

Ulster Farmers Union

Thank you for the opportunity to comment on the above. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing over 12,000 farming families and as such would like to make the following comments;

The inclusion of Priority 3, *Improving Accessibility and Protecting and Enhancing the Environment* is welcome. UFU supports a greater focus being placed on promoting sustainable development, and in particular renewable energy sources. We believe a mushrooming of renewable energy projects could have a major role in making rural communities more vibrant, at the same time benefiting the wider economy and environment.

Northern Ireland Agriculture has suffered a significant decline in overall profitability since 1998.² This is undoubtedly having a detrimental impact on rural communities, while increasing the mix of economic activity within rural areas is recognised as an important component of Rural Development. For purposes of Complementarity between different EU funds, Priority 3.1 *Sustainable Energy –Agri Challenge Fund* would operate at the macro level, complementing the new Rural Development Programme's more localised, rural approach. Major infrastructure type investment is urgently required to bolster the capacity within Northern Ireland to meet increasingly challenging EU targets for renewable energy production.³

A unique opportunity exists for farmers and rural communities to make a major contribution to creating a more secure, diverse and environmentally sensitive energy supply. In recognition of the role farmers can play in this, the European Union is actively seeking to promote Renewable energy from biomass in the form of transport fuels, heat and electricity.⁴ However, significant investment in essential infrastructure in Northern Ireland is necessary to replace a portion of our energy mix with renewables.

It is timely to direct Competitiveness funds towards developing support mechanisms to encourage/pilot renewable energy programmes. We also welcome the need to raise awareness and knowledge of renewable energy among the population, to help ensure greater take-up. This is particularly true in respect to the decentralised nature of many renewable energy options.

² *Total Income from Farming*, DARD Aggregate agricultural account 1981 – 2005
<http://www.dardni.gov.uk/index/publications/pubs-dard-statistics/pubs-dard-statistics-agricultural-aggregate-account.htm>

³ EUROPA http://www.consilium.europa.eu/ueDocs/cms_Data/docs/pressData/en/ec/93135.pdf

⁴ *Biomass Action Plan 2005*, [COM(2005) 628 final - Official Journal C 49 of 28.02.2005].
EUROPA <http://europa.eu/scadplus/leg/en/lvb/l27014.htm>

We support the need to upgrade the transmission and distribution system, in a way which will facilitate a much higher degree of renewable electricity to be fed into the grid. Grid weaknesses are major obstacles preventing a greater distribution of renewable installations in Northern Ireland. We also assert the benefits in terms of jobs and skills to rural communities that can come from decentralised power generation, for example through district combined heat and power systems. A priority area for funds must be in enabling a fundamental shift in how energy is produced, in a way which will ensure much higher efficiencies and greater economic gain. Localised generation and distribution systems can make use of electricity as well as the heat 'by-product', resulting in efficiencies of 90% as opposed to Centralised generation which is much less once distribution losses are considered.

Northern Ireland has a huge way to go to contribute its fair share towards meeting increasing renewable targets. 20% of Europe's primary energy consumption is to be met by renewables by 2020, including 10% biofuels. Government also has a commitment to making the public estate carbon neutral, towards meeting its sustainability targets. There is great scope for the EU Competitiveness and Employment Programmes 2007-2013 to be a major driver in rolling out renewable energy sources in Northern Ireland.

We trust these comments will be considered as part of the consultation process for the new Programmes.

We would welcome the opportunity to discuss these matters further if you feel this would be helpful.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kenneth Sharkey', written in a cursive style.

Kenneth Sharkey

University of Ulster

Question 1: What are your views on the Socio-Economic Analysis relating to the draft ERDF Competitiveness Programme?

The socio economic analysis is comprehensive and provides valuable insight to the development of the 3 Priorities proposed within the Competitiveness programme.

The SWOT analysis is particularly useful and should form the basis of future funding decisions, with support not only provided to eradicate weakness but also ensure strengths are maintained, opportunities exploited and threats eliminated or kept under control as far as possible.

Question 2: What are your views on the Labour Market Analysis relating to the draft ESF Employment Programme?

The Labour Market analysis in line with the Socio Economic analysis provides a good rationale for the proposed objectives within the employment measure. The underlying trend of 20% of the population of NI being less than 15 yrs old combined with the statistic that 65% of young people who leave NI for Higher Education and don't return are potentially worrying and something that needs addressed particularly if the economy is to grow and attract the high added value jobs. It will be necessary for a pool of skilled labour to be available to meet the needs of new investors.

The 2 objectives within the measure can be the catalyst to increase the skills base, create economic growth and provide the basis for investment and increased prosperity.

Question 3: What are your views on the proposed strategy, priority, key areas of expenditure and allocations for the ERDF Competitiveness Programme?

The proposed strategy accurately reflects the socio economic and labour market analysis. The formation of 5 technology advisory panels in key areas will ensure funding is targeted at areas which will provide the greatest return. The aim of increasing R&D expenditure by local companies is exciting and provides greater opportunities for interaction with the Higher and Further Education sector.

The potential for increased spin out companies and the further commercialisation of University Research combined with greater Industrial links may be key to the growth of the economy in NI. With 49% of all R&D being conducted with the 2 Universities, they will have a major role to play along with Industrial and Government partners in the delivery of the economic growth and prosperity.

With over 50% of the funding in the measure aimed at increasing the levels of R&D in NI, this competitiveness programme is providing the funding to address the areas of weakness while at the same time promoting the further

enhancement of existing strengths. This shows a serious intention to address underlying problems of underinvestment.

