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European Structural
and Investment Funds

Community Led Local Development Team

CLLD Cross Cutting Themes

General Information for Applicants

Introduction

These guidance notes have been written to assist applicants who are applying for funding under the Community Led Local Development Fund (CLLD). They have been designed to help you understand how to appropriately consider and embed the Cross Cutting Themes (CCTs) in your applications.

There are two funding streams that have been brought together under CLLD. These are the European Regional Development Fund (ERDF) and the European Social Fund (ESF). These guidance notes aim to support applicants with the Cross Cutting Themes requirements of ERDF and ESF applications (both at expression of interest (EOI) and full application (FA) stages) within the CLLD programme.

The contents of these guidance notes are not exhaustive and applicants should familiarise themselves with the relevant guidance notes for the programme, together with the relevant Call under which the application is being submitted (if appropriate).

Cross Cutting Themes

The Cross Cutting Themes form integral and extremely important components in administering European funds. The Cross Cutting Themes are defined as:

- Sustainable Development
- Equal Opportunities and Non-discrimination.

These themes must be embedded from the initial design and development phase of a project, through to project delivery and beyond.

At the expression of interest (EOI) stage, the Cross Cutting Themes form part of the initial 'core assessment criteria'. It is therefore very important that you consider how you will explain what you are doing to address the Cross Cutting Themes requirements when you fill out the relevant section of the EOI form. You will be expected to provide more detailed information at the full application stage.

In making their decisions/recommendations on project applications, the Local Action Group (LAG) Boards will prioritise projects that clearly demonstrate how the Cross Cutting Themes are embedded in their projects.

For additional information, refer to the Inclusion Strategy and the Environmental Growth Strategy outlined in the [Cornwall & the Isles of Scilly \(CioS\) ITI Strategy](#). (pages 64 & 65)





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Applicants are encouraged to refer to the handbook for their area and the application guidance to ensure that their project meets the necessary requirements in terms of Cross Cutting Themes.

Sustainable Development Theme

Sustainable development is an overarching objective of the European Union (EU). It is also a cross cutting priority theme within the ERDF and ESF 2014-2020 Programmes and therefore a priority for CLLD.

Applicants will need to consider how they will achieve an appropriate balance between the needs of the environment, social and economic objectives in project design, management and delivery.

Environmental sustainability must be an integral part of all CLLD funded projects, and applicants need to ensure that their project activities do not have an adverse effect on the environment. For larger projects, applicants must be able to demonstrate that they have given due consideration to the likely impacts of their project, demonstrating how they will maximise positive environmental impacts and, where appropriate, showing how they will remove/mitigate any potential negative impacts.

The principles of sustainable development should be embedded into the project and have informed its development and delivery. Applicants should set out both what they do as an organisation and how they will deliver sustainability to the end beneficiaries – it's often the latter that can have the biggest impact.

Legislation

For some types of projects which are likely to have a significant impact on the environment, an independent assessment is mandatory. Applicants therefore need to provide as much detail as possible on the likely environmental impacts of their project. The amount of information required will vary depending on the size of the project and the activity being undertaken. In preparing a project application, applicants may need to seek advice from an environmental expert to ensure it complies with environmental legislation.

Please also consider the Polluter Pays Principle (whereby the party responsible for producing pollution should pay for the damage to the natural environment). The relevance of this can vary from project to project, but it is worth noting that greenhouse gases are considered pollution. Applications should therefore demonstrate (where relevant) that the Polluter Pays Principle is adequately considered in their proposal and detailed in their sustainable development policy and implementation plan.

<http://www.lse.ac.uk/GranthamInstitute/faqs/what-is-the-polluter-pays-principle/>

In setting out how the project meets the requirements of the Sustainable Development Theme, applicants should consider the following in their application. This list is not exhaustive:





