

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?

The investment priorities identified seem appropriate and fit for purpose. If anything certain investment priorities are mutually re-enforcing ie under developing Scotland's Workforce c iii and c iv, there is a strong correlation with 10) Enhanced Employability Pipelines and Youth Employment Scotland as programme participants, at some distance from employment will need the skills for a modern workforce to make the transition into sustainable employment.

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 rationale for the linkages between funds seems reasonable in section 6 based on what is known so far. What it fails to take into account is that Scotland is not split simply into urban and rural areas, there are a number of areas of disadvantage, particular former industrialised and isolated communities such as ex-coalfield areas that have characteristics of both and this should be factored in so they keep pace with the developments in other areas. There was some success with this under the leader scheme in the current programme.

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?

If the new proposals enable a degree of flexibility to be applied to address the complex needs of certain disadvantaged groups and communities the impact will be positive under both inclusion and participation. This will be tested in practice when a suite of needs are presented for support that address multiple needs of communities of place and theme that need support from a range of investment priorities.

The potential negative impact is if we think in silos and only address one dimension of the set off complex needs.

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.

As stated at the end of question 3 it needs to be made clear that the range of complex issues affecting certain disadvantaged areas will be available to be addressed through different investment priorities if the lead bodies and delivery agents can work better together knowing there is a frame work of investments flexible enough to respond to complex needs.

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

The ethos of genuine partnership working, equity of sectoral participation and transparency needs to be far more tangible to improve design, procurement, delivery, evaluation and strengthen sustainable development

Lead partners such as CPP's, should be charged with having not only robust cross sectoral representation and operating to a common format of consultation and engagement, but should be required to demonstrate they are making the best use of available expertise in their area to jointly develop and agree how investment priorities will be delivered and how successful intervention will be sustained beyond the scope of ESIF.

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

As a third sector organisation with many years experience of engaging and successfully delivering structural funds there remains two consistent issues not covered by this document.

- 1) Firstly, although much can be done to simplify the audit processes and burdens, to enable focus on service delivery, almost nothing is stated about improving on payments delays and front loading costs such as advance payments, these need to be seriously considered to avoid the terrible cash flow delays and subsequent planning impacts incurred in the current programme
- 2) Secondly, is being engaged with strategic delivery partners in the design and implementation of the programme, we must move away from the token representation of the third sector in many areas and capitalise on the expertise that exists and draw on the lessons learned as we head towards the mid-programme review, rather than drawing them together at the end, when there only influence is to help shape any future intervention. Some element of supporting sector capacity to be more fully participative should be considered either as an eligible cost or a discreet funding source.