

European Structural Funds 2014 – 2020 Programmes

Analysis of Consultation Responses

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PART 1 - EXECUTIVE SUMMARY

1. In 2011, the European Commission announced their proposals for the 2014 – 2020 European Structural and Investment (ESI) funds. In response to the Commission’s proposals the Scottish Government have developed plans for the future Structural Funds Operational Programmes and Partnership Agreement. The consultation sought views from stakeholders on the development of these programmes and the proposals for the governance and delivery arrangements.
2. In total 84 responses to the consultation were submitted. Both qualitative and quantitative approaches to analysis were adopted to reflect the nature of the consultation questions.
3. Overall, the majority of respondents were supportive of the proposals and thought that the more strategic approach will better help address Scotland’s key challenges.
4. There were a number of common themes that were raised in the consultation responses. Most notable were the number of respondents requesting sustainable transport as a thematic objective (with a small number of requests for other thematic objectives); and a minority of respondents (10) in favour of retaining the current 4 Operational Programmes structure for Structural Funds.
5. Furthermore, there were some concerns raised regarding how policies such as youth employment, health inequalities and active ageing would be referenced in the Partnership Agreement and the Operational Programmes and how these policies could be integrated with the proposed strategy for the future programmes.
6. Although broadly in favour of the new governance and delivery arrangements, many respondents also requested further clarification on:
 - how the Partnership Agreement Monitoring Committee (PAMC) and Strategic Delivery Partnerships (SDPs) have been established;
 - the remit and membership of the PAMC and SDPs (in particular how they will work in collaboration, the role of partners, how each sector will be represented and geographical representation);
 - how the PAMC and SDPs will integrate with other EU funding streams;
 - how organisations can become involved in PAMC or SDPs; and
 - how the SDPs will be monitored.
7. The remainder of this report will set out these points in more detail in the same structure as the original consultation paper. As indicated in the original consultation, the Scottish Government will respond to the outcomes of this consultation together with the results from the shadow SDPs in the autumn.

PART 2 – INTRODUCTION

1. European Structural Funds have played a pivotal role in supporting the Scottish economy and they have underpinned many of the actions the Scottish Government have taken forward in the Economic Recovery Plan. It is therefore important that Scotland plans well to use the next round of funding sensibly and with the greatest possible impact.
2. In 2011 the European Commission announced their proposals for the 2014 – 2020 European Structural and Investment (ESI) funds. Furthermore, they published a Simplification Agenda underpinning the ESI fund regulations. The key elements for 2014-20 are that all ESI Funds should aim to contribute to the Europe 2020 agenda of smart, sustainable and inclusive growth; and all ESI funds must complement each other and work in conjunction with other EU funding streams, including Horizon 2020, ERASMUS and COSME.
3. In response to the Commission's proposals the Scottish Government have been developing plans for the future Structural Fund Operational Programmes and Partnership Agreement for all ESI Funds; as well as the governance and delivery structure which will ensure that these Funds continue to work together through implementation and programme lifecycles.
4. Through integration of the ESI funds in Scotland into three themed funds, we will not only address regulatory requirements to consider all ESI Funds in the round, but also address issues which have emerged during the current (2007 – 2013) programmes. Integration between the ESI funds will allow for closer alignment with domestic policies, creating more central match funding by the Scottish Government and major agencies, and will simplify audit and compliance arrangements.
5. The consultation also contained a number of proposals for ensuring that each EU fund programme has a significant impact on jobs and growth and focussed on:
 - The Partnership Agreement;
 - Thematic Objectives;
 - Scottish Themed Funds;
 - Governance and Delivery;
 - Youth Employment; and
 - Audit and control.
6. The written consultation closed on 30 June 2013. This report presents the analysis of the views contained in the written responses to the consultation.

Written Consultation Responses

7. In total, 84 responses to the consultation were received and have been made publicly available on the Scottish Government website unless the respondent has specifically requested otherwise. Table 1 shows the number of standard responses by category of respondent.

