Building Better Opportunities

Guide to delivering European funding

Section six: Participants

About the Guide

This is just one section in a series of fifteen guidance documents that make up the Guide to delivering European funding (the '**Guide**'). Taken as a whole, this provides all of the guidelines, tools and templates needed to manage and monitor your project.

The version of the Guide replaces any and all guidance we have previously published in relation to this funding.

For the full contents visit our website here

How to contact us

✓ If you are a **lead organisation** involved in delivering a project, the best way to get in touch is through **your funding officer**.

✓ **Other organisations** should email us at esf@biglotteryfund.org.uk

We have a Building Better Opportunities support team in place who can help with understanding European Funding requirements. You should by now have a named contact to contact directly. If you are unsure who this is, please contact your funding officer.

Summary of changes

June 2017 – The link to Migration Watch UK in part 6.3 was removed, as being redundant. Part 6.5 contains clarification as to whether the content of the "needs assessment" means it can be taken as the start date for use in Annex H.

May 2017 – Lottery logo updated; addition of specific questions that should be answered concerning cross cutting themes and evaluation progress updates in "What have you learned ?".

March 2017 – Delayed quarterly update, including updated logo, clarification of "no recourse to public funds" eligibility in part6.5, four week rule and participants achieving more than one result / returning to project both clarified in part 6.10, eligibility of young people clarified in part 6.3, pointer to section 14:FAQs for further detail on eligibility and time constraints on refugees and asylum seekers.

September 2016 – Quarterly update, with use of National Insurance number for participant ID, updated Annex K, new Annex Q and revised annexes in Oct/Nov.

June 2016 - This version of the Guide incorporates appropriate comments gained from the consultation review in April 2016.

Any changes to the Guide will be:-

communicated on our website and on the inside page of each section.

emailed to current grant holders and highlighted in our programme e-bulletin.

Contents

Section six: Participants

Annex G – Participant file template

6.1 Who is a participant?

We call anyone who will directly benefit from the project a 'participant'. Each participant must be eligible to receive support and you will need to report a range of personal information about that participant.

Someone is eligible to receive support if:

- ✔ they are within the scope of the project outline you are delivering
- ✔ they are legally resident in the UK and able to take paid employment in European Union member states, and
- ✔ they are unemployed or economically inactive.
- ✔ However, for the participant to 'count' you will need to:
- ✔ collect a set of standard information about the participant, using the forms and templates provided in the annexes to this Guide
- ✔ maintain a comprehensive and accurate record of the individual's journey through the project, using a participant file
- ✔ retain evidence of the participant's eligibility, progress and results, and
- ✔ collate this information using the participant monitoring spreadsheet (Annex L).

Grant money can only be spent on an individual if **all** of the eligibility criteria apply and this information is collected, checked and retained. A participant can be counted only once within a LEP area.

Note that lead organisations must retain all documentation associated with the project, including participant data, until at least 31 December 2026, or until we say otherwise. This is because projects may be audited at any point up to this date.

For further details on participant eligibility see: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/602415/ESF_national_eligibility_rules.pdf

6.2 What is participant information?

The European Commission sets the framework for the types of participant information that must be recorded by projects. This will involve collecting a set of **outputs** and **results**.

Several of the outputs and all of the results link directly to the targets your project must achieve throughout its lifetime (see **Section five: Targets and project outcomes**).

➢ **What are outputs?**

Outputs include things like employment status, age, education and household situation. Outputs are only recorded once, even if the participant's situation changes during the time they are engaged on the project.

For example, the age of the participant is always calculated on the date they first joined the project. So a participant who is under 25 when they join the project, but over 25 on leaving it, would be recorded as below 25 years of age for as long as they remain on the project (including if they leave and later return).

➤ **What are results?**

Results aim to identify a change in the situation of the participant compared to when they joined the project and as a direct result of participating in the project.. They include things like moving into employment and engaging in job searching.

A participant may achieve more than one result (for example, on project Cor/2/1 a participant may gain basic skills on leaving (R3) as well as moving into employment) but an individual result can only ever be achieved once.

Results must be collected within four weeks of the date that a participant leaves the project. This is always the last date that the participant took part in an activity.

6.3 Types of participant

For the project outline you are delivering, we've identified particular target groups that should benefit from some, most or even all of your activities.

Your project outline distinguishes particular targets groups that are considered a priority by the European Commission, including:

✔ people with parental or carer responsibilities

✔ women

✔ people with health issues and disabilities

✔ Black, Asian and Minority Ethnic groups (BAME)

✔ refugees and recent migrants

✔ people aged over 50 with few or no qualifications and not in employment

✔ low income, single-earner households with children where at least one partner is not working

✔ those out of contact with the labour market

✔ offenders and ex-offenders

✔ homeless people

✔ people with low or no skills.

