

Swyddfa Cyllid Ewropeaidd Cymru

Welsh European Funding Office

Cam Nesa Project

Business Plan

Version: Submitted 21 October 2016

Lead Beneficiary: Pembrokeshire County Council

WEFO Project Development Officer: Andrew Price

Version	Officer	Submission Date
1.0	Helen Ross	23 07 15
2.0	Helen Ross	21 10 2016

Cam Nesa Business Plan - Contents

Executive Summary.....	4
Section 1: Core Criterion – Strategic Fit.....	6
1. A Further Strategic Criterion: Cross-Cutting Themes.....	22
1. B Further Strategic Criterion: Suitability of Investment.....	31
Section 2: Core Criterion – Delivery	37
2. A Further Delivery Criterion: Indicators & Outcomes	59
2. B Further Delivery Criterion: Management of Operation.....	67
Section 3: Core Criterion – Financial & Compliance.....	78
3. A Further Financial Criterion: Value for Money.....	83
3. B Further Financial Criterion: Long Term Sustainability.....	86
Section 4: Annexes	
Annex 1: Financial Delivery Profile – TO FOLLOW	
Annex 2: Delivery Profile Indicators – TO FOLLOW	
Annex 3: Operation Logic Table (under former title Symud ‘Mlaen)	
Annex 4: Cross Cutting Themes – Monitoring Objectives	
Annex 5: Welsh Local Government Support for Training Scheme, State Aid reference SA.39576	
Annex 6: Cam Nesa Monitoring & Evaluation Plan	
Annex 7: Risk Register	

Annex 7 (a): Pembrokeshire County Council Risk Mapping Matrix

Annex 8: Distance Travelled Tool – **TO FOLLOW**

Annex 9: Corporate Management Team Report 14 October 2015

Annex 10: Cabinet Report 30 November 2015

Annex 11: Cam Nesa Job Descriptions - **TO FOLLOW**

Annex 12: Initial Operation Closure Plan

Annex 13: Cost-Benefit Analysis

Annex 13(a): Cost-Benefit Analysis Appendix 1

Annex 13(b): Cost-Benefit Analysis Appendix 2

Annex 14: Service Level Agreement – **TO FOLLOW**

Annex 15: Treasury Management Governance Arrangement for
2015/16

Annex 16: Beneficiaries Cost Breakdowns - **TO FOLLOW**

Executive Summary

Strategy

Cam Nesa is an operation under Specific Objective 1 (To reduce the number of NEET young people, among 16-24 year olds) of the 2014-2020 West Wales and the Valleys ESF Operational Programme. It will operate in the unitary authority areas of Ceredigion, Pembrokeshire, Carmarthenshire, Swansea and Neath Port Talbot by a consortium of beneficiaries comprising the local authorities and FE colleges. The lead beneficiary is Pembrokeshire County Council.

Considerable engagement has taken place across the region to be covered by Cam Nesa. This has involved engagement at a very early stage with the South West and Central Wales Regional Learning Partnership. The Regional Engagement Teams in southwest Wales and in mid Wales have been approached to obtain the endorsement of the Growing Mid Wales Board and the Swansea City Region Board.

Delivery

Cam Nesa will work with 2,000 young people who are judged to be NEET, over an initial three year period from 1st April 2017 to 31st March 2020, with a preceding 'Mobilisation' period 1st January to 31st March 2017. The primary objective is to be measured using the indicator "NEET Participants (16 – 24) gaining employment". We will also record the results - "NEET Participants (16 – 24) in education/training upon leaving" and "NEET Participants (16 – 24) gaining qualifications upon leaving". It is anticipated that the operation will assist at least 400 of these young people to gain employment with many gaining employment related qualifications and / or entering education/training.

The design of Cam Nesa interventions has been based on a process that saw the development of a long list of activities that might be capable of influencing whether young people became NEET or not, followed by appraisal and refining of this to create a short list of activities and then detailed consideration to use this to construct a suite of interventions considered most beneficial. Those developing Cam Nesa also sought to determine which of three delivery options was most appropriate. The three delivery options considered were to do nothing, to make use of a centralised delivery model or to adopt a mixed approach. Of these the latter was deemed most beneficial and appropriate.

The beneficiaries behind Cam Nesa comprise five local authorities, working closely with further education colleges. The local authorities are considered key beneficiaries because they are required to deliver statutory Youth Service provision to young people up to the age of 25 years. In addition local authorities have huge experience in delivering employment programmes. Further education colleges are considered necessary joint beneficiaries because they are strongly placed to deliver vocational post-16 course provision. The legal basis for their involvement is provided by Ministerial directions under Section 40 of the Learning and Skills (Wales) Measure 2009.

Pembrokeshire County Council has successfully delivered European funded schemes worth many millions of pounds. In the most recent EU funding programme Convergence 2007 – 2013, the County Council was responsible for delivering as a Lead Sponsor or Joint Sponsor or contractor in 78 EU funded projects. Amongst these are several targeting young people, such as Engage and the Gypsy Traveller Learning and Future Employment Project, (both Convergence ESF) and the Pembrokeshire Youth Guarantee (a pilot action funded by the European Commission in 2014/15). Cam Nesa has been heavily influenced by the successful Pembrokeshire Youth Guarantee. The operation includes innovative practices drawn from the Pembrokeshire Youth Guarantee that are now being applied across a much wider geographic area, over a longer period and with a larger number of young people.

Financial

Pembrokeshire County Council, Cam Nesas lead beneficiary, has been in existence since 1 April 1996.

The conduct of Pembrokeshire County Council and all the joint beneficiaries will be governed by the same Codes of Conduct used in the course of each organisation's normal business. Compliance with these Codes and action to correct any departures will be the responsibility of each beneficiary organisation using their own procedures and policies.

The budgeted total eligible costs for the operation are £5,714,286 (October 2016). The calculation of these costs makes use of Simplified Cost Options by joint beneficiaries, who will apply FR15.

Co-financing for the operation will be provided in cash from the beneficiary organisations. This will amount to £1,714,286. This will be drawn from beneficiary organisation's staff time and flat rates for indirect costs. The timing of match funding is therefore similar to that of expenditure on staff costs.

Following investigation, it has been determined that there are no other external sources of funding available to the beneficiaries that might reduce the request for ESF. Therefore the requested ESF is the lowest amount that would still permit the operation to proceed. The only other means of reducing the ESF request is to reduce the size of the operation. This has already been reduced to align with programme targets and to reduce it further would raise questions about the size of impact on the target group and the ratio of administrative to delivery costs.

Section 1 – Core Criterion: Strategic Fit

The specific evidence requirements needed for assessment against this criteria are as follows:

1.1 Clearly demonstrate an alignment with the targeting principles and specific objectives listed under the relevant EU Programme & Priority.

The Cam Nesa Operation will align with the targeting principles and Specific Objectives of the ***West Wales & the Valleys ESF (2014 – 2020) Priority Axis 3 – Youth Employment and Attainment***. It will specifically focus on ***Specific Objective 1: To reduce the number of 16 – 24 year young people who are NEET (Not in Employment, Education or Training)***.

Cam Nesa will provide a range of interventions which will complement and add value, but do not duplicate mainstream services managed by Engagement and Progression Co-ordinators (EPCs) in the delivery of the *Youth Engagement & Progression Framework (YEPF)* across the ERW Region, comprising the Local Authority areas of Carmarthenshire, Ceredigion, Neath Port Talbot, Pembrokeshire, Powys and Swansea. Powys will submit a parallel application comprising an East Wales Programme.

The Operation will:

- 1.1.1 Maximise the use of pre-existing multi-agency working to identify NEET young people as early as possible using the Careers Wales IO Database for 16-18 year olds and DWP referrals for 19-24 year olds (except those on the Work Programme).
- 1.1.2 Facilitate appropriate information exchange about identified NEET young people between education and other partners as set out in WASPI approved information sharing protocols.
- 1.1.3 Once referred onto the operation a lead worker will assess their specific support and provision needs.
- 1.1.4 The Lead Worker will engage early with the NEET young person and provide assistance in signposting and accessing re-engagement programmes and activities.
- 1.1.5 The Lead Worker will track and monitor progress against the plan which will be systematically reviewed.
- 1.1.7 Early engage identified participants within the Operation and provide assistance in signposting and accessing re-engagement programmes and activities.
- 1.1.8 Support participants in becoming re-engaged in education, employment or training by providing a broad range of opportunities appropriate to their needs, including access to targeted support (mentoring, coaching, counselling and advocacy where appropriate) to remove barriers to progression into employment and further learning, and to help create confidence and

independence in addition to learning- and work-readiness, including access to mainstream provision, such as WG Traineeships for 16-18 year olds and DWP Youth Contract interventions for 18-24 year olds;

- 1.1.9 Provide access to a range of opportunities (including work experience) to better equip the young people with a skill set that will allow them to be more flexible and adaptable in a fast changing labour market and to gain sustainable employment, encouraging linkages between career choices and longer term labour market trends and tackling traditional gender stereotypes in employment;
- 1.1.10 Support participants to access other supported job opportunities where appropriate, signposting to mainstream or other Intermediate Labour Market measures, such as, Jobs Growth Wales and WCVA Active Inclusion – Getting Ahead 2.

1.2 How the operation will:

Contribute towards delivering transformational change in at least one of the ten economic opportunities identified in the EPF;

1.2.1 The **Economic Prioritization Framework (EPF)** seeks to identify the broader economic activities taking place in the Welsh economy in order that all EU funding operations will act in support of strategic investments.

The Cam Nesa Operation in South West Wales will use ESF to provide work-focussed support and training to young people who need to be engaged in activities and training which will help guide them towards making decisions about their future career paths. These young people will ultimately be seeking to access the labour market across all of the industry sectors identified in the EPF, and many of their ancillary supply chain businesses – Energy, Food and Farming, Climate Change and Resource Efficiency, ICT and the Digital Economy, Advanced Manufacturing, Life Sciences and Health and Tourism, Recreation and Leisure.

1.2.2 How the operation will: Respond to the demand drivers described under the relevant economic opportunities in the EPF

The Operation will respond to many of the ‘demand drivers’ identified under the economic opportunities in the EPF, however, the impact of the project will not be direct as it is concerned with young people not yet in the workplace. The Cam Nesa Operation is more concerned to ensure that Wales has the widest possible workforce available to engage in these industry sectors by improving synergy between the [worlds of education and work](#). The Operation will invest in young people to try to secure their futures but in the longer term, the actions are aiming to ensure that Wales has a sustainable workforce for the next forty years.

Many of the investments which will be made through the ERDF funding programmes, and in the wider context across Wales which are highlighted in the EPF, identify shorter term job creation through the delivery of schemes but which result in longer term economic development. Relevant regional economic opportunities include (not exhaustive merely illustrations):

- Improving Connectivity – developments relevant to the area are planned for road, rail and ports in a number of areas including Swansea, Port Talbot, Port of Milford Haven / Pembroke Dock.
- Capital Investment across the area will include schools and FE / HE buildings, business parks, Swansea City Centre and many other mixed use developments which will include retail, leisure, residential also.

There are further opportunities for job creation at a local level in indigenous SMEs who are involved in the following industries. There may well be further supply chain jobs connected to these SMEs and possibly also Inward Investment opportunities:

- Site specific investment will cover developments across tourism, food and farming infrastructure and town centres.

Entrepreneurship work will be undertaken with groups of young people where appropriate. It is likely that this activity, coupled with investment in higher specification communications infrastructure which is becoming available across Wales, is a field where young people may be attracted to engage.

- Digital Connectivity – delivery of Superfast Broadband across the area is a key development.

Where some of the young people have been are NEET but are actually very capable academically, the EPF identifies many more opportunities for those

Life Science Developments in Swansea where a number of Higher Education projects are identified.

- Advanced Manufacturing Developments are planned in Swansea linked to the new Swansea University Campus and in the heart of the steel industry in Port Talbot the TWI Technology Centre.
- Energy Developments in Swansea - Swansea Tidal Lagoon and Pembrokeshire DeltaStream - Ramsey Sound Tidal Project.

1.2.3 How the operation will: Add value to and not duplicate the existing expertise and capability described under the relevant economic opportunities in the EPF

The project will operate at a local level within each of the five participating local authorities, dealing with young people who are NEET and will not cross over any of the significant areas of economic opportunity identified in the EPF. The value added that takes place will be through the provision of activities which Local Authorities who are locally leading on the YEPF cannot currently undertake to help those young people who are facing barriers to their progression.

1.3 Clearly demonstrate an alignment with the relevant Welsh Government policies.

Cam Nesa will align with, and support the implementation of a number of key relevant Welsh Government Policies across the ERW Region:

1.3.1 The Youth Engagement & Progression Framework¹

The Operation's key business driver is the YEPPF. It aligns with the Framework's Key Elements:

- **Early Identification** - Each Local Authority area has benefitted from the adoption of the Vulnerability Assessment Profile developed successfully by Swansea. Each LA has developed the VAP on a number of different software platforms. Each EPC manages the VAP caseload on a LA basis; Year 11 and 16-18 young people in schools that are at risk of disengagement (Tier 4) are identified using the VAP, and their details are shared with Careers Wales and incorporated into the IO Database. In addition, post-16 providers have their own EI systems in place and alert Careers Wales when the young person is at risk of dropping out of provision, and becoming NEET. Young people who are the most vulnerable to disengage will be supported by the ESF funded Cynnydd Operation in the SW Region.
- **Brokerage** - 16-18 year olds - Once the young person becomes NEET, their needs will be discussed through Careers Wales hosted monthly multiagency brokerage meetings held in each Local Authority area. In these meetings, the needs of the young person will be identified; should a referral to a Cam Nesa operation be deemed beneficial to the young person, then a named Lead Worker will be allocated, and a referral to the Operation will be made. For 18-24 year olds, DWP will make referrals into the Operation (except those on the Work Programme). The Cam Nesa opportunities will be delivered from a framework of procured organisations/providers and centrally-delivered services; these will constitute a "menu" of opportunities that might vary on a local basis.
- **Tracking Progress** - Lead Workers will measure distance travelled by the young person as they progress through the Operation. Progress will be shared routinely in the Multiagency NEET for a.
- **Provision** - Each EPC has undertaken a provision mapping exercise; this has exposed additional local needs that constitute the support and provision opportunities that comprise the Cam Nesa Operation. This process will be further discussed in section 2.1.2.3.
- **Employability** - This is the least developed strand in the region, matching the findings of recent Welsh Government commissioned research². Cam Nesa will offer additional targeted engagement opportunities and support packages to engage vulnerable young people and enable them to progress into employment. This will be further discussed in Section 2.

1.3.2 Programme for Government

¹ *Youth engagement and progression framework Implementation Plan*, Welsh Government 2013 ISBN 978 1 4734 0268 3

² *Formative Evaluation of the Youth Engagement & Progression Framework- Interim Findings*, Welsh Government Social Research Summary 107/2014.

In *the Programme for Government*, the Welsh Government articulates its commitment to taking action on the issue of young people who are NEET, saying in its Annual Report in 2012³ that:

“Reducing the number of young people who are, or are at risk of becoming NEET, remains a stubborn challenge and key priority. The damage that is caused for the prospects of young people who are NEET, as well as their own children, is well understood, as is the cost to the overall public purse”

Despite making progress to date in reducing the number of young people that were NEET, the *Programme for Government Summary Progress Report June 2014*⁴ concludes that:

“Too many of our young people are neither earning nor learning and this is a key social justice priority.”

Cam Nesa will directly support this key policy area as its primary objective is to reduce the number of NEETs aged 16-24.

1.3.3 Tackling Poverty Action Plan 2012-16⁵

See Section 1.4.3.

1.3.4 Youth Entrepreneurship Strategy⁶

The Cam Nesa Operation will support the *Youth Entrepreneurship Strategy* by boosting young people’s entrepreneurial confidence so that in future they can play a full and effective part in the economy and community. One in seven in the Welsh workforce is self-employed, and the aim of the Operation is to use this future pathway as a hook to re-engage them. Through targeted interventions, it will be:

1. Engaging: by promoting the value of entrepreneurship, increasing awareness of self-employment as a career option.
2. Empowering: by making NEET young people more aware of entrepreneurship through hands-on learning experiences of pathways into self-employment. It will connect with NEET young people to help them to realise their ambitions. The competition for employment has never been higher; by making participants become entrepreneurially aware and active, it is hoped that they will become more motivated in their education to succeed. Entrepreneurship is also a key component of the revised Essential and Employability Skills, and the new Welsh Baccalaureate qualification. Cam Nesa will offer additional support to enable disengaged young people succeed in these key curriculum areas. Cam Nesa will promote the development of Entrepreneurial skills for NEET young people aged 16-24 years by delivering enterprise-focused experiential activity.

³ *Programme for Government Annual Report 2012*. Welsh Government, May 2012.

⁴ *Programme for Government Summary Progress Report*. Welsh Government, June 2014.

⁵ *Tackling Poverty Action Plan 2012-2016*, Welsh Government 2012.

⁶ *Youth Entrepreneurship Strategy- An Action Plan for Wales 2010-15*, Welsh Government, 2010.

3. Equipping: Cam Nesa will prepare young people to take the next steps towards self employment. Cam Nesa will also collaborate with the Business Wales Young Entrepreneurship ERDF programme and other mainstream programmes to provide progression routeways for young people who require further support in their journey towards self-employment.

1.3.5 Policy Statement on Skills⁷

Skills have a major impact on both the economic and social well-being of Wales as a substantial policy area devolved to the Welsh Government. Together with policy action to support the employability of individuals, skills provide a strong lever for tackling poverty and strengthening the creation of jobs and growth. Skills development is a key focus area for reducing NEETs. Cam Nesa will support two broad areas linked to this policy:

1. *Literacy and Numeracy Skills*- so that young people have sufficient skill sets to enter the world of work or progress into further learning. Cam Nesa will offer targeted literacy and numeracy support to work with those that have not reached satisfactory attainment levels.

2. *Skills for Employment*- Cam Nesa will support young people to improve their Essential and Vocational Skills so that they are better placed to access work opportunities or progress into further education or training. The Operation will also provide work-focussed opportunities to raise awareness of the world of work, aspiration and motivation. Work focussed tasters will enable young people to trial individual career pathways and to raise awareness of necessary vocational skills development.

Cam Nesa will also provide Lead Workers to enable access to, and help sustain Work placements (including extended placements) to develop further understanding and experience of the world of work and essential and employability skills.

1.3.6 The National Youth Work Strategy for Wales 2014-2018⁸

The *Strategy* recognises the importance of the crucial role that Youth Work makes in supporting many young people to achieve their full potential. This work is traditionally done through informal and non-formal education approaches, but the *Strategy* identifies the need to strengthen the strategic relationship between youth work organisations and formal education to support positive outcomes for young people in mainstream education. The YEPF opens the way for the contribution of Youth Work organisations to be better connected with mainstream education and broader support services. One of the key implementations of the YEPF is the emergence of a network of 'lead workers' providing continuity of support and contact to vulnerable young people and supporting them to engage with and access wider support services.

