



Department
for Work &
Pensions

**CONSULTATION ON THE EUROPEAN SOCIAL
FUND IN ENGLAND 2014-2020 OPERATIONAL
PROGRAMME**

GOVERNMENT RESPONSE TO CONSULTATION



© *Crown copyright, 2014*

Copyright in the typographical arrangement rests with the Crown.

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, www.nationalarchives.gov.uk/doc/open-government-licence/ or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

This document/publication is also available on our website at <https://www.gov.uk/government/consultations/european-social-fund-operational-programme-2014-to-2020>

If you have any enquiries regarding this document/publication, email esf.feedback@dwp.gsi.gov.uk or write to us at:

Department of Work and Pensions
ESF Division
Rockingham House
123 West Street
Sheffield
S1 4ER

For all our latest news and updates follow us on Twitter:

<https://twitter.com/DWPESFEngland>

September 2014

ISBN: 978-1-78425-317-2

CONSULTATION ON THE EUROPEAN SOCIAL FUND IN ENGLAND 2014-2020 OPERATIONAL PROGRAMME

GOVERNMENT RESPONSE TO CONSULTATION

Introduction

The European Social Fund (ESF) will invest €3.5 billion in employment, skills and social inclusion measures in England in 2014-2020. This investment will support EU, national and local strategies to extend employment opportunities and to develop a skilled and adaptable workforce.

Following the launch of the new European Structural and Investment Fund regulations in October 2011, officials spent much of 2012 gathering views about what was working well in the existing programme and what could be improved in the new one. That led to the development of a new more localised approach, proposals for which were discussed in large consultation events up and down the country in November and December 2012. These proposals were broadly endorsed, so during 2013 Local Enterprise Partnerships were commissioned to work with partners to develop strategies which set out local priorities for these funds, within a national; framework of policy priorities.

A draft of the England ESF Operational Programme (OP) for 2014-2020 was developed to reflect the national policy framework and the priorities identified in local strategies. Consultation launch events were held in London on 31 March 2014, and then on 14 April 2014 the Government launched a consultation on the draft document. The consultation period lasted 4 weeks to 9 May 2014.

The consultation sought views on the following aspects of the draft programme:

- Objectives
- Needs and Opportunities
- Operational Programme and Local Strategies
- Joined Up Delivery
- Programme Performance Measures and Demonstrating Impact
- Cross Cutting Themes
- Community Led Local Development

Equalities Assessment

Views were also sought on two specific questions:

1. In what ways do you think that the European Social Fund programme could have positive or negative effects on particular social groups?

(For example: young people, older people, disabled people, people from particular ethnic groups, women, men, LGBT people, women who are pregnant or looking after young children?)

2. Are there any opportunities to further enhance equality through the European Social Fund programme and how might any negative effects be mitigated? Do you have any suggestions for improving access to the programme for different groups of people?

This document provides a summary of stakeholders' responses to each of the questions put in the consultation. It also sets out the position of the Government on these issues and the modifications made to the draft OP in the light of stakeholders' views. The revised draft OP, which was submitted to the European Commission on 18 July 2014, can be downloaded at <https://www.gov.uk/government/consultations/european-social-fund-operational-programme-2014-to-2020>

The draft OP is now subject to a period of negotiation with the European Commission and is likely to change as a result. We expect that a finalised OP will be agreed during the Autumn. The first 2014-2020 programme application rounds are expected to be held early in 2015 with project activity starting in the first half of 2015. In the meantime, activity under the 2007-2013 programme is continuing.

Consultation responses

There were 49 written responses to the consultation. The breakdown by organisation type is shown below.

