

FUTURE EUROPEAN STRUCTURAL FUNDS PROGRAMMES IN LOWLANDS & UPLANDS SCOTLAND 2007-2013

RESPONDENT INFORMATION FORM

Please complete the details below and return it with your response. This will help ensure we handle your response appropriately. Thank you for your help.

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1. Are you responding: (please tick one box)
- (a) as an individual go to Q2a/b and then Q4
- (b) on behalf of a group/organisation go to Q3 and then Q4

Individuals

- 2a. Do you agree to your response being made available to the public (in Scottish Executive library and/or on the Scottish Executive website)?

Yes (go to 2b below)

No, not at all We will treat your response as confidential

- 2b. **Where confidentiality is not requested**, we will make your response available to the public on the following basis (**please tick one** of the following boxes)

Yes, make my response, name and address all available

Yes, make my response available, but not my name or address

Yes, make my response and name available, but not my address

On behalf of groups or organisations:

3. The name and address of your organisation **will be** made available to the public (in the Scottish Executive library and/or on the Scottish Executive website). Are you also content for your **response** to be made available?

Yes

No We will treat your response as confidential

Sharing responses/future engagement

4. We will share your response internally with other Scottish Executive policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future in relation to this consultation response?

Yes

No

Question 1: Are there any additional socio-economic factors to be considered - and which Structural Funds can address - in assessing the strengths, weaknesses and opportunities of Lowlands & Uplands Scotland?

One of the factors which is not mentioned in the draft Operational Programme is the effect of the influx of immigrants, mainly from Eastern Europe, in the last two years since enlargement of EU in 2004.

Reports suggest that 32,000 immigrants from Eastern Europe have settled in Scotland since 2004, 20,000 of whom are Polish. It is thought that the total number, including unregistered immigrants could be as high as 100,000 (*The Scotsman 9 November 2006*).

While the addition of these immigrants has been welcomed, boosting the Scottish economy, reversing Scotland's falling population and filling many low-skilled jobs, there are additional pressures which have resulted in this influx. In terms of the education sector, one of the main problems identified is that many immigrants coming to Scotland to find work have very poor English language skills, creating communication difficulties in the workplace and barriers against immigrants integrating into local communities. Anecdotal evidence would suggest that this is particularly acute in rural areas, such as Fife and Angus, where colleges have experienced a huge upsurge in demand for English for Speakers of Other Languages (ESOL) provision.

The Structural Funds could address this issue by making specific mention of, and provision for, training and education for immigrant workers in order that these workers can make a full contribution to the Scottish economy and culture.

Question 2: Do the proposed priorities for the 2007-2013 ERDF programme in Lowlands & Uplands Scotland address the strengths, weaknesses and opportunities of the region?

In general, yes. One of the disappointing aspects of the 2000-2006 Structural Funds Programme was the lack of support for the refurbishment of the estates of Scotland's colleges. Although refurbishment of educational facilities was included within the programme, the initial level of funding proposed was wholly inadequate given the scale of the underinvestment made in the college estate by previous (UK) administrations.

It is therefore pleasing to see that Priorities 2 and 3 both make specific mention of the need to 'support the refurbishment and enhancement of local training and education centres' (Priority 2) and 'Improving the higher and further educational resources in rural areas' (Priority 3). However, given the scale of the problem throughout Scotland, some thought needs to be given to the funding available for this aspect of the programme in order to match the funding being provided by the Scottish Executive, via the Scottish Funding Council, for estates development in the college sector.

Question 3: Do the proposed priorities for the 2007-2013 ERDF programme in Lowlands & Uplands Scotland show appropriate coherence and concentration?

In general, yes. Splitting of priorities between urban and rural areas will only work if there is a clear method for identifying these areas and the eligibility of applicants within these areas to access funding. For example, would an applicant (i.e. a college) based in an 'urban' area, but whose work is conducted largely in a 'rural' area (and thus benefiting beneficiaries in a 'rural' area) be eligible to access funding from Priority 3? What level of modulation will be allowed to accommodate projects which are substantially 'rural' in nature but also encompass a small amount of 'urban' beneficiaries – will the urban beneficiaries be ineligible in this case or will there be some leeway to include participants from other eligible Priorities, proving greater flexibility and coverage for the Programme?

Question 4: Do the proposed priorities for the 2007-2013 ESF programme in Lowlands & Uplands Scotland address the strengths, weaknesses and opportunities of the region?

Yes. The embedding of gender imbalance issues within the Priorities, rather than having a distinct priority for this issue, is particularly welcome.

Question 5: Do the proposed priorities for the 2007-2013 ESF programme in Lowlands & Uplands Scotland show appropriate coherence and concentration?

Yes. The priorities focus on the target groups requiring the most assistance, i.e. getting the workless into work, increasing the skills levels the existing workforce and further developing the Lifelong Learning agenda in Scotland.

It would be helpful to clarify whether Priority 2 will be targeted directly at the beneficiary (the employee) or via their employer, as this will have a significant effect on how projects are designed to reach the beneficiary target groups.

Under Priority 1, although it is essential that support for the long term unemployed continues to be addressed, the 2000/2006 programme has highlighted the need to ensure we also focus on the short term unemployed, especially those in the 0-6months unemployed category. If intervention measures are not addressed at an early stage of unemployment (especially with young people 16-24 years), this often leads to them falling into the long term unemployed category.

Question 6: What are your views on the proposed balance of funding between priorities for the future ERDF programme in Lowlands & Uplands Scotland?