⁷ *Policy Statement on Skills*. Welsh Government, 2014

⁸ *The National Youth Work Strategy for Wales 2014-2018*. Welsh Government, 2014.

Cam Nesa will provide additional funded opportunities to complement this support work in formal, non-formal and informal settings. It will also provide targeted opportunities to young people (funded through the Operation), but with statutory and voluntary youth sectors providing the “wrap around” support necessary for the vulnerable young people to succeed.

1.3.7 Well-Being of Future Generations (2015) Act

This operation is relevant within the context of the new Well-being of Future Generations (Wales) Act addressing several of the well-being goals that are contained within the Act. It is a collaborative operation which is concerned with getting young people into work and helping to lift them out of poverty, improve their long term outlook and health and life prospects. All of which will be carried out with full regard to sustainable development, supported by the operation’s Cross-cutting Theme Champion. The Cam Nesa helps to address the following goals:

A prosperous Wales - which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities;

A healthier Wales - in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood;

A more equal Wales - that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances);

Globally responsible - A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

1.3.8 Pembrokeshire County Council – Pembrokeshire Economic Development Strategy and Action Plan 2017 – 2022. (PACEC June 2016)

The importance of having an economic strategy to help improve the economic performance of Pembrokeshire sets the backdrop to deliver this key project which is aimed at helping to improve the availability of labour in the county.

The Cam Nesa operation can contribute to the following strategic objectives:

1. Improving Business Growth and the Enterprise Culture - ...”strengthen measures to train young people, while engaging more employers to provide increased support for training and education.”
2. Improving the Labour Supply and Skills – “Raise levels of attainment....and reduce barriers to work.”

1.4 Provide an outline of how the operation intends to contribute towards the Cross Cutting Themes (CCTs) of Equal Opportunities, Sustainable Development and Tackling Poverty. Cross cutting theme guidance and best practice factsheets can be found [here](#).

Specific Guidance for all three Cross Cutting Themes for the ESI Funds 2014 – 2020 Programmes has not yet been made available; however, this will be followed when published. Greater detail will be provided on the operation's contribution to CCTs in subsequent business plan stages.

1.4.1. Equal Opportunities

Cam Nesas activities will be open to targeted young people within the ERW Region, irrespective of race (including Gypsy Traveller young people), language, sex, sexual orientation, disability, age, religion or belief.

The main objective of the Operation is to help young people who are NEET to re-engage with education, training or employment through providing a range of interventions. Cam Nesa will provide a multi-agency approach to supporting participants, putting in place provision that is best placed to meet their needs. The delivery of the individual learning pathways will be supported and delivered by a range of Delivery partners who will have the expertise and experience to assist participants to overcome barriers to continued participation.

All participating local authorities have their own **Strategic Equality Plans 2012-16** and equal opportunities policies which all activities and communications associated with this project will adhere to. It will be a stipulation of the appointment of any third party bodies that they also adhere to this policy.

This programme will be developed in line with the priority specific guidance on equal opportunities, along with the key guidance document (including an emphasis on bilingual provision).

Participation in the Operation's activities will be monitored through the completion of registration documents by participants, which will be used to gain information regarding the individual's characteristics.

Welsh Language - All participating beneficiaries will have their own **Welsh Language** policies which all activities and communications associated with this project will adhere to. It will be a stipulation of the appointment of any third party bodies that they also adhere to this policy.

All provision and materials will be available bilingually, and accessibility issues will be taken into account at all times to ensure equal access to all.

1.4.2 Sustainable Development - One Wales: One Planet⁹

Welsh Government has a commitment to having sustainable development at its heart, with development that meets the needs of the present without compromising the ability of future generation to meet their own needs being central to this aim. Furthermore, it means enhancing the social, economic and environmental wellbeing of communities so that they create a better quality of life for their own and future generations. A real commitment to good education for all is the basis for a strong, prosperous and aspiring community.

All participating beneficiaries will have their own commitment to **Sustainable Development** which all activities and communications associated with this project will adhere to. It will be a stipulation of the appointment of any third party bodies that they also adhere to these policies.

Cam Nesa will address the policy's aim of inspiring and educating young people to develop their knowledge, values and skills so they can participate in decisions about what affects them, and live more sustainably. It will support vulnerable young people in the development of their Essential and Employability Skills, a key Welsh Government initiative to preparing young people to be better prepared for future learning, training or employment. This inevitably will have an impact on reducing the number of NEET young people in Wales and associated levels of poverty, making communities more sustainable and resilient. Cam Nesa will contribute to the integrated portfolio of programmes and regional and local levels that will help young people attain the skills necessary for their future employment opportunities. Cam Nesa will also complement existing Families First activities aimed at early identification and intervention, including young people living in poverty.

1.4.3 Tackling Poverty

The formulation of Cam Nesa has tackling poverty as a core aim. The development of the Business Plan has taken the following Welsh Government Guidance and best practice documents as necessary business drivers.

The operation aligns with the European Commission aim to reduce youth unemployment through the key actions of the Youth Employment Package (2012), the establishment of a Youth Guarantee by April 2013 and the Youth Employment Initiative (2013).

1.4.3.1 Tackling Poverty Action Plan 2012-16¹⁰

Cam Nesa will support the implementation of the Tackling Poverty Action Plan across the ERW Region. Employment, education and further training has a fundamental role in helping lift people out of poverty and in protecting those at risk of poverty and disadvantage. There is a strong link between poor educational attainment, low skills and poor health and wellbeing. Cam Nesa will provide a range

⁹ *One Wales: One Planet. The Sustainable Development Annual Report 2012-2013.* Welsh Government, 2013.

¹⁰ *Tackling Poverty Action Plan 2012-2016,* Welsh Government 2012.

of interventions which will complement and add value, but will not duplicate mainstream services aligned to the *Tackling Poverty Action Plan* in the following strategic areas as identified in the *Action Plan*:

Section 1: Preventing Poverty and making it less likely over the longer-term. Cam Nesa will offer additional targeted opportunities to raise aspirations; increase skill levels (including literacy and numeracy) and reduce inequalities in health and wellbeing. It will provide additional support to young people to help them overcome any barriers to their re-engagement with education, employment or training.

Section 2: Helping people to take up job opportunities and earn an income. The Action Plan recognises that the best route out of poverty is employment aligned with the development of skills and relevant qualifications. Cam Nesa will support the development of Essential and Employability Skills; it will also offer work-related opportunities, and supported work experience placements (a key route to social mobility) to raise aspiration and enable young people to gain confidence for them to enter into sustained employment. Cam Nesa will coordinate interventions to provide progression to job opportunities provided by mainstream or other ESF funded Intermediate Labour Markets, such as, Jobs Growth Wales 2.

Section 3: Action to mitigate the impact of poverty here and now. Cam Nesa will offer Financial Literacy to support young people become more independent with managing their own financial situation. Cam Nesa will offer Digital Literacy to enable young people to develop online skills to support their journey into work or further learning.

1.5 Detail any planned or potential opportunities for integration with other European Structural & Investment (ESI) funding programmes, such as ERDF, ESF, EAFRD (Rural Development) or EMFF (Fisheries Fund).

The project will liaise directly with several other projects that are planning to deliver ESF operations to the same cohort. This will include direct liaison (including working meetings) and information sharing with a number of other organisations who are progressing operations through the Business Planning process with WEFO. The aim of working together is to ensure that there is no duplication of delivery and that where possible processes and procedures are consistent. These are listed here:

Project Title	Lead Beneficiary	Target Participants	Contact taken place
Cam Nesa – East Wales	Powys County Council	NEET Young People	Working in parallel; Regular development meetings.
ADTRAC	Grwp Llandrillo Menai	NEET Young People	Several direct meetings, regular liaison planned.
INSPIRE 2 WORK	Blaenau Gwent CBC	NEET Young People	Several direct meetings, regular liaison planned.
Communities	WG –	NEET Young	There is close liaison with

4Work	Local Government & Communities	People who are disadvantaged and disengaged from mainstream services	C4W staff to avoid duplication in Communities First wards.
Active Youth Inclusion	WCVA	NEET young people with: <ul style="list-style-type: none"> • People with disabilities or work limiting health conditions (including substance or alcohol misuse) • Carers and people with caring responsibilities • People with low or no skills • People from jobless households • BAME people 	This project is live and there will need to be close liaison with staff to avoid duplication, although Cam Nesa will work to prepare young people for moving into the world of work and this project is going to provide paid work experience.
PACE	WG – Local Government & Communities	NEET Young Parents	No likely duplication with this very specific cohort. There will of course be signposting between the two projects as appropriate.
Together for a Healthy Working Wales	WG – Public Health Wales	NEET Young People with substance misuse and / or mental health issues	Very specific cohort. There will of course be signposting between the two projects as appropriate.
Traineeships	WG - SHELL	NEET Young People	Specific provision of vocational training for young people that are more work ready than those in Cam Nesa. Cam Nesa will offer wrap around Lead Worker support.
Jobs Growth Wales 2	WG - SHELL	NEET Young People	Specific provision of work experience for young people that are more work

			ready than those in Cam Nesa- the latter will contain wrap around Lead Worker support.
--	--	--	---

1.6 Detail any planned or potential integration with Financial Instruments or other EU funding streams such as the Interreg Cross Border, Transnational and Interregional programmes, or the Horizon 2020 or LIFE+ programmes. Further details on the other EU programmes available can be found [here](#).

There is no planned integration with other EU funded programmes and we do not foresee any potential for any development work in these programmes.

1.7 Detail any planned or potential transnational activity within the operation.

We do not plan any transnational activity under this operation.

1.8 Provide detailed evidence of engagement with all potential joint beneficiaries and stakeholders, including how this has helped shape the proposal. A list of all individual stakeholders contacted should be provided, along with evidence of the level of support (for example, via written correspondence). WEFO will reserve the right to contact any listed stakeholder directly.

The Operation has benefitted from intense collaborative planning **since October 2013**. This work was initially led by the ERW Region 14-19 Education Sub-Group, comprising 14-19 Lead Officers from each Local Authority area, and representatives from partner organisations. The 14-19 networks in each local authority comprise officers from Schools, FE, Work Based Learning, Youth Service, Careers Wales, Job Centre Plus, Third Sector, Communities First and Local Authority School Improvement services. In October 2013, the officers comprising the ERW Region 14-19 Education Sub-Group were:

Marcia Vale (Swansea)
 Matt Morden (Carmarthenshire)
 Freddy Greaves (Powys)
 Sian Davies (NPT)
 Elen James (Powys)
 Rob Hillier (Pembrokeshire)
 Simon Jenkins (Gower College Swansea)
 Del Thomas (Careers Wales)
 Gaynor Griffiths (RLP)

The ERW 14-19 Education Sub-Group meets monthly, and has had ESF project developments as a standing agenda item since October 2013. At the meeting on **10th October 2013**, each 14-19 co-ordinator was tasked with soliciting feedback from their respective networks.

On **14th November 2013**, the ERW 14-19 Education Sub-Group reconvened, with a focus on ESF project development. Present were:

Sian Davies NPT; Marcia Vale Swansea; Helen Morgan West Wales European Centre, Carmarthen; Mike Griffiths Youth Service, Powys; Sarah Berry European Officer, Pembrokeshire; Freddy Greaves Powys; Cath Morgan Pembrokeshire; Hefin Lloyd, SYO Carmarthenshire; Tina Grech Carmarthenshire; Rob Hillier Pembrokeshire; Ian James, Jane Whitmore and Sian Bingham Swansea.

The 14-19 Leads presented the needs of their respective networks. It was agreed that these would be compiled into a regional document by Rob Hillier and Marcia Vale, and this work was completed on **12th December 2013**. Regional needs were clustered into 5 work areas:

- Targeted support
- Alternative engagement activities
- Work focussed and work experience
- Flexible start pre-traineeship transition
- Youth Engagement & Progression Framework Co-ordination and Administration

On **7th January 2014**, this work was presented to the ERW Region 14-19 Education Sub-Group, including wider representation from FE Colleges in the region. In addition, feedback was solicited from the Engagement and Progression Co-ordinators in the region, who are currently:

Mike Pritchard (Ceredigion)
Fiona Rogers (Carmarthenshire)
Liz Dennis (Neath Port Talbot)
Rob Hillier (Pembrokeshire)
Freddy Greaves (Powys)
Jo-Anne Walsh (Swansea)

In **April 2014**, the RLP asked for Expressions of Interest (EOIs) from partners to articulate further work and priorities necessary to meet the needs of the embryonic Regional Delivery Plan for Employment & Skills Task, including the strategic fit to the ESF Priority 3 Youth Employment and Attainment; and the Swansea Bay City Region Strategic Aims (see Section 1.9). Pembrokeshire, as lead Local Authority for the region's Welsh Government education grants took the lead in developing the EOIs, which incorporated the previous work of the ERW 14-19 Education Sub-Group.

The multiagency Task and Finish Group comprised the following representatives:

James White (Pembrokeshire Local Authority, Chair)
Rob Hillier (Pembrokeshire Local Authority, 14-19)
Amanda Boyce (Futureworks - Employability and Skills Programmes, Pembrokeshire Local Authority)
Chris Birch (Pembrokeshire Local Authority, Adult Community Learning)

Sara Kenny (Job Centre Plus)
 Lesley Clark (Careers Wales)
 Sara Berry (SET Team, Pembrokeshire Local Authority)
 Lee Hind (PAVS)
 Gareth Bond (Pembrokeshire College)
 Sian Thompson (Pembrokeshire College/Local Authority)

Two EOIs were submitted to the RLP in **June 2014**, namely:

Cynnydd (Purpose to provide alternative activities (through the Medium of Welsh and EAL where appropriate) to engage 11 – 24 year old young people in learning and training to aid progression into subsequent employment. Young people will be aided in their access to provision (e.g. transport costs, ICT, equipment)

Symud ‘Mlan (now known as Cam Nesa; Purpose to target support to 16-24 year old young people to raise aspiration and to enable transition into skilled and highly skilled, high productivity employment and self-employment and to also target support for those who are disengaged and struggling).

Further collaboration and development of ideas from a wide variety of partner organisations took place in **September 2014** and **January 2015** (facilitated by the RLP) in thematic brokerage seminars;

As a result of the latter, Cynnydd and **Cam Nesa** emerged as the two regional operations to move forward to support the *Regional Young People’s Framework*, and were submitted to WEFO in **February 2015**.

The Operation has established a Project Development Group whose membership includes the following:

SWW ESF Youth Project Task & Finish Group - members

Rob Hillier	Pembrokeshire County Council
Gwyn Evans	Pembrokeshire County Council
Helen Ross	Pembrokeshire County Council
Catherine Morgan	Pembrokeshire County Council
Amanda Boyce	Pembrokeshire County Council
James White	Pembrokeshire County Council
Joni Hughes	Powys County Council
Freddy Greaves	Powys County Council
Marianne Evans	Powys County Council
Mike Griffiths	Powys County Council
Sian Pascoe	City & County of Swansea
Mike Jones	City & County of Swansea
Jan Jones	Neath Port Talbot
Susan Chilcott	Neath Port Talbot
Elizabeth Dennis	Neath Port Talbot

Elen James	Ceredigion County Council
Mike Pritchard	Ceredigion County Council
Gareth Rowlands	Ceredigion County Council
Tina Grech	Carms County Council
Matt Morden	Carms County Council
Hefin Lloyd	Carms County Council
Fiona Rogers	Carms County Council
Becky Jeremy	Powys County Council
Hannah Healy	City & County of Swansea
Sian Davies	Neath Port Talbot
Ruth Moore	
Kim Neyland	RLP
Gareth Bond	Pembrokeshire College
Simon Jenkins	Gower College Swansea
Clive Ball	NPTC Group
Jo-Ann Walsh	Careers Wales/Swansea EPC

The new Cam Nesa Working Group comprise members of staff from the following organisations: Pembrokeshire County Council, Pembrokeshire College, City & County of Swansea, Gower College, Swansea, Neath Port Talbot County Borough Council, the NPTC Group, Ceredigion County Council, Carmarthenshire County Council, Coleg Sir Gar, Powys County Council.

1.9 In addition to evidencing the contribution of the proposed operation towards the relevant regional opportunities identified in the EPF, the applicant should provide details of full engagement with all relevant regional and thematic groups or boards. As a minimum, WEFO would expect that the Swansea Bay and Cardiff City Region boards and the North Wales Economic Ambition board would be consulted and evidence provided as to how the proposed operation would add value to the existing and/or planned investments in the region. Similar evidence should be provided that your proposal aligns with all relevant regional and thematic strategies. Such evidence will not provide any guarantee of a funding award or progression to the next criterion assessment stage.

The **Regional Learning Partnership South West and Central Wales (RLP)** is facilitating the delivery of the Regional *Delivery Plan for Employment and Skills*¹¹. The plan is being developed in response to the Welsh Government's future strategic approach to the employment and skills agenda and to support the work of the Swansea Bay City Region and the Growing Mid Wales Partnership. The plan's objective is to enable the provision of skills and learning to meet the needs of the region's economic and labour market over the next ten years and beyond. The plan has been developed under the guidance of the RLP Strategy Group, supported by the RLP Steering Group and the Regional Delivery Plan for Employment & Skills Task & Finish Group. A Strategic Employer Reference Group (SERG) has also been ~~established in order to~~ strengthen the link with regional employers and is chaired by

¹¹ *Regional Delivery Plan for Employment and Skills for South West and Central Wales 2014-2020*.
Regional Learning Partnership, Fourth Version- March 2015.

a board member of the Swansea Bay City Region. The SERG, led by regional employers, will review, challenge, influence and inform the ongoing development of the plan. The RLP is represented by Strategy Group Members on both the Swansea Bay City Region Board and the Growing Mid Wales Partnership.

Cam Nesa will support the implementation of the *Regional Delivery Plan for Employment and Skills* in the following Priority Areas:

- Increasing the proportion of the workforce with higher level skills;
- Ensuring future skills supply is flexible and responsive to the growth sectors identified in the economic data;
- Addressing the low skills deficit evident in the attainment of qualifications, in particular those without formal qualifications;
- Developing the entrepreneurial culture;
- Increasing overall employment levels and addressing economic inactivity;

Cam Nesa has engaged with the RLP at a number of levels during its formative stages. This engagement has included:

- The presence of RLP staff at ERW Region 14-19 Co-ordinator meetings specific to ESF Operation developments over the last two years;
- The submission of two “Expressions of Interest” (EOIs) to the RLP in June 2014 which detailed the vision of additional skills and activities required across the region to address it’s skills needs, and additional provision required by young people; these were the embryonic documents that led directly to the completion of the Cynnydd and Cam Nesa (SO1 Operation) Operation Logic Tables.
- Further collaboration and development of ideas from a wide variety of partner organisations took place in September 2014 and January 2015 (facilitated by the RLP) in thematic brokerage seminars;
- As a result of the latter, Cynnydd and Cam Nesa emerged as the two regional operations to move forward to support the *Regional Young People’s Framework*;
- On 25th March 2015, following review by the RLP, written feedback was provided to WEFO to advise that ‘Cam Nesa has the support of the RLP and there is a strategic fit with the Regional Delivery Plan. Comments provided to WEFO were as follows:-
 - *There is a strategic fit with the Regional Delivery Plan and organisations have engaged with the RLP.*
 - *Needs to demonstrate links to core JCP 18-24 services and engagement with wider stakeholders, currently education focused.*
- ERW is also represented at the Regional Delivery Plan for Employment & Skills Task & Finish Group.

