Dear Sir/Madam

BRITISH SIGN LANGUAGE (SCOTLAND) BILL
SCOTTISH PRISON SERVICE (SPS) RESPONSE TO THE FINANCIAL MEMORANDUM

I write in relation to your recent E-Mail inviting submission of evidence setting out the views of the Scottish Prison Service on the financial implications of the British Sign Language (Scotland) Bill.

Please see below my response in question and answer format to allow you to cross-reference with ease.

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

No.

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

N/A.

3. Did you have sufficient time to contribute to the consultation exercise?

N/A.

4. 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.

The FM considers only the cost of producing an Authority Plan and these have been adequately reflected in the FM. However, the Bill covers not only the production of Authority Plans, but also the implementation of measures to be taken in relation to our use of BSL and the potential for developing its use in connection with our functions. That aspect has, understandably, not been costed in the FM, but will clearly have implications if we are to implement meaningful measures to achieve the objectives of the Bill.

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

Yes, in as much as they pertain only to the production, consultation and monitoring of an Authority Plan.

6. 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?

We would be able to meet the cost of developing and publishing the Plan. However, the costs of implementing the measures contained within the plan are unknown and therefore, we cannot comment on this.

7. 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?

Yes.

8. 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?

The FM does not capture the cost of translating consultation material and the final Plan(s) into BSL, though it explicitly acknowledges this. It is reasonable to expect that listed authorities may do so in order to facilitate consultation and to ensure accessibility of the final plan, and that we would therefore incur this cost.

The FM does not capture the cost of implementing the measures identified in Authority Plans. These are currently unquantifiable as they are unknown.

Increased demand for BSL interpreters could drive up costs for listed authorities requiring their services (either in the translation of materials associated with the Plan, or in the delivery of the measures contained within the Plan).

9. 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?

The reference to an order at 3(3)(d) of the Bill is not clear on what other information may be required by order, therefore it is not possible to comment on the ensuing cost.

Were an order given to require a plan to be published at a date sooner than provided for in the Act (as per section 7(1)), then costs would likely increase as greater resource would be required in order to meet the timescales. The actual cost would depend on the change in timescales and is therefore not quantifiable on the information available.
I appreciate the opportunity for the Scottish Prison Service to submit our views in relation to this Bill.

Yours faithfully

Colin McConnell

COLIN McCONNELL
Chief Executive