

**FINANCE AND CONSTITUTION COMMITTEE
FUNDING OF EU STRUCTURAL FUND PRIORITIES IN SCOTLAND POST-BREXIT
SUBMISSION FROM COLLEGES PARTNERSHIP**

1. How should Scotland's share of post-Brexit structural funding be determined? (for example, should it be on measures such as GDP, needs-based, via the Barnett formula; match funding or based on competition?)

This should be viewed as an opportunity to remedy the ills that have developed in managing funding from the European Union (EU) in recent years whilst maximising Scotland's due and justifiable share of the resources that will be available. Colleges Partnership believes the minimum target should be for Scotland to secure 'no less than in the current programme period'. In supporting the position of the Scottish Government (SG), Colleges Partnership notes that Scotland's due share is €3.024 billion. This is based on the fact that the five component parts of the European Structural and Investment Funds (ESIF) amount to €315 billion for the whole of the EU for the 2014 to 2020 programme. The UK contributes 12% of that total and this is the amount that would be expected in replacement funds. As Scotland accounts for around 8.4% of the UK, it should expect no less than €3.024 billion. This figure does not take into account the amount of UK regional development funds that were removed when European funding was introduced.

In addition it is important that SG stresses that there are other EU funds from which Scotland is due a fair and proportionate share. These are listed in the annex at the end of this response. Colleges Partnership highlights the need for the UK Government to adopt a position with regard to these programmes that is coherent for the UK as a whole and that participation is pursued - in programmes like the Erasmus+, Horizon 2020 and Culture programmes – that support and reinforce the aspirations and priorities of all four nations, particularly those which see the benefits they offer in maintaining existing international relations and building new ones. To that end, it is worth remarking that in its Multiannual Financial Framework package for 2021 to 2027, the EU has decided that three existing programmes to which the UK has access will be absorbed into ESIF. These are the EU programmes for Health (€0.45billion), Employment and Social Innovation (€0.92 billion) and the competitiveness of small and medium-sized enterprises (€2.3 billion). So, on the basis of the aforementioned rubric, it should be expected that Scotland's share from these three elements of the new ESIF would be a further €37 million. This would bring the overall value of Scotland's anticipated share to some €3.2 billion. It is important that Scottish Government is aware that various financial gymnastics are likely to be applied to seek to convince them that merging of different funds will result in a lesser amount of overall funding being available.

The European funds listed in the annex are targeted at areas of devolved responsibility. So, the argument for SG to control any resources which come from them is coherent. This could bring an additional resource to Scotland of around €0.5 billion. More importantly SG and the committee need to recognise the existence of these funds and take account of them to ensure that any resource which comes from them is applied synergistically to ESIF replacement funding. Thereafter, it is important that the UK Government is unequivocally reminded of their existence, scope and scale and that Scotland will be entitled to a proportionate share of any replacement funds. This should be perceived as helpful as the Conservative Party Manifesto for 2017 stated that it would use the structural fund money coming back to the UK, post-Brexit, to create a UK Shared

Prosperity Fund (UKSPF) designed, specifically to reduce inequalities among the four nations of the UK.

2. Should the existing structural funding priorities be retained for any new funding approach post-Brexit or are there other national or regional outcomes, strategies or plans to which future funding should align instead?

Colleges Partnership's comments on this take account of the priorities that the EU has set for its 2021 to 2027 programmes. This is because, in the absence of any clarity on the UK's relationship with the EU, post-Brexit, it is sensible to assume that SG would continue its current alignment with the EU's priorities. Furthermore, the EU adopts a strategic approach to its programming for 2021 to 2027 which covers all funding programmes. Colleges Partnership anticipates that SG will try and maintain that strategic alignment, even for those programmes in which participation will be as a third country. Failure to do so could undermine any applications from Scottish organisations to EU programmes in which the UK will participate as a third country.

In line with its programme for simplification, the EU has established five broad policy objectives. This is a welcome improvement from having 11 thematic objectives, which was the case for the 2014 to 2020 EU programmes. The five policy objectives are:

- a smarter Europe: through innovation, digitisation, economic transformation and support for SMEs.
- a greener, carbon-free Europe: implementing the Paris agreement and investing in energy transition, renewables and the fight against climate change.
- a connected Europe: investing in strategic transport and digital networks
- social Europe: delivering on social rights, supporting quality employment, education, skills: social inclusion and equal access to healthcare.
- Europe closer to its citizens: locally-led development strategies and sustainable urban development.