You can find out more about the definitions for most of these groups later in this Guide (see **6.15**).

The local ESIF sub-committee for your area may have identified other groups of people based on local priorities. The definitions for the main groups are included here.

➤ **Carers**

Carers are people who care for a family member or another person in need of assistance or support with daily living. Carers do not need to be related to the person they care for and every caring situation is unique. Carers can be adults caring for other adults, parents or adults caring for children who are ill or have a disability, or young carers aged under 18 years caring for, or involved in the care of, a parent, sibling, relative or friend.

➤ **Care leavers**

This covers any adult who spent time in care as a child (i.e. under the age of 18). It can range from as little as a few months to as long as one's whole childhood. This could be in foster care, residential care or other arrangements outside of the immediate or extended family. The care could have been provided by the state, through children's homes, or by the voluntary or private sector.

➢ **People with multiple and complex needs**

These are individuals who are experiencing at least two of the following: mental ill-health; substance or alcohol misuse; homelessness; and offending or re-offending behaviour. But there are broader definitions that can include other needs within that, such as: domestic abuse; disability; long-term health issues; financial difficulties and isolation.

➢ **People experiencing mental ill-health**

Mental ill-health refers to a wide range of conditions and disorders that can affect someone's mood, thinking or behaviour. Examples of mental ill-health include depression, anxiety disorders, bi-polar, schizophrenia, eating disorders, self-harm and addictive behaviours. There is generally a stigma attached to mental ill-health which may mean people feel uncomfortable talking about it.

➢ **People who are offenders or ex-offenders**

We can fund activities working with offenders or ex-offenders providing they are not in custody. Any project working with these groups in the community will need to work closely with the National Offender Management Services (NOMS) and other relevant local stakeholders to ensure that activities are additional and do not cut across existing provision.

➢ **Young people**

We can fund activities working with young people between the ages of 15 and 18. However there is a new statutory requirement for this age group to remain in education, employment or training. We can therefore only pay for activities working with young people who are aged 16-29 who are not in education, employment or training (NEET) and young people aged 15-18 who are NEET or at risk of becoming NEET. Young people below the age of 15 who do not fall into this category are ineligible.

As evidence of a individual being at risk of becoming NEET we would expect a referral letter from school and preferably an additional

confirmation letter from the local authority confirming that the individual is at risk of becoming NEET.

As evidence of an individual being NEET we would expect:

✓ DWP/Jobcentre Plus benefits decision notification letter – new claims award / decision or change of circumstances decision letter
✓ Written confirmation / referral from DWP/Jobcentre Plus or a referral from Careers Service or similar
✓ Where an individual is not engaged with DWP/Jobcentre Plus: written confirmation from a relevant third party that has been assisting the individual and so has an understanding of their current circumstances (such as NGO, charity, voluntary organisation). As an alternative to written confirmation, copies of original case notes and support records are acceptable.

➢ **Troubled families**

This can cover a broad range of circumstances but normally includes households that:

✓ are involved in crime and anti-social behaviour, where at least one person has a proven offence or an anti-social behaviour order against them

✓ have children absent from school, either due to exclusion, truancy or because a young person is placed in a alternative provision

✓ have adults who are in receipt of enemployment benefits

✓ are experiencing problems relating to emotional and mental health, drug and alcohol misuse, domestic abuse and under-18 conceptions.

This is just a summary of some of the known risk factors involved in family intervention work. Households may be affected by one or more of the circumstances.

➢ **Refugees and asylum seekers**

As long as the refugee in question has been given leave to remain in the UK they are entitled to receive support from this programme.

However, it is the responsibility of the grant holder to check right to remain is long enough to complete provision. Grant holders should check that they understand the difference between refugees and asylum seekers in terms of eligibility. You can find out more around the definitions for refugees and asylum seekers on the government website and especially paragraph 4.8 onwards of the Eligibility Rules in the government document. See also Guide section 14 - Frequently Asked Questions for more information on "right to remain" time constraints for refugees and asylum seekers.

Geographic eligibility

Project outlines have been carefully developed to address needs in specific LEP areas. You should consider to how you will ensure that the project will benefit participants within the LEP area. However, participants should not be turned away on the basis of where they live as their eligiblity is based on where they access the provision and not their home address.

6.4 The participant file

You'll need to keep a separate participant file for each individual engaged on the project. A complete participant file is the only way to prove that someone benefiting from the project is eligible to receive support.

We will ask to see your participant files whenever we visit your project. We will also ask you to send us electronic copies of a sample of your participant files.

If a participant file is found to be incomplete, inaccurate or inadequately evidenced, we may deem that participant to be ineligible. If this is the case for a proportion of your participants, we may determine that a similar proportion of your costs are ineligible too.

✓ **Organising the participant file**

The participant file **must** be split into four sections:

✓ Section A – Entry and eligibility.