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- Adequately consider sustainable development principles (environmental, social and economic);
- Where appropriate, provide evidence of how the business complies with all relevant UK and EU legislation;
- It is a requirement of ERDF and ESF to provide a project specific Sustainable Development Policy and Implementation Plan at full application stage. At EOI stage (Section 9 on the Expression of Interest Form) details of what the policy and plan include will demonstrate how the project anticipates delivering against the Sustainable Development Theme. The Sustainable Development Policy and Implementation Plan should be working documents that are reviewed and updated regularly and should include details of how the Policy will be communicated to project staff and partners;
- Provide details if the project has a specific environmental focus;
- Provide details if the project compliments any of the environmental thematic objectives of this Programme;
- Demonstrate how the project is integrating adaptation and local resilience to climate change (particularly where these strengthen local economic development by managing risk, avoiding disinvestment and safeguarding growth);
- Demonstrate (where relevant) consideration of the EU's commitment to halting biodiversity loss and degradation of ecosystem services – not just do less harm;
- Show how the project supports the move towards a low carbon economy (for example by adhering to UK Government buying standards and through using nationally recognised building and civil engineering sustainability standards (as detailed below in the capital projects section);
- Provide details if the project will use the environment as a resource to help motivate disadvantaged people (for example by providing non-classroom/non-traditional learning environment);
- Detail if/how the project supports recycling;
- Evidence where good and best practices are achievable over and above the minimum legal requirements;
- Provide mandatory environmental training for all project staff;
- Support a culture of resource and energy efficiency including sustainable procurement;
- All sub-contractors must be listed in the policy and must demonstrate how they will support sustainable development;
- The Sustainable Development Policy statement should confirm that the applicant will check that each organisation involved in delivery of the contract (the provider and any sub-contractors) will a) dispose of its waste using a registered waste collector and b) observe and comply with the Waste Electrical and Electronic Equipment (WEEE) regulations;
- The Implementation Plan should include a commitment to researching and producing a simple baseline estimate of its own environmental impact in terms of: waste minimisation; recycling; and energy consumption. The Plan should also explain how this will be assessed for any other organisations helping to deliver the contract and how this will be monitored;
- Monitor and report against the project's Cross Cutting Themes.





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Area Facilitators will be able to signpost applicants to the relevant advice and expertise including where to find examples of policies and implementation plans. There are also useful website links at the end of this document.

Revenue projects

For revenue projects the Cross Cutting Themes should be applied relative to the scale and scope of the project, focussing on what are the greatest benefits. Examples of good practice include having an externally verified Environmental Management System such as ISO14001, Eco-management and Audit System or the IEMA Acorn Scheme (BS8555).

The ESF programme welcomes complementary training support for specialist sustainable development activities delivered by other programmes such as ERDF.

Capital projects

Proposals for buildings and infrastructure will be subjected to environmental safeguards in the planning system and must also be assessed using recognised standards, such as the Building Research Establishment Environmental Assessment Method (BREEAM) for buildings. This is to ensure that environmental sustainability is considered throughout the whole lifespan of a project.

Capital investments will normally be expected to achieve the following:

New build projects - BREEAM Excellent is the default requirement with scope to agree Very Good where circumstances make this the highest feasible standard;

Refurbishment Projects - BREEAM Very Good;

To achieve these standards, applicants must show what they are doing to proactively maximise energy efficiency and minimise water consumption and drainage off site where appropriate. For example (this list is not exhaustive):

Positive environmental impacts could include:

- improvements in energy efficiency;
- reduction of carbon emissions;
- using renewable energy;
- incorporating water efficiency measures;
- enhancing natural habitats;
- reducing waste generation;
- using recycled materials.

Negative environmental impacts could include:

- impacts on wildlife habitats – these might be short-term impacts (for example, whilst the project is being constructed), or longer-term impacts from the ongoing presence and use of a facility;
- significant increases in traffic and/or congestion;
- pollution (including noise and dust);
- waste generation (during construction and in use);





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- increased flood risk;
- visual impact.

For BREEAM, an initial design stage assessment (ideally at RIBA stage 3), providing an overview of what the building could realistically achieve, should ideally be provided with the full application.

Gender Equality & Equal Opportunities

All European Structural and Investment Funds promote equality in accordance with the EU and national requirements. Applicants therefore need to be able to explain how their project contributes to, and meets the requirements of, the ESIF equality and diversity theme. Equality should be integrated into all aspects of project planning, development, implementation, monitoring and evaluation. It must be embedded not only within the services the project provides, but also in the way the project is delivered.

All applicants must produce an Equality Policy and where relevant, an Implementation Plan which should be reviewed regularly. The Policy must contain a general statement which recognises the importance of the Equality Act 2010. The Equality Act states that meeting different needs including taking steps to take account of disabled people's needs.

The Implementation Plan should set out how the project will turn its equality commitment into action. The Plan should cover how staff will be trained in equality and diversity and how this training will be reviewed; e.g. annual monitoring of staff by characteristics – sex, race, disability, age (with a view to identifying any significant under-representation) where appropriate; whether staff have equality objectives in personal development and appraisal processes; how the Policy will be communicated to staff, participants and where appropriate, other organisations involved in the project; how the Project will monitor its performance in terms of representation of different groups.