These align well with SG priorities, which is positive. Colleges Partnership feels that the current ESIF programmes in Scotland adopt a much narrower focus than the programme for 2014 to 2020 allowed and that this has been to the detriment of fully achieving the programme's potential.

Colleges Partnership, also, sees these five broad policy priorities as being appropriate in supporting the key pillars of economic growth and cohesion in Scotland – business growth, skills development and inclusion.

It is unclear at this stage whether the new fund would be wholly or partly targeted on smaller geographically defined areas or have a Scotland-wide focus. Any major shifts in the coverage or targeting of the scope will bring challenges to organisations and sectors that are expecting a replacement for existing EU activity and income, which is what has been inferred in establishing the fund. However, this should not be a factor that receives undue weighting in any decision on how the new funds are targeted.

Our six partner colleges - City of Glasgow, Glasgow Clyde, Glasgow Kelvin, New College Lanarkshire, South Lanarkshire College and SRUC (Scotland's Rural College) - which

serve between a third and half of Scotland, are keen to participate more fully in the new programme than was the case in 2014 to 2020 ESIF. Unemployment in Scotland is relatively low and there are existing and emerging skills gaps in fields in which SG aspires to make an impact like providing additional child care, more sustainable approaches to agriculture, developing Scotland's tourism offer and reviving rural economies, etc. So, the fund replacing ESIF should have a sharper focus on upskilling those who are already in employment and helping adults return to or re-enter the labour market. This approach may also address underemployment and precarious employment whilst supporting social inclusion and confronting inequality. After all, the acquisition of skills is an initial step to sustainable and worthwhile employment and combating poverty and exclusion. The six colleges in the Partnership have the capacity to make a significant contribution to this – as individual institutions, regional or sector collectives or in partnership with other local and national agencies. In order to achieve this colleges would need to be freed from focussing, solely, on educating and training young people.

An issue which is pertinent to all colleges is upskilling the sector's workforce. The delivery of skills education is undergoing transformational change that will continue for the next decade and beyond. Consequently, it is necessary that colleges - the statutory providers of skills education - are able to respond to the challenges and needs of the fourth industrial revolution. This will demand an increase in the provision of work-based, digital and episodic learning and more responsive forms of professional and technical accreditation. There should be scope for this in any capacity building element of the new fund. At the same time as colleges respond to these changes there remain communities where unemployment and poor educational outcomes persist. The physical location of our six partner colleges means that these will continue to be challenges for them to address. Therefore, Colleges Partnership contends that an element of the new fund should consider bottom-up locally-devised solutions to developing appropriate interventions and not simply repeat what has gone before. The inclusion of Health as a priority may provide an accelerator for considering new solutions as the aforementioned areas also have the poorest health outcomes.

Brexit has fractured UK and Scottish society and this is manifest in the perception of migrants who have come to make a contribution to the UK's economy. The new programme should specifically invest in activities to remediate this and promote active and global citizenship. This would help rebuild and strengthen the social bonds in local communities.

In conclusion, Colleges Partnership is no less convinced than it has been in previous EU programmes of the need for better and more integration across programmes and better , less risk-averse management to make full use of the funding available and stop the drift to gold-plating of regulations and the focus on it to the detriment of effective and innovative projects.

3. In terms of the proposal for a UK Shared Prosperity Fund - where should the responsibility for any decisions about funding levels and allocation be taken (for example UK Government, Scottish Government, Local Government or local stakeholders) and what level of autonomy should they have in deciding how funding is allocated?

Much of the information that Colleges Partnership has acquired from attending seminars organised by the UK Government gives the impression that the new fund will bypass the devolved administrations in Scotland, Wales and Northern Ireland and be driven via City

Regions. This seems contrary to the views expressed in the UK Government's White Paper on the UK's exit from and new relations with the EU, which states that "We have already committed that no decisions currently taken by the devolved administrations will be removed from them and we will use the opportunity of bringing decision making back to the UK to ensure that more decisions are devolved."

Previous experience of EU funding demonstrates the value of local decision-making in understanding need and identifying capacity for delivery in an area whilst maximising the use of genuine local partnerships. In addition, this approach helps sustain local commitment and accountability.

More prosaically, the administrative and regulatory aspects of the programme need to take account of existing systems in order to ensure that a disproportionate investment is not needed in new computer and administrative systems.

Colleges Partnership has a clear preference for the programme to be managed at devolved government level but the decision-making process on developing and managing the programme needs to be clear and transparent.

