19 April, 2016

Dear CEO

As you are aware, Pobal acting on behalf of the DECLG will be undertaking the verification/audit role of SICAP. As part of this role, Pobal piloted five inspection visits in late 2015 to assist in identifying the core issues that may emerge in these visits and to look at the appropriate responses that should be put in place by PIs to address these issues. This communication is the first of other guidance documents that will issue to assist Programme Implementers in adhering to a number of key SICAP rules and regulations and ensuring that issues from the pilot inspections are addressed by all PIs.

We also wish to provide clarification on a number of issues received from the relevant bodies responsible for the operation of the ESF co-funded element of the SICAP funding. It is important to note these clarifications are set in the context of the strictness that is applied to EU funding rules / regulations and the severe sanctions/losses that could be imposed on PIs and the national exchequer, if any on-the-spot audit/verification visits undertaken contributes towards an overall error rate of 2%.

The expectation is that SICAP Programme Requirements would be fully implemented and if applicable, any deviations or omissions addressed retrospectively e.g. Beneficiary files. We would anticipate that the issues highlighted below will be addressed by Programme Implementers and therefore will not arise at any future audit/verification visits conducted by LCDC, Pobal, the Department and or the EU in relation to the SICAP programme.

The key issues that need to be addressed by PIs in order to ensure full compliance with SICAP rules and regulations are as follows:

**Beneficiary files**

Individual beneficiary files must be maintained under the SICAP programme, which supports the target/outputs reported by your organisation, namely;

- Detailed registration forms must clearly identify which target group the beneficiary belongs too.
- Beneficiaries must self-certify (sign and date) their registration forms to confirm the information therein. Pobal will be issuing a revised registration template to assist PIs in this regard and this will also be put on the Pobal website from 20 April, 2016. We have agreed with the relevant bodies that this self-certification does not need to be undertaken retrospectively. However, the revised registration template will need to be used to meet the self-certification requirement going forward.
- Comprehensive Personal Action Plans (PAPs) must be prepared in line with the clear guidance provided on pages 41/42 of the SICAP Programme Requirements Document. To support all Programme Implementers in meeting the minimum requirements for PAPs, we are issuing additional guidance with this communication (see appendix one).
- Training attendance records and copies of certificates of course completion are required to be retained on file for both internal and external training undertaken by SICAP beneficiaries.
- Performance Implementers’ must be able to demonstrate documentary evidence that tutors’ are suitability qualified to provide SICAP training programmes. In addition, records must be maintained by the PIs showing that 15% of all Life Long Training is accredited training (i.e. QQI or industry equivalent).

Please visit www.pobal.ie for more information on Pobal

Directors: Mr Seamus Boland (Chairperson), Ms Anne Costello, Mr William Cotter, Ms Ruth Cullen, Mr Liam Keane, Ms Helen Keogh, Ms Patricia King, Mr Tommy McGuire, Ms Jenny McLough, Ms Siobhan McLaughlin, Ms Mary Mooney, Mr Denis O’Brien, Mr Gerald Quinn, Ms Catherine Travers, Ms Marian Vickers, Mr John Walsh, CEO, Mr Denis Leeney.

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• Ensure PI’s, including consortium and sub-contractors, have specifically informed NEET beneficiaries that they were receiving financial support with co-funding from the European Social Fund including a special allocation under the Youth Employment Initiative.

Apportionment and related Supporting Documentation
• A written apportionment policy must be in place in respect of all SICAP funded shared overheads/salaries.
• The policy must include documented rationales for the basis/rates used.
• Where staff salary costs are apportioned across a number of different funding streams including SICAP, the PIs or their consortium members, must have supporting documentation (e.g. timesheets) prepared and retained which records all staff time worked in respect of the various funding streams.
• Where a staff salary cost is apportioned across the Goals, regardless of the salary cost being 100% funded through SICAP or co-funded with other funding streams, PIs or their consortiums must also have supporting documentation (e.g. timesheets) to evidence the time spent working on each relevant Goal. This is required (in the event of an audit / on-the-spot verification) to provide evidence of compliance with the % parameters of spend reported against each Goal as per Schedule D of the contract.
• Please note supporting documentation regarding staff time could be inspected as part of any on-the-spot SICAP visit, and must be available for review from the commencement of the Programme to the date of the visit.

