



Department  
for Work &  
Pensions

## **Consultation Response Form**

**Consultation closing date: 5.00pm on 9 May 2014**  
**Your comments must reach us by that date and time**

# **2014-2020 European Structural and Investment Funds Growth Programme in England: Consultation on European Social Fund Operational Programme**



European Structural and Investment Funds  
Growth Programme for England (2014-2020)

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If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

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|   |                          |
|---|--------------------------|
| <b>Please tick if you want us to keep your response confidential.</b> | <input type="checkbox"/> |
| Reason for confidentiality:   |                          |
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|--|--|
| Name:  |  |
| Please tick if you are responding on behalf of your organisation.    | <input checked="checked" type="checkbox"/> |
| Name of Organisation (if applicable): Nottinghamshire County Council |  |

Please mark the box that best describes you as a respondent.

|  |  |  |
|--|--|--|
| <input type="checkbox"/> Local Enterprise Partnership  | <input type="checkbox"/> Private Business      | <input type="checkbox"/> Opt-In Organisation   |
| <input checked="" type="checkbox"/> Local Authority    | <input type="checkbox"/> University            | <input type="checkbox"/> Core Cities           |
| <input type="checkbox"/> Civil Society                 | <input type="checkbox"/> Further Education     | <input type="checkbox"/> Chambers of Commerce  |
| <input type="checkbox"/> Growth Programme Board Member | <input type="checkbox"/> Social Partner        | <input type="checkbox"/> Rural Community Group |
| <input type="checkbox"/> Local Action Group            | <input type="checkbox"/> Environmental Partner | <input type="checkbox"/> Other                 |

Please specify if marked as 'Other':

# Consultation questions

## 1. Objectives

To what extent will the Operational Programme focus the European Social Fund on priorities and activities that can deliver local growth and jobs in line with the Europe 2020 objectives?

### Comments on **European Social Fund Operational Programme:**

We welcome the objectives to promote employment and social inclusion and invest in education skills and lifelong learning, and believe that they complement local priorities for developing a flexible and innovative workforce to support future economic growth. The focus on developing skills and capacity of those most excluded and furthest removed from the workforce, particularly those young people who are not in education, training or employment, is particularly relevant in our County, where youth unemployment rates are significantly higher than those in the overall population. Our own work with disadvantaged groups also demonstrates the need for intensive support to overcome barriers to employment, including among older people age 50+.

With regard to the Europe 2020 targets, England is already at an employment rate of 74.0% of 20-64 year olds compared to a European target of 75%. The objective to help the unemployed and inactive back into employment will contribute to meeting this target, along with the objective to tackle barriers to work for the disadvantaged. The objective to improve skills levels will help to address the percentage of people completing third level education.

The objective to increase the number of young people in education, employment or training will address the Europe 2020 target of early leavers from education to be less than 10%. It will also address Country-specific targets on youth unemployment, employer engagement with young people, and the number of 18-24 year old with poor basic skills, although we note that the OP will not address the country-specific target of a youth guarantee to address youth unemployment, nor can ESF address the country-specific target to simplify the national qualifications system. The reasons for this are set out in the OP.

With regard to social inclusion, TO9 is specifically focused on this issue. The Europe 2020 target is to reduce the number of people in poverty across the EU by 20 million. There are country specific targets to enhance efforts to support low income households and reduce child poverty, and to reduce the cost of childcare, improve quality and availability. ESF contributions to these targets will be through enabling people into work, intensive work with excluded or disadvantaged groups, and through provision for childcare costs to be met as part of project costs in the delivery of activity.

We note that the last objective, to make skills provision responsive to local economic need, provides particularly for LEPs to make specific provision relevant to their local areas and this will ensure that ESF activity can be tailored specifically to address local factors.

Devolution of the funding to LEPs should ensure that ESF takes account of the real nature of local labour markets and population, align funds more effectively leading to synergies and improvements in overall outcomes, and particularly, enable the perspectives of both the supply side (individuals seeking work, training provider organisations) and the demand side (SMEs / employers) to be addressed in project development and delivery.

## 2. Needs and opportunities

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

### Comments on **European Social Fund Operational Programme:**

The needs and opportunities described in the OP are at a very general level, but they do reflect largely the requirements of the local area.