A further danger from managing the programme at a UK level is that elements of public service in England have been opened up to private organisations. Managing the programme at UK level would mean that SG would have to follow this approach. Regardless of any political perspective, a crucial weakness in removing devolved delivery and management would preclude Scottish public bodies from using their core funding to support targets and outputs for the new programme.

Local stakeholder involvement is important in defining priorities for funding and this extends to those organisations which, currently, apply for EU transnational funding. This will be increasingly important should the UK be eligible as a third country for various transnational programmes which, as we maintain, should complement activities and priorities supported by the new UK programme. The current arrangements for managing ESIF have not done this effectively and a new approach is worthy of consideration. Colleges Partnership has previously submitted detailed papers to SG on how a new approach to managing and optimising funding for Scotland may be organised. Whatever happens regarding programme management for the new programme, it requires informed ministerial oversight to ensure that transparency is not undermined by officials cloaking it in a veil of complexity.

4. To what extent should the current system of allocating funding to strategic interventions across Scotland through lead partners etc be retained or changed by any post-Brexit funding approach and why?

Colleges Partnership observes that the design and implementation of the 2014 to 2020 ESIF programme in Scotland has been a failure. Therefore, a complete rethink is required. The system of Lead Partners and Strategic Interventions (SIs) which is the keystone of the 2014 to 2020 in Scotland was supposed to be designed to mitigate EU audit issues. So the validity of imposing them on the new (non-EU) programme seems perverse. The new ESIF system promised simplicity, reduction of risk and open access to all sectors, In the case of European Social Fund (ESF), none of these benefits were delivered. The introduction of Lead partners and selection of SIs lacked transparency and was a lost opportunity to maintain synergy and partnership across agencies. In many

ways the system has damaged relationships between agencies in the delivery tier. In addition it has increased a silo approach to delivery with weak programme oversight. The latter being characterised by infrequent meetings and a minimalist check and challenge role on detailed delivery issues. From the outside, it has been hard to see any commitment to a collective goal beyond programme spend and process and as official figures show performance in programme spend has been poor.

A key lesson learned, from previous EU programmes, is that the programme regulations and financial rules need to be clearly specified from the outset and their interpretation should be transparent and clear. To avoid this results in wasteful investment in resourcing the project appraisal process. It is evident in the current ESF programme that the majority of problems confronting partner colleges and other providers are caused by a lack of clarity in the financial and programme rules and priorities.

Colleges Partnership finds this particularly galling as previously, Scotland was well-respected by the European Commission (EC) and the EU for its partnership approach to implementing EU programmes. It seems to us that SG's decision to take the management of EU funding "in-house" has been a mistake and has done nothing to improve any aspects of the programme. Colleges Partnership urges SG not to do so with the new (UK) programme and to make efforts to consult all of "team Scotland" and not those who enjoy easiest access to it.

SG and the committee should be concerned that the former's failure to meet N+3 targets has resulted in Scotland losing a significant amount of EU funding, more than €50 million. Officials may try and divert responsibility onto those institutions, like our partner colleges, that have been working hard to deliver the 2014 to 2020 programme. But, as mentioned previously, too much time and energy has had to be devoted to responding to the late and unclear interpretation of programme rules and an abdication of responsibility by the Managing Authority (MA). In addition, the MA has had ample time to make alterations to the programme which would have been accepted by the EC and allowed the creation of new activities. Should the MA maintain this poor level of performance there is a realistic risk that the current programmes will not meet the level of performance required to release the performance reserve, which will mean further loss of funds to Scottish agencies. In addition, if Scotland is seen as a poor performer in the current ESIF programme, the UK Government may see this as reasonable grounds for limiting the Scottish share of the new programme.

In conclusion, the existing programme management arrangements should not be applied to the new programme. A more independent, transparent and accountable management paradigm and structure is required to ensure that the new programme functions well from its inception and is aligned with other sources of national and EU funding and SG policies. This would not preclude SG oversight and involvement in the process.

5. What barriers limit strategic intervention funds being committed to individual projects under the current programmes and to what extent should any new structural funding approach address these barriers?

A catalogue of poor, late and iterative guidance issues and overly bureaucratic audit and verification routines have been major barriers which have limited SI funds being committed to individual projects and activity claimed. SG should resist the temptation of expediency or prompting from officials to ‘mirror’ most of the current monitoring and compliance arrangements. Colleges Partnership would see this as a grave mistake, even if the new programme were to have a limited lifespan of only a few years.