Type of respondent	Number of responses
Civil Society	10
Environmental Partner	2
Further Education	2
Local Enterprise Partnership (LEP)	11
Local Authority	12
Opt-In ¹	1
Private Business	3
Social Partners	3
Other	5
Total	49

Overall the responses were broadly supportive of the strategy and priorities of the draft programme. Many responses suggested amendments to the draft document, or emphasised the importance of particular target groups or activities contained in the draft programme. Not all of these comments

¹ Organisations providing match funding, such as DWP, the Skills Funding Agency and the Big Lottery Fund.

required changes to be made to the draft document – it is intended to be strategic document which sets out the framework for the programme and as such does not need to contain all of the detail about specific activities which will be funded. Some responses raised points that will be reflected in programme guidance or information systems rather than the OP document.

1. Objectives

To what extent will the Operational Programmes (OPs) focus EU structural and investment funds on priorities and activities that can deliver local growth and jobs in line with the Europe 2020 objectives?

The overall majority of respondents were supportive of the priorities and activities set out in the draft OP. Understandably there were some calls for more emphasis to be given to some categories of beneficiary from organisations representing those groups or sectors.

A number of respondents raised the issue of funding for higher level skills training, including support for post graduate activity. A small number called for the inclusion of volunteer time as acceptable match funding.

The inclusion of older workers as a specific target group was highlighted by a range of respondents. In addition, there was a call for recognition of the needs of people with mental health problems when considering the priority beneficiaries of ESF funding.

Government Response

The Government welcomes the broad support for the priorities and activities proposed in the draft ESF OP, including the importance of higher level skills for economic growth and competitiveness.

The relevant text in the OP has been refined to clarify the approach to higher level skills, including the need to add value to the substantial domestic resources devoted to support higher skills training, and to avoid conflicts with national policies on grants and loans

The ESF will be used to support a wide range of disadvantaged people and the list of potential beneficiaries has been expanded to include people with mental health problems and homeless people. In addition the text has been clarified so that the reference to older workers is clearer. Ultimately it will be for local partners to ensure that local needs are met.

Although the use of volunteer time as match funding has caused some problems in previous programmes, the Government recognises that for some Civil Society organisations this is an essential element to their participation in the programme. Therefore the use of volunteer time as match funding will be considered on a case by case basis as part of the normal project selection process. This will be clarified and reflected in guidance to all partner organisations. This level of detail does not need to be included in the OP.

2. Needs and Opportunities

Do the descriptions of needs and opportunities underpinning the OP strategies and priorities match your understanding of what is needed locally? How could it be strengthened?

Most respondents supported the proposed OP, particularly the focus on reducing the number of young people not in education, employment or training (NEET), supporting people at a disadvantage in the labour market and initiatives to combat poverty, raise basic skills, and build community cohesion. Most also confirmed that the OP was sufficiently broad enough to enable projects to be developed to address local needs.

Some respondents suggested additional material should be added, to highlight the needs of particular disadvantaged groups and show areas that ESF could support. For example, people with mental health issues, older workers, travellers, care leavers, unemployed people with health problems and those with chaotic lifestyles.

One organisation agreed with the OP's comments on the need to address access to transport as a barrier to work, advising that transport poverty is a daily problem for many people. Some respondents highlighted rural deprivation issues and the need to help remote communities access support.

Several respondents wanted the OP to say more about support for higher level skills. Others highlighted their approval that higher level skills had been included. Some respondents supported a focus on basic skills and qualifications up to level 3. Respondents from one sector suggested that the OP should reflect that, in some LEP areas, up/re-skilling will be more important than a traditional focus on unemployed and excluded groups.

It was also suggested that there is a need to improve information and guidance to girls and women on career and study options. Several respondents highlighted the need for more explicit reference to measures to promote gender inclusion and equality, entrepreneurship and addressing the digital divide.

Government Response

The Government welcomes the general support from respondents for the identification of needs and opportunities in the OP. It agrees with those who argued that ESF should address the needs of people who face particular barriers to work, including people with mental health conditions and other problems. The OP has been amended to clarify that references to people with disabilities and health conditions include people with mental health conditions, and that care leavers, unemployed people with health problems and those with chaotic lifestyles are also within scope.