Question 4: What are your views on the proposed strategy, priority, key areas of expenditure and allocations for the ESF Employment Programme?

In line with the labour market analysis this programme aims to increase the skills base of both those currently in employment and those not possessing the skills to take up employment. The overall aim should be to create a pool of labour that is highly skilled to attract the high valued added jobs that will produce economic growth and prosperity.

The overall aim is stated to be helping people to achieve sustained employment. In order to do this there must be a two pronged approach.

. The first approach should tackle the basic problems of numeracy and literacy and the lack of recognised qualifications.

. The second approach should be to concentrate on providing the skills necessary to attract the high value added jobs and this should focus on 3rd level education and in particular post graduate education.

These approaches are complementary and not mutually exclusive and a sustained effort to focus on both will lead to economic growth.

The programme is heavily focused on the first approach and not enough emphasis has been placed on the second with the result that the overall strategy for economic growth's aim to create knowledge based, innovative and business friendly region is in some doubt.

The two pronged approach provides a skills ladder from lack of recognised qualification to the highly skilled recognised qualification and will provide the skills mix necessary to attract investment and provide sustained employment.

Question 5: What are your views on the cross cutting theme for both Programmes of ensuring equality and promoting sustainable development, and creating sustainable communities?

The cross cutting themes for both programmes are in line with current legislation and are to be welcomed.

Question 6: What are your views on the management and implementation arrangements for both Programmes, including the simplified delivery structures, co-ordination arrangements with other Community Programmes and technical assistance proposals?

A simplified delivery structure is to be welcomed and a reduction in the frequency of audits should also be considered. It is recognised that there is a need for audit, however the frequency and volume of work associated with numerous audits is counterproductive. It is also not clear that the audit requirements take into account the difference between small medium and

large organisations and to impose a strict audit regime which is not flexible enough to account for different organisation structures is also very counterproductive. The adoption of a tick box mentality by some auditors indicates a lack of understanding or willingness to understand financial systems operating in large computerised environments.

This is allied to the stipulation that all documentation relating to programmes must be kept for 7 years beyond the programme end date. This is very costly in terms of storage and with audits taking place on an annual basis the need for long term storage is hard to justify. If we need numerous audits then these should provide evidence that all documentation was available at that point and the need to store vast amounts of documents for lengthy periods is not required.

Question 1: What are your views on the Socio-Economic Analysis relating to the draft ERDF Competitiveness Programme?

This analysis is to be welcomed as it helps identify the areas where need is more acute and key factors such as Demography, Productivity, Innovation, Enterprise and North/South Co-operation being critically benchmarked with other countries.

We would however suggest that the key factors of Enterprise and Innovation are considered together in an inter-related way. We would propose that in order for these to develop in Northern Ireland, in the longer term, ERDF Funding could be used to pilot initiatives in Enterprise and Innovation in the curricula of schools and colleges. In our own experience, our European partners, particularly in Finland have taken cognizance of their small business economy and its potential for growth. Hence, children are introduced to starting their own businesses in primary school to developing robust business plans as part of their curricula. Pilot work is needed in this to find the 'best' fit and we can benefit further from strategic exchanges with European partners.

In Northern Ireland, 15.5% of the working population are self-employed. Of these, 46% describe themselves as "trades people" with few having formal qualifications above level 3 (less than 20%). We would propose that the economy and its potential would be strengthened if the Socio-Economic Analysis might be broadened to capture key information on the self-employed particularly global skill needs with benchmarking across Europe.

At Upper Bann Institute, as a key initiative of our Development Strategy, we have established a Pre-Incubator Centre where Higher Education Students can start their businesses at low rentals for a period of one and half years. They are given support through access to equipment, machinery, expertise of teaching staff as well as mentoring. Furthermore, all full-time students and staff are given opportunities to develop their knowledge and skills in Enterprise and Innovation by enrolling on the Institute of Leadership and Management's Start Your Own Business Programme as well as ILM Exploring Enterprise Programme. There has been not been any additional, ear-marked support to drive such initiatives.

Question 2: What are your views on the Labour Market Analysis relating to the draft ESF Employment Programme?

The Analysis is very comprehensive with Unemployment, Employment, Active and Inactive Groups. We would further suggest that with the improving economy, analysis needs to be undertaken of the skills and abilities being brought into N Ireland of a growing migrant population estimated at over 20,000 people. The presence of migrant workers is not a short term or temporary phenomena, there is a large body of evidence that economic retention and development locally, across Ireland and across the UK are dependent on, and will continue to be dependent on substantial inward migration. This is due to demographic changes and other factors.

Many are over-skilled for the low-level jobs they are currently employed in. Yet, many have excellent skills which are being demanded but there is no reliable capturing of this information. Furthermore, we would propose that strategically this funding would greatly assist establishing signposting systems

and processes in place for the migrant population to access higher skilled positions.

Question 3: What are your views on the proposed strategy, priorities, key areas of expenditure and indicative allocations, with the focus on Lisbon Competitiveness priorities, for the ERDF Competitiveness Programme?

We see the two priorities of –

- Increasing investing in R&TD and promoting innovation; as well as
- Enterprise and Entrepreneurship as key issues needing funding.

In both priorities, a range of European, national and regional policies and strategies have demonstrated the need for business to engage in R&D and innovation in order to increase global competitiveness, increase economic growth and create greater levels of wealth.

Many of the policies and strategies recognised, and sought to enhance through various support programmes, the role of Higher Education (HE) and Further Education (FE) in addressing this need through knowledge transfer in a collaborative approach. Both groups are in strategic roles eg FE is moving to larger units of operation ie 6 Colleges instead of 16 with much potential for development and support to small businesses in the local economy.