SG failed to respect and protect the legacy of knowledge from previous programmes when it absorbed ESIF management as an “in-house” function. A fresh approach is required to ensure that the mission of the new programme is met, fosters quality and relevance and supports rather than suspects organisations delivering the programme. Currently the MA seems obsessed with financial and participant eligibility and record keeping and has adopted a forensic approach to checking this in the context of late and ever changing rules. This is undermining partner colleges’ confidence in the programme. It is noteworthy that both UK Government and SG hold agencies accountable for far larger sums of money yet are satisfied to apply a lighter touch. The latter is the style of approach which should be sufficient to manage the new programme whilst providing sufficient rigour and transparency in the audit process. The ever-present temptation to gold plate standards should be resisted and a capacity for engagement and dialogue with delivery partners is essential for the management of the new programme plus a huge dose of common sense. To that end, the new programme should publish clear expectations for the audit trails that it will impose and these should be no more burdensome than current public authority provisions. In short maintain rigour but avoid mindless minutiae.

To complement this suggested approach to programme management, it is important to set funding priorities that are aligned with overall strategic priorities but can flex to accommodate demands for new or additional projects. This could be incorporated easily into a competitive approach and is a feature of many funding and grant programmes.

6. To what extent should any rules relating to post-Brexit structural funding enable a flexible approach to the range of local projects that can be supported or should the rules focus on funding specific outcomes or purposes (such as through ring fencing)?

Experience suggests that programmes spanning a number of years or designed to meet the needs of local communities with diverse characteristics require a flexible approach. Colleges Partnership acknowledges that establishing programme rules that foresee the deployment of a range of instruments is an effective means of fostering flexibility. However, it accepts that, in some circumstances, ring-fencing is an effective means of ensuring sufficient finance for more complex aspects of scope or scale or where there is a need to build capacity. Ring fencing can also prevent over delivery on “easier” activity and the resultant consumption of resources needed for more complex activity.

Much current funding is outcome based so colleges are familiar with this approach. Nonetheless, it should be recognised that some activity does not fit that mode of performance measurement. The new programme should consider how it could

incorporate more than one simple approach to measuring project achievement, especially for activities that are low in volume but high in impact.

7. Are there examples of current structural fund priorities being more effectively supported by other funds (or core funding) such that they should not form part of any post-Brexit structural funding approach?

This is an interesting and pertinent question. Of equal merit is to consider how the same or better impacts and outputs for the new programme be achieved more simply by augmenting core budgets and requiring existing public sector bodies to ring fence funding to reach new or additional targets. A “core funding” based model would, in some circumstances, avoid the need for developing new systems.

Colleges Partnership anticipates that a “core funding” model is unlikely to be adopted. Therefore, it is important that funding from the new programme incorporates the priorities which SG would like public sector bodies to support and should, as has been indicated above, be incorporated into the design and implementation of the new programme in Scotland.

Furthermore, the new programme needs to be managed by the devolved administrations. It is worth mentioning that public sector agencies have relied on the addition of EU funding for almost 30 years and so it is unsurprising that many of them can only perceive of the new programme as mitigating the loss of existing funding or sustaining existing provision, even if new and more current priorities are emerging.

8. What changes to the current monitoring, evaluation and compliance activities would reduce administrative complexity for any future structural funds approach while maintaining sufficient transparency?

Partner colleges’ experience of the claims process for ESIF in Scotland, and particularly ESF, has been that a system intended to bring simplicity (EUMIS), actually delivered greater complexity and became a programme driver rather than a tool. Colleges Partnership and its partners believe that the claims process and system have been major contributors to the failure to meet programme targets for N+3. The electronic system has been characterised by work around, retrofitting and claim processes have revolved around mechanistic forensic verification routines Lessons have not been learned from successive previous ESIF programmes on these matters.

Claiming against programme outputs and using unit costing methodologies was and is still an attractive prospect. Under the 2000-2007 programme colleges were the first Scottish organisations to be permitted to use an existing unit costing methodology as the basis for EU funding. However, some hard lessons were learned in the 2014-2020 programme about the time and leadership required to agree such mechanisms with the EC. It is hoped that the UK Shared Prosperity Fund adopts a simple way to use relevant existing unit costs to account for activity, without overlaying these with additional rules and restrictions. It is further hoped that this could be done in a way that does not disadvantage any particular type of applicant or user of the fund. There will be activity

that does not fit such a model, it will be a refreshing change if a common sense approach can be taken to cost and claim such activity without the need for forensic accounting.