✓ Section B – Progress.

✓ Section C – Expenses, incentives and allowances.

✓ Section D – Exit and results.

In **Annex G, w**e've provided a template to help with the layout of your participant files. This has a front page (with a field for adding the name and National Insurance number of the participant to provide a unique identity reference), a simple layout of contents and a divider for each section.

You can store your participant files electronically but remember that you'll need the participant to sign hard copies of several forms and you must keep them secure.

Each participant file must contain:	
Section A – Entry and eligibility	✓ A **participant entry form**, signed and dated by the participant and a project officer. ✓ Evidence that the participant has the right to work in the UK. ✓ Evidence that the participant is unemployed or economically inactive.
Section B – Progress	✓ A **participant progress form**, signed and dated by the participant and a project officer. ✓ Evidence that needs analysis, development planning or progress reviews have taken place.

	✓ Evidence of the participant's progression through the project, such as signed attendance sheets, course notes and submitted work.
Section C – Expenses, incentives and allowances	✓ A **participant expenses, incentives and allowances form**. ✓ Details and dated receipts for any expenses, incentives or allowances (see **Section eight: Costs and expenditure).**
Section D – Exit and results	✓ A **participant exit form**, signed and dated by the participant and a project officer. ✓ Evidence that the participant has achieved specific results, such as a letter from an employer or qualification certificates.

6.5 Entry and eligibility

The participant entry form must be completed before the individual can start on the project.

By 'start', we mean the learning or support that has actually begun, not any induction, gathering evidence of eligibility or other enrolment activities that have been carried out. Typically, this will result in two different dates:

✓ the date the participant first enrolls with the project and completes the entry form **- this is not start date**.

✓ the date the participant takes part in their first activity or intervention on the project (their official **start date** for the

purpose of reporting to us and ESF reporting). When we check the participant file we expect to see evidence of this date.

Before deciding whether to support a participant, it is good practice to undertake an early assessment of their circumstances. This will determine if:

✓ the project will be suitable and effective in addressing their needs

✓ there are particular barriers or challenges they face.

As part of this initial conversation, you must complete the **participant entry form** (**Annex H**) as it will help you determine whether or not they are eligible. You must do this before the participant can start on the project. Note that if an evidence document contains the phrase "no recourse to public funds", this person can become a participant since Lottery funding is not counted as public funds.

If this needs assessment goes beyond simple induction (eligibility check, enrolment / gathering evidence, outlining project content,) and leads to significant engagement that identifies required support via an agreed action plan for participant development, then it can be taken as the first activity and thus the participant start date to be used in **Annex H.** A meaningful needs assessment would contain evidence of, for example:

- the participant reflecting on their situation, aims, and barriers to achievement
- early decisions made about the participants involvement on the programme
- SMART objectives and intermediate goals to set the participant's direction of development
- significant engagement between the participant and project worker after eligibility to the project has been demonstrated

Annex H collects contact information for the participant and gathers all the outputs you will need to report to us. Participants **must** sign a hard copy of this form as their signature confirms that:

- ✓ their personal information can be stored and used by us and others to monitor and evaluate the project
- ✓ they understand the project is part-funded by money from the European Social Fund.

What the participant entry form collects:	
1. Summary	This is completed by project staff once the participant's eligibility has been confirmed.
2. Details	Asks for contact information and the gender and date of birth of the participant.
3. Ethnicity	Asks for the ethnic background of the participant.
4. Eligiblity	Asks for an item of evidence from the list of acceptable documents to prove their right to live and work in the UK.
5. Employment status	Asks whether the participant is unemployed or economically inactive and requests an item of evidence to prove this.
6. Education	Asks for the highest level of education or qualification the participant currently holds, and also asks for details on the basic skills of the participant.
7. Household situation	Asks whether the participant is homeless or living with other adults who are unemployed and whether they have dependent children in the household.

8. Other information	Asks for the participant's sexual orientation and whether they have a disability or a work limiting health condition.
9. Participant declaration	Asks for a signed declaration from the participant.
10. Project declaration	A signed declaration from a project officer.

6.6 Right to work in the UK

If right to work in the UK cannot be verified, the participant must not receive support through the project.

Someone can live in the UK without necessarily being able to work here. However, people who have a right to work in the UK will always have the right to live here.

For most participants, it will be clear that they can work in the UK because they will have a permanent National Insurance number or a passport showing that they are a citizen of a European Economic Area country.

➢ **European Economic Area (EEA)**
At the time of this Guide's publication, the EEA includes all EU states plus Iceland, Liechtenstein and Norway. Although Switzerland is not a member of the EU or EEA, they are able to take part in the EU's single market. A full list can be found at **https://www.gov.uk/eu-eea**

➢ **Paying for identity documents**
As you'll be engaging with the most disadvantaged, it is reasonable to assume that some participants will be unable to provide an acceptable form of evidence at the point in which they enrol on the project.

