

CONSULTATION RESPONSE FORM

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

We understand that the European Commission is keen to encourage wider use of Community Led Local Development as a way of distributing EU funds based on the greater effectiveness of funding administered in this way, greater accountability, and greater involvement of businesses and communities. We would concur with the Commission's assessment of the effectiveness of CLLD which is strongly evidenced in our current Forth Valley & Lomond LEADER Programme, as well as our previous Lomond & Rural Stirling LEADER+ Programme.

As an established 'LAG' (Local Action Group) and a strong working relationship with the local communities and businesses in our area, we would be interested in extending our LEADER way of working to other EU funds such as ERDF and ESF, as well as assisting the 3 more urbanised parts of our area (we have a 'Swiss cheese' geography) to develop an urban LAG to deliver ERDF/ESF in a CLLD manner, working together to agree our Local Development Strategy and assessing projects locally (we have had early stage discussions with our partners in Stirling, Clackmannanshire and Falkirk).

We therefore think that the Partnership Agreement should make it clear that Community Led Local Development will be a key mechanism for the distribution of EU funds in Scotland for the 2014-2020 period – based on the 3 themed funds identified.

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

Whilst the objectives proposed sound appropriate, we think it would be a mistake to remove Capacity Building and Sustainable Transport – as support for both of these are much needed in Scotland in the short term and the long-term.

Building capacity within businesses and communities to maximise the potential of economic and business opportunities as they arise is much needed in Scotland – this requires learning new skills, new experiences, new horizons, greater confidence – all at a business level (as opposed to at the individual level) – and it is business growth that will create jobs. It is also important to acknowledge that not all skills acquired are evidenced by an SVQ to prove it.

In this current climate of austerity, the need to find ways of making transport more sustainable is much greater than ever before. It's not about substituting one type of funding with another, but exploring ways to make our transport more sustainable, or coming up with new low carbon transport solutions. This is an issue that affects the more rural areas in particular due to rural routes being less attractive to commercial operators. Given that one of the proposed Scottish themed funds will be focussed on Low Carbon, it would seem paradoxical to remove sustainable transport as an objective here.

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

Capacity building and sustainable transport – for the reasons given above.

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

We think that the identified themes are broadly the correct themes, however we strongly believe that without incorporating Community Led Local Development as a method for distributing funds, then this will severely limit the Scottish Themed Funds' ability to address the challenges.

In terms of gaps in the list of eligible activities, it is unclear why vocational training has been restricted to just agriculture, forestry and fisheries sectors, when there are clearly many more economic sectors (including tourism, resource management, low carbon economy, digital skills, etc) that offer employment and business growth potential in Scotland.

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

Reading the consultation document, it is concerning that the proposed delivery has been designed for ease of administration rather than for greatest effectiveness and greatest impact – the best solutions aren't always the easiest options at the outset – especially those that involve some preparatory work or wider societal engagement.

The model proposed as it stands is extremely limiting. The focus on Strategic Development Partnerships made up of a limited number of lead partners able to identify and match fund a small selection of large 'operations' at such an early stage will exclude a large number of stakeholders, and even local authorities, from accessing or being involved in the next programme of ESI funds.

The model proposed penalises those areas or stakeholders who aren't of sufficient scale or don't currently have sufficient resources to invest in the preparatory work required to have strategic projects ready at the start of the programme. With just one chance to bid for the funds available (at the start) the model will favour national organisations or the more affluent organisations, which surely is not the intention.

We believe that the exclusion of Community Led Local Development method of delivery would be a mistake because of the many projects and people that would no longer be able to benefit. Whilst CLLD is about communities taking the lead on developments that directly affect them, and also to be involved in delivering solutions

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

Despite being told that LEADER will be part of the new programme of funding, it is difficult to see how it will 'fit' within the proposed structure – so it disappointing to see no reference to LEADER in the proposal document.

If LEADER and the LAGs are just tagged on as an after thought, there is a risk that the full potential of LEADER and the LEADER way of working will be missed.

If LEADER and the LAGs are included from the outset, then it would be possible to use these existing structure in a very innovative and flexible way. LAGs already work closely with the CPPs (our LAG works with 4 CPPS), LAGs operate across multiple area boundaries, have track records of bringing partners together (agencies, businesses and communities), have rigorous audit procedures in place and have the buy-in of the areas they represent. LAGs also have experience of delivering other funds than just LEADER (eg Broadband Challenge Fund and Community Services and Facilities funding).

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?

Yes – we believe that Community Led Local Development – along the lines of LEADER Local Action Groups which currently operate in the rural areas only are good examples of genuine partnership and strategic working to great effect in terms of impact in the areas they cover.

Currently the Local Action Groups only draw down LEADER funds from the SRDP – but they do have experience of managing other funds too (Rural Broadband Challenge Fund and Rural Priorities Community Services and Facilities). Due to the make up of Local Action Groups where at least 51% are community or business members and 49% are public agency representatives, a wide and representative range of knowledge and skills sit round the table to discuss area wide issues and to appraise projects (projects are appraised according to specific criteria and contribution to the Local Development Strategy).

If the Local Action Groups were able to draw funds down from each of the Themed Scottish Funds, according to the needs and objectives of each project coming forward, then the Local Action Group (and the officers supporting it) can ensure perfect complementarity between the different Structural Funds.

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

Community Led Local Development (CLLD) is an effective way of finding local solutions to local issues. It isn't currently employed within the Structural Funds, but there is no reason why it can't be for the next programme of EU funding (and indeed is being encouraged by the European Commission). There is also the advantage that the organisations which have most experience of managing CLLD delivery are the same organisations that work with young people and are constantly looking for employment solutions (ie Local Authorities) and already work closely with the organisations who work with young people.

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

Clear technical guidance and training of operational staff from the outset is crucial to ensuring audit and control pressures are met. It is also important the ‘re-interpretations’ of the EU regulations do not happen on an ongoing basis which has happened in the current LEADER programme, which has weakened the integrity of Scottish Government’s administration of EU funds.

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

It is slightly concerning that there seems to have been little dialogue between the European Structural Funds team within Scottish Government and the Rural Funds team within Scottish Government, as even after going through both consultation documents in detail, it doesn’t sound like both are proposing the same delivery structure or way of working.

We understand that the Structural Funds team are keen to remove the ‘Challenge Fund’ way of working - which we think would be a mistake – whilst the Rural Funds team proposals include a number of schemes that do follow a Challenge Fund way of working (in some respects, LEADER could be described as a Challenge Fund of sorts).