The Cam Nesa Operation has been developed mainly under the auspices of the ERW Region 14-19 Sub-group (Section 1.8). Both Cynnydd and Cam Nesa were scrutinised by the ERW Region Managing Director, and Directors of Education on 13th February 2015. The Directors of Education in each Local Authority area

subsequently formally approved the projects to move to Business Planning stage in early April 2015.

1.10 The potential for any displacement of the private sector through the activities to be funded must be highlighted and described.

There is no potential for any displacement of the private sector through the activities to be funded through the Cam Nesa Project. It will, however be necessary to engage with a variety of providers from all sectors. Where the provision required to overcome a young person's individual needs, might best be delivered by a private, third or another public sector body then it will be possible to facilitate this **via procured provision**. The intention is to hold an open competition to identify providers who will be able to deliver discrete interventions when required. This will ensure that the widest possible selection of support and activities are made available to the young people who are currently NEET to enable them to progress into employment.

Section 1A: Further Strategic Criterion

Cross Cutting Themes

1A.1 Describe in detail how the operation will fulfil its statutory obligations under all legislation relating to the CCTs.

Describe in detail how the operation will align with and support all relevant policies and strategies relating to the CCTs.

Describe in detail how the operation will maximise its potential to contribute towards the CCTs objectives, indicators and associated targets.

Provide detailed and specific evidence of how any indicators that will contribute towards the CCT objectives will be delivered, when and by whom. A specific staff member will need to be identified as being responsible for the implementation and monitoring of the CCTs. This information should be cross-referenced with the general indicator information provided under the 'Indicators & Outcomes' criterion.

1A.1 Equal Opportunities

1A.1.1 Legislative Context

As required by the Public Sector Equality Duty of the Equality Act 2010, Pembrokeshire County Council (Lead Beneficiary) along with all other local authority and colleges of further education (joint beneficiaries) involved in the delivery of this operation, have produced individual Strategic Equality Plans. This demonstrates the organisations' continuing commitment to meeting their legal obligations to eliminate discrimination. These plans help to reinforce our undertaking to advance equality of opportunity. The beneficiaries will ensure, through the delivery of this operation that all individuals have equal access to services, in order to enhance their chances of gaining better opportunities, when it is time to engage in the world of work. In respect of this operation, Pembrokeshire County Council's Strategic Equality Plan includes commitments to the following Equal Opportunities aims which align with the EO aims of the Programme:

- Advance equality of opportunity for younger people for skills and jobs;
- Advance equality of opportunity for disabled people;
- Advance equality of opportunity for members of our community who are from an ethnic minority.

The Pembrokeshire County Council Strategic Equality Plan 2012 – 2016 may be found at <http://www.pembrokeshire.gov.uk/content.asp?nav=101,1581,1859>.

For details of Joint Beneficiaries Strategic Equality Plans - ***these have previously submitted onto WEFO Online please see CASE ID 80833 Cynnydd Operation - CCT References Matrix Annex 24.***

In addition, Pembrokeshire County Council and all joint beneficiaries have individual Equal Opportunities Statements or Policies in place. The aim of these policies is to ensure fair and equal treatment and opportunity for all users of the Council's services and Council employees.

Pembrokeshire County Council's Equal Opportunities Statement may be found at: http://www.pembrokeshire.gov.uk/content.asp?nav=973,2099&parent_directory_id=646

For details of Joint Beneficiaries Equal Opportunities Statements ***these have previously submitted onto WEFO Online please see CASE ID 80833 Cynnydd Operation - CCT References Matrix Annex 24.***

Pembrokeshire County Council operates a Welsh Language Scheme prepared under the Welsh Language Act 1993. This has adopted the principle that in the conduct of public business and the administration of justice in Wales, it will treat the English and Welsh Languages on a basis of equality. All joint beneficiaries also operate Welsh Language Schemes required by as public sector bodies providing services in Wales. In keeping with the ethos of Welsh Government aspirations to encourage the use of the Welsh language to flourish, this operation will use Structural Funds to provide services to young people in Welsh and will ensure that activities are promoted as being available in Welsh. All literature will be available bilingually.

Pembrokeshire County Council's Welsh Language Scheme may be found at <http://www.pembrokeshire.gov.uk/content.asp?nav=101,1581,1859&id=5271&language=>

For details of Joint Beneficiaries Welsh Language Schemes ***these have previously submitted onto WEFO Online please see CASE ID 80833 Cynnydd Operation - CCT References Matrix Annex 24.***

1A.1.2 Addressing the Cross Cutting Theme Matrix – ESF 2014 – 2020:

This operation addresses three of the ESF Programme objectives for equal opportunities and gender mainstreaming, these are to:

- *Reduce the numbers of young people not in education, employment or training (NEET)*

This project will work directly with NEET young people to help them to take steps towards entering further learning or the labour market.

- *Reduce over-representation of certain ethnic groups, care leavers and disabled young people among those who are NEET;*

- *Recognise health and wellbeing as one of the cornerstones of a healthy, vibrant economy.*
- *Challenge traditional employment roles where gender stereotypes may exist and assist young people, both males and females, to take up and retain employment in non-traditional areas or industries where specific genders are underrepresented, such as females in industries where STEM subjects are required (e.g. Engineering, Information Technology).*

The Cam Nesa Operation will only work with those young people who are NEET, to help re-engage them in learning or career choices which will make the most of their potential in the future.

- *Support access for disabled people and people from BME backgrounds to training and employment opportunities.*

As will be seen below under Cam Nesa Equal Opportunities Objectives, every effort will be made to include young people from all BME backgrounds and of all abilities.

- *Challenge traditional employment roles where gender stereotypes may exist, and assist young people, both males and females, to take up and retain employment in non-traditional areas or industries where specific genders are under-represented, such as females in industries where STEM subjects are required.*

The Quality & Monitoring Officer who will undertake the role of Equal Opportunities Champion (see description below) will work with joint beneficiaries to ensure that those workers engaging directly with the participants, are aware of this objective and disseminate the importance of this message across the operation.

- *Identify and support opportunities to promote and facilitate the use of the Welsh language and support speakers of the language.*

The Cam Nesa Equal Opportunities Champion (see description below) will work with joint beneficiaries to ensure that opportunities to promote the use of the Welsh language are supported wherever possible.

Procured delivers will be asked to explain their approach to contributing to all cross cutting themes. Evidence of policies regarding Environmental / Sustainable Development, Equal Opportunities and Welsh Language will be requested.

Further, the operation indirectly addresses a further two equal opportunities Programme ESF objectives:

- *Provide targeted support to employers to employ disadvantaged individuals*

There will be action to provide support to employers who have been able to offer work placements to the target group, which includes many young people

disadvantaged due to a variety of factors such as – ability, health (including mental health), poverty. This will help employers to gain a broader understanding of the pool of young people available to work with them. The support will vary but may include – help with risk assessments, equipment, visits and frequent phone calls to identify and help resolve any issues which may arise.

Employers will need to create an environment which supports an inclusive work place and promotes equality of opportunity for staff.

Delivery will be available irrespective of where a young person lives in the area and any issues that they may be facing. Equally, access to delivery will be open to all young people in respect of all of the remaining eight protected characteristics – disability, gender, sexual orientation, race, religion, gender reassignment, marital status or pregnancy. In addition consideration is given to language – see Welsh Language section above and in Equal Opportunities objectives described below.

These young people may face multiple disadvantages be they health, social or behaviour related. Whatever the disadvantage that they face, a multi-agency panel will consider the needs of each participant, in order to determine which strand of provision is best suited to that young person.

1A.1.3 Cam Nesa Operation - Equal Opportunities Objectives

a. Equal Opportunities Champion

The European Contract Management Team (ECMT) will a member of the team to oversee the delivery of Cross Cutting Themes objectives, act as EO Champion and liaise with all joint beneficiaries on these matters. All other joint beneficiaries will similarly be asked to nominate an EO Champion who will act in support of the Lead EO Champion to advise, encourage and provide peer reviews of the EO aspects of the operation and its delivery.

b. Welsh Language Provision

All of the materials relating to the Cam Nesa operation will be available bilingually in English and Welsh, as well as any publicity and press information. Where any request is made to receive provision in Welsh this will be accommodated.

c. Black and Ethnic Minority Young People

Young people in need of support from all backgrounds and ethnicities will be encouraged to participate in the Cam Nesa provision and if necessary depending on demand, every consideration will be given to providing materials in other languages, if engaging with young people from BME communities.

d. Young People with Disabilities

Young people of all abilities will be encouraged to participate in the Cam Nesa provision. Support will be offered to any employer offering work experience placements, in order to remove a perception or physical barrier which may prevent a young person participating in the labour market, or training opportunities.

1A.2 Sustainable Development

1A.2.1 Legislative Context

As all member states operating EU funding programmes will be aware, these programmes are operating under the European Union's ten-year growth strategy Europe 2020. This aims to address the economic shortcomings of the EU with a key driver being creating conditions for growth in a sustainable manner. To that end there is an emphasis on:

- Resource efficiency
- A greener economy
- Lower carbon emissions
- Environmental protection
- Developing green technologies
- And smarter electricity grids
- Improving the business environment.

Whilst some of these aims will be tackled by other operations in the 2014 – 2020 funding programmes, especially using ERDF for larger scale infrastructure operations, it is important for small steps to be taken at all times by all beneficiaries. The Cam Nesa operation will address this through the objectives in section 1A 2.3 below.

In addition as public authorities all joint beneficiaries are governed by UK Environmental Legislation which will be adhered to where appropriate through the delivery of the Cam Nesa operation. This includes:

- Climate Change Act 2008;
- Natural Environment and Rural Communities Act 2006;
- Clean Neighbourhoods and Environment Act 2005;
- Countryside and Rights of Way Act 2000;
- Wildlife and Countryside (Amendment) Act 1991;
- Environmental Protection Act 1990;
- Control of Pollution Act 1974;
- The Conservation of Habitats and Species (Amendment) Regulations 2011;
- The Waste (England and Wales) Regulations 2011;
- The Environmental Permitting (England and Wales) Regulations 2010.

In Wales specifically, the Wellbeing of Future Generations Act (Wales) 2015 has come into place, and applies to all Welsh local authorities. In tandem the Welsh Government is encouraging organisations across all sectors to sign up to the Sustainable Development Charter which some of our joint beneficiaries have already done (Pembrokeshire College, Carmarthenshire County Council, Neath Port Talbot County Borough Council, City & County of Swansea Council, Gower College Swansea and Neath Port Talbot Group of Colleges). Pembrokeshire County Council officers responsible for Sustainable Development are preparing the case for signing up. Welsh Government intends to use the Sustainable Development Charter to encourage and enable organisations in Wales to become more sustainable.

For a copy of the Pembrokeshire County Council's Sustainable Development Policy, those of Joint Beneficiaries and those beneficiaries signed up to the Sustainable Development Charter ***these have previously submitted onto WEFO Online, please see CASE ID 80833 Cynnydd Operation.***

1A.2.2 Addressing the Cross Cutting Theme Matrix – ESF 2014 – 2020:

This operation addresses all of the ESF Programme objectives for Sustainable Development. These are to:

- *Promote environmental awareness and good practice in the implementation of activity;*

All participants will be made aware of the WEFO Eco Code and encouraged to follow its advice across the seven areas where action can be taken.

- *Integrate sustainable development into operations undertaking awareness raising education and training programmes;*

Liaison through the SD Champion will take place with advisors / organisations to understand the most effective methods of incorporating sustainable development into the Cam Nesa operation. This will be the responsibility of the Quality & Monitoring Officer and will form part of the advice to joint beneficiaries on incorporating awareness raising of environmental issues.

- *Support participating contractors and employers to adopt or improve Environmental Sustainability Strategies;*

Procured delivers will be asked to explain their approach to contributing to all cross cutting themes. Evidence of policies regarding Environmental / Sustainable Development, Equal Opportunities and Welsh Language will be requested.

- *Promote social justice and equality of opportunity*

Delivery of Cam Nesa will be open to all eligible beneficiaries without discrimination, in line with all statutory responsibilities and operation commitments to equal opportunities.

- *Recognise and promote health and wellbeing as one of the cornerstones of a healthy, vibrant economy.*

The Quality & Monitoring Officer will work with Cam Nesa staff and contracted deliverers to include health and well-being messages in sessions delivered to participants.

1A.2.3 Cam Nesa Operation - Sustainable Development Objectives

a. Sustainable Development Champion

The European Contract Management Team (ECMT) will include an Officer whose responsibility is to oversee the delivery of Cross Cutting Themes objectives, act as SD Champion and liaise with all joint beneficiaries on these matters. The SD Champion will share examples of good environmental practice including visual aids (posters etc.) of messages which help everyone, including young people to understand, and promote, environmental awareness. Each joint beneficiary will seek to nominate an SD Champion who will help to advise, encourage and provide peer reviews of the SD aspects of the operation and its delivery. It is important that all stake-holders in the operation and the general public, understand the importance of looking after the environment both at work and at home.

b. Eco Code

The Sustainable Development Champion will disseminate the WEFO Eco Code (Contained in the WEFO Cross Cutting Theme Matrix 2014 - 2020) to all joint beneficiaries and work with them to ensure that all staff, employers and participants are aware of it and the messages contained in it about saving resources.

c. Sustainable Development Charter

Several joint beneficiaries (see above) have already signed up to this and Pembrokeshire County Council will be actively seeking to become a signatory during the delivery of this operation. It will be brought to the attention of other joint beneficiaries not already signatories.

d. Awareness Raising

Opportunities will be made available for young people to learn more about the employment opportunities available in the environmental sector of the economy.

e. Work experience

It is vital that young people develop an awareness of this growing sector in the economy. Every effort will be made to ensure work tasters and work experience placements are made available in the environmental sector. These may be in the private sector and there are also many social enterprises and CICs (Community Interest Companies) who may be able to offer work placements.

f. Environmental Advice

The SD Champion will work with the Wales Green Business Centre and Natural Resources Wales and other organisations as appropriate, to obtain advice and guidance in sharing and implementing the 'green agenda' across the operation. These bodies have expertise in demonstrating commitment to environmental issues in a world increasingly challenged by resource depletion and climate change and also offering environmental solutions to help reduce consumption, to improve sustainability. This will include reminders to all beneficiaries that every effort must be made to contribute to the minimizing the use of resources – for example: wherever possible the most environmentally friendly methods of travel to meetings etc. should be used and if at all possible video-conferencing should be used to avoid travel, consumables should be used carefully, and all should maximise use of ICT for greatest efficiency – to save time and resources.

1A.3 Tackling Poverty

1A 3.1 Legislative Context

The European Union has a target for 2020 under its Europe 2020 Strategy, which is to see 20 million fewer people in poverty by increasing economic growth and creating jobs. Under this Europe wide objective Welsh Government has published The Tackling Poverty Action Plan (TPAP). The Cam Nesa operation is primarily concerned with reducing the likelihood of young people becoming unemployed and therefore remaining in poverty and will specifically work with those who are at greatest risk of not being able to find employment, by overcoming their individual barriers.

1A.3.2 Addressing the Cross Cutting Theme Matrix – ESF 2014 – 2020:

This operation indirectly addresses all of the Tackling Poverty ESF Programme objectives these are to:

- *The creation of jobs and growth providing employment opportunities for those who are out of work*

The operation will work with young people who need help and guidance in making training and career choices in order to help move them closer to employment. This

will include opportunities to develop greater understanding of the workplace through taster sessions and work placements.

- *Tackling barriers to employment such as poor skills, lack of childcare or limited transport options, helping more people to access employment opportunities*

As part of Cam Nesa delivery a needs analysis for every participant identified will be undertaken. A lead worker will be allocated to manage the young person's needs / plan, the lead worker will also track and monitor the participant's progress. This will take place through professional dialogue with appropriate agencies and the young person themselves on a regular basis.

1A.3.3 Cam Nesa Operation - Tackling Poverty Objectives

a. Tackling Poverty Champion

The European Contract Management Team (ECMT) will include an officer whose responsibility is to oversee the delivery of Cross Cutting Themes objectives, act as TP Champion and liaise with all joint beneficiaries on these matters.

Given the importance of digital inclusion in the 21st century, we will be able to monitor the following as a measure of helping participants to be more prepared for today's world of work, where so many industry sectors are reliant on employees being IT literate.

b. IT Literacy

An assessment of each learner's IT Literacy will be made and, where this is a weakness, we will include provision for additional learning in IT skills, so essential in today's work place.

c. IT work tasters / Work experience placements

We are planning to offer work tasters and work experience placements and will make every effort to secure IT opportunities, especially for those young people for whom this is of particular interest.

d. Employer Engagement

We shall work with employers to identify work placement opportunities. This will help us to allow participants to secure much more of an insight into the requirements of different industry sectors and job roles.

e. Participants who have no / very low qualifications.

This is likely to be typical of the majority of our participants and will therefore be a key trigger for participation in the Cam Nesa operation. The outcome required by the programme is to get the young person into employment but depending on the needs

of the employer and the gaps in the young persons skills / qualifications it will be necessary to deliver some qualifications to get them 'job ready'.

For information regarding Cross Cutting Theme monitoring data to be collected, see Cross Cutting Theme Monitoring Objectives Annex 4.

Section 1B: Further Strategic Criterion

Suitability of Investment

1B.1 The need for the operation, in terms of:

1B.1.1 Define the target participants;

All participants will meet WEFO general criteria for the eligibility of participants. They will have the legal right to live in the United Kingdom during the period of ESF support, and also have the legal right to work in an EU Member State, including compliance with applicable UK registration, permit or visa rules.

Cam Nesa participants will be eligible for support through the West Wales and the Valleys ESF programme, meeting WEFO's general required geographic criteria (participants must live, work or study in the programme area).

Operation specific rules also apply. Cam Nesa participants must not be working. They must be living in the unitary authority areas of Ceredigion, Pembrokeshire, Carmarthenshire, Swansea or Neath Port Talbot.

They will be young people aged 16 to 24 who are identified as NEET. They are to be individually identified by professionals experienced in working with young people mainly (but not exclusively) through Careers Wales or Job Centre Plus.

