



The Scottish Parliament  
Pàrlamaid na h-Alba

## Finance and Public Administration Committee

Audrey Nicoll MSP  
Convener  
Criminal Justice Committee

**17 December 2025**

Dear Audrey

### Prevention of Domestic Abuse (Scotland) Bill

As you are aware, the Finance and Public Administration Committee (the Committee) is responsible for scrutinising Financial Memorandums for Bills. As part of its scrutiny, the Committee ran a Call for Views on the Financial Memorandum (FM) for the Prevention of Domestic Abuse (Scotland) Bill. We received 8 responses to the call for views and they have been published on [Citizen Space](#).

The main points raised by the respondents are summarised below. The key message was that the FM underestimates some of the costs necessary to implement the Bill.

#### Part 1 – costs related to the implementation of notification requirements for domestic abuse offenders

Several submissions noted that the staff costs have been underestimated. The FM assumes that each caseworker dealing with MAAPA notification requirements has a case allocation of between 50 to 60. COSLA notes that the figure in the FM is in “direct conflict with the Social Work Scotland Setting the Bar report, which advised that 20 -25 cases per worker was manageable and safe”.

East Renfrewshire Health and Social Care Partnership, South Lanarkshire Council, and Police Scotland agreed with COSLA’s view that the FM sets an unrealistic caseload target.

COSLA further explained that there are additional costs for staff working on MAAPA, such as enhanced vetting.

South Lanarkshire Council indicated that “the assumption that no further costs will arise beyond staffing under MAPPA in year one does not reflect the full scope of operational requirements”.

Contact: Finance and Public Administration Committee, The Scottish Parliament, Edinburgh, EH99 1SP.

Email [FPA.committee@parliament.scot](mailto:FPA.committee@parliament.scot). We welcome calls through Relay UK and in BSL through Contact Scotland BSL.

The Crown Office and Procurator Fiscal Service (COPFS) expressed concern that “a statutory monitoring scheme would divert crucial police resource from a currently effective, non-statutory partnership and multi-agency response to risk management, safety planning and offender management”.

The diversion of resources was said to “ultimately limit effective investigation and reporting of domestic abuse charges to COPFS, and thus curtail COPFS’s ability to prosecute those perpetrating domestic abuse”.

## **Part 2 – costs related to the assessment of offenders for rehabilitation services**

Several submissions indicated that the costs of the Caledonian programme have been underestimated. Social Work Scotland explained that the FM incorrectly assumes that the Scottish Government fully covers the costs of the Caledonian programme.

COSLA provided data from one local council which suggests that the programme cost per person amounts to approximately £3,460 per person. This is materially higher than the cost of £2,325 per person outlined in the FM.

## **Part 3 – costs related to the requirement to collect data from the victims of domestic abuse**

Social Work Scotland stated that although the FM “assumes minimal costs for local authorities”, additional data collection duties will have costs related to system upgrades, staff training and quality assurance. This view was shared by COSLA.

COPFS also added that “given the range of data to be collected [...] implementation is likely to require significant system updates with corresponding resource implications”.

## **Part 4 – costs of domestic abuse education in schools**

COSLA argued that the FM does not “reflect the resource implications for schools, particularly in rural and under-resourced areas” given that no direct implementation costs are identified for the schools themselves.

## **Other issues raised in evidence**

Police Scotland estimates that the Bill will have, for the police, an opportunity cost of approximately £2 million in the first year of operation. The submission explains that the opportunity cost includes “officer extraction for training and project related resource costs”.

COSLA noted that the FM fails to account for the “cumulative pressures and the unaccounted for/hidden financial burdens already facing and being carried by councils across Scotland”.

We invite the Criminal Justice Committee to consider, as part of your wider scrutiny of the Bill, the evidence received by this Committee on the FM.

Yours sincerely,

**Kenneth Gibson MSP**  
**Convener**