

**NATIONAL CULTURAL STRATEGY: DRAFT GUIDANCE FOR SCOTTISH LOCAL AUTHORITIES; WRITTEN CONSULTATION RESPONSES**

FROM	GUIDANCE ON CULTURAL MATTERS/STYLE	DEFINITION OF CULTURE	OMISSIONS	LOCAL ROLES, STRUCTURES & STRATEGIES	PARTNERSHIPS	GOOD PRACTICE	OTHER
1. HIE	Welcomes				Important	Examples suggested	
2. Multi Ethnic Aberdeen Ltd	Very impressed		But will it bite?		Hope LAs will take this on board	No example of ME arts	MeAL should have been consulted/add to lists
3. Highland Council	Welcomes & agrees: practical bits are best	Cross-cutting important		Unhelpful to review structures again post-McIntosh Council-wide cultural strategy linking to CP is helpful advice	Should say more about volunteering & needs of volunteers	Offers examples: Feisan movement; Cultural Pledge	
4. Renfrewshire Council	Helpful/wide Digest needed	OK	Make purpose explicit: to drive change Include pointers for future funding & how to secure £ Needs a “how good” document for self-assessment Should say more about content of local strategies Add “writing development” after 6.7.14 Add barriers to accessibility/needs of disabled/incl. young people	Section on roles is slight Integrate to show roles within management models		Gives good example of writer in residence scheme Other examples offered	2 references to be added
5. Angus Council	Welcomes Of great value		Guidance shows little knowledge of cross-cutting in LAs e.g. Best Value section ignores much that is in place Suggests some detailed inserts/changes	Will prepare own strategy/plans Good to see LA role acknowledged		Suggests/offers examples of good practice	A full audit of cultural activity in LA is required

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6. Unison Scotland	Welcomes Important document	Good/comprehensive – but no ref to broadcasting	Obligations/ benchmarks/ national standards needed to add weight No way ahead offered re funding shortages Add ref. To PPP Protocol Wants references to broadcasting Suggests detailed tweaks/additions	LA leadership role is acknowledged Mgmt section is slight – need more on pros/cons of alternatives DCMS advice on prep. Strategies suggests standards	Sometimes key partners/stakeholders (users/ citizens/ staff) are omitted But good to see this emphasised – and links to CP	Suggests 7:84's work with GCC	Continuing dependence on PPP will cause inflex. & expense, not helping community projects Dialogue/process needs to continue, to test impact of guidance Wants SE/another to do surveys of provision
7. City of Edinburgh Council (prov)	Warmly welcomes		Need examples of partnerships Need local outcome agreements linked to key cross-cutting areas Suggests additions	Explain more clearly funding/ grant-giving role Local strategies should be <b>strongly</b> recommended & policies on CP lines	Good on joined-up activity	Suggests examples – incl. of partnerships	SE should undertake national review of cultural provision – for clearer guidance on provision, maintenance etc Say: no cultural strategy = no lottery etc £!
8. Inverclyde Council	Welcomes Very valuable			IC works in partnership re. an Arts Strategy	IC does this	Suggests its partnership approach	
9. Dundee City Council	Broadly welcomes Needs a more accessible summary – not easy to read	Broad, but ensures something for everyone	Parks etc and S&T deserve more emphasis Needs further input on how & by whom funding is allocated	Guidance will help delivery LA lead role is acknowledged A single LA strategy binding relevant plans works for DCD Mgmt focus, through a single Director, does too	Crucially important – sees case for regional consortia of LAs (helps liaison with national bodies)		How can guidance drive change? Also needs guidance to assist local evaluation SE should now do formal review of cultural provision/ issue circular (consider organisational/funding issues too)

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10. Dumfries & Galloway Council	Welcomes	Acknowledges broad definition		Planning an overarching, cross-cutting strategy for their plans		Suggest some fine partnership examples for final guidance	Would welcome additional financial support or incentives for cultural work
11. Perth & Kinross Council (prov)	Welcomes/has to be advisory only Long/not easy to navigate	If all know what the definition is can plan accordingly	Notes it doesn't define "adequacy" – need minimum standards as are in place for library provision. Or else LAs must define levels for their citizens Should recognise that traditional compartments will influence provision till ideal achieved <i>Re: source's</i> documents to go into references	Pleased at acknowledgement of LAs' key role Too much text on LAs' role (20pp) Welcomes advice on structures & individuals' roles	This is vital CP will be critical P&KC will review its CP in this regard	P&KC's culture managers occupy senior positions Their cultural campus cited as example	Council places emphasis on importance of nation's cultural life Review content regularly National Audit looks helpfully at capacity building – more widely applicable in sector/alluded to in guidance
12. National Archives of Scotland	Welcomes Pleased records are included & recognised as key		Need examples of good practice re records Suggests caveat to 6.8 Suggests addition for 4.3		Partnerships increasingly important for records' projects	Suggests example/source of others	Good scope for local archive service provision to improve
13. Institute of Leisure and Amenity Management	Broadly welcomes guidance from SE Format not easy to read – need summary/change format to toolkit		Mention Parks etc in their own right Suggests tweak to Table A, & new reference to Play Define "adequate provision"	A fair account of roles but say more about elected members' leadership/advocacy role			Will LAs develop strategies when guidance is just advisory? And will engagement with CP have its impact? Pleased to be consulted – represents >400 sector members

