



This guidance booklet focuses on the administrative procedures and requirements that must be put in place for the animation and administration of the LEADER programme for each Local Action Group (LAG).

The guidance contained in this booklet complements the requirements set out in the service level agreement between accountable body and Scottish Government. This guidance forms part of a phased release relating to the LEADER programme 2014-2020.



**Scottish Rural
Development
Programme**



SCOTTISH GOVERNMENT | AFRC: Food, Drink and Rural Communities | FDARC: Rural Communities | Rural Communities Team | B1 Spur | Saughton House | Broomhouse Drive | Edinburgh | EH11 3XD

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1. The Local Action Group

1.1 Key Responsibilities

The key responsibilities of a local action group (LAG) and its members are set out in European Commission regulations.

Article 34 of the Common Provision Regulation 1303/2013. states:

1. Local action groups shall design and implement the community-led local development strategies.

Member States shall define the respective roles of the local action group and the authorities responsible for the implementation of the relevant programs, concerning all implementation tasks relating to the community-led local development strategy.

2. The managing authority or authorities responsible shall ensure that the local action groups either select one partner within the group as a lead partner in administrative and financial matters, or come together in a legally constituted common structure.

3. The tasks of local action groups shall include the following:

- (a) building the capacity of local actors to develop and implement operations including fostering their project management capabilities
- (b) drawing up a non-discriminatory and transparent selection procedure and objective criteria for the selection of operations, which avoid conflicts of interest, ensure that at least 50 per cent of the votes in selection decisions are cast by partners which are not public authorities, and allow selection by written procedure
- (c) ensuring coherence with the community-led local development strategy when selecting operations, by prioritising those operations according to their contribution to meeting that strategy's objectives and targets
- (d) preparing and publishing calls for proposals or an on-going project submission procedure, including defining selection criteria
- (e) receiving and assessing applications for support
- (f) selecting operations and fixing the amount of support and, where relevant, presenting the proposals to the body responsible for final verification of eligibility before approval
- (g) monitoring the implementation of the community-led local development strategy and the operations supported and carrying out specific evaluation activities linked to that strategy

4. Without prejudice to point (b) of paragraph three, the local action group may be a beneficiary and implement operations in accordance with the community-led local development strategy.

1.2 Membership

Your LAG must be broadly representative of stakeholders and drawn from across the local area. LAGs (or delegated subgroups) must have a reasonably-balanced representation of the following for any project assessment or approval:

- public sector organisations
- businesses/third sector organisations
- community interests

Your LAG can be defined as the overall partnership that delivers a multi-funded local development strategy (LDS) or a subset of the overall partnership that is devoted to the delivery of the European Agricultural Fund for Rural Development (as opposed to the European Marine Fisheries Fund).

Delegated sub-groups must be recorded in the LDS business plan as part of the overall decision making framework. These may include Fishery LAGs

The public sector representation must not exceed 49 per cent of the make-up of the LAG or sub-groups.

1.3 The accountable body

The accountable body is nominated by the LAG to provide for the animation and administration of the LDS.

‘Animation’ refers to activities that stimulate local interest in rural development, bringing forward ideas and projects. This will be done through the LDS.

The accountable body has delegated responsibility for administering LEADER finances under the terms of the service level agreement with the Scottish Government.

1.4 Relationships between the accountable body and the LAG

Clarity about respective roles and responsibilities is essential to make sure that the relationship between the accountable body and the LAG works well. Critically, the LAG needs to understand that it has a role to play in working with the accountable body to ensure sound financial management of the LEADER programme.

The LAG and accountable body should agree how they will work together on issues such as staffing, accommodation, travel and subsistence from the outset. This could be through the constitution or memorandum of understanding to which all of the members, including the accountable body, sign up.

1.5 Conflicts of interest

Conflict of interest is commonly defined as a situation that has the potential to undermine impartiality due to the possibility of conflict between individual or collective self-interest, professional interest or public interest.

