Consultation
Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?
1. No

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. Not applicable

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 financial implications are clearly demonstrated but the variations are significant from £5,000 to £50,000. It is expected that each Authority Plan will average between £20,000 to £30,000. This consultation represents the requirements to develop an Authority Plan. It is difficult to identify why there are such variations in financial costings. This consultation is not about the size of the organisation or the number of BSL users. It would be realistic to suggest that financial costs will be similar for all authorities. This consultation is not about future provision of ensuring that BSL users have BSL interpreters where required, it is about the development of a local plan.

Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?
5. It is difficult to assess the costs in advance, as some public organisations may incorporate the development of a BSL Authority Plan into the existing work plan of an employee already in post.

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. Yes, if the development of an Authority Plan is undertaken by the Equality and Human Rights Department who already manage BSL provision this would ensure that the plan would be built on existing work, knowledge and links with BSL users and BSL interpreters. There are already processes and staff training in NHS Fife which can be used to build upon.
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. Yes they reflect the margins of uncertainty and the timescales.

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 Financial Memorandum does not take into account the development of the Health and Social Care Integration. There is an opportunity to plan on the basis of the new integrated joint bodies and the parent Health Boards and Councils, thus realising an economy of scale. This will prove easier in areas with coterminous Boards and Councils. It also does not take in the existence of the online BSL interpreting with NHS 24, which is proving challenging to deliver at a local level.

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. Yes there will be a requirement to provide the Authority Plan in a format that is accessible for BSL users. Other information and consultations that NHS Fife has provided in the format of a DVD has an average costing of £2,000 per assignment. There is a suggestion*6 and *7 (page 11) that the development and monitoring of the National Plan will require extra staff resources. Could this role be given addition time/financial resources to help authorities develop consistent, relevant and robust local Authority Plans that have recognised minimal standards? It would be financially prudent if every organisation did not have to independently develop an Authority Plan. This has been evident with the development of the Equality Outcomes (Equality Act (2010)) where all public organisations had to develop them independently which is costly and demonstrates no shared learning. A national guidance approach would be cost effective, whilst still allowing organisations to be responsible for the implementation of the Authority Plan whilst having the power to add any additional actions appropriate to different areas.