Public Procurement / Tendering
• PI’s, including consortium and sub-contractors must adhere to the Public Procurement Guidelines, in accordance with the national rules as outlined in the link contained within section 5.5 of the SICAP Programme Requirement document. Please note below are examples of some of the key public procurement rules currently in place but all rules outlined in the document referred to in the SICAP Programme Requirements must be fully adhered to.
  ➢ Evidence verbal quotations were obtained from one or more suppliers for payments under €5,000 i.e. a written note with the names of suppliers, the dates, the amounts quoted, etc. Key point to note: (As and from 1st April 2015: it is essential that PIs, including consortium and sub-contractors, have written evidence (i.e. a brief note) they obtained verbal quotes from one or more suppliers for the purchase of items under €5,000).
  ➢ For goods and services in excess €5,001 and less than €25,000 confirm at least written 3 quotations were obtained. If the lowest quotation was not selected then there should be a documented rationale available regarding the selection process/criteria.
  ➢ For goods and services over €25,001 to the relevant EU threshold, PIs should have a formal tendering process i.e. a tender document publicly advertised or directly invite at least five suitably qualified suppliers to bid, copies of written tenders, tender analysis/scorecard, letters to successful and unsuccessful suppliers, etc.
  ➢ For goods and services over the relevant EU threshold: ensure the EU regulations are fully adhered to.
• Any payments to 3rd party suppliers, sub-contractors, consortium member between €650 and €10,000 requires a written declaration be provided, stating that their tax affairs are in order, and quoting their tax reference number.
Other Points of Note:

PIs, including consortium and sub-contractors, must be able to demonstrate their compliance with the following:

- Full compliance with all SICAP publicity requirements in all related informational and publicity material. In addition the following logos, along with the associated strapline wording should be used:
  - Ireland’s European Structural and Investment Funds
  - European Social Funds*
  - Department of the Environment, Community and Local Government
  - SICAP
  - *Please note the ESF logo must be the same size as the biggest of the other logos.

A review of the publicity material will form part of any verification/inspection visits and to facilitate this, hard copies of publicity material must be retained on an on-going basis. We have also attached for your information a copy of the ESF Communication and Publicity Guidelines 2014-2020.

- Documentary evidence of Equality, Diversity must be available for review e.g. company Equality and Diversity policies, disability access audits on all SICAP offices, examples of equality opportunities in advertising, relevant extracts regarding Equality and Diversity on company website, etc.

- Documentary evidence that only a maximum of 15% of the total SICAP expenditure was incurred on sub-contractors i.e. a listing of the annual sub-contractors costs incurred.

We would hope this document is helpful guide to assist your organisation avoid the above pitfalls and thus ensuring the eligibility of the expenditure and target outputs reported under SICAP. It might also be useful where practical and reasonable for PIs to consider a single audit approach for your company going forward, that would be based on and satisfy the ESF requirements.

We look forward to issuing the next and further instalments of best practice guidance in relation to meeting programme requirements over the next number of months.

Yours Sincerely

Paul Skinnader
Executive Director
Community Support and Services Directorate
Appendix One

Personal Action Plans
In order to assist Programme Implementers in understanding the compliance requirements for Personal Action Plans, Pobal has revised the relevant section in the Programme Requirements. The requirements contained below is what needs to be followed and complied with from this date. The text will be updated in the next version of the Programme Requirements which will be issued in due course.

Pobal is circulating some examples of templates which have been developed by Programme Implementers. We wish to thank the two Programme Implementers and their teams for allowing us share and highlight their work. These templates were developed in-house by staff members within the companies and have proven to be very useful and beneficial.

