Consultation
Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?
1. WDC Response: Yes, WDC did take part in a consultation re the bill in February 2014 around the option for challenging decisions on SWF application. However we have not made any comments on the financial assumptions to date.

If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?
2. WDC Response: Not Applicable

Did you have sufficient time to contribute to the consultation exercise?
3. WDC Response: 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. WDC Response: N/A. We believe the bill has not changed from the interim model, on which WDC’s costs are based

Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?
5. WDC Response: It’s hard to say as WDC is not aware of the specific needs and circumstances of other Local Authorities. The grant funding from 2013/14 demand seems to be appropriate however we do feel there is pressure on the SWF team which is reflected in the admin funding. WDC has had to increase the SWF team by 1.5 FTE to cope with that demand. Furthermore, if the reduction of admin funding from £5m to £4.6 in year 2015/16 is as a result of reviews moving to SPSO, WDC would not support the same. This is because we have not factored this into our costs when working out admin costs and furthermore only had 3 Tier-2 reviews in 2013/14.

The savings are not estimated, but even if they were they are not deliverable in West Dunbartonshire. WDC had 3 second tier appeals in 13/14 and transferring this will not allow any staffing reduction.

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. WDC Response: If the demand for service increases or WDC is required to consider offering goods as an option for CCG’s, it would mean a need to revisit funding levels as it would entail greater staff time to administer as well as increase
the average award. Furthermore, our existing funding is based on DWP estimates from 2011/12 which were 4,740 application for Crisis Loans and 2,200 applications for CCG. However in reality WDC received 6,983 Crisis Grants and 2,514 CCG applications in 2013/14. Therefore we believe there is a need to increase both the grant funding and the admin funding.

*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. WDC Response: The only area where uncertainty is mentioned is in relation to the second tier review organisation’s costs. No concerns regarding this, other than, as stated above, there will be no saving in many LAs as there have been very few second tier reviews. So this assumption is not valid.

The other uncertain area is regarding demand levels and associated direct cost of financial support and of the administration of the scheme. Demand is uncertain and perhaps for this reason the total grant pot should be subject to annual review as to sufficiency (in total and per LA). Linked to this is the level of administrative support – which is currently under-funded for WDC and for which an additional resource should be provided.

**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. WDC Response: Subject to comments at item 7 (above), yes for Scotland overall however there needs to be further analysis of individual LA demand to reflect specific needs and funding adjusted accordingly

*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. WDC Response: Not aware of any at this point.