

# FAQ on data collection and data validation, ESF 2014-2020 – February 2016

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## ➤ Definitions

### ➤ Definitions of common and YEI indicators

**Q:** Where can the definitions for all common and YEI indicators be found?

**A:** The common output and result indicators for ESF investments and the result indicators for the YEI are listed in Annex I and Annex II respectively of the ESF Regulation (1304/2013). Definitions for these indicators are then given in Annexes C1 and C2 of the EC Guidance document on Monitoring and Evaluation.

**Q:** Is there a common definition of cooperative and social economy enterprise or can national definitions be used?

**A:** The definition of the indicator on “number of supported micro, small and medium-sized enterprises (including cooperative enterprises, enterprises of the social economy)” includes a general definition of an enterprise *“An enterprise is considered to be any entity engaged in an economic activity, irrespective of its legal form”*. The common indicator therefore covers all SMEs that benefit from direct support irrespective of their legal form and no breakdown is required. If a Member State wishes to establish a programme-specific indicator that distinguishes enterprises of particular legal forms, such as cooperatives, then a definition based on the relevant national legislation should be used.

### ➤ National definitions

**Q:** Can national definitions which differ from the definitions provided in the EC Guidance document on Monitoring and Evaluation be used for common indicators?

**A:** For common indicators, national definitions can only be used for the following four output indicators:

- migrants, participants with a foreign background, minorities (including marginalised communities such as the Roma),
- participants with disabilities,
- homeless or affected by housing exclusion,
- other disadvantaged.

For all other indicators, the definitions in Annex C1 of the EC Guidance document on Monitoring and Evaluation are to be applied.

**Q:** Can national definitions be applied for the common output indicator on rural areas?

**A:** No. The common definitions are in place in order to ensure consistency in the data provided by all Member States. The DEGURBA (DEGree of URBAinisation) classification should therefore be used for the indicator on participants “from rural areas”.

The monitoring system needs to collect information on the place of residence of the participant. This should then be matched with the LAU2 codes used in the DEGURBA dataset published by Eurostat to determine if the participant is living in a rural area.

The DEGURBA classification establishes three categories of area:

- (Code 1) Densely populated area (cities or large urban area)
- (Code 2) Intermediate density area (towns and suburbs or small urban area)
- (Code 3) Thinly populated area (rural areas).

The common output indicator “from rural areas” should record participants residing in areas classified in the Eurostat DEGURBA data as 3 –Thinly populated area.

You can find information about the DEGURBA classification at:

[http://ec.europa.eu/eurostat/ramon/miscellaneous/index.cfm?TargetUrl=DSP\\_DEGURBA](http://ec.europa.eu/eurostat/ramon/miscellaneous/index.cfm?TargetUrl=DSP_DEGURBA)

### ➤ **Defining operations**

**Q:** What is the definition of “operation”? Can operations be defined by the MA?

**A:** According to Article 2 (9) of the Common Provision Regulation (1303/2013), an operation is defined as *“a project, contract, action or group of projects selected by the managing authorities of the programmes concerned, or under their responsibility, that contributes to the objectives of a priority or priorities; in the context of financial instruments, an operation is constituted by the financial contributions from a programme to financial instruments and the subsequent financial support provided by those financial instruments”*.

In other words, an operation is a project, contract, action or group of projects whose objectives are determined by one or more specific operational programmes and which are financially supported by one or more operational programmes. Note that an operation may consist of a single project/activity, a group of projects/activities or even a part of a continuous project/activity.

In all cases, each participant should have a single participation record per operation and thus, should be counted only once per operation irrespective of the number of times that s/he leaves and then re-enters the same operation. Entry and exit date of participants (and entities if applicable) are determined at the level of operation. Thus, in each of the cases above the treatment of participation records might differ in case of exit and re-entry.

Note that it is also possible that a project continues after the end of the ESF operation. In this case although the participants do not leave the project, it has to be considered that they have left the operation on the date that it ends (see Example 7 in Annex D – Practical Guidance of the EC Guidance on Monitoring and Evaluation).

**Q:** What are the criteria for defining what comprises an operation?

**A:** Operations should be defined in a way that they contribute to the objectives of the operational programme and, in particular, to the specific objectives of the investment priority (IP) under which the operation is implemented. Indicator monitoring data should be in line with the specific objectives of the IP and should be able to capture the achievement of results. The target groups and the type of intervention/action should be taken into consideration for defining operations. If too many projects are combined in a single operation, it might be difficult to capture the changes in the participant’s situation as a result of support. If operations are designed so they consist in small projects/activities, implementation might become too complex and “results” might become irrelevant.

In addition, the administrative burden and the reporting complexity should also be considered. If the design of an action results in many small operations, the administrative burden of reporting will be substantially increased (see next section). On the other hand, one single operation comprising many projects will have to be reported only by one beneficiary. This might end up being too complex and difficult to break down for the audit trail.

