

## 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?

Inverclyde Council acknowledges the significant input by all stakeholders in identifying activities and priorities (Part 5) within a particularly short timescale. The recognition of sustainable transport in the 2014-20 programmes is also to be welcomed.

Nevertheless, some of interventions are more detailed than others therefore further development of these is necessary. There are a large number of investment priorities and it may be necessary to minimise the scope of these, given that financial allocations need to follow them.

It appears that many of the interventions proposed are a continuation of existing activities and therefore requires to be backed up by results from evaluations. Further, the evaluations should be up to date to meet the current needs of SME's for example.

Interventions on anti-poverty and promoting social inclusion need to be aligned to local employability pipelines. Early stage pipeline activities relate to personal capacity building and could be considered as social inclusion measures. Local authorities as well as the Third Sector have a great deal of experience in this area. CPP's, in particular, have extensive involvement in tackling financial inclusion through supporting clients to maximise household income and benefit entitlements and to make work pay. Support is also provided for Credit Unions. The Local Employability Partnership model can be further developed to tackle anti-poverty allowing greater alignment with our Community Health & Care Partnership.

Inverclyde Council is aware that there is a substantial notional overbid for resources. No one yet knows, even indicatively, the allocations to these themes therefore it is unlikely that all activities will be delivered.

**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

The SRDP appears to be more developed than the structural funds and operating to a different timescale. Unlike the structural funds, the SRDP has monies allocated to it which includes funds for business support. We are of the opinion this should be integrated with support via Business Gateway and Scottish Enterprise to SME's. Programmes need to complement, rather than compete with, each other.

The proposal for a single portal for EU funds is welcome and Inverclyde Council is hopeful that Scottish Government will actively support its development.

**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?

Inverclyde Council anticipates that many of the proposed interventions will have the objective of addressing social and economic inequalities.

It would have been helpful to have a link to the EIA referred to on page 26 of the consultation document.

**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.

Those leading the intervention need to be challenged as to the impact in relation to reducing inequalities and if they are meaningfully addressing the horizontal themes. Monitoring is essential.

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

A link to the Scottish Natural Heritage study on mainstreaming sustainable development and information on the main conclusions of the study would have been helpful.

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

- A draft Scottish Chapter of the UK Partnership Agreement should have been made available. The only available Partnership Agreement is dated October 2013 and it would have been helpful to know how this has changed. This would allow stakeholders to provide feedback as to the key issues that such documents should contain.
- Inverclyde Council would like to see more explicit spatial targeting in relation to the proposed interventions.
- It does not appear that any evaluations have been used to inform the current programme and we are of the opinion that this would be a useful exercise.
- Inverclyde Council would appreciate the opportunity to comment on the Operational Programmes prior to the documents being finalised.

- Work has been carried out by some Local Authorities on a simplified costs model and presented to Scottish Government however we are disappointed that there has been no progress on this matter.
- Some activities, such as those under Social Inclusion and Local Development may be delivered and managed at the local authority level as there are already established labour market areas for the Local Employability Pipelines. Existing structures should be utilised, such as the Business Gateway Network, rather than establishing new structures.
- Regarding the governance of the new programme, representation across geographies and sectors is desired. Further, each sector should decide on their own representation. Information on the delivery of the programme requires to be disseminated widely and we would suggest that an updated Structural Funds website would be a good way to allow for this.
- Inverclyde Council is disappointed at the lack of information around the additional funding via the EU Youth Employment Initiative, particularly when this was confirmed in May 2013.