An individual who has been enrolled as a participant on any other ESF operation will not be regarded as meeting the criterion of being NEET and will therefore not be considered for recruitment as a Cam Nesa participant.

1B.1.2 Define the barriers facing the identified participants;

These are set out in the approved Operation Logic Table, which is attached at Annex 3. However, to recap we have identified the following barriers facing young people aged 16 to 24 who may have disengaged from Education. The barriers explain the possible reason(s) for their disengagement:

- Lack of aspiration and appropriate role models
- Cultural barriers promoting disengagement (for instance in the Gypsy and Traveller community)
- Low self-esteem
- Mental and developmental health issues
- Substance misuse
- Language barriers (including Welsh as a first language)
- Lack of home support
- Effect of poverty forces disengagement with learning (e.g. lack of access to IT)

- Inappropriate/biased/partial information and advice to the target group
- Rurality
- Low basic skills
- Lack of appropriate curricular options in formal, informal and non-formal settings.

1B.1.3 Explain how the operation will overcome these barriers and ultimately benefit the identified participants;

The project will provide multi-agency working to identify vulnerable young people as early as possible using the Careers Wales IO Database for Post-16 learners and JCP referrals (18-24 year olds). A Lead Worker will be assigned to manage the Young Person's plan and relevant support and appropriate provision/activities will be put in place. The Lead Worker will track and monitor progress against the plan which will be systematically reviewed.

Strand 1- Pre-engagement Activities

For participants that have significant and potentially multiple personal and social barriers that prevent them from progressing straight into employment or further training, a bespoke programme of mentoring and support will be offered up to a maximum of 3 months. This might involve confidence and self-esteem raising activities, support in managing housing, transport, relationship and financial matters, and issues resulting from physical disabilities or Additional Learning Needs e.g. autistic spectrum disorder.

Strand 2- Pre-employment Skills and Qualifications

For participants with low levels of basic skills and qualifications, a variety of up-skilling opportunities and qualifications will be offered to enable them to progress into employment, including communication, literacy, numeracy, digital literacy, and employment specific qualifications (e.g. Health & Safety, CSCS, Food Hygiene). Entrepreneurship skills raising activities will be offered to those interested in self-employment.

Strand 3- Employability & Work Experience

Participants that are closer to progressing into employment will be supported to:

- raise their awareness of the local labour market,
- better understand the requirements of vocational sectors, including pathways into self-employment
- manage their expectations in terms of sustainable employment
- become job ready by preparing a CV and having mock interviews
- undertake job searches
- appreciate the importance of engaging in work experience.

Strand 4- Enterprise and Self-employment

Participants with an interest in self-employment will be supported to:

- develop entrepreneurial skills and aspiration
- raise awareness of entrepreneurial opportunities

- engage with targeted entrepreneurial experiences including links with employers
- create and grow their own business idea
- develop their Business Plan and be signposted to other business support programmes

1B.1.4 Demonstrate that these activities are not provided by existing or planned public or third sector support.

There exists and is planned public sector support for NEET young people. The problem lies in the fact that there is a large mismatch between the provision available and the extent of the need facing local authorities and FE colleges. Cam Nesa is intended to supplement the support already available, as well as to bring in best practice to improve the efficiency and effectiveness of that support. Cam Nesa will not replace or duplicate current provision.

To be specific, the ESF will allow local authorities and FE colleges to carry out the following activities that could not otherwise be delivered:

- Provision of support and engagement (described in detail at section 1B.1.3 above)
- specialist provision, often with high staff / participant ratios, to specifically address the needs of participants;
- Extensive monitoring and evaluation.

1B.2 Please outline in detail the potential of the proposed operation to duplicate activity currently being undertaken by the private sector.

We have not identified any likelihood of displacement of existing private sector activity. As this holistic support cannot easily be offered by one organisation, where specialist services are needed in small numbers, for example, Social, emotional and well-being counselling, this will be procured as required.

1B.3 Where the potential for duplication of private sector activity exists, please analyse in detail the potential of the proposed operation to displace the private sector. If displacement is deemed likely, please describe the reasons for this.

Activity is expected to be delivered in-house either by local authorities or by FE colleges. Some activity may be procured, it is not expected that this will form a large part of the services delivered. The precise mix of in-house and procured activity will differ in each geographic area dependent on the expertise, capability and capacity of the joint sponsors in that area, and on the perceived need for a particular service. The services to be procured in each geographic area will be determined locally and procured following each joint beneficiary's procurement rules.

Both local authorities and FE colleges have available to them State Aid cover so that in the event that this in-house activity be deemed to be “economic” in nature, distortion of the market either does not exist or will be within acceptable limits.

Local Authorities will make use of the “Welsh Local Government Support for Training Scheme”, State Aid reference SA.39576 (see Annex 5). This permits aid to be given by any of the Cam Nesa beneficiaries that are local authorities to enterprises for the training of anyone who is a “disadvantaged worker”, the definition of which includes anyone aged between 15 and 24. This would cover the provision of ESF received and conveyed to FE Colleges, if that were to be considered State Aid. However the Scheme also includes at Schedule 1 a list of activities that are not considered to be State Aid by the European Commission. Schedule 1 includes all those elements of Cam Nesa activity that a local authority beneficiary might deliver in-house, namely:

- General education up to and including higher education;
- Initial training schemes such as modern apprenticeships and day release schemes.

FE Colleges will make use of the derogation provided to them in WEFO Delivery Model’s Guidance (version 1, March 2015) Annex E Scenario 3. This allows them to deliver directly where there is evidence that to do so is (a) pursuant or supplemental to their core activities, (b) that it represents value for money use of public funds and (c) the activity in question is non-economic in nature. It is argued that condition (a) is satisfied in that the Cam Nesa activity will be supplemental to their core activities because it will constitute additional provision made available to an individual identified as NEET. This might, in a simple case, be additional numeracy support. We argue that condition (b) is satisfied as demonstrated in Section 3A of this Business Plan. Finally we argue that condition (c) is satisfied because the type of support to be provided will fall into one of the categories of activity deemed by the European Commission not to be State Aid as set out in Schedule 1 of SA.39576 referenced above.

1B.4 To support the above, you will need to make reference to relevant research or consultations that have identified the need for the operation and or the demand for its activities.

Pembrokeshire County Council and its joint beneficiaries have significant experience in working with this target group and they have drawn on this in developing this Business Plan. We have previously made use of EU funds to enhance the prospects of this target group. Of particular relevance are the Engage project funded through the Convergence ESF programme 2007-13 and the Pembrokeshire Youth Guarantee. Evaluations of the Engage project may be found on the website below:

- Engage project:
<http://gov.wales/docs/wefo/publications/evaluation/130211engageevaluationfinale.n.pdf>

The evaluation of the Pembrokeshire Youth Guarantee (Preparatory Action on the Youth Guarantee, Directorate General for Employment, Social Affairs and Inclusion, European Commission Application Reference: VP/2012/012/0418) **has previously submitted onto WEFO Online please see CASE ID 80833 Cynnydd Operation.**

The lessons learnt from these previous projects are set out in detail in the Monitoring and Evaluation Plan at Annex 6. These lessons relate to various aspects, including project mobilisation, monitoring, networking of delivery staff, staff experience and expertise, and budgeting. Engage was especially informative regarding the design of administrative and management systems. However the most important of these projects in terms of influencing the design of the interventions for Cam Nesa is the Pembrokeshire Youth Guarantee Pilot and in particular Strand C of that pilot.

It needs to be understood that this Pilot and Cam Nesa are not precisely comparable. The proposal for a Pilot of the Youth Guarantee submitted to and selected by the European Commission was for the provision of a Youth Guarantee Gateway for 15 to 25 year olds in Pembrokeshire. Strand A dealt with 15 to 17 year olds in school provision; Strand B of the Pilot dealt with 16 to 17 year old NEETs and Strand C: 18 to 25 year old NEETs.

The project offered young people the following interventions delivered through a mixed economy of centrally delivered and procured activities:

- Personalised individual mentoring of young people
- 'Bite-sized' vocational tasters
- Development of personal and social skills
- Activities to better understand the world of work in the context of the local labour market
- Employability skills
- Digital capability and on-line recruitment
- Work tasters, placements and clubs
- Job broking
- Employer events, visits and presentations
- Links to business and industry
- Career planning and progression
- Entrepreneurship and enterprise
- Money matters – financial independence
- Introduction to training and learning options

- Links to vocational learning, apprenticeships and mainstream employment programmes that support the journey into work
- Issue based work.

Activities were brokered by through multi-agency working, with delivery of a mixture of short duration, timely interventions linked to young people's needs.

A key success of the Pilot was the offer of a variety of support and engagement activities to the vulnerable young person, which were centrally brokered. The involvement of employer engagement, and personalised information advice and guidance is supported by a variety of published sources^{12,13}. The central brokerage of services is a central pillar to the YEPF, and is also supported by published research¹⁴ and also a key finding from the First Findings Report evaluation into the delivery of the Youth Guarantee¹⁵.

Delivery was flexible in nature, suiting the individual needs of the young people. On interviewing participants they particularly valued the team building, which had done much to increase trust between them, support with CV writing, and especially the personal support from personal advisors. There is further qualitative information from Strand C participants that the Pilot had a significant impact in helping them to address issues in their lives that acted as barriers to engagement in education, training and employment. The implication is that a successful NEET youth operation must address young people's needs in the round. It is insufficient to focus on a lack of skills, or knowledge of the labour market or a lack of interview technique, if what is preventing them from engaging with education, training and employment are health, housing or social issues. This also supports the approach taken of providing lead workers.

We have also noted that Cam Nesa bears similarities with the 'Symud Ymalen / Moving Forward' project recently completed across Wales. This project was delivered by the Third Sector and worked with young people who were leaving care or who had been involved in Youth Offending Services. This project had a very high success rate of getting young people into employment and used a number of different routes of delivery to cater for NEET young people with varying needs. A pdf

¹² *Engaging the Disengaged*, Kettlewell, K., Southcott, C., Stevens, E., McCrone, T. NFER Research Programme, 2012.

¹³ *The Early Bird..Preventing young people from becoming a NEET statistic*. Britton, J., Gregg, P., MacMillan, L., Mitchell, S. Department of Economics and CMPO, University of Bristol, 2011.

¹⁴ *Hidden Talents II. Re-engaging young people, the local offer*. The Local Government Association, 2013.

¹⁵ *Preparatory Action on the Youth Guarantee. First Findings Report*. Directorate-General for Employment, Social Affairs & Inclusion, European Commission, 2014.

copy of the 'Evaluation of Getting Ahead: the Symud Ymlaen / Moving Forward Project – Interim Report – 15 December 2014 is available via Google. The final evaluation is not yet published.

Section 2 - Core Criterion: Delivery

The specific evidence requirements needed for assessment against this criteria are as follows:

2.1 A description of the preferred option for delivery, including:

2.1.1 The ultimate change(s) sought or final outcome(s) of the operation;

Cam Nesa will ultimately seek to make a significant reduction in the number of 16-24 year old young people who are NEET through improved engagement specific to individual needs

The **vision** for the Operation is a participant-led, young-person centred network of opportunities, responding to those young people identified as NEET and then providing them with the right level of challenge and support, and additional activities to help them make genuine progress.

The **aims** of the Operation are:

- Reducing the number of 16-24 year-olds who are NEET
- Ensuring that all young people are supported to enable them to re-engage in employment, education and training whatever their intended destination may be.
- Providing improved engagement and progression opportunities for all young people and contributing to higher achievement rates
 - To promote longer term employability of those young people.
 - Linking with a wider range of initiatives seeking to support this group of young people
 - Working in an integrated way across existing local authority partnerships (e.g. 14-19 Networks, EPC-led multiagency meetings) and also cross-sector (Local Authority, Schools, FE Colleges, Third Sector, Training Providers, Careers Wales and Job Centre Plus.

Result target for the Operation:

(a) To reduce the number of 16 – 24 year olds who are NEET (Not in Employment Education or Training)

The **delivery mechanism** for the Operation comprises:

Assessment & Referrals

An **initial assessment** of each participant's barriers and needs will be undertaken in two separate fora specific to the young person's age:

- 16-18 year olds – Referrals will be made through the Careers Wales-hosted, monthly multiagency brokerage meetings held in each Local Authority area.

- 18-24 year olds, DWP will make direct referrals into the Operation (except those on the Work Programme).
During this initial assessment, a judgement will be made as to which ESF funded Operation will best suit the needs of the young person; referrals will be made onto the respective Operation (Communities for Work, PACE, Active Inclusion, Jobs Growth Wales 2). **Cam Nesa will only operate with young people that are not ready for employment or further training at the point of referral.** The operation will work with young people residing outside of Communities First wards, unless it is clearly demonstrated that there is no duplication of activity with Communities for Work.

Other routes into the operation include:

- Self-referrals
- Referrals from other independent organisations working with young people and other engagement activities.
- Working with stakeholder organisations to promote the operation
- The activity will be promoted through joint beneficiaries' websites and social media networks.

Once referred to Cam Nesa, a named Lead Worker will be allocated to the participant, and a second more rigorous, face-to-face **diagnostic assessment** will be made. This will include an appraisal of the challenges that the participant faces (e.g. motivation, confidence, anti-social behaviour, geographic isolation, offending history, i.e. those things that have led to their becoming disenfranchised), their basic skills and qualifications, their aspirations & their needs. In addition, an assessment will be made on the participant's work readiness using a common Participant Work Readiness template. After the second assessment, the Lead Worker, in agreement with the participant, will enrol the young person onto the Cam Nesa Strand that is best suited to their needs.

Strand 1- Pre-engagement Activities

For participants that have significant and potentially multiple personal and social barriers that prevent them from progressing straight into employment or further training, a bespoke programme of mentoring and support will be offered up to a maximum of 3 months. This might involve confidence and self-esteem raising activities, support in managing housing, transport, relationship and financial matters, and issues resulting from physical disabilities or Additional Learning Needs e.g. autistic spectrum disorder.

Strand 2- Pre-employment Skills and Qualifications

For participants with poor essential skills and low level or no qualifications, a variety of up-skilling opportunities and employment related qualifications will be offered to enable them to progress into employment, including communication, literacy, numeracy, digital literacy, and employment specific qualifications (e.g. Health & Safety, CSCS, Food Hygiene). Entrepreneurship skills raising activities will be offered to those interested in self-employment.

Strand 3- Employability & Work Experience

Participants that are closer to progressing into employment will be supported to:

- raise their awareness of the local labour market,
- better understand the requirements of vocational sectors, including pathways into work focussed vocational learning and self-employment
- manage their expectations in terms of sustainable employment
- become job ready by preparing a CV and having mock interviews
- undertake job searches
- appreciate the importance of engaging in work experience.

Participants will engage on work experience placements within appropriate sectors with employers selected to best suit the needs of the participant. Placements may comprise:

- Up to 16 hours over a period of 1 to 3 days per week whilst the participant is still engaging with Strand 1 and 2 activities
- Week-long tasters in a range of vocational areas with a view to progressing onto -
- Extended paid work experience placements of 16 weeks minimum up to 25 weeks maximum duration.

Participants will be supported through this process by their Lead Worker, who will engage with the work placement employer before and during the placement duration. Funding will be available to support transport, equipment, childcare and dress code/uniform/PPE. In the recent evaluation of Traineeships¹⁶ where employers had negative experiences they cited a lack of information about the young person's needs, and a lack of support/preparation (linked to provider role and programme design aspects such as lack of support for transport) and lack of commitment of the young person. It is hoped that the "wrap around" support from the Lead Worker, including direct employer engagement will ensure more effective engagement and outcomes.

The operation will build strong links with local businesses to ensure participants are prepared and equipped with the necessary skills and qualifications to fulfil recruitment needs.

The operation will work closely with employers to establish vacancies that will arise in the future to ensure participants have the relevant preparation, experience and skills to apply and effectively fill vacancies.

The operation will seek to address such skills gaps by providing suitable work focused training and experience to enable participants to effectively compete in the labour market and fulfil the requirements of recruiting employers.

¹⁶ <http://gov.wales/docs/caecd/research/2016/160713-evaluation-work-based-learning-2011-15-traineeship-summary-en.pdf>

<http://gov.wales/docs/caecd/research/2016/160713-evaluation-work-based-learning-2011-15-traineeship-summary-cy.pdf>

Strand 4- Enterprise and Self-employment

Participants with an interest in self-employment will be supported to:

- develop entrepreneurial skills and aspiration
- raise awareness of entrepreneurial opportunities
- engage with targeted entrepreneurial experiences including links with employers
- create and grow their own business idea
- Develop a business plan and be signposted to other business support programmes.

2.1.2 Evidence of a well defined scoping exercise of the activities necessary to deliver this/these changes – with identified ‘must have’, ‘prepared to consider’ and ‘might accept’ activities;

Consultation on the Operation’s potential activities began in October 2013 through the multi-agency 14-19 Networks in each Local Authority area. There followed on a scoping exercise to narrow down the initial wish list from beneficiaries in order to address the aims of the Operation.

2.1.2.1 “Prepared to consider”

Initial consultation involving 14-19 Networks and partners led to the compilation of an extensive “wish list” of opportunities for vulnerable and NEET young people across the region in October 2013. These comprised the following activities, grouped broadly into three themes:

Provision

- Pre-Skill Build activities for post-16
- PRU-EOTAS-Medical Needs SEN year 12 bridging courses
- Financial literacy
- Emotional literacy
- Residential opportunities for vulnerable groups
- Support for Pre/Post/ BTEC/ASDAN PSD’s qualifications for potential NEET students.
- Support for the delivery of work-related activities e.g.
 - Journey to work day; Skills Days;
 - STEM Days.
 - Numeracy in the Workplace.
 - Enterprise
 - WFE co-ordinators
- Support to arrange Bilingual Careers Convention.
- Summer School provision
- Employability/Soft skills development

Support

- Targeted Learning coaches

- Young carer additional support
- Family support engagement officers
- Transport costs in vulnerable areas/families
- Behaviour support
- Sector specific employment events
- Training programme for Third Party commissioned groups e.g. safeguarding/behaviour mgt/RP
- Self-esteem & Life skills
- Transition support
- Learning Pathway Advice & Guidance

Processes

- Work Experience co-ordinator
- Post-18 tracking officer
- Administrators for YEPF
- Finance officers/participant tracking officers

2.1.2.2 “Might accept”

This Long list was condensed further in December 2013 into a short list of 5 main areas of activity:

- Flexible start pre-traineeship transition activities age 16-25
 - Link to YEPF- delayed traineeship start often leads to disengagement
- Work focussed and work experience activities
 - Accreditations through WFE and W Ex
 - Peripatetic monitoring & support of W Ex
 - WFE skills / sector events / tasters
 - W Ex co-ordinators
 - Extended W Ex placements
- Targeted Support age 16-25
 - YEPF Lead Workers
 - Transition work & brokerage
 - Summer school provision
 - Engagement & Pre-employment strands
 - Restorative Practice- Entry Behaviour challenges
- Youth Engagement & progression co-ordination & administration
- Alternative activities age 16-18
 - To include Tier 2 provision for 16-18 year olds
 - To include digital literacy

2.1.2.3 “Must have”

The RLP initiated a process of rationalisation of potential SO2 Operations in mid 2014, and solicited the input of Expressions of Interest for those that would support the implementation of the *Regional Delivery Plan for Employment and Skills*. The

Multiagency Task and Finish Group led by Pembrokeshire Local Authority (detailed in Section 1.8) further worked on these five proposals, and whittled them down to two essential areas for further consideration. EOs were submitted in June 2014, and benefitted from further consultation in the ERW Region through two RLP-led brokerage seminars in September 2014 and January 2015. This process ensured alignment with the *Regional Delivery Plan for Employment and Skills*. The subsequent outcome of this work was the generation of two main groups of opportunities for young people which subsequently were incorporated into the Cam Nesa Operation Logic Table. These opportunities are:

2.1.2.3.1 Supporting participants by providing :

- Specialist Literacy and Numeracy Coaches to work with those who have not reached satisfactory attainment levels.

