

CONSULTATION RESPONSE FORM

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

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

We are concerned that there is a particular challenge facing rural Scotland in the long-term decline of rural communities, particularly remote rural and small rural towns. This decline is characterised by the contraction and withdrawal of private and public services, the exodus of young people in search of employment and further education opportunities, the lower wages combined with higher living and housing costs faced by rural dwellers, and a struggling private business sector. The Scottish Government's policy of 'mainstreaming' Rural means that rural issues ought to be addressed by all 3 funds, but there is a danger that the rural dimension gets lost in the process. What is needed is a recognition that different approaches are required for rural issues and one solution rarely fits all.

should be addressed?

We note the European Commission's particular emphasis on Community Led Local Development (CLLD), and the consultation's reference to an ageing population in remote rural areas. In the light of this, we would like to see a thematic objective which specifically tries to address the growing disparity in expectations and opportunities between urban and rural Scotland – above and beyond Broadband provision. A thematic objective which supports CLLD such as; *Rural Regeneration* or *Rural Opportunities*, would seem to us to meet this need.

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

Yes, as long as we are able to fully engage the energy and effectiveness of Third Sector and civil society organisations imbedded in Scotland's communities.

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

We are concerned that the governance arrangements as proposed do not encourage input from Third Sector organisations, and civil society generally. The proposed SDPs are dominated by government bodies, with civil society representation limited to Community Planning Partnerships in conjunction with Local Authorities. CPPs have had a mixed record of engaging with the Third Sector meaningfully, and cannot be relied upon to represent the full range or breadth of civil society. We do not think that this approach accords sufficient regard to the experience and insight of the third sector, community organisations or indeed private business. Each SDP should include at least one significant national organisation representing Third Sector/Civil Society interests – including private business.

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

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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?

It is critical that delivery is not limited to a small number of large contracts to large organisations, however attractive this may be from an administrative and governance angle. This approach would not unlock the most effective or sustainable outcomes from the opportunity presented by the structural funds.

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

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

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

For Scotland to maximise the potential of the next round of ESI's it is essential that the Third Sector and civil society in its full range and breadth, participates in the design, governance and delivery of the funds. We acknowledge that there will be practical constraints on the number of organisations which can have a place on the governance bodies (PMAC and SDPs), but it is essential that each of these includes at least one organisation which can represent the full spectrum of the civil society organisations. We fervently believe that only in this way can the outcomes be long-lasting and truly structural.

It is also important that the distinct needs of rural Scotland are factored into all 3 funds, as it can be easy for this to be overlooked when there is a focus on high growth business in high growth sectors, or big (numerical) impacts, which can often end up focussing on large populations in urban centres.