Table 1: Number of Standard Responses by Category of Respondent

Category	Number	Percentage
Local Authority	30	36%
Business & Enterprise	6	7%
Third Sector	28	34%
Further & Higher Education	11	13%
NHS	5	6%
Environmental	2	2%
Total Organisations	82	98%
Individuals	2	2%
Total	84	100%

8. Local Authorities comprised the largest organisation respondent group, submitting 36% of all standard responses received. The full list of the organisations responding to the consultation is in Annex A.
9. An electronic database was used to collate the standard responses to assist analysis. Both quantitative and qualitative approaches to analysis were adopted to reflect the nature of the consultation questions, many of which combined both closed and open elements. In reporting the results of the closed questions, the percentage figures given indicate the proportion agreeing/partially agreeing/disagreeing of all those who provided comments on the question. In some cases it was not clear from the comments whether the respondent was in agreement or otherwise; these were reported in the tables as commentary only.

Report of Findings

10. The following chapters set out a very brief summary of the proposals we consulted on and then documents the substance of the analysis. Chapter 3 examines the views of the Scottish Government's proposals for the strategy for the future programmes. Chapter 4 presents respondents views on the proposed governance and delivery arrangements.

PART 3 – STRATEGY

Partnership Agreement

1. Partnership Agreements will set out how Member States will invest Structural Funds to meet European ambitions. Scotland will have its own chapter in the UK Partnership Agreement which will enable us to set out the specific challenges and opportunities in Scotland which might not apply in the rest of the UK.

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

2. 68 respondents addressed this question.
3. Overall, the majority of responses supported the plans for and focus of the Scottish Chapter of the Partnership Agreement. Respondents requested clarification on a number of issues and made recommendations on areas that should be included in the actual draft of the Partnership Agreement but had been omitted from the consultation paper.

Policy

4. Below is a list of the key policy points raised by respondents:
 - beneficial for the Partnership Agreement to reference or set out how the ESI funds will be integrated and dovetail with other EU funding streams – such as Horizon 2020 or ERASMUS;
 - beneficial for there to be references to the EU cross border programmes and territorial co-operation themes;
 - beneficial to reference other EU funded interventions that will be supported through Regional Aid Guidelines;
 - beneficial to reference health and wellbeing agenda and set out how the ESI funds will be invested to reduce inequalities such as health, income, employment, social and educational;
 - a recognition of importance of parents/women’s employment opportunities and reflection on increased awareness in importance of childcare infrastructure, including school aged children;
 - further information on how ESI funds could support active ageing; and
 - clarification on how environmental issues will be addressed

Delivery

5. It is important that lessons are learned from the current programmes. Respondents have requested for flexibility to be built into the Partnership Agreement in order for interventions to be quickly refined in response to changing climates.

6. It is also thought by respondents that all delivery options should be open for consideration and the Partnership Agreement should enable this process by mentioning all regulatory delivery models available, for example Joint Action Plans, Community Led Local Development.
7. A number of respondents have requested further information on the roles and responsibilities of different sectors in the development and implementation of the new programmes. It is thought that the proposals could lead to reduced engagement with the some Local Authorities, the Third Sector and smaller organisations. One recurring request (16 mentions) was for clarification on the relationship between the ESI funds and other EU funding streams.
8. Furthermore, respondents would welcome clarification on how integration between the Scottish Themed Funds, and the Strategic Delivery Partnerships, will be ensured.

National and Local Requirements

9. A number of respondents think that the Partnership Agreement needs to recognise the different challenges at a national and local level and that a balance between top level and bottom level development must be achieved.
10. While there was a broad recognition that there won't be a separate Operational Programme for the Highlands and Islands, further information on the delivery and funding arrangements for this area as a transition region would be welcomed.