Lead Workers

- Outreach workers to provide Engagement Progression / Guidance, that is, to facilitate progression to and from complementary projects / activities / interventions and provide appropriate support and guidance for progression linking with JCP/WBL providers/Careers Wales/Voluntary Sector/FE. The Lead Workers are additional to those provided by Careers Wales for Tier 3.

Social and Emotional Support

- Targeted specialist counselling interventions, Restorative Practice Activity, Specialist support for BME/ALN/SEN, mental health, and emotional difficulties and homelessness
- Youth Advocacy.

Transition Support

- Transition Work & Brokerage Roles for participants when they are ready to progress onto the next stage of EET.
- Specialist enrolment and induction support for vulnerable groups.

Work focussed learning readiness support

- Pre-learning support training which encourages a positive approach to training and work to help those individuals who need to develop appropriate social, work ready and “learning to learn” skills (including revision and travel arrangements training).

Employability support

- Employability skills programme to better prepare participants for work – local labour market, how to market and promote your skills, cvs, online job search and applications, interview skills.

- Work Placement support and co-ordination including advanced work placements in highly skilled and productive sectors. e.g. STEM, creative industries, energy sector
- Peripatetic STEM or Creative Industry Learning mentors
- Employer mentoring support.

Entrepreneurship Support

- Supporting young people to aspire towards self-employment and entrepreneurship
- To provide learners with specialist entrepreneurship mentors to become future business leaders in specialist/high productivity sectors
- To support transition into self-employment.

By providing appropriate activities to engage participants in the following ways:
Education, Employment and Training (EET) Transition programmes e.g.

- Transitional Employability Skills activities related to learning and employment
- Tier 2 re-engagement provision for 16-24 year olds (with barriers to learning)
- Literacy/Numeracy programmes and associated support tutors, including in the workplace and work place skills.

Work focused tasters

- Vocational skills tasters/job fairs
- Skills event/tasters and courses
- Sector specific Information Advice and Guidance events including STEM and emerging sectors, and to challenge gender bias in certain sectors
- Employer forums
- Entrepreneurship activities

Work Experience activities

- Peripatetic monitoring & support of meaningful Work Experience, including safeguarding
- Extended Work Experience Placements
- Employer visits

Volunteering activities

- Enhanced Volunteering Support
- Extended voluntary work.

Financial Literacy programmes

- Debt management.

Digital Literacy programmes Tier 2, 3

- Using IT for life and work.

Emotional Support for targeted vulnerable young people.

2.1.1 Evidence that a number of alternative options for delivery were originally considered, including the methodology framework used - for example, a Strengths, Weaknesses, Opportunities, Threats (SWOT) analysis. The analysis itself can be provided as an annex to the business plan;

A number of alternative delivery options have been considered, and a SWOT analysis was undertaken to draw out a short-list of delivery options:

Strengths

- Project development informed by extensive local and regional consultation with a wide range of existing partners with successful track record in delivering ESF project outcomes
- All LAs and related partnerships have a proven track record in reducing the number of young people who are NEET in their areas
- Joined-up local approaches based on existing LA responsibilities for the YEPF (including VAP data), 14-19 Network and Families First lead roles
- Current sharing of pre and post 16 learner data is on-going, with multi-agency groups in place to share Careers Wales Tier data
- Interventions will be part of a co-ordinated programme of school improvement led through the ERW consortium and FE sector quality improvement;
- Project will include the use of the EIG and other WG grants as match-funding
- Use of RLP/RLSO intelligence to ensure the strategic fit of the projects with the economic development of the Swansea Bay City Region
- Youth Engagement and Progression Co-ordinators in post in all LAs to lead and co-ordinate the process of supporting young people at risk of becoming NEET in schools and FE settings
- ESF proposals aligned to the LA YEPF implementation plans
- Reducing the number of young people who become NEETs and the effects of poverty are key targets for all Local Service Boards

Weaknesses

- Joined-up partnership delivery across 5 local authorities will be challenging to co-ordinate
- Further ESF funding supports a culture of grant dependency with limited options for a project exit strategy
- ESF funding will end in 2020, with the potential for a significant group of young people being unable to be supported
- Dependence on public sector funding as match at a time of reducing public sector budgets year on year for the foreseeable future

Opportunities

- Ability to ensure that the provision and support is targeted at the young people who need it most
- Existing LA partnerships/ERW consortium well placed to join up a wide range of WG Strategies (e.g. YEPF, Qualified for Life, Rewriting the Future, Donaldson, school improvement, Families First, Communities First, inclusion MEAS, EOTAS, EHE, regional development etc...) for the benefit of children, young people and families
- Further development of common regional systems to ensure seamless support for young people across LA boundaries (e.g. Lead worker support)

- Clear fit for this project with the developing work of the RLP, Swansea Bay City Region and the Growing Mid Wales Partnership
- Alignment of these bids with the proposals from South East and North Wales to ensure consistency of support mechanisms wherever young people are in Wales
- Procurement framework approach offers the opportunity for third party providers including the voluntary sector to be part of project delivery without the need to contribute match-funding
- Potential for shared democratic scrutiny of project outcomes via shared Scrutiny Committee meetings
- Potential for strong links with key regional economic development schemes e.g. Swansea Bay Tidal Lagoon

Threats

- National ESF projects from WG and voluntary sector organisations duplicate what is being delivered through the regional project (i.e. the “Reach the Heights” scenario)
- Potential for the double-counting of beneficiaries
- Significant financial risk for Pembrokeshire as the lead body (and to the LA project beneficiaries at delivery) in administering the project across 5 LA areas
- Current local authority structures unlikely to exist by 2020

2.1.2 Evidence of a further analysis of a short list of potential delivery options. These options should have included a ‘do nothing’ option. This section should only provide a brief description of the short listed options and the methodology used. The detailed comparison is provided later under the Value for Money criterion.

An analysis of a potential shortlist of delivery options was undertaken, matched against the key ***Young Persons’ Building Skills in Education Employment and Skills Priorities*** detailed in the *Regional Delivery Plan for Employment and Skills*. A summary matrix is presented below, followed by a brief narrative for each option in sections 2.1.4.1 to 2.1.4.3

	Operation Business Drivers:	Delivery Options		
		Do Nothing	Centrally Delivered Operation	“Youth Guarantee” Model-Multi-agency Delivery (Mixed procured & Centrally Delivered)
<i>Young Persons’</i>	Improve the parity of esteem between	Unlikely	Possible, but restricted	Most likely-greater

<p>Building Skills in Education</p> <p>Employment and Skills Priorities</p>	<p>vocational and academic pathways, ensuring equality of status, value and perception by learners, teachers, parents, employers and education institutions and develop careers guidance that promotes the economic value of STEM subjects</p>		<p>diversity of activities and support will lead to reduced outcome levels</p>	<p>benefits from delivery of operation by procured specialist provision supporting centrally delivered activities</p>
	<p>Implement the Youth Engagement and Progression Framework within the regional context</p>	<p>Possible, but with reduced outcome levels</p>	<p>Possible, but restricted diversity of activities and support will lead to reduced outcome levels</p>	<p>Most likely- YEPF is underpinned by multi-agency working</p>
	<p>Increase the supply of an appropriately qualified, flexible workforce that responds to the demands of the regional economy, current employment opportunities and forecasted sector growth, through effective utilisation of a multi-agency approach</p>	<p>Unlikely</p>	<p>Possible, but restricted diversity of activities and support will lead to reduced outcome levels</p>	<p>Most likely- as Operation would be underpinned by multi-agency working</p>
	<p>Improve work readiness, basic digital skills of those entering the workforce and support local employers to ensure that the workforce is equipped to respond to new industries, technologies and vocations</p>	<p>Unlikely</p>	<p>Possible, but restricted diversity of activities and support will lead to reduced outcome levels</p>	<p>Most likely- greater benefits from delivery of operation by procured specialist provision supporting centrally-delivered activities</p>
	<p>Improve entrepreneurial skills, enterprise and an innovative culture</p>	<p>Unlikely</p>	<p>Possible, but restricted diversity of</p>	<p>Most likely</p>

			activities and support will lead to reduced outcome levels	
Outcome for the Operation	To reduce the number of 16 – 24 year young people who are NEET (Not in Employment, Education or Training).	Unlikely	Possible, but restricted diversity of activities and support will lead to reduced outcome levels	Most likely
Decision		Reject	Reject	Preferred

2.1.4.1 “Do Nothing”

Whilst the collective efforts of Local Authority core services, schools, FE Colleges, Voluntary Sector and other partnership organisations have made an impact on reducing the number of NEETs through a variety of schemes, the scale of the task in hand across the region is significant. Reductions in core budgets from Welsh Government have declined in the last budgetary cycle. Welsh Government grants have also changed significantly, with the end of 11 national grants to Local Authorities in March 2015. The bottom line implications of this financial contraction is that core services are being scaled back or removed in many instances, with provision being focussed on statutory responsibilities. All beneficiaries to the Cam Nesa Operation are committed to the principles of the Youth Engagement and Progression Framework, and inherent to this is the targeted approach to supporting vulnerable young people. Currently however the *Youth Engagement and Progression Framework Implementation Plan* is non-statutory and as such does not draw down core funding. As such, actions articulated in *Tackling Poverty Action Plans* written in 2012 and prior to recent budgetary reductions are unlikely to come to fruition, and commitments to supporting the most vulnerable young people in our society are unlikely to be met.

The “do nothing” option will at best maintain a low-level service to vulnerable young people with limited opportunities to tailor activities to individual need. This is unlikely to make significant impact on the young person’s barrier(s) to engagement with their education or training, and therefore break the complex links between poverty and attainment that are so desperately needed in the Region. **This option is rejected.**

2.1.4.2 Option 1- Centrally Delivered Operation

Given the reduction in central budgets identified above, it would be tempting for beneficiaries to utilise additional resources secured from ESI Funding to sustain current staffing and provision levels. This option is unlikely to secure the broad outcomes identified for the Operation as there is currently the recognition that there is insufficient capacity within the beneficiary institutions to deliver activities and support functions to support potential participants. As well as this, all beneficiaries acknowledge that for the Operation to be successful, there is the need to draw on wider expertise present within the region to offer bespoke, niche activities to meet individual learner needs. **This option is rejected.**

2.1.4.3 Option 2- “Youth Guarantee” Multi-agency Delivery (Mixed procured & Centrally Delivered Operation).

Business planning for the Cam Nesa Operation has benefitted significantly from the recent completion of the Pembrokeshire Youth Guarantee project, funded through the European Commission’s Directorate for Employment, Social Affairs and Inclusion’s “Preparatory Action on the Youth Guarantee”¹⁷. The proposal for a Pilot of the Youth Guarantee submitted to and selected by the Commission was for the provision of a Youth Guarantee Gateway for 15 to 25 year olds in Pembrokeshire. It aimed at assisting 80% of young people into employment, work-focused education or training within four months of leaving school/Further Education (FE) or becoming unemployed.

The provision was structured into three separate Strands:

Strand A: 15 to 17 year olds participating in schools or FE provision (but at risk of becoming NEET)

Strand B: 16 to 17 year old NEETs

Strand C: 18 to 25 year old NEETs

The project’s design was seen very much as a pilot to support the implementation of Welsh Government’s *Youth Guarantee* as offered through the YEPF. The project offered young people the following interventions delivered through a mixed economy of centrally delivered and procured activities:

- Personalised individual mentoring of young people
- ‘Bite-sized’ vocational tasters
- Development of personal and social skills
- Activities to better understand the world of work in the context of the local labour market
- Employability skills

¹⁷ EVALUATION OF THE PEMBROKESHIRE YOUTH GUARANTEE 2015. Preparatory Action on the Youth Guarantee, Directorate General for Employment, Social Affairs and Inclusion, European Commission Application Reference: VP/2012/012/0418

- Digital capability and on-line recruitment
- Work tasters, placements and clubs
- Job broking
- Employer events, visits and presentations
- Links to business and industry
- Career planning and progression
- Entrepreneurship and enterprise
- Money matters – financial independence
- Introduction to training and learning options
- Links to vocational learning, apprenticeships and mainstream employment programmes that support the journey into work
- Issue based work

Activities were brokered by through multi-agency working, with Strands B and C (the most applicable to the Cam Nesa Operation) delivering a mixture of short duration, timely interventions linked to young people's needs. Five beneficiary partners were successful in the tendering exercise, and activities were operational between October 2013 and September 2014. The Pilot successfully recruited 31 participants to Strand B. Of these 22 (71%) were male and 9 (29%) female. From Strand B 90% of participants achieved positive outcomes with 23 (74%) participants progressing to work focused learning, 4 (13%) into paid employment and 1 (3%) to volunteering with only 3 (10%) remaining NEET after 4 months. The Pilot successfully recruited 56 participants to Strand C. Of these 43 (77%) were male and 13 (23%) female. From Strand C 50% of participants achieved positive outcomes with 11 (20%) participants progressing to work focused learning, 13 (23%) into paid employment and 4 (7%) to volunteering with 28 (50%) remaining NEET after 4 months. A key success to the pilot project was the offer of a variety of support, engagement and employment focused activities to the vulnerable young person, which were centrally brokered. The involvement of employer engagement, a broad personal development and work focused curricula and personalised information advice and guidance is supported by a variety of published sources^{18,19}. The centrally controlled, institutional brokerage of services is a central pillar to the YEPF, and is also supported by published research²⁰. The mixed economy of centrally delivered and procured services allowed for a beneficial breadth of service provision to the

¹⁸ *Engaging the Disengaged*, Kettlewell, K., Southcott, C., Stevens, E., McCrone, T. NFER Research Programme, 2012.

¹⁹ *The Early Bird..Preventing young people from becoming a NEET statistic*. Britton, J., Gregg, P., MacMillan, L., Mitchell, S. Department of Economics and CMPO, University of Bristol, 2011.

²⁰ *Hidden Talents II. Re-engaging young people, the local offer*. The Local Government Association, 2013.

participants; each delivering organisation played to its strengths and there was no need for further capacity building or up-skilling. In this way, beneficiaries will capitalise on specialist knowledge of delivery partners, a key finding from the First Findings Report evaluation into the delivery of the Youth Guarantee²¹. Delivery was also flexible in nature, suiting the individual needs of the young people.

This is the preferred delivery model as it is the most likely one to succeed in delivering the outcomes required in the Operation.

2.2 Details of the delivery model to be utilised. For example, will the applicant operate a Financial Instrument? Will any elements of the operation be delivered through procurement? Any joint beneficiaries involved in the operation should be identified and the relationship between and responsibilities of all joint beneficiaries outlined. Guidance on delivery models can be obtained from WEFO's Regulations & Compliance team via your PDO and as detailed on the WEFO website.

The lead beneficiary is Pembrokeshire County Council. Joint beneficiaries are Carmarthenshire County Council, Ceredigion County Council, Neath Port Talbot County Borough Council, City and County of Swansea. The FE colleges in these areas will be involved to a greater or lesser extent, however, their precise involvement is subject to final negotiations.

The Operation will require ESF grant funding. Match funding will be provided by the lead and joint beneficiaries. Elements of the Operation will be procured. Procurement arrangements will follow each Local Authority's relevant procurement policies and will comply with established WEFO guidance.

Centrally-delivered support and engagement activities will be managed and delivered by joint beneficiaries. Each beneficiary will be responsible for the co-ordination of services in their respective area/sector, ensuring that interventions match identified local needs and are congruent with the vision, aims and indicators for the Operation.

The Operation will not operate a financial instrument.

The Operation will be centrally managed by Pembrokeshire County Council. The Central Management Team will be employed by Pembrokeshire County Council and will comprise a European Contract Officer, a Monitoring and Compliance Officer, a Finance Officer and an Administration Assistant. Joint beneficiaries will be responsible for local administration and finance, and will provide financial and other returns to the lead partner as required.

²¹ *Preparatory Action on the Youth Guarantee. First Findings Report.* Directorate-General for Employment, Social Affairs & Inclusion, European Commission, 2014.

2.3 The applicant should demonstrate:

2.3.1 Details of all public funding (including EU funding) received in the last 5 year period;

Pembrokeshire County Council is a Welsh Local Authority established in 1996 following Welsh Local Government Reorganisation. Its full accounts are published annually and can be found at:

http://www.pembrokeshire.gov.uk/content.asp?nav=101,100&parent_directory_id=646&id=25359&d1=0.

The council was registered for VAT on 01.09.95 and the number is – 655 8237 10.

2.3.2 Their track record of delivering similar operations, including formal evaluations of any previously delivered EU and/or publicly financed operations – outlining evaluation recommendations and improvements implemented as a result;

Pembrokeshire County Council established a European Unit as soon as it was established in 1996 and has successfully delivered European funded schemes worth many millions of pounds since then. In the most recent EU programme period, the County Council was responsible for delivering as a Lead Body, Lead Sponsor or Joint Sponsor in 78 EU funded projects.

Pembrokeshire County Council has been involved in a number of previous operations related to this target group. These include:

- Engage (Convergence ESF, Lead Sponsor: Neath Port Talbot CBC; Joint Sponsors that are common to Cam Nesa: Carmarthenshire CC, Ceredigion CC, and City & County of Swansea)
- European Commission Preparatory Action “Youth Guarantee” (Pembrokeshire CC).
- Cynnydd (ESF Operation to reduce the risk of young people becoming NEET; has the same geographic footprint as Cam Nesa)

Engage and the Pembrokeshire Youth Guarantee targeted both young people who were at risk of becoming NEET as well as those who were NEET. It is quite possible that some of the NEETs who will be participants in Cam Nesa may have been participants in the Cynnydd Operation.

