

# Chapter 11b: European Social Fund (ESF) Requirements 2014 to 2020 (England Only)

## Contents

Introduction .....	2
Document Retention .....	5
Electronic Document Retention .....	6
Retained Documentation .....	8
ESF Audit Requirements.....	14
Article 125 Financial Verification Visits .....	15
Article 127 Audits.....	16
ESF 2014 to 2020: Marketing and Publicity.....	17

<b>ESF Marketing and Publicity – Requirements</b> .....	17
<b>Use of the ESF 2014 to 2020 Logo</b> .....	19
<b>Other Logos</b> .....	22
<b>Displaying an ESF 2014 to 2020 Poster</b> .....	23
<b>Informing Participants of European Union Support</b> .....	23
<b>List of ESF Provision on ESIF Public Database</b> .....	24
<b>Providing Good News Stories/Case Studies</b> .....	25
<b>Marketing and Public Relations (PR) Planning</b> .....	28
<b>Cross Cutting Themes for ESF and Match Provision</b> .....	29
<b>Evaluation</b> .....	30
<b>Electronic Signatures</b> .....	32
<b>Annex 1: ESF 2014 to 2020: Good News Story template and consent form</b> .....	33

# Introduction

## Living with COVID-19

This guidance has been updated to include the interim arrangements that DWP, as CFO for our ESF 2014 to 2020 Programme, has put in place to allow you to continue to deliver provision now that all COVID-19 restrictions have been lifted and the updated government advice has progressed to ‘Living with COVID-19’.

A blended delivery model is acceptable to the department longer term. However, please note, that whilst the department supports a blended delivery model for all ESF funded provision, this must be based on participant need and the preferred method of delivery is face-to-face, where possible. Our Performance Managers will continue to monitor whether remote delivery is being overly relied upon and will discuss this with you during your monthly CPR meetings.

Your records should clearly state why remote delivery was the most appropriate and an email audit trail should exist to demonstrate paperwork was completed in agreement with the participant if no wet signature has been obtained.

As all COVID restrictions have been lifted and the updated government advice has progressed to 'Living with COVID-19' it is no longer appropriate for ESF-related paperwork, completed when delivering provision remotely, to contain 'COVID-19' in lieu of a signature from 7 May 2022.

We are now asking that 'COVID-19' is replaced by 'Remote delivery' in the signature box for those participants who cannot be seen face to face. The 'COVID-19' wording will not be accepted on any ESF1420 Initial and End forms or Annex 1: ESF 2014 to 2020 Good News Story Template and Consent Form submitted from 7 May 2022.

Alternatively, you now also have the option of using an electronic "wet" signature, obtained via an electronic signature encrypted software app which can be used to collect a signature for any ESF documents where a wet signature would normally be collected. This will allow the participants to electronically sign documents using a login and password process, where the signature can be tracked, and the document can be saved in a PDF format for audit. This will apply whether the participant is seen face to face or remote delivery is undertaken. For more information, please see section 72 to 75.

When you are delivering face to face, a wet signature must be obtained, and retrospective signatures should be attained when the participant is next seen in person and such form/s retained on file for audit.

The majority of current Generic Provider Guidance – Chapter 11b, Chapter 12 ESF Declaration and Annex 1: ESF 2014 to 2020: Good News Story Template and Consent Form will still apply and are to be used in conjunction with the 'living with COVID-19' period arrangements cited in the text boxes in this and other applicable chapters.

1. European Social Funding (ESF) 2014 to 2020 will operate differently to previous funding periods. ESF, the European Regional Development Fund (ERDF) and part of the European Agricultural Fund for Rural Development (EAFRD), have been brought together to form the European Structural and Investment Funds (ESIF) Growth Programme.
2. This chapter provides information about mandatory requirements that apply to ESF and match funded provision in England for 2014 to 2020 provision. Failure to comply with these requirements could result in the withdrawal of ESF funding.
3. Guidance for ESF and match funded provision that went live prior to the ESF 2014 to 2020 provision, is provided in Chapter 11a of this guidance.
4. The ESF requirements outlined in this chapter apply to you and your whole supply chain throughout delivery. It is your responsibility to adhere to these requirements and to ensure your supply chain does the same. You are ultimately accountable for the ESF compliance of your contract, including your sub contracts. Failure to comply with any of the ESF requirements can result in significant financial penalties.

5. Your Department for Work and Pensions (DWP) Performance Manager (PM) is responsible for the implementation and delivery of these contractual requirements. The PM will ensure that performance and compliance with the regulatory requirements is managed in a formal, structured setting.

6. Your PM will be assisted by a Performance Compliance Officer (PCO) who will be responsible for a programme of contract compliance monitoring. They will ensure that contracts meet European Union regulatory requirements.

## Living with COVID-19: PCO checks

Due to DWP resource pressures during COVID-19, PCO compliance checks were paused. Checks have returned to business as usual and may be undertaken remotely or in person.