Thematic Objectives

11. The consultation suggested the most appropriate thematic objectives - based on previous consultations on the broad priorities Scotland needs to address using these funds and considerable baseline analysis of needs and opportunities in Scotland. It was proposed that the thematic objectives for Scotland would be:
 - R&D&I;
 - ICT;
 - SME competitiveness;
 - Low carbon;
 - Environmental protection and resource efficiency;
 - Labour market mobility;
 - Social inclusion; and
 - Skills and lifelong learning.

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

12. 75 respondents answered this question as follows:

	No	%
Agree with proposals	29	39%
Partially agree	6	8%
Disagree	1	1%
Commentary Only	39	52%

Policy

13. A number of respondents thought that the new focus on social inclusion is important in order to reduce the widening inequalities in Scottish society. For example, they highlighted the need for more support for children's early learning and development as it may reduce inequality and increase parental labour market participation, or initiatives that will address the underlying wellbeing of the workforce.
14. Furthermore, while there is significant demand for interventions to focus on youth employment some consideration needs to be given to active ageing and how older generations in rural and remote areas can contribute to the workforce. Some respondents also requested further support for business competitiveness and highlighted that there should be support for SMEs to exploit their products.
15. Requests for clarification on how the proposed thematic objectives will address environmental issues following the announcement that sustainable transport or climate change adaptation may not be selected, were made. One respondent also advised that it would be beneficial for the thematic objectives to be reviewed on a regular basis to ensure that they remain aligned to economic needs and opportunities.

Delivery

16. Concerns regarding duplication across the funds and engagement with the education sector (particularly schools) and the public sector (notably the health service) were raised.
17. Requests for clarification on what will be classed as eligible activity were raised. There was also a request for further collaboration between the higher education sector, the public and voluntary sector and industry in order to improve the structure and impact of projects.
18. While there is support for flexibility to ensure that the thematic objectives are aligned with local requirements, out of 75 respondents, 4 requested separate thematic objectives for the Highlands and Islands area in order to recognise the development needs and opportunities of this area.

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

19. 71 respondents addressed this question of which 33 said that sustainable transport should be addressed; 14 said capacity building should be addressed; and 8 said climate change adaptation should be addressed.

20. It was suggested that inequalities should be considered as a horizontal theme and applicants could demonstrate how their project will reduce inequalities at application stage. In addition, there was a request for a specific objective which would address the growing disparity in expectations between urban and rural Scotland (for example a thematic objective which supports Community Led Local Development such as ‘*Rural Regeneration or Rural Opportunities*’) and there were also requests to widen access to childcare.

21. One respondent explained that it would be beneficial for further information on how those thematic objectives not selected will be addressed to ensure that the challenges in these areas are not ignored.

Integration Strategy

22. The consultation paper set out proposals for the financial allocations to be made to schemes, programmes and projects through three Scottish Themed Funds:

- Competitiveness, innovation and jobs;
- Low carbon, resource efficiency and the environment; and
- Local development and social inclusion.

23. The objective of the Scottish Themed Funds is to collectively support genuine long term change in the skills base, in the growth ambitions of Scottish SMEs, in energy consumption, in land use, and in the wellbeing and resilience of all Scotlands communities. The intention is that activity supported by the EU funds is coherent and complementary and will minimise duplication of funding and delivery arrangements.

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

24. 74 respondents address this question as follows:

	No	%
Agree with proposals	18	25%
Partially Agree	7	9%
Disagree	3	4%
Commentary Only	46	62%

25. Overall, respondents think that the proposals are broad enough to address Scotlands key challenges and the Scottish Themed Funds will effectively

combine four funding streams. However, given the limited resources the impact they have may be less than anticipated.