The LAG must:

- hold an up-to-date register of interests of LAG members

- make sure that no close relative of an individual applicant or an employee or representative of an organisation applying for funding can:
 - (i) participate in the LAG decision making process
 - (ii) score an application from that applicant (which, for the avoidance of doubt, may include the accountable body)
 - (iii) be involved in any monitoring activities relating to the applicant

The meeting chair (or LAG chair) make sure that minutes of LAG meetings record when a conflict has been raised and the steps taken. The chair will have ultimate responsibility to resolve any conflict of interest questions or queries, regarding a LAG member's right to be involved in the decision-making process and right to vote.

1.6 Gifts and hospitality

No LAG member (including representatives or employees of the accountable body) may accept or offer gifts, hospitality or benefits to or from a third party that might be seen to compromise their personal judgement or integrity in carrying out their functions under the LEADER programme. In cases of doubt, LAGs should consult with the managing authority.

1.7 The LAG chair

To ensure transparency of process and separation of functions, the chair of any decision making body and / or overall partnership associated with the LDS must be completely independent. This means they cannot be an employee or representative of the accountable body, such as a board member or elected member.

1.8 LAG meetings

- 1 LAG meetings may be undertaken face-to-face or remotely at times that suit members.
- 2 All meetings must be fully minuted with complete records retained and uploaded onto the LARCS system, once operational.
- 3 Where a LAG member has a registered interest in a project for discussion, the member must declare this interest prior to the discussion of the project at the meeting.
- 4 Members are required to treat discussions, documents and all other project information as confidential. Project information is confidential until the project has been fully approved. However, some information may need to remain confidential after approval, such as tenders, child disclosure or personal information.
- 5 Special meetings may be called at any time if the LAG chair receives a request from partners setting out the purpose of the business to be considered at that meeting.
- 6 Any decision-making bodies associated with the LDS or LAG meetings must have a minimum of five members present, and respect the 49: 51 rule.

2. Staff recruitment and setting up the office

2.1 New LAG staff

The LAG may have to recruit new staff to support the LAG / FLAG in implementing the LDS. If you do need to recruit new staff then it must be done in an open and transparent way.

Firstly, any recruitment (either internally to or externally from the accountable body) must involve other LDS partners in the selection process, with any decisions on recruitment being shared between the LAG and the accountable body.

Secondly, any external recruitment must be openly advertised. It is strongly recommended that any vacancies are advertised on the Scottish Rural Network website as part of the process.

Please email: scottishruralnetwork@scotland.gsi.gov.uk

As posts are filled, the accountable body must inform the managing authority. Once all posts are filled, the managing authority will then be able to send the accountable body a template to capture team details.

The following evidence must be provided to the managing authority:

- copy of the advertisement and details of where the post was advertised
- summary of the short-listing process
- summary of the interview process
- details of selected candidate
- evidence that the LAG has been involved in the selection or approval of the appointment

The recruiting body is responsible for compliance with data protection legislation when providing information.

2.2 The use of accountable body internal staff

Where an existing staff member provides LAG-specific activities for part of their contracted hours through either increased working hours or a change in job description, the accountable body must provide:

- evidence that the staff member's role has changed when they started working for the LAG through the provision of old and new job descriptions
- evidence that the person has the relevant skills for the project requirements and is the most suitable person if more than one staff member could fulfil the function
- details of the selected candidate
- evidence that the LAG has been involved in the selection or approval of the appointment
- a signed job description and contract which details that they are solely involved in community led local development (CLLD) activity should be retained and made available for audit purposes

2.3 Existing LAG staff transferring to a new post or existing staff remaining in the same post transferred across to the new programme.

If it is a new post or the same post continuing from the 2007-2013 programme which the accountable body or LAG wish to fill by the reappointment of an existing staff member in line with national employment legislation, this must be explained in the LDS business plan.

The partnership between staff and the LAG is critical. Therefore, when existing staff are being transferred from the 2007-2013 programme, there must be clear documentary evidence that the LAG and Accountable Body agree that the staff continue in post.

Where the accountable body has an existing policy regarding reappointment of staff this should be provided as part of the justification.

Where an existing member of staff is transferred to a new post to the new programme the accountable body must provide:

- evidence that their existing post is finishing
- evidence that the person has the relevant skills for the post and is the most suitable applicant if more than one internal applicant is eligible
- details of the selected candidate
- evidence that the LAG has been involved in the selection or approval of the continuation of the existing staff member

The recruiting body is responsible for compliance with data protection legislation when providing information.