## Document Retention

7. The Document Retention date may vary but providers can be expected to retain all records relating to their participants and all documents relating to ESF 2014 to 2020 provision for up to 10 years after the programme ends and their final ESF claim is paid. The date may be earlier, depending on what date your provision commenced, and could be subject to change, but in all instances, you will be notified of the Document Retention end date at the end of the project. The period will be dependent on the date at which the final claim is paid. Please keep up to date with the Managing Authority guidance on this at: [European Social Fund document retention guidance on GOV.UK](#). For further details, please refer to Section 3.10 of [European Structural Investment Fund Branding and Publicity Requirements](#).

8. Up until this document retention end date, although Brexit transition completes in 2024, providers may also be subject to visits by the DWP, ESF Managing Authority, ESF Audit Authority, National Audit Office, European Commission or the European Court of Auditors.

9. There are specific rules that apply to the retention of documents, these are detailed at paragraph 14. The list of documents that must be retained are also detailed at paragraph 19. This list may not be exhaustive and could be subject to further review.

10. Where an organisation within your supply chain ceases to trade or is no longer doing business with you, it is your responsibility to recover all relevant and original documents held by the sub-contractor. Those documents are as specified in the table at paragraph 19 and must be retained for the full retention period.

11. Where you cease to trade or will no longer be doing business with DWP, you should discuss retention of documents with your DWP PM.

## **Electronic Document Retention**

12. European Union regulations allow for documents to be retained as either the original paper copies or as an electronic copy of the originals. The regulations allow for the electronic storage of documents provided that they are stored on a recognised and accepted data carrier (This refers to any document storage and retrieval software that providers may purchase and use for, for example compact disc read-only memory (CD ROM), Hard Disk or Magnetic Disk), are certified as being copies of the original, meet with what is set out within your contract terms and conditions and are auditable.

13. For each data carrier used, you must retain a signed declaration that the documents held within the data carrier are certified as being true copies (conforming to) the originals. The ESF Declaration must be written on headed paper to satisfy this requirement.

14. Minimum requirements associated with completion of an ESF declaration are:

- all declarations must be made available on request
- documents can be certified as true copies of the original document either individually or as a group of documents; however, a declaration will be required each time documents(s) are copied and retained for audit purposes
- the declaration can be kept as an electronic or paper copy. The declaration can be included on the electronic copy of the documents and stored electronically. If the document(s) are certified using a paper copy it is extremely important that it is stored with the appropriate stored data carrier
- electronic copies of original documents must be kept for the same length of time as paper copies. For further information on Document Retention see paragraph 7
- the signature can be original or a scanned reproduction of the original wet signature
- the electronic copies must be reliable for ESF and DWP audit purposes through to the provider's document retention end date. For example, they must be:
  - stored in such a way that they are safe and cannot be modified
  - can be effectively retrieved
  - accessible in a readable format

15. Note: DWP and The National Archives recommend that electronically held data is migrated onto new formats every 5 years to ensure the data remains readable and usable.

# Retained Documentation

## Living with COVID-19: Signatures on Documents

As all COVID-19 restrictions have been lifted and the updated government advice has progressed to 'Living with COVID-19' it is no longer appropriate for ESF-related paperwork, completed when delivering provision remotely, to contain 'COVID-19' in lieu of a signature from 7 May 2022.

We are now asking that 'COVID-19' is replaced by 'Remote delivery' in the signature box for those participants who cannot be seen face to face. The 'COVID-19' wording will not be accepted on any ESF1420 Initial and End forms nor the Annex 1: Good News Story Template and Consent Form submitted after 7 May 2022.

Please note, that whilst the department supports a blended delivery model for all ESF funded provision, this must be based on participant need and the preferred method of delivery is face to face. Our Performance Managers will continue to monitor whether remote delivery is being overly relied upon and will discuss this with you during your monthly CPR meetings.

Your records should clearly state why remote delivery was the most appropriate and an email audit trail should exist to demonstrate paperwork was completed in agreement with the participant if no wet signature has been obtained.

All ESF documents generated from 7 May 2022 which require a participant's signature, as per section 18 to 29 below should be annotated 'Remote delivery' in the signature box to confirm the participant was enrolled during this period. The date should be included. All case notes held on file must reflect the conversations which have taken place with participants and reflect the information on the documents. Email evidence for audit should be gathered and retained to demonstrate the individual's participation on the programme.



If the signature box is annotated 'Remote delivery' you should obtain a signature retrospectively when they are next seen in person, and such forms retained on file, for audit. When you are delivering face to face, a wet signature must be obtained.

Alternatively, you now also have the option of using an electronic "wet" signature, obtained via an electronic signature encrypted software app which can be used to collect a signature for any ESF documents where a wet signature would normally be collected. This will allow the participants to electronically sign documents using a login and password process, where the signature can be tracked, and the document can be saved in a PDF format for audit. This will apply whether the participant is seen face to face or remote delivery is undertaken. For more information, please see section 72 to 75.

16. You must ensure that you have robust systems and controls in place to maintain and monitor access to documentation throughout the retention period.

17. All documents (including any electronic information) must be readily accessible to auditors and DWP upon request and stored in accordance with what is set out within your contract terms and conditions and [DWP Security Policies and Standards](#). Electronic documents should be retained in accordance with BS10008 (This is the British Standard that outlines best practice for the implementation and operation of electronic information management systems, including the storage and transfer of information). To support audit activity, it is recommended that a separate file of documentation for each individual participant, is linked to a specific Contract Package Area number and arranged in a filing system that will enable its effective retrieval. A data destruction certificate should be sent to your DWP PM when data is destroyed and at the end the contract and confirmation of destruction provided to the Departmental Records Officer (DRO).

