

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?

North Lanarkshire Council would like to acknowledge the efforts made by stakeholders in very challenging circumstances, not least in relation to timescale, to produce the series of possible interventions listed in part 5.

However it is clear that some of these interventions are more elaborated than others and further development work is required for a number of these, in particular, that addressing Poverty and Social Inclusion. Further justification for the inclusion of these interventions, based on the current socio economic conditions facing Scotland, would have been useful.

The Council is pleased to see the significant role assigned to local government in the delivery of interventions within which local government has existing expertise and knowledge such as Employability and Loan Funds delivered to local business. However, there is clearly a role for local government to play in the delivery of a number of other interventions such as Poverty and Social Inclusion, the Regeneration Capital Grant Fund, addressing the challenge of Vacant & Derelict Land, Business Competitiveness and Next Generation Broadband. North Lanarkshire Council welcomes the acknowledgement within section 5 of the broad role that local government can play in the delivery of interventions.

North Lanarkshire Council would like to point out that the lack of detailed financial information within the document makes it difficult to gauge what effectiveness or broad impact these interventions are expected to achieve. Therefore, indications are that there is an overbid for resources and the Council would welcome further consultation on this matter in due course.

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

The fact that the Scottish Partnership Agreement enables more coordinated interventions across the EU Structural, Rural and Maritime funds in Scotland provides a great opportunity to maximise the local impact of these interventions. However, in order to ensure this is the case CPPs and Local Action Groups will need to communicate and co-ordinate their actions closely.

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?

Many of the proposed interventions should have the objective – either explicitly or implicitly – of addressing social and economic inequalities. However, given the limited information provided further assessment of this should take place as a more detailed programme emerges.

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.

See above response on further information needed. However, in line with the COSLA, we are keen on strategic interventions allowing a reasonable degree of local discretion and control over resources, while at the same time working in partnership with other bodies through a consistent pipeline approach of interventions, led by the different bodies contributing to national outcomes.

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

North Lanarkshire Council agrees with the current COSLA position that *‘Individual and groups of local authorities should be given all eligible EU monies directly from the Scottish Government and therefore be in control of how these monies are spent.’*

The Council notes that the six strategic intervention submissions prepared by council officers amount precisely to one third of the Scottish Partnership Agreement allocation. The Council believes that that this is the absolute minimum share that the local government sector should have access to.

The Council are keen to work in partnership with Government and other bodies, but remain sceptical that forcing a Lead Partner delivery model on Local Government would work. Clearly the preference is to continue and improve the current arrangements that enable local authorities, Business Gateway and CPPs to be individually responsible for their own EU fund allocations, rather than asking them to enter into legally binding arrangements with each other to delivering EU funded strategic interventions. Using the same logic, we do not support local authority-led activities or funds being subsumed into interventions led by Government, other agencies or bodies.

We also note that no detailed description of the legal responsibilities among councils and/or other bodies under the proposed Lead Partner model has been shared by

Government, thus preventing any detailed assessment on its financial and legal

Crucially, to provide political oversight to the Programme and Monitoring Committee discussions, a periodic, systematic dialogue on the strategic delivery of the programmes should take place, involving relevant Cabinet Secretaries and COSLA Presidential Team/Spokespersons, with adjustments, if appropriate, to ensure geographical representation.

Audit and reporting rules need to be clear from the outset and Audit Scotland needs to work with Scottish Government and councils to ensure that there is a clear understanding of our new potential obligations up front, including the new simplified cost models that council officers have been preparing with civil servants to alleviate management and audit burden.

As we move to the Operational Programme drafting we expect that the discussion and engagement will be as open to Local Government input as the Strategic Delivery Partnerships, but we need clarity from the outset about the format, structures and calendar of drafting.

Another issue that is still unresolved is the issue of pipeline approaches, particularly as per the Business Accelerator support, where both Business Gateway and the Enterprise Agencies made proposals. Following attempts to merge them, we understand that the Government would now be open to accepting that these interventions could be kept separate, with SE delivering higher end interventions, BG the local business interventions, and HIE in the H&I area delivering both higher end and local interventions. Final reassurances are thus needed from the SG that a business support pipeline will be set up and work with partners will be needed to ensure complementarity and delineation between these three interventions.

The other main pipeline is the employability skills pipeline that will expand Scotland-wide the existing employability activities, but increasing its scope and adding the new Youth Employment Initiative (where the West of Central Scotland is eligible for an extra £53m seed funding due to a youth unemployment rate above 25%) as part of the final stage of that pipeline. We understand that there are good prospects that the Scotland wide CPP employability intervention will be funded over the next 7 years, and due to Commission rules the Youth Employment Initiative £150m funding specific to South West Scotland (in including £50m of direct EU monies, £50m of ESF monies and £50m partner match funding) will need to be committed and spent between 2014-2017 in this area alone.

North Lanarkshire Council remains to be convinced that the proposed change from current arrangements to deliver EU funds such as Youth Employment Scotland, where Councils are individually accountable to the Scottish Government for delivering EU funding, to a new Lead Partner model currently being proposed by Government, could work effectively. North Lanarkshire Council is therefore supportive of the COSLA proposal to the Scottish Government to involve SOLACE and legal officers to identify a pragmatic model that address both Government and Councils' demands.

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

In North Lanarkshire, European funding has contributed to and acted as a significant catalyst for a number of regeneration initiatives. Within the 2007-2013 programme grant has been secured towards employability, business support, social enterprise development and lifelong

learning initiatives. The most significant project within these in terms of scale is North Lanarkshire's CPP Skills Pipeline, which has been developed over time to ensure a coherent and effective employability service is available within the area. In addition, within this period and for the first time, North Lanarkshire, in partnership with East Dunbartonshire Council, gained EU rural development funding from the LEADER programme for parts of the Kelvin Valley, which offered funding to small scale community driven projects.

Much of the EU funding which has come to North Lanarkshire has been the result of targeting of limited resources on areas of most need. Given the continued limited funding available the Council is keen to see targeting of funding continue in the 2014-2020 programmes.