

**TEXT OF LETTER FROM LAURIE MORAN TO GOEM
DECLINING TO ENDORSE THE ESF FRAMEWORK ON BEHALF OF THE SECTOR**

Haf Merrifield
Acting Regional Director
Government Office East Midlands

17th December 2009

Dear Haf,

DRAFT EAST MIDLANDS ESF FRAMEWORK 2011-13

As a member of the East Midlands ESF Regional Monitoring Committee I am writing this open letter in response to GOEM's invitation to formally endorse the above document.

I regret to inform you that, on behalf of the region's VCS sector, I can offer no such endorsement. Indeed in the view of our sector the draft Framework is not fit for purpose.

In the sector's view there are two insurmountable difficulties with the proposed Framework:

1. The proposed content fails to make appropriate commitment to, and fails to stipulate an appropriate volume of, practical activity to make a significant impact on Social and Economic Exclusion in the region.
2. The development of the document has been inappropriately dominated by the managerial concerns of the principal CFOs. This has caused the needs and opportunities for Inclusion work in the region, and the voices of those with expertise on the issues, to be overlooked. As a result the programme is skewed away from those most in need and the debate on those needs and ways of addressing them is **covered up**. Thus the resulting Framework fails, in our view, to properly direct the CFOs to act on the needs of the region.

As a result we feel the proposed Framework cannot be endorsed. It should be remitted for re-drafting by the RMC under terms of reference that explicitly exclude consideration of the CFOs' business and procurement practices until after regional needs have been scoped.

You will know from my discussions and correspondence with the previous Regional Director, Jonathan Lindley that we take this action with a heavy heart. The sector has tried, over a period of more than two years to feed in the well-established success of the Community Empowerment Strategy undertaken throughout the last Programme in the region.

Although the text (p14) recognises the importance of the Community Empowerment methods, it falls short of a commitment to any level of actual activity. Without this explicit commitment, on the basis of experience over the last two years, we can have no confidence that there will be **any** actual Community Empowerment action in the future.

In the sector we have proven and documented methods, models and expertise in achieving Social and Economic Inclusion derived from that strategy's recognised successes. It is particularly galling that we cannot bring them to bear in the region when most partners agree that the region could benefit from action with this approach. In fact, privately, and unfettered by external constraints, it seems we might even agree (somewhere in the 10% - 14% range)

a scale for this sort of action within the ESF Programme. However that discussion is silenced by the imperative to fit within pre-determined limits of the “business agenda and procurement practices” of the CFOs.

It would seem to us much more open, democratic and strategic to scope and publish the regional need and required volume of response in the Framework as the over-arching document delineating ESF action. In reply the CFOs could, if that is their real position, indicate if they are unable to procure that activity. Then the regional partnership (and if necessary the wider ESF system) could properly address the real issue of how to commission what is needed.

However, the current process has the effect of inscribing the supposed limitations of the CFOs’ current methods within the Framework, skewing it in such a way as to suppress that, very necessary, discussion. This - in turn - seems to us call into question the purpose of a Framework, and beyond that the substance of the partnership approach to developing regional ESF strategy.

Thus we are led to oppose the existing proposed Framework on grounds of both structure and content.

I would happy to meet with you to discuss ways forward from this impasse.

Yours sincerely,

Laurie Moran

CEFET CEO

Vice-Chair, OEM

Regional VCS Social Inclusion Policy Champion

**TEXT OF LETTER FROM STEPHEN HILLIER, REGIONAL DIRECTOR - GOEM
IN REPLY TO THE ABOVE**

Dear Laurie,

Draft East Midlands ESF Framework 2011-13.

Thank you for your letter of 17th December. It is with regret that we note that CEFET does not feel able to endorse the Draft regional ESF Framework. As you are aware, as you were fully involved in the Drafting Group delegated to produce the draft for consultation on behalf of the Regional Monitoring Committee (RMC), no other partners supported the proposition you put forward in respect of ring-fenced allocations for “community empowerment” activities. However, the group did go some considerable way to accommodate, and recognise, the issues you raised through a strengthening of the commitment to seek to use such community empowerment approaches where appropriate and practicable. The full RMC subsequently received and endorsed the Framework.

Given that all sectors and CFOs in the regional partnership, with the exception of CEFET, have endorsed the Strategy, as drafted, we do not consider there to be case for seeking a re-draft. We have therefore submitted the draft Framework to ESFD for consideration against the Operational Programme by the agreed deadline of 31st December. This submission was accompanied by your letter.

