

CONSULTATION RESPONSE FORM

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

Having a specific Scottish Partnership Agreement would be very welcome and should help in focusing on specific Scottish issues and solutions. However, given the EU and UK Government restraints this process is being developed within, and the potential complexity of the suggested implementation arrangements, there needs to be much more detail provided before there can be any confidence in how the Scottish Partnership Agreement would or could work. In addition, how this would then be properly reflected in the UK partnership agreement is of concern. Scottish priorities must be properly replicated in the UK PA in order to avoid issues of ‘interpretation’ at any time in the future.

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

Again, the choice of themes has been restricted by EU and UK priorities (as well as previous stakeholder consultations) and therefore they cannot be expected to fully reflect the Scottish needs as considered by local authorities and the like. Climate change, sustainable transport and capacity building are important omissions in this regard.

However, Renfrewshire Council does consider the draft themed funds provide considerable scope to address many of the local issues and can only welcome this. Just how the thematic objectives translate into successful projects (both in terms of their implementation and audit regimes) which can impact on Scotland’s short- and long-term challenges has yet to be seen.

As an aside, there is a need to consider the overlap of interventions in the thematic objectives across the themed funds. Duplication should be avoided unless there is a clear understanding that the repetition is for the purpose of increasing the flexibility of the funds. Just how that flexibility can benefit projects and their impacts needs to be explored particularly in light of the ‘pipeline’ approach being promoted for certain strategic objectives.

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

As mentioned previously, the omission of sustainable transport and capacity building is a serious shortcoming. It can only be hoped that the later in particular can be addressed as a ‘horizontal objective’ with additional funds being made available to meet this need in Scotland.

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

The menu of themed funds is far from comprehensive and therefore cannot be expected to address all of Scotland’s key challenges. In addition, the lack of detail behind the specific interventions in the funds causes uncertainty. However, financial flexibility and decision-making at a local authority- or partnership authority- level would help ensure that interventions best match local need.

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

Renfrewshire Council does have concerns as to the extent to which the proposed governance and delivery arrangements are practical. In particular local authority financial resources are not held centrally but instead are allocated to the 32 local authorities. Moreover each LA has a distinct legal personality. This makes it difficult to fulfil key responsibilities for SDBs

Due importance should be given to the increasing centralisation associated with the governance and delivery arrangements under consideration. Based on the experience of the LUPS wide PMC for ERDF and ESF programmes a further expansion to include maritime and fisheries programmes across the whole of Scotland, as an example, is likely to dilute scrutiny, transparency and accountability. In this regard, H&I would benefit from having a distinct operational programme which would allow some functional as well as financial differentiation within the common thematic objectives. The investment priorities should be set differently to reflect the challenges posed by regions uniquely peripheral, insular and sparsely populated in nature.

Renfrewshire Council welcomes the opportunity for local authorities, CPPs and the like to be potential lead partners in the 3 strategic delivery partnerships if certain conditions can be built into the process which support: proper and effective local representation and decision-making; the strengthening of existing collective working between organisations; the development and support of local capacity to manage the process; a clear line of political accountability; and acknowledgement of responsibilities being reflective of the risks bestowed. Local Authorities are well placed to help realize all these necessary conditions despite the fact that certain financial and legal obstacles still exist in doing this quickly and effectively. There is also considerable experience in local government of working effectively with strategic delivery partners e.g. the Clyde Valley Community Planning Partnership (CVCPP) which has brought together 8 local authorities under a common purpose. It is in building on these kinds of collaborations that the governance and delivery arrangements for the new Structural Funds Programme can be best met.

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

The governance and delivery model as proposed is top down and centralising in nature. There is a significant risk that the proposed arrangements will exacerbate the sense of disengagement with EU structural funds that is felt by many organisations. In moving to the next set of programmes a great deal needs to be done to improve and ensure transparency, accountability and decision-making in the process. The full impact cannot be assessed until greater detail is provided in terms of the legal, financial, and audit and compliance responsibilities that may be placed on lead authorities – only then can informed decisions be made regarding engagement in the process and the impact on organisations doing so.

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 important that, rather than creating new structures, existing approaches to governance and delivery that have been shown to work should be built upon. For example, the CPP employability model demonstrates strategic partnership working effectively and inclusively at a local level. The CVCPP, as mentioned in Question 5, also points to the success of existing partnerships in delivering strategic objectives, and in this case across 8 local authority areas. It is clear that there are various good examples of effective strategic partnership operating across Scotland which should be considered as forming an effective basis for moving the ‘simplification’ objective forward.

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

Renfrewshire Council is of the view that full use should be made of existing structures which work well. Measures to boost youth employment should be integrated into strategic employability pipelines rather than standing outside them. Dealing with long standing youth employability problems requires a multi sectoral, holistic approach that covers both demand and supply side interventions. Such interventions also have to be viewed in the local labour market context and should therefore be routed via local skills pipelines.

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

Given the wide range of evaluations of these areas already underway Renfrewshire Council is of the view that the outcomes of these should be more fully considered to ensure that ‘simplification’ is real and manageable. The audit requirements must be made clear from the outset to allow adequate processes and procedures to be developed and documented. Only then can the various obligations being placed on delivery bodies be properly evaluated and accounted for. The audit and compliance regime will change significantly if the current proposals are implemented and the capacity of organisations must be improved to cope. The use of technical assistance support awarded to delivery organisations would be essential.

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

It is worthwhile emphasising again some of the key factors in the progress of this proposal which might impact on its effectiveness and ‘simplification’.

Renfrewshire Council considered the make-up of the recently established SDP shadow group to be less than fully representative and would argue for its reformulation taking into consideration the roles and responsibilities which are likely to fall to local authorities, CPPs, and other major stakeholders. Ensuring the widest and most appropriate contributions in this process at the earliest possible time will be critical to its future success.

Over the past few years local authorities, on behalf of CPPs, have been delivering significant employability support through their various strategic employability pipelines. This approach has proved to be effective and efficient and has resulted in strong local partnerships focussed on addressing a range of barriers to employment. If local collaboration, reduction in duplication, increased flexibility, and cross-sectoral partnerships are to be central to the delivery of the new programme this work should not be lost but built upon. As one minor example, bringing the delivery of the new youth employment support into this framework would make a lot of sense.

The changes being proposed will have significant impacts on some organisations especially in relation to the audit, compliance and legal framework this will take place within. The lack of clarity has created legitimate concerns to be raised and Renfrewshire Council would ask for this situation to be addressed as soon as possible. Consultation and dialogue must be an early and ongoing part of this process. Risks and responsibilities must be fully explored before any real commitment can be given to the proposals as does the capacity of organisations to deliver and financial capability of local authorities to match fund a significant part of the new Programme.

Renfrewshire Council is pleased to have had this opportunity to express a view on the Scottish Government’s proposals and would welcome an invitation to become much more involved in exploring the detail behind the proposals and establishing the processes and procedures necessary to deliver the aims and objectives of the new Structural Funds Programme in Scotland.