## **Living with COVID-19 Eligibility Checks and Evidence**

As per the following sections 18 to 29 below, eligibility should still be checked, even if you cannot obtain physical copies of documents. Passport numbers or a note to confirm what evidence the participant has confirmed they have to demonstrate right to live and work in the UK, should be noted on or within provider records where required for audit purposes.

All reasonable steps must be taken to ensure a participant meets the eligibility for the programme – as per your existing contractual obligations, you would be liable for any fines should you enrol an ineligible participant, as the audit risk is yours.

As all COVID restrictions have been lifted and the updated government advice has progressed to 'Living with COVID-19' it is no longer appropriate for ESF-related paperwork, completed when delivering provision remotely, to contain 'COVID-19' in lieu of a signature from 7 May 2022.

When you are delivering face to face, a wet signature must be obtained, and retrospective signatures should be attained when the participant is next seen in person and such form/s retained on file for audit.

Alternatively, you now also have the option of using an electronic “wet” signature, obtained via an electronic signature encrypted software app which can be used to collect a signature for any ESF documents where a wet signature would normally be collected. This will allow the participants to electronically sign documents using a login and password process, where the signature can be tracked, and the document can be saved in a PDF format for audit. This will apply whether the participant is seen face to face or remote delivery is undertaken. For more information, please see section 72 to 75.

Whilst the department supports a blended delivery model for all ESF funded provision, this must be based on participant need and the preferred method of delivery is face to face, where possible. Our Performance Managers will continue to monitor whether remote delivery is being overly relied upon and will discuss this with you during your monthly CPR meetings.

Your records should clearly state why remote delivery was the most appropriate and an email audit trail should exist to demonstrate why you could not obtain physical copies of documents.

18. A full audit trail of the participant's engagement with the provider should be retained as Auditors will scrutinise down to the level of an individual participant. Documentation must show that payments claimed in respect of an individual participant was eligible in accordance with the contract terms and conditions. The participant file, either in hard copy or electronic format, must also contain evidence that the participant was made aware that the provision is part funded by ESF.

19. The table below lists the documentation that must be retained as a minimum to meet audit requirements until the provider's document retention period.

**No. Document/Information**

---

1 Participant Action Plan(s)

---

2 Enrolment / Referral forms (signed)

---

**No. Document/Information**

---

3 Timesheets / evidence of attendance

---

4 Certificates of educational achievements (if appropriate)

---

5 Sustainable Development Policy and Action Plans

---

6 Equality and Diversity Policy and Action Plans

---

**No. Document/Information**

---

7 Marketing and Publicity documents including Marketing/Communication plans and products produced to promote ESF to participants, screen shots of web pages displaying the ESF logo and evidence of posters with proof of location for audits post-delivery

---

8 Supporting information for job and sustainment claims as detailed in programme specific guidance

---

9 Evidence to support the assessment and decision on eligibility for the ESF programme.

---

## No. Document/Information

---

10 Document Retention Policy and Plan

---

20. You should submit a document retention policy and plan to your DWP PM within 4 weeks from the provision starting. This will be monitored and reviewed by your DWP PM.

## **ESF Audit Requirements**

### **Living with COVID-19: ESF Audit Requirements**

The MA will undertake either an On the Spot Visit (OTSV) at a Provider premises or a desk-based audit remotely. We will ask Providers to send participant information electronically whilst adhering to data security requirements. We will be in touch directly with those Providers selected for audit to support them with the audit requests.

21. You and your sub-contractors are subject to audit controls and review. The following is a list of the bodies which require access for audit purposes – it is not exhaustive:

- ESF 2014 to 2020 Audit Authority (which forms part of Government Internal Audit Agency)
- the European Court of Auditors
- the European Commission's Auditors
- the National Audit Office
- other bodies as required by or on behalf of DWP/European Commission

22. It cannot be emphasised enough that failure to meet audit requirements results in a high financial risk for both providers and DWP, as funds used inappropriately or for ineligible participants or purposes are recoverable.

## **Article 125 Financial Verification Visits**

23. All DWP ESF claims are subject to random sampling as part of Article 125 Financial Verification Visits, which take place on a quarterly basis. The purpose of a Financial Verification visit is to test the eligibility of expenditure claimed by your organisation for delivering ESF provision. These visits are undertaken by staff from the ESF Managing Authority. If your organisation has been selected for sampling, you will be notified by the DWP Co-Financing Organisation who will work with you to agree the visit arrangements.

24. Article 125 is about ensuring that expenditure declared by your organisation, complies with European Community and National rules. If your claims are found to feature expenditure which does not comply, then affected monies may have to be repaid. All organisations and their supply chain/subcontractors in receipt of ESF, or being used as match funding for the ESF 2014 to 2020 programme, will need to comply with European Union regulatory requirements.

# Article 127 Audits

25. The ESF Audit Authority is required by the European Commission to undertake an annual Audit of Operations under Article 127 CPR 1303/2013.

