

## **Implementation Plan – consultation response**

This response is prepared by One East Midlands and lead voluntary sector support and development organisations on behalf of a wide constituency of voluntary sector contributors. Responses include the input from lead voluntary sector support organisations in each of the county and city areas across the D2N2 geography. Additional views on the consultation were gathered at 2 events held by One East Midlands in November 2014 and was supported by all remaining VCS members of the D2N2 Social Inclusion Advisory Group. A list of all contributors can be found at the end of this document in appendix b.

### **Consultation Questions**

#### **1. Are we focusing on the right activities to promote growth?**

Overall the Implementation plan identifies some strong initiatives that will support progress in some of the key sectors identified across Thematic Objectives. Less clear is the route / process for commissioning projects that fully meet the D2N2 area priorities and how those projects will work together to ensure added value.

The themes and projects identified do not reflect or appear to have fully considered cross-cutting issues such as need for geographical concentration and equality of access for disadvantaged or protected groups. Also missing is the mechanism by which social innovation will be encouraged or enabled – it is important that the overall programme creates space for the creation of new goods and services especially where delivery models also meet wider barriers to economic growth and how this will need to be part of the solution to achieving the set SEP objectives.

The parameters, in respect of T09, are unclear and despite some mention of enabling locally tailored support and solutions it is unclear how this will be undertaken to maximise benefit to the sector and enable them to support those furthest from the market place to engage in work. The programme must benefit from the production of locally based solutions and the subsequent initiatives need to enable a real widening of opportunities. The references to supported volunteering and navigator/mentoring roles will require imaginative locally based initiatives to raise aspirations and promote inclusion of those further from the labour markets in order to have maximum impact. We recommended that the Social Inclusion Advisory group play an active role in addressing this.

Consider a broader approach to add value to the stated priority sectors, including intervention for the VCS and social care sector; an ever growing market.

#### **2. Have we got the right number of activities and the right balance between them?**

The lack of a coherent and final position in terms of CLLD vs alternative delivery options makes it difficult to ascertain whether the social inclusion element is well balanced or appropriately targeted.

The balance overall is sufficient to meet SEP and ESIF expected outcomes. The approach on social exclusion and its links needs to be more explicit as do the growth opportunities previously highlighted. Additionally, D2N2 previously identified VCS development and growth as being an untapped potential market; this is not reflected within the document.

The links from T09 to 8 and 10 are referenced but no clear enabling mechanism set out within the document. If this is not to be specified or guided by the LEP then specific reference for applicants on the need to do so must be included within commissioning material.

Communication strategies need to underpin the document to ensure transparency and broad access to solutions. The creation of open solutions is required to ensure that future interventions will enjoy the involvement and ownership of all relevant business sectors and potential programme participants. Communications with employers locally will certainly need to be managed – some strategic thought on how this is best achieved across all thematic objectives and could be linked, conversely, with the support offer to local employers and businesses from the projects.

The commissioning principles within the programme should consider a flexible needs based approach to output targeting and information gathering should be undertaken to promote the benefits of providing business support developed on a holistic rather than a project by project basis.

**3. Have we got the balance right between specifying the activities that we would wish to see delivered and allowing for innovation and integration by applicants? If not, how could this be improved?**

For the majority of the activities in the LIP, clear, specific and precise activities to contribute to the delivery of the thematic objectives are set out. Whilst these are helpful in providing a clear picture of what the LEP believes will achieve its outcomes, there is a risk that they could be inflexible; so limiting innovation. Rather than being regarded as guidance in terms of the approach the LEP seeks to take, they may be seen as the only approach that will be successful in achieving funding. This risks deterring approaches that are innovative or could achieve the “2 for 1” activities that could maximise outcomes across different objectives.

Our suggestion is that the Implementation Plan should focus more on the outcomes that the LEP and partners would wish to see achieved rather than being too prescriptive over delivery and therefore lose flexibility and innovation.

**4. Have we got the approach to delivery through ‘opt-ins’ and calls right, what are the key issues that we need to consider?**

It is recognised that those organisations providing match funding at source will have clear views about the services they wish to see delivered as a result of their match funding. Guidance on the parameters for their contribution is therefore essential. However, this needs to be measured against an over prescriptive approach which could stifle innovation and a joined up approach. The social inclusion programme which sets out recommended commissioning principles and a pathway allows that flexibility.

One of the primary benefits of the ESIF Growth Programme is the ability to utilise both ESF and ERDF (and EAFRD) in a more coherent and integrated way in order to achieve improved outcomes. Unfortunately, the introduction of opt-in providers means that delivery is once again more likely to be isolated in one fund or other. The LEP must therefore work hard to ensure agreements with each opt in and their commissioning priorities reflect activity in other thematic areas. Not an easy task.