Please note that these templates should be used as a useful guide on the minimum standard of a PAP in order to be compliant with SICAP requirements. There are other examples and formats out there and it is up to each company to choose a format that suits their needs and client management procedure. Programme Implementers need to ensure that Personal Action Plans are updated regularly and that the pathways indicated reflect the supports and output records indicated on IRIS.

Programme Requirements

Personal Action Plans and one to one Meetings
Each individual registered with SICAP must have a Personal Action Plan which is tailored to fit their needs. The support worker will discuss with the client the kinds of assistance they would benefit most from, and work with them in drawing up a Personal Action Plan which sets out their goals and plan for the coming months.

Please note that individuals who are involved in cultural activities under goal 1 and children and young people under 18 years of age who are involved in an afterschool club or homework supports are not required to have a Personal Action Plan. All other individuals must have a Personal Action Plan.

Each PAP must follow the steps below:
1. Be drawn up after the registration meeting;
2. Be updated after each interaction;
3. Be informed by individuals' own personal assessment of their skills and key competencies etc.;
4. Be formally reviewed with the individual after six months;

Each PAP must include, at a minimum, the following elements:
1. Assessment of client's education/skills;
2. Overview of their employment history;
3. Outline their areas of interest/goals under the programme;
4. Any barriers they may face in accessing mainstream education or employment e.g. English language ability or limited access to transport;
5. Proposed pathways and agreed next steps;
Note: If the client is under 25 and receiving a complementary YEI intervention (e.g. on Tus or Youtheach) this needs to be indicated in the action plan e.g. also on Tus on a work placement.

These are the minimum requirements to ensure compliance with the programme management verification process – auditors will be checking to ensure these five core areas are included in each Personal Action Plan and PIs can supplement these with additional information if they think useful. Programme Implementers should apply the methodology they proposed in their tender relating to how they will design and maintain Personal Action Plans so that they meet individual’s needs.

Programme Implementers must ensure that individuals are sufficiently engaged and given the opportunity to reflect on their own abilities, aspirations and progression pathways at regular stages - at a minimum at the commencement and completion of engagement and during the formal six month review process. Setting out pathways via the Personal Action Plan is critical to show how clients can better access support/mainstream services. This will include following up with clients once they are in a training course or work to provide continued support and mentoring, and thereby increase the likelihood that they remain in work or in education.

Personal Action Plans do not need to be long documents – they should be brief overviews of the points above and designed in such a way that helps the client and the PI support worker. The PI support worker can fill it out with the client or the client can complete parts of it themselves. It might be useful to ask the client if they would like a copy to take home with them so they have a record of their goals and agreed action points.

Relevant information gathered during the Personal Action Plan and at follow-up one-to-one meetings may need to be entered into IRIS for that individual, such as changes to contact information or any progression or outcomes. There is no requirement to upload the PAP onto IRIS.

Employment/education support workers, and youth support workers when interacting with their client cohort, will be best placed to prepare the Personal Action Plan with each individual. They will play a central role in delivering supports and will be expected to have the relevant expertise and experience to do so. The same support worker should work with an individual throughout their engagement with SICAP in order to ensure consistency, stability for the individual, and to allow a relationship of trust to develop.

The support workers determine with the client what actions and instruments would be most suitable for an individual. Their role could cut across a broad range of areas e.g. providing assistance with job search including CV and job application preparation, job interview skills, liaising with employers on training and work experience opportunities, suggesting education and training courses. They will be required to work with individuals so they gain workplace skills including confidence building, time management skills, team work and support the individual in the transition into education or employment. In addition, assistance to clients may encompass advising and helping them to access other locally available services which could impact on lifelong learning and employment, as well as broader quality of life and personal issues, for example managing a disability, drug or alcohol addiction, advocacy in relation to housing issues, seeking advice on managing finances.