Innovation may be developed in a number of ways. For example, Business Process Reengineering (BPR) is a key method in which businesses may become more efficient and modernise. Business process reengineering transforms a business in ways that directly affect performance. The two cornerstones of any business are its people and the processes. If individuals are motivated and working hard, yet the business processes are cumbersome and non-essential activities remain, business performance will be poor.

Business Process Reengineering is the key to transforming how people work. What appear to be minor changes in processes can have dramatic effects on cash flow, service delivery and customer satisfaction. Even the act of documenting business processes alone will typically improve efficiency by 10%. We would wish that the proposals on funding allow applications for this to be made.

Question 4: What are your views on the proposed strategy, priorities, key areas of expenditure and indicative allocations, with the focus on Lisbon Employment priorities, for the ESF Employment Programme?

We are in agreement with the inter-related priorities of

- Helping people into sustained employment; and
- Improving workforce skills and adaptability.

We would suggest that this includes helping people start their own businesses as well as into general employment.

In improving workforce skills and adaptability, we would propose that business owners of a certain size i.e. less than 20 – no employees are given priority. In Northern Ireland this group may be further analysed –

0 employees 79,600

1 – 4 employees 21, 985 enterprises

5 – 9 employees 6,735 enterprises

10 – 19 employees 3,715

There is little evidence of a range of economic support for small businesses being encouraged to grow, up-skill and increase their workforce.

Question 5: What are your views on the proposed cross cutting themes for both Programmes of ensuring equality, promoting good relations and sustainable development, and creating sustainable communities?

We would endorse the key themes of these themes as crucial, under the Section 75 equality requirements. However, we would suggest including Homophobia as a cross-cutting theme.

Crime in Northern Ireland is at its lowest level. For example, in comparing reported crimes in 2003/4, it fell from 127,953 in 2003/04 to 118,124 in 2004/05, which represents a decrease of 7.7%. However, N Ireland has a major problem of homophobic crimes. The number of reported homophobic crimes in Northern Ireland has increased by 176.1%, according to a recent Police Services Report.

This is a crucial problem and any incident is unacceptable in any society and this area needs a strong focus attention and sustainable action.

Question 6: What are your views on the proposed management and implementation arrangements for both Programmes, including the simplified delivery structures, co-ordination arrangements with other Community Programmes and technical assistance proposals?

We would welcome the simplified delivery structures, co-ordination arrangements and would support the technical assistance proposals. We would request, however, that consideration be given to the Audit systems that are put in place. These must be workable and reflect the level of the funding awarded.

UUP

Introduction

The Ulster Unionist Party is committed to working for a stable and peaceful Northern Ireland within the Union, building a competitive and growing economy, securing a fair and just society, and ensuring the sustainability of our environment.

It is of deep regret to me that once again Northern Ireland's bid for EU structural funding is being made in the absence of a locally elected, devolved administration. Whilst we appear on the cusp of a return to devolution, the future of EU structural funding would have benefited significantly from the input of a local executive.

ERDF Competitiveness Programme Priorities

Despite the absence of devolution it is still vitally important that there is greater strategic alignment of structural funding with the domestic policies and priorities set by the direct rule administration. Using EU structural funds to achieve the regional strategy is vital. With much less money available there must be a high level of national strategic and tactical fit.

I am fully supportive of the Lisbon agenda, with its aim of building a regional, dynamic, knowledge based economy and what it seeks to achieve for the EU and its member states. However, I am and have been disappointed that, to date, member states and the commission have paid mere lip service to its implementation.

I welcome wholeheartedly the focus in this current round of EU funding on the Lisbon agenda and the earmarking of activities, under the competitiveness objective, in line with the Lisbon agenda. It is clear that Northern Ireland needs more Lisbon, not less. Regional aid spending is the second biggest item in the EU budget, accounting for 30% of total spending in 2005 and because regional aid spending accounts for such a substantial chunk of the EU's expenditure, it is only right that the spending be Lisbon focused.

I welcome the broad thrust of the priorities identified in the draft ERDF programme but would like to see them reorganised to include a new priority on addressing Northern Ireland's chronic infrastructure deficit in the east and west.

Priority 1: Increasing investment in R&D, promoting innovation and enterprise. (£300 million)

Priority 2: Protecting and enhancing the environment. (£60 million)

Priority 3: Creating an efficient, accessible and modern transport and digital infrastructure. (£57 million)

A competitive, innovative and dynamic economy requires an efficient, accessible and modern transport and digital infrastructure. This means having

a public transport fit for purpose in the 21st Century, a road network which can support the needs of businesses and communities and maximising the opportunities provided by broadband and other digital technologies.

Without doubt, as most economic indicators would suggest, Northern Ireland's economic situation has significantly improved in recent years but as a region of the UK we still lag behind our counterparts in the rest of the country. We have enjoyed sustained economic growth of around 2.5% - 3% per annum but despite this unprecedented growth we still fall behind the UK and EU average in many key Lisbon areas such as competitiveness, productivity and skills. Therefore it is important that the future competitiveness programme uses EU structural funds in such a way that improves Northern Ireland's performance in these key Lisbon areas.

Northern Ireland's expenditure on research and development is worse than the UK average, which in turn only hits the EU – 25 average of 1.9% of GDP, by business and public sector combined. This stands in stark contrast to Sweden and Finland who spend 3.7% and 3.5% respectively on R & D. Northern Ireland needs to be emulating this level of R & D expenditure if it wishes to sustain economic growth. Future EU structural funding must contribute to this spending.