Lack of an identity document can be a major barrier to employment, so we will pay a reasonable amount for this as a participant expense (see **Section eight: Costs and expenditure**).). See this link for documents used as acceptable proof of identity: https://www.gov.uk/government/publications/proof-of-identity-checklist/proof-of-identity-checklist

If you proceed with engaging the participant in activities prior to their right to work being confirmed, this will be at your own risk as associated costs will be ineligible and outputs and results cannot be counted until eligibility has been established.

Evidencing right to work

To be eligible for support from the ESF an individual must be:
• legally resident in the UK
• able to take paid employment in a European Union member state

You'll use the **participant entry form** to declare that you have checked, copied and retained such documentation. You will need to provide a National Insurance number for each participant to provide a unique identifier.

The participant **must** be able to provide **one** item of evidence from the list below:

✓ A passport showing the holder, or a person named in the passport as the child of the holder, is a British citizen or a citizen of the UK and Colonies having the right of abode in the UK.

✓ A passport or national identity card showing the holder, or a person named in the passport as the child of the holder, is a national of a European Economic Area country or Switzerland.

✓ A Registration Certificate or Document Certifying Permanent Residence issued by the Home Office to a national of a European Economic Area country or Switzerland.

✓ A Permanent Residence Card issued by the Home Office to the family member of a national of a European Economic Area country or Switzerland.

✓ A **current** Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder indicating that the person named is allowed to stay indefinitely in the UK, or has no time limit on their stay in the UK.

✓ A **current** passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK.

✓ A **current** Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK, **together with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.

✓ A **full** birth or adoption certificate issued in the UK which includes the name(s) of at least one of the holder's parents or adoptive parents, **together with** an official document giving the person's permanent National Insurance number.

✓ A birth or adoption certificate issued in the Channel islands, the Isle of Man or Ireland, **together with** an official document giving the person's permanent national Insurance number and their name issued by a Government agency or a previous employer.

✓ A certificate of registration or naturalisation as a British citizen, **together with** an official document giving the person's permanent national Insurance number and their name issued by a Government agency or a previous employer.

You **must** see an original and retain a photocopy. This must be signed and dated by the project officer, plus a stamp or written wording to certify this as a true copy of the original and kept securely in the

individual's participant file. A sample of the copies should be periodically checked and logged as being verified by an appropriate member of staff, such as the legally responsible contact, to ensure that programme policy and procedures have been met.

6.7 Unemployed or economically inactive

The participant must be unemployed or economically inactive. This means someone with part-time work or a zero hours contract is ineligible even if they are receiving Jobseeker's Allowance.

➢ **People who are unemployed**
    If someone is unemployed then they are entirely without work, but are available for work and actively seeking work. They will usually be registered unemployed and be in receipt of unemployment benefits.

A participant may also be **long-term unemployed**. This is where they are:

✓ **youth long-term unemployed** – aged under 25 and out of work for a continuous period of more than six months **or**

✓ **adult long-term unemployed** – aged 25 or over and out of work for a continuous period of at least 12 months.

➢ **People who may be economically inactive**
If someone is economically inactive then they are not in paid employment or self-employment and are not available for or not seeking work.

They may be in receipt of certain benefits (such as Incapacity Benefit or Employment and Support Allowance) and could also be in training or education of some kind. A participant may be classed as economically inactive if they are:

✓ a full-time student, even if they are registered as unemployed

✓ retired, disabled or a full-time carer (all subject to individual circumstances)

✓ receiving Employment Support Allowance (ESA), Incapacity Benefit (IB) or Income Support (IS) and not working

✓ not in receipt of benefits

✓ a Universal Credit claimant who is placed in the Work Preparation Requirement or Work Focused Interview Requirement conditionality groups

✓ on full-time parental leave (understood as absences from work to bring up a child of young age for a period which does not fall under the classification or maternity or paternity leave), unless they are already registered as unemployed

✓ distant from the labour market and need additional support, skills and confidence to enable them to move towards employment.

➢ **People in employment**
We consider anyone who is in paid employment to be ineligible, even if employed for just one hour per week. This includes people that:

✓ are aged 15 and over and have performed work for pay or profit, including subsidised or incentivised employment

✓ have a part-time job or a zero hours contract even if they in receipt of unemployment benefits, such as Jobseeker's Allowance

✓ are in work but on maternity or paternity leave, even if this is unpaid

✓ are self-employed, including those helping family members

✓ are in the process of setting up a business, farm or professional practice

✓ have a job or business from which they are temporarily absent because of illness, holidays, industrial dispute, or education and training.