Evaluations were carried out of all of these actions. That for Engage²² records that the project achieved all its targets and was also well regarded by participants, delivery staff, managerial representatives and other direct and indirect stakeholders. However, the project had a “stuttering start”, due to project delivery commencing before the appointment of core lead body staff. This had knock-on implications such

²² <http://gov.wales/docs/wefo/publications/evaluation/130211engageevaluationfinalen.pdf>

as the need to revise monitoring systems and retrospective data capture. Similar issues arose with the Pembrokeshire Youth Guarantee, which was originally only a twelve month pilot and so needed to begin delivery quickly. This influenced our advice to the Guilford Review that a mobilisation phase be introduced for the 2014-2020 programmes, and our intention to take advantage of the possibility of a mobilisation phase to ensure Cam Nesa delivery starts only once all necessary preparations have been made.

This will also help to tackle another difficulty highlighted by the Engage evaluation, namely the situation whereby outputs and results increase significantly in the last few months of a project as paperwork is completed as a project closes. This causes problems in providing on-going evaluation evidence to steer the direction of an operation during its delivery. For 2014-2020 this would also cause difficulties in claiming and so it is important that the issue is addressed during mobilisation. Data sharing protocols will also be developed at an early stage, as recommended by the Engage evaluators, to ensure data is transferred to the lead beneficiary effectively and efficiently.

Another recommendation from Engage related to the need to encourage networking across the delivery agents so as to ensure that good practice was shared whilst there was still time for that good practice to be replicated. Our governance arrangements include regular regional meetings, but we shall also encourage annual meetings of delivery staff, for instance through means of celebratory events.

The Engage evaluators also recommended that the lead partner team should include people with experience of ESF delivery, so that discussions with WEFO can be informed by the practicalities involved in delivering this type of project. The Pembrokeshire CC European Unit includes staff who have this “hands-on” experience.

The Engage evaluation called for consistent mechanisms for recording “soft outcomes” between partners. This is something that we accept and feel is important for this target group, however it will also be important for us to receive timely advice from WEFO on evaluation and monitoring – a further comment made by the Engage evaluators – if the mobilisation phase is to successfully completed. (It is acknowledged that WEFO and the European Commission are placing more emphasis on “hard” outcomes for the 2014-2020 programmes. Our interest in using “soft” outcome monitoring is to expand the data capture and so allow our evaluators to gain a deeper understanding of the performance of the operation).

The Youth Guarantee evaluation added some further points. One was to ensure that budgets included all relevant costs but also that they needed to be contained within the likely funding envelope. We are aware that at the present time there is some work to do to fully address this point. The evaluation also noted that procured

delivery had proved effective and efficient and should be employed in the future for this target group. The evaluation also stressed the importance of meeting social (and not just educational or employment) needs for this group. It is necessary to overcome a participant's social problems before higher level needs can be met²³.

2.3.3 Any other research evidence supporting the need and approach taken for this proposal;

The YEPF Implementation Plan clearly articulates the commitment to increasing engagement and progression of young people, and this vision is also detailed in the annual Ministerial Response Letter sent to Local Authorities and Further Education Colleges. In the Plan, Local Authorities are required to have the strategic responsibility for the implementation of the YEPF, and to provide operational leadership through the EPCs. Schools and Post-16 providers have the responsibility of identifying young people at risk of disengagement, tracking their progress and providing support to help keep them engaged. Careers Wales are required to bring a greater consistency to the framework, and support the brokerage of provision for NEETs by working in partnership with the EPC and other providers. It is recognised in the YEPF, that a range of specialist support services are vital in its delivery, providing a critical role in helping young people to overcome their barriers to re-engagement. It is also recognised that an appropriate mix and balance of provision is available to all young people.

The recently published *Regional Delivery Plan for Employment and Skills* (see Note 19.) is based on extensive data quarrying and consultation across the Region, and clearly articulates the skills needs base development of its young people. These priorities are congruent with those of the Operation, and will not be discussed here any further.

Whilst performance detailed in this review indicate that young people compare favourably against Welsh averages in terms of their attainment at the end of compulsory education, progression onto further and higher education, and NEET numbers, progress against key performance indicators are varied across the Region, and there remains a significant challenge to re-engage the most vulnerable young people that are currently NEET. As discussed in Section 2.1.4.3, there are a number of published studies that support the preferred delivery model approach.

2.3.4 That it has the required legal basis for delivering the stated activities;

The Cam Nesa Operation will work alongside other existing YEPF services, including Youth Services, Careers Wales, Learning Coaches, Youth Offending Teams, support for looked after children and young people, and interventions offered by Further Education colleges, training providers and the voluntary sector. The following legislation is relevant to the Operation:

²³ This is an implication of Maslow's Hierarchy of Needs.

Section 123 of the Learning and Skills Act 2000 provides that the National Assembly for Wales may direct a local authority:

- (a) to provide youth support services;
- (b) to secure the provision of youth support services;
- (c) to participate in the provision of youth support services.

“youth support services” means services which in the opinion of the National Assembly will encourage, enable or assist young persons (directly or indirectly):

- (a) to participate effectively in education or training,
- (b) to take advantage of opportunities for employment, or
- (c) to participate effectively and responsibly in the life of their communities.

Direction and Guidance provided by Youth Support Services Directions (Wales 2002) and Welsh Government document “Extending Entitlement support for 11 to 25 year olds in Wales” – currently under review.

Local Government Act 2000 – Part 2 An Act to make provisions with respect to the functions and procedures of local authorities.

The Children and Families Measure 2010 places a statutory duty on authorities to tackle child poverty through a more co-ordinated, multi-agency collaboration and targeted intervention.

2.3.5 That is has or will have the necessary governance arrangements for delivery.

Governance arrangements will be as follows:

The overall operation will be managed by a European Contract Management Team based within the European Unit of Pembrokeshire County Council. It is currently envisaged that this will consist of a European Contract Officer, a Finance Officer and a Senior Administration Officer. Their role will be to oversee all aspects of contract and compliance administration. They will liaise with staff responsible for delivery in each joint beneficiary and expect timely responses to requests for information and reports.

Each joint beneficiary will be expected to hold a Project Board meeting every quarter and feed a Progress Report to the Regional Project Board. This Board will meet every quarter and will be chaired by the Director of Children and Schools for Pembrokeshire County Council to ensure that the appropriate level of accountability is given to all actions and progress. Updates will be given to the Council’s Corporate Management Team for review. In addition progress on EU funded projects will be reported to both the Council’s ‘Economy’ and ‘Children and Families’ Overview and Scrutiny Committees, however, reporting arrangements are currently being revised and we cannot give precise details of reporting frequency. In addition, European

Officers for the South West region, report bi-monthly on progress and risk to the South West Wales Directors of Regeneration.

2.4 Provide an outline assessment of the primary risks and any dependencies that are critical to the successful delivery of the operation.

SECTION 2.4 Risks and Dependencies

This is a summary of major perceived risks however a detailed Risk Analysis can be found at Annex 7.

Risk Category	Key Risk	Control Measure / Mitigation
Economic / Financial	Failure to spend to profile.	Detailed planning and preparation during the Mobilization Phase will ensure that resources are in place to deliver to profile. During delivery regular Project Board meetings will ensure a high level of accountability.
	Procured items exceed budget.	Project beneficiaries have experience of procuring delivery in this field and should be able to specify requirements appropriately.
	Submission of late / incomplete claims.	Correct training will be given to project management and financial staff to ensure their compliance with timescales.
	Ineligible expenditure.	Correct training will be given to project management and financial staff to ensure compliance with Eligibility Rules.
Legal / Regulatory	Failure to comply with WEFO Guidance.	Correct training will be given to project management and financial staff to ensure compliance with Eligibility Rules and other published guidance documents.
	State Aid compliance.	A detailed State Aid assessment will be completed (see Section 3.6). but at present we do not perceive a significant State Aid. Much of the delivery will be procured and the procurement exercise provides a defence against State Aid challenge. We do require detail of further Education State Aid cover for in-house provision. The project will be reported to the Pembrokeshire County Council

Appendix 2

	<p>Compliance with Health & Safety issues.</p> <p>Procurement procedures not adhered to.</p>	<p>Corporate State Aid Group in order to keep this under review.</p> <p>Senior Managers within Pembrokeshire County Council have undergone H & S training. The Council has a Safety Unit.</p> <p>Correct training will be given to project management and financial staff to ensure compliance with Procurement Rules. The procurement Division will advise on technical procurement questions.</p>
Organisational / Management	Project Governance not robust.	A Project Governance Structure is outlined in Section 2.3.5 and will be agreed by all partners before the operation commences.
Human Resources	Inability to recruit staff.	This preparatory work will be initiated in the Mobilisation Phase in order to avoid causing any delays to project delivery.
Political / Societal	Local Government Reorganisation.	The exact timescale for this is not yet known. If this begins during the lifetime of the operation then appropriate legal advice will be sought regarding the transfer of responsibilities to new organisations.
Environmental		It is thought unlikely that there are any environmental issues that could severely affect the delivery of this operation.
Technical / Operational	Loss of senior staff on the project.	As there will be a high level of accountability within the organisation, then senior management will be able to second resource to cover any staff losses during any gaps in employment.
Project	<p>Failure to achieve / demonstrate outputs.</p> <p>Communication inadequacies.</p>	<p>All partners to be accountable to the Regional Project Board which in itself has several lines of accountability internally and across the region.</p> <p>It is essential that all project staff are fully trained with WEFO guidance and that a Communications Strategy is written for the project as early as possible.</p>

	Sub-standard delivery by procured organisations.	Pembrokeshire County Council staff have received 'Contract Management' training in order to overcome any delivery issues. If necessary Procurement Division staff can be called in for specialist advice and support.
	Safeguarding issues.	The Lead Sponsor will ensure that colleagues across the region are appropriately up to date with all the latest safeguarding issues. Corporate procedures will be followed.
	Duplication of activity with other SO1 funded projects.	Several meetings have already taken place with the two other regional projects and some WG projects within this Specific Objective and regular meetings are planned in order to ensure consistency of approach and to avoid duplication.

2.5 Provide details of any aspects of your operation that you consider are innovative.

The Operation will be innovative by learning from key messages that emerged from the evaluation of the Youth Guarantee Pilot Action projects²⁴ by:

- Providing information advice and guidance of local labour markets to young people so that they are better aware of future career pathways
- Providing work focussed experiences in sectors important in local labour markets, strengthening the gap between education and business
- Promoting youth enterprise and pathways into self-employment
- Working within existing local multi-agency partnerships that already share information and data and have operational Information Sharing Protocols
- Capitalising on existing experience and expertise that already exists in the region by operating a mixed economy of centrally-managed and externally procured services.
- Providing a mixture of support and activities relevant to the individual needs of the young person as opposed to “blanket” provision.

²⁴ *Preparatory Action on the Youth Guarantee. First Findings Report.* Directorate-General for Employment, Social Affairs & Inclusion, European Commission, 2014.

Section 2A: Further Strategic Criterion

Indicators & Outcomes

Introduction

This section provides a detailed narrative of the outputs and results expected to derive from the Cam Nesa operation. It is supplemented by three Annexes:

- Annex 6: Monitoring and evaluation plan
- Annex 2: Delivery profile (indicators)

The target group for this operation comprises individuals who are the most difficult to engage and are already NEET. Our previous experiences of other projects indicate that these outputs are realistic, given the intensive support that many participants in the project will need. These previous projects include:

- Convergence ESF: Engage (80434)
- Pembrokeshire Youth Guarantee (European Commission DG for Employment, Social Affairs and Inclusion reference VP/2012/012/0418)

During delivery of the operation potential participants will be identified by:

- Self-referrals
- Referrals from other organisations working with young people and other engagement activities.
- Working with stakeholder organisations to promote the operation
- The activity will be promoted through joint beneficiaries' websites and social media networks.

The operation will provide a range of measurable hard outcomes, directly measurable against the Priority Indicators. The targets we have set for these outcomes would not be achievable in their entirety without the additional funding provided by ESF support. The project will aim to get young people into employment or into education / training and where appropriate ensuring they have the opportunity to complete employment related qualifications.

Longer Term Benefits

A reduction in the number of young people becoming NEET is an objective of both the West Wales and the Valleys ESF Programme 2014-2020 and the Welsh Government's YEPF. The reasons why this has been identified as an important strategic objective for both West Wales and the Valleys and Wales as a whole is the cost to society of allowing young people to become NEET. These costs may be considered to include losses to the State, in the form of foregone tax and National Insurance, the cost of benefits, and additional costs of health and social services

(above those for non-NEETs). These were estimated by the University of York²⁵ on a lifetime basis to be £56,300 per NEET.

There are also “resource” costs associated with income foregone in the households in which a member of the family is NEET. This is a contributory factor in low household income and therefore poverty, including child poverty. These resource costs were estimated in the same University of York study on a lifetime basis at £104,300.

Short and Medium Term

The short and medium term achievements will be measured with the use of a “distance travelled” tool which will be developed in line with the needs of the participant group and appropriate for their use to monitor their progress and well-being. See Annex 8.

Lead Workers will undertake an initial eligibility assessment to ensure that the young person is eligible to participate in the operation. A second more rigorous, face-to-face diagnostic assessment will be made. This will include an appraisal of the challenges that the participant faces (e.g. motivation, confidence, anti-social behaviour, geographic isolation, offending history, i.e. those things that have led to their becoming disenfranchised), their basic skills and qualifications, their aspirations & their needs. In addition, an assessment will be made on the participant’s work readiness. After the second assessment, the Lead Worker, in agreement with the participant, will enrol the young person onto the Cam Nesa Strand that is best suited to their needs.

The operation is based on targeting 2,000 beneficiaries across the Cam Nesa area. A proportion has been allocated to each county based on the number of Tier 2 NEETs that they have recorded over the previous two years. These county allocations will be reviewed after the first twelve months of the project operation.

²⁵ Coles, B. et al (2010) “Estimating the life-time cost of NEET: 16-18 year olds not in education, employment or training” University of York (available: <http://www.york.ac.uk/spsw/research/neet/>)

Appendix 2

Output	Target	Target by Unitary Authority area	
NEET Participants (16-24 years of age)	2,000	Carmarthenshire	500
		Ceredigion	75
		Neath Port Talbot	450
		Pembrokeshire	277
		Swansea	698
NEET Participants (16-24 years of age) – Male PROGRAMME INDICATOR		Carmarthenshire	TBC
		Ceredigion	TBC
		Neath Port Talbot	TBC
		Pembrokeshire	TBC
		Swansea	TBC
NEET Participants (16-24 years of age) – Female PROGRAMME INDICATOR		Carmarthenshire	TBC
		Ceredigion	TBC
		Neath Port Talbot	TBC
		Pembrokeshire	TBC
		Swansea	TBC
Output	Target	Target by Unitary Authority area	
Participants with a disability		Carmarthenshire	TBC
		Ceredigion	TBC
		Neath Port Talbot	TBC
		Pembrokeshire	TBC
		Swansea	TBC
Participants with a Work Limiting Health Condition		Carmarthenshire	TBC
		Ceredigion	TBC
		Neath Port Talbot	TBC
		Pembrokeshire	TBC
		Swansea	TBC
Migrants / BME / Minorities		Carmarthenshire	TBC
		Ceredigion	TBC
		Neath Port Talbot	TBC
		Pembrokeshire	TBC
		Swansea	TBC

Output	Target	Target by Unitary Authority area	
Participants with Caring / Child caring Responsibilities		Carmarthenshire	TBC
		Ceredigion	TBC
		Neath Port Talbot	TBC
		Pembrokeshire	TBC
		Swansea	TBC
Results (within 4 weeks of leaving)	Target	Targets by Unitary Authority area	
NEET Participants (16-24 years of age) gaining employment upon leaving PROGRAMME INDICATOR		Carmarthenshire	100
		Ceredigion	15
		Neath Port Talbot	90
		Pembrokeshire	55
		Swansea	140
NEET Participants (16-24 years of age) in education or training upon leaving PROGRAMME INDICATOR		Carmarthenshire	TBC
		Ceredigion	TBC
		Neath Port Talbot	TBC
		Pembrokeshire	TBC
		Swansea	TBC
NEET Participants (16-24 years of age) gaining qualifications upon leaving PROGRAMME INDICATOR		Carmarthenshire	TBC
		Ceredigion	TBC
		Neath Port Talbot	TBC
		Pembrokeshire	TBC
		Swansea	TBC

Operation Activities

The activities to be undertaken in this operation are:

1. Identify NEETs within the target age group through referral routes (including self-referral).

2. Assess the circumstances and factors that contribute to their becoming NEET, for each individual.
3. Identify and deliver appropriate individualised interventions to counter those risk factors. Strands 1 – 4 are available, see section 2 - Delivery.
4. Where appropriate, provide careers advice and employability qualifications to participants.
5. Participants will engage on work experience placements within appropriate sectors with employers selected to best suit the needs of the participant.

Monitoring

Monitoring will take place at two main levels within the Operation. Each joint beneficiary will capture monitoring data about the beneficiaries with which they deal. The joint beneficiary will be responsible for ensuring data is complete and accurate, including all category breakdown information. The second level of monitoring will take place at lead beneficiary level. This will be carried out by a full time officer from the Unit's European Contract Management Team (ECMT). This officer will also pay regular visits to joint beneficiaries to review the operation of monitoring processes so as to provide assurance that data quality is being achieved and maintained. The lead and joint beneficiaries already have experience of the issues involved.

The first stage of the monitoring process will be to collect from participants before they are formally admitted to the operation, sufficient data to verify eligibility.

Each participant will be issued with a unique identifier that will be used to identify related documents, files and database entries. They will also allow anonymised analysis of participant characteristics etc whilst maintaining a link back to original records in case of queries. It is our intention to establish a bespoke project database within the mobilisation stage, which will record participants' data relating to their characteristics, progress made, courses undertaken, skills gained, qualifications obtained and distance travelled. This bespoke project database will be in place at the start of delivery which will enable the ECMT and the joint beneficiary delivery teams to have access to quality assured participant monitoring information. Input from our external evaluator, once appointed, and from WEFO RME will be welcomed as the database is developed to ensure that all demands for non-financial management information can be met.

The database will be fundamental to the production of management reports required by the Regional Project Board and lead beneficiary, joint beneficiaries, WEFO, the external evaluator and other stakeholders. This data will also inform reports that it is anticipated will be required by the Swansea City Region Board, the Growing Mid Wales Partnership, the South West Local Authority Regional Directors, and possibly by the Haven Waterway Enterprise Zone and the Teifi Valley Local Growth Zone.

Progress in achieving output and result indicators will be reported to WEFO with the quarterly claims and monitored against the Cam Nesa Delivery Profile (Annex 1).

Pembrokeshire County Council will have lead responsibility for this and officers within its European Unit already have substantial experience of reporting project data to WEFO and using WEFO Online systems. We shall comply with all WEFO requirements in relation to this process.