Where an agreement cannot be reached on the continuation of Existing LAG Staff in creation of the 2014-20 LAG the Accountable Body as the employer must follow their own normal HR procedures regarding Staffing. There is no obligation for the LAG to retain staff from the previous programme, but it is hoped that the skills and expertise that already exists in the LDS areas are maintained.

2.4 The location of your LAG team

Careful consideration should be made when deciding upon the location of your LAG office. Getting this location correct is important and one that deserves careful thought.

The LAG must agree the location with the accountable body.

3. Operation

The 2014-2020 programme period offers an opportunity for LEADER to use various simplified costs options for the administration of LEADER. The Scottish Rural Development Programme provides for this and it is the managing authority's intention that we develop a model over the coming years.

Until then, we will continue to base all costs associated with the administration and animation of the LDS on the basis of actual expenditure (as with the 2007-2013 LEADER programme).

3.1 Evidencing expenditure

All expenditure must be supported by a fully transparent audit trail through to bank statements, including transaction lists, invoices and BACS listings. In certain circumstances, and with prior agreement of the Scottish Government, documents of equivalent probative value may be accepted.

- salaries must be supported by payroll records, BACS lists and bank statements
- where original documentation is available only in electronic format, print-offs or 'screen shots' must be retained
- a properly vouched audit trail of all payments with respect to activities and / or investments made in relation to the running cost and animation of the LDS must be maintained

All expenditure **must** be incurred and defrayed (i.e. left the bank account) before it is included in any claim from the Scottish Government.

See Annex 2 for comprehensive details relating to eligible / ineligible expenditure.

3.2 Spending on running costs and animation

Support for running costs and animation must not exceed 25 per cent of the total public expenditure, incurred within the community-led LDS.

European Agricultural Fund for Rural Development (EAFRD) and European Marine Fisheries Fund (EMFF) – combined for multi-funded LDS.

For multi-funded LDS, EAFRD is the lead fund and will support the costs of animating/administering the EMFF related elements of the LDS.

Animation can be delivered directly by LAG staff or contracted to external parties. The LAG are required to report animation and running costs separately.

Annex 1 sets out guidance on animation functions.

For LDS which involve EMFF-related activity animation in relation to this fund are also eligible. All expenditure relating to this must also meet the eligibility criteria set out in this guidance. The costs relating to this function must be recoded separately to the animation relating to LEADER-based activity.

3.3 Procurement

A change from the previous programme is that all LAG and project expenditure must be procured using the Scottish Government Procurement Policy. **The use of any other policy will be classed as irregular and potentially result in financial penalties.**