26. Although the proposals will address Scotland's national key challenges there needs to be some flexibility in order to address local issues. There have also been requests for health and wellbeing to be included as an example under the Local Development and Social Inclusion fund.
27. Some respondents have requested clarification on what will be classed as eligible activity under each fund and how support could be targeted towards 30 – 34 year olds. There have also been requests for flexibility to refine specific activities under each Scottish Themed Fund.
28. While two respondents disagreed that the Highlands and Islands share the same challenges as the rest of Scotland, another respondent was encouraged to note that the Operational Programmes will set out the specific requirements for transition regions.
29. The respondents that disagree think that the division of funding into three themed funds presents the risk of one fund being oversubscribed and that the lion's share of the funds will go towards large projects that look good for European Auditors and will fail to address Scotland's key challenges. These respondents have advised that in order for the proposals to work there must be consistency in how the ESI funds are implemented and simplification in process – for example one application form across all ESI funds.

PART 4 – GOVERNANCE AND DELIVERY

Governance

1. It was proposed that for coherence across the Scottish Themed Funds there will be a single Partnership Agreement Monitoring Committee (PAMC). Operations which are eligible for ESI funding will be owned by Lead Partners and will be monitored by Strategic Delivery Partnerships (SDPs).

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

2. 77 respondents addressed this topic as follows:

Partnership Agreement Monitoring Committee

3. Generally respondents think that the PAMC will aid simplification and that it will have a critical role in taking an overview across all three themed funds.
4. Some respondents think that it is important for the PAMC to reflect the geographical and sectoral make-up in Scotland and would welcome clarification on the membership of the PAMC. Others think that the PAMC could address these challenges by either having sub groups of the PAMC (either rural or urban) or have a separate PAMC for the Highlands and Islands.

Delivery

Strategic Delivery Partnerships

5. There has been a significant number of requests for further information on the legal, financial and audit roles of the SDPs. In addition, there have been requests for information on how organisations can become involved in the SDPs.
6. It is generally thought that the remit and membership of the SDPs should be determined through a defined process. This will ensure that membership is not dominated by government bodies and that there is adequate representation for the private sector.
7. It is also thought by respondents that the SDPs will only work if members recognise the importance of partnership working and that potential conflicts of interests should not be underestimated.

Engagement

Local Authorities/CPPs

8. Respondents from this sector advised that there needs to be fair representation on the SDPs and at the PAMC. The mixed performance of CPPs in engaging with other sectors has been highlighted by some respondents and it has been

suggested that this could be addressed by adopting a Code of Conduct for SDP partners.

9. There are some concerns that the proposals are not practical for this sector as resources are held centrally and each council is a distinct legal entity meaning that it would be difficult for them to fulfil the proposed responsibilities of SDP partners.

Further Education

10. A number of respondents have advised that the proposals align well with the college regionalisation.

Third Sector

11. Some respondents raised concerns regarding third sector representation at the SDPs and that the proposals will exacerbate the disengagement experienced by smaller organisations.
12. It was recognised by respondents that further needs to be done to ensure third sector engagement in the Scottish Themed Funds and that the sector must identify and agree on one national organisation to represent them.

Operational Programme

13. Out of 84 respondents 10 have requested a separate programme for the Highlands and Islands area in order to clearly set out the specific delivery and governance arrangements for transition regions.

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

14. 70 respondents answered this question as follows.

Simplification

15. Overall, respondents think that the proposals will aid simplification and should reduce the resources required to address the current administrative processes and procedures. It has also been noted by respondents that the proposals should provide new opportunities and that the new programmes will have less onerous audit requirements. There is also general acceptance for focussing on outputs with payments on outputs and agreed milestones.
16. However, some smaller organisations do have concerns over future resourcing demands and the capacity that will be required to deliver and manage large scale operations. In addition, respondents have highlighted that there must be consistency in audit arrangements across all EU funding programmes. This would be particularly welcomed by organisations that access a variety of these funds.

Partnership Working

17. Respondents have recognised that the proposals present the potential for existing partnerships to be merged ensuring cross sector engagement and that new partnerships should only be commissioned where required.
18. However, some think that the proposals will exacerbate the sense of disengagement felt by some organisations and there are concerns that the proposed structure will rely on SDP partners to relay intelligence and knowledge through local connectivity rather than a direct mechanism. To overcome this it has been recommended that the relationship between the SDP partners must be structured.