Evaluation

The partnership behind Cam Nesa recognises the necessity to thoroughly evaluate operations such as this and therefore it is our intention to procure at an early stage an experienced external evaluator to work with us throughout the life of the operation. This contract will be managed by Pembrokeshire County Council's European Unit, which has developed considerable experience of managing the evaluation of EU funded projects and programmes. The European Unit also has the advantage of currently being led by a member of the WEFO Evaluation Advisory Group.

The evaluation methodology to be employed is to be proposed by the evaluator as part of the procurement exercise. Our expectations are that it will gather data from of both quantitative and qualitative sources such that the data can be triangulated and in so doing permit one data source to be verified against another. We also expect that for an operation of this size a suitable counter-factual impact evaluation methodology will be employed to allow robust estimates to be made of the impact of the operation.

Three phases of work are envisaged, being:

Phase 1: Inception

The main output from this stage will be an Inception Report, which will expand upon the information contained in the appointed contractor's tender with respect to evaluation methodology, timescale and risk analysis. It will also contain a review of the proposed monitoring systems and processes to be carried out at the end of the mobilisation phase in order to provide assurance that the monitoring data obtained will be of sufficient quality, timeliness and completeness to support meaningful evaluation results using the proposed evaluation methodology.

It is expected that the Inception Report will be available within one month of the mobilisation phase ending.

Phase 2

The evaluator will be expected to deliver a formative evaluation twelve or fifteen months after the mobilisation phase ending. The precise timing will be agreed with

the evaluator at the time that the Inception Report is prepared. It needs to be timed so that sufficient time has elapsed for meaningful conclusions to be drawn, but not so late that recommendations cannot be acted upon. This report will be expected to inform the delivery of Cam Nesa for the second half of its delivery phase. As such, it will be expected to identify practical issues and solutions that can be addressed in the time available and which will have a positive impact on the value of money, effectiveness and/or efficiency of the Cam Nesa operation.

This report is expected to focus on the following issues, though this is subject to agreement with the appointed evaluator:

- Operation management, including relations between the lead and joint beneficiaries, processes for claim management, monitoring and administration, contract management of procured providers, and risk management.
- Achievements against output and result indicators, with a view to assessing whether the operations targets are likely to be met both overall and at individual beneficiary level.
- Financial performance, to allow comparison to be drawn with achievement against targets and to assess whether there is a possibility of over or under commitment of expenditure.
- Stakeholder perceptions, especially those of front-line staff and participants.
- Implementation of the cross-cutting themes, especially those with the greatest alignment to the operation's objectives, i.e. tackling poverty and equal opportunities.

Phase 3

The final phase is to be a summative evaluation at the end of the delivery phase. It is to be published during the closure period. This will build on the Phase 2 report covering much of the same ground but from a retrospective perspective. However it will also employ a suitable counterfactual impact evaluation methodology to assess the impact of the operation; that is to assess what was achieved beyond that which might have been expected to occur in any case.

Evaluation findings and recommendations will be reported to the Regional Project Board. They will decide whether recommendations will be accepted and if so, what action should be taken to address them. The action to be taken will then be implemented through the Regional Manager and lead beneficiary's ECMT Manager, as appropriate.

Evaluation findings will be disseminated to other interested groups:

- WEFO: a copy of all evaluation reports in draft form will be provided to our WEFO PDO for comment. After the report is finalised a copy will be provided to the WEFO PDO.
- The Welsh Government (Department for Education and Skills) both at a Ministerial and official level.
- Beneficiary organisations' boards of management. These will differ from organisation to organisation but will include for FE Institutions the Boards of Governors and Principals, and for local authorities elected Members, especially those holding relevant Cabinet portfolios and positions on relevant Scrutiny Committees, and Chief Officers.
- Operation staff.
- Cam Nesas contracted delivery organisations and other organisations or groups working with NEET young people.
- The European Commission (DG Employment, Social Affairs and Inclusion).
- The OECD.

Evaluation reports will be published on the lead beneficiary's website and joint beneficiaries will be encouraged to do likewise. Should the evaluator ask for permission to publish any of the evaluation reports this will be granted.

Please also refer to the Monitoring and Evaluation Plan attached to this Business Plan at Annex 6.

Section 2B: Further Strategic Criterion

Management of the Operation

2B.1 A description of the governance & human resource requirements for the operation showing that you have a clear and detailed understanding of:

2B.1.1 The governance arrangements necessary for delivery of the operation, including the identity and role of the Senior Responsible Officer (SRO);

As an Education operation agreed by ERW (Education Regional Working) the regional committee for South West Wales, the Senior Responsible Officer will be Pembrokeshire County Council's Director for Children and Schools. The Director will be accountable for regional delivery and the following groups will oversee the progress of the operation;

Regional Strategic Board

The SRO – PCC Director of Children and Schools – will chair this board and it will be made up of other strategic decision makers from each of the joint beneficiaries, and if unavailable for a meeting, an appropriate representative will be asked to attend. The aims of the board will be to – (i) exercise functional and financial authority to support the project; (ii) receive reports from the European Contract Management Team (ECMT – see below) concerning spend, outputs and risk in order to monitor progress/authorise variance from planned delivery and determine appropriate course of action based on recommendations from the European Officer. It will meet quarterly.

Regional Operational Board

This is an operational group whose role is to assist in delivering activities in accordance with the agreed Business Plan and WEFO approval letter. This board will comprise the effective lead officer for delivery, from each of the joint beneficiaries. As lead beneficiary Pembrokeshire County Council, a European Officer from the ECMT will chair the group. The board has an important role to play in enabling good communication throughout the operation. Supported by the ECMT the group will try agree solutions to issues raised by delivery staff, and will also share good practice and lessons learned. If there are any matters that the group is unable to resolve among its membership, with the support of the ECMT, the Regional Operational Board will escalate matters to the Regional Strategic Board for direction. It will meet monthly to begin with and review this after the first six months, it may then be appropriate to hold meetings less frequently.

Local Project Board

Each local authority area will establish a local Project board comprising a member of senior delivery staff from each joint beneficiary (local authority and FE College where

there is involvement) along with representation from the ECMT. The Project Board will meet monthly and will be chaired by a local authority senior delivery officer.

In addition the Director of Children and Schools will also be accountable to the following committees / partnership working groups:

- Pembrokeshire County Council Corporate Management Team (CMT) and Cabinet; CMT (report 14 October 2015 - Annex 9) and Cabinet (report 30 November 2015 - Annex 10) have given approval for PCC to be involved in the development of the operation's partnership working and business plan development with the ultimate aim of securing Structural Funds to allow this activity to go ahead. CMT will receive regular reports on the progress and achievements of the operation and meets weekly.
- SWW Regional Directors of Regeneration – a partnership of South West Wales local authority directors with responsibility for European Funding have also received reports about the emerging operation. This group will also receive regular risk reports of all Structural Fund operations across the region to ensure that appropriate progress is being made. The group meets bi-monthly and receives risk reports quarterly, however, would receive exception report at anytime if it were felt necessary. (South West Wales Regional Directors of Regeneration Group, which comprises the Directors of Development (or equivalent), Heads of Economic Development (or equivalent) and European Managers (or equivalent) from Neath Port Talbot CBC, City & County of Swansea, Carmarthenshire CC and Pembrokeshire CC, joined by these staff from Ceredigion and Powys CC for appropriate agenda items. The Group, amongst other things, acts as an officer group behind the Swansea Bay City Region and advises local authority Leaders and Chief Executives on matters of regional economic development interest including the European Structural and Investment Funds).
- ERW (Education through Regional Working Committee) – Executive Committee of Directors of Education sanctioned the decision for the partnership working to go ahead and will receive frequent reports.
- Swansea Bay City Region (Pillar 3 Group – European & other funding) will also receive reports on all Structural Fund operations.

2B.1.2 The key management and staff functions considered necessary;

In order to oversee an operation of this scale and complexity, it is necessary to consider two different types of management / staff resources:

- Contract Management
- Delivery of Activity.

As the Lead Sponsor, Pembrokeshire County Council will utilise the resources available through its European Contract Management Team (ECMT). The team will consist of the following roles:

European Contract Management Team

European Officer

A senior member of staff will be responsible for leading the ECMT staff and ensuring compliant delivery of the operation across the joint beneficiary partners in accordance with applicable law, EU regulations, and WEFO guidance. This will include the management of robust, enforceable agreements with all third parties involved in the project, whether partner organisations or contractors.

This officer will manage all external audits and verification checks of EU projects managed by ECMT and also carry out reviews and investigate any compliance matters escalated by the project teams.

This officer will report to the European Manager within PCC and will be accountable to both a Regional Project Board, will chair the Regional Operational Board and will sit as a member of the local Pembrokeshire Delivery Project Board.

Finance Officer

To assist the European Officer by ensuring compliance in the financial delivery of the operation, in line with the agreed Business Plan and Delivery Profile. The post holder will use robust procedures to liaise with joint beneficiaries to compile financial claims.

Senior Administrative Officer

To support the collaborative delivery of European funded projects, ensuring effective services are provided in compliance with the regulations. Development and maintenance of all management systems in relation to an EU project, including the verification and compilation of monitoring information supplied by joint beneficiaries, ensuring participants' eligibility, for submission to WEFO. To assist the European Officer regarding procurement and management of external evaluator(s) and development and delivery of the project publicity plan.

Support will be given to all joint beneficiaries to ensure their understanding of compliant delivery, including compliance with the Programme's Cross Cutting Themes.

This Officer will assist the whole ECMT staff providing both clerical and administrative support to ensure the smooth-running of the function. This will include verifying eligibility and output evidence. Maintaining administrative and archive systems including producing documents, liaising with joint beneficiaries, arranging

meetings and events as well as requiring IT and presentation skills, in order to help with a range of marketing and publicity media including website maintenance.

Pembrokeshire Local Delivery Team

Project Delivery Teams will be established in each Local Authority area, these will vary slightly within each area depending upon the resources required to deliver the activities identified. The Service Pembrokeshire Local Project Delivery Team will comprise the following:

Youth Service Manager, Pembrokeshire Youth

Responsibility for ensuring that activity in Pembrokeshire is delivered as agreed and on profile with the Business Plan, achieving timely spend and outputs required for the operation.

Youth Service Team – led by Area Youth Co-ordinator

The coordinator will oversee the staff and organisations contracted to deliver activity, control the project budget and work with the ECMT to ensure compliance. This person will report to the Service Manager, Pembrokeshire Youth and will coordinate provision for each young person. In addition they will facilitate a local monthly Project Board meeting whilst liaising with other joint beneficiaries to ensure project coherence and continuity.

Grants Administration Officer

Finance Support – to work within the Cam Nesa team to ensure control over local project spend.

Operational Administrator

Providing administrative support to the Pembrokeshire delivery team, including managing participant documentation and the participant database.

Delivery Team

The team will be responsible for a caseload of individual participants to ensure that they are receiving appropriate provision; provide lead worker support and guidance to help maintain participant's engagement with delivery and to liaise with other officers and agencies as required.

Youth Service – pre-engagement activities.

Futureworks - (Pembs County Council department which delivers employment and skills programmes to support unemployed and economically inactive people) **will** provide pre-employment skills, qualifications employability and work experience as well as Enterprise and Self-employment activities.

Pembrokeshire College - will provide pre-employment skills and qualifications as well as employability and work experience.

Joint Beneficiaries Project Delivery Teams

Each joint beneficiary will establish their own delivery team. This may have parallels with that outlined above for Pembrokeshire CC, but may also be expected to have differences due to local differences in working practices and the circumstances of each area.

Job descriptions for all staff funded by Cam Nesa may be found at Annex 11.

2B.1.3 The skills and knowledge needed for each identified staff member and how these competence requirements will be met through recruitment and / or procurement within the required timeframe;

Please refer to job descriptions for Cam Nesa staff at Annex 11, which include person specifications. A statement on the skills and knowledge within the lead body's European Contract Management Team and European Unit management is given below.

European Contract Management Team

Pembrokeshire County Council first established a European Unit in 1996 and has successfully delivered European Funded schemes worth many millions of pounds since then. In the most recent EU funding programme 2007 – 2013, the County Council was responsible for delivery in over 70 EU funded projects as Lead Body, Lead Sponsor or Joint Sponsor. All European funded projects are monitored by the European Unit irrespective which department within the County Council is responsible for delivery of the scheme. During the last programme period PCC established the European Contract Management Team (ECMT) with a remit to manage all delivery, claim and compliance for projects for which Pembrokeshire was lead body or acting on behalf of other third parties. The team included both Contract Officers and Finance Officers. All staff members to be recruited into these posts will be identified as having the appropriate skills and experience to undertake the roles outlined.

European Manager

All staff within the ECMT will be the responsibility of the European Manager, presently Gwyn Evans. Gwyn has worked full time on European Affairs since 1994. His role with Pembrokeshire County Council covers all EU policy areas, but most particularly Structural Funds, rural policy and State Aid. During the Objective 1 Programme he managed the Pembrokeshire Partnership Secretariat, providing full support to the Pembrokeshire Partnership Management Board, and was a member of the Community Assets Strategy Partnership and the Thematic Advisory Group 3

(Community Economic Regeneration). He has served as the WLGA representative on the Ireland – Wales Interreg IVA Steering Committee 2 dealing with Climate Change and Sustainable Regeneration. He has addressed a seminar on transnational co-operation during the European Commission's Regional Policy Open Days and is the WLGA representative on the All-Wales Structural Fund Evaluation Advisory Group. Gwyn is a Chartered Secretary and Accounting Technician, and obtained his Masters in Business Administration in 2003.

2B.1.4 Confirmation that all resources required for effective delivery is or will be available;

Confirmation of resources is given in the individual letters of commitments and match-funding from all joint beneficiaries in Annex XX.

2B.1.5 How staff will be managed and performance indicators identified and monitored;

All staff members working on the operation will have a line manager responsible for supervision and support of the day to day work. Through a comprehensive and regular reporting of project progress at a number of different levels, this operation will be kept under close scrutiny. Individual staff members all undergo a Performance Appraisal on an annual basis which ensures that all competencies are being met and targets achieved. In addition specialist support is available from all departments in the local authority including Learning & Development, Personnel, Finance, Procurement, Health & Safety and the European Team.

See section 2B1.1 above for details of regional governance structure.

In addition the operation will be subject to regular WEFO MVT scrutiny under the new claiming arrangements for the 2014 – 2020 Programmes.

2B.1.6 Confirmation that detailed continuity processes are in place to ensure that a strong link between the business plan and the delivery team is maintained and any loss of staff members will not lead to a 'drift' in the agreed delivery;

Continuity of delivery will be maintained through the operation structures described in 2B1.1. However teams in PCC are accountable to other management team meetings in the various departments of the local authority who meet on a regular basis.

- Budgets are reviewed on a monthly basis and reported to the senior accountant responsible for that section.
- The European team report every month to the Director of Development with regard to the progress of all European funded projects within the Authority.

- Progress on EU funded projects will be reported to the appropriate Overview and Scrutiny Committee.
- European Officers for the South West region also report bi-monthly on progress and risk to the South West Wales Directors of Regeneration.

Any potential for significant drift will be identified at these meetings and actions taken to correct any slippage.

2B.1.7 A draft exit strategy for staff.

At the end of the operation all core staff will continue in their core roles. ESF funded staff may have the opportunity to seek new posts under redeployment arrangements in their respective organisations, otherwise contracts will be terminated and staff made redundant for which provision has been made in the budget.

2B.2 All time critical governance and human resource activities described above must be incorporated into the delivery profile, with a specific focus on those activities that are essential for the preparation for delivery (which will constitute key milestones during the mobilisation of the operation).

See Delivery Profile at Annex 1.

2B.3 Provide details of any necessary tender specifications for elements of the project that will be procured. Draft early tender notifications, Pre Qualification Questionnaires (PQQs) or Invitation to Tender (ITTs) and associated draft contracts should be included in an annex to your Business Plan wherever possible.

If there is a requirement for a procured service in a local authority this is likely to be quite specialised and the requirement will be met by the joint beneficiary themselves.

2B.4 Provide details on initial and ongoing risk identification, mitigation and management. Have regular reviews been timetabled? What thought has been given to contingency planning if identified as necessary, such as in the event of any changes in demand that may impact on the successful delivery of the proposal? Include the identification of any procurement risks, such as securing suitable plant and or sub contractors.

Risk management processes for the operation as a whole will follow those of the lead beneficiary, Pembrokeshire County Council. The Council's risk management process comprises the following steps:

1. Risk identification and categorisation (into financial, infrastructure, people & knowledge and political risks).
2. Analysis of risks to assess their likelihood (probability) and impact.
3. Review of controls and control effectiveness.
4. Responding to identified risks.

5. Recording, monitoring and reporting, using a Risk Register (see Annex 7) and the Council's web-based system.
6. Aggregation of results and decision making.

The purpose behind the Council's risk management processes for this operation is to ensure:

- That the risk responses remain effective;
- That controls are in place by the required date(s);
- That emerging risks are captured;
- That significant change in the impact or probability of the risks in the risk register is identified.

Pembrokeshire CC's risk management processes result in a score calculated by combining the impact and probability scores for an event (see Annex 7a for more information). For the different types of risk, Pembrokeshire CC's current tolerance levels are:

- Political 12
- Infrastructure 8
- People & Knowledge 9
- Financial 6

The analysis of inherent risks for Cam Nesa shows that all risks presently identified are within these tolerances. After mitigation they fall further.

It will be expected that each joint beneficiary will also maintain risk registers for their part of the operation. To ensure that any significant risks from joint beneficiaries' risk registers are escalated to the operation risk register, risk management will be a standing item on the agendas of all Project Board meetings.

No risks necessitating contingency plans due to a lack of participants have been identified. On the contrary, we believe that if resources were available the operations beneficiaries would be able to meet twice the number of participants that we are targeting.

No risks have been identified in relation to our ability to secure appropriate procured delivery. We will procure an external evaluator, and in our experience there is plenty of competition in the market to assure us that we shall be able to appoint a suitable contractor within the budget set.

2B.5 Outline the Management and IT systems, processes, facilities (accommodation & equipment) that you intend to deploy. It is important also to be clear about location and communication requirements.

The corporate IT systems, processes and facilities of each joint beneficiary will be used to maintain records created by that joint beneficiary. Records held by the lead beneficiary will make use of Pembrokeshire CC's IT systems, processes and facilities. Participant records will be held using a database created using standard Microsoft Office software. Data exchange between the joint beneficiaries and the lead will make use of secure e-mail accounts where personal and/or sensitive data is involved.

It is impossible for us to list all the systems, processes and facilities owned and operated by each of the beneficiaries, their locations and the communication infrastructure and systems linking them, and probably meaningless to do so. WEFO may be assured that all beneficiaries are highly competent public bodies able to draw on specialist IT and facilities staff to resolve difficulties should they arise. The fact that the beneficiaries have multiple sites, and in the case of some have facilities to allow home or remote working, adds to the resilience of each organisation. Most beneficiaries have Business Continuity Plans, or equivalent, with others working towards their completion.

