

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?

Broadly speaking the investment priorities seem appropriate but much detail is lacking in order to give a comprehensive endorsement. Where detail is provided it seems to be done without a significant evidence base to support some of the assertions made.

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

Linkage between funds makes sense as part of a drive to ensure that there is no duplication or replication, however there is scant detail on how the linkages between the funds will ensure that this occurs and equally that there will be mechanisms in place to ensure that gaps are not created.

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?

We have real concern over the proposals and their likely negative impact on social inclusion. Despite strong representation by the Third Sector, the Scottish Government seems determined to go down a Prime Contractor route, utilising the CPP's in the belief that this will lead to a more streamlined delivery model. CPP's have a mixed track record in terms of

engaging with the Third Sector, particularly at organisational level and we are not aware of anything that leads to a suggestion of an improvement in this behaviour and approach.

The consultation document suggests that a large number of small projects means fragmented outputs and limited impact – where is the evidence to support this? That assertion may be the result of problems in the local management of the current programme rather than in the actual delivery. We have seen a more comprehensive and strategic approach to Priority 5 but this could have been strengthened further.

The document also states that small organisations are not equipped to manage the audit burden. This is undoubtedly true but could be addressed by simplifying the method of claiming and evidencing. There is nothing to suggest that by having a lead partner the audit burden will significantly reduce, this will have to be tested by the behaviour of the lead partner and its levels of flexibility. It seems more likely that this approach will merely make the audit process easier for Government and Europe. The fact that a lead partner has not yet been decided upon for some areas of work is also hugely disconcerting and leads us to believe that there is the likelihood of either a rush to create this or a further delay in the introduction and implementation of the 2014-2020 programme with the attendant impact on potential beneficiaries and on employment of skilled and experienced deliverers.

Strategic Delivery Partnerships seem an unwieldy, and potentially unequal group. The fact that neither the shape nor membership of these SDP's has been decided upon, nor the lines of demarcation between Smart, Sustainable and Inclusive growth again suggests a further delay or disappointing fudge.

As referred to earlier, the Government seem determined on a Prime Contractor model and we wonder what the evidence is for such an approach, beyond cutting down on the number of claims to be dealt with? Prime Contractor approaches have, most significantly, been in place for the Work Programme with decidedly patchy results and in a purely Scottish context have been employed in the Reducing Re-offending Change Fund PSP's. It is too early to say whether they have been a success in that arena but practical experience again suggests a less than perfect implementation, with difficulties arising across large scale partnerships with differing expectations, priorities, abilities and understanding.

In terms of social inclusion and combating poverty it is stated that discussions are still ongoing with a range of partners on the right role for the funds. When is this likely to be completed? As most current projects will cease at the end of March there is no possibility of applications being submitted, assessed and awarded by that time, particularly if we are being asked to act as part of a much larger, strategic consortium based approach. Whilst the words are encouraging in this section there seems to be very little substance or clarity as to how the third sector will have a significant role to play in the delivery of such services. Clearer guidance is required on this as a matter of priority.

Whilst few agencies would be critical of the pipeline approach there is no single model or approach. That can be expected, to an extent, as there is a requirement to recognise local need, however the pipeline approach can lead to a myriad of approaches that the third sector has to wade through in terms of application and then delivery. This may well bring about greater bureaucracy than the current audit burden.

It would also appear that Community Jobs Scotland is unlikely to continue into the 2014-2020 programme. We feel that this would be a missed opportunity and that the Scottish Government should be applauded for introducing this initiative in the first instance. Whilst it may seem more expensive than some other models, such as the Skills Development Scotland Employability Fund, it is a significant boost to the skills, work experience and confidence of many young people. To end this initiative would be a retrograde step and would mean either reliance upon the Employability Fund which is flawed in its financial model and application or the Work Programme which is recognised as failing many of our most disadvantaged citizens. If the CJS scheme is to be merged with other proposals, further discussion and clarity is required before it is possible to assess whether any such approach would be of real benefit.

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.

Firstly, an extension to the current programme is required to avoid a significant number of beneficiaries losing out on much needed support and to ensure that we can hold onto the skills, experience and commitment of many workers around the country. Once that is lost it can take a considerable amount of time to rebuild such knowledge.

Beyond that, and looking longer term we would suggest that further discussion is needed as to the way forward in terms of assessing more fully whether a predominantly CPP led strategic delivery (or Prime Contractor) approach is the best or whether a more suitable arrangement can be found. That would also enable more time to be given to the consideration of how such SDP's could be administered, overseen and contributed to.

As such we would advocate a continuation of the semi strategic approach utilised by Priority 5 for the first two years of the 2014-2020 programme to enable such discussions to be completed and to allow for a more thought through transference to a new agreed model rather than the seeming imposition of a model which hasn't yet been settled upon in many areas.

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

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

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