It would be impossible, and is unnecessary, to list all of the disadvantaged groups which can access ESF support. The groups mentioned in the OP are not an exhaustive list.

The Government agrees with those respondents who commented that higher-level skills and up-skilling are essential for a world-class economy with high levels of productivity, and the OP has been amended to reflect this. The OP provides the flexibility to tackle specific local skills shortages. The Government does not believe that higher level skills should be prioritised above basic skills. A primary aim of ESF is to help people without basic skills or relevant level 2 qualifications, to enable them to progress at work or move closer to the labour market.

It is important that all partners and providers involved in the delivery of the programme having a good understanding and awareness of equality legislation, and that they comply with the relevant public duties on equal opportunities. Comments from some respondents requested more specific references to measures to support gender equality and the need to improve information and guidance to women and girls. The OP has been amended accordingly.

3. OP and Local Strategies

Is there scope within the content of the OP to be able to deliver the priorities set out in ESIF Strategies? If not, what other activities should be considered? Does the approach allow for all relevant sectors and partner groups to benefit and be involved?

Most respondents supported the proposed OP and were content that the range of activities proposed in the OP was sufficiently broad to accommodate local priorities.

Some respondents welcomed the proposed greater flexibility on the level of training that can be supported. However, some respondents also commented that there was not enough emphasis on higher level skills, especially higher level apprenticeships and higher level vocational skills.

The Youth Employment Initiative (YEI) was welcomed by some respondents; it will provide support to tackle high youth unemployment in the qualifying regions. There was some concern about the eligibility criteria for participants, as set out in the regulations. In particular, the exclusion from YEI funding of young people in full time education.

There were comments about the need to be more specific in targeting women and girls, particularly encouraging more participation in Science Technology, Engineering and Mathematics (STEM) sectors.

Requests were also made to add more detail about apprenticeships and traineeships and how they could be tailored for specific groups, such as disabled people and other disadvantaged groups, as well the inclusion of wrap around support. Some respondents suggested that pre-employment activity is included for those who are not ready to go directly into work.

Several respondents noted that, in relation to targeting skills training and provision, there is no specific reference to the needs to particular groups.

Some respondents suggested that there could be more emphasis on supporting self employment and on progression to facilitate greater opportunities for those gaining basic skills.

One respondent suggested that there should be local flexibility to depart from the eligibility funding rules, where evidence and special circumstances suggest this is required. Suggestions were also made to allow the use of ESF funding for individuals below the age of 15.

Government Response

In response to proposals made by respondents, the Government has amended the OP, to strengthen it and provide clarity in respect of eligible activities, target groups, gender equality and equal opportunities.

The OP has been amended to reflect the importance of higher level skills and to clarify the eligible activities that ESF can be used to fund.

The OP has also been amended to provide more detail about eligible wrap around support activities for Apprenticeships.

The Government notes concerns about the eligibility criteria for YEI participants, but they are specified in the European Regulations and cannot be amended. Although support of young people in full time education is excluded from YEI support, it is worth noting that non-YEI ESF can still be used on activities to prevent young people becoming NEET.

Pre-employment activity is important in ensuring individuals furthest from the labour market are equipped with the skills to move them into work or closer to the labour market. The OP makes provision for these activities.

The Government welcomes the comments and suggestion about encouraging participation of women and girls in the STEM sectors. The OP has been amended to strengthen these references.

Self-employment and progression in the workplace are important for lifting people out of worklessness and poverty, as well as increasing the skills base. The OP makes reference to both.

Whilst the Government notes the request for local flexibility in respect of eligibility funding rules and using ESF to support young people below the age of 15, the focus of the OP is on increasing participation in the labour market; so support to younger people would divert resources away from those who need more immediate help.

4. Joined-Up Delivery

How can the structural funds be used alongside other EU and national funds to achieve the Europe 2020 objectives?

Although there was broad support for the delivery model proposed in the OP, a number of respondents, mainly local authorities, suggested more emphasis

on closer alignment between ESF and the European Regional Development Fund (ERDF) at the local level.