Local Authorities/CPPs and relationships with other

19. Generally Local Authorities think that there will be a significant challenge to demonstrate local impact on delivery of national objectives and that partnership working between Local Authorities will become vital. Previously there have been some difficulties in other sectors or organisations engaging with CPPs and respondents have indicated that they would welcome a simple process for engagement. It has been highlighted by some respondents that if this is left unresolved then some organisations will inevitably find funding opportunities are scarce. In addition, some Local Authorities think that the proposals will exacerbate disengagement and that they may not have the opportunity to influence the new programmes.
20. Respondents also think that there is a strengthened role for CPPs and health services that could be better linked to the process.
21. In addition respondents highlighted that having single Local Authorities or CPPs as lead partners, and taking the financial and audit responsibility for large groupings, may be difficult to implement.

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?

22. In total 71 respondents addressed this question.
23. In general the proposals have been welcomed, however, respondents have either highlighted or requested further information on:
- how the level of financial and legal certainty, required to minimise audit risk, will be achieved;
 - how information regarding the new programmes will be communicated to all stakeholders equally;
 - how decisions will be made with as much transparency as possible; and
 - if the start of the new programmes is delayed how will the funding gap be filled.

Delivery

24. Overall, respondents have advised that the governance and delivery arrangements need to be kept as streamlined and transparent as possible in order to ensure full engagement and participation from all stakeholders. The importance of carrying forward lessons learned from the current programming period was also highlighted and respondents have suggested that rather than creating new structures, arrangements which have been shown to work, should be built upon.
25. Furthermore, there needs to be a fully developed and tested operational framework in place prior to the programme launch (including Operational Programmes, IT system, National Rules, guidance and cost methodologies). Respondents also requested clear monitoring plans and guidance is needed on how the PAMC and SDPs will work.
26. Some respondents have advised that Integrated Territorial Investments (ITI), Joint Action Plans and Community Led Local Development should be explored as an option for addressing geographical issues. One respondent advised that if local action groups were able to draw funds from each of the Scottish Themed Funds then they could ensure complementarity between Structural Funds and other EU Funds. .
27. Other respondents also requested a global grants programme and wider availability of Technical Assistance to ensure the involvement of a wider cohort of locally based organisations.
28. In addition, respondents think that further work needs to be done to align the proposals to social policy agendas, such as Equally Well, the Early Years Framework and Achieving Our Potential.

Youth employment initiative

29. The Youth Employment Initiative will support any young person in the EU who has been unemployed for more than four months by offering them a job, training or apprenticeship. The initiative will mean that all regions in the 'NUTS 2' category that had youth employment rates above 20% in 2012 would be eligible for Youth Employment Initiative help. This may mean that the South West of Scotland could be eligible to benefit from this funding.

<p>Question 8 – What other delivery options do you think would be feasible for delivering youth employment initiatives?</p>
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30. A total of 60 respondents addressed this question as follows.
31. Respondents highlighted that under the proposals only certain areas of Scotland will be eligible for these funds, however, this is a pan Scotland issue and support is required across the region.

32. In addition, there is an agreement that many sectors, including third, public, private and further and higher education need to be involved in delivering the Youth Employment Initiative.
33. While it is recognised that there is a need for a tailored pipeline for people that require extensive support to get into employment, a separate delivery arrangement for the Youth Employment Initiative could undermine efforts to integrate investment. Some respondents think that the development of a local strategic skills pipeline would ensure that delivery builds on existing models of good practice and would improve outcomes.
34. Furthermore, some respondents highlighted that these funding opportunities should be limited to those under 24 years old as a high proportion of over 24's are accessing other provision.