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14. East Renfrewshire Council	Supports strongly Comprehensive Needs concise executive summary of main issues	Supports definition – shows difference between arts & culture	Could make more of point that culture is not elitist Suggests tweak to emphasise provision for the disabled	Will guidance be accessible and/or heeded?	Encourage agencies & vol. Sector to enter into partnership with LAs Encourage partnerships between LAs – promote joint planning etc	Also demonstrate by example what local strategies can achieve	Could make more of parks, sports and libraries – but overall, balance is OK Resource issues – make culture eligible for QoL £/have local output agreements Guidance will just be the start of the process
15. East Ayrshire Council	Welcomes/helpful Status of guidance? Not easy to read – need executive summary/change to toolkit format	Satisfactory	Needs more on exploration of resources Define “adequate provision” Address Parks & Open Spaces (play) etc in their own right, & suggests insert to Table A Suggests new references	Useful, but say more about members’ leadership & advocacy roles	Could say more about arts development partnerships	Needs examples for all aspects – and more robust/ better ones Suggests several examples	
16. East Lothian Council (prov)	Welcomes Valuable advice, & will help produce strategy	All embracing But perhaps add: drama [theatre is mentioned], storytelling & puppetry Define “range of crafts”		Recognises LAs’ provider role Highlight staff development and training for implementation of strategies	Vital aspect for ELC	Wants more examples – e.g. on cultural diversity & equality Could supply more examples	

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17. Royal Town Planning Institute	Supportive (esp. piece on staff resources/training)		Section on Trusts is restricted Needs to better recognise value of vol. sector Funding (p37) light on partnerships for capital projects Tweak para. 4.6.4 & 6.3.8 Include heritage-led regeneration New references & detailed changes sought incl. to safeguard conservation areas	Restructuring to reflect functionality can harm prof. groupings – integrate through matrix mgmt instead Table C needs a conclusion	CP guidance is vital, but omits city-region links. So needs section on inter-authority co-operation & wider strategies		
18. Assoc. of Regional & Island Archaeologists	Useful & commended (but tweaks suggested)	Mention evolving physical environment	Needs clear statement of all-embracing value of culture Scottish rural landscape under-emphasised Some detailed drafting points suggested		SE needs to be proactive in promoting joined up service provision	Guidance is arts/leisure dominated – few examples (e.g. in 6.3) of built heritage/historic environment	(ARIA members are located in land use planning depts) SE should promote a detailed model of potential service delivery

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19. Scottish Out of School Care Network	Endorses the key advisory points (esp. 9 & 10)		Suggests clarification of OSC & OSHL services Stress need to plan jointly to avoid duplication/displacement and maximise opportunities				
20. Fife Council	Welcomes Extremely helpful, but would benefit from stressing a more radical approach to future development More spacing, sans serif etc to aid readability	Strength is its broad and inclusive Weaknesses: does not assist prioritisation; sport & recreation appear like add-ons; public awareness is of culture as highbrow (think about language and balance)	Suggests more input on subjects such as Open Spaces, Outdoor/ community-based learning etc (given key activity status) Mention value for art 'for its own sake' Need to recognise fully the contributions of natural/ historic landscapes & countryside aspects Detailed drafting points suggested & new references	Welcomes that SE recognises culture's impact upon core activities	Is SE issuing guidance to agencies/other sectors re CP etc? Refer to small-scale partnerships at community-level	Examples need fuller explanation/case studies (on a supporting website) Specific examples are suggested Give monitoring/evaluation models to show impacts More examples needed – young people 'engaged' through culture	Needs to be reflected in other relevant guidance & the production of same Wants closer linkage with sport/physical activity policy strategies SE should produce implementation action plan, in context of Best Value & CP Consider hypothecation