Draft ESF Employment Programme Priorities

In the 21st Century building a flourishing economy means equipping everyone with the skills and training to face that challenge. The gap in basic skills in Northern Ireland stops us from fulfilling our economic potential. Knowledge – based economy needs sustained investment in quality training and world – class research and development.

Reversing the worrying trend where each year thousands of our brightest students leave Northern Ireland to study in other UK regions must be a priority of any future devolved administration. The 'brain drain' as it is more commonly known starves our local economy of the indigenous skills base it needs to drive forward a dynamic, knowledge based economy.

Programme Delivery

In addition to the problems posed by the RPA there is also the ongoing review into the structure and number of central government departments. Northern Ireland is over governed and over burdened with an excessive network of government departments, quangos and other statutory agencies.

The department of finance and personnel has a substantial role to play in the negotiating, co-ordinating, management and monitoring processes of EU funds in Northern Ireland. Any change in its make – up, whether it merges with or loses responsibility to another Government department would have a significant impact upon the delivery of European funding. Those preparing programmes must take this into consideration alongside the effects of the RPA.

The reduced funding context also means it is essential to secure greater benefit from structural funding delivered to Northern Ireland and that funding is used efficiently. That means future delivery structures must focus on reducing the bureaucratic burdens associated with the delivery of structural funds.

WEST

The Western Economic Strategy Team launched in November 2006 as WEST, (formerly Innovation West) comprises the District Councils of Tyrone and Fermanagh (Cookstown, Dungannon and South Tyrone, Omagh, Strabane and Fermanagh) along with partners from Invest Northern Ireland, Department of Agriculture and Rural Development, Department of Employment and Learning and private sector representation, welcomes the opportunity to respond to the EU Structural Funds, Northern Ireland Competitiveness & Employment Programmes 2007-2013.

WEST has adopted a strategic role, and currently focuses on lobbying central government, proactively responding to new economic challenges, bidding for infrastructural investment, and collaborating with other regions.

A Strategy and Action Plan for the period 2006 to 2008 has been developed with the aim of promoting greater co-ordination and cohesion amongst economic support agencies in the Western sub-region and to strategically position the region as a place to do business. The implementation of this Strategy and Action Plan will require WEST to work proactively in partnership with key economic development stakeholders in the region.

WEST welcomes the opportunity to contribute to the consultation on the NI Competitiveness & Employment Programmes for 2007-2013. While individual councils may also choose to submit a response that reflects their local situation this joint response comments on those issues that are common to all five district council areas. WEST has also contributed to the NILGA response,

Consultation Questions:

Question 1: What are your views on the Socio-Economic Analysis relating to the draft ERDF Competitiveness Programme?

The western sub-regional group of Councils broadly accept the Socio-Economic Analysis, however, it does not take into account regional disparities. We would suggest that consideration be given to the economic strengths/weaknesses to take account of the east west split in Northern Ireland and the past and current disparities that exist in relation to productivity, enterprise, knowledge and innovation, transport and infrastructure, skills, and employment. Northern Ireland is not one homogenous region with similar problems requiring a 'one size fits all' approach and the western sub-regional area of the Province possesses its own issues including:

- a) Its peripheral and dispersed rural location
- b) A strong dependency on the agricultural sector which is currently shrinking
- c) Western sub-regional area ranked in the top 11 most deprived Local Government Districts in Northern Ireland in terms of the multiple deprivation measure

- d) Higher than average unemployment levels compared to other parts of NI
- e) Need for infrastructure investment in both roads and telecommunications
- f) Suffering from the downturn in manufacturing
- g) Little or no foreign direct investment
- h) Plethora of small businesses/high dependence on SMEs
- i) Below average employment in the public sector (with the exception of Omagh)
- j) Average weekly earnings below the Northern Ireland average
- k) Very little access to Research & Development in the WEST

It is essential in terms of addressing the challenges that is flexible enough to take into account the differences in EAST/WEST, as one size does not fit all.

The number of migrant workers seeking employment is also a key feature in the west of the region. It is important that future EU measures seek to support the mobility of labour across Europe not only in pure economic terms but also for the social and cultural development that complements it.

Question 2: What are your views on the Labour Market Analysis relating to the draft ESF Employment Programme?

The WEST grouping broadly accepts the Labour Market Analysis as it highlights the weaknesses in the labour market namely; significant numbers of people with poor educational attainment; economic inactivity; skills gaps; low productivity and low entrepreneurial activity. It is seen as giving a fair reflection of Northern Ireland's current labour market and sets the strategic context for the Programme. However, it is felt that although some issues such as long-term unemployment are an issue, they are not equally balanced throughout Northern Ireland and the WEST again suffers from this imbalance. It is more difficult for people in the WEST to access employment and if they do achieve employment with the small firms available and require training, most of the SMEs are not in a position to release full time employees for this training.

It was strongly felt that the ESF Employment Programme must fully compliment the ERDF Competitiveness Programme and address other issues such as: need for labour force flexibility; address poor educational performance and brain drain; low paid jobs within the retail and service sectors; issues within rural communities and the increasing numbers of migrant workers within the labour force.

It is felt in the WEST that incentives should be given both to the Employers and the Graduates to encourage them to stay in the WEST, as it is these graduates that will help to grow the WEST.

The WEST also feels that there are hidden reserves in employment and severe need to address the benefit trap in this area. Again, as the average weekly earnings in the WEST are lower than elsewhere it is harder for people to become employed.

There is a need to consider the services sector in the WEST as it is currently undervalued but can provide good economical value to the WEST.

Question 3: What are your views on the proposed strategy, priorities, key areas of expenditure and indicative allocations, with the focus on Lisbon Competitiveness priorities for the ERDF Competitiveness Programme?

