



Circular No: 08 - 2020
From: LEADER Policy and Operations Unit
To: All LAGs and Implementing Partners
Date Issued: 30th April 2020
Subject: Date Stamping of Documents/Application Form
Signatures and other administrative issues

This circular is being issued as a response to issues that some LAGs and their Implementing Partners are facing as a result of the Covid-19 virus situation and to enable the business of the LAGs and their IPs to carry on in as far as is possible in these unprecedented times. LAGs and IPs are reminded to review the content of previous circulars, particularly Circulars 04/2020 and 05/2020 for flexibility already granted regarding related issues.

This Circular provides flexibility on the following items:

- (i) Insertion of the date of receipt on a document instead of using of a date stamp.
- (ii) Amendments to project application forms and other documents.
- (iii) Electronic signatures.
- (iv) Timesheet and Travel & Subsistence claim approval.
- (v) Extension of sunset clause for provisional approval for procurement and planning permission.
- (vi) Erecting of signage.
- (vii) Conducting of site visits prior to the signing of contracts/letters of offer.
- (viii) Written Procedure Voting by LAG Decision Making members.



Owing to the difficulties posed by the Covid-19 virus, and from the commencement of this crisis (effectively 16th March 2020) until further notice the following administrative processes will apply:-

i. Insertion of the date of receipt on a document instead of using a date stamp

In instances where the date stamping of a document is not possible, the LAG/IP staff member processing the document must write “Date of Receipt” and insert the receipt date and their accompanying signature on the front page of the document, before uploading it to the LEADER IT system. Such documents must be inserted in the project file when circumstances permit.

Where a document is received electronically, the accompanying email will act as the proof of date of receipt and must be uploaded to the LEADER IT system with the relevant documents. Such documents must be printed down and inserted in the project file when circumstances permit.

The LAG/IP staff member must also enter a comment in the project or claim Notes section on the LEADER IT system identifying the documents that have not been stamped due to Covid-19 and their relevant date of receipt.

ii. Amendments to project application forms and other documents

In instances where amendments are required to be made to project application forms or other documents such as project claim forms or project assessment reports, the Department has decided to permit amendments by email. The email must identify the document and the relevant section to be amended, details of the original and amended text. The email must be sent from the email account of the person who is authorised to make the change.

The emails must be retained for audit trail purposes and uploaded to the LEADER IT system and included on the project file when circumstances permit.

iii. Electronic signatures

Where it is not possible to provide signed original documents such as application forms, project claim forms, project assessment reports, the email from the appropriate party (i.e. promoter, project officer) accompanying such documents will suffice as an electronic signature. These emails must be retained for audit



trail purposes and uploaded to the LEADER IT system and included on the project file when circumstances permit.

Alternatively, an electronic signature from the authorised person(s) on the document is permitted. Such documents must be retained for audit trail purposes and uploaded to the LEADER IT system and included on the project file when circumstances permit.

iv. Timesheet and Travel & Subsistence claim approvals

Where it is not possible to provide hard copy signed work attendance timesheets or signed Travel & Subsistence claim forms, e-mail submission of these by LAG/IP staff to their managers will suffice for signature purposes. These emails must be retained for audit trail purposes and uploaded to the LEADER IT system and added to the administration hard copy file when circumstances permit.

Alternatively, an electronic signature from the authorised person(s) on the document is permitted. Such documents must be retained for audit trail purposes and uploaded to the LEADER IT system and included on the project file when circumstances permit.

v. Extension of sunset clause for provisional approval for procurement and planning permission

Where provisional approval subject to the completion of procurement or planning has already been granted by the LAG, and where the project promoter is unable to complete this process due to the Covid-19 crisis, the LAG Authorised Officer may approve an extension to the sunset clause by up to 3 months. The LAG Authorised Officer must note such extension in the comment box on the project application on the LEADER IT system. It should be noted that all projects must be fully approved for LEADER funding by 31st December 2020. A copy of the request and approval must be included on the project file and uploaded to the LEADER IT system when circumstances permit. Such approvals must be noted in the minutes of the next LAG Meeting.

vi. Erecting of signage

The Department authorises the processing and payment of claims for capital projects without the erection of signage, where this is currently not possible due to the Covid-19 virus. A note confirming the postponed erection of signage due to the difficulties posed by the Covid-19 virus must be placed on the project file and uploaded to the LEADER IT system. The note must confirm that the signage



will be erected and photographic evidence uploaded to the LEADER IT system when circumstances permit.

vii. Conducting of site visits prior to the signing of contracts/letters of offer and conducting site visits at claim stage.