**5. Which of the delivery models outlined for our employment and skills programmes is most suitable for each programme?**

For this question we have raised additional queries for consideration against the proposed models:

### 8.1 EMPLOY Local:

- Will there be a single Apprenticeship hub across the area, or a single framework for supplying Apprenticeships? Changes in the process will see the funding go directly to the employer so how would this fit with a single supplier hub in terms of choice for the employer?
- How is the Preferred Training Network selected and supported?
- Is the Employer Training Bundle going to be available to sectors outside the targeted 8? – if not then how are we to stimulate entry level posts in other sectors such as health and social care?
- How will Traineeships fit with the DWP Sector Based Work Academies?
- Page 29 cites promoting self employment, but it is difficult to identify the link from within the EMPLOY Local delivery model plans for this aspect

### 8.2 Time2Change:

- Entry into the programme appears to be through NCS who undertake a Skills Health Check; TNA and develop a Pathway to Employment so will NCS also deliver the Time2Change element?
- Mentions differentiated delivery – is this inside the 2 week programme or outside? If outside, is there funding for local provision to deliver this?
- Could ESF Community Grants be a tool to underpin this differentiated delivery?
- What is the definition of Purposeful employment?

### 8.3 Unnamed:

- Primarily focussed on those already in employment?

### 8.4 Youth Employment Initiative for Nottingham:

- Concept is in line with current Nottingham plans, but why does 2016 have two thirds of the 2 year fund? Why no funds in 2017?

### 8.5 D2N2 Youth Engagement

- If this is targeted activity for unemployed and NEET, why are there 200 employed participants included?
- Is this the pre and post work wrapped around the Time2Change programme?

## **6. What are your views on our community level approach? Do you have a preference between a CLLD, D2N2 'bespoke' or mainstream only approach? What should a bespoke approach focus on?**

The D2N2 area already has a number of legacy 'CLLD' structures from former community investment & regeneration programmes such as New Deal for Communities and City Challenge. Examples in Nottingham include The Renewal Trust and Castle Cavendish. CLLD approaches do, therefore, leave legacy but we are unconvinced at this point that CLLD as a 'mechanism' is required within the D2N2 area.

The proposed alternative model of a bespoke 'combined' investment pot targeted at local areas is attractive. However, analysing the financial tables shows that a large proportion of this investment is likely to come from the social inclusion theme. We do not feel that targeted local economic approaches are likely to benefit those facing the most excluded – by definition we are more likely to see those most included and able in disadvantage communities benefiting from such an approach.

The present TO9 Opt In model will enable a level of community based intervention, however the size of the overall contract and the complexities of managing a delivery consortium mean that this investment is unlikely to reach those very small groups and organisations working at micro level. These groups can and do contribute directly to the achievement of LEP outcomes and therefore a mechanism for targeting resource very locally would be a benefit to both the groups and the LEP.

A bespoke approach to this community level strand therefore seems more appropriate. As a bespoke approach, these structures could receive a ring fenced allocation of Community Grant to deliver the more localised employability pathways projects that the grant fund was targeted at. This approach could also harness greater awareness of D2N2 and your objectives and increased delivery through the VCS. The programme could replicate in many ways the previous Community Empowerment Fund Community Chest approach coupled with Community First panels and could also incorporate a specific innovation programme to encourage new products and services from local areas. Taking a focus on community economic development (a mixture of community engagement, community development and stuff that Local Alchemy used) would support the creation of legacy.

An outline of how this programme would appear is attached at appendix a. Again the Social Inclusion Advisory Group would be very interested in supporting this to be developed.

**7. Are there any programmes and activities that lend themselves to a particular geographic delivery focus, such as very local delivery, LEP-wide delivery or through collaboration with other LEPs?**

Clearly any CLLD or D2N2 bespoke approach will need to be delivered a district level in order to have any meaning. (see also answer to Q6 above)

A more localised approach across TO9 would also enable input from a wider range of agencies able to contribute to the development of social inclusion, this would improve the quality of the outcomes achieved and enable outcomes to be achieved more quickly.

LEP wide delivery could be problematic particularly in regard to TO9. There is not a well established track record of agencies in the D2N2 area working together to deliver programmes on a regular basis prior to the formation of D2N2. In order for the majority of agencies to work across the LEP area they will need to form new partnerships – the creation of any new partnership absorbs resources, at the moment the resources of almost all public sector and VCS agencies are under great pressure. Consequently it would be a better use of resources if programmes mirrored existing structures or structures in the process of being set up – such as the combined authorities.

Some activities are predominantly local in their focus – volunteering for example is characterised by people looking to bring about positive change in their neighbourhood rather than across a larger administrative area which people struggle to relate to.

The relationship between SCR and D2N2 needs resolving so it is clear to agencies based in those districts which are currently members of both LEPs where they should direct their energies. Expecting smaller agencies to keep abreast of developments within two LEPs is again a poor use of scarce resources.