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21. Scots Language Resource Centre			Scots language issues are not addressed inadequately; and the matter of language development is limited Reference to Scots in “Learning” section will not help promote it	Local strategies should deal in more than events – e.g. relate culture to social etc developments			A coherent national policy should be produced, and guidelines to enable LAs to develop Scots language policy LAs should support Scots as a ‘community language’: e.g. research & statistics are needed
22. Scottish Natural Heritage	Welcomes moves to make more of the natural heritage theme (than the NCS does)		Say more about involvement of people in activities with cultural roots (offers detailed suggestions for sections 3 & 6, and examples)			Gives 2 examples	
23. New Opportunities Fund (Scotland)			NOF would be pleased to receive a direct mention as an additional partner and funding source Rural development is another cross-cutting theme		Much of NOF’s work focuses on delivery through partnerships, often through LAs and CP partners	NOF gives examples of how its funds have contributed to the major cultural activities	
24. Aberdeenshire Council	Welcomes guidance A shorter document stating action required of Councils would help		Advice on actions LAs should take should be clearly stated No clear advice on core activities or priorities (unlike National Priorities for Education) Part 6 subheadings do not correspond to Table A Say more about evaluating quality	Welcomes acknowledgement of role of Councils More is needed on developing local strategies: e.g. how to assess demand, resources & priorities for each Council area (not all the same)			Pleased CoSLA was involved – would like to see a final publication issued jointly

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25. Aberdeen City Council	Welcomes this extremely useful checklist	Pleased this aligns to NCS definition	Improvements to document should flow from lessons learned in implementation; guidance should be used as a template for assessing performance	Guidance fully recognises the LAs' actual and potential roles		Would like to supply examples from Aberdeen	Important that national agencies have regard to the document in their work with LAs
26. Stirling Council (prov)	Welcomes, as a useful reference tool Lengthy and, in parts, inaccessible – needs concise summary for Councillors etc		More benefit is to be had by focusing on key cultural activities (rather than diluting), and developing close working with key agencies Supports VOCAL's call for defining minimum levels of entitlement for people & communities (would relate to Section 5) Suggests 2 more references, and a couple of detailed points to add	Fully acknowledges LAs' leadership role and cross-cutting contribution of culture	Recognises importance of partnership working, but such a wide interpretation (instrumental inputs) can dilute the impact	Examples are very useful – develop these as a separate document	
27. Voluntary Arts Scotland	Welcomes its comprehensiveness Prefers 2 document approach: a strategic advocacy paper and a detailed paper		Should say what Councils should aim to achieve More examples would be good Should encourage LAs to take stock of what's available locally and to build/work with that Suggests detailed drafting points		Can national companies' visits to local areas be tied in with activities by local bodies on the ground? SAC's cluster meetings are good in spreading the word to LAs who have not been so active	Suggests example of Adult Learning Project in Edinburgh	Welcomes recognition of voluntary sector role - LAs' support for vol. arts activities should be a best Value indicator Need to support LAs continues notwithstanding the guidance

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28. Aberdeen University Students' Assoc.		Welcomes SE's broad definition & recognition of links to wider aims			LAs should view Universities as stakeholders in drawing up local strategies, and as ongoing partners, for cultural initiatives and for access	Provides examples in its commentary	Refers to Universities' extra-curricular cultural pursuits (societies etc) and contribution to local activity
29. The Voice of Chief Officers of Cultural, Community and Leisure Services in Scotland (VOCAL)	Broadly welcomes Comprehensive with useful reference material Not easy to read – needs executive summary of key issues, for use of Councillors, CEOs etc	Welcomes and supports	Limited in terms of actual /specific guidance Community Education circular identifies core areas & encourages specific actions – culture deserves the same rigour Suggests change to Tables A & B, & Part 6, to focus core expectations Parks/Open spaces are a core activity & need treated consistently	Endorses LAs' major leadership role Should also be advice on producing strategies, tailored to each area, and addressing evaluation/quality	Partnerships are crucial to cultural provision Partnership & Best Value sections require guidance on applying CP		In view of advisory status something more is needed to drive provision and ensure culture plays its part across relevant policy areas Also need guidance to assist delivery and evaluation Guidance should prompt SE to do formal review of cultural provision, in partnership, leading to a policy circular