Role of Local Government

Local Authorities have demonstrated by example over the last decade our capability and competence in managing a series of multi-faceted programmes and projects encompassing a variety of funding streams and thematic areas (eg, economic, infrastructure, urban/rural, tourism, social, etc). We are viewed as the 'key driver' to make things happen at local level, and it would seem in some quarters of Central Government that the role and significance of 'Local Authorities' have been somewhat underestimated going forward under the new round of EU Funding (2007-2013).

The Strategy

Cognisance must be given to the specific needs of local areas when developing Strategy, as clearly a 'one size fits all' approach will not be appropriate to all sub-regions (i.e., east -v- west). Furthermore, it is absolutely essential to incorporate a degree of flexibility within the Strategy, as it is widely recognised that local economic development needs are fluid and will evolve over the life of the new Programme.

ERDF Competitiveness Programme Objective and Priorities

The primary objective of the Competitiveness Programme is to help create a more competitive and sustainable Northern Ireland and specifically, to contribute to closing the productivity gap with the UK. Generally speaking the three priority themes are acceptable, however, it is mainly Priority 2 (Promoting Enterprise and Entrepreneurship) that Local Authorities will be most affiliated with.

Budget Allocations and the Lisbon Agenda

The Review of Public Administration (RPA) will bestow enhanced powers upon Local Government. However, alarmingly the budget allocations earmarked for Local Government do not accordingly match the activities and this is obviously a key issue that requires urgent attention by Government. WEST strongly argues that the budget allocation identified within Priority 2.2 (Local Economic Development) is totally inadequate and therefore recommends a clear need for at least half of the budget for Priority 2.1 (Enterprise and Entrepreneurship) to be transferred to Local Government to deliver upon the enhanced activities

outlined under RPA. Additionally, under Priority 3.1, consideration should also be given to an allocation for Local Authorities to develop Sustainable Energy Projects (i.e., Waste to Energy).

We believe the programme needs to be flexible to take account of the particular needs facing the Western sub-regional area and whilst we welcome an emphasis on research and development we must acknowledge that regional disparities exist and need to be addressed so that the high number of SMEs in the West have the opportunity to access R&D facilities locally, which are not readily accessible at present. It is essential therefore, that there is enough scope in the new programme to allow mechanisms to be put in place to ensure R&D is delivered within the Western sub-region to ensure that SMEs based in rural deprived areas have access to the same level of expertise as those SMEs in the Greater Belfast area. Indeed, we would go further to suggest that it should be a requirement for universities to facilitate outreach within rural areas, and furthermore, those areas not privy to have a university located in their area, should not be discriminated against because of this, but in fact gain additional support to address the vacuum that exists.

Many of the activities outlined as being compatible with the Lisbon Agenda are more programme centred than infrastructure centred and this may present problems both in terms of spend and the achievement of outputs. It is important that 'need' is the key factor in determining the priorities for funding in the next round. This should allow the sub-regions to specifically identify and address the distinct circumstances in their areas, such as the need for major investment in infrastructure in the West to help put us on a level footing with other parts of Northern Ireland.

Overall, greater flexibility for implementation of the Lisbon priorities is needed, with targets set relevant to Councils ability to meet them.

Key Areas of Expenditure:-

Town Centre Regeneration

The health and well being of the sub-regions are underpinned by the vibrancy and strength of our urban centres. It is extremely disappointing that the Competitiveness Programme fails to acknowledge this key fact and suggests that funding for town centre regeneration would be termed as ineligible activity as substantial Government funding from alternative sources is available. This is largely a fallacy, as only a very small proportion of funding can be obtained from Government Departments, such as DSD, DRD, etc, for physical/public realm improvements, neighbourhood renewal areas, etc. In fact, some of our districts are not even classified as neighbourhood renewal areas and therefore, are ineligible to obtain funds under this specific programme. The West sub-region would strongly argue for the inclusion of 'town centre regeneration' as a key priority for funding going forward under the new Programme. This would provide a true exemplar of economic development and regeneration at a local level, and allow our key provincial towns to maintain their competitiveness and

vibrancy. In fact, it is hard to imagine any other programme that would demonstrate and deliver greater economic and competitive outputs.

Importance of the Small Business Sector

The Western sub-region is unequivocally dominated by the small business sector, in that 99% of the area's 10,415 businesses employ fewer than 50 people. Much work remains to be done to assist this key sector, such as elongating the business support mechanisms to help SMEs grow and develop, as well as encouraging others to take the first step towards entrepreneurship.

Tourism

Under Priority 2.4 (Signature Tourism Projects), there is a distinct need to ensure that the development of signature tourism products are geographically spread throughout Northern Ireland, and not focused solely upon those areas in the north and east where perhaps the larger visitor attractions are located.

Question 4: What are your views on the proposed strategy, priorities, key areas of expenditure and indicative allocations, with the focus on Lisbon Competitiveness priorities for the ESF Employment Programme?

The western sub-regional group of Councils welcomes the approach taken, although would suggest consideration be given to the following:

The Strategy

The western sub-regional Councils welcome the fact that cognisance has been taken of the wide range of current Employment Strategy documents in formulating the ESF Employment Programme. This approach has also been taken by the western sub-regional Councils in the recently produced West Strategy and Action Plan (2006-2008).

