Dear Ellen,

The Committee issued a call for views on the Financial Memorandum which closed on 8 Aug and received 17 responses. All responses have been published on the Committee's website.[1] The Committee agreed to write to you setting out the main points raised by respondents and to copy to the lead committee to help aid their Stage 1 scrutiny of the Bill.

A number of respondents felt that the FM was reasonable in its estimation of the costs of the Bill however some respondents raised a number of issues—

- Additional costs relating to training. Trainer costs, Staff costs and potentially travel / accommodation costs (NHS Orkney, South Lanarkshire Council, Aberdeenshire Council)
- Some ‘uplift’ for island (and other remote rural settings) is required, for example no allowance appears to be made to back fill teaching heads in small schools.(NHS Orkney)
- Whilst there is some provision for Education staff who will operate as Named Person the numbers involved who require the training are likely to be more than those proposed in the financial memorandum. A more reflective cost for Education in South Lanarkshire is £147,864, which is based on the actual numbers of staff listed below who will require the

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refreshed guidance and training at least 7 hrs per staff member. (South Lanarkshire Council)

- The FM does not include any funding to support the training on requirements of the Bill for Social Work staff. (South Lanarkshire Council, West Dunbartonshire Health and Social Care Partnership)

- There is a need to revised guidance material to be issued to all staff in who work directly with children and families (South Lanarkshire Council, Glasgow City Health & Social Care Partnership, Glasgow Children’s Services, East Renfrewshire Council, Aberdeenshire Council, Association of Directors of Education)

- No consideration given within the memorandum regarding financial commitments for Police Scotland. The likely finance and resource commitment required by Police Scotland to effectively implement the new legislation within the required timescales should be considered on a par with our colleagues in local authorities and health boards. (Police Scotland)

- Police Scotland will still require to develop and deliver its own bespoke training packages and additional support materials. Consideration should be given to funding this provision. There also appears to be an assumption that Police Scotland will not require to backfill training abstractions when financial provision is being made in respect of other agencies. Police Scotland would hope that this would be subject of further consideration by Scottish Government. (Police Scotland)

- The Financial Memorandum appears to only take account of costs for year one with no financial provision thereafter, with an expectation that all recurring costs of training will be absorbed into business as usual. (Police Scotland)

- Potential additional costs incurred from dealing with Freedom of Information requests (Police Scotland, Aberdeenshire Council)

- The cost of revising local procedures and guidance combined with staff training with regard to the legal changes and the duty to comply with the Code of Practice is likely to be considerably more than has been estimated. (Argyll and Bute Health and Social Care Partnership)

- It is difficult to predict at the present time the impact of the revised Data Protection Regulations 2018. (Argyll and Bute Health and Social Care Partnership)

- There is insufficient resource being allocated for training, education and supervision for health visitors, and the one off nature of the training. (Royal College of Nursing)

- There will be additional time required to record every information sharing decision. This will have a time implication for managers and administrative staff in schools. It is important that national guidance provides good advice
and keeps these processes clear and as simple as possible to support staff. (Stirling Council)

- Training backfill expenses should include the following Social Work, Acute and Adult Services, Police Scotland and the Third Sector. (Glasgow City Health & Social Care Partnership, Glasgow Children’s Services, NHS Ayrshire and Arran, East Renfrewshire Council)

- Concerns regarding the proposal to establish a “small project team of 4 people to engage in a programme of design and co-produce generic and topical resources for stakeholder groups”, at the cost of £180,000. ‘The reason we question this approach, is because of past experience, in 2016 a National CPD Named Person programme was delivered to Health Visitors, the reports back were that the training was too basic and did not meet their needs. They felt the knowledge they had gained from local training, meant they knew more than the trainers’. (Glasgow City Health & Social Care Partnership, Glasgow Children’s Services)

- Additional costs from services such as – Social Work, Paediatrics, Accident & Emergency, AHPs, CAMHS, Mental Health and Addiction Services and from a Partnership perspective there is a wider issue with regard to all those that come into contact with children and young people in the course of their day to day work where their principle client is an adult; there are many services however we would wish to prioritise; Adult Mental Health, Addiction Teams, Housing and Social Services. The information duties and responsibilities have an impact on those sectors and therefore consideration will need to be given to training and raising awareness. (NHS Ayrshire and Arran)

- No reflection of costs relating to the impact of information sharing provisions on training and raising awareness for the wider staff group in health boards regarding their role in information sharing with the NP relating to any child wellbeing concerns they have identified. These staff groups include Adult Mental Health, Substance Misuse, CAMHS, Paediatric staff, GP’s, Dental, Allied Health Professionals. Learning Disability, Accident and Emergency staff. (NHS Tayside)

- Additional administrative and reporting costs (Aberdeenshire Council, NHS Tayside )

Yours sincerely,

Dr James Johnston,
Clerk to the Committee