Article 6 of Commission Implementing Regulation (EU) 2020/532 of 16 April 2020 allows for a derogation from Article 48(5) of Implementing Regulation (EU) No 809/2014, “*where due to the measures put in place to address the pandemic of COVID-19 Member States are not in a position to carry out any visit to the operation supported or the investment site before granting the final payments, Member States may decide to substitute such visits, as long as those measures apply, by any relevant documentary evidence, including geotagged photos, to be provided by the beneficiary. If those visits cannot be substituted by relevant documentary evidence, Member States shall carry out those visits after the final payment is effected.*”

Pre-Commencement Site Visits

In respect of the site visit requirement prior to the issue of contracts/letters of offer (Section 8.2 of the Operating Rules for the LEADER Programme 2014-2020) the Department authorises the acceptance of digitally dated photographs provided by the project promoter as evidence that the project has not commenced. Such photographic evidence must be supported by the project promoter’s declaration that the activity has not commenced, as required by Section 8.2 of the Operating Rules for the LEADER Programme 2014-2020. Photographs must be uploaded separately to the LEADER IT system and placed on the project file when circumstances permit.

Claim Related Site Visits

Where there is a site visit requirement at claim stage, the Department authorises the acceptance of digitally dated photographs provided by the project promoter as demonstrating the required evidence that the project stage has been completed or that the entire project has been completed. Such photographic evidence must be supported by the project promoter’s declaration that the items in the project claim are in place. These two pieces of evidence must be submitted to the Article 48 User for examination.

Whereas the regulation tends more specifically toward site visits relating to claims for payment, LAGs may also choose to include geotagged photographs taken by



project promoters in support of confirmation of non-commencement of activity. In such cases, the attached Appendix 1 - Guidance on Geotagging of Site Photographs, may prove useful.

Photographs must be uploaded to the LEADER IT system and placed on the project file when circumstances permit.

viii. Written Procedure Voting by LAG Decision Making members

Following on from the issuing of ***Circular 05-2020, LAG and Evaluation Committee Meeting attendance***, it has come to the attention of the LEADER Policy & Operations Unit, that due to infrastructure constraints, it is not possible for some LAGs to hold physical meetings or meetings using telephone or video conferencing facilities.

Therefore, the LAG Decision Making Members may decide on project applications for funding by Written Procedure. Decision Making Members who avail of voting using Written Procedure will be counted to meet the quorum requirement of 50% for LAG decisions on funding applications for LEADER projects. Where a LAG Decision Making Member has a conflict of Interest, they should declare this in the Written Procedure voting document supplied to them and they must not vote on the item for which they have a declared conflict of interest.

The requirement that Individual LAG members can only vote by written procedure in a maximum of one out of every four consecutive LAG meetings is being removed until further notice, where a decision on project funding applications is being decided by the LAG.

Please see **Appendix 2** for procedures to be followed where written procedure for deciding on project applications for funding is being utilised by the LAG.

LAGs should continue to engage with the Department on other, specific issues not previously addressed, on a case by case basis.

LEADER Policy & Operations Unit



Appendix 1 – Guidance on Geotagging of Site Photographs

The following information is provided to facilitate the provision and verification of photographic evidence submitted in support of an application for aid (pre-contract, non-commencement of activities confirmation) or a claim for LEADER funding where site visits are not possible during the Covid-19 crisis. Please note that this process is optional, as some promoters may not be able to provide the geotagging information due to technical constraints. However, LAGS may wish to integrate this process where practicable, to support the verification process audit trail.

Using geotagging for photographs taken on an Android or iOS (Apple) phone

Geotagging is the act of including geographical information about where a photo was taken in with the digital photo file. Geotagging is extremely helpful to anyone who needs a way to record exactly where each photo was taken. This applies to outdoor locations e.g. project building sites, walkway locations, as GPS satellites must be available to the record the necessary information on the device.

By default, the camera application on your Android or iOS (Apple) smartphone or tablet has the ability to add GPS coordinates to the image file, but there are a few settings you have to change for this feature to work correctly. Please note that as device setting menus may vary, the following information is provided for general purposes. Otherwise, please consult your device's user manual.

Android Devices

1. Go to your Android device's home screen, then press the "Menu" button. Tap "Settings" to access the settings menu. Some phones don't have a menu button. In such cases, locate your "Settings" icon, which is usually represented by a single or pair of cogged wheels.
2. Scroll down the phone's menu until you find the "Location" option. This location option may be sometimes found under the "Security & Privacy" menu. Tap the "Location" or "Location Security" menu to continue.
3. Tap the option select "Location access" and activate/select "Access my Location". This option must be turned on for the geotagging option to work.
4. Return to the main screen, then tap the camera icon to launch your Android smartphone's camera.
5. Tap the "Settings" icon. On some Android cameras, this option will simply be a small cog icon.
6. Select the "Location" or "Store Location in Pictures," or "Geo-tag Photos," depending on your OS version, and tap that option to activate it. Tap "OK" when you see a message telling you that the GPS function needs to be turned on. Your



photos will now be geotagged with your location as long as your phone can get your position from the GPS satellites.

Note: The geotagging application can be deactivated when not needed.

Apple Devices

Geotagging is enabled on an app-by-app basis.