Evidencing employment status

We appreciate that obtaining the preferred forms of evidence may be difficult when working with the groups targeted by this programme and changes to the benefits system also cause complications. The following sets out a hierarchy of preferred evidence to prove eligibility in descending order
1. Obtain documents from the preferred evidence list below
2. A referral / introduction / written confirmation from a relevant third party
3. Alternative documents if considered to be credible and persuasive by the beneficiary organisation / delivery partner;
4. Make a risk-based exception if no evidence can be provided and if suitably justified (self-declaration)

The onus for checking the eligibility of participants lies with your project and delivery partners.

Preferred evidence list:
Projects should always request 'preferred evidence' in the first instance, self-declarations must never be used ahead of preferred evidence because it is easier and quicker to take this approach.

Participants who are registered unemployed:

✓ A letter or document from the Department for Work and Pensions that confirms the individual is registered unemployed.

Participants who are unemployed but not registered:

✓ A letter or document from a government agency, such as the Careers Service, that gives their status as unemployed.

Participants who are economically inactive:

✓ A letter or document to support this, such as a doctors letter, letter of entitlement to state pension or correspondence from an educational establishment if you are a full time student.

Some documents that are used for ESF evidence are never out of date (for example qualification certificates) but information related to a participant's current circumstances need to be supported by recent evidence. The following guidelines can be applied

✓ Recent payslip = issued in last 3 months.
✓ Documents produced annually (tax related, tax credits) = latest issued (should therefore be no older than 12 months).
✓ Award letters (grants, benefits, student loans) – original letter acceptable unless recurring award letters are issued (e.g. annual tax credits notification).
✓ Other correspondence (non-recurring in nature) = no longer than 12 months old.
✓ Introductions / referrals from relevant third party = within last 3 months

Referrals and introductions
A written referral must be provided from the referrer and be signed and dated, it will need to contain:

1. The name of the participant
2. Name of the ESF project
3. Eligibility criteria being confirmed i.e inactive, unemployed, full time student

Documents from DWP/Job Centre Plus, National Careers service and Local Authorities can be taken in good faith. With other organisations you will need to consider what puts them in a position to confirm the criteria and make a note of it on the entry form Annex H. The onus for checking the eligibility of participants lies with your project and delivery partners.

Other credible documents
If no preferred evidence or a referral from a third party already engaged with the participant and familiar with their circumstances is available you can consider alternative evidence. You will need to explain on the entry form:

- ✓ Reasons why the participant does not have the preferred evidence or referral
- ✓ What efforts have been made to try and obtain the preferred evidence
- ✓ What evidence has been provided and why it has been accepted

Risk based exception (self-declaration)

Where satisfied that, despite the absence of any evidence, the participant qualifies for support, document the justification for proceeding, to include:

- ✓ Reasons why participant does not have any preferred or alternative evidence available.
- ✓ Document how the beneficiary / delivery partner has attempted to collect the required evidence.
- ✓ Explain how / why satisfied that the reasons provided by participant are credible / plausible.

Some projects have found it useful to create a form specifically for self-declaration, a copy of this must be retained on the participant file.

If there is no case to justify an exception then the individual will not qualify for ESF support.

Evidence retention

In all cases, you **must** see an original and retain a photocopy of any evidence provided. This must be signed and dated by an appropriate member of the project staff, such as the legally responsible contact, as a true copy of the original and kept securely in the individual's participant file.

6.8 Data protection

Over the course of the project, you'll collect, retain and report on a range of personal information, including copies of identity documents and sensitive data. These details must be stored securely and retained in compliance with the Data Protection Act 1998. This information will be used to evaluate this project and to report to the Big Lottery Fund and European Social fund for monitoring purposes. Participants may be contacted to discuss their involvement in the project. For the purposes of the Data protection Act 1998, the Department of Works and Pensions is the data controller in respect of information processed which relates to participation in the project funded by the European Social Fund, whilst the Big Lottery Fund is the data processor.

The Data Protection Act 1998 (DPA) regulates the processing of personal data to protect the rights of the individuals whose data is held. Some principles from the Act that you should be aware of:

- ✓ Be clear from the outset about why you are collecting personal data and what you intend to do with it. If you do not intend to make use of the data then you should not ask for it.
- ✓ Be transparent about how you intend to use the data and give individuals appropriate notice.
- ✓ Handle personal data only in ways people would reasonably expect and do not permit data processing that may cause unjustified adverse effects on the individuals concerned.
- ✓ Make sure you do not do anything unlawful with the data and do not keep information for any longer than necessary. Destroy personal data securely once there is no longer a reason to retain it.
- ✓ Take reasonable steps to ensure the accuracy of any personal data you obtain and make sure your methods are robust and relevant.