The funding to be provided for ERDF Priority 1 (i.e. 48% of the proposed annual allocation) appears to be excessive when compared to the relatively narrow scope of the priority. The Priority, as written, would suggest that the

bulk of the funding available would be available to the University sector (commercialisation of RTD), the Scottish Enterprise Network (increasing new firm foundation, survival and growth rates) and a small group of environmental consultants (University sector again) to increase and embed environmental sustainability. Given the performance of the 2000-2006 ERDF Programme, is there not a danger of committing a large percentage of the available resource into a very narrow scope?

Question 7: What are your views on the proposed balance of funding between priorities for the future ESF programme in Lowlands & Uplands Scotland?

Priority 2 should be better funded than Priority 1. The focus should be on providing sustainable and long term employment opportunities (and a workforce sufficiently skilled to fill these positions. This will naturally create vacancies in existing organisations which can then be 'fed' by those beneficiaries who are supported by Priority 1.

Question 8: Do the proposed priorities outlined in the draft Operational Programmes focus sufficiently on the right priorities in Scottish domestic policy?

Yes. However, it would be useful for the Programme to include some method of signposting to other major sources of funding which applicants could access to provide match funding (e.g. The Big Lottery, Coalfields Regeneration Fund etc) and whose objectives have a synergy with those of the 2007-2013 programmes.

Question 9: What are your views on how the principle of environmental sustainability has been integrated into the Operational Programmes?

Very welcome. Environmental sustainability is a strong focus for all organisations and while the 'introduction' of this issue in the 2000-2006 programme was appreciated, awareness and a willingness to embrace this issue over the past few years means that embedding within the Programme is timely.

Question 10: What are your views on how the principle of equal opportunities has been integrated into the Operational Programmes?

Again, very welcome. As with environmental sustainability, the issue of gender imbalance is one which has matured and gained a greater deal of publicity (and understanding) since its inclusion as a Priority in the 2000-2006 Programme. However, singling out this issue in the previous Programme did have the unfortunate effect of 'ghettoising' gender imbalance projects. Integration within the new Programme will negate this unfortunate by-product.

Question 11: What are your views on how the Operational Programmes will ensure complementarity between Structural Funds and other EU funding streams?

No comment to make on this issue.

Question 12: How can the challenge-fund approach be improved to make it more effective in delivering outcomes and more efficient in operation?

During the 2000-2006 programme lead times for submission of applications was very short in relation to application forms (which were often changed) and guidance being available to project partners. The timescale for scoring and approval by the management authority was often greater than those given to prepare applications. To ensure more efficient operation of new programme, applicants would greatly benefit from having full documentation at least 3 months prior to any deadline dates for submission

Question 13: What would be the most effective approach to using Community Planning Partnerships and other local partnerships for the delivery of elements of the programmes?

Community Planning Partnerships (CPPs) should only be funded to deliver elements of the programme where they have an existing track record of delivering successful projects which match with the ESF Priorities and are able to show that they have a sound background of collaboration and the necessary administrative and management resources in place to operate as a mini-IAB.

The costs associated with supporting the CPPs to deliver non-challenge funded elements of the Programme should be transparent and should be included in the overall costs of running the Programme to the Scottish Parliament (as should the costs associated with any other Intermediate Delivery Body).

Question 14: What are your views on spatial targeting for community regeneration under ERDF Priority 2 and ESF Priority 1?

There is no doubt that the Programme funds should be targeted at the most disadvantaged communities. However, careful consideration needs to be given to the method used to define the eligible areas. The criteria need to be clear, current and readily available to applicant organisations.

Question 15: What are your views on spatial targeting for rural development under ERDF Priority 3?

The definition of 'rurality' must be carefully considered. Areas such as East Fife, for example, are largely rural with small communities distributed throughout the landscape. How will these communities be defined? As with the current spatial targeting, there could be instances where one village is

eligible for assistance while another village a few miles away is denied. A robust definition will be required in order that these sorts of issues can be clarified at the earliest possible stage.

Question 16: Do you have any additional comments on the draft Structural Funds Operational Programmes for Lowlands & Uplands Scotland?

It is unfortunate that the Operational Programmes for Lowlands & Uplands Scotland (and the entire process for managing the Programmes) have been delayed until this extremely late stage. Structural funding is an important element of support for the areas of our society which require most help, and yet we find that Programmes which should have been ready to start in January 2007 may now not start in earnest until late Summer/early Autumn 2007. While it is difficult to gauge the impact of this delay (albeit with the proposed Priority 1 'shadow' round in early 2007), the effect of the overall Programme(s) will have been significantly diluted by the setback to the January 2007 start.

Similarly, the 'development' of the existing Programme Management Executive structure to the new Intermediate Administration Body (IAB) and Intermediate Delivery Body (IDB) structure is unwelcome. While it is recognised that the existing structure had to be reviewed and revised in light of the reduction in Structural Funds available in the 2007-2013 programme, to completely redesign the arrangements as proposed and to do so at such a late stage in the process will create confusion, inefficiency and possibly a delay to the programme funding being spent, creating N+2 issues for the Scottish Executive.

The lack of consultation on the future guidance and regulations for the 2007-2013 programmes is unwelcome. This information is absolutely vital to all applicant organisations and past experience has shown that, as these regulations are created in a vacuum without adequate consultation, then the practicality of applying these regulations is not understood, which at best can cause (fairly long term) frustrations between the applicant and PME (IAB) and at worst can put an applicant off applying altogether. Would it have been possible to have held the same sort of consultation on the new regulations as is being held on the draft Operational Programmes and gather the comments of a wide variety of applicant organisations?