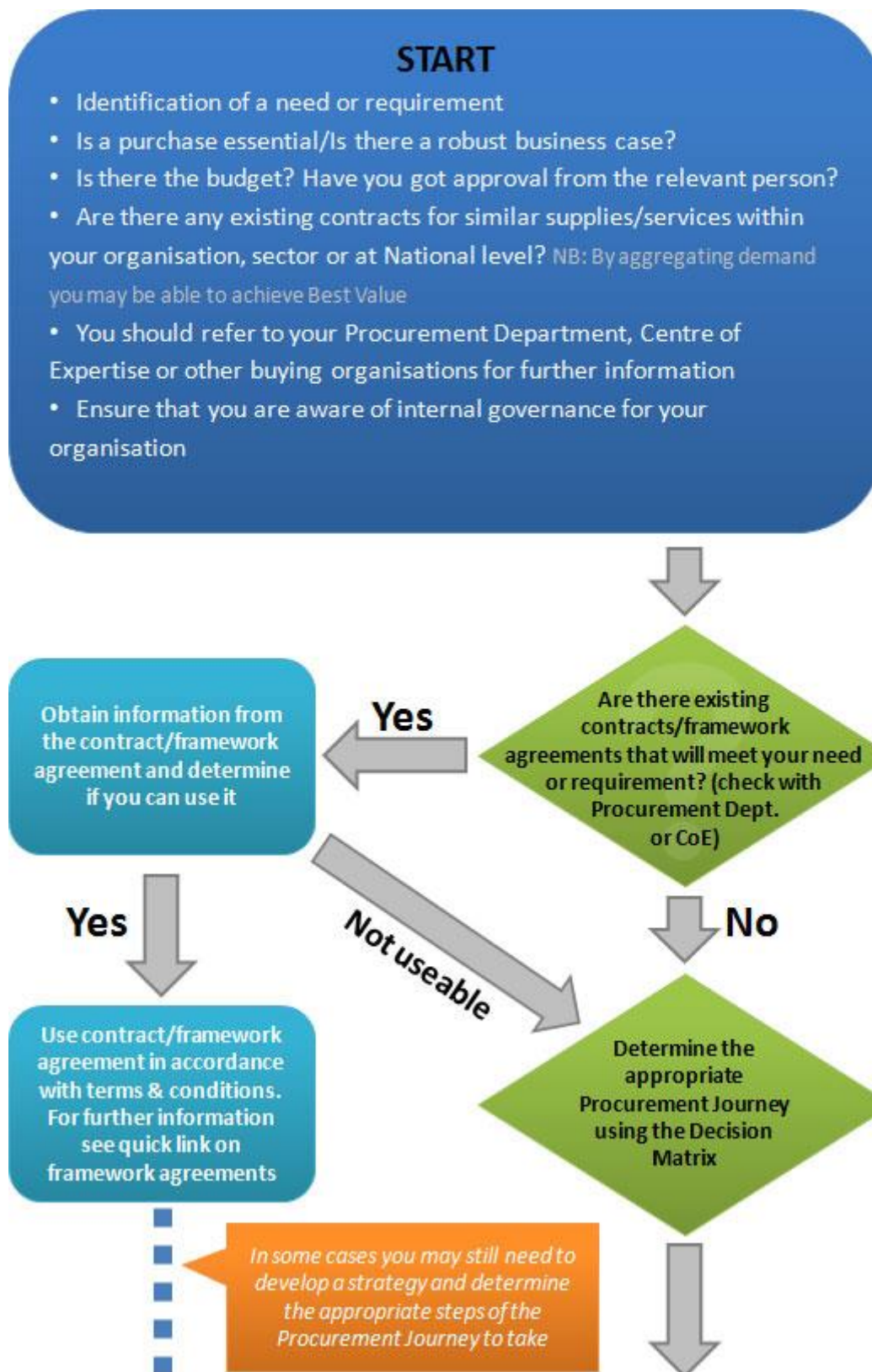
Any procured good or service required to administer / animate the LDS must be purchased following the Scottish Government Procurement Policy. It is possible to carry forward equipment, such as IT, from the previous programme. If this is the case then a clear inventory of those items should be retained

Accountable bodies should pay particular regard to and comply with the thresholds for publishing invitations to tender in the Official Journal of the European Union and (Scottish) national procurement rules.

Contracts must either be competitively tendered or procured in line with Scottish Governments procurement policy to ensure value for money.

The Diagram below will help you decide the appropriate journey of procurement to purchase what you require. If you have any doubt please contact the Scottish Government LEADER Team which will assist in selecting the correct journey.


Before you proceed please ensure that you have your **organisation's authority** to procure goods and or services on their behalf.



Decision Matrix

These notes are intended to provide **guidance** for determining the appropriate Procurement Journey. If you are in any doubt of which route to use please contact your Procurement Dept or Centre of Expertise (CoE). This decision is based on the balance of costs and risk associated with your procurement exercise (please be aware of internal governance arrangements).


Estimated value of requirement - What is the anticipated total spend over the lifetime of this requirement? e.g. acquisition cost, ongoing cost, support costs etc.



Points	Estimated value of requirement
1	Up to £50,000
2	£50,000 to £350,000
3	Greater than £350,000


These figures are advice /guidance. You must also consider if your internal policies would require a different level to be applied.

Potential Risk – What is the level of risk associated with the delivery of this requirement?



Points	Potential risk
1	Low
2	Medium
3	High

Adequate Publicity – Does the requirement need to be advertised e.g. Identify suppliers, or attract suppliers from a wider supply base. Internal policies and procedures and or Public Contract Scotland Regulations SPPN 04 2009 may require you to advertise.

