Consultation

Did you take part in either of the Scottish Government consultation exercises which preceded the Bill and, if so, did you comment on the financial assumptions made?

1. Yes. Our comments on the financial assumptions were more comprehensive at the earlier stages of the bill consultation.

Do you believe your comments on the financial assumptions have been accurately reflected in the FM?

2. The Financial Memorandum does not appear to reflect the additional costs associated with the implementation of GIRFEC and the named person. There is a turnover of teachers each year and there will be a requirement to raise their awareness of their statutory responsibilities in terms of the named person element.

3. There will also be costs associated with establishing the named person responsible for those young people who are aged between 16-18 who have left school but not progressed to college or university. Dundee City Council will need to commission voluntary sector services to undertake this statutory duty which will result in additional costs that do not appear to be reflected in the Financial Memorandum.

Did you have sufficient time to contribute to the consultation exercise?

4. Whilst we did respond to the consultation exercise by the deadline, more time would have been appreciated to provide a more comprehensive response within the timescales allowed. In addition, more clarity around the implications of the changes would have been useful particularly in relation to kinship care.

Costs

If the Bill has any financial implications for your organisation, do you believe that these have been accurately reflected in the FM? If not, please provide details?

5. GIRFEC – as stated in question 2, there will be an on-going responsibility for training in terms of staff statutory responsibility for named person. There will also be a requirement to commission additional services from the voluntary sector for those young people who have left school and are not in Education aged 16-18.

6. Early Learning and childcare – there is now an obligation for LA’s to offer flexibility in terms of how the Early Learning and Childcare is to be delivered. This is difficult to quantify until the consultation has been undertaken. Our estimates based on the range of patterns of service delivery in October 2012 highlight a potential
funding shortfall compared to the notional additional funding allocations included in the Financial Memorandum.

7. Early Learning and childcare capital costs – there potentially will be a requirement to expand the number of places on offer in certain of our nurseries but not sure what the financial implications will be of this at this stage.

8. In relation to the proposed Kinship Care arrangements the Financial Memorandum assumes that the “avoided costs” will more than offset the additional costs associated with the introduction of additional duties to local authorities in supporting kinship carers resulting in a zero direct recurring cost arising from the Bill. However the FM does not take cognisance of the various and distinct Kinship Care and Residence arrangements in place across Scotland and it is argued that the avoided costs have been overestimated. At paragraph 130 of the Financial Memorandum it states “because the kinship care order acts to prevent a child becoming looked after unnecessarily, this would give rise to future avoided costs compared with the expenditure local authorities would need to make otherwise”. It is difficult to determine how this will arise – for example Dundee City Council currently makes weekly allowance payments to both kinship carers and those subject to residence orders and would continue to do so under the new arrangements. Therefore the assumption that further Social Work interventions and expenditure would no longer be required as a result of these arrangements is unrealistic. We have concerns that a number of informal kinship care arrangements not currently known to Social Work will become eligible for enhanced support resulting in additional costs to the authority.

9. It is difficult to know exactly what the potential additional costs will be for the additional duties associated with the new arrangements for Kinship care and family therapy given the types of assistance are yet to be prescribed by Scottish Ministers in secondary legislation.

10. The additional costs associated with extending through care and aftercare support appear to be based on reasonable assumptions.

Do you consider that the estimated costs and savings set out in the FM and projected over 15 years for each service are reasonable and accurate?

11. For all areas please see comments as stated in question 4. We assume this question relates to 5 years rather than 15.

If relevant, are you content that your organisation can meet the financial costs associated with the Bill which your organisation will incur? If not, how do you think these costs should be met?

12. As stated in question 4 there are elements of the Bill which are difficult to quantify at this stage. In the current financial situation being experienced by local authorities, all costs associated with the implementation of the Bill should be met by the Scottish Government.
Does the FM accurately reflect the margins of uncertainty associated with the estimates and the timescales over which such costs would be expected to arise?

13. Early Learning and Childcare – it is not possible at this stage to determine whether the increase in staff costs associated with offering flexibility is reasonable or not. The Financial Memorandum indicated that they took account of different flexible options set out in the consultation document and assumed this would be the range of options from 2018-19. Three of these options were estimated to be in-excess of Dundee City Council’s GAE share from the Financial Memorandum.

14. Kinship Care – as in 4 above, it is difficult to comment on the reasonableness of the assumptions when not all additional responsibilities have yet been defined. There are concerns regarding the projected level of “avoidable costs” reflected in the Financial Memorandum. This leads to the assumption that the new arrangements will result in substantial longer term “savings” and can therefore be delivered at no additional cost to local authorities.

Wider Issues

Do you believe that the FM reasonably captures costs associated with the Bill? If not, which other costs might be incurred and by whom?

15. Questions 2, 4, 6 and 7 reflect Dundee City Council’s position.

Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?

16. Again this is difficult to answer until more details emerge.