SICAP Programme Requirements
Training Sessions with PIs - January 2018
Questions Requiring Follow-up

Issued March 2018

POLICY/PROGRAMME DESIGN

1. **The community development definition in the PRs is very narrow and does not encompass economic development which is the priority in many rural areas.**

It is accepted that there are many definitions for community development and some may be more applicable in rural areas. However SICAP is a social inclusion programme and economic development is not the core focus, which is funded by other local authority/LCDC funding streams. SICAP is unique in taking a community development approach which is focused on groups/individuals identifying their own needs and taking control of their own community destination.

2. **It states in the PRs that PIs must deal with referrals from JobPath. We as a PI have not had referrals from JobPath and there could be a duplication of service if someone is receiving JobPath supports and SICAP supports. In addition, new rules mean that after completing 12 months the client has a reduced timeframe before going back into JobPath so this may not leave sufficient time to be engaged by SICAP.**

PIs may receive referrals from Intreo and other services such as JobPath and the PI must deal with any specific referrals and co-operate with any referrals and reporting protocols agreed by DEASP, DRCD and the LCDC locally. The Department is reviewing the Protocol with DEASP which will encompass JobPath and will provide an update on this at a later date.

3. **How can we show impact more and specifically how can local areas set out what impacts they want to achieve and thus record if they've achieved them?**

There is a pre-determined set of SICAP outcomes in order to ensure consistency and comparability nationally. However, recording impact under SICAP 2018 will be simpler because the programme has fewer outcomes and indicators and the new qualitative measures will help to show impact e.g. LCG support plan and summary report card. In addition, there is a space in IRIS where the PI can record other outcomes under an action – a free text box under 'description' - 'expected outcomes' where you can elaborate on other outcomes. These are not linked back to tender or programme outcomes but they give a very good sense of the action. Also, as the PI updates the action they have a 'progress report' section which can be updated. This was under the old IRIS and PIs tended to complete it in a lot of detail.

4. **Query on working under Goal 2 within school setting (p.35). There are exceptions to that rule because some actions in working within schools are already in the annual plan that was submitted in the tender and agreed.**

The Programme Requirements state if young people (15-18) are receiving SICAP supports on a one-to-one basis they can only be registered as individuals if they receive interventions that are separate and outside of the school environment. Otherwise they should be engaged in group-based activities only through Beneficiary Type 4: Children and Families. This was introduced under SICAP 2015 –

2017 in order to prevent larger scale registrations of classes of students, and thus is not a programme change and should not be included in 2018 annual plans. It is clear that valuable projects can take place in school however this should be engaging with students in a group setting. It may be that particular projects requiring individual work in school can take place however this would need specific approval from the LCDC and approval by the school authorities and evidence that is targeted. Pobal is engaging with the Department on this and will respond with more details in due course.

FINANCE/AUDIT

5. Can a local community grant cover the costs of transport to attend events etc.?

If transport and the event is organised by LDCs then the costs could form part of action costs. It is up to LDCs to make the call but essentially grants should be specific in meeting the needs identified by the LCGs. The purpose of the grant is to support the LCG itself. If the transport costs are incurred by LCG members this is eligible as per PRs (p.74). However, if for example the transport is for those benefitting from an LCG activity, e.g. children going on a day trip, this should not be covered via an LCG grant. In this case the LDC should have hired the bus directly and included this is an action.

6. It appears that public liability is not eligible for a LCG grant. Can this be revised?

Public liability is not an eligible cost as it is considered to be an on-going running cost which is not eligible expenditure (see PRs p.74).

7. If an employee is 40% funded by the HSE and is a full-time SICAP worker, do we only need a 60% timesheet for that worker showing their time spent on SICAP?

The person should keep a timesheet for all of their working week, not just the 60% proportion as funded by SICAP. It is presumed that this is a SICAP-led action and the person is working fully on SICAP but is funded by the HSE as the HSE considers it to be linked to their work in a particular area or target group. In order not to double count outputs, SICAP should only be claiming 60% of the outputs and 40% of the outputs should be claimed by the HSE.