26. Article 127 Audits involve examining a sample of claims from ESF and match certified expenditure. The number of claims to be examined and the specific items selected is determined by monetary unit sampling, a statistical selection methodology that has been laid down by the European Commission. In the event your organisation's expenditure has been selected for sampling, DWP ESF Co-Financing Organisation representatives will contact you to arrange the auditors visit to your premises and inform you of the expenditure items to be examined.

27. The audit approach will include inspection of detailed records at your premises to verify the claimed expenditure and related activity, substantive testing i.e. at transaction level of participant and/or other supporting records as appropriate.

28. Following the audit visit, you will be allowed a brief period of time to provide additional supporting evidence. Specific timings will be based on the date auditors issue their initial findings. At the end of this period if your claims are found to feature expenditure which does not comply then affected monies may have to be repaid.

29. The scope of Article 127 audit visits includes, examining:

- eligibility of participants
- compliance with Community and National rules
- compliance with document retention requirements/standards



- confirmation that expenditure declared corresponds to accounting records and supporting documentation held
- whether your provision meets the selection criteria and objectives of the programme
- compliance with Publicity and State Aid requirements

## **ESF 2014 to 2020: Marketing and Publicity**

30. There are a number of contractual requirements for all ESF funded and match funded provision in terms of marketing and publicity. These apply to you and your sub-contractors and failure to meet some of these requirements could result in significant financial penalties.

31. You need to develop and implement a Marketing and Publicity Plan which details the activities you are undertaking to satisfy the ESF regulatory requirements. ESF 2014 to 2020 match providers will need to review and update this plan to accommodate the new marketing and publicity requirements now outlined within this updated Chapter and the [European Structural Investment Fund Branding and Publicity Requirements](#). This plan will be monitored and reviewed by your DWP PM on a regular basis.

## **ESF Marketing and Publicity – Requirements**

**Living COVID-19: Informing Participants of European Union Support**

Regarding sections 32 and 43 to 46 below, the '[How the European Social Fund is helping you](#)' information leaflet can be emailed to participants using the published electronic PDF version which includes the DWP and ESF Logos. If a participant does not have an email address you must ensure the participant is aware of the information the form contains verbally and arrange to post it to them at the earliest opportunity.

As all COVID restrictions have been lifted and the updated Government advice has progressed to 'Living with COVID-19' it is no longer appropriate for ESF-related paperwork, completed when delivering provision remotely, to contain 'COVID-19' in lieu of a signature from 7 May 2022.

When you are delivering face to face, a wet signature must be obtained, and retrospective signatures should be attained when the participant is next seen in person and such form/s retained on file for audit.

Alternatively, you now also have the option of using an electronic "wet" signature, obtained via an electronic signature encrypted software app which can be used to collect a signature for any ESF documents where a wet signature would normally be collected. This will allow the participants to electronically sign documents using a login and password process, where the signature can be tracked, and the document can be saved in a PDF format for audit. This will apply whether the participant is seen face to face or remote delivery is undertaken. For more information, please see section 72 to 75.

Whilst the department supports a blended delivery model for all ESF funded provision, this must be based on participant need and the preferred method of delivery is face to face, where possible. Our Performance Managers will continue to monitor whether remote delivery is being overly relied upon and will discuss this with you during your monthly CPR meetings.

Your records should clearly state why remote delivery was the most appropriate. All case notes held on file must reflect the conversations which have taken place with participants and reflect the information on the documents.

Email evidence for audit should be gathered and retained to demonstrate the individual's participation on the programme.

32. You and your sub-contractors must have specific ESF publicity measures in place which include, but are not restricted to, the following:

- display the [Section 2.1 ESF 2014 to 2020 Logos](#) on all marketing and publicity products
- display an [Section 3.3 ESF 2014 to 2020 Poster](#) in a prominent place
- [Section 3.8 Informing Participants](#) taking part in ESF 2014 to 2020 funded or match funded activity about the support they are receiving from the European Union. For example, using the leaflet ESF2020
- supplying provider and provision details for inclusion in the ESIF public databases. (This has yet to be produced for 2014-2020 provision but it will be a requirement at a later date)
- providing DWP with Good News Stories/Case Studies on a regular basis
- retention of Marketing and Publicity documentation including Marketing/Communication plans, products produced to promote ESF to participants, screen shots of web pages displaying the ESF Logo and evidence of A3 posters with proof of location until the provider's document retention end date. Providers must also retain for audits post-delivery

## Use of the ESF 2014 to 2020 Logo

33. All printed documents and publications you produce must acknowledge and refer to ESF 2014 to 2020 by displaying the correct logo in a visible and prominent position. Further information can be found in [Section 2 and Section 3.4](#) of the ESIF Branding and Publicity Guidance. Printed documents and publications include, but are not restricted to:

- general advertisements
- job advertisements and notices
- leaflets, brochures, flyers and posters
- any forms and Action Plans
- case studies
- exhibition banners and display panels
- invitations
- business cards
- promotional items
- newsletters
- stationery
- letterheads and compliment slips
- reports and papers
- programme documentation – for example timesheets, induction material etc.
- procurement material
- job descriptions

34. All electronic material produced, must also acknowledge and refer to ESF 2014 – 2020 by displaying the correct logo, ensuring it is visible and in a prominent position. Further information can be found in [Section 2 and Section 3.5](#) of the ESIF Branding and Publicity Guidance. This includes but is not limited to:

- websites
- e-newsletters
- presentation slides
- press notices
- email footers and signatures
- audio visual material including films, video, DVDs, CD Roms
- social media tools including Facebook and Twitter

35. [Section 5](#) of the ESIF Branding and Publicity Guidance gives details on a variety of downloadable logo formats which you can use on any documents and electronically.

