Consultation

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

   No, NHSGGC did not take part in any consultation exercise preceding the Bill.

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

   Not applicable.

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

   Not applicable.

Costs

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.

   It is an extremely complex area, and as outlined at paragraph 15 of the FM, “There is difficulty in providing figures for most of the areas provided for in the Bill. There are a number of reasons for this......” It is not possible at this time for NHSGGC to estimate any financial implications. However, the assumptions and the process followed within the FM to arrive at the estimates appear reasonable.

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

   As in 4. above

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?

   NHSGGC currently has a savings target for 2017/18 of £90m – which is proving extremely challenging. Whilst 2018/19 does not currently appear as challenging, the organisation remains in a very perilous financial position. Whilst we would anticipate that potentially a part of any increase in costs may be met through CNORIS, any increase in costs, or premiums through CNORIS, would be very difficult to cover.
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?

As in 4. above

Wider Issues

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?

As in 4. above

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?

Future costs are difficult to predict, but highly likely. A more comprehensive assessment and scenario planning would be essential to enable quantification.