Core Findings from

SICAP Inspection Visits 2016

SICAP

Social Inclusion & Community Activation Programme

Ireland's European Structural and Investment Funds Programmes 2014-2020
Co-funded by the Irish Government and the European Union

EUROPEAN UNION
Investing in your future
European Social Fund

An Roinn Tithíochta, Pleanála, Pobail agus Rialtais Áitiúil
Department of Housing, Planning, Community and Local Government

In the recent series of SICAP Inspection Visits undertaken by Pobal, we identified a number of core common issues that were emerging from these visits. In order to assist PIs, consortium members, and sub-contractors in ensuring that they are compliant with all SICAP requirements, the following are the core issues that PIs need to be aware off and ensure that appropriate internal systems and processes are in place to address them;

Beneficiary files

A review of a sample of beneficiary action files highlighted a number of errors, omissions, etc. including

- Programme Implementers (PIs) must ensure accuracy between the information reported on IRIS and the information recorded on the beneficiaries' files held in the PI office(s).
- All individual beneficiary files must include the following documents:
  - A copy of the registration form and Personal Action Plan.
  - A record of training completion date and details of training input on IRIS by PI.
  - A copy of the training certificate awarded on file (both internal and external certificates).
  - Evidence of follow up / progression of beneficiaries within the timeframes required.
    - Data Consent forms
- **For <u>all 15 to 24 year old beneficiaries</u>** the file must include all the points noted above and
  - Copies of sign-in sheets/attendance records for all training undertaken.
- All individuals supported under SICAP (both caseload and non-caseload reported individuals) should be target groups members.
- Comprehensive beneficiary files must be in place as and from the 1st April 2015, if applicable.

Course/Training Files

- Must include evidence that trainers/tutors' are suitability qualified to provide SICAP training programmes i.e. copies trainers/tutors certificates.

Administration & Apportionment

- The PI's books and records must be readily identifiable to the expenditure reported on IRIS.
- PI's must maintain detailed summaries of all **sub-contractor costs** incurred annually to ensure only a maximum of 15% of the total SICAP expenditure was incurred on sub-contracting.
- SICAP expenditure cannot be back dated i.e. January 2018 expenditure cannot be reported as 2017 SICAP expenditure with the exception of outstanding cheques where they have been actually issued to payee and are cashed within a reasonable timeframe (e.g. all cheques should be cashed at the bank within 1 month).
- Grants to individuals or Local Community Group (LCG) are ineligible under SICAP.
- A Programme Implementer (PI) or an organisation that is governed by a PI cannot be a SICAP LCG or allocated a Social Enterprise Grant.
- Unspent expenditure relating to internal SICAP bank transfers must be repaid on an annual basis.
- Board approved documented apportionment policies must be in place in respect of any shared costs whether between SICAP and non-SICAP funding or across the SICAP budget under the three Goals.
- Where staff costs are apportioned based on time then PI must prepare and retain supporting documentation (e.g. timesheets) clearly showing the time spent across different funding streams (i.e. SICAP, Leader, RSS, Tus, etc.) and/or across the 3 Goals.

Public Procurement / Tendering

- Full adherence to the Public Procurement requirements is essential under the SICAP Programme as follows:

- Under €5,000 – a note confirming that a verbal quotations from <u>one or more</u> suppliers was obtained i.e. a written note with the names of suppliers, the dates, the amounts quoted, etc.
- From €5,001 to €25,000 – obtain 3 written quotations.
- For over €25,001 – use a formal tendering process i.e. a public tender document or directly invite at least five suitably qualified suppliers to bid, copies of written tenders, tender analysis/scorecards, letters to successful and unsuccessful suppliers, etc.
- For goods and services over the relevant EU threshold: ensure the EU regulations are fully adhered to.

Other Points of Note:

- PI's must fully comply with all SICAP **publicity requirements.**
- PI's must be able to demonstrate they have considered **Equality and Diversity** in regard to the operation of SICAP.
- Evidence must be prepared and retained for inspection showing **whether PIs have considered that all offices used for SICAP are accessible to all beneficiaries**.

To assist PIs in adhering to the above, Pobal have developed a series of Checklists on the contents of core files that should be maintained by PIs in order to adhere to SICAP requirements and these files are as follows;

Appendix One
Checklist for Individual Beneficiary Files

Registration Form

☐ Is the registration form on file?

☐ Is the registration form on file the most up-to-date version ?

☐ Is the registration form fully completed?

- ➢ If no, where are the gaps?
- ➢ What areas need to be followed up - target group, sensitive questions, etc.?
- ➢ If the gaps are due to the individual refusing to answer certain questions, please confirm with the individual that 'No response' will be recorded on the file.

☐ Has the individual been verbally informed of the public funding sources for SICAP – e.g. DHPCLG, ESF, YEI etc.?

☐ Is the form signed and dated by the individual and the staff member?

➢ For guidance on completing the registration form, please refer to section 5 of the Training Guide to complete the Individual Registration form

Signed Data Consent Form

☐ Is the data consent form on file?

☐ Is the data consent form signed by the individual and the staff member?

☐ If the PI uses another data management system in addition to IRIS, it is stated on the form

➢ If the beneficiary has not given their consent for personal information to be recorded, no record should be created on IRIS.

Personal Action Plan (PAP)

☐ Does the file include a Personal Action Plan?

➢ If yes, does the PAP include:

☐ An assessment of the client's education/skills

☐ On overview of their employment history

☐ Outline their areas of interest/goals under the programme

☐ Any barriers they may face in accessing mainstream education or employment

☐ Proposed defined pathways and agreed next steps

➢ If no, to any of the above, what follow up is required?

☐ Does the PAP include a rationale for support needed under another programme?

☐ Has the PAP been updated every 6 months?