- ✓ Be aware of the participant's rights to: access a copy of their personal data; prevent processing for direct marketing; have incorrect data rectified, blocked, erased or destroyed; obtain compensation for damages caused by breaches of the Act.
- ✓ Keep data secure against unlawful or unauthorised processing or accidental loss.

For further information and assistance on your obligations under the Data Protection Act 1998, please consult the Information Commissioner's Office at https://ico.org.uk

Data sensitivity

In principle, everything on the **participant entry form** must be collected in order for an individual to be eligible. However, individuals retain the right to refuse consent for certain sensitive data to be collected. This covers:

- ✓ disability or work-limiting health conditions
- ✓ gender
- ✓ sexual orientation
- ✓ ethnicity
- ✓ if they are an offender or ex-offender
- ✓ homelessness
- ✓ records relating to other people, for example: children, dependents, caring responsibilities and whether the participant lives in a jobless household.

An individual can refuse consent using the 'prefer not to say' options on the **participant entry form**. This confirms that there has been an attempt to collect the information from them.

You should of course remain alert to the possibility that false information is being provided in order to access support. Suspected fraud must be properly investigated and participants must not be allowed to start activity on the project unless you are satisfied that they are eligible.

Data security

To keep your data secure, you will need to think about the premises, staff, filing system and computer systems that will be used across your partnership and the risk of harm that could result from any security breach. For example:

1. You may need to update your policies and procedures, and conduct staff training, to manage the risks associated with handling personal data, and be ready to respond to any breach of security swiftly and effectively. Note, however, that staff training is an ineligible cost that cannot be paid from the grant.
2. You will need to take account of the number of staff involved in the project and the extent to which they can access this data. Only authorised people should be able to access, alter, disclose or destroy personal data.
3. You will need to make sure you have the right physical and technical security across the various premises and paper filing systems or computer systems being used.
4. You will need to ensure that any personal data held or used by a third party (such as a web-based cloud service) is secured appropriately, bearing in mind current legislation.

We'll establish a secure file transfer so lead organisations can send participant information to us. **Under no circumstances should this information be sent to us by email.**

Project partners will need a similar route for sending sensitive information to the lead organisation, which avoids the use of email. It is the responsibility of lead organisations to establish such a service for their partners to use.

You should back-up your records regularly to help mitigate the risk of loss or destruction of key evidence.

6.9 Evidencing progress

Whilst the participant is engaged on the project, you must keep an up-to-date record of their attendance and development. You'll use the participant progress form, together with other types of evidence, to do this.

Evidence of progress is an essential part of the participant file. This will provide a detailed picture of the activities and services that have been engaged in and how they meet the expectations and needs of the participants you are working with.

You need to keep a record of:

✓ when and for what purpose an individual is accessing the project

✓ how the activities are helping to address their development needs

✓ the activities or work that has been completed.

Documenting attendance

The **participant progress form** (**Annex I**) must be used to document an individual's attendance on the project. Both the participant and a member of project staff need to sign the form each time that an activity has been undertaken. The description of each activity needs to be clear enough for us to understand what activity took place.

Documenting development

You'll need to work with the participant to identify their development needs and goals. This should be presented in the form of an 'action and development plan'. You need to periodically update this to reflect the training and support planned and completed.

Although we've provided a template for this in the **participant progress form**, we're aware that many organisations will already do this as a matter of course. It is acceptable to use your own template

for this – but it must have the logo (see **Section nine: Publicity)** and collect the participant's ID number and signature.

Documenting activity

You need to retain things like attendance sheets, course notes, submitted work and other relevant information to show that the participant is progressing through the project and that this is in line with their personal action and development plan. You should also keep on record any needs analysis, development planning or progress reviews that have been completed.

6.10 Exit and results

The participant exit form must be completed when an individual leaves the project.

By 'leave', we mean the point at which the participant has finished their last activity on the project. For example, they've reached the end of their training and have no further activities planned with the project.

The **participant exit form (Annex J), (or Annex P for London projects or Annex R for Cor/2/1**) documents the results that the individual has achieved which will count towards your project targets (see **Section five: Targets and project outcomes**).

Depending on their circumstances at the start of the project, participants achieve a result if:

• unemployed participants move into employment, including self-employment, on leaving (R1)

• inactive participants move into employment, **or** job search on leaving (please note a result is only counted once for either moving into employment or moving into job search, whichever is the status on leaving the project) (R2)

- participants move into education or training on leaving (participants can previously have been unemployed or inactive) (CR02)

- gain basic skills by the time of leaving the project, in literacy, ESOL or numeracy (**COR 2/1 only**) (R3)

- are in sustained employment for 26 out of 32 weeks after entering employment or self-employment (**Projects based in London only**).

A participant may achieve more than one result but a result can only ever be achieved once and it must be recorded within **four weeks** of the date that a participant leaves the project. However, in order for you to 'count' a result against your targets, you must have retained evidence to prove that the result has actually been achieved. The collection of this support evidence can exceed the four week window as long as the result is recorded within the four week window.