36. Note: For all marketing and publicity material you produce, you must obtain clearance by emailing material to your DWP PM and the central inbox email address DWP CEP ESF 14-20 Marketing & Publicity [cepesf14-20.marketing.publicity@dwp.gov.uk](mailto:cepesf14-20.marketing.publicity@dwp.gov.uk) to ensure that it is approved from an ESF perspective. This requires you to make a draft version of all material prior to its final publication and issue. Please ensure that you keep evidence of the authorisation you receive on any marketing material as this will be required as part of your Annual Regulatory Requirements review by your PCO.

# Other Logos

37. DWP Logo. Any marketing and publicity materials intended for claimants or customers of the service should also include the 'partnership' version of the Department for Work and Pensions logo. The colour, monochrome or white version should be used accordingly. The size should be equal to that of the ESF Union emblem and any other featured logo.

- To access our [Brandcentre – HH Global](#) online portal for branding and logo guidelines you will need to create an account. As a Provider, you can register yourself, however your registration will be verified by a site administrator, as external parties do not have a DWP email address. Use the link to access the Brandcentre, information on How to Register, User Guide, Login Guide, Support and Terms and Conditions.

38. Funded by UK Government. Reference is made to this logo within the [European Structural Investment Fund Branding and Publicity Requirements](#).

Unless you have been otherwise instructed, there is no requirement to include this logo on any of your publicity material.

39. ESIF Logo. If, as a provider for ESF 2014 to 2020, you are in receipt of more than one stream of ESIF, e.g. you are in receipt of ERDF and ESF, you should use the ESIF logo rather than the ESF logo. Further information can be found in [Section 2.1](#) of the ESIF Branding and Publicity Guidance.

# Displaying an ESF 2014 to 2020 Poster

40. An ESF poster must be displayed at each location where the ESF funded/match funded provision is being delivered (including main training rooms) to participants. It should be readily visible to the public, such as the in the entrance area of a building.

41. This poster must display information about your provision, including financial support from the European Union. It must be at least A3 size (portrait or landscape) and include the following information:

- name of provision/project
- name of ESIF Funding Stream – ESF
- a brief description of the activity the ESF is supporting
- the full ESF logo

42. To assist you, example poster templates can be found within the ESIF Branding and Publicity Guidance [Section 3.3](#). Alternatively, you can develop your own designs, as long as European Union regulations outlined in the Regulations and ESIF Branding and Publicity Guidance, are met.

## Informing Participants of European Union Support

43. All participants of ESF/ESF match funded provision must be informed about the support they receive, in writing, from the European Union from the start of their activity.

44. This must be carried out from the initial stages of each individual agreeing to participate on any ESF funded/match-funded provision. You can use a DWP produced leaflet (ESF2020) which explains ESF funding. This form also mentions that whilst attending provision, they may receive help towards the cost of childcare and travel expenses.

45. Copies of the ESF2020 leaflet can be ordered through [APS Group](#) where you will also find information on obtaining this leaflet in other formats.

46. You must also remind participants of European Union and ESF support throughout their time on provision and have evidence to support this audit requirement. Further information on these requirements can be found at [Section 3.8](#) of the ESIF Branding and Publicity Guidance.

## List of ESF Provision on ESIF Public Database

47. It is a requirement that a list of provision that receives support from European Funds is published online. [Section 3.9](#) of the ESIF Branding and Publicity Guidance outlines this. This list has not yet been produced for 2014 to 2020 provision, so no action is currently required by you, but it may be at a later date. When the list is compiled, we will provide you with further information and a link will be made available in this chapter.



# Providing Good News Stories/Case Studies

## Living with COVID-19: Signatures on Good News Stories

As all COVID-19 restrictions have been lifted and the updated government advice has progressed to 'Living with COVID-19' it is no longer appropriate for ESF-related paperwork, completed when delivering provision remotely, to contain 'COVID-19' in lieu of a signature from 7 May 2022.

We are now asking that 'COVID-19' is replaced by 'Remote delivery' in the signature box for those participants who cannot be seen face to face. The 'COVID-19' wording will not be accepted on any Annex 1: ESF 2014 to 2020 Good New Story Template and Consent Form submitted from 7 May 2022.

The [Annex 1: ESF 2014 to 2020: Good News Story Template and Consent Form](#) which requires a participant's signature, as per section 49 below should be annotated 'Remote delivery' for those participants that cannot be seen face to face in the signature box to confirm the participant has given consent during this period and the date should be included. All case notes held on file must reflect the conversations which have taken place with participants and reflect the information on Annex 1. Email evidence for audit should be gathered and retained to demonstrate the individual's participation on the programme.

