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. A number of departments across the Council participated in the Consultation and commented on the financial assumptions being made.

Do you believe your comments on the financial assumptions have been accurately reflected in the FM?
2. Based on the analysis of the different areas of the Bill, it appears that reasonable assumptions have been made in terms of costing the implications of the Bill, and therefore reasonable levels of funding have been allocated for Duties Relating to the Named Person and Child’s Plan and Corporate Parenting. However, the Council has concerns in relation to the costs identified for Early Learning and Childcare (including a need to clarify the allocation method for capital monies), Throughcare and Aftercare, Kinship Care and Counselling (including Cost Avoidance monies for the latter 2 areas).

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 these have been accurately reflected in the FM? If not, please provide details?
4. As noted in the response to question 2 above, it appears that the financial implications of Duties Relating to the Named Person and Child’s Plan and Corporate Parenting are captured by the FM. However, the figures for Early Learning and Childcare (in the first 3 years), Throughcare and Aftercare, Kinship Care, and Counselling (inc. Cost Avoidance for Kinship Care and Counselling) do not reflect the financial implications for the Council.

5. Specifically, in terms of the funding made available for Early Learning and Childcare, the monies noted by the Government do not appear adequate in the first 3 years. Moving forward, the principle of the additional funding to allow for the expectation of incremental increased flexibility within Early Learning and Childcare provision in future years is welcomed. In terms of the Capital Spend, the Council has not confirmed its requirements yet however, it does acknowledge the allocation made. In relation to capital, the Council feels it would be appropriate to ask Councils what they require to spend on capital works in order to inform the allocation process.
6. With regard to the allocation for Throughcare and Aftercare, current costings appear sufficient up to 2017/18 but show a shortfall thereafter.

7. In the areas of Kinship Care and Counselling Services, whilst “cost avoidance” is not quantifiable nor guaranteed, the Council does expect costs will be incurred. These do not appear to have been taken into account. This is an area of significant concern for the Council.

8. The Council will only be able to provide services and flexibility to the level of new funding provided.

**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?**

9. As noted in the response to question 4 above, the additional funding to allow for the expectation of incremental increased flexibility within early learning and childcare provision in future years is welcomed. However, local authorities will have to ensure that the level of flexibility offered to enhance service delivery does not exceed the level of affordability provided from the additional funding.

10. The allocation for Throughcare and Aftercare is sufficient up to 2017/18 but insufficient thereafter.

11. In the areas of Kinship Care and Counselling Services, whilst “cost avoidance” is not quantifiable, costs are expected. These do not appear to have been taken into account.

**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?**

12. The shortfalls in allocation are noted in previous responses above (questions 2, 4 and 5). Given these shortfalls, it is suggested that the Scottish Government could re-visit these areas.

13. The Council will only be able to provide services and flexibility to the level of new funding provided.

**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?**

14. As above.

**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?**

15. In addition to the shortfalls noted above, there are also costs associated with training for the Minimum Qualification for Foster Carers (which for the Council amounts to £0.070m).
16. There are likely to be additional costs associated with counselling services. The extent and accessibility of local authority and NHS counselling services for Children and Young People is currently limited. A key aspect of the preventative approach is meeting the emotional, psychological and mental health needs of Children and Young People through counselling and family therapy. There is currently no provision in the FM to invest new funding in this key service area.

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?

17. The Council would expect that their ongoing monitoring of implementing the Bill would identify any secondary issues.

Other Comments
18. n/a