CONSULTATION RESPONSE FORM

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

Although broadly in agreement with the three themes identified in the partnership agreement Scotland is slightly ahead of the UK in achieving greater social inclusion and reducing unemployment, especially among young people. There should either be a fourth theme "Raising the numbers of people in employment, especially young people" or the second theme should be adapted to incorporate this ambition.

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

These thematic objectives will address Scotland's short and long term challenges and agree on the themes that will not be supported.

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

No other thematic objectives need to be addressed, but as in the Scottish themed funds these should not be seen as exclusive and where possible need to be con-joined and mutually re-enforcing.

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

Yes, but again these should not be seen as mutually exclusive. As already happens in some projects in the current programme addressing local development and social exclusion is leading to jobs being created and filled that improves the competitiveness of employer's in key and enabling sectors by having access to the skilled workforce they require. There is scope for some merger/overlap between social inclusion and local development and competitiveness, innovation and jobs.

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

There is no identified role for NGO's (Third sector in this structure), although we do not bring a resource pot to the table we will be crucial in the delivery agent tier, as we deliver many of the front line services required to achieve the objectives of the funds. We are a sector that is highly creative, innovative and successful in moving many of the socially excluded in society into the economy.

To avoid a serious loss of capacity to carry out this vital work it is imperative that lead partners have a strategy or code of practice to enable the delivery partnerships to disburse allocations to the sector where many of the most tangible impacts and results will be gleaned.

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

As an organisation we have brought a myriad range of other funders into the match funding pot;- BIG Lottery, Further Education, Local Authority and other trusts/charitable giving bodies so the funds have maximum impact. The programme can't afford to lose sight of this added value. The scope enables best practice delivery to continue in some fashion and we are recognised as being exceptionally proficient in meeting multiple dimensions of the programme objectives at the same time.

The governance and delivery arrangements appear stronger and more-straight forward and could provide greater re-assurance to a number of the most vulnerable delivery partners who can deliver on the programme aims. The devil of course is in the detail and there needs to be a compact with the SDP's that they will treat our organisation as with all NGO's with equality and fairly, improve up front funding, reduce administration, and improve turn around of payments to avoid cash flow problems. These issues are all solvable if a clear directive is issued to do 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?

Multi-Annual Approval remains extremely important for organisational planning and if required adapting delivery arrangements to programme priorities, as does funding surety, match funding and up front support.

Timeous turnaround of payment release is also critical to ensure continuity of service delivery and again needs to be built into the strategic delivery partnership thinking for gaining best value from the NGO (third sector).

The sector will by return deliver a clear and visible multi-dimensional impact across many of the objectives and monitoring and measuring systems need to be strengthened across the structure to reflect this for the NGO and all other partners.

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

Alongside the south west of Scotland there are pockets of very high youth unemployment in Fife for example the youth unemployment cohort comprise 50% of all the unemployed.

This should not be ignored, as mentioned earlier no theme should be seen as being in a silo and such a youth employment initiative can equally address skills and social inclusion.

The third sector is ideally placed to capitalise on this perhaps in a compact with SDS/LA's.

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

The ambition here is clear, but the detail insufficient. Clear and unambiguous guidance written in plain language is imperative with minimal scope for mis-interpretation will be a considerable step forward.

Also be it unit costs, procurement or contracting the reduction of in-eligible cost areas is critical so that delivery agents break even.

In addition audit issues need to be proportionate to awards. Massive amounts of time and money have anchored current programme delivery chasing up relatively insignificant amounts of expenditure and some threshold needs to be set for this while in no-way compromising a lead partners responsibility to be financially transparent and accountable.

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

The proposals outlined in this paper present a cognitive way forward on a broad front, but within the parameters of this consultation only a limited amount of feedback can be provided.

There is a wealth of experience of making structural funds highly successful in Scotland and as in all evolutions to a new approach the devil is in the detail.

In additional to the formal consultation arrangements a more in-formal gathering of views and ideas could provide significant benefit to sense check where we are heading and enable the translation of this new approach to cascade down. The achievement of the 2014-2020 objectives requires a cultural shift in how we have grown used to using and delivering structural funds, to avoid a shock to the system and enable as smooth and efficient a move to a new era, we should consider drawing on this expertise pool to best effect so we do not face any major re-think downstream.