CONSULTATION

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

1. The local authority and the Community Health Partnership Officer Locality Group for Children and Young People took part in the consultation exercises which proceeded the Bill. Reference was made in the Council’s response to potential financial implications, at that stage not quantified.

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

2. In relation to the 600 hrs of early learning and childcare for three and four year olds and vulnerable two year olds, the financial assumptions sit somewhere in the middle of the local authority costings based on the potential models of delivery. Comments made in relation to Kinship Care are less well reflected given the complexity of trying to put accurate financial planning assumptions in place based on the information available.

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

3. Yes.

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?

4. The costs in relation to the establishment of the development of 600 hrs of early learning and care will allow the local authority to develop models of provision but will not meet the government’s aspiration of a fully flexible service. Local authorities have different provision and therefore it is difficult to start from a common baseline.

5. It is difficult to be fully confident in relation to funding for early learning and care for 2 year old children on kinship care orders as uptake is unknown.

6. The costs set out in the financial memorandum in respect of the named person are clear in their financial assumptions which are made. However, there is concern that there is not a recognised ongoing cost to local authorities in the same way that there is an ongoing cost recognised for the NHS.

7. It has been very difficult for local authorities to accurately estimate what the costs will be in relation to Kinship Care and support for young people leaving care.
8. This has been an issue across local authorities and recognised in COSLA’s discussions with Scottish Government representatives. It particularly relates to being able to accurately estimate the number of kinship care orders.

**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?**

9. Similar comments to 4 above. The added dimension is the potential impact of welfare reform and the recession on an additional range of families who might otherwise not require assistance.

10. Although it is believed a genuine attempt has been made by the Scottish Government to assess costs/benefits, the financial risk to local authorities is the accuracy of the financial model.

**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?**

11. The overall policy direction in respect of the Bill is commendable and there are many aspects of the legislation which are to be welcomed. However, the Bill is being presented to Parliament at a time of significant reduction in public resources coupled with additional pressures demographically, economically and socially.

**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?**

12. The fact that the FM notes that the incremental increase in flexibility is more complex to estimate than just additional hours, as well as the fact that there is recognition that models developed by individual authorities will vary due to local need suggests that allowance is included for these margins of uncertainty.

**WIDER ISSUES**

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

*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?*

13. Not possible to comment without further clarification.