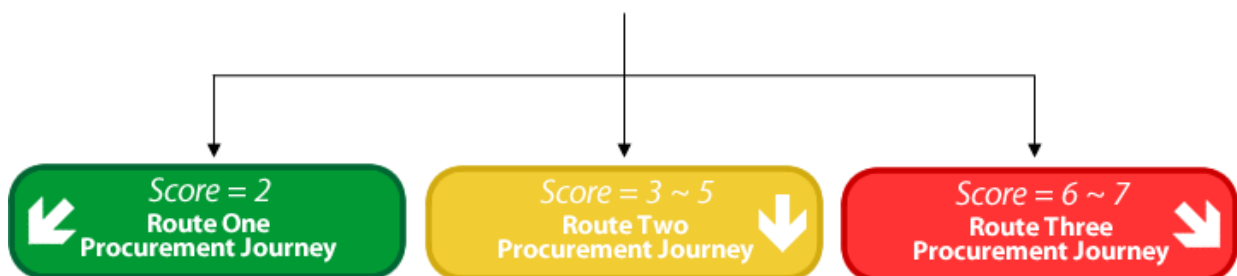


Points	Advertising
0	No
1	Yes

Determine the Procurement Journey Route – In order to determine the appropriate Procurement Journey (Route 1, 2 or 3) you should add together the points for each stage and then refer to the table below



Total Score	Route for Procurement Journey
2	Route 1
3-5	Route 2
6-7	Route 3



Once you have decided upon a route to take follow the web link below which will expand in detail the appropriate steps and documents required:
<http://www.gov.scot/Topics/Government/Procurement/buyer-information/spdlowlevel>

4. Storing Information

4.1 *Filing case documents – creating and maintaining a physical file*

All expressions of interest should be held centrally as they will not be entered on the LARCS system until a full application is received.

While grant applications and supporting documentation will be recorded and held on LARCS, any documents that are intended to create legal rights and obligations – such as grant award letters, contracts and undertakings etc – which are still physically signed, must be retained as hard copies.

The master file (hard copy) must contain the audit trail of all key original documents as described above. This includes all documents that were part of the decision-making process leading to funding approval, withdrawal or rejection of a LEADER case, and any decisions thereafter (e.g. change requests and inspections).

An index must be kept in the front of the file that identifies key documents such as the LAG assessment and the signed copy of the contract.

As the file contains personal data you must follow your organisation's file storage requirements, particularly around data protection and secure storage. Computer-based protocol on LARCS is covered by the Scottish Government.

Remember that, for audit purposes, the definitive version of a document must be held in the master file.

Although superseded documents are also to be held on file, they should be marked as “Superseded by version of <<dd/mm/yyyy>>”.

All new physical files created must be recorded in a record management system appropriate to each organisation.

- a physical (paper) file must be created using file covers with “<<LAG name>> and LEADER 2014-2020” on the front. All documents / correspondence must be filed on the physical file
- files must be clearly marked on front and spine: with the applicants' organisation, project title, business reference number), and project reference number
- files should be split into marked sections using indexed dividers
- each section must be clearly separated using indexed dividers with Section 1 at the back of the file cover and all papers within each section sequentially numbered in the top right hand corner, e.g. ./1, ./2, ./3 etc
- poly-pockets are not suitable for physical files
- if one file cover / part is impractical due to the volume of paperwork, then the additional paperwork should be placed in a separate file cover attached to the 'main' file cover. This may be more relevant for expressions of interest

covering multiple items. In the section on the file cover for 'volume', files should be marked 1 of 1, 1 of 2, etc

Section 1 – expressions of interest

Section 2 – application including associated site visit if any, project plan and quotes (this must include the technical assessment, pre-approval correspondence to both LAG members and business reference number allocation).

Section 3 – consultation responses

Section 4 – consents

Section 5 – scoring details and evidence of LAG approval

Section 6 – offer of grant contract, including terms and conditions, acceptance of grant etc

Section 7 – post-approval correspondence

Section 8 – claims and payments

4.2 Case file retention period

Case files will be retained for seven years from the end of the current Scottish Rural Development Programme.