Audit and control

35. Each ESI fund will have its own implementing regulation and as a result mixing the funds in a single strategic operation may be difficult to manage from an audit and reporting perspective. In order to retain clear reporting and audit lines each operation will need to either:
- draw from one ESI fund; or
 - be designed to have clear and distinct elements which only draw from one ESI fund.

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

36. 63 Respondents answered this question.
37. Many advised that there needs to be clear, established and tested guidance and National Rules from the outset of the programmes and they need to take into consideration lessons learned from the current programmes. Respondents also request that training on the operational system for the new programmes be provided prior to their launch. There were also requests for guidance on State Aid and National Rules.
38. Respondents advised that processes should be designed with the user in mind and audit requirements should be proportionate to the scale of the funds involved. Some respondents indicated that simplification could be ensured with fewer checks and more on-line reporting, and that this could be achieved by having an annual check that is subject to audit checks and not the current system of continuous audit checks.
39. Some respondents welcomed the introduction of simplified cost options and requested further information on how these would be implemented. In addition,

respondents welcomed the move to outcomes based monitoring. However, it was highlighted that outcomes can take a while to be achieved so a milestone approach may need to be developed. Respondents also advised that care will need to be taken when designing the operational system so that it accurately records all the necessary information.

40. There was also an agreement that it is important not to deter projects from seeking multiple sources of funding by ensuring there is flexibility around audit and reporting requirements. Furthermore, funding applications have historically been challenging to complete in tight timescales and respondents recommended two funding rounds to overcome any problems with deadlines.
41. One respondent also highlighted that many of the forms for the current programmes are not accessible and present difficulties to those with certain disabilities. In the new programmes forms should be made available in accessible formats.

ANNEX A

List of Consultation Responders

Aberdeen City Council
Aberdeenshire Council
Angus Council
Archaeology Scotland
Argentix Ltd
Argyll and Bute Council
British Red Cross
Children in Scotland
City of Edinburgh Council
Clydebank College
Coatbridge College
Comhairle nan Eilean Siar
Confor
Directorate for Chief Medical Officer and Public Health
Director of Public Health
Dundee City Council
Dumfries and Galloway Council
East Ayrshire Council
East Dunbartonshire Council
East Lothian Council
East of Scotland European Consortium
Edinburgh CPP
Equality and Human Rights Commission
Fife Council
Financial Skills Partnership on behalf of JSSC group
Forth Valley and Lomond LEADER
Glasgow City Council
Highlands & Islands European Partnership
Highlands Council
Industrial Communities Alliance Scotland
James Hutton Institute
John Wheatley College
Link Group
Bakka
Moray Firth Media Trust
Moving on Employment Project Ltd
Edinburgh Napier Uni
NHS Ayrshire and Arran
NHS Fife
NHS Grampian

NHS Highland
North Ayrshire Council
North Lanarkshire Council
Orkney Blide Trust
Orkney Islands Council
Perth and Kinross Council
Peter Ross
Plunkett Scotland
Queen Margaret University
Railfuture
Renfrewshire Council
Scottish Trades Union Congress
The Action Group
The Princes Trust
The Wise Group
University of the Highlands & Islands
University of Strathclyde
Shetland Islands Council
South Ayrshire Council
South Lanarkshire College
South Lanarkshire Council
Scottish Qualifications Authority
Stirling Council
Royal National Institute of Blind People (RNIB) in Scotland
Scottish Council for Development and Industry
Scottish Chambers of Commerce
Scottish Community Alliance
Scottish Opencast Communities Alliance
Scottish out of School Care Network
Scottish Council of Voluntary Organisations (SCVO)
Scottish Enterprise
Scottish Environment Protection Agency
Scottish Further and Higher Education Funding Council (SFC)
South of Scotland Alliance
The Royal Society for the Protection of Birds (Scotland)
Visit Scotland
Voluntary Action Scotland
Voluntary Arts Scotland
West Fife Enterprise Ltd
West Lothian Council
West of Scotland European Forum
Woodland Trust Scotland
West of Scotland Colleges Partnership (WoSCOP)



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