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. SASLI contributed a response to the consultation preceding the proposed Bill. The response made a brief comment which indicated no expected negative impacts from the Bill, based on the information on the proposed Bill at the time.

If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?
2. No, SASLI made the assumption based on the anticipated contents at the time of consultation, such as the proposed provision of BSL classes and an Advisory Board to work with the designated Minister.

Did you have sufficient time to contribute to the consultation exercise?
3. SASLI is a national charity organisation with members geographically dispersed across Scotland. The consultation exercise was an important piece of work which would require consultation with the members. Additional time would have enabled the members to get together a number of times to discuss the contents for the consultation to ensure as much information-sharing and representation from the members.

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 Memorandum lists anticipated costs for the listed authorities, but none for ancillary organisations which may be requested to provide information, expertise and advice to meet the objectives. This includes organisations representing, or working with, BSL users and communication support.

Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?
5. No costs are included for BSL translation of findings and Performance Reviews. Paragraph 6 states that ‘there is no requirement within the Bill for consultation exercises and plans to be produced in BSL format’ (Financial Memorandum) which contradicts with the main purpose of the Bill in promoting BSL, and restricting the duty on authorities to ‘increase the use they make of BSL and the extent to which they are in a position to respond to demand for services in BSL’ (Paragraph 4, Financial Memorandum).
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. SASLI anticipates some ancillary organisations with expertise and information will see increased costs as they will be asked to contribute resources and advice to assist listed authorities to achieve their outcomes on the Authority Plans. SASLI foresees an increase in demand for consultation and advice with regards to communication support and registered interpreters. This will however not occur immediately. The BSL Bill intends for listed authorities to consult with BSL users up to 12 months after the National Plan is produced, and once every Parliament session for Performance Reviews. SASLI predicts the Bill to impact local charity resources and national charity organisations (if no similar service is available locally) such as SASLI.

Larger staff numbers and resources will be required to meet the increased demand for information and consultation. SASLI will require to seek both increased and alternative income streams to provide for additional resources required by the Bill. Increased interest in BSL will lead to a higher number of members of SASLI which will generate increased income for the organisation, but this alone will not be sufficient to meet the costs necessary to implement change.

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. SASLI believes the uncertainty is clearly reflected within the Financial Memorandum as it has no definite basis for the costs apart from the Gaelic Act which requests additional provisions in comparison to the BSL Bill.

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. See answers to Questions 14 and 15.

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. SASLI anticipates there will be additional costs with regards to implementing other legislation with implications on the activities of public authorities and listed authorities, as the BSL Bill will require these bodies to provide information of services they are required to provide under other legislation.

SASLI is not in a position to quantify potential costs as it has no involvement on the finances of health and public authorities.