The following must be maintained:

- a local record must be maintained to record the location of all relevant records
- all records must be maintained, as a minimum, by the accountable body for a period of three years following the European Commission's formal closure of the Scottish Rural Development Programme and for six years from the end of the financial year during which final payment in relation to those activities was made, or 10 years where the funded activity related to the purchase of heritable property
- where a case has not progressed beyond an expression of interest status, and a calendar year has elapsed since the applicant last updated the case, the LAG officer should arrange for a letter to be sent to the applicant (or their agent) to determine if the case should be closed. If so, the file should be retained for seven years

5. Publicising the LAG

5.1 Acknowledgement of funds

It is a condition of LEADER funding, including the operation of the LAG, that the contribution of LEADER funding is appropriately acknowledged both during the implementation of the LDS and as a permanent record. Failure to do so will be considered as a breach of the LDS award.

You will have detailed in your business plan how you will acknowledge the support of LEADER funds to the LDS. Where appropriate the costs for acknowledgement of funds can be included in your administration claim.

Compliance with these requirements will be checked during LAG monitoring visits.

5.2 The logo

The logo that must be displayed is made up of six components:

- a) the European Union emblem
- b) the statement 'The European Agricultural Fund for Rural Development: Europe investing in rural areas'
- c) the Scottish Government emblem
- d) the Scottish Rural Development Programme emblem
- e) the LEADER emblem
- f) the local action group emblem or name

This logo is referred to as the LEADER funding logo.

The LEADER funding logo has been specifically designed to meet regulatory requirements. It must not be altered or distorted in any way.

5.3 Wording

There is standard wording that must be displayed along with the LEADER funding logo.

For LAG activity, e.g. the LAG office, temporary display signs, recruitment advertising, scheme guidelines, posters etc

“[Insert LAG Name] LAG is being part-financed by the Scottish government and the European Community LEADER 2014-2020 programme”

The typefaces (fonts) that can be used for the wording are: Arial, Auto, Calibri, Garamond, Trebuchet, Tahoma, Verdana, Ubuntu. The colour of the font must be reflex blue, black or white depending on the background. Italic, underlined variations or font effects should not be used.

The positioning of the text in relation to the LEADER funding logo must not interfere with the logo. The font size used must be proportionate to the size of the LEADER funding logo.

5.4 Display requirements

The LEADER funding logo must be displayed in colour whenever possible and a monochrome version may only be used in justified cases. It must always be clearly visible and placed in a prominent position.

On printed materials, its position and size should be appropriate to the scale of the material or document being used. Suggested guidance on sizing requirements:

- material up to and including A5 in size: 16mm in height
- material up to and including A4 in size: 24mm in height
- material up to and including A3 in size: 30mm in height

It must be visible when landing on a website inside the viewing area of the device. Websites detailing projects supported by LEADER funding and/or websites developed with the support of LEADER funding must include links to the Scottish Government Leader page and the Scottish Rural Network website.

If other community led local development CLLD funders logos are displayed as well as the LEADER funding logo, each of the individual emblems in the LEADER funding logo shall have at least the same size, measured in height or width, as the biggest of the other funders' logos.

5.5 Printed materials

The LEADER funding logo and wording must be clearly visible on any printed materials related to the project for at least the life of the grant contract. Examples of materials include leaflets, invitations, posters, tender documents, T-shirts and balloons.

The LEADER funding logo and wording must also be on any permanent or longer-lasting products of the LAG, including websites, DVDs, training materials and interpretation boards.

When advertising a job vacancy funded (partially or fully) by the LAG, the LEADER funding logo and wording must appear in the advert. If the size or nature of the advertising space will not allow the inclusions of the LEADER funding logo, only the wording can be used.

Electronic copies or photographs of all materials acknowledging LEADER support must be retained for audit purposes.

5.6 Infrastructure

The LAG office must have signs acknowledging LEADER support that are visible to the public throughout the life of the 2014-2020 programme

There are specific minimum requirements that apply depending on the total public funds contributed to LDS. To meet the publicity requirements proportionate of the LDS award, a billboard of significant size explaining CLLD and the LEADER programme must be constructed in a publically visible place.

Each display form must detail:

- the name of the LAG
- the main objective of the LAG
- the LEADER funding logo
- the appropriate wording
- the financial allocation of LEADER

The section of the display containing the LEADER funding logo and wording must be at least 25 per cent of the total area of the display.

