Consultation

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

   Yes.

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

   The Financial Memorandum does not appear to deal with the administrative costs of Discretionary Housing Payment (DHP), nor contain anything to indicate how funding for DHP will be calculated. It is not made clear how the budget will be set.

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

   Yes.

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 would be helpful if the Financial Memorandum contained an indication of how both the cost of DHPs and the administrative costs of the DHP scheme will be calculated.

   There is a specific risk of increased costs to administer DHP for UC claimants, and this will be more significant if the current level of data exchange is not improved as UC caseload increases. Similarly, the unknown timeframe to shift mitigation of the 14% and 25% reductions for the Removal of the Spare Room Subsidy from DHP to UC housing costs adjustment, means that these increased costs of DHP administration remain with the local authority.

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

   This question has not been considered as a whole, as the focus of the Financial Memorandum is very much on how this may impact on the Scottish Government.

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?
It’s not clear. Although Part 4 of the Bill empowers local authorities to make payments to persons to assist with their housing costs and introduces new requirements around publicity, paragraph 66 and 74 seem to restrict the costs to LAs to “face-to-face pre-claims and support services”, rather than costs associated with direct administration which will occur for example in DHP.

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?**

Glasgow City Council has not taken a view on this.

**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?**

May be costs of implementing systems to support use of a range of public sector locations, including costs associated with securing data, collecting management information and common information technology requirements. This type of cost could fall to either Scottish Government or the local agency.

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?**

Glasgow City Council has not taken a view on this.