It would be the western sub-regional Councils' recommendation that the West Strategy and Action Plan should be embraced by the new ESF Employment Programme. The vision of WEST is to be recognised as a world class outward and forward looking region that respects and values its people, offering opportunities and a high quality of life. The strategic aims identified in the WEST Strategy are to:

- Promote greater co-ordination and cohesion amongst economic support agencies in the region;**
- Strategically position the WEST region as a place to do business.**

The strategy and justification of spending priorities for the ESF programme also needs to recognise issues at a local level and incorporate these, as a strategic approach that does not recognise local factors will not be able to effectively support those people and communities in most need of support or benefit from this programme.

The Priorities

The two priorities will provide a framework that will assist people to gain meaningful employment and further improve employment opportunities, however consideration must be given to the following:

A Flexible Approach

In the case of the western sub-region the priorities must be flexible to permit this area to deliver on the specific actions set out in the West Strategy and Action Plan (2006-2008) such as developing a cohesive approach to identifying and addressing gaps in the provision of economic support (eg, skills development programme) and to develop more formal working relationships with other economic support organisations, including the Further Education Colleges in the western sub-region.

By doing so, there would be better opportunity to provide innovative approaches, and develop local solutions that will assist in best delivering the objectives set out by the priorities.

This will allow training support for people with no qualifications to be delivered in their own communities; higher skills to be delivered in the work place and new opportunities in third level and post graduate level to be delivered through meaningful linkages with Further Education and University outreach. It should be noted, however, that the western sub-region is currently at a distinct disadvantage as there is no university or appropriate university outreach in the area.

Integral to this approach must be the ability to supply child care, transport and differing forms of sheltered employment.

It is also strongly felt that the ESF budgets should not be used to meet the shortfalls within, for example the health and education budgets.

Local Economic Development

The western sub-regional councils must be given a genuine opportunity to engage, influence and be part of the delivery of the priority themes being delivered by DEL under the ESF Programme. This will ensure that additional resources are allocated to the areas, sectors, businesses and individuals of most need within the West and will contribute to the advancement of employment skills.

Priorities for this disadvantaged region of Northern Ireland should include:

- Investment in further and higher education, eg, industry-relevant PhDs, etc.**
- Provision of incentives for graduates**

- Requirement of universities to provide appropriate outreach facilities, particularly in rural areas
- Recognition of the hidden reserves of manpower, including those who have fallen into the benefits trap, ie, long-term economically inactive
- Recognition of the nature of employment opportunities in micro-businesses
- Recognition of employment opportunities in renewable energies
- Recognition of the dependency on public sector employment and agriculture
- Recognition that second level attainment would not necessarily guarantee future employment

Focus of the Lisbon Priorities for the ESF Employment Programme

The western sub-regional councils recognise the purpose and value of delivering the programme to the standards set by the Lisbon Competitiveness Agenda, however, as stated in Question 3 we do have reservations about such a large proportion of the budget allocations being focused on Lisbon given that this region lags behind other parts of the province as pointed out in Question 1.

Consideration must be given, however, to the narrowness of the Lisbon Agenda definition and its deliverability in this region because of the unique difficulties experienced in the west and the clear east-west split within Northern Ireland, including, as highlighted above the lack of university or the appropriate out reach facility provision to advance R&D.

However, to successfully deliver on the Lisbon Agenda, the programme must take into consideration these issues and then the Agenda should be proportionally (by sub-region) and consistently applied by all programmes throughout Northern Ireland.

Question 5: What are your views on the proposed cross cutting themes for both programmes of ensuing equality, promoting good relations and sustainable development, and creating sustainable communities?

The cross cutting themes for both programmes of ensuring equality, promoting good relations and sustainable development, and creating sustainable communities was welcomed. These themes were viewed as being important across both programmes as economic and social issues are interlinked. It was also noted that increased promotion of the cross cutting themes would assist in reducing duplication

Question 6: What are your views on the proposed management arrangements and implementation arrangements for both programmes, including the simplified delivery structures, coordination arrangements

with other Community Programmes and technical assistance proposals?

Generally the strategic management structures outlined are welcomed, particularly in relation to the sub-priority on local economic development, as this does not vary greatly from current working arrangements between local government and DETI.

However, as noted earlier, the document provides a very narrow remit for local government, this is very disappointing given the vast range of experience local authorities have in managing and delivering a diverse range of programmes over the past ten years. Councils, because of their local knowledge, previous experience and particularly because of their key position in local communities, should have a much greater role in the delivery of the programme.

Related to this is the need for resources and funding at local authority operational delivery to ensure the effective implementation of programmes and associated outputs. The document states that appropriate technical assistance will be made available to support partners in the non-government sector to participate in the implementation of the programme. It is essential a standard approach is taken towards the provision of technical assistance. Clarification is needed on the allocation of funding available for technical assistance for local authorities. Resources for technical assistance are absolutely essential for the effective implementation of the programme.

A standard approach is required across all Council areas in terms of programme development, documentation, etc, to ensure a co-ordinated approach to the delivery of programmes and to try and reduce the bureaucracy associated with the current programme. It is recommended a Co-ordination Working Group should be established to enable an increased level of 'joined up' local and central government. This Group should ensure the rules, regulations and procedures for the programme are in place at the beginning. It is also recommended ongoing training in the procedures developed is provided for local authority staff involved in the management and delivery of the programme.

The document states a Monitoring Committee and Programme Monitoring Committee will be established. It is important these committees should have representatives from local authorities throughout Northern Ireland in order to take account of the disparities that exist within the region.

Given the fact that the Competitiveness and Employment programme is only one of a number of EU funding programmes due to commence in the near future it is essential there are robust and ongoing working relationships established among the various funding bodies in order to prevent duplication of funding.