## ➤ Participants

### ➤ Collecting and reporting data for participants

**Q:** Can participants be counted in monitoring data if their participation records are incomplete? What are the recommendations on how to proceed when participants refuse to provide personal sensitive data?

**A:** For monitoring purposes there is no flexibility as regards the completeness requirement. In order for a participant to be counted, information should be complete for all non-sensitive personal variables: gender, employment status, age, level of education and household situation.

The only variables that can be incomplete are those dealing with special categories of personal data (i.e. sensitive data) that are required for indicators marked with “\*\*\*” in Annex I of the ESF Regulation (Regulation (EU) No 1304/2013) (i.e. 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 but the managing authority should maintain documentary evidence that they have attempted to collect the information (see section 5.6 in Annex D of the EC Guidance document on Monitoring and Evaluation).

**Q:** How often should indicators for participants be collected and reported? Annually, when entering the project, or when leaving the project?

**A:** For output indicators, information about personal characteristics of participants (gender, age, level of education, household situation, and information about possible disadvantages such as disability) should be collected only once and should reflect the situation on the date that they enter an operation (i.e. on the first day that participants take part in ESF supported operation). At the same time, it is required to collect information about their current (i.e. when entering the operation) labour market status and, for those who are inactive, whether they are currently in education or training. This information may be collected at some point before the start date (e.g. on registration) but any variables which might change (e.g. employment situation, household situation) should be verified on the start date.

Subsequently, only changes regarding the labour market and the educational situation of the participants should be monitored (e.g. whether they found a job or started seeking for one, whether they have gained any qualifications as a result of the operation, and whether or not they are in education or training). For YEI supported operations it is also required to record whether the participants completed the intervention (planned activities) or not and whether they received an offer. This information has to be collected for each participant when leaving an operation (i.e. on the exit date or within 4 weeks of that point).

The above represents two sets of information to be collected for every participant – one when entering the operation and one when leaving. The numbers of participants in each situation are aggregated on an annual basis at the level of investment priority to produce the indicator values that should be reported in each AIR.

Additionally, for representative samples of participants, a further set of observations describing their labour market and educational situation six months after leaving has to be

collected and reported twice during the programming period (in the AIR 2018, to be submitted in 2019, and in the final report). This information is used to produce the common longer-term result indicators. For YEI supported operations only, YEI longer-term result indicators have to be reported annually, which requires annual sampling.

Where programme specific indicators are established, any additional data needed for these indicators is required on entering (output indicators) and on leaving the operation (immediate result indicators) or at a certain point in time after leaving the operation (longer-term result indicators).

**Q:** Should information that is not relevant to the operation/programme objectives be collected for all common (output and result) indicators (e.g. labour market situation of participants in operations targeting civil servants who by definition are employed)?

**A:** Yes. Reporting on the full set of common indicators listed in Annex I of the ESF Regulation (Regulation (EU) No 1304/2013) is required for all IPs supported by the ESF (see also section 3.1 of the EC Guidance document on Monitoring and Evaluation). The only exception relates to Technical Assistance priority axes.

However, not all data have to be collected by asking participants. Where possible, the use of already available administrative data is recommended so as to minimise administrative burden. For operations targeting particular groups for which it is clear and certain that all participants have specific characteristics (e.g. employed), participation records in the monitoring database can be completed without asking the participant (e.g. auto-filled fields). Any such treatment should be documented and justified.

Fields recording irrelevant data should be completed with “0” (see definitions in Annex C and the “reference population” for each of the result indicators in Annex B of the EC Guidance document on Monitoring and Evaluation). For example, the immediate result indicator dealing with participants engaged in job-searching on leaving refers only to participants who were inactive on joining. Data for this indicator do not need to be collected directly from participants who were employed or unemployed on joining and the fields recording these results can be completed with 0.

Note that it is not possible to report values for indicators as “not applicable”. Each participant must count either 1 or 0 towards each of the non-sensitive indicators (although for indicators on personal sensitive data, “non-response” values can be recorded).

Finally, in addition to the obligatory common indicators, Member States may also elaborate programme-specific (output and result) indicators which can facilitate more effective monitoring of the specific programme objectives. A separate guidance note dedicated to indicators for public administration capacity building is available.

**Q:** Should individuals benefitting from open services be counted as participants (e.g. events for general public such as fairs and information days, phone or e-services)?

**A:** According to the EC Guidance document on Monitoring and Evaluation (section 3.1): *“Only those persons who can be identified and asked for their personal data (i.e. gender,*

*employment status, age, educational attainment, household situation) and for whom specific expenditure is earmarked shall be reported as one participant.”*

The completeness requirement combined with the earmarked expenditure requirement means that persons participating in open-door events or benefitting from un-personalised e-services should not be counted as participants. Therefore, data collection should be limited to targeted support that is designed to directly benefit selected identifiable individuals (i.e. offered to a defined target group, excluding interventions for the general public and “open door” events).

Outputs and results for operations mainly consisting of this type of activities could be measured through the use of programme-specific indicators such as: number of events, number of hits on web-pages, registered users, feedback questionnaires, etc.

