

CONSULTATION RESPONSE FORM

Question 1 - The table in part 5 provides an overview of the proposals under each of the EU 2020 headings – Smart, Sustainable and Inclusive – matched against the relevant thematic objective and investment priorities. Do you think the investment priorities are the most appropriate ones for the activity suggested?

Falkirk Council welcomes the approach and content of the draft Programme. The approach adopted is more strategic and this enables closer alignment to the activities of local authorities, Scottish Enterprise and other partners in promoting sustainable and inclusive economic growth across Scotland. The proposed investment priorities match this strategic approach and are well aligned to the themes and actions which require to be pursued in order to achieve a genuine impact.

The Council does consider that more work needs to be done to ensure that delivery of these strategic interventions connects successfully with the implementation of local Community Plans and with other related national priorities including the National Planning Framework 3 document, the National Infrastructure Investment Plan, the Strategic Transport Review and Scottish Enterprise work to promote important industry sectors such as the Chemicals sector. The development of the chemicals sector is vital to Scotland's economy and there are opportunities to connect the delivery of the EU programme with developments taking place to secure and enhance the performance of this sector, particularly at Grangemouth. The Council is working with industry partners in bringing forward a range of opportunities, underpinned by the Falkirk TIF initiative. It is important that the strategic interventions promoted in the plan provide a basis for support to the nationally significant location and the economic potential it presents.

Response to individual investment priorities:

1 Developing Scotland's Workforce

In terms of investment priority we note the potential synergy with intervention 10 "Enhanced Employability Pipelines & Youth Employment Scotland". This is a key area of work for our CPP's Employability Partnership and the Council's Employment and Training Unit which has had considerable success recently in delivering measures to tackle youth unemployment. It is important to ensure close working in the management and delivery of this measure to ensure efficient application of funds. The investment in lifelong learning also impacts directly on Council sponsored Community Learning & Development and Education Service's activities, and we wish to ensure that their involvement should be structured in, especially around the Senior Phase and Transitions Pathways and the links with the Strategic Skills Pipeline.

A key issue is to avoid silo working from national level initiatives being 'parachuted' into local areas. It is important that the implementation of this measure works locally and connects with the work of CPPs to help shape the spend and initiatives undertaken within this strategic intervention.

2 Business Competitiveness

This measure is welcomed and builds on the emerging success of the recent Business Gateway Plus initiative sponsored under the current programme. The investment priority should make specific reference to Business Gateway, for clarity. It is important that the

development of this intervention is wholly aligned with the national service for the promotion of start-up and growth amongst SMEs. The apportionment of delivery between the lead organisations needs further close consultation and it is important that more work is undertaken in early course to consider the alignment and means of delivering these activities. This should include measures to ensure consistent links with workforce development measures and employability programmes.

3 Innovation

While it is difficult to see local authorities as part of the innovation system in terms of direct business support, there is a strong case to see LAs as prime users of RD&I in the development of 'smart, sustainable' services, from social care to waste management to social housing to public transport. The scope for the better alignment between this investment in 'societal issues' and the actions promoted via this measure should be examined. In this respect, the work of the Improvement Agency might assist in engaging with the RD&I agenda on behalf of public services and their impact for business related innovation.

4 Next Generation Broadband Investment

The Council recognises the needs of remote rural areas requiring support for investment in broadband, however it wishes also to highlight the need to ensure that the needs of businesses in towns and cities are met in ways that boost their economic performance. In this regard there should be capacity to offer support for broadband roll-out where it provides a clear and additional economic benefit.

5 Scotland's 8th City – the smart city

The need to promote the use of smart infrastructure applies in a wide range of settings and this should not be confined to cities per se. Investment via this measure should encourage the Scottish Cities Alliance to extend the impact of this work to other local authority areas. Clarity is needed on how the leads for this investment intend to connect with local authorities such as Falkirk to benefit from the pilots, to engage in next stages etc. In this respect the formation of the new Innovation Centre for smart sensor technology is noted and offers a platform for development and roll-out of these measures across Scotland in a variety of industry and environmental settings, not confined to cities.

6 Financial Engineering Instruments

The introduction of this measure is welcomed and the alignment with local authority provision of financial support for business in the integration of measures currently promoted via WSLF/ESIF is particularly welcome. It is important that a strong continuum of support is maintained as a consequence of the implementation of this measure and that this is closely aligned to the business competitiveness measures promoted elsewhere in the programme.

7 Low Carbon travel and transport

The measures promoted under this measure are welcome and the Council supports development of low carbon transport. It is important that the delivery of these is aligned with national transport planning policies. The need to align these measures with projects such as those identified in NPF3 should also be ensured, including the development of Grangemouth as a national freight connection hub which offers potential for the promotion of low carbon measures amongst logistics operators. The potential to assist the means of transition to low carbon fleets for organisations showing direct economic benefit should also be explored.