- Please note the PAP should reflect the list of interventions recorded on IRIS
- Also updated guidance and support documentation in completing a Personal Action Plan including examples are available here
- For further information please refer to section 3.4 of the programme requirements guide

Enterprise Grants

☐ Has the individual received a SICAP funded enterprise grant?

- If yes, the file should include the following evidence that:

    ☐ It is a start-up micro-enterprise with less than 10 employees

    ☐ Only one grant was provided per business plan

    ☐ At least half of the 20% match-funding requirement is paid in cash and independently vouched.

    ☐ Displacement of existing jobs was considered

    ☐ There is a need for the grant

    ☐ Documentary evidence of costs

Loan Fund

☐ Has the individual received a loan funded by the SICAP revolving loan fund?

- If yes, the file should include evidence that:

    ☐ The PI screened the individual for suitability

    ☐ The PI made the decision to approve the loan

    ☐ Details of the loan amount, term of the loan and interest charged.

    ☐ Summary of repayments made

    ☐ Confirm that SICAP funds are used as security only on the loan

    ☐ Copies of the agreement with the Credit Institution, and/or any correspondence regarding the operation of the loan fund.

- Please note the PI may not allocate more than 15% of the goal 3 action cost to enterprise grants and revolving loans over 12 months.
- For further details, see section 5.5 of the programme requirements guide in respect of enterprise grants & loan funds.

Training and Certification

☐ If the individual has completed training as part of their participation on SICAP, does the file include copies of all certification achieved?

- Please note this should include all certified training for the participant that is directly funded by SICAP (actual provision may be internal or external).

Attendance Sheets

☐ If the individual is aged between 15-24 years and eligible for co-financing under the ESF PEIL (2014-2020), are there signed attendance sheets for all SICAP training, workshops and mentoring sessions the individual participated on, in their personal file?

☐ If the individual is not within this age bracket, are there signed attendance records for all training, workshops and/or mentoring sessions participated on, in the Course/ Training file?

Follow-up requirements on IRIS to reflect progression

☐ Has the IRIS system been updated to reflect the necessary follow up for this individual as per the Programme Requirements?

☐ For young people aged between 15-24 years co-financed under ESF PEIL (2014-2020) – has follow up taken place within 4 weeks of exit from the intervention and again 6 months following exit from the intervention?

☐ For all other individuals – Has follow up taken place 6 months after the last recorded contact?

☐ Confirm the number of new businesses operating 12 months after establishment in respect of individuals progressing to self-employment after receiving a Goal 3 employment support. (Objective G3.2 - Headline Indicators)

- Please note there are system views on IRIS to assist in this process. Please refer to sections 3.3, 4.3 and 4.4 of the programme requirements for further details.

Please use this individual beneficiary file checklist in conjunction with guidance and support documentation issued by Pobal based on the learning from the inspection visits. This aims to assist PIs in adhering to specific SICAP rules and regulations. See link here.

Appendix Two
Checklist for Finance Files

Lot No:
Year:

Board Minutes

☐ Apportionment Policy – Policy should be signed off at the appropriate level. Please note if staff time is used as a basis of apportionments, appropriate documentation must be in place to support same (e.g. timesheets)

☐ TCAN for payees over €10,000, and tax reference numbers for payees over €650

☐ Staffing Sheet and any subsequent changes during year

☐ Annual Budget (printed from IRIS)

☐ List of all Subcontractors, prepared on an annual basis, including amounts paid to ensure the 15% limit is not exceeded.

Claim 1 – Mid Year

☐ Signed Individual Cost charged report

☐ Evidence that Public Procurement requirements have been met (as applicable)

☐ Invoices that relate to SICAP

☐ Payroll documentation for SICAP funded staff members

☐ Timesheets for SICAP funded staff members, which can be clearly linked to the PI's apportionment policy, if applicable.

☐ Bank statements / Agresso / Evidence of Payments

☐ Travel and Subsistence claims for SICAP funded staff

Claim 2 – End of Year

☐ Signed Individual Cost charged report

☐ Evidence that Public Procurement requirements have been met (as applicable)

☐ Invoices that relate to SICAP

☐ Payroll documentation for SICAP funded staff members

☐ Timesheets for SICAP funded staff members, which can be clearly linked to the PI's apportionment policy, if applicable.

☐ Bank statements / Agresso / Evidence of Payments

☐ Travel and Subsistence claims for SICAP funded staff

SICAP related Correspondence

☐ Audit/Verification/Inspection reports including their actions against the report

☐ Lease agreements for offices where SICAP staff are based

☐ Fixed Asset Register

Appendix Three
Checklist for Training/Course Files

Name of course	
Name of lead staff member	
Name of training provider	

☐ Does the file provide course details including duration, course content and evidence of lesson plans?

☐ Is there evidence of tutor qualifications and/or certified by an independent body?

☐ Is there evidence on file that pubic procurement was undertaken and that it is in line with EU requirements, including a formal tendering process, if appropriate?

☐ Are the training costs paid to tutors/trainers/course providers recorded on the PI's annual sub-contractor list, where appropriate?

☐ Is there a list of course attendees?

☐ Are there signed attendance records for each training session on file?

☐ Is there evidence of the level of accreditation on completion of the course?

☐ Is there evidence on file confirming who funded the training i.e. 100% SICAP, part funded by SICAP or non-SICAP fully or partially funding?

☐ Please note if SICAP funded (100% or partial), ensure there is evidence of expenditure incurred for the individual trained or evidence of SICAP staff hours spent providing the training to the individual participant.

☐ Is there evidence on file to confirm that the SICAP publicity requirements in terms of communication and publicity have been adhered to fully?

☐ Are individuals undertaking SICAP funded training courses aware of the funding sources for SICAP – e.g. DHPCLG, ESF, YEI, etc.?