Alternatively, you now also have the option of using an electronic "wet" signature, obtained via an electronic signature encrypted software app which can be used to collect a signature for any ESF documents where a wet signature would normally be collected. This will allow the participants to electronically sign documents using a login and password process, where the signature can be tracked, and the document can be saved in a PDF format for audit. This will apply whether the participant is seen face to face or remote delivery is undertaken. For more information, please see section 72 to 75.

Please note, that whilst the department supports a blended delivery model for all ESF funded provision, this must be based on participant need and the preferred method of delivery is face to face. Our Performance Managers will continue to monitor whether remote delivery is being overly relied upon and will discuss this with you during your monthly CPR meetings.

Your records and Part 4 of the Annex 1 should clearly state why remote delivery was the most appropriate and an email audit trail should exist to demonstrate paperwork was completed in agreement with the participant if no wet signature has been obtained. If the signature box is annotated 'Remote delivery' you should obtain a signature retrospectively when they are seen in person, and such form/s retained on file, for audit. When you are delivering face to face, a wet signature must be obtained.

48. DWP regularly requires information on participants whose individual stories can be celebrated. This information will be used in marketing and publicity products which help celebrate the success and raise awareness of ESF provision, as well as DWP/Jobcentre Plus.

49. Consent must be obtained from each participant who agrees to their details being shared before any story can be published. The [Annex 1: ESF 2014 to 2020: Good News Story Template and Consent Form](#) must be signed in all cases, for audit, data protection and General Data Protection Regulations (GDPR) purposes.

50. Once completed, a copy of the [Annex 1: ESF 2014 to 2020: Good News Story Template and Consent Form](#) should be shared with your DWP PM at the monthly Contract Performance Review (CPR). They will ensure you have obtained all the appropriate information required and that the information is forwarded to the DWP ESF Policy Team. Upon receiving clearance from the Department, you may then publicise your good news story.

51. Following the new email relaxations, you now also have the option to use unencrypted email when sharing European Social Fund and European Social Fund (ESF) Match Funded Provision Good News Stories with DWP. (Please see [Generic Provider Guidance Chapter 8 – Information Security](#)).

52. To mitigate the risk of data being lost, DWP Operational Security has restricted the number of good news stories that may be transmitted via the unencrypted email process to a maximum of one Annex 1 per email. [Generic Provider Guidance Chapter 8 – Information Security](#).

53. Please ensure you use clear and concise email header titles so it is clear to the recipient your email's intent. The standard wording in the email 'Subject Box' will be:

Good News Story – Programme Name – Provider Name

For Example:

Good News Story – ESF – Sample

54. An additional layer of data protection is necessary if you wish to then share good news stories with Local Enterprise Partnerships (LEPs). All personal data must be anonymised in order for the LEPs to receive and subsequently publicise good news stories. To clarify the definition of personal data for the basis of anonymisation; this is any information that on its own or with other pieces of information may directly or indirectly identify a living individual. This could be a name, e-mail address or any characteristics such as post code or address that with other information could identify the individual or a collection of characteristics that could in combination indicate an individual. Annex 1 will need to be returned to the Department to evidence the removal of personal data. Once the good news story has received clearance from the Department, you are then free to share with LEPs.

55. DWP may publicise your good news story/case study in such things as ministerial speeches, newsletters, magazines, newspapers or television etc. Note: The relevance of the story will be subject to DWP's Press Office clearance prior to publication.

56. Reference to ESF funding must be used within the body of the narrative of your good news story for all European Union funded provision. As an example, if you quote the name of the organisation that has helped someone you should also add 'which is financed by the European Union'. For match funded provision, an example would be, if you quote the name of the provision (WHP/JETS/NEA2) you should also add 'which is commissioned and financed by the Department for Work and Pensions and deemed to be a European Social Fund match funded programme.' Your DWP PM will check for reference to this.

57. DWP does not stipulate how many ESF good news stories you are required to produce. As a guide, you should aim to provide at least one each month which you can discuss with your DWP PM at each CPR.

58. Further information on producing press releases can be found in the Media and PR Activity section of the ESIF Branding and Publicity Guidance, Section 3.6.

## **Marketing and Public Relations (PR) Planning**

59. You will need to work closely with DWP ESF Policy to ensure that ESF marketing and PR activities are co-ordinated. This is to achieve complementary timing of activity and consistency of message.

60. There will be times when elements of the marketing plans will need changing. For example, you may need to be flexible on timing if there is a potential clash, as this might lead to confusion for the target audience. Additionally, you might need to incorporate ministerial involvement in PR activity.

61. Further information relating to marketing and publicity can be found in [Generic Guidance Chapter 9 Marketing and Participant Communications](#). Note: this Chapter has not yet been updated to take on board the new ESF 2014 to 2020 Marketing and Publicity requirements.