Finally, during the delivery of the Building Sustainable Prosperity programme there were problems developing some projects due to the complex rules surrounding State Aid. It is essential clarification on State Aid rules is provided

at the outset in order to prevent confusion during the roll-out of the new programme.

Women's Support Network

The Women's Support Network (WSN), established in 1989, is an infrastructural, umbrella organisation, which provides support and services to, and represents over 30 groups (mostly in the Greater Belfast area), including community-based women's centres, women's projects and women's infrastructure groups.

WSN aims to achieve social, political and economic justice through the promotion of the autonomous organisation of women. The Network aims to strengthen the collective voice of women's groups and to promote and develop networking opportunities, to enable collective action and to impact upon policy and decision making processes. We provide an accessible, relevant and high quality support service and resource for member groups. The Network is also an important information provider on issues relevant to community-based women's organisations and for other infrastructure groups, nationally and internationally.

We welcome the opportunity to respond to the current consultation on the Operational Plan for the NI EU Competitiveness and Employment Programme (2007-2013). Brief comments we wish to make in relation to the consultation document are outlined below.

- The Operational Plan lists a number of NI government strategies that will be used to inform the implementation of the programmes. We would ask that the Gender Equality Strategy (2006-2016) also be used to inform the programmes. There are strategic objectives within this strategy which fit well with the general aims of the Competitiveness and Employment Programme, specifically;
 - To ensure the economic security of both men and women
 - To achieve equal value for paid work done by women and men, and promote their equitable participation in the paid and unpaid labour force
 - To ensure women and men, including girls and boys, shall have equal access to education and lifelong learning

- WSN particularly welcome that 'Equality and Good Relations' is to be a cross-cutting theme for the programmes. We would urge that government view the concept of 'equality' pro-actively utilising funds to ensure there is a reduction in inequalities eg. gender discrimination in the labour market. It is no secret that women experience greater and sustained discrimination in the paid labour market. Only recently The 'Equalities Review Panel' found that women with a partner and a child aged under 11 were 45% less likely to be in work than a partnered man. The report, 'Fairness and Freedom' suggests that women with young children face more discrimination in the workplace than disabled people or people from a minority ethnic background.

- It is true that the gap between male and female labour market participation must be bridged but the issue of women being hugely over represented at the lower levels of the labour market must also be addressed if gender equality is to be progressed. We therefore believe that these issues must be fully considered and taken into account when drafting the final operational plan and drafting criteria for the dissemination of funds.

- WSN would also suggest that non-accredited training must be valued within the programmes. It is our experience that women, particularly women experiencing socio-economic disadvantage, need time to progress into accredited training provision with lack of self confidence being a major barrier that must initially be overcome. Simultaneously, the provision of childcare is a vital equality issue, enabling women to update skills and access training to enhance employability.

In conclusion, we would ask that the above recommendations, which would greatly assist in the promotion of gender equality, be carefully considered and included in the operational plan.

Yours Sincerely,

Lynn Carvill
Policy and Research Co-ordinator
(on behalf of the Women's Support Network)

Women's Resource and Development Agency

Introduction

The Women's Resource and Development Agency ("WRDA") was established in 1983 with the objective of advancing the participation, inclusion and equality of women, working for the benefit of their own communities and society in general.

The organisation continues to focus its efforts on working with and through women and community organisations located within disadvantaged and/or divided communities.

By strengthening the role and position of women in their own communities, it is anticipated that wider community change will be brought about, leading to the advancement of the broader vision for peace, reconciliation and social inclusion.

WRDA through its membership of over 60 groups recognise the importance of the following key areas in ensuring continuous progress: training, development, education, building community capacity and working towards social and policy change.

WRDA has received funding through Awards for All to organise a series of policy consultations on matters of importance to women in Northern Ireland. An event funded through Awards for All to discuss the NI EU Competitiveness and Employment Programme (2007-2013) was held in partnership with the Training for Women Network (TWN) at the TWN premises on 6 March 2007, attended by thirty individuals representing women's training and development groups from around Northern Ireland.

The following response is derived primarily from the discussions that took place at this event.

Labour market analysis

The economic and labour market analysis that provides the rationale for the programme is one with which all would agree, in terms of a commitment to increase enterprise, increase the employment rate for all groups in the labour market, reduce the numbers of economically inactive and to improve the skill and qualifications of existing employees. However, we strongly urge that this analysis be gendered, so that the differential impact of all programmes upon women can be considered. If this is done, then the target groups for all programmes will become much clearer. For example, a common feature of all

labour markets is the fact that women have higher rates of economic inactivity than men. In Northern Ireland, the male inactivity rate is around 23% while the female rate is around 37%, a full 14 percentage points higher (Economic Inactivity, Research and Evaluation Branch, DEL). Just over one quarter of the economically inactive are those looking after the family or home and the vast majority – 80,000 are women. The Labour Force Survey has indicated that around a fifth or a quarter of this group would like a job if one was available. Approximately 14,000 women are therefore economically inactive and not necessarily seeking work but would like to work if that was possible.

We believe that if this fact were to be clearly stated in the Programme, then the necessity for having specific actions for women, such as the current Advancement of Women in the Building Sustainable Prosperity programme, becomes clear.

The goals of the Lisbon Agenda cannot be furthered unless women are targeted for inclusion in training and employment programmes. However, if this is to be successful, the reasons for their economic inactivity need to be addressed. Those who are not women, but who are disadvantaged through physical or mental disability, or who require essential skills training should be eligible for training, but the majority focus should be on women.

Childcare

Lack of childcare provision remains one of the biggest barriers to employment for women. The need for childcare must be made central. Direct childcare provision must be available in employment and development programmes if women are to be able to access such programmes. Childcare projects should therefore be included in the C & E Programme.