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30. Heads of Instrumental Teaching Scotland	Welcomes national benchmark as reference point for service planning & budgeting Very comprehensive & will be useful to HITS	Welcomes	Suggests specific points	Guidance makes cogent argument for the importance of culture & the LAs' role to ensure appropriate provision	Partnership is the key		Encouraged to see Instrumental Music Tuition considered as learning activity
31. West Lothian Council	Welcomes national benchmark as reference point for service planning & budgeting Will be an invaluable tool Length somewhat unwieldy; needs executive summary of key points beside it	Breadth allows inclusive interpretation that will help in developing their local strategy	Parks & Open spaces should be shown as a key activity Suggests detailed points & reference Some listed aspects of provision overlap with CP themes, whereas a cultural strategy should add true cultural aspects to CP elements	Guidance makes cogent argument for the importance of culture & the LAs' major role to ensure appropriate provision Section on roles is very helpful in clarifying expectations	Partnership is the key Section 4 should reflect partnerships already in place for CP	Examples are helpful, even if they do add to volume Need examples of e.g. partnerships now in place, audience development, arts development work, and the Council's instrumental music service	Encouraged to see Instrumental Music Tuition considered as learning activity
32. Falkirk Council	Helpful Long & quite wordy Would welcome a summary with the final version	Agrees with broad definition as proposed	Suggests some new references	Welcomes recognition of LAs' contribution & cross-cutting impacts Gives a fair reflection of respective roles	Gives appropriate emphasis to partnership – particularly relevant to CP	Suggests an example relating to adult literacy & numeracy	Right to have guidance advisory only

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33. Ayrshire Libraries Forum	Very pleased and impressed by the guidance		Asks for 2 additions			Additions include an example	
34. Scottish Museums Council				Respective roles of the SE & each relevant agency, including SMC & NMS, need clarity National strategies required for cross-sectoral interests (e.g. museums & tourism) bringing bodies together to devise/action			Same response applies to Museums Sector Action Plan (policy points) Need to ensure final version is as congruent as possible with the emerging Action Plan for Museums/Galleries sector SE should consider ring-fencing GAE
35. South Lanarkshire Council	Useful, & good that it's not prescriptive Comprehensive		Could mention the value of cultural research Give more emphasis to links between health & the environment to develop outdoor activities Stress that diversity is welcomed & lists provided are not exhaustive	Guidance will help in implementing local strategy	Vital to delivery – esp. links between education & community services		Emphasis on community services is correct; maybe education deserves more Right to stress that each LA should review its arrangements Should acknowledge that Lottery processes are arduous/try to improve them

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36. Council for Scottish Archaeology	Welcomes As it's comprehensive in many ways, need to attend to gaps – archaeology/ historic environment in LA activity	Welcomes broad definition of culture	Like NCS, guidelines fail to identify importance of historic environment Gives drafting suggestions, reference & examples		Important, as is outreach	Provides good practice examples At present too many are arts based	Implementation should include the archaeological heritage Needs to balance present arts bias
37. Scottish Arts Council	Useful in setting current context Comprehensive Suggest elected members would welcome a shorter version, but with more details than present executive summary		Advisory, but should specify clear outcomes Feels strongly that the intrinsic value of the arts should have greater emphasis earlier in the guidance Needs more on cultural diversity Drafting point			Encourage LAs to look at the examples of Leicester, Bradford etc developing cultural diversity; and similarly, at work by more rural authorities in England	How will it address low priority in some LAs and pattern of falling investment Hope tone of final document will encourage imaginative cultural planning
38. Argyll & Bute Council	Broadly welcomes – useful guidance for policies, strategies & CP		Would welcome guidance to achieve consistent approach to strategies across Scotland that impact on cultural agencies	Organisation and management advice is welcomed	Culture has vital role in CP Cultural agencies seem distant from rural realities – they seem to focus on “long-standing” LA partners		SE should encourage a national audit of cultural activities & funding, mapped in consistent format, for comparison More resources are required

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39. West Dunbartonshire Council	Welcomes – supportive & holistic approach Presentation could be more user-friendly Need shorter version too, with main points, goals & objectives		Would welcome guidance on how arts activities with ‘soft’ outcomes can satisfy Best Value & review requirements needed to underpin funding Document needs to be more prescriptive – defining “adequate” & might propose a GAE allocation for culture More references wanted	SE might wish to continue the guidance into a rolling programme supporting development of strategies by all LAs	There is good scope for partnerships within, and between, authorities e.g. consortia Focus on partnership, and particularly CP, is valuable	Gives examples of creating access & of partnership activity Contact details would be of benefit	Guidance could be taken forward by annual plans, evolving into self-assessment toolkit & benchmarking, & also PIs Would like to see more evidence of partnership & joint planning between the national agencies Template to capture activity spend across authorities would aid consistency
40. North Lanarkshire Council	Very helpful But not easy to read: needs executive summary with key points put simply	Welcomes broad definition	In a final version of Table A, Parks & Open Spaces should be a key activity Needs guidance on evaluation too	Recognises major leadership role of LAs Should note the disparity of functional arrangements within LAs	Endorses partnership working – but need to clarify the SE’s role		Would welcome a review of cultural activity provided across Scotland – at present it’s inconsistent Offers to contribute to the review
41. VisitScotland			Refer to SE’s Tourism Framework Other detailed points relating to tourism interest		VS would encourage LAs to work across boundaries, & with agencies including ATBs		To add weight, final version will hopefully be a joint publication with CoSLA

