Consultation
Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?
1. Yes

If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?
2. Yes

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. At a local level, we are experiencing significant pressure on our SWF budgets. This is unsurprising given the socio-economic, poverty and wider deprivation indicators in our area. Core programme spending is managed through setting priority levels, and for the year to date these are set as “HIGH” for both Crisis Grants and Community Care Grants. This is resulting in increasing numbers of applications being refused (or accepted but at a lower value than that applied for), where the assessment of priority does not match our priority levels for payment. We anticipate programme funding being fully utilised in the current financial year.

Administrative funding also presents a challenge in terms of the resources necessary to deliver a fully effective service. Whilst not arguing for more administrative funding at the expense of programme funding, there does require to be a realistic provision of funding to deliver the service. The pressure on the team can occasionally require additional support to be provided from the core Benefits Processing Teams, which can lead to issues in that service area.

It is unlikely that significant “savings” will accrue from the decision to transfer 2\textsuperscript{nd} Tier appeals to SPSO. Cases will need to be produced and presented to SPSO, with the potential opportunity for decisions to be overturned. This would increase pressure on the programme funding budget that cannot be fully controlled by the Council.

Robust evidence to support the claim that the cost of core services, S12 payments and homelessness costs are reducing through LA’s administering the SWF has yet to be seen. It is not appropriate to suggest potential savings can accrue in this area
without a strong evidence base. It is however, acknowledged that a holistic approach can be of benefit to our most vulnerable residents in terms of managing their situation, but this of course can result in the Council requiring to deliver additional services to a previously unknown client group.

The option to top funds up locally is a discretion that usefully remains in the Bill although use of this would clearly have financial implications locally. It is important to emphasise the discretionary nature of this power.

There will be the potential (almost inevitable) for further IT software changes and associated costs (eg around decision letters) arising from the legislation and associated regulations. It will be important to ensure these are adequately funded.

**Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?**

5. Not entirely for the reasons outlined in section 4. Furthermore, in relation to SPSO activity around 2nd Tier appeals, this in itself could represent a significant cost burden to the process. As pressure builds on programme funds, it could be anticipated that more applications will be refused and more appeals therefore lodged. This is clearly an unknown and will require ongoing review.

Care must be taken to consider the cost of the process (from the initial application through to 2nd Tier appeal) against the amount of grant funding being applied for. In EAC for 2013/14, the average value of CCG and CG awards were £505 and £76 respectively. Proportionality must remain a consideration for the scheme.

The holistic approach does bring additional costs, particularly where a client was previously unknown to the Council.

**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. Additional pressures on the administration of SWF will impact on the core budgets of the “host” service. In the case of EAC, this is the Revenues and Benefits service, which is already experiencing increased demand, and reduced administrative funding from DWP. Delivering this important service remains a key focus, however funding it at the expense of other (equally important) service areas is not sustainable.

**Does the FM accurately reflect the margins of uncertainty associated with the Bill’s estimated costs with the timescales over which they would be expected to arise?**

7. The greatest level of uncertainty with the Bill is around 2nd Tier appeals. The Bill does capture some sensitivity analysis around this, but it is difficult to anticipate if the lower / upper levels are appropriate.

**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. I am not aware of any additional costs that may be incurred, although anecdotally CAB are reporting significant volumes of SWF appeal work. What impact 2nd Tier appeals moving to SPSO is likely to have is difficult to gauge without knowing how SPSO intend dealing with these.

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. No