partners where this provides operational benefits.
- Deliver technology quick wins across a number of areas.
- Continue to rationalise technology, estates and fleet, thereby reducing our running costs and releasing funds to reinvest.
- Complete our analysis of *demand, risk and response*, so we can confidently assert what money is being spent for what results aiding our plans for transformation
- Increase our reputation index.
- Review the effectiveness of the new Board structure.
- Use our Independent Reference Group to sound out novel or contentious proposals which have the potential to affect public trust and confidence in us.

Exercise of NCA Functions in Scotland and Northern Ireland

In Scotland and Northern Ireland, policing and criminal justice are devolved matters. As a UK-wide agency, the NCA adapts to the different operational, legislative and political environments within these jurisdictions, to ensure it is correctly placed to contribute to the fight against serious and organised criminal activity across the whole of the UK.

The NCA will continue to engage with partners in the Devolved Administrations and with the Home Office to ensure that all jurisdictions within the UK understand the scope and nature of the NCA and are able to benefit from the specialist capabilities and functions that the agency offers.

In Scotland, the NCA will continue to work in partnership with Police Scotland, law enforcement agencies, and other public, private and third sector partners, in order to contribute to the objectives of Scotland's Serious Organised Crime Strategy, which was refreshed in June 2015. The NCA is co-located with Police Scotland and other key law enforcement partners at the Scottish Crime Campus in Gartcosh. This co-location provides for improved intelligence exchange and pooling of resources to tackle the threat from serious and organised crime. The NCA will contribute to the work of the Scottish Serious Organised Crime Taskforce and the production of the Scottish Multi-Agency Strategic Threat Assessment.

The delivery of the NCA's functions in Scotland is governed by Memoranda of Understanding (MoU) with Scottish Ministers and with the Lord Advocate's Office. The Director General can designate appropriately-qualified NCA officers with the Powers of a Scottish Constable. The NCA conducts its own operations in Scotland with the consent of the Lord Advocate as well as complementing the investigations of Police Scotland and other Scottish law enforcement partners, particularly where the span of criminality extends into England and Wales and onto European and international jurisdictions.

In Northern Ireland, the NCA contributes to the revised Northern Ireland Organised Crime Strategy and works in partnership with the Police Service of Northern Ireland (PSNI) and other law enforcement agencies within Northern Ireland towards achieving these objectives. The NCA continues to engage with the Organised Crime Task Force Stakeholder Group and a number of its subgroups.

The NCA is fully operational in Northern Ireland and this is reflected in the breadth and nature of the activity the NCA is able to undertake and the enhanced support it can provide to law enforcement partners, especially PSNI. This includes undertaking operations within the PSNI force area, and operations centred outside Northern Ireland, where organised crime groups have an impact that spreads beyond national and international boundaries and into Northern Ireland. NCA officers will continue to carry out a range of criminal investigations in collaboration with PSNI in Northern Ireland, recognising the specific legislation and regulations in place.

In developing its plans for the year ahead, the NCA will continue to engage widely in Northern Ireland. The NCA respects the importance of community oversight and monitoring in Northern Ireland and will ensure that all its activities are fully cognisant of the operating context, engagement and accountability arrangements within the area. All NCA officers exercising functions in Northern Ireland are required to complete training on the PSNI Code of Ethics and pass an examination before they are allowed to exercise functions in Northern Ireland. A breach of the code of ethics by an NCA officer in Northern Ireland will be treated by the NCA as a disciplinary matter.

The Director General of the NCA values the opportunity, and will make every effort to attend both public and private meetings of the Northern Ireland Policing Board, on a biannual basis. In the exceptional event that her attendance is not possible, a suitable representative will attend in her place. The Director General will provide quarterly performance reporting on the exercise of the NCA's functions in Northern Ireland. The NCA has regard to the Annual Northern Ireland Policing Plan when setting out how its functions will be exercised in Northern Ireland, consulting, as necessary, with the Chief Constable PSNI, to assist in PSNI's reporting and accountability responsibilities to the Northern Ireland Policing Board.

The NCA continues to participate in the new cross-jurisdictional Joint Agency Taskforce (JATF), which builds on existing policing efforts in Northern Ireland. This was introduced as a result of 'A Fresh Start: The Stormont Agreement and Implementation Plan', which was agreed by the Northern Ireland Executive and the British and Irish governments in November 2015. It introduced two key themes; the JATF and more recently, the opportunity to consider options for a shared endeavour with key law enforcement partners to tackle organised criminality with links to paramilitarism. The NCA has worked with the PSNI and HMRC in this proposal, which is currently being considered by the Fresh Start Programme Board.

Disruption Assessment and Performance Reporting

The Home Secretary holds the Director General to account for performance of the NCA against four key performance questions (KPQs) on a quarterly basis. The four KPQs are set out below.