8. Is there a possibility that Department representatives could liaise with their colleagues in the rural section with regard to the apportionment policy requirement? The SICAP requirement are much simpler than the Rural Development Programme - is there a possibility of harmonising both programmes?

Each programme has its own separate reporting requirements. Our understanding is that the rural development programme operates in the context of monthly financial returns where consequently changes to the apportionment of costs are required to be made on a monthly basis. SICAP requires a review of the apportionment policy four times a year as there are only two reporting periods in the year. Therefore it is not possible to align the requirements for the review of apportionment policies for both programmes.

9. Do we need to keep updated paper copies of the interventions/outputs & results section of the beneficiary templates as well as updating it on IRIS? We do this currently as we were informed by audit that it was required and find it is a huge duplication of work as it means updating paper copies as well as the online records.

The Department has been engaging with the Local Government Audit Service on this to clarify processes and requirements. A separate update on this will be issued.

10. **Regarding the retention of documentation for LCDP and SICAP 2015-17, can it be clarified how long this documentation should be kept? This includes financial files, beneficiary files and EU programme requirements.**

Pobal is liaising with the Department and the ESF on requirements around previous and current programme data retention.

11. **Audits have noted that every Personal Action Plan is different, is there a specific template?**

Pobal has made available two copies of Personal Action Plans which were considered to be good examples. These can be accessed online on the [SICAP website](#), clicking the righthand link 'Guidance and Support in completing Personal Action Plans including examples'. PAPs can be different as they are related to the specific needs of individuals, as long as minimum requirements as per the SICAP 2018 PRs are met.

12. **Leveraged funding is not being captured by the programme. There has been a change in rules on audited accounts which now means this type of funding can be verified.**

Levered funding can be recorded against an action and against a collaboration partner and in the PI end of year report. It is not included in the financial figures as leveraged funding is not an accounting principle. We think this change referred to in the question concerns Schedule 13 which states that state/department funding has to be acknowledged in the accounts. However, notwithstanding, there remains no way to verify that this is leveraged funding.

13. **Can LDCs cover the cost of publishing research and costs for foreign travel from SICAP?**

There are no restrictions to undertake local research or publish reports with the understanding of the following:

- The research/report focuses on work supported through SICAP and clearly shows the impact and benefits of SICAP and be linked to the SICAP annual plan.
- The LDC liaise and agree in advance with their LCDC on the need and focus of this work and that careful consideration is given to value for money.
- It is good practice to disseminate this research.

Travel outside of the jurisdictions of the Republic of Ireland and Northern Ireland is not permitted.

14. **Should collaboration with schools and colleges be considered sub-contracting? For example, a PI is working with a local school and co-funding a new resource teacher. In short, how can PIs contribute SICAP funding to external actions?**

The example given is considered to be sub-contracting under SICAP rules. You would be sub-contracting to a school i.e. the PI is paying for someone else to deliver services which contribute to SICAP outcomes. If SICAP is sub-contracting to a state funded body such as a school, university, IT, ETB etc., the PI needs to ensure that it is not providing SICAP money where core funding already exists. For example, is there a need to sub-contract to a school to provide a new resource teacher or deliver a particular programme with potential early school leavers when the school is receiving funding from DEIS, SCP etc.?

Note also that ETBs are co-financed under ESF PEIL. There is a need to be cautious here as per ESF Circular 1/2016 (i.e. that the same tutor is not being paid twice) and also Annex D for potential double-reporting. All sub-contracting must be 30% or less than the Lot budget.

DATA /MONITORING

15. Can clarification be given on what the data that is being collected for via the PPSN is being used for and what third party sharing of information there will be where PPSNs are provided.

Pobal and the Department are both working on this to provide the necessary detail.

16. The new programme only gives two genders which is restrictive. The gender question in the registration template/IRIS does not given an option for gender fluidity.

We have been liaising with LGBT Ireland and TENI on this in identifying appropriate options. We will be amending this in the summer edition of the Programme Requirements and updating IRIS accordingly by adding another option to Male and Female, Other Gender. This will include a descriptor box if selected where information can be entered e.g. Non-binary.

17. There is information missing on the beneficiary template for social enterprises. The templates do not ask about employees who are volunteers/contractors and there are limited indicators.

