Consultation
Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?
1. The Council did respond to the consultation exercise but did not comment on financial assumptions made

If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?
2. Not applicable.

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 they have been accurately reflected in the FM? If not, please provide details.
4. The Council is of the opinion that the current level of administration funding provided by the Scottish Government is not sufficient to provide the service level processing times required for community care (15 days) and crisis grants (2 days). Since the commencement of the Welfare Fund on 1 April 2013 the following have occurred all of which have increased the number of applications to the fund: awareness of the fund has increased, a number of changes have been made to the guidance all of which have led to increased demand, the numbers of customers who have had their benefit sanctioned has increased leading to more applications to the fund. The Council believes that the administration funding requires to be increased by 20% to ensure the provision of good customer service.

Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?
5. The Council is of the opinion that the level of grant funding is reasonable and accurate but that the level of administration funding is not due to the reasons detailed at 4 above.

If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?
6. The Council is of the opinion, as stated at 4 above, that the level of administration funding is not sufficient to provide the level of service required. Given that the fund is a new burden to Local Authorities the Council is of the opinion that these additional administration costs should be met by the Scottish Government. Alternatively, the Scottish Government should allow Local Authorities to move funding from the grant fund to the administration fund to ensure good customer service is delivered.
Does the FM accurately reflect the margins of uncertainty associated with the Bill’s estimated costs and with the timescales over which they would be expected to arise?

7. The Council is of the opinion that the margin of uncertainty is reflected within the FM.

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

8. The Council is of the opinion that the FM does not capture all costs associated with the Bill. The following costs are not included: publicity for changes to guidance (both as a result of the Bill and any future changes), IT/software costs. In addition the Bill does not include any provisions for dealing with Fraud. Dealing with Fraud could involve a visiting programme on a percentage of claims to establish that there was a requirement for the goods. Currently it is assumed the Local Authority will meet these costs. The Council is of the opinion that these costs should be met by Scottish Government.

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?

9. The Council is unable to determine or quantify any possible future costs at this time.