<p>KPQ 1. How comprehensive is the NCA’s understanding of threats?</p>	<p>KPQ 2. How effective is the NCA’s response to these threats?</p>
<p><i>High confidence in a single national intelligence picture to lead the UK’s prioritised law enforcement response against serious and organised criminal groups, individuals and vulnerabilities.</i></p> <ul style="list-style-type: none"> • Good level of understanding of the scale and nature of the threats. • The mapping of serious and organised criminal groups and individuals is comprehensive and covers all threat areas. • Good level of understanding of those serious and organised criminal groups, individuals and vulnerabilities that present the highest threat to the UK. 	<p><i>The NCA relentlessly disrupts high priority and priority threats.</i></p> <ul style="list-style-type: none"> • Effective deployment of resources to cut serious and organised crime. • Relentless disruption of serious and organised criminal groups, individuals and vulnerabilities through Pursue activity. • Use of innovative and non-traditional disruptions to cut the threat from serious and organised crime through Prevent, Protect and Prepare activity.
<p>KPQ 3. How effective is the NCA at working with partners?</p>	<p>KPQ4. How effectively does the NCA manage resources?</p>
<p><i>The NCA is effective at leading, supporting and coordinating and its capabilities add value to partners’ activities to identify and disrupt serious and organised criminal groups, individuals and vulnerabilities.</i></p> <ul style="list-style-type: none"> • Effective at leading, supporting and coordinating the national response to serious and organised crime. • Provision of a valued and useful service to partners through the NCA’s range of specialist capabilities and bureau functions. • Effective working with international partners to reduce the threat of serious and organised crime to the UK. 	<p><i>An agile and flexible agency with well-led and highly motivated officers having access to the capabilities required to identify and disrupt serious and organised criminal groups, individuals and vulnerabilities.</i></p> <ul style="list-style-type: none"> • The NCA Transformation Programme’s delivery of agency transformation on time and to budget. • Be the employer of choice with effective, highly skilled, capable and motivated officers to deliver its mission. • Demonstrate commercial sense and sound financial management.

NCA operational activities are tasked with the intention of disrupting serious and organised criminal groups, individuals and vulnerabilities.

The NCA Disruption Manual provides a range of disruption and prevention capabilities and specialist knowledge which can be used to disrupt and cut serious and organised crime. Covert activities – such as surveillance and intelligence development – will not themselves disrupt; however, they will underpin the operational activity that does, either in support of NCA activity or that of other law enforcement partners.

Any law enforcement activity is potentially a disruptive event and will be recorded and assessed. This assessment provides an indication of whether or not the NCA is relentlessly disrupting those involved in serious and organised crime, and will be used to inform decision making and performance reporting.

The NCA will continually review and monitor what and how disruptions are captured and measured and how it works with partners.

The table below sets out how the NCA will capture and measure disruptions.

Who?	The NCA is committed to the relentless disruption of those groups, individuals or vulnerabilities that present the greatest threat to the UK.
What?	A disruption has been achieved when an individual or group is unable to operate at its usual level of activity for a period of time, or there has been an effect on a vulnerability, and this has impacted on the threat. A disruption may be achieved by any activity covered by Pursue, Prevent, Protect or Prepare and will have involved some form of intervention, prompted by the appropriate agency, which has resulted in a positive output or outcome against a threat.
Why?	Relentless disruption of groups, individuals and vulnerabilities is central to cutting serious and organised crime. It is one of the primary indicators of NCA activity.
How?	The NCA will capture all its operational activity against serious and organised criminal groups, individuals and vulnerabilities and record and assess all events aimed at disrupting them. Events and overall impact will be assessed as: Major, Moderate, Minor, or None. It is recognised that all assessments incorporate a degree of subjectivity, therefore to mitigate this and to ensure consistency, all disruptions are assured through an independent moderation process by a panel which includes external stakeholders.
When?	Assessment will take place regularly as part of the performance reporting regime.

Financial Resources

The NCA is a non-ministerial Government department and secures its funding directly through its own Supply Estimate, Voted by Parliament. For 2017-18, the NCA has:

- A resource Departmental Expenditure Limit (DEL) of £433.5m.
- A capital DEL of £50m.

The figures reported are in accordance with budget controls agreed with the Home Office officials and HM Treasury and reflect NCA Board-approved budgetary targets. The NCA, as a non-ministerial department, requires parliamentary approval of its Vote funding for 2017-18.

These budgets cover the costs of the full range of NCA activities over the coming year, set out elsewhere in the Annual Plan, excluding income and funding received from other sources.

NCA budgets 2017-18	£m
Resource DEL	433.5
<i>of which: Administration</i>	31
<i>Programme</i>	402.5
<i>of which: depreciation</i>	46.6
Capital DEL	50
Total DEL (excluding depreciation)	436.9