The TUC expressed support for transnational activity on the grounds that these types of projects help to spread good practice and mutual learning.

There were several questions about the opt-in organisations, including how these would work collectively to avoid duplication and deliver what is needed on the ground. Also, some respondents wanted more information about the opt-in organisations to be included in the operational programme.

There were also some requests from a small number of respondents for better alignment of ESF and national funds

Government Response

The Government welcomes the general agreement with the proposed delivery model for ESF, under the European Structural and Investment Funds Growth Programme. The model was developed so that ESF and ERDF could be better aligned and overseen by a single monitoring committee. Local committees will oversee delivery of both ESF and ERDF at local level, and a single business process should also reduce the administrative burden on delivery partners.

The opt-in model will enable LEPs and local partners to benefit from match funding and administrative support from key national delivery organisations, whilst retaining influence and strategic control over local delivery of what is funded by ESF. It provides a mechanism for national bodies to deliver policy priorities that are part-funded by the European Structural and Investment Funds and which are tailored to local needs. Although the requirement to account for and report on the Funds separately makes it difficult to have complete alignment of funds, ESF and ERDF will be aligned as closely as possible at the local level.

The OP does not need to contain any further detail about the opt-in organisations. Funding agreements will be assessed and agreed at local level.

The OP will support transnational co-operation with the aim of promoting mutual learning and thereby increasing the effectiveness of policies supported by the ESF. Transnational co-operation activities will involve partners from at least one other Member State as well as the UK. There will not be a specific priority axis dedicated solely to transnational co-operation activities and it will be for local organisations to identify joint activities and projects.

5. Programme Performance Measures and Demonstrating Impact

What indicators should be used to measure the performance of the programmes? How do you think we could effectively promote and demonstrate the performance of the Programme and impact of the funds?

Several respondents proposed the use of 'soft' indicators and highlighted the need to assess 'distance travelled', especially for disadvantaged participants on the programme. A local authority said that there needed to be a mix of appropriate hard and soft indicators. An organisation said that softer outputs and progress measures could help assess the programme's impact on people who are unlikely to gain employment or a qualification within the lifetime the programme. One LEP said that 'soft outcomes' need to be considered for those who are far from the labour market. A civil society organisation said they would like to see, under Thematic Objective 9, a specific indicator that treats volunteering as a positive outcome for those furthest from the labour market and gives recognition and reward to those organisations that have helped participants enter volunteering or community work.

One social partner noted the importance of the ESF programme's management information system and said that they expect a wide range of partners to be consulted and involved in developing the system.

Respondents felt that there needs to be greater clarity on the OP's indicators. Any guidance issued by the Managing Authority on indicators needs to be clear about what is being reported and how. Also, performance measures and impact measurement principles should be based on the availability of existing data and not by creating new monitoring streams.

A number of organisations felt that the OP's output and result indicators need to cover the programme's wider economic impact at the local level. For example, the management information system needs to focus on outcomes of economic growth and employability and not just quantifying common output indicators. Another point highlighted was that data should be collected to assess the programme's wider impacts on employment and inactivity rates, and the ability of local businesses to fill vacancies. It was suggested that indicators should cover the local gender pay gap and inequalities in local pay distributions.

A specific point raised was that there are no indicators on how many participants live in rural areas. One civil society organisation said they would welcome the inclusion of output indicators, especially for projects implemented by NGOs, social enterprises and those focussed on helping women to progress.

It was suggested that when performance is being measured and reported it needs to cover ESF and match funded activities. This issue is particularly relevant to match funding for opt-in organisations. Projects and partners need to be able to obtain a clear picture locally of what is being delivered, so that

gaps in provision can be identified and addressed, to ensure that local needs are being met.

It was also suggested that the use of case studies that showcase the success of individuals, especially from disadvantaged groups, be used to promote and demonstrate the programme's performance.