It is reasonable to expect that some value for money comparisons may be made between ESF funding and new (existing) methodologies to ensure that the level funding dedicated to delivery is not unintentionally eroded by use of existing payment systems.

In addition, the new programme should grasp the opportunity to embrace and learn from the range of simplifications in the current ESIF programme which the EU has created but have not been adopted by the MA in Scotland.

9. Should the system for making claims change for any future funding approach?

Colleges Partnership welcomes this opportunity to input to the work of the Committee. The Partnership and its six partner colleges hope the new programme is a worthy and credible successor to EU structural funds and delivers meaningful impact. This submission, also, reflects the level of frustration endured by partner colleges over the last four years in delivering ESF. Our plea is that the management of the new programme focuses on the delivery of priorities and does not displace energy on administrative procedures and record keeping. To that end, Colleges Partnership demands that:

- the new programme and any associated programmes are cheaper and less demanding of partner resources in its management and administration;
- the managing organisation and any intermediaries should not be allowed to 'gold plate' any rules or requirements and is charged with producing a single set of rules and procedures for application and claims produced in advance of programme start date;
- the new programme should not simply replicate what has been done thus far and it should articulate well with EU transnational programmes and existing UK programmes;
- investment is made in building on existing capacity in colleges and other organisations to help them understand and deliver the new programme;
- the rules regarding eligibility are sensible, simple and as few as is absolutely necessary;
- the rules regarding finance claims are proportionate and sensible;
- there is no place for iterative and late guidance in managing the new programme.

Annexe

EU Funding Programme	Scotland Arrangements 2021-27
<p data-bbox="81 1783 815 1823">European Structural & Investment Funds (ESIF)</p> <p data-bbox="81 1861 855 1966">The purpose of these funds is to invest in job creation and a sustainable and healthy economy and environment.</p> <p data-bbox="81 2004 443 2045">UK contribution: €37.8bn.</p>	<p data-bbox="879 1783 1501 1823">Replacement Programme – value €3.2bn</p> <p data-bbox="879 1895 1533 2045">Should include proportionate share of these 4 Programmes as the new EU Programmes 2021-27 merge these programmes into EU Structural Funds.</p>

<p>COSME Programme</p> <p>This programme supports the competitiveness of small and medium-sized enterprises. For the 2021-27 programme period, this activity will be absorbed into the new ESIF programmes at EU level.</p> <p>UK contribution: €0.275bn.</p>	
<p>EU Health Programme</p> <p>This programme supports co-operation among EU countries in the field of health. For the 2021-27 programme period, this activity will be absorbed into the new ESIF programmes at EU level.</p> <p>UK contribution: €0.053bn.</p>	
<p>EaSI Programme</p> <p>The employment and social innovation programme promotes high level quality and sustainable employment, adequate social protections, combats social exclusion and poverty and improved working conditions. For the 2021-27 programme period, this activity will be absorbed into the new ESIF programmes at EU level.</p> <p>UK contribution: €0.919bn.</p>	
<p>Connecting Europe Facility</p> <p>This programme supports targeted infrastructure investment in the fields of transport, energy and digital services.</p> <p>UK contribution: €2.6bn.</p>	<p>value €221m</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p>

<p>Common Agricultural Policy</p> <p>Pillar 1 ensures standard of living for farmers & provides consumers with a stable, affordable food supply.</p> <p>Pillar 2 improves competitiveness for farming and forestry, protects environment & countryside, improves quality of life and diversification of rural economy.</p> <p>UK contribution: €48.9bn.</p>	<p>Value to Scotland €36.5bn.</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p>
<p>Horizon 2020 Programme</p> <p>EU's flagship programme for Excellence in Research and Innovation.</p> <p>UK contribution: €9.4bn</p>	<p>Scotland's position is to participate in the replacement Horizon Europe programme as a 3rd Country.</p> <p>Scotland's share of the UK contribution is €796.2m.</p> <p>Funds should be fully devolved to Scotland, allowing continued international engagement for Research and Innovation via 3rd Country arrangement with EU or through bilateral agreements.</p> <p>Requirement to ensure that priority ambitions for this programme must be considered as part of an overall strategy – therefore there is a need for devolved oversight.</p>
<p>Erasmus + Programme</p> <p>EU programme for education, training, youth and sport.</p> <p>UK contribution: €1.7bn.</p>	<p>Scotland's position is to participate in the replacement Erasmus Europe programme as a 3rd Country.</p> <p>Scotland's share of the UK contribution is €148.9m.</p> <p>Funds should be fully devolved to Scotland, allowing continued international engagement for Education, Training, Youth and Sport via 3rd Country arrangement with EU or through bilateral agreements.</p> <p>Requirement to ensure that priority ambitions for this programme must be considered as part of an overall strategy – therefore there is a need for devolved oversight.</p>