Some beneficiaries have also been visited by MVT and had their payroll systems inspected and agreed as suitable to support ESI operations. These include the lead beneficiary, Pembrokeshire CC, and also Carmarthenshire CC, City and County of Swansea and Neath Port Talbot CBC.

ECMT will upload all required documentation to WEFO Online/PPIMS.

2B.6 Draft closure plans should be provided which include a realistic timescale (at least one year) to begin preparations for the closure of the operation.

An initial Closure Plan, the responsibility for the implementation of which lies with the European Contract Management team of Pembrokeshire CC, can be found at Annex 12. This initial Closure Plan will be continually refined as the operation progresses in various ways:

- New tasks may be added, for instance as a result of new or revised guidance, new or revised legislation, or new or revised internal processes;
- Tasks may be more precisely defined, or divided into multiple tasks;
- Responsibility may be assigned to an individual or individuals rather than a team;
- Timescales will be more precisely stated (i.e. an actual date rather than a period before or after an event).

These refinements will be made by the European Contract Management Team staff themselves, but the Closure Plan will be reviewed periodically (at least annually) by the Regional Strategic Board as part of their role in managing risk.

2B.7 Provide information on how you will comply with any relevant legislation relating to your operation (e.g. equality and environmental, legislation, habitats directives, Natura sites, planning regulations etc).

As referred to in Section 1A.2.1 Cross Cutting Themes.

2B.8 Promotional activity

2B.8.1 How will you advertise and promote the opportunities / benefits that the project is offering to target participants and/or sectors;

Early in the operation's project delivery a regional launch will be held to promote the activity that will be undertaken and networking among the joint beneficiaries. This will involve partners in the operation and also external stakeholders, to ensure that groups from all sectors understand the aims of the project and the benefits that the operation will achieve. Press releases will be issued.

Further along in the operation, when it is delivering to participants it is proposed that a 'Celebration Event' be held in each local authority area. The exact format of this can be determined locally but may, for example, comprise a European themed event to which stakeholders are invited and during which the project team will give an update of progress, featuring good news case studies, and news of further actions still to be carried out, and will hopefully involve participants who can give testimonies of their experiences. This will be captured in a press release and fact sheet which can be circulated to wider partners, interest groups and other EU funded operations. The ECMT will work with sponsors to suggest that some or all of these activities take place on or near Europe Day – 9 May.

Where possible, with the consent of participants, individual success stories will be issued as press releases and circulated to joint beneficiaries.

2B.8.2 How you will work with identified stakeholders to promote the operation;

See section 2B.8.1 above.

2B.8.3 How you will publicise the results and impact of your operation;

As discussed above joint beneficiaries will hold a 'Celebration Events' towards the end of the delivery period, in order to publicise the outcomes of the operation. A Cam Nesa fact sheet will be updated to give final achievements, lessons learned and best practice identified during delivery. This will be disseminated through the media outlets, including social media and all joint beneficiary websites.

2B.8.4 How you will disseminate best practice;

As detailed in the response above via the use of facts sheets and press releases through a wide variety of media communication methods and including via all

regional education committees, regional learning partnerships, European officer networks as well as the WLGA and WEFO.

2B.8.5 How you will ensure that full acknowledgement of the funding from the European Union is clearly displayed including type of media utilised;

All published documentation whether for use with participants, contractors or publicity items will be produced in accordance with the WEFO Information and Publicity Guidance, using appropriate logos as published on the WEFO website. In accordance with this, as was the requirement under the Convergence Programme, all draft publicity items will be sent to WEFO Communications Department for approval before being produced.

2B.8.6 How you propose to 'fly the EU flag' during the week that includes 9 May;

Every year during the week that includes Europe Day, 9 May, Pembrokeshire County Council European Unit holds a European display in the reception of our main County Hall building. The aim is to make this as eye-catching as possible using flags, posters and maps and includes leaflets and good news stories about other EU funded projects delivering in the area and across Wales. The display also includes factual information about our membership of the European Union for council staff and the public to take away. Also for the entire week the European Union flag is flown on a County Hall flagpole. In addition our in-house refectory have a European Week menu and feature at least one European dish each day of the week and we feature either a European Quiz or European 'Did you Know' set of facts on our council-wide Intranet which is accessed by approximately 5,000 staff.

The central European Contract Management Team will work with joint beneficiaries to ensure that every effort is made to facilitate these and other ideas to promote Europe Day, 9 May.

2B.8.7 How you propose to ensure that participants and/or enterprises are clearly aware of the funding received from the EU;

All participants referred to the Cam Nesa operation for intervention will be told that the activity is EU funded and all paperwork that they receive will display the correct logo. Many may be invited to participate in celebrations of EU funding and the Cam Nesa operation.

All contractors who are delivering activity under the operation will also be informed to ensure that they understand that the operation is EU funded and what they will be expected to deliver in a compliant manner. All process paperwork and communication information used with contractors will have appropriate logos present.

2B.8.8 Confirmation that you will ensure that you liaise with WEFO's PR manager on any proposed launches/press releases to be arranged/issued in relation to the operation;

As stated in 2B.8.5 PCC's European Team is accustomed to liaising with the WEFO Communications Team for approval to proceed with publicity items and launches. The European Contract Management Team will work with joint beneficiaries to ensure that this procedure is followed.

Section 3 - Core Criterion: Financial & Compliance

3.1 Demonstrate:

3.1.1 How long the organisation/business has been in existence;

See Section 2.3.1.

3.1.2 When it was constituted or registered as a business or charitable body.

See Section 2.3.1.

3.2 Declare the existence or absence of conflicts of interest e.g. direct or indirect economic interests, political or national affinities, family or emotional ties, or any other relevant connection or shared interest.

Pembrokeshire County Council has a Code of Conduct which members are obliged to adhere to. This includes a Register of Members Interests and is contained in the Constitution which is published at:

<http://www.pembrokeshire.gov.uk/content.asp?nav=101,2096,1579,112,163>

3.3 Provide full details of any previous (or pending) County Court Judgements relating to any individual and/or organisation or business related to this bid. This must also include details of any criminal involvement or dissolved companies.

The County Council is a Local Authority employing over 6,000 people and with a budget for this year of over £300 million. The County Council undertakes a wide variety of functions within the County, many of which will result in legal proceedings. Many of these do not have any financial implications and are already budgeted for in terms of the cost of bringing the proceedings.

At any one time, there will always be pending child care proceedings, County Court claims and pending prosecution cases i.e. where the County Council is commencing child care proceedings in relation to children, debt recovery proceedings or prosecutions of individuals/companies/firms in relation to breaches of regulatory provisions e.g. trading standards prosecutions, animal health prosecutions. A number of prosecutions, County Court claims and child care cases will have been undertaken in the last three years. These cases do not normally involve financial claims against the Council as it is the County Council that is bringing the proceedings against others.

There are also claims constantly being made against the Council in relation to claims of negligence e.g. people injuring themselves after tripping over broken pavements. These are referred to the Council's Insurers to be dealt with. A number of these claims will have been made against the Council during the last three years and are

dealt with by the Council's Insurers under specific insurance policies taken out in that respect.

All of the above proceedings are brought by and against all Local Authorities, and they do not impinge upon the Council's budgets/accounts. They are all part of a Local Authority's normal business.

There are no pending arbitration cases involving the Council and no arbitrations involving the Council have occurred in the past three years.

There are also numerous claims made by the Council for payment of monies due to it e.g. housing possession actions for arrears of rent, claims in the County Court for non payment of monies in respect of highway advance payment notices etc. These claims usually involve a few hundred or a few thousand pounds and again do not have any impact upon the Council's accounts/budget. A number of these will be pending and a number will have been undertaken during the past three years.

There are no known major claims or legal proceedings pending against the Council in relation to payment of money and none have been made or commenced against the Council during the last three years.

3.4 Provide an initial outline breakdown of costs linked to the planned activities required for **mobilisation** (i.e. preparation for delivery) and delivery of the operation.

Organisation	Direct Staff Costs	Other Direct Costs	Total
Pembrokeshire CC – Central Team	25,510		25,510
TOTAL	25,510		25,510

3.5 The intention to implement any Simplified Cost options should be stated and explained. For example, if a flat rate option will be applied, details of the rate and the sector (e.g. higher education) it will be applied to should be provided, as well as identification of the precise elements of the operation that will operate the flat rate option. *Simplified costs* may also include options around unit costs, especially for those operations applying for ESF funding. Guidance on *simplified costs* can be obtained from WEFO's Regulations & Compliance team via your assigned WEFO contact.

We have carried out an initial assessment of the available financial data to assess whether it is feasible or desirable to make use of Simplified Cost Option (SCO). Unfortunately, the data we have from some partners is currently unrealistic and makes any attempt to reach a reasoned view on the application of an SCO unreliable.

However, we do not feel that either a lump sum or unit cost methodology is appropriate. We believe that the risks these methodologies pose are too great because of the challenging target group we shall be working with.

On the other hand, we are actively considering both the option of using 15% of direct staff costs as a proxy for the operation's indirect costs (as permitted under Art 68(1) EC 1303/2013), and the use of a flat rate of 40% on direct staff costs to calculate all other eligible costs, as permitted by Art 14(2) of EC 1304/2013.

3.6 The applicant (as lead beneficiary) should provide details of its state aid status and that of all potential/planned joint beneficiaries.

Where delivery is to be procured, we consider that there is no State Aid involved in those aspects of the operation. Two colleges, Pembrokeshire College and Gower College Swansea, have indicated that they will deliver in-house. They argue that as the participants would be college learners they fall under FE guidance that allows FE colleges to deliver this activity as a core extension to their business thus negating the need for procurement.

Pembrokeshire County Council's initial view is that if procurement is not necessary under FE guidance, the awarding of ESF via WEFO to a college there is a possibility that the ESF could constitute State Aid. We are yet to fully resolve this question.

3.7 Whether any component of the operation could potentially be classed as 'net revenue generating' under Art. 61 of the Common Provisions Regulation, initial details of income sources and forecasts should be provided.

This operation will not operate any activity which could be classed as revenue generating therefore there will be no net revenue generated.

3.8 In terms of Financial Instruments, can the operation demonstrate how the potential return of an investment (leverage) will be maximised?

This operation will not operate a Financial Instrument.

The Funding Package

3.9 Details of the proposed funding package should be provided. If the funding package is restricted by programme or EU Regulations, for example, state aid, this will need to be stated. Details should include:

Please Financial Table below. We have not included any Indirect Costs because we realise that to do so would increase the Eligible Costs and ESF beyond the reach of available funding. We recognise the need to refine these figures.

3.9.1 The level of EU structural fund financial support required and why this amount is the minimum necessary for the operation to proceed;
See spreadsheet.

3.9.2 Any joint beneficiary arrangements in respect of co-financing;
See spreadsheet.

3.9.3 Co-financing in-kind by source / type and its links to operation costs;
Not applicable.

3.9.4 Evidence of an independent 3rd party valuation of any land and building assets to be used as co-financing;
Not applicable.

3.9.5 Any other potential sources of funding that have been considered and/or may be required;
All available sources of match-funding have been investigated; those available to joint beneficiaries have been included.

1.9.6 An explanation of remaining gaps in the funding package and identified ways in which they might be met.
All available sources of match-funding have been investigated; those available to joint beneficiaries have been included.

1.9.7 Evidence that all potential funding from non-EU sources have been explored.
All available sources of match-funding have been investigated; those available to joint beneficiaries have been included.

1.9.8 Sources and timing for the introduction of co-financing/ co-financing in-kind, with an explanation of any conditions or restrictions in its availability.
Co-financing is chiefly from staff time. It is therefore proportionate to staff costs and profiled similarly to staff costs.

Possible supporting documentation could include:

- Electronic copies of initial outline projections e.g. Excel files;
- Confirmation of any co-financing;
- Development appraisals for capital operations.

Appendix 2

CAM NESA

	Direct Costs			Flat rate 15%	Total costs	Financing		
	Staff Costs	Other	Procured Delivery			Total Direct Costs	Match Funding	ESF
Neath Port Talbot						353,526	824,894	1,178,419
Swansea						549,051	128,1120	1,830,171
Ceredigion						58,921	137,482	196,403
Carmarthenshire						392,861	916,676	1,309,538
Pembrokeshire						218,073	508,838	726,911
Pembrokeshire CC Central Costs						141,853	330,990	472,843
TOTAL						1,714,286	4,000,000	5,714,286

**Note: Total costs include an element for mobilisation costs*

Section 3A: Further Financial Criterion

Value for Money

This section is divided into two parts. The first, providing a Cost Benefit Analysis of the operation, focuses on proving that our proposal represents optimum value for money for the delivery of the West Wales and the Valleys ESF Operational Programme 2014-2020. The second part of this section provides further financial details that build on the initial outline provided above.

3A.1 Cost Benefit Analysis (CBA)

3A.1.1 Cost Benefit Analysis

Section 2.1.2 provides a subjective or qualitative assessment of three options for delivery, the “Cam Nesa” model of tailored interventions aimed at specifically addressing the barriers faced by each individual young person, a model of generalised interventions in which only barriers and problems faced by all NEET young people are addressed, and a “do nothing” option. It concludes that the “Cam Nesa” option is the preferred option.

The identification of the preferred option based on a quantitative analysis is based on a Cost Benefit Analysis attached at Annex 13. This also concludes that the “Cam Nesa” or tailored intervention option is the preferred option. The Annex itself sets out the assumptions made in carrying out the analysis. Appendix 1 to this Annex is an extract from an academic study²⁶ by the University of York to assess the lifetime cost of NEET status, setting out the methodological basis for the study. Appendix 2 is a spreadsheet showing the calculation of figures shown below, and also providing a sensitivity analysis and adjustment for optimism bias (also see below). An electronic copy of this spreadsheet accompanies this Business Plan so that WEFO or others may carry out further analysis should the need arise.

3A.1.2 Optimism Bias

Steps have been taken in the design of this operation to minimise the recognised tendency in all project management for optimism to cloud judgement. In line with the recommendations in the HM Treasury Green Book, we have taken various steps to minimise optimism bias in the estimates we present in this Business Plan. These are:

²⁶ Coles *et al* (2010) “Estimating the lifetime cost of NEET: 16-18 not in education, employment or training” Available: https://www.york.ac.uk/media/spsw/documents/research-and-publications/NEET_Final_Report_July_2010_York.pdf (Accessed 27.8.2015)

- A suitable Senior Responsible Officer has been designated overall management responsibility;
- Suitably competent and experienced managers have been identified for the key roles both in terms of managing delivery but also in terms of the management of EU funds;
- Joint beneficiary roles have been defined in a Service Level Agreement (see Annex 14);
- Management structures based on experience and best practice have been designed;
- Performance management systems have been established; and
- The operation has been designed on a modular basis to simplify management. It is accordingly composed of a number of discrete projects managed at Unitary Authority level and at joint beneficiary level.

We have also applied a 25% increase in costs and 25% reduction in outcomes to the preferred Option C (see Annex 13 (b) Appendix 2) and this still provides the best value for money.

3A.2 Operation Costs

3A.2.1 Detailed Breakdown of Operation Costs

➤ A detailed breakdown of operation costs linked to all identified activities & indicators. These need to be fully cross-referenced with the Delivery Profile.

Please refer to Annex 1 - Financial Delivery Profile and Annex 2 Delivery Profile Indicators.

Please refer to beneficiary letters of commitment and match funding which may be found at Annex XX.

3A.2.2 Underlying Assumptions

All beneficiaries have used their standard estimating assumptions with regard to likely salary and price increases. Where individual members of staff are not employed full time on Cam Nesa it is assumed that their actual cost will be calculated through timesheet data or by a specified percentage of their time.

3A.2.3 Indirect Costs

All beneficiaries of this operation are making use of either the FR15 Simplified Cost option. None are calculating indirect costs by other means.

3A.2.4 Credit Arrangements

Pembrokeshire County Council operates a positive cash flow. For its borrowing requirements it has access to the Public Works Loans Board (PWLB), market loans

and an overdraft facility. For further information please refer to the Council's approved Treasury Management Governance arrangements for 2015/16 which includes "Policy on Borrowing". This may be found at Annex 15.

3A.2.5 Capital Build, including Self-Build

This operation does not include any capital build, whether self-build or otherwise.

3A.2.6 Use of resources across more than one operation

It is possible that resources may be used to deliver activities against more than one operation. If this is the case, timesheets will be used to record staff time against each individual operation and this will be agreed with WEFO before delivery commences.

Supporting Documentation could include, but is not limited to:

- Full Cost Benefit analysis;
- Signed and audited Financial statements (last 3 years);
- Relevant cash flows;
- Electronic copies of projections e.g. Excel files;
- Final confirmation of all co-financing;
- Evidence supporting any credit arrangements.

Section 3B: Further Financial Criterion

Long Term Sustainability

This section describes our continuation or exit strategy, setting out what will happen when the ESF financial support currently sought comes to an end.

Plans to Secure Future Financial Support

It is anticipated that further financial support will be required as an on-going need to address the issues of young people who are NEET. After all, it is unrealistic to expect that addressing the needs of this group in one generation will remove the needs of this group in later generations, although an inter-generational impact may arise if the next generation have better role models to follow. It is expected that some of the future financial support needed will be provided by local authority education departments and further education colleges. If these core sources of funding can be supplemented by other additional resources then it would of course be beneficial to do so.

Operation Closure

However successful Cam Nesa becomes, it will only ever deal with young people in the targeted age group during the period in which the operation runs. Cam Nesa will not be able to meet the needs of younger children who may later in their lives become NEET. Therefore, it is inevitable that a continuing need will exist for the type of activity provided by Cam Nesa.

Although the activity will still be required, it is appropriate to describe how closure of the ESF funded operation will be managed, since this must be done whether the activity continues (funded through other sources), or not.

We shall follow any WEFO Guidance issued for the closure of 2014-2020 operations. We shall also take account of the findings of an Internal Audit report prepared by Pembrokeshire CC on managing the transition between programming periods, specifically with reference to staff contracts.

An initial operation closure plan has been prepared (Annex 12). This will be continually updated throughout the course of the delivery of Cam Nesa. Arrangements will be made for the annual closure of accounts, for which we anticipate further guidance from WEFO. The bulk of closure work will be carried out by administrators and finance staff in the lead beneficiary's European Contract Management Team in association with our joint beneficiaries. Any work associated with the closure that needs to be undertaken after the operation end date (by which time all ECMT staff will have ended their contracts) will be carried out by remaining core funded European and finance staff in the Regeneration and Financial Services Divisions of Pembrokeshire CC.

We shall expect further guidance to issue in relation to the complications involved in Brexit, the administrative arrangements of HM Treasury's financial guarantee to EU funded projects and any additional requirements of the European Commission or European Court of Auditors. We shall await and follow any guidance issued by WEFO or other bodies in relation to these matters.