

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?

Renfrewshire Council is aware that there has been significant time and commitment invested by colleagues across all sectors to develop the list of proposals in table 5. This work has resulted in a good range of strategic interventions and overall Renfrewshire Council is supportive of these proposals.

However, Renfrewshire Council is concerned that the proposed interventions appear to be at different stages of development, with some much more detailed than others. In particular, the absence of any detailed information on delivery structures under some interventions means it is difficult to comment on detail.

While the interventions proposed seem appropriate, there is limited justification for these choices. In essence it appears that the programme is being developed in reverse, with interventions being developed as the basis for the operational programme, rather than in response to the identified needs of the Scottish economy. There is also little or no reference to evaluation of interventions currently being delivered and now being continued into the new programme.

Renfrewshire Council is supportive of the 'Poverty and Social Inclusion' intervention, but as this proposal is in development it is difficult to comment further, other than to say that a significant amount of work in this area is already funded by local authorities or via the local pipeline. Any defined intervention should complement existing activity and encourage a cross-sectoral approach aligned to pipeline activity. Renfrewshire Council recognises the expertise of the third sector in this area and currently supports early stage pipeline activity through third sector providers.

The Enhanced Employability Pipelines intervention is to be welcomed, but the absence of any information on delivery structures at this late stage is extremely concerning. Scottish Government has not taken on board the views of the local authorities on the potential complexity of merging CPPs under a 'lead'. Given that a partnership approach is still being pursued further information on delivery structures is required as a matter of urgency.

Finally, the lack of definitive financial information prevents any assessment of the appropriateness of each intervention and the likely scale of activity that will be generated.

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

Renfrewshire Council welcomes efforts to align EU funding, however we also note that rural funding is already working to a different timescale than the structural funds. In Renfrewshire we would hope that the funds are structured to allow access to business support for rural areas from across the funds.

The promotion of complementarity should avoid duplication and increase the likelihood of achieving greater impact from EU funds, however further details on the programmes and how they will operate is required before comment can be made on how practical this is likely to be.

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?

It is difficult to say at this stage the impact the new proposals will have. As previously stated a number of proposed interventions are continuation work, but there have been no evaluation involved based on the information provided in the consultation document.

Renfrewshire Council assumes there is a positive intention to increase inclusion and participation, but it is unclear how this will be achieved. The proposed intervention related to combating poverty and promoting social inclusion is vague at present.

Renfrewshire Council welcomes the comments regarding the need to retain a focus on horizontal themes, but would like more clarity on the 'twin track' approach. The existing Renfrewshire pipeline has noted the requirement for specific targeting to reach some groups with protected characteristics.

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 per Q3 Renfrewshire Council would be keen to see specific allowance or allocation for targeted, discrete programme for particular groups, disabled people, older unemployed people etc.

Public sector sponsors will be bound by the Equality Act of 2010 to meet mainstreaming equality standards. While mainstreaming is to be encouraged, it has seemed in the past that this is more of an issue in project applications than in the operational phase of many projects. A more proactive approach to diversity is crucial. It will be insufficient to merely design projects to be accessible to all, rather projects should encourage wider participation.

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

There is limited information within this section of the consultation document. Renfrewshire council is supportive of taking a sustainable approach.

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

This consultation exercise would have been of greater value had it focused on the draft Scottish chapter of the partnership agreement. Much of the information provided within the consultation document lacks detail, and most significantly, there is no financial allocation information.

There is no suggestion of spatial or thematic targeting and many of the interventions offer no further detail within the delivery section. It also appears that some are at an early stage of development.

While there is a logic to supporting a small number of large scale interventions, the proposals for 'lead partners' work better for some interventions than other. The local authorities are currently managing complex multi-partner CPP employability pipelines and have expressed significant concerns regarding the so called 'super CPP' approach whereby several CPPs with multiple funding streams and multiple partners will operate under one lead. Information on the Scottish Government plans for delivery should be provided as soon as possible.

Third sector partners have a range of concerns relating to this approach as they are equally anxious to receive some clarification on how pipelines will operate at the local level. Renfrewshire Council is concerned that planning for future delivery cannot progress until there is some clarity in terms of funding allocations and delivery structures.

Finally, we note that the consultation document does not contain any further information on the additional youth employment funding for the South West Scotland NUTS 2 region will be managed. As this funding is intended to be front loaded within the new programme, some progress in this area would be beneficial.