## **Cross Cutting Themes for ESF and Match Provision**

62. You and your sub-contractors are required to take action to support ESF cross cutting themes of Gender Equality and Equal Opportunities and Sustainable Development. You should ensure that you and your subcontractors are aware and fully understand the requirements. The following are some key activities that you are required to carry out:

- Develop a Diversity & Equality Delivery Plan, within 26 weeks of the contract starting, which must be available on request. This plan must comply with the Public Sector Equality Duty and further details are available within the Terms and Conditions of your contract. This plan is then checked annually, by the PCO
- provide workforce monitoring data for the workforce involved in delivery of the Contract. Further details are outlined within Schedule 8 of the Contract Terms and Conditions
- ensure a discrimination complaints procedure is in place. Grievance Policy guidance can be found in Generic Guidance Chapter 2 Delivering DWP Programme Provision

- ensure an equal opportunities policy and implementation plan for that policy is in place for staff and participants;
- ensure buildings etc. comply with the requirements of the [Equality Act 2010](#)
- support and be involved in any equality analysis assessments undertaken by the Department
- have a sustainable development policy and implementation action plan in place, which must be submitted to your DWP PM within 26 weeks of the contract starting. Guidance on the requirements for sustainable development can be found in [Generic Guidance Chapter 10 Sustainable Development](#). This plan is then checked annually, by the PCO
- the latest ESF Managing Authority (MA) Guidance on Cross Cutting Themes policies and plans which covers all Providers including sub-contractors can be found on [Cross-Cutting Themes Guidance for European Social Fund](#). It includes Sustainable Development and Equality.

## Evaluation

63. Evaluation of ESF 2014 to 2020 will be an important element of the ESF provision. Details on how this provision will be evaluated will be provided at a later date. Further information can be found here: [Action Note 022/18](#) The General Data Protection Regulation (GDPR) and ESF - Additional guidance on collecting and processing participant data for monitoring and evaluation.

64. The Common Provisions Regulations (CPR) and ESF regulations require the MA to monitor and evaluate ESF-funded activities. The ESF Operational Programme 2014 to 2020 states that robust

governance and accountability require programme related analysis, monitoring and evaluation to form an integral part of programme delivery.

65. Guidance on [ESF and YEI Participant Contact Details version 5](#) explains the requirement for, and the process by which, contact details for all participants on ESF provision must be submitted to the MA.

This document covers:

- the regulatory and legal basis behind the requirement to collect and share participant data, including contact details
- the requirement for the participant privacy notice to be used with all ESF and YEI participants
- what contact details need to be collected and how they will be reported to the MA
- the handling of contact details for certain 'sensitive' groups. This guidance applies to both ESF and 'match' funded participants

66. In order to conduct monitoring and evaluation, individual participant data is required. There is a legal basis for collecting and processing personal data and sharing it with the MA for the purposes of monitoring and evaluation (Article 56 of the CPR and Articles 5 and 19 and Annexes I and II of the ESF Regulations). Therefore, participant consent to collect participant data and to be re-contacted for monitoring and evaluation purposes is not required. As such, participant data, Version 5 published 4 June 2018 including contact details should be collected and stored for all participants in order to meet monitoring and evaluation requirements. This includes all ESF and 'match' funded participants.

67. For the purposes of the General Data Protection Regulation (GDPR), the DWP is the data controller in respect of information processed which relates to all participation in the European Social Fund.

68. The [ESF Programme Action Note 018/18](#) sets out the lawful basis for processing personal data under ESF.

69. All personal data held by DWP or research contractors for the purposes of evaluation will be permanently deleted no more than six months after the research has been completed (i.e. when the final report is published on GOV.UK). Personal data held by DWP for all other ESF purposes, as required by European Commission regulations, will be retained in line with the [current guidance](#) on GOV.UK.

70. More information about how and why DWP uses participant personal information, including how to ask for a copy of the personal information DWP holds about the participant can be found in [DWP's personal information charter](#).

71. For additional information on data Right of Access Requests please refer to: [Action Note 020/18](#).

## **Electronic Signatures**

72. You now have the option of using an electronic “wet” signature, obtained via an electronic signature encrypted software app which can be used to collect a signature for any ESF documents where a wet signature would normally be collected. This will allow the participants to electronically sign documents using a login and password process, where the signature can be tracked, and the document can be saved in a PDF format for audit. This will apply whether the participant is seen face to face or remote delivery is undertaken.



73. We do not prescribe which app you can use, any which meet applicable ESF rules and audit requirements are acceptable to DWP, if the required evidence is retained in line with document retention policy Section 7 - 17. This arrangement will remain in place until the end of the programme.

74. This decision is consistent with the 'Electronic signatures' sub-section of the 'ESF National Eligibility Rules and Programme Guidance' published on GOV.UK. This reads as follows:

'The use of electronic signatures on ESF documentation is permissible. Regulations make provision for signature evidence to be held electronically and for "wet" signatures to be digitised. All such documentation should be retained. For the purposes of the ESF programme an electronic signature is the electronic equivalent of a written signature.'

75. Written (wet) signatures continue to be eligible on documents in line with ESF guidance published since the start of the Programme. For additional information please refer to: [ESF Action Note 066/21](#)

## **Annex 1: ESF 2014 to 2020: Good News Story template and consent form**

### **Living with COVID-19: Signatures on Good News Stories**

As all COVID-19 restrictions have been lifted and the updated government advice has progressed to 'Living with COVID-19' it is no longer appropriate for ESF-related paperwork, completed when delivering provision remotely, to contain 'COVID-19' in lieu of a signature from 7 May 2022.

We are now asking that 'COVID-19' is replaced by 'Remote delivery' in the signature box for those participants who cannot be seen face to face. The 'COVID-19' wording will not be accepted on any Annex 1: ESF 2014 2020 Good News Story Template and Consent Form (Annex 1) submitted from 7 May 2022.