8 Low Carbon Infrastructure Transition Development Fund

It is important to align the delivery of this element of the programme connects with the delivery of key national economic priorities which will make a substantive contribution to

boosting economic growth. The projects identified in the new National Planning Framework will require support in their delivery and there is a need to note in particular the requirement to support strategic priorities conveyed in the new framework such as Grangemouth Investment Zone where the area's economic potential as a hub for chemicals, manufacturing and logistics is highlighted and underpinned with the delivery of the Falkirk TIF. We wish to highlight that this is an important national priority which will promote low(er) carbon usage as well as aiding national economic recovery. The potential for connection to national pilot's initiatives such as TIF should be made in the programme offering the potential to match fund and aid delivery of such projects.

9 Resource Efficient Circular Economy Accelerator Programme

The Council considers this to be a key development within the programme and welcomes the opportunities for this important strand of activity to develop at this point in time. There are significant business opportunities in this sector to be grasped and scope to boost the collaboration amongst Council's waste services and with related business support bodies. In this respect the Council welcomes the formation of Resource Efficiency Scotland and will work closely with the organisation to ensure that business benefits from resource efficiency are gained. The scope for the programme to assist the delivery of these measures is welcomed and more work should be directed towards delivery of this approach including definition of roles for e.g. Business Gateway partners. The potential for collective action, as witnessed through measures such as Business Improvement Districts (BIDs) should be built upon.

10 Enhanced Employability Pipelines & Youth Employment Scotland

The introduction of this measures is welcomed and it is important that CPPs are supported to enable consistent and coherent application across Scotland. There are clear links with other Strategic Interventions and these priorities still need to be established in further details. As this is a key area for clarity with partners regarding alignment, connectivity and management there is a need for early action to consider its alignment and delivery arrangements in some depth.

11 Poverty and social inclusion

This is a key strand which remains subject to some uncertainties. Local Authorities, through CPPs are ideally placed to work across agencies, and with the local Third Sector, to deliver interventions to prevent social inclusion. They can give leadership at local level in designing and integrating measures which are designed to have a lasting impact on poverty and exclusion. The Council considers that this fund should be managed through CPPs in a similar method to the Employability Partnerships and should integrate with local anti-poverty strategies and measures relating to welfare reform. The scope to align mainstream investment with new activity promoted via these measures must be examined. Activity taking place on employability, welfare reform and anti-poverty strategies has potential to contribute to development of this priority.

An intervention such as this should have significant positive outcomes for equalities work. In particular there is a need for this priority to assist in delivering measures to stimulate Supported Employment and the development of Supported Business. The Public Social Partnership (PSP) model offers to be a useful delivery mechanism for measures in this field.

12 Scottish Regeneration Capital Grant Fund

While welcoming this strand of activity the Council wishes to emphasise that the scale of investment promoted through this measure must be sufficient to make a significant impact. Regeneration requires a lasting and significant resource commitment. If spread too thinly it does not offer sufficient benefit. In this respect it is important the design of this measure aligns properly with the Scottish Government's recent Town Centres Review. There should

also be a clear alignment with Community Benefits and other strategic priorities e.g. business growth, employability, inclusion and sustainability.

13 Green Infrastructure

The Council is supportive of this investment priority and is working with SNH and other partners to aid its delivery. It is important that its impact is not dissipated and the scope to align its implementation with related regeneration, inclusion and economic impact measures is demonstrated. Links with community benefit projects via training and employment initiatives as per existing activity on core path networks and other key local projects in Falkirk

European Social Fund

We note the need for more work to be undertaken on the alignment of Investment Priorities for ESF, particularly in relation to the measures for employability and social inclusion. We wish to alert that the forthcoming results from the Wood Commission on developing Scotland's young workforce will increase the relevance of these measures especially for senior phase and transitions activities within secondary schools.

10% Rule - eligibility

We would like to explore the potential for the use of the 10% rule with the Youth Employment Guarantee Scheme to include Falkirk which is within the top 10 of local hotspots with problems of youth unemployment.

Question 2 – Section 6 sets out the linkages between Structural, Rural and Fisheries Funds as well as linkages to other EU Funding Programmes. We would welcome stakeholder comments on these linkages in order to help us develop this thinking further

We welcome the rationale developed in section 6, highlighting policy synergies between funds, but note the lack of detail in how achievements of such synergies are to be recognised on the ground

Question 3 - Do you think the new proposals will have a positive or negative impact on the protected characteristics and wider issues of inclusion and participation?

We welcome the approach suggested and consider that they should have an overall positive effect within the context of employability and workforce development. The impact of welfare reform and the growing importance of in-work skills development to increase income earning capacity should be aligned with both the 'Poverty and Social Inclusion' Strategic Intervention but also has implications for several other interventions e.g. 'Developing Scotland's Workforce'.