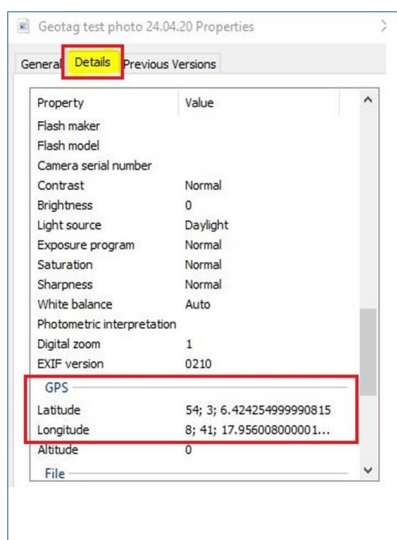
1. To turn geotagging on for the Camera app, start by tapping the "Settings" icon on the iPhone's home screen to launch the Settings app.
2. Tap "Privacy" and then tap "Location Services" to open the Location Services screen.
3. Toggle the virtual "Location Services" switch to the on position and then scroll down and toggle the "Camera" switch to the On position as well. You'll know the switches are turned on when they turn green.

To disable geotagging in the future, toggle the "Camera" switch back to the off position.

Viewing GPS/Geotag Information on an Image File

To view Geotag data on an digital photo –

1. Right click on the image in the relevant folder.
2. Select the Details tab and scroll down to GPS, where the Latitude and Longitude details of where the photo was taken will be displayed.





In the Apple Operating System, right-click the image file (or Control+click it), and select “Get Info.” You’ll see the Latitude and Longitude coordinates under the “More Info” section.

If the GPS details are not present, then the image was taken without geotagging/GPS being activated on the phone or tablet. Many digital cameras (as opposed to phones), do have the geotagging facility and this will also suffice. Where such a facility is absent, the photo must show the time and date properties at a minimum. The site visit report should confirm that the site photo date has been checked by the Project Officer.

Location Verification

The location of the GPS coordinates can be checked via [Google Maps](#) (see [YouTube video](#)). If difficulties arise in confirming GPS coordinates in Google Maps (the input format is important), another option is to upload an image to a photo location website such as <https://www.pic2map.com/>. If using the latter website, tick the ‘keep photos private’ to avoid potential sharing.

Where the project in question has multiple photographs of a location, a sample geotagged photo will suffice for location verification purposes by the Project Officer.

A printout or screenshot of the confirmatory Google Maps or Pic2Map webpage should be uploaded along with the site visit report, and a copy placed on the project file when circumstances permit. The site visit report should confirm that a site photo geolocation check has been carried out.



Appendix 2 – Written Procedures

Procedures to be followed where Written Procedure for deciding on project applications for funding is being utilised by the LAG, **all** of the following must be observed:

- All LAG Decision Making Members **must** be provided with the relevant documentation for each project application to enable them to make their decision and they must be given adequate time to return their Voting ballot to the LAG Authorised Officer;
- The returned voting ballot **must** contain the name and Sector of the LAG Decision Making Member casting the Vote and be dated by that Member;
- The voting ballot **must** contain a section for the LAG Decision Making Member to declare any conflict of interest if appropriate;
- The returned Voting ballots **must** be opened after the closing date and in the presence of the LAG Chair (or Vice-Chair where the Chair is not available or other LAG Decision Making Member) and the LAG Authorised Officer (evidence of this must be provided);
- The decision for each project funding application **must** be recorded in a document showing:
 - the correspondence issued to the LAG Decision Making Members; and
 - the date this correspondence issued to the LAG Decision Making Members and the final date for receipt of Voting ballots by Decision Making Members; and
 - Details of any conflicts of interest declared; and
 - the decision of each LAG Decision Making Member broken down by the Sector they represent; and
 - The Collective Decision of the LAG Decision Making Members; and
 - This document **must** be signed and dated by the LAG Chair (or Vice-Chair where the Chair is not available or other LAG Decision Making Member) and uploaded onto the LEADER IT System; and
 - The result **must** be recorded in the LAG Meeting Minutes.
- The Voting **must** be in line with ***LAG decisions*** as set out in Section 5.3 of the LEADER 2014 – 2020 Operating Rules (see below):



LAG Decisions

For the purposes of securing an inclusive and representative decision-making process, any decisions taken by the LAG must –

- be voted on by at least 50% (rounded up to the nearest person) of LAG members – this applies to decisions validated by the LAG membership after all relevant conflict of interest issues have been addressed; and
- be voted on the basis that at least 50% of those voting on a decision are non-public sector partners; and
- be carried by majority vote; and
- be non-discriminatory and transparent

The Chairperson does not have a casting vote. Where there is a tied vote, a motion is deemed not to be carried.

Decisions taken where the above governance requirements are not met will be deemed invalid. Where the above governance requirements are not in place, the decision should be postponed until such time as these governance requirements are in place.

The minutes of the meeting should record the names of those who attended the meeting physically or by telephone / video conference and those who voted by Written Procedure. In this regard, the **LAG Decision Meeting Attendees form (Appendix 12)** must be used to record attendance and representation details. For projects where there is a conflict of interest, the **LAG Decision Meeting Abstainers form (Appendix 13)** must be completed for each project where a conflict of interest has been declared by a member.

It should be noted that the above permission on Written Procedure relates only to contract extensions and LAG Decision Making Members decisions on project applications for LEADER funding.

This permission to allow voting by Written Procedure is being granted so as to enable the business of the LAG meetings, to continue during this unprecedented situation that we find ourselves.