The Annex 1 which requires a participant's signature, should be annotated 'Remote delivery' in the signature box to confirm the participant has given consent during this period and the date should be included. All case notes held on file must reflect the conversations which have taken place with participants and the information on Annex 1. Email evidence for audit should be gathered and retained to demonstrate the individual's participation on the programme.

Alternatively, you now also have the option of using an electronic "wet" signature, obtained via an electronic signature encrypted software app which can be used to collect a signature for any ESF documents where a wet signature would normally be collected. This will allow the participants to electronically sign documents using a login and password process, where the signature can be tracked, and the document can be saved in a PDF format for audit. This will apply whether the participant is seen face to face or remote delivery is undertaken. For more information, please see section 72 to 75.

Please note, that whilst the department supports a blended delivery model for all ESF funded provision, this must be based on participant need and the preferred method of delivery is face to face. Our Performance Managers will continue to monitor whether remote delivery is being overly relied upon and will discuss this with you during your monthly CPR meetings.

Your records and Part 4 of the Annex 1 should clearly state why remote delivery was the most appropriate and an email audit trail should exist to demonstrate paperwork was completed in agreement with the participant if no wet signature has been obtained. If the signature box is annotated 'Remote delivery' you should obtain a signature retrospectively when they are next seen in person, and such form/s retained on file, for audit. When you are delivering face to face, a wet signature must be obtained.

We would like to use your recent experience as an example to tell others about how European Social Fund and the Department for Work and Pensions can help them. We call this a good news story and would like to set yours out in part 4 of this form. We would then like to use your story to show how our services are helping people improve their skills and move into employment.

Before any story can be published, we need to seek your agreement to share your details. We would be grateful if you could please agree to do this and sign the consent section below in part 2.

## **How will my story be used?**

- we may use your case study in local, regional, and sometimes national, newspapers (also known as the press). We would like to use your photograph to accompany your case study wherever possible. Occasionally, we might want to interview you to gather more information
- we may also use your case study in various magazines, leaflets, newsletters or on websites
- we may refer to your case study on a radio station, TV or video
- DWP Ministers sometimes use case studies when speaking in Parliament or making speeches

## **Good News Story template and consent form**

# Part 1 – Participant details

**Name:**

---

**Age and Sex:**  
**(Optional)**

---

**Outcome:**  
**(For example, progress made or job)**

---

**Help through ESF?:**  
**(ESF or Match funded provision)**

---

**Provision Start Date:**

---

## **Part 2 – participant content**

**I give my consent for the DWP, national, local, ESF partner organisations to use my case study for up to 12 months, in the following ways**

**To use my name (tick or x)**

**To use my photo (tick or x)**

---

In newspaper articles (some articles may also appear on the newspaper's website)

---

**I give my consent for the DWP, national, local, ESF partner organisations to use my case study for up to 12 months, in the following ways**

---

**To use my name (tick or x)**

**To use my photo (tick or x)**

In leaflets, feature articles (magazines) or digital media, (for example, websites), radio, video, local newsletters, exhibition stands etc.

---

In Government Ministers' speeches or in written reports or written reports for example DWP annual Reports

---

I would like to see any press release written about my good news story before it is sent to the media (tick whichever applies)

---

Yes

No

**I give my consent for the DWP, national, local, ESF partner organisations to use my case study for up to 12 months, in the following ways**

**To use my name (tick or x)**

**To use my photo (tick or x)**

---

Participant signature:

Date:

---

## **Part 3 – tips for completing the Good News Story**

Please describe your participant's journey using the following criteria:

- name of provision and whether funded by European Social Fund or match-funded
- brief participant background
- route to the provider, why did they join?
- what help did the provider provide?
- explain the absence of the participant's wet signature and why remote delivery, rather than the preferred method of face to face, was the most appropriate

- were there any barriers or obstacles?
- progress made, what impact has this had on the participant's life?
- please include quotes from participant, adviser or employer?
- does the participant have any future plans or ambitions?

### **Anonymity**

In exceptional circumstances we may be able to use your good news story without using your real name, for instance, if there are sensitivities around the information you have provided. However, this would greatly limit the use of your story in the general media and we may not be able to use it at all.

## **Part 4 – participants good news story**

## **Part 5 – Provider information**

**Name of Provider or sub-contractor:**

---



**Provision title:**  
(for example, European Social Fund (ESF))

---

**Has this story appeared in any other media?**  
(for example, local/regional newspaper, internal newsletter, any photos – please state)

---

**Contract Package Area (CPA) where the provision is being delivered**

---

**Name of Contact/Adviser:**  
(Please include phone/email details)

---

**Date form completed:**

---

## Part 6 – employer details

**Name:**

---

**Address:**

---

**Type of business:**

---

**Employer consent to publicity**

Yes

No

Date:

---

**Name and signature:**

---

Thank you for completing this form

Provider – Please return this form to your DWP Performance Manager and email a maximum of one GNS via unencrypted email to:

[cepesf14-20.marketing.publicity@dwp.gov.uk](mailto:cepesf14-20.marketing.publicity@dwp.gov.uk)