Results are always measured from the starting status of the participant to the time they exit the project. Within the LEP area each participant must have only one record, if the participant moves between projects or leaves and re-enters a project the start date and status remains the same as when the participant joined their first BBO funded project and results from participation in previous projects should be deleted and removed from the results count.

To avoid confusion with regards to R2, 'Inactive participants into job search or employment' is worked out based on the change in labour market position of the participant and only the status when the participant leaves the project will be counted. If the participant's employment status has moved from inactive to unemployed then a job search result can be counted; if the participant has moved from inactive to employed then an employment result can be counted. Annex L will automatically calculate these results.

Projects based in London
You must use the participant exit form included in **Annex P** (see **Section twelve: Projects based in London**). This form has extra

specific questions about the participant's satisfaction, as this is required for the Employability Performance Rating tool.

Evidencing results

You'll use the **participant exit form** to declare that you have checked, copied and retained documentation to prove that the participant has achieved a result. The form of evidence required depends on the result.

The participant must provide **one** item of evidence from the list below. You **must** see an original and retain a photocopy. This must be signed by a project officer as a true copy and kept in the individual's participant file.

Participants who move into education or training

✓ A letter or document from the school, college, university or learning provider demonstrating that the participant has formally registered and started the education or training.

Note that the start of education or training must be within four weeks of the leaving date of the participant.

Participants who move into employment

✓ A letter or document from the employer confirming that the participant has started their new job.

✓ A payslip.

✓ A signed contract of employment.

Note that the date of starting employment must be within four weeks of the leaving date of the participant.

Participants who move into self-employment

✓ A letter or document showing that the business activity is registered with HMRC for tax, VAT or National Insurance purposes.

- ✓ A record showing that the business activity is active and operating, such as a bank statement or a lease/purchase agreement on equipment and premises.
- ✓ If registered with Companies House, a record listing the participant as a company director.

Note that the date of starting self-employment must be within four weeks of the leaving date of the participant.

Inactive participants who move into job-search

- ✓ A declaration from the participant that they are engaged in job searching with a description of what steps they have taken to search for a job, together with evidence of job-search such as:
- ✓ a CV and a list of jobs applied for
- ✓ a letter or document from the Department for Work and Pensions that confirms the individual is registered unemployed
- ✓ a letter or document from a government agency showing the person has newly engaged with mainstream support and is working with them to apply for jobs
- ✓ a bank statement showing benefit payments.

Note that the date of any documentation must be within four weeks of the leaving date of the participant.

Participants who are disadvantaged and achieve a result

Whether someone is disadvantaged is determined from their status at the start of the project and does not need to be evidenced again at the end of their activity with the project. However, documentation must still be retained for the results they achieve.

Participants who gain basic skills, such as literacy or numeracy (Cor/2/1 only)

- ✓ A qualification certificate or letter from an awarding body issued to the individual.

Note that the date of any qualification must be within four weeks of the leaving date of the participant.

Participants who are in sustained employment

- ✓ Details of the attempts made to contact the participant and records from any phone conversations, surveys and meetings conducted.

6.11 Closing the participant file

Once the participant has completed their final activity on the project, you must ensure their file presents a complete and accurate picture of their journey through the project.

If we find that a participant file is incomplete, we may recover the money that has been spent on that individual. If this is the case for a proportion of your participants then we may determine that a similar proportion of your costs are ineligible too.

After a participant leaves the project, it may become difficult to request information from them. For this reason, ensure that you have the evidence to prove eligibility, progression and results **before** the participant has completed their last activity on the project.

You must retain the closed participant file until the end of your project monitoring period and closure of your project.

➢ **Example participant file (Annex K)**
An example of a participant file is available on the website. This will help you understand how the various forms and templates link together. It also shows what is needed to form a complete a participant file.

6.12 Collating participant information

You'll use the information from the participant entry and exit forms to maintain the **participant monitoring spreadsheet (Annex L)**.

Each partner is required to complete and maintain its own spreadsheet **for each quarterly period (see Section four: Payments and monitoring)**.

Partners will send this to the lead organisation, who will in turn aggregate this information into a full report. They will send the full report to us each quarter.

This spreadsheet:

- ✔ records key project information, including the delivery organisation and claim period
- ✔ uses the National Insurance number as a unique personal identifer for each participant
- ✔ collects contact information that can be used to trace and contact a participant
- ✔ gathers sensitive personal information, such as date of birth, gender and ethnicity
- ✔ collates all of the outputs for the participant at the point at which they first join the project
- ✔ reports any results they have achieved when they leave the project.

We will ask to see these spreadsheets throughout the delivery of the project, not just at the end of each quarter, to ensure local reporting systems are being appropriately managed.