The LAG is responsible for obtaining all legal approval or permission required for installation of any signs, plaques, billboards or other items for acknowledgement of funds.

5.7 Events and general participant activities

Funding support from LEADER must be appropriately acknowledged during any LAG event, for example meetings, training events and workshops. The LEADER funding logo and wording must be on all printed materials. For example, invitations, programmes and brochures. The LEADER funding logo must also appear on any presentations including PowerPoint presentations used during the event.

Finally, LEADER funding support must be acknowledged verbally during the event.

5.8 Equipment

The LEADER funding logo and wording must be displayed where possible on:

- any capital item (non-consumable, physical items) purchased for more than £150
- any capital items that are used to support the delivery of the LDS, which have an operating cost and where these costs are charged to the Scottish Government during the programme period

5.9 Press releases

Any press releases relating to the LAG must make explicit the support of LEADER funds. Press releases must be retained by the LAG for audit purposes.

6. *Annex 1 animating your local development strategy (LDS)*

Article 35, 1303/2013 – Common Provisions Regulation sets out what support for community-led local development will cover:

(e) animation of the community-led local development strategy in order to facilitate exchange between stakeholders, to provide information and to promote the strategy and to support potential beneficiaries with a view to developing operations and preparing applications.

Animation is about mobilising, empowering and involving local people in community-led local development and, specifically, the delivery of the local development strategy.

Animation refers to activities that stimulate local interest in rural development, bringing forward ideas and projects. It includes informing, supporting and co-ordinating the activities of stakeholders that make up the local community and is an important means by which under-represented groups can benefit.

Animation can include activities that:

- facilitate or stimulate community initiative and ideas
- increase community awareness, activity and participation
- builds networks and structures for information sharing and co-operation within and between communities
- fosters the development of the confidence, understanding and skills needed for undertaking economic development actions and projects
- encourages the development of innovative projects, collective projects and projects from harder to reach groups that will contribute to the LDS
- supports potential beneficiaries through the process of applying for a LEADER grant
- promotes the LDS and raises the profile of LEADER

7. Annex 2 eligible expenditure animation and running costs

7.1 Direct staff costs

All staff costs included in the LAG should be in accordance with the following conditions:

staffing costs should include gross pay, employer's National Insurance and superannuation contributions. Only **actual costs staff costs** can be included in claims

- there must be a clear audit trail for staff costs through payroll records, via BACs to the bank statement
- consultancy fees and sub-contractor fees must **not** be included in staff costs

7.1 Staff travel

Staff travel costs must be directly related to LDS implementation. Certified travel claims must be retained. Actual costs up to a maximum of mileage at the rate per mile of the relevant accountable body or standard / economy class travel on public transport must be claimed.

7.2 Costs for premises

The actual cost of rent, rates, utilities, telephone / internet, cleaning and service charges associated with the premises can be claimed where it can be clearly demonstrated these are directly related to the operation of the LAG and are additional.

- where the LAG is situated in a larger office – it is possible to apportion costs. If this is done, there must be a clear methodology as to how this has been calculated
- costs that are estimated must be determined by an apportionment method that relates to the delivery of a project

For example, an office contains four desks, one of which is used for the project. The rent, rates and utility bills are all apportioned so that 25 per cent of those costs are included as eligible costs to the operation (project).

This must be evidenced by an apportionment method applied to details from invoices or bills and bank statements.

7.3 Insurance

Insurance of buildings, contents and for public liability are eligible provided it can be clearly demonstrated that these directly relate to the running of the LAG.

7.4 Other eligible LAG costs

This may include software, stationery, teaching materials, postage, photocopying consumables and other reasonable costs, where it can be clearly demonstrated that these are directly related and essential to the delivery of the LAG.

7.5 *Staff ineligible costs*

The following staff related costs are NOT eligible:

- staff that are not involved in LDS delivery for 100 per cent of their contracted hours
- staff not directly attributable to project delivery
- payments for unfunded pensions
- bonus or commission payments
- expenditure defrayed out with the LEADER programme period.
- costs related to research or studies carried out in respect of the CLLD community led local development prior to the official LDS start date
- gifts
- costs that are a statutory requirement, and reclaimable by the accountable body, i.e. statutory maternity / paternity pay, statutory sick pay