

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?

In broad terms the priorities proposed appear to represent activities that fit with the EU 2020 headings. Any flaws with the activities may result in part at least from the process by which they were developed and the tight timescales around their development.

Some of the priorities are better developed than others, for example information on Low Carbon Transport Hubs is quite specific in comparison with that on the Low Carbon Infrastructure Development Fund.

With regard to Low Carbon Infrastructure it may be worth noting that a high proportion of buildings in use today will remain in use in future and therefore specific activities around making these buildings more efficient may be worth consideration.

While accepting that the detail of the activities will be written in the Operational Programme, the table would benefit from more information and less jargon, e.g. what is “eco-innovation”? Access to any current draft of the Operational Programme may have facilitated a fuller response to the consultation in terms of the activities proposed.

With regard to the possibility of activities around social inclusion it is averred that Local Authorities too have strengths in this area, particularly through some of the work done at various stages of the current employability pipelines.

RESPONSE FROM WEST DUNBARTONSHIRE CPP EMPLOYABILITY

Would agree that under the Inclusive growth: Proposal 10 EEP&YES are the most appropriate for local delivery. However decision making at Local level regarding actual interventions must be retained.

Proposal 11 Reference the significant challenges faced due to the changes to UK Welfare Reform and introduction of Universal Credit should be considered in relation to development of delivery of Poverty & Social Inclusion proposal. It should be noted that not all LA's have the required third sector expertise or presence within their area. Would suggest that CPP's/LA have a role in ensuring any interventions which are introduced are strategically aligned to local action plans and needs to ensure value for money and effectiveness.

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

Linkages between the Structural funds and other EU funding programmes should aim to

ensure complementarity and eradicate duplication. With different Funds being at different stages of their development this may be more difficult to achieve.

It is unclear whether the level of integration of the funds which seemed possible at the outset of the process of developing the new Programmes will be achieved.

The development of the One-Stop Shop for the various funds is welcomed.

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?

In terms of the protected characteristics the consultation document references an Equalities Impact Assessment. The findings of the EIA will be useful in informing a response to this question.

In broad terms some of the Interventions and activities proposed should by definition have a positive impact on wider issues of inclusion and participation, for example, the social inclusion activities envisaged at Part 5, section 11.

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.

It is thought that the Equalities Impact Assessment mentioned above and any subsequent similar exercises required as part of the process of finalising the new Programmes will help address any such issues.

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

More rigorous monitoring of the outputs and impacts of activities should help strengthen the delivery of sustainable development.

As previously mentioned, the availability of ancillary documents, in this case the Scottish National Heritage work referenced at page 27 of the consultation, may have allowed a more constructive and informed response to this question.

RESPONSE FROM WEST DUNBARTONSHIRE CPP EMPLOYABILITY

Need clarity on the process for awarding of funding. I.e. application or allocation.

Page 29, paragraph 9 contradicts current expectation of allocation of funding rather than application process.

Funding for the CPP Employability Pipelines is provided through ESF, ERDF and Local Authority/ Partner match funding. Employability pipelines are organised at local level to meet the needs of the local community and gaps in provision within the Council area.

It is vital that the council continues as a delivery agent, taking decisions at local level across operational and project areas, to ensure continuation of a range of highly successful interventions.

As referenced in next steps within the consultation document, the content of the Partnership Agreement needs to be clarified as well as how Local Authorities and CPPs can be involved in SDPs and who will be considered as Lead Partners. The proposals need to be practical for CPPs or LAs as each council is a distinct legal entity. Reporting structures and responsibilities Legal and otherwise of Lead CPP and Strategic Delivery Agents require clarity.

It is not clear from the consultation document how the SDGs would operate in practice and at what geographical level.

There is a significant risk that the proposed arrangements and changes to the governance and delivery model including commissioning of provision and proposals for simplified costs and unit costs has been designed for ease of administration rather than for effectiveness and impact. It is vital that financial flexibility and decision-making is retained at local authority level.

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

In general terms there is insufficient detail contained in the document about many elements of the new programmes to allow a fuller, more constructive response than has been given. This is particularly the case in relation to the following areas:

Finances of the new programmes – Indicative allocations of the funds across the themes at the least and a more detailed breakdown across the priorities proposed at Section 5 of the consultation document would have been useful.

Governance structures for the new programmes – More information about how the structures will be set up and populated is necessary.

Strategic Delivery Partnerships/Role of Lead Partner – The Strategic Delivery Partnership/Lead Partner model envisaged may work in the case of potential Lead Partners who are bodies with a national remit and budget, e.g. Scottish Funding Council, Skills Development Scotland. It is more difficult to see, certainly from the consultation document, how this model could work for potential Leads with a local remit and budget, e.g. Local Authorities, Community Planning Partnerships.