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42. Scottish Borders Council	Welcomes recognition that all 9 activity areas involved & cross-cutting impact Notes the importance of quality & the value of investing in culture Very useful advice on libraries		Needs more emphasis on value of the Scottish countryside Wants more on the natural environment in Table B Other detailed points		Welcomes value attributed to partnership Can be complex to implement CP has scope to demonstrate impact of culture		Should the vague (“adequate” etc.) legislation be reviewed? Thinks advisory status will not lead to more (needed) investment Benchmarking needed across all LAs, with PIs Looks forward to review of libraries legislation (archives also?)
43. Scottish Liberal Democrats		Agreed		Strategies should relate to NCS & embrace broad definition of culture – also social & geographic inclusion	Supports proposals for community involvement in developing cultural provision - NCS implementation should not be controlled centrally		Evaluation matters, but measures of success are not a simple matter Provision should be consistent with Best Value Would welcome a simple set of PIs to assess progress
44. South Lanarkshire Council	Congratulations to the authors on a detailed job Guidance is helpful Needs document of c. 6 pages summarising key points	Fine. NCS definition is product of consultation and now recognised	Suggests new references Section 6 reads as if written in isolation without reference to other disciplines/sectors: inject cross-cutting feel	Discussion of roles is helpful – but ranking of culture matters more than structure Gives a good baseline picture of the role of Councils & relevant activities/resources	Section helpful – especially regarding CP & capacity building	Needs examples concerning archives and museums	Accountabilities need to work in cross-cutting ways, not hierarchically Ring-fencing of funds could raise culture’s priority on wider LA agenda

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45. Comhairle nan Eilean Siar	Guidance is helpful and commendable	Satisfactory – all embracing –though could say more about the shaping influence of religious beliefs	Suggests examples & also some detailed points to reflect that island culture is unique Guidance should give Gaelic more prominence, & recognise it has relevance to the whole country	Good description of LAs’ leading role for provision – could say more about LAs’ work in partnership with communities Does not say what are the optimum structures	Well covered at the agency level, but should encourage partnership between agencies and communities (e.g. volunteers) to assist sector	Suggests some more (e.g. H&I’s Local Historical Societies)	Guidance has encouraged the LA to think more broadly about culture within a strategic framework
46. <b>RESTRICTED</b>			Guidance in this area should stress multi-cultural needs: present NCS does not address these effectively	Local strategies are needed, integrated into the mainstream planning process			Expresses concern that multi-cultural festivals not being promoted for maximum effectiveness; and concerned generally about problems of exclusion
47. YouthLink Scotland	Welcomes Useful, practical guidance	Welcomes definition – takes a broad view of cultural life in Scotland	Guidance fails to highlight the contribution of young people Wants relevant examples added and makes specific drafting points	Recognises role of authorities, members & officers; and recognises the range of activities & resources Local policies and plans should reflect the important contribution of young people and youth work	Welcomes recognition that young people are stakeholders – would welcome more detail on their role Young people can contribute significantly to community planning	Wants, & suggests, examples of projects which impact positively on young people	Will Executive issue guidance to other agencies with a role to play under the National Cultural Strategy?

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48. Convention of Scottish Local Authorities	Concise summary is required, that will impact on policy makers	Better to focus on key priorities than to dilute impact	Strengthen sections on community planning, provision for people with disability, and rural access Recognise that “one size does not fit all” Increase emphasis on cross-cutting relating to Best Value Needs better links with national sports policy and National Agenda for Play Stress that culture is not elitist Refer to inclusion of young people - & refer to parks, open spaces etc	Reconsider inclusion of reference to management structures Clarify role of authorities as funding bodies	Partnership working at national-level is fragmented Need to consider relationship between local authorities’ cultural activity and work of the tourism bodies		CoSLA’s Culture and Leisure Executive Group agrees that the final guidance should be issued jointly by the Executive & CoSLA (subject to sight) How is demand assessed? Consider benchmarking, good practice sharing, monitoring/evaluation etc. There should be an annual cultural plan measuring impact of cultural activity