The information collected on the entry and exit forms must correlate with what is being reported, so every effort must be made to maintain and review this spreadsheet to ensure both its accuracy and completeness. Responsibility for this lies with the lead organisation as the body reporting directly to us.

Data quality

Data quality is an important part in demonstrating a participant's eligibility. There is a risk that project staff may not apply the same standards or definitions, or that they are not communicated effectively to partners.

You must put in place procedures that your partnership will use to explain how you will ensure:

- ✔ data is collected across different organisations and sites
- ✔ the definitions included in this Guide are used consistently
- ✔ data is certified by participants
- ✔ data is checked and verified to ensure consistency across participant paperwork
- ✔ discrepancies between data and paperwork are identified, reconciled and submitted
- ✔ planned and actual attendance and progress is tracked and monitored
- ✔ participants moving between partners will be handled
- ✔ incomplete records are identified and corrected
- ✔ project staff from across the partnership are trained to ensure a consistent approach.

6.13 Participants already receiving support

A situation may arise where a participant receives support from more than one Building Better Opportunities project, either simultaneously or consecutively. This can affect the targets your project can achieve.

The European Commission is very specific about how the projects we fund will add value, so they do not duplicate provision that can be arranged locally through new and existing support services, institutions and statutory bodies.

They consider all the Building Better Opportunities projects awarded funding in the same Local Enterprise Area (LEP) an 'operation'.

In practical terms, this means that the same person cannot be counted more than once in the same LEP area.

This does not affect the individual's eligibility for support through your project, including any costs incurred, however it may affect your output and result targets.

- ✓ If the participant has been engaged on a project in a **different LEP area**, or a project is not funded by Building Better Opportunities, there is no complication.
- ✓ If the participant has been engaged on another project funded by Building Better Opportunities in the **same LEP area,** then there are implications around what can be 'counted'.

Participants in the same LEP area

The most likely occurrence will be a participant leaving one project funded by us (the first provider) to later join another (the second provider).

Where the participant is engaged in projects simultaneously, the first provider is whoever the individual engaged with first.In these cases, we will take the following approach:

In these cases, you must take the following approach:

- ✓ the first provider can count the participant against its **output targets**
- ✓ the second provider can claim any **new** results achieved.

However, the European Commission has advised that any old results achieved by the first provider must not be claimed. A note will need to be added to the participant record to show that this is the case and you will also need to update us with this information so that we can delete these results from what we report the Managing Authority and the European Commission.

We've been unable to negotiate a change in this position and recognise that this will be disappointing to those projects it will affect.

➢ **Paying for participants affected**

We recognise this could be seen by the second provider as less of a motivation to work with these participants, particularly if they then do not achieve any new results.

But we want to encourage providers to continue to support people with longer term entrenched needs, which may require a greater degree or different kind of support than the first provider may have been able to give. For this reason, **we will still pay for the costs incurred** in delivering support to this participant, even if the second provider doesn't achieve a new result. However, we will not pay for costs of identity documents as these should have been secured by the first project.

➢ **Identifying these participants**

In practical terms, this means all projects funded by us in the same LEP area need to talk regularly and have a system in place to identify any participants joining more than one project.

It will not always be immediately evident whether a participant has been involved with another project in the area.

As a first point of call, you'll need to ask participants entering the project whether they've been involved in other provision in the area and if they're aware if this was part of the same programme. We've included a question on this in the participant entry form.

You will need to check that you do not submit duplicate records in Annex L.

➢ **Reporting these participants**

We'll need you to use the National Insurance number (plus any local reference number if there is one) from the previous provider. You will also need to use this number throughout the documents in the participant file.

6.14 Category of region

The European Commission has split England geographically into different 'categories of region'. You are required to report the category of region for each participant.

Most projects will cover only **one** category of region, either:

- ✓ less developed, **or**
- ✓ transitional, **or**
- ✓ more developed.

In these situations, the category of region will be the same across every participant engaged on the project.

However, some projects will cover **two categories of region**.

We will make sure lead organisations are aware of the category of region they are operating in and whether they are working across more than one region.

Determining category of region

The category of region is determined from the postcode of the project's **main delivery location**, **not** the participants' home address.

- ✓ If your project covers only one category of region, this will be the postcode of your main location.

- ✓ If your project covers two categories of region, you must have a delivery location in each region.

Lead organisations must make it clear to all delivery organisations which category or categories of region they are operating in.

You will need to ensure that each region has the appropriate share of spend and participants, so this can be demonstrated to auditors. Your funding officer will tell you what this share must be.

6.15 Participant definitions

We have provided a detailed list of all the data fields required for the **participant monitoring spreadsheet** in **Annex** M. This also include the various definitions you will need to bear in mind as you are collecting information from participants and then reporting this information to us.