There was concern that the OP did not explain how evaluation studies and results will be shared with local LEP committees – it just describes links to the national sub committees of the programme monitoring committee. It was proposed that some consideration be given to such studies, as they could help increase the knowledge of what works or not at the local level.

Government Response

There are a number of layers to the management and reporting of ESF performance. The Operational programme sets out a number of output and result targets against which we will need to report progress. We are also required to provide data on a range of indicators set out in the EU regulations. Individual projects might, in addition, choose other ways to measure and demonstrate achievement. Finally, we will put in place evaluation arrangements which will seek to measure impact which is broader than can be demonstrated through management information.

In that context, whilst soft outputs and 'distance travelled' can be important at project level, especially in terms of helping to motivate individuals; the gathering of consistent and meaningful data at programme level is likely to be problematic.

The Government expects that the Managing Authority will consult widely and work closely with opt-in organisations, LEPs and other partners to ensure that the management information system is fit for purpose and can generate the required reports at local and national level.

A high level of clarity is important, and the European Commission has produced detailed technical guidance on the indicators that have to be used, as well as defining data collection standards. The Managing Authority will ensure that programme guidance manuals contain all the relevant technical information that is required and this information will be presented as clearly as possible.

On 'rural data', the ESF regulations require a representative sample of data to be used to identify how many people are living in rural areas when they join ESF activities. This data must be reported to the European Commission by 2017.

The Government agrees that identifying gaps in provision is important, which is why the opt-in organisations have worked closely with LEPs in recent months to help identify such gaps in provision.

The Government agrees with the suggested approach for promoting the performance of the programme, to include case studies. It is used in the current programme and will be carried forward to the new one. It also agrees with the point raised about the lack of explanation about the sharing of evaluation studies and results and confirms that the ESF evaluation strategy for the new programme will include a description of how evaluation results will be disseminated to partners.

6. Cross Cutting Themes

How do you envisage implementing the cross cutting themes locally? What more if anything would you like to see in the Operational Programmes?

Gender Equality and Equal Opportunities

The majority of respondents were broadly supportive of the mainstreaming approach set out in the operational programme.

The issue of equality targets was raised by a number of organisations. One local authority said that the mainstreaming approach should focus on delivery agents having equality targets and that these should be combined with robust monitoring. A civil society organisation emphasised the need for consideration to be given to local targets for cross cutting themes, to help ensure that needs are being met. An opt-in organisation said that it was important that any targets set for equality (for example covering representation or participation) should relate to the population of the specific cohort being targeted and not the general population.

One organisation felt that there needed to be greater clarity on how national and local activity will be co-ordinated, and a civil society organisation felt that there was a poor level of representation of the voluntary, community and social enterprise sector (VCSE) on LEP boards.

One LEP was concerned that the OP's proposed arrangements for training people on the cross cutting themes excluded local partners. The OP has been amended to correct this omission.

A number of local authorities and LEPS highlighted the importance of the programme's commissioning and project selection processes in terms of ensuring that services meet needs. The Government agrees that it is very important that equality is fully integrated into the commissioning process and that project / provider applicants explain in their applications how they will tailor provision to help people who are disadvantaged in the labour market.

One local authority said that 'health' should be a cross-cutting theme.

Sustainable Development

The majority of comments related to the OP's lack of cross-referencing to complementary activity in relation to other environmental thematic objectives. One environmental organisation said that ESF complementary activity should not be restricted to skills but should also include behaviour change.

Government Response

It is important to ensure open and transparent monitoring of equality data and information on how the programme is helping different people should be publicly available at the national and local level. At national level, there will be an equality sub committee to report on equality performance issues to the national ESIF growth programme board. Local committees should work with local experts to help them judge if the representation of different groups is fair and can be justified.

The Government wishes to avoid an overly 'mechanistic' application of any equality targets that may be adopted, since this could result in irrational decisions being made. In order to be relevant, any equality targets should be informed by the population characteristics of the specific cohort being targeted. The nature of targets will be part of the negotiations with the European Commission.

