Consultation

Did you take part in either of the Scottish Government consultation exercises which preceded the Bill and, if so, did you comment on the financial assumptions made?

1. Yes, Scottish Borders Council submitted estimated costs of implementing the 5 options regarding the 600 hours early education and childcare proposals and confirmed at that time they believed the estimated budget allocation to be sufficient. Scottish Borders Council, along with community planning partners, submitted a detailed response to the draft bill at consultation stage.

Do you believe your comments on the financial assumptions have been accurately reflected in the FM?

2. The FM recognises that the final models of delivery cannot be fully anticipated. We await confirmation that the full funding will be allocated to local authorities on the basis of the proportionate share for the national GAE.

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

3. Yes, we were able to respond within the deadlines set.

Costs

If the Bill has any financial implications for your organisation, do you believe these have been accurately reflected in the FM? If not, please provide details.

4. In respect of the financial implications for 600 hours of early education and childcare, it is anticipated that the figures quoted in the FM (based on this council’s proportionate share of the national GAE) will be sufficient to cover additional costs. However, Scottish Borders Council have not agreed their delivery model so it is difficult to give a definitive response at this stage. On the issue of capital funding to support the 600 hours we are assuming that this would be allocated to local authorities on the basis of the proportionate share of GAE giving Scottish Borders £700,000 over the three year period 2014/15 – 2016/17. If this capital fund were to be allocated in any other ways e.g. through a challenge fund, this council would have some concerns.

5. With regard to the Named Person we have some concerns around the financial profile as contained within the FM. Assuming the additional funding is allocated on the proportionate share of the national GSE, we estimate that £219,928 has been allocated to Scottish Borders in 2016/17.

6. Scottish Borders Council, along with its community planning partners, is already committed to the concept of the Named Person and plans to roll out this model during 2013/14. The council requests that the financial profile to support local
authorities implement the Named Person be amended to makes resources available from 2014/15. This council notes that funding to support the introduction of the Named Person is being made available to NHS Boards from 2014/15.

7. Scottish Borders Council also believes that additional funding to support the Named Person needs to be available for more than one fiscal year. The Highland Pathfinder showed it took several years to implement the cultural changes required within and across organisations in order to implement GIRFEC. Scottish Borders Council believes funding requires to be made available over three consecutive years starting in 2014/15 to ensure the successful establishment of the Named Person role.

8. Kinship Care – The FM appears to assume that if carers successfully apply for a kinship care order, they would no longer require financial support. In relation to current s11 processes, we do not find this to be the case and if financial support was not available, it is believed that carers would not progress to a kinship care order under the new arrangements. Alternatively, if the Council on a discretionary basis was to continue to provide the required financial support to carers (carers’ allowance) then this would put an additional financial burden on the Council of up to an estimated £150k p.a. Additionally, current Welfare Benefits arrangements do not support kinship carers or carers on low income.

9. Counselling – It is unclear from the language and terminology used in the Bill and FM as to what type of intervention is being referred to with various terms such as “Counselling”, “Mediation”, “Family Therapy” and “Family Group Conferencing” being used relative to the current Social Work role. As a result, quantification of the level of savings that will be accrued from implementation of this provision of the bill is not possible.

10. If it is anticipated that the above are purchased services in addition to core then this will come at a significant additional cost to the Council. The types of services provided or described can clearly be one-off, short-term or long-term therapeutic and as a result, their individual financial implications are difficult to identify, but clearly they will vary. The Bill appears to imply that the above provisions would reduce future need and the costs of meeting this need, but there is no direct evidence to support this and the fact that ongoing support (and not a single intervention) would be required.

Do you consider that the estimated costs and savings set out in the FM and projected over 15 years for each service are reasonable and accurate?

11. Scottish Borders Council, as detailed above, has a concern that the estimated costs of establishing the Named Person role within the local authority is not sufficient to ensure this part of the Bill is effectively implemented. Funding requires to be available for more than one fiscal year and the profile needs to be amended to allow finances to be available in 2014/15.

12. With regard to the evidence of the benefits of GIRFEC (paragraph 53 of the FM), Scottish Borders Council and its partners have been designing and delivering services to children, young people and families around the principles of GIRFEC for
some time. This includes the establishment of locality early intervention programmes, locality multi-agency teams, a single plan with a common assessment framework etc. As a consequence some of the tangible benefits described in this section of the FM have already been recorded and efficiencies have been made within service providers to reflect this. Whilst totally supporting the concept of the Named Person role, this council is cautious about projecting what additional cost savings will result through its implementation.

13. From the provisions in the bill and FM, it remains unclear as to whether the forecast additional costs, savings and future saved costs will in turn be used as a basis for reducing funding to the Council. Given the high-level approach to identifying these factors on a macro national basis, we are concerned that this will only have a detrimental effect on the Council's ability to continue to provide and fund services.

If relevant, are you content that your organisation can meet the financial costs associated with the Bill which your organisation will incur? If not, how do you think these costs should be met?

14. Notwithstanding the comments made previously Scottish Borders Council is aware that other aspects of the Bill may put some resource pressure on the council. For example to extension of powers to the Children’s Commissioner so that office will be able to undertake investigations in relation to individual children and young people will inevitably require time and resource, if that investigation is centres in or around the local authority.

15. Scottish Border Council’s comments regarding the financial costs are based on the assumption that the additional funding will be distributed based on this council’s proportionate share of the national GAE. If this was not to be the case, the council may require to reconsider its views on the financial implications

Does the FM accurately reflect the margins of uncertainty associated with the estimates and the timescales over which such costs would be expected to arise?

16. The main areas of uncertainty/risk identified by this council were around staff ratios, supporting local needs and flexibility requirements around the early learning and childcare. These are now reflected in the FM. The one-off nature of the financial support for the Named Person may result in budget pressures for this authority

Wider issues
Do you believe that the FM reasonably captures costs associated with the Bill? If not, which other costs might be incurred and by whom?

17. As previously described, Scottish Borders Council believes that financial support for the implementation of the Named Person needs to be available earlier than 2016/17 and that support needs to be allocated over at least a three-year period to allow the successful implementation.

18. The council has some concerns around the projected avoided costs arising from diverting children from formal kinship care. Does this mean that GAE allocations would be reduced proportionately from 2015/16 based on these financial assumptions?
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?

19. It is not possible to quantify at this time