We are reviewing this and have received feedback separately from a Local Development Company on additional information to gather.

18. If clients complete the pre-registration and sign the data consent will they be required to sign the data consent form again when full registration is completed?

A new data consent form would need to be signed to reflect the new information the individual has consented to give relating to sensitive data/sharing of data for referrals/contacted for evaluations. They will also need to sign the full registration form as normal for a fully registered individual.

19. Will existing clients be brought over into new programme?

Yes, 2017 individuals and LCGs will be migrated over into the new system.

20. Are records carried over from SICAP 2015 – 2017?

Information from SICAP 2015-2017 will be carried over but the individual/LCG will have to re-register on the new programme and their record will have to be updated e.g. to ensure their economic status, education status etc. is correct at the point of registration with the new programme. LCGs will have to go through the new questions and add in the additional information to form the LCG Support Plan.

21. Will it be possible to view an intervention from 2017 that someone received?

The old system will still be live and PIs still have access to this. If they want to check an intervention from the programme they can go into this and check as normal. No other information except the registration profile will be carried over into IRIS 2018 – 2022.

22. If certain LCGs are using the personal details of their voluntary members as contact details for the organisation do they have to complete a data consent form?

The contact details for an LCG may be the contact details for an individual but regardless the individual does not have to complete a consent form as they are providing the contact point for an organisation. This was approved by a data protection expert group. We would recommend that LCGs be encouraged to set up a group specific email address rather than relying on personal email addresses.

23. What happens with the 6 month follow up for clients under the old programme?

If this client was registered under SICAP 2015 – 2017 and a 6 month/other follow-up is required, the PI should ensure that this follow-up takes place as per the Programme Requirements for SICAP 2015 – 2017.

24. What defines the exit date for ESF? Is it the last intervention?

The exit date is the date of the last intervention or SICAP course end date (whichever is the latest). The LDC can record the exit date and result data as part of the intervention if they know the person is not expected to return for further interventions. If the person is due to return but doesn't then the LDC can follow up and record the exit date as the date of last intervention and ask the individual for their status at that date.

Status (result indicators) can also be requested retrospectively. So if the LDC follows up with the individual in March and the person requires no further SICAP engagement, the exit date is the date of last intervention. If the date of last intervention was December the person is asked what their status was in December.

Note that follow up regarding exit date status and the six month after exit status can be done by email. Each LDC will record a note on the beneficiary file regarding the follow up and update IRIS accordingly. LDCs should only keep Individual files at 'Open' status if they are expecting the person to return for further interventions. When an exit date has been inputted the file status should move to 'Closed' (this can be an automated process on IRIS).

25. Is a 3 month call back still required?

The three month call-back with clients was designed to act as a prompt to assist PIs in managing their caseload and to check if the individual file was live. It was about record/caseload management and to close off files. This good practice should continue under SICAP 2018.

26. We disagree with designating PIs as data controllers – they are not data controllers and simply enter data into a system designed by Pobal. It is unfair to place that additional responsibility on PIs as they do not determine the purposes and means of processing personal data.

The designations were provisionally reviewed and approved by data experts. However, a Privacy Impact Assessment for SICAP is due to be carried out and the position will be reviewed in light of the outcome of that assessment.

27. Is the summary report card on IRIS dynamic i.e. will you be able to click on any of the headline information to find the individual files?

It is not dynamic but we are looking into this and will explore whether it's possible to provide dynamic flexibility at a later date.

28. Will there be support for LDCs provided through the programme on the new data protection regulations?

Specific support will not be provided on this under SICAP. Each Local Development Company is responsible for ensuring that it is compliant with the GDPR and is a wider issue to manage as it relates to all programmes managed by Local Development Companies. The ILDN as the representative body for the country's 49 Local Development Companies may wish to play a role in this.

29. Can Pobal make the template for the PI annual report available earlier? If PIs had this earlier they could enter the information on an ongoing basis rather than everything at the end.

Pobal will make the template for the PI annual report template earlier in the year. However, the template from SICAP 2015 – 2017 has not changed over the years and LDCs could enter the information earlier.