Training courses

One area of great concern is that of the different levels of training programmes eligible for funding. Many women's organisations offer non-accredited training, which has been proven to be an essential first step for many who do later progress to accredited training and employment. If non-accredited courses are not eligible for funding, then any possibility of moving economically inactive women into training and employment will fail.

Level 1 and 2 training is no longer considered eligible for government funding, which has posed a great strain on community-based groups as they attempt to access alternative funding sources. There was a consensus that responsibility for Level 1 and Level 2 training should remain with government, but that European funding should also include Levels 1 and 2. In addition, it was agreed that European funding should support a range of training programmes, enabling the development of a progression route from non-accredited courses up to Level 5. In this way an individual would be able to develop the necessary skills for the employment market while receiving the initial necessary support at community level.

Match funding

Match funding continues to pose a major obstacle for organisations, deterring many from making worthwhile applications. We accept that match funding can be beneficial in providing additional support to a project, but we would ask that serious consideration is given to the possibility of government departments finding or co-ordinating a register of potential match funding partners.

Cross cutting themes

It was agreed, in terms of a cross-cutting emphasis on equality, that gender equality should be at the heart of both programmes. We would draw attention to Directive 2006/54/EC of the European Parliament and of the Council, on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation and in particular, to Article 3, which enables member states to adopt positive action measures 'with a view to ensuring full equality in practice between men and women in working life.'

STRUCTURAL FUNDS CONSULTATION 2007 TRAINING FOR WOMEN NETWORK/WOMEN'S RESOURCE AND DEVELOPMENT AGENCY

Introduction

An event to discuss the Structural Funds consultation and its impact on the women's training and education sector was held in partnership between Training for Women Network (TWN) and the Women's Resource and Development Agency (WRDA) at the TWN premises in Belfast on 6th March 2007. There were 30 attendees representing women's training and development groups from around Northern Ireland.

The Head of the European Division of the Department of Finance and Personnel gave a presentation on the outline proposals for consultation. There were opportunities for questions and then participants broke up into two groups to discuss two key questions:

What do you see as the role of women in the new Structural Funds?

How do you see women's training and development projects fitting in to the proposed programmes in practical terms?

Comments from the two groups were fed back and there was a general discussion on these themes and other issues that participants wanted to explore. The following comprises notes from the sessions, comments on the evaluation forms at the event, additional comments supplied by e-mail or points that were raised during discussions.

The Structural Funds and Women

Gender needs to be mainstreamed through the proposed funding programmes, which means that the detail of the programmes must be written with a gender view and take into account differential impacts on gender. Specific actions for women, such as the current Advancement of Women in the Building Sustainable Prosperity programme need to be maintained.

The resources for achieving the Lisbon Agenda targets are women, as they remain the greater economically inactive group, face barriers to certain kinds of employment, are under-represented in terms of entrepreneurship, still experience a significant pay gap compared with male earnings and experience barriers to progression and employment in non-traditional areas.

Making the primary target women's advancement would therefore contribute most to Lisbon targets.

The government priority for bringing more lone parents into employment affects women primarily and this can be augmented by work under the Structural Funds. The need for childcare also has to be highlighted in the Structural Funds. While childcare is an eligible expenditure for EU funds, direct childcare provision at the point of access, for example to training and development, makes this more accessible, easier to account for and improve retention. Childcare projects should therefore be included in the Structural Funds.

Practical Considerations for Projects

There are concerns that support-based networks will fall through the funding net, as they do not deliver employability activities directly, but are an essential part of the access path for many women. This is a particular issue as the government department focus has become more targeted at direct employability outcomes and Level 1 and 2 training is no longer considered eligible for training. There is a concern that it might be assumed that European Structural Funds are expected to pick up Level 1 and 2 training as it is dropped from government funding, which raises an additionality question.

Conversely, a concentration on Levels 1 and 2 suppresses potential and restricts the level of qualifications for those wanting to progress. Those organisations wanting to provide seamless support through a range of levels of progression will have to access different sources of funding at each stage, some of which can be problematic, considering the development of colleges of Further Education to be run more as businesses, the focus on tangible employability outcomes and the reduction of investment in community-based training foreseen by current policy development in the area of colleges.

The design of the Structural Funds programme would make more sense to provide the capacity for organisations to offer progression from non-accredited access courses, through Level 1 and 2, with progression up to Level 5, so that continuous support and local access can be provided from entry to employment. There is also the question as to whether non-accredited courses – an essential first step for many women – will be eligible for funding. This would have to be included to ensure an integrated access and progression route for community-based activities, particularly those aimed at the long-term unemployed or women wanting to return to work after bringing up a family or other caring commitments.

There is concern over the focus on economic inactivity, as economically active women are often also living in poverty, part-time work moving them from the category of 'economically inactive', but receiving little more than when on benefits in real terms. Many women may not access training and development if the focus is on employability alone, as the activities may not

be relevant to their personal situation. Funding programmes need to cater for two types of women: those accessing training and development with no qualifications and those needing to update or enhance their existing qualifications.

Finding match funding has been a major issue for many organisations accessing the Funds in the past and it is welcomed that part of the 50% match funding will be met at the access point. While the rationale for match funding is acknowledged – that of bringing in interest or expertise from elsewhere to strengthen a project – the consensus is that match funding should be provided or at least co-ordinated by the administering government department. The fact of a project being successful on application should be sufficient to have the match funding in place, rather than busy organisations having to secure pledges of match funding from elsewhere, some of which may not be honoured or given at a reduced amount.