Clarity and co-ordination is important which is why opt-in organisations have been working closely with LEPs to map-out existing provision and identify new provision that will add value and meet local needs.

It is essential that a wide a range of local and community based organisations are involved in the programme. The cross cutting theme sub committee, reporting to the national programme board, will also consider the extent to which local and community based organisations are being engaged locally and will make recommendations for action where appropriate. The equality cross cutting theme will be included in the evaluation of the future programme, and engagement with equality and community organisations, will be assessed as part of this process.

The Government did not have the option of making health a cross-cutting theme since it is not covered in the common provisions regulation. However, although it is not a regulatory theme, there is flexibility in the programme to support people with health issues who are disadvantaged in the labour market.

It is important that ESF can provide complementary support for environmental projects delivered under other programmes and this is now explained in the OP. Behaviour change is important when promoting sustainable development, but it is not part of ESF's 'mission' as defined in the regulations. The focus of any complementary ESF activity has to be on skills and jobs. Nevertheless, it is possible that some behaviour change might result indirectly, following environmental or green skills training supported by the ESF.

7. Community Led Local Development

How do you see Community Led Local Developments (CLLDs) adding value? What further guidance would be helpful?

Around two thirds of respondents expressed views on Community Led Local Development (CLLD). The majority were broadly supportive that CLLD can add value to local ESIF strategies and many commented positively on the core CLLD approach of enabling communities, particularly in less well developed areas, to determine relevant solutions to local needs around growth, employment, skills and social inclusion.

A number of Civil Society respondents welcomed CLLD support for social justice, commenting on its potential to improve access to funds, devolve decision making to the lowest level and offer a unique, long-term strategic investment focus on sustainable outcomes. They also felt that it can build the capacity of communities to work in partnership, use ESI funds in an integrated (multi-fund) manner and help leverage further funding.

Some respondents commented that they did not see CLLD adding value beyond existing mainstream provision supported by ESIF strategies. Alternative community focused approaches were proposed in some local areas, and they included the use of grant co-ordinating bodies and through arrangements involving the Big Lottery Fund.

Some respondents requested further information in the OP or guidance to help them form a clearer view on the added value of CLLD and decisions on their involvement. These requests included:

- a timeline for the development of Local Development Strategies by Local Action Groups (LAG);
- implementation matters – including on support for preparatory costs, governance arrangements, the role of Accountable Bodies, how multi-funding will work and the development and approval of LAG strategies;
- match funding arrangements – including scope for using volunteer time;
- how outcomes will be measured, monitored and evidenced and
- alignment of ESIF Growth programme CLLD with the development of 2014-2020 LEADER LAGs.

A number of respondents focused on specific groups that are often disadvantaged or marginalised in society and may be supported by LAG strategies. There were requests for these groups and/or the interventions that support them to be mentioned in the OP or CLLD guidance. Examples include:

- volunteering and community work placement activity that helps support people to overcome social disadvantage;

- counselling and peer support initiatives with people who are homeless or have drug or alcohol issues;
- help for Gypsy, Roma and Traveller communities within CLLD LAGs and projects;
- activities to promote social inclusion that also address environmental issues; and
- providing different access arrangements and support for lone parents and other groups to help overcome employment related inequalities.

A number of respondents commented on partnership working. For example:

- the value of securing the participation of business and public sector bodies in community level activity;
- ensuring that community groups engage with elected accountable representatives across the community;
- engaging with ESIF and other mainstream providers, as CLLD can act as an outreach and engagement activity to help people access other support; and
- the potential to engage the Higher Education sector on CLLD approaches.

Government Response

The Government welcomes support from the majority of respondents for the inclusion of community-led local approaches as part of an integrated or multi-fund package across a range of urban, urban/rural and rural geographies within the ESIF Growth programme. This aligns with the rationale and outline model for CLLD set out in the ESF OP.