Whilst you have expressed your concerns on a number of occasions with regard to the delivery of ESF in England through the CFO mechanism, you are aware that this is the approach supported by Ministers and endorsed by the European Commission when they agreed the Operational Programme for the 2007-2013 period. It would seem, therefore, more productive for us to consider how we can best ensure the engagement of the VCS sector in the delivery of ESF in the East Midlands region going forward than to continue to raise objections to an approach which seems likely to prevail for at least the remainder of the current programme.

Yours sincerely,

Stephen Hillier

**TEXT OF LETTER FROM CEFET TO STEPHEN HILLIER, REGIONAL DIRECTOR – GOEM,
CLARIFYING THE SECTOR'S POSITION IN RESPONSE**

Stephen Hillier
Regional Director
Government Office East Midlands
The Belgrave Centre
Stanley Place Talbot Street
Nottingham NG1 5GG

20th January 2010

Dear Stephen,

DRAFT EAST MIDLANDS ESF FRAMEWORK 2011-13

Thank you for your letter 12th January, which I am happy to post on our Website along with the original open letter outlining our objections to the ESF Framework, and this response. I am sure you will want this to happen and will proceed, unless you have any objections, next week.

I think at this stage it is important to clarify some points that arise out of your letter in greater detail, and to explain the full extent of the problems the sector has with the Framework.

First a minor point, it is not just CEFET but the entire sector that opposes the Framework. CEFET is explicitly writing on behalf of One East Midlands, the Regional Infrastructure Consortium and the Grass Roots Network. CEFET briefs and is mandated by all these channels. Further we have conducted a full and open consultation with the sector on the response to the Framework and have had not had a single dissenting voice from the substance of the objections cited in our original letter, nor to the resolve to pursue the issue.

Secondly, there is the issue of the strengthening of the Framework to encourage the use of Community Empowerment approaches. While it is true that some new wording has been introduced into the Framework itself we can find no advance on the terminology used in the 2007 Framework Consultation or in the undertakings made to GOEM by the CFOs following the “disappearance” of the sector’s response to that consultation. As you will have been briefed, the sector has been pursuing an account of the impact of those undertakings for over a year and the last RMC finally received a report. That report contained no evidence of any Community Empowerment activity whatever being present in the Programme despite commitments having been given to use

it “where appropriate”. Therefore the sector has no basis for any confidence that the insertion of this “strengthening” will in any way shape the programme to regional needs in this respect.

Finally I come to the most serious issue, and that is the way in which the Framework has been constructed, and the questions this raises for partnership and strategic planning in the region.

The sector has never questioned the *principle* of Co-Financing, and is aware of ministerial commitment to it. However we are unaware of any ministerial assent, or EU agreement, to the idea that the managerial comfort or procurement methods of specific CFOs should be the decisive concern in shaping regional programmes. This has been offered as the explicit, practical, reason for not requiring a specific level of Community Empowerment proportionate to regional need. The sector takes the, not unreasonable, view that this is precisely the purpose of the Framework, literally setting the Frame within which CFOs should design their method of procuring the programme. Indeed procurement officers at one major CFO assure us that if the Framework were to make such a stipulation they would find a way to comply. Indeed attributing primacy to the working practices of CFOs seems to us to be both un-strategic and to risk rendering the Framework and the Partnership redundant. Most important it limits the Programme’s capability to deliver the ESF stated aims, particularly in moving the hardest to reach towards the Labour Market. It is to this aim which Community Empowerment has contributed proven exceptional results in our region in the past, the vast majority (it must be said) within a Co-Financing environment.

Naturally the sector wishes to engage fully in the ESF Programme in the region, however the manner of development and the content of the new Framework seem to *contradict* precisely that involvement, and to undermine our full participation “at every level of planning, especially the regional” guaranteed by the Regulations. To say that the sector feels “disregarded” in this respect is a diplomatic understatement of the highest order, and this situation does not form a proper basis for delivery on what are shared objectives of both the sector and the fund.

We are still working to those shared objectives and would welcome a meeting to develop practical ways of taking the matter forward.

Yours sincerely,

Laurie Moran
CEFET CEO
Vice-Chair, OEM
Regional VCS Social Inclusion Policy Champion