**8. We wish to open as much of the programme for applications as early as possible. Will you be able to respond in this timescale? How could we improve the timing of the calls?**

It is essential that agencies have as much prior knowledge of the process (as well as the time frame) as possible. At this moment in time key questions remain unanswered about subcontracting,

consortia requirements and decision making processes and without an understanding of the full application process it is difficult to estimate how much time it will take to develop a bid.

It is probably timely for D2N2 to begin an open programme of outreach events around each thematic objective. This would at least allow for relationships across sectors to develop in advance of any calls for applications being made.

**9. How can we best ensure that the benefits of the programme are appropriately shared within D2N2?**

Commissioning principles and close adherence to cross cutting themes will be key. Use of the Social Value Act principles are essential to ensure maximum value of local investment is considered for the outset and in particular during the pre-commissioning phase and in the development of commissioning frameworks / calls. One East Midlands would be happy to provide training on how the act can be applied within the context of LEP activities.

In the Social Inclusion Framework it was clearly identified that local supply chains and locally supported solutions should be prioritised – this should apply across all thematic objectives to ensure maximum local benefit from the investments.

It remains important to retain flexibility within the programme. Key to this is not tying all investments into opt-ins as this restricts flexibility and the ability to align funds and themes into more holistic delivery models. It will also restrict the ability to tap into local match that could be sourced on a project by project basis.

Lastly, on the issue of match, one thing that has not been considered is the ability to use match more creatively to ensure greater impact and reach. Examples include the use of other match funding models (e.g. in-kind) or varying intervention rates to enable increase flexibility.

A good example of how this could work is to consider the SME competitiveness theme. There are a number of highly successful VCS and locally based SME support programmes in the existing ERDF programme that not only deliver advice and support but contribute to SROI and local economic flows. However, these niche projects are unlikely to have access to higher levels of match. Varying intervention rates slightly could make a huge difference.

For example, with a total value of £73m this investment could be split – if 90% of the investment utilised an intervention rate of 48 % across all mainstream delivery then the result would be an 80% intervention for the remaining activity – opening up a much wider delivery pool:

	Mainstream (90% of TO3)	Targeted (10%)
ERDF value	32.85m	3.65m
Match	35.58m	0.91m
Interv'n rate	48%	80%
Total	73m	

## **Appendix a:**

**Key Activity:** 16: The D2N2 Community Support and Innovation Programme  
**Thematic Objective:** 9: Promoting Social Inclusion and Combating Poverty

### **Strategic Rationale**

There are many small groups that support individuals, understand their needs, work in local communities to actively enable social inclusion and contribute to skills and employability outcomes. However, these groups operate at the micro-level with limited resources and are unable to deliver large programmes. This programme aims to recognise the role they can play and maximise the contribution that they can make to T08, T09 and T10, with a particular focus on inclusion.

This programme will create a grants fund with

- 80% for small grants of up to £15,000 per year to enable local community groups and micro-providers to deliver activities that contribute to this agenda
- 20% for larger grants of up to £50,000 per award to bring social innovation and drive system change.

The programme will ensure that very local communities benefit from inclusion – focussed support and will protect the intended inclusion outcomes expected from T09.

### **When and how procured**

Either through SFA opt-in or open call through DCLG. Match could well be available via the Derbyshire and Nottinghamshire Community Foundations and we would recommend that this be investigated at an early stage.

### **Overall Spend**

This programme would seek to meet the residual spend and targets currently unprogrammed under T09

## Appendix b:

### Consultees and Contributors

This response has been prepared by One East Midlands with contributions from:

Bassetlaw CVS	Community Action Derby
Nottingham CVS	Rural Action Derbyshire
Derbyshire Learning & Development Consortium	

The response is supported by members of the D2N2 Social Inclusion Advisory group

Additional contributions have been drawn from the following organisations

Sustrans	Conduit Services Plus
EMFEC	Nottinghamshire Clubs for Young People
Nimbus Disability Consultancy	The Renewal Trust
Derventio Housing Trust	Nonsuch Theatre
Derby College	Castle Cavendish
Sporting Futures	The Inspire & Achieve Foundation
Broadway	Transform Training Ltd
Foundation Derbyshire	Nottinghamshire Community Foundation
Nottingham Contemporary	NG7 Training, Employment & Advice
Derby College	Untapped Resource
ConnectMore Solutions	Nottingham Women's Centre
P3	IVJ
Twenty Twenty	Nottinghamshire Deaf Society
The Prince's Trust	Angel Consultancy
Babington Group	Base 51
Young Enterprise	Trident Reach
Financial Action & Advice Derbyshire	EVE Trades CIC
Framework Housing Association	Futures advice, skills and employment
Derbyshire Law Centre	Safe & Sound Derby
The Enthusiasm Trust	Nottingham Law Centre
Jobs Education & Training (JET)	PlayWorks
The Signpost to Polish Success	D2N2
Groundwork Greater Nottingham	Double Impact
East Midlands Environment Link	Enable
RCAN	Derbyshire Dales CVS
South Derbyshire CAB	Nottinghamshire Community Foundation
YMCA Derbyshire	