

## CONSULTATION RESPONSE FORM

**Question 1 – Are there other areas you think the Partnership Agreement should address?**

**Question 2 – Do you think these thematic objectives will best address Scotland's short-term and long-term challenges?**

**Question 3 – Do you think there are any other thematic objectives which should be addressed?**

**Question 4 – Do you think the Scottish Themed Funds will address Scotland's key challenges?**

**Question 5 – How do you think the governance and delivery arrangements will impact on your sector?**

Link appreciates the difficulties in managing such a large and complex fund, but we do feel that the third sector (and in particular social enterprises) are inadequately represented at the Delivery Partnership level.

HAs have been largely absent in the delivery of programmes utilising EU funds in the last 6 years and had very little involvement prior to this. Earlier this year we sought to contact the Scottish Government's Structural Funds Programme to discuss how we might better engage prior to the launch of the next programme and had no response. Although we were allocated a space at the ESF Awards and Consultation launch event, we have not been able to engage with the Scottish Government team since this point, despite a number of attempts.

The thrust of this is that we feel that in the previous structure it was not possible for us to engage. We fear that given the proposed design of the new structure – which is largely based on the previous programme – we feel that we are likely to be in this position again. As far as we can determine from the documentation produced there is no real route for organisations to engage as 'new entrants', unless they move through CPPs. As a national organisation operating within 24 local authority areas we do not feel that this is an adequate mechanism to enable us to fully deliver the range of activities we can offer.

Link is in the process of co-ordinating the coming together of a consortium of up to 20 HAs who already offer a wide range of employability, digital and financial inclusion measures that could be significantly enhanced by the use of EU funding. These organisations are well managed and have good quality financial management systems that can enable reporting, whilst also being in a good position to provide match funding either through accessing external funding or through their own resources e.g. removing entry-level work from the maintenance programmes as opportunity for training. Given the complexities and the range of these interventions we feel that we need a voice at this table and are concerned that given the proposed representatives that there will be no-one present to represent our tenants and communities.

**Question 6 – How do you think the governance and delivery arrangements will impact on your organisation?**

See above.

**Question 7 – Are there any unidentified governance or delivery arrangements that could aid simplification of the future programmes and ensure that the Structural Funds complement each other?**

**Question 8 – What other delivery options do you think would be feasible for delivering youth employment initiatives?**

Although HAs have not traditionally been directly involved in using ESF to deliver employability activities we believe that given the range and scale of employability activities now offered by HAs that collectively we represent a significant opportunity to contribute to the employability agenda by utilising ESF.

Link is currently looking into the following employability routes, which would all include provision for young people. This list is not exhaustive:

- Supporting apprenticeships and work placements with Link's in-house trades team;
- Offering support to contractors engaged with Community Benefits in Procurement (CBIP), further increasing the number of apprenticeships and work placements that can be offered;
- Potential to match fund ESF with The People and Communities Fund for a range of projects focussing on pre-employment support;
- Supporting an internal Employability Worker Post, focussing on increasing the number of Link tenants in employment;
- Ring-fencing low skilled tasks like void clearances and stair cleaning within existing maintenance programmes to be carried out by a supervised trainee work force;
- Supporting community groups with which we work closely to enhance their employability interventions.

**Question 9 – What other measures could be taken to reduce the audit and control pressures?**

**Question 10 – Do you have any further comments on the proposals?**

Link has been present at both the Annual ESF Publicity Event on 14<sup>th</sup> May and the SCVO European Structural Funds Conversation in Perth on 20<sup>th</sup> June 2013. At the launch event (and in the supporting documentation for this consultation) there is no identified third sector involvement at the Delivery Partnership level, which has created some debate.

The SCVO event also featured a presentation from the Government's Structural Funds Programme where it was revealed that SCVO and the Chamber of Commerce would now be part of some of the Delivery Partnerships. Although we welcome increased representation from the third sector, we are concerned that decisions are being made prior to the conclusion of the consultation, which we hope will carefully consider the views of all before the final governance arrangements are announced.