We note however that our local LEP areas are not mentioned in the section on territorial variations, even though as a former coal mining area, North Nottinghamshire and North Derbyshire would fall into the category described of significant decline in heavy industry where higher levels of inactivity are seen.

The local EU-SIF document identifies relatively high levels of unemployment in the former coalfields and urban parts of the local LEP area. Youth unemployment is persistently high, well above unemployment rates in older groups, and this also noticeable for the South Notts area in the map illustrating this issue on p17 of the Consultation Draft, although the D2N2 LEP is not referenced as having access to the Youth Employment Initiative in para 45, although there are high levels of youth unemployment, these tend to be concentrated in particular localities.

Our local plans also provide for more focused support in deprived communities and with disadvantaged groups. The County Council has just commissioned new work with learning disabled young people focused on helping them into employment, for example. The OP generally reflects these types of needs.

Unemployment is also a growing problem amongst workers over 50. Many of the older unemployed also face disadvantage such as health or disability issues. The County Council is also aware particularly of ICT skills needs amongst older unemployed workers and would like to see a specific reference to this in the OP.

There is work needed to support unemployed people with health conditions get into work. Broadly this involves linking people to support from health professionals and alongside this, support for employability skills. Experience in the local area shows the health issues are split in the ratio 55% mental health, 35% muscular/skeletal and the balance other conditions, eg. Cancer. Support services for people with health conditions both in work and unemployed is currently funded through local Clinical Commissioning Groups. We understand national government is going to tender for a health & work service but indicators are that this will be 90% by phone & 10% 1:1, and only for those in work who have been off work for 4 weeks. A focus on employability amongst unemployed people with health conditions using ESF for one-to-one work and intensive support would be helpful.

### 3. Operational Programme and local strategies

Is there scope within the content of the Operational Programme to be able to deliver the priorities set out in Local Enterprise Partnership area European Structural and Investment Fund 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?

#### Comments on **European Social Fund Operational Programme:**

There is scope in the OP for most of the envisaged activities within our local LEP EU-SIF document but the D2N2 LEP is also looking to develop sector-based skills action plans to shape provision. This will contribute specifically to the objective to make skills provision responsive to local economic need, as set out in our response at Q1.

The provision of sector-based approaches is not mentioned specifically in the OP and might usefully be added in the context of developing tailored local approaches to address issues in local labour markets, including addressing local skills shortages or opportunities in areas of employment growth.

Within the D2N2 EU-SIF, sectors in which there are skills gaps and forecast future growth where there will be demand for skilled employees, drawn up with input from East Midlands FE colleges, are identified as follows:

- Food and drink manufacturing;
- Engineering including advanced manufacturing;
- Warehousing and distribution;
- Low carbon and sustainable technologies; and
- Creative industries.

The D2N2 strategy is focused on higher value sectors, but the County Council is aware of growth potential in the sectors of health and social care (to do with a growing elderly population) and in the hospitality sector (and more broadly in tourism which is also one of the LEP's key priority sectors). Whilst these may not offer high value employment, they are growing sectors and will offer future employment opportunities, so should not be discounted in the development of skills. There are opportunities also for management and higher specialist skills growth to which starters in those industries can progress.

#### 4. Joined up delivery

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

Comments on **European Social Fund Operational Programme:**

The D2N2 LEP, in which the County Council is a partner, is already working on joining up its Single Growth Fund to work with the EU funds where possible. We are also committed in principle to nearly all of the opt-in offers available, subject to being able to agree local priorities with the opt-in providers.

#### 5. Programme performance measures and demonstrating impact

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

Comments on **European Social Fund Operational Programme:**

Growth in employment rates / falls in unemployment rates and economic inactivity rates.  
Reducing numbers of young people Not in Education, Employment or Training  
Increasing levels of qualifications within the local population  
Reducing numbers of people with no qualifications  
Data from businesses on their ability to fill vacancies and perceptions of skills shortages within the local population.

Specific figures by disadvantaged groups recording outcomes in terms of movement to employment or further training.