In line with the 2014-2020 ESIF programme as a whole, the CLLD approach set out in the ESF OP² has been designed to give flexibility at the geographical level in which it operates. This is typically expected to be areas of greatest need within LEP areas that wish to use CLLD approaches.

Within ESF and ERDF OPs the use of CLLD is optional and is not the only way to support investment in local development, community or smaller scope projects, which is reflected in the comments from those respondents pursuing alternative community level interventions.

Further local discussions will take place between those LEPs that feature CLLD within their ESIF strategies and Managing Authorities to help finalise CLLD proposals. These will, for example include issues around rationale, added value, scale and value for money; and they will take into account feedback from the European Commission on draft ESF, ERDF and EAFRD OPs.

² The Government's commitment to the inclusion of Community Led Local Development within the England 2014-2020 European Structural and Investment Funds Growth Programme is also set out in the UK Partnership Agreement and the 2014-2020 England Operational Programmes for the European Regional Development Fund and European Agricultural Fund for Regional Development.

The Government understands the requests for further information and guidance on CLLD as it becomes available. Whilst some issues raised are being included within the ESF OP, it is more appropriate for the majority to be addressed within ESIF wide CLLD communications and more detailed guidance to partners, to be published from summer 2014 onwards.

The Government recognises many respondents have significant experience of delivering ESF interventions with particular groups and notes the comments that these should be eligible within the 2014-2020 ESF OP. The ESF OP can only provide examples of groups and activities that can be supported. Groups and interventions not mentioned in the OP can be eligible, where they are consistent with the over-arching priorities in the OP and with the regulations.

The Government recognises the importance of partnership working, which is at the core of the ESIF Growth Programme. The examples provided are potentially relevant to community-led approaches.

Equalities Assessment Questions

1. In what ways do you think that the Growth Programme could have positive or negative effects on particular social groups?

(For example: young people, older people, disabled people, people from particular ethnic groups, women, men, LGB and T people, women who are pregnant or looking after young children?)

One civil society organisation expressed concern about the lack of specific reference to gypsy-Roma-traveller (GRT) communities in the OP. They felt that the needs of the GRT community should be acknowledged specifically.

Another civil society organisation suggested that the OP should recognise the benefits of using recovery colleges to support homeless people. The programme should also support young people who have experienced care, even if they are not officially recognised as care leavers.

One civil society organisation felt that the operational programme needed to recognise that, for some, the journey towards employment might be longer and require more intensive support. They explained that voluntary activity can be a very positive experience for somebody who has been out of the labour market for some time.

Government Response

The OP has been designed to be flexible enough to support these groups and activities. It is, of course, important that local organisations themselves engage with LEPS to explain these benefits directly. Organisations applying for funding will, in any event, need to explain how the design and delivery of their activities will benefit the people being targeted.

The Government fully recognises the importance of voluntary activity and how this can be an important step towards employment. For example, it can

improve confidence, help motivate people, and also enhance a CV. Although the EU Structural Funds guidelines for indicators do not recognise voluntary work as a 'result' in terms of an improvement in employment situation, there is no reason why voluntary activity should not be supported under ESF if it is targeted at appropriate groups, such as those who are furthest from the labour market.

2. Are there any opportunities to further enhance equality through the Growth Programme and how might any negative effects be mitigated? Do you have any suggestions for improving access to the Programme for different groups of people?

One LEP felt that ESF support for STEM subjects should go beyond just helping women. Another was concerned that the Investment Priority, 'Enhancing equal access to lifelong learning', was too restrictive because it appeared to be targeted only at women, the over 54s, ethnic minorities and disabled people.

Government Response

The OP explains that the ESF can be used to support current or predicted skills needs of SMEs, as well as encourage take-up by particular groups. For example female take up of STEM provision aims to address a gender imbalance in this provision.

The proposed output target for the number of participants who are women, over 54, ethnic minorities or disabled, in each category of region is not intended to exclude other groups but simply to reflect the importance of ensuring that support is focused on those groups who face particular barriers in progressing at work or are less likely to participate in adult learning.