BRITISH SIGN LANGUAGE (SCOTLAND) BILL:
FINANCIAL MEMORANDUM SUBMISSION
FROM SCOTTISH LEGAL AID BOARD

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. It is not clear if SLAB were directly consulted in 2012.

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 Bill is likely to have financial implications for our organisation. The full impact will to some extent depend on content and expectations set by the Scottish Government’s National BSL Plan which public authorities will be expected to reflect in their own BSL plans.

There is likely to be cross over of activity, and therefore costs, under this Bill and work SLAB is already doing to meet our obligations under the Public Sector Equality Duty and Scottish Specific Regulations. SLAB has set four outcomes to work towards which includes activity to improve communications with deaf people. This work is planned up to April 2017 and will be reviewed thereafter.

Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?
5. The factors taken into consideration seem reasonable however the range of costs is wide. The estimated costs SLAB may incur will depend on the scope of work needed to meet our obligations under this Bill that differ from our current obligations under the Equality Act 2010. As noted in 4. above, there may be cross over with work public authorities are already doing in line with equalities legislation and therefore some costs may already be accounted for, with limited additional resource required for this Bill.

SLAB is a member of the Criminal Justice Disability Project Group which is a collaborative project aiming to improve access to criminal justice for disabled people, including deaf people and the range of communication support which can better assist them to access justice (e.g. BSL interpreting, use of lip readers and note takers).
Any activity SLAB undertakes to assist people who require interpreting whether for BSL or other minority language will need to be proportionate to our business and remit and the wider community as a whole.

*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. Given the current and ongoing pressures on public spending, SLAB can not currently commit to having the financial means to meet any significant costs arising from this Bill.

*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.

**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 FM captures the direct costs to the organisation to implement the Bill i.e. staff time, consultation and publication of the plan, review of progress and costs to implement the plan.

*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. We have no comment to make.