The areas where there is the potential for impact on inclusion and participation are under labour market mobility, social inclusion and combating poverty, and education, skills and lifelong learning. Labour market mobility raises some key equality related issues e.g. for disabled workers, older workers; childcare; health inequalities, skills and employability.

Some consideration should also be given to women's access to the labour market and the implications this has for affordable childcare as well as access to affordable and accessible transport in order to help people be able to take up employment opportunities. As part of the thematic objective on labour market mobility it is suggested that developments should

link closely to SME development. Recent UK research suggests that “women’s unemployment has continued to rise, while men’s has decreased overall.” This is in part as a result of the impact of public sector austerity and reducing staff numbers where women make up the majority of employees in local government; schools and the NHS. Recent figures from ONS report that people working in the public sector make up 18.8% of the workforce which is the lowest percentage since reporting began in 1999. The ONS report also indicates that the numbers of people working 2 or more jobs has also risen; 4.7% are women while 2.8% are men indicating that there may be lower – paid part-time jobs available rather than full-time jobs; resulting in people working in more than one job.

Any expectations that the SME sector will fill the gap needs to be supported by action to make the SME / private sector accessible to women and others from equality protected characteristics e.g. disabled people; young people and older people. In looking at the other thematic themes action to improve access to jobs will need to be supported by employers doing more to attract women, disabled people; young people and older people while at the same time offering greater access via education, skills and lifelong learning opportunities which encourage women into more non-traditional work areas; disabled people into employment and continuing employment opportunities for younger and older workers.

In terms of whether the impact is positive or negative a lot will depend on whether supportive action to address the issues identified can be resourced and put into place.

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Question 4 - If you think there will be a negative impact on the protected characteristics or inclusion and participation please provide suggestions as to what could be done differently to diminish this impact.

The Council considers that the programme can have a positive impact on meeting the protected characteristics or inclusion and participation. The following measures might assist in ensuring this is achieved:

- Public sector procurement can be used to:
 - Influence the private sector and SME’s to demonstrate good employer practice in wage levels, equalities etc.
 - monitor equality data and pay differentials.
- Promote awareness of progressive work practices
- Develop workforces so that skill development becomes the working norm for individuals and the employer.
- Creating supportive pathways and resilience development programmes.

Question 5 - Please provide your views for improving the process for design, procurement, delivery, monitoring and evaluation to strengthen delivery of sustainable development.

The Council supports the approaches suggested in the draft Programme to assist delivery of sustainable development. The alignment of the programme with national and local strategies for community planning and sustainable economic development should help ensure that the programme meets these objectives. The draft programme does give a balanced approach, however dedicated measures will undoubtedly be required. The Council has had specific success with measures adopted via e.g. community benefits in procurement and these can assist in ensuring further success in meeting sustainable development objectives.

Question 6 – Do you have any further comments on the proposals outlined in this document?

1. Falkirk Council confirms its support for the draft programme and welcomes the strategic approach and reduced fragmentation that it promotes. We consider that this strategic approach needs to be followed through consistently with robust governance and delivery arrangements, ensuring clarity of roles for each agency and partner involved.,
2. There is still some lack of detail to the programme's content and much more work to be done. In this respect the continued involvement of local authorities, particularly in their local strategic role in the development of this further detail is crucial to its success. The programme should assist in achieving a clear alignment of policy, EU-Scottish-Local and effort should be directed towards ensuring this alignment more overtly at the outset of the programme and as a means of aiding effective delivery of the measures it contains.
3. It is important in particular to align the programme with delivery of National Planning Framework priorities (coming forward in NPF3) and the national infrastructure plan. There is a need to note in particular the requirement to support the strategic priorities conveyed in this national framework – e.g. Grangemouth Investment Zone. This zone is an important national priority, which will promote the low(er) use of carbon as well as aiding national economic recovery. Falkirk hosts the national TIF pilot initiative, and there is potential to use structural funds to match fund and aid delivery of this project.
4. We welcome the inclusion of sustainable transport measures – but suggest that in view of the potential considerable cost of such projects the alignment of sustainable transport measures and the programme's wider economic objectives needs to be made evident.
5. We acknowledge the importance of addressing social inclusion – local authorities/CPPs are ideally placed to develop locally-managed third-sector/public sector interventions for supporting people who have equality-protected characteristics. In particular we wish to highlight the importance of meeting the needs of those who are disadvantaged in the labour market and the potential to

support e.g. measures which will assist delivery of supported employment which can help the most disadvantaged.

6. We welcome the involvement of LAs in the SDPs to date. There is still a need to confirm the details of the future approach for Delivery Partnerships in terms of delivery and the governance of /accountability for funds. We wish to highlight the role of existing delivery mechanisms, such as the CPPs in aiding delivery. .
7. More information is needed on how the fund allocation process will be undertaken. Related to this it is important that work to clarify the role of lead partners is undertaken ASAP. There is little detail on how partnerships will be constructed and this needs to be transparent, equitable and effective in securing contributions to sustainable, inclusive economic growth.