<p>Interreg Programmes</p> <p>EU programmes supporting cooperation across borders. It aims to tackle common challenges and find shared solutions in fields such as health, environment, research, education, transport and sustainable energy.</p> <p>UK contribution: €1.2bn.</p>	<p>Scotland's share of the UK contribution is €103.1m.</p> <p>Funds should be fully devolved to Scotland, allowing transnational co-operation by means of 3rd Country participation in the new Digital Europe Programme; 3rd Country participation in the 2021-27 Interreg Programmes or through bilateral agreements.</p> <p>Requirement to ensure that priority ambitions for this programme must be considered as part of an overall strategy – therefore there is a need for devolved oversight.</p>
<p>Creative Europe Programme</p> <p>EU programme supporting European cinema and cultural and creative sector.</p> <p>UK contribution: €175.53m</p>	<p>value €14.74m</p> <p>Funding directed to support cultural and creative sector in Scotland and also to align with creation of new Scottish Film studio.</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p> <p>Requirement to ensure that priority ambitions for this programme must be considered as part of an overall strategy – therefore there is a need for devolved oversight.</p>
<p>Life Programme</p> <p>EU programme to improve the implementation of EU environment and climate policy and legislation.</p> <p>UK contribution: €414.8m</p>	<p>Scotland's share of the UK contribution is €34.84m.</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p> <p>Requirement to ensure that priority ambitions for this programme must be considered as part of an overall strategy – therefore there is a need for devolved oversight.</p>

<p>Europe for Citizens Programme</p> <p>EU programme to support activities to increase awareness and citizens' understanding of the EU and of its values and history. The programme also helps people become more engaged in civic and democratic activities.</p> <p>UK contribution: €22.3m</p>	<p>Scotland's share of the UK contribution is €1.87m</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p> <p>Requirement to ensure that priority ambitions for this programme must be considered as part of an overall strategy – therefore there is a need for devolved oversight.</p>
<p>EU Rights, Equality and Citizenship programme</p> <p>EU programme to help make people's rights and freedoms effective in practice by making them better known and more consistently applied across the EU</p> <p>UK contribution: €52.74m</p>	<p>Scotland's share of the UK contribution is €4.43m.</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p> <p>Requirement to ensure that priority ambitions for this programme must be considered as part of an overall strategy – therefore there is a need for devolved oversight.</p>
<p>EU Asylum and Migration Fund</p> <p>EU programme focused on people flows and the integrated management of migration.</p> <p>UK contribution: €3.17bn</p>	<p>Scotland's share of the UK contribution is €31.63m.</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p> <p>Requirement to ensure that priority ambitions for this programme must be considered as part of an overall strategy – therefore there is a need for devolved oversight.</p>
<p>Food and Feed programme</p> <p>EU programme aimed to strengthen enforcement of health and safety standards for the whole agri-food chain.</p> <p>UK contribution: €227.3m</p>	<p>Scotland's share of the UK contribution is €19.07m</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p>
<p>EU Justice Programme</p> <p>EU programme to ensure effective application of EU legislation in civil and criminal justice.</p> <p>UK contribution: €45.31m</p>	<p>Scotland's share of the UK contribution is €3.81m.</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p>

<p>EU Internal Security Programme</p> <p>EU programme to support the implementation of the Internal Security Strategy and the EU approach to law enforcement cooperation, including the management of the union's external borders.</p> <p>UK contribution: €451.71m</p>	<p>Scotland's share of the UK contribution is €37.94m.</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p>
<p>EU Customs and Taxation Programme</p> <p>EU programme to support functioning and modernisation of the Customs Union.</p> <p>UK contribution: €108.9m</p>	<p>Scotland's share of the UK contribution is €9.15m.</p> <p>Scotland should be entitled to a proportionate share of the funding returned to the UK for this programme.</p>
<p>Instrument for Pre-Accession</p> <p>EU programme to support countries who are preparing for EU accession</p> <p>UK contribution: €1.4bn.</p>	<p>Scotland's share of the UK contribution is €117.9m.</p> <p>Funding directed to support the transition from EU compliant systems to 3rd country compliance.</p>
<p>Scotland Total</p>	<p>€41.5bn</p>