Applicants must demonstrate that their proposal will be delivered in line with equality law and regulatory requirements, and that it will not adversely impact, or discriminate against (directly or indirectly) people with any of the nine protected characteristics under the Equality Act 2010 (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation). The 2010 Equality Act provides a framework to effectively tackle disadvantage and discrimination.

The law requires due regard be given to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not;
- Foster good relations between people who share a protected characteristic and those who do not.





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The Equality Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people;
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

<https://www.equalityhumanrights.com/en/equality-act/equality-act-2010>

The EU Common Provision Regulations require that equality between men and women and the integration of gender perspective are taken into account and promoted. Accessibility for people with disabilities must also be taken into account throughout the preparation and implementation of projects.

Further information can be found in Article 7 of the Common Provisions Regulation.

The broad equality principles of the CLLD Programme are:

- No beneficiaries to be excluded from participation in the Programme on the grounds of their protected characteristics;
- The needs of all potential beneficiaries and participants are considered at project design stage in order that the service is appropriately delivered;
- All physical regeneration i.e. new buildings and upgrading existing premises are expected to meet minimum accessibility requirements (Equality Act, Part M of Building Regulations and recommended British Standards for accessibility). It is good practice to exceed these minimum standards where possible;
- Services are responsive to the needs of all communities and under-represented groups;
- Support is targeted towards under-represented communities where relevant;
- Responsiveness to, and inclusiveness of, under-represented groups in delivery and management;
- Public facing documentation and marketing materials will be offered in alternative formats upon request. A variety of marketing methods will be used to reach as wide a range of audiences as possible;
- The Area Facilitators will provide a comprehensive support service to assist businesses and community applicants in an appropriate and targeted manner to enable an effective signposting and information service to be provided based on individual project applicant requirements and need;
- Information will be provided on a comprehensive CLLD website which will be used to signpost potential applicants towards information, advisory services and partners

Monitoring requirements for beneficiaries will be advised by the CLLD Team in line with Cornwall Development Company's Equality of Opportunity Policy and monitoring requirements agreed by the Managing Authorities but broadly speaking these requirements will be under the categories of age, gender, ethnicity and disability.





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When applicants are developing their projects and drafting the application form, consideration to including the following should be given where relevant. This list is not exhaustive.

- Ensure that the Equal Opportunities and Non-discrimination Cross Cutting Theme is embedded into the project from the outset;
- Ensure that equality between men and women will be considered and demonstrated throughout the preparation and implementation of the project;
- Ensure female participation in the project, and through innovative recruitment practices;
- Ensure all project staff benefit from the principles of equal pay for equal work;
- Provide an Equality and Diversity policy and Action Plan for the project and detail how this will be communicated to project staff and partners;
- Where appropriate, carry out a project specific equality impact assessment, and produce an action plan with SMART (specific, measurable, achievable, realistic, timely) targets where actions are identified;
- Ensure it is clear in the application that the organisation making the application (and any associated delivery partners) complies with the Equality Act 2010 and associated legislation;
- Proactively take steps to take account of the needs of disabled people. This may involve having due consideration for treating some people more favourably than others;
- Consider the content accessibility of project websites. A recognised appropriate level is W3C AA (World Wide Web consortium priority/level 2);
- Ensure that capital builds appropriately consider accessibility. The use of the Social Sustainability Toolkit is an excellent tool to help inform the design;
- Ensure that for capital builds, design stage and post construction access audits are carried out by a NRAC (National Register of Access Consultants) qualified access consultant or through a pan disability group (a disability consultation approach is particularly suited to public realm or public facing projects);
- Offer public facing project documentation in alternative formats upon request;
- Provide mandatory E&D training for all project staff so that they have a good understanding of the diverse needs of different people;
- Evidence how the project will support a culture of equal opportunities and treatment;
- Ensure that events venues (including, but not limited to consultation events) provide proper accessibility;
- Monitor and report against the cross cutting themes during the life of the project.

Further information and support, including documents in different formats, is available through the Community Led Local Development Team at Cornwall Development Company.





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Below are some useful website links:

Sustainability

<https://www.british-assessment.co.uk/guides/writing-a-sustainability-policy/>

<https://www.british-assessment.co.uk/guides/hints-and-tips-on-creating-a-green-office/>

Equality & Diversity

<https://www.highspeedtraining.co.uk/hub/equality-and-diversity-policy-template-guidance/>