Collection of data on participant ages to enable investigation of outcomes by age. This would help to establish whether older workers are being as successful as other groups in accessing the labour market, and might identify if further interventions, e.g. to change attitudes amongst employers, might be needed.

Tools for promotion and demonstration: case studies, preferably showcasing success of individuals, particularly from disadvantaged groups, as a role model for others. We have seen this done by the Prince's Trust with regard to their business support programmes with good effect, and which also had the outcome of generating further referrals / clients for their programmes.



## 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 Programme?

Comments on **European Social Fund Operational Programme:**

We would envisage a consideration of the cross cutting themes as part of the assessment of every proposal to be funded using the ESF, and recording of assistance to people from disadvantaged groups as a standard part of monitoring. Ideally this should include recording age of participants so it is possible to judge levels of engagement from older people.

## 7. Community led local development

How do you see community led local developments adding value? What further guidance would be helpful?

Comments on **European Social Fund Operational Programme:**

CLLD offers an opportunity for local areas to benefit from locally planned and led approaches. Previously we have seen CLLD-type approaches within our area through the local LEADER group. Offering CLLD through the ESF programme gives an opportunity to move this type of approach to other, non-rural areas, such as the market towns of North Nottinghamshire. We would welcome this type of approach particularly with local engagement and involvement from the local third and business sectors. There may need to be additional support provided to make such an approach attractive to businesses to encourage their participation in these types of programmes.

## Equalities assessment 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?)*

### Comments on **European Social Fund Operational Programme:**

The objectives to address social inclusion already identify particular target groups for focus of the funds. These include women, older people, people from particular ethnic groups. These groups will therefore be positively impacted by the ESF programme and will benefit from targeted and intensive support to help them participate in the labour market, which takes account of their particular needs. This is consistent with local plans within the D2N2 LEP, and with the previous experiences of the County Council in delivering employment-related services to disadvantaged people, particularly in older age groups 50+.

There is a specific objective to address youth unemployment, including working with NEET young people and improving basic skills levels among 18-24 year olds, that will impact particularly on young people. This priority is picked up within D2N2 EU-SIF and it will form part of the Nottinghamshire commissioning plans. Under the D2N2 LEP Strategic Objective 13 Young People, provision will be made for innovative activities to support NEET young people to enter the labour market, including those with poor literacy and numeracy skills and with no or few qualifications. This activity will also relate to the Country-specific objectives on combating youth unemployment as described in the first question in this consultation.

With regard to people with children, the ESF provides for childcare costs to be met as eligible expenditure and thus is able to offer a positive effect for people with this type of caring responsibility, that tend to be women.

Given our response to Question 2 on Needs and opportunities above, we would like to see ESF support for unemployed people with health issues.

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?

Comments on **European Social Fund Operational Programme:**

Support for small scale projects targeted at particular sections of the community was more difficult to obtain in the last programming period given the Skills Funding Agency's stated preference for fewer, large contracts. We hope that the devolution of funding to the LEPs will provide revived opportunity for specialist interventions targeted at minority groups. The Social Inclusion Thematic Objective, with the assistance of BIG co-financing, provides a route to do this. Both the third sector and local authorities would be suitable providers of this type of support.

There may also be opportunities to increase digital inclusion, e.g through the development of IT skills training funded through ESF. Being IT literate and online is an increasingly important part of being able to access the labour market, as well as ability to access public services. Nottinghamshire County Council has discovered this to be a significant factor in accessing employment opportunities for older unemployed people. Making IT skills training available to this group particularly will also contribute towards digital inclusion as a wider objective.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

|                                       |                          |
|---------------------------------------|--------------------------|
| <b>Please acknowledge this reply.</b> | <input type="checkbox"/> |
| E-mail address for acknowledgement:   |                          |

Completed responses should be sent to the details below by **5.00pm on 9 May 2014.**

Send by post to:

ESF Operational Programme Consultation  
European Social Fund Policy Team  
Department for Work and Pensions  
Level 2  
Rockingham House  
123 West Street  
Sheffield  
S1 4ER

Organisation: Department for Work and Pensions

Send by email to:

[ESF.2014-2020@dw.p.gsi.gov.uk](mailto:ESF.2014-2020@dw.p.gsi.gov.uk)