

Clarification on Non-cumulative Use of EU Funds

Apologies for my confusion on this point (arising from change in the term “beneficiary” since the last programme). The regulation on non-cumulative use of ESIF actually refers to the recipient of the grant (i.e you), not the participants in the project.

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012R0966&from=EN> – See Article 129.

“Each action may give rise to the award of only one grant from the budget to any one beneficiary, except where otherwise authorised in the relevant basic acts. A beneficiary may be awarded only one operating grant from the budget per financial year.”

In simple terms this means that you cannot combine ESIF with other EU funding in your project (in effect, using other EU funding as match).

There is one exception (derogation), whereby Horizon 2020 may be combined with ESIF. Horizon 2020 is funding for research and innovation, which is unlikely to be relevant to your proposal, I think.

Counting of participants – a recording rather than eligibility requirement

There is **no** rule that restricts access to an ESIF project for a potential participant who has previously been supported through another one. However there is a requirement to ensure that a participant is **only counted once** in any one operation. I would assume that BBO is a separate operation but it is worth checking with DWP how they are defining the term “operation” (which can apply to a project, group of projects or a programme).

<https://ec.europa.eu/sfc/en/system/files/ged/Annex%20D%20-%20Practical%20guidance%20on%20data%20collection%20and%20validation.pdf>

A participant should be counted only once in any given operation. An individual may be counted as a participant in more than one operation but never more than once per operation (for output indicators).

An individual that benefits from support provided by more than one project within an operation is always considered as the same participant with one associated participation record. The start date is the date on which s/he starts on the first project in a series and the leaving date is the date that s/he leaves the last project in the series.

If a participant leaves an operation but returns at a later date there is still only one participation record. In this case, the existing participation record should be updated. The start date and information related to output indicators should always refer to the first participation and should therefore not be changed. On a second participation, the leaving date and data related to result indicators should be updated to reflect the situation on final

exit. Revisions of individual participation records will have to be propagated up to the relevant aggregate result indicators.

Further Note on Completeness of Records and Sensitive Data

Please note that only certain indicators may be left incomplete on your participant records.

In order for a participant to be counted in your monitoring data, information must be complete for all “non-sensitive” personal variables: gender, employment status, age, level of education and household situation.

Annex I of the ESF Regulation (Regulation (EU) No 1304/2013) sets out the indicators that are deemed to be “sensitive” (marked with “**”): those related to migrants, participants with a foreign background, minorities, participants with disabilities, and other disadvantaged. For these variables, if the participant refuses to provide the information then it can be left empty and the record still included in monitoring data, but you should maintain documentary evidence that you have attempted to collect the information (see section 5.6 in Annex D of the EC Guidance document – second link above).

Note, however, that there is still an important distinction to be made between monitoring (collecting and storing of participant data) and eligibility for support. **Incomplete data does not exclude participants from support.** Whereas the Regulations set out a legal requirement for complete data for monitoring purposes, this is not a criterion for eligibility. A participant who fulfils the eligibility criteria for an operation but is not prepared to reveal a complete set of data should not be recorded and reported as a participant in monitoring data, but can still be supported **so long as their fulfilment of the eligibility criteria** (e.g. age and/ or a certain employment status) **can be adequately documented.**