**Q:** Who should be counted as participants in operations providing training to teachers/counsellors so as to provide better services to students (e.g. trainings and meetings for teachers/counsellors to provide quality career counselling to students in schools)?

**A:** Participants need to be defined on the basis of the objective of the operation and how it is targeted. Output indicators should cover persons benefitting directly from the ESF support under the respective investment priority. Therefore, depending on the objective of the operation students or teachers/counsellors might be counted as participants, but this can only be ascertained on a case by case basis:

- Case 1: Operation provides training to career guidance counsellors in order to improve, expand (or create) career guidance services in schools. The service is then open to all students on demand. This is capacity building, individual students are not targeted.
  - Counsellors should be counted, students should not.
- Case 2: Operation aims to improve school-to-work transition of students with a migrant background living in a deprived area. Counsellors are trained to deal with the specific barriers faced by this group and there is a target to provide assistance to a particular number or proportion of the affected students in the area and expenditure is allocated accordingly. Students are selected individually on the basis of their disadvantaged situation and expenditure is earmarked accordingly.
  - Students should be counted as participants, but not the counsellors as they are not the target group and no results at individual level are expected for them.

**Q:** Who should be counted as participants in “multilateral” events related to work planning and management (e.g. meetings, exchange of experiences, seminars without a distinct training or counselling element etc.)?

**A:** Output indicators should cover persons benefitting directly from the ESF support under the respective investment priority. Events that aim to contribute to programme functioning rather than to develop human capacity do not benefit individuals directly, but the programme as a whole. Also, the expenditure (cost of the meeting) is not earmarked to support individuals, but to support the programme. Hence the people attending the event should not be considered as participants.

**Q:** How should individuals taking part in more than one operation be counted?

**A:** In the case of multiple interventions that are considered to provide direct support it is necessary to ensure that participants are counted only once per operation. An individual benefiting from support provided by different interventions which are funded by the same operation should only be counted once (for each indicator). The start date (which is the reference for the common output indicators) is the date on which the person started the first intervention and the leaving date (which is the reference for the common result indicators) is the date on which the person left the last intervention. If the interventions are part of different operations, the same individual should be counted under each operation separately (see section 4.1.3 in Annex D of the EC Guidance document on Monitoring and Evaluation).

### ➤ **Output indicators**

**Q:** Is there a common understanding of what target groups the indicator on “Other disadvantaged should cover, or are these defined according to national policy documents?

**A:** The groups to be covered under the indicator “Other disadvantaged” are established by a combination of common and national definitions.

Two groups should be considered:

- Persons with an education level of ISCED level 0 (i.e. persons who have not completed ISCED level 1 and who are beyond the customary exit age of ISCED level 1) should always be counted under “other disadvantaged”;
- It is recommended that persons who are homeless or affected by housing exclusion are counted under “other disadvantaged” (provided the data are collected for the full population of participants and for all years).

Any other groups to be counted as “other disadvantaged” should be established according to national definitions and might include groups such as ex-offenders or drug addicts. Persons living in rural areas may be included as a category of “other disadvantaged” but only when the area in which they reside is recognised nationally as disadvantaged (and if the data are collected for all participants and all years). For this purpose, the national definition of disadvantaged rural areas might use units which are different from those in the DEGURBA classification required for the common indicator on that topic.

The categories of disadvantage adopted for the indicator should not overlap with categories of disadvantage covered by any of the common output indicators that are to be reported on an annual basis (i.e. all common output indicators except those dealing with “homeless or affected by housing exclusion” and “from rural areas” which are to be collected only once in 2017). Persons experiencing disadvantages relating to gender, employment status, age or educational achievement of at least ISCED level 1 should not, therefore, be counted as “other disadvantaged”.

It is strongly recommended to provide project promoters or bodies responsible for primary data collection with a list of the groups to be included in this category as part of guidelines for data collection.



**Q:** Is it required to report a breakdown of the different groups covered under the common output indicator “Other disadvantaged”?

**A:** No. Only the aggregate figures for the indicator (i.e. total broken down by gender and category of region) are required to be reported in the AIR. However, it is recommended to maintain information in the monitoring system that identifies the relevant category (or categories) of disadvantage that applies to each participant that is considered as “other disadvantaged”. This would in fact be imperative in the case that programme-specific indicators are established in respect of particular groups addressed by the programme.

**Q:** How should participants who have not completed (at least not formally) ISCED level 1 be recorded?

**A:** Participants who have not successfully completed ISCED level 1 should be treated in different ways depending on their age in relation to the customary exit age for ISCED level 1 (nationally defined but typically 10-12 years old):

- Those who are below the customary exit age should be considered as if ISCED level 1, and therefore recorded under the indicator for ISCED levels 1 and 2.
- Those who are above the customary exit age should be considered as ISCED level 0 and be recorded as “Other disadvantaged” and not counted in any of the educational attainment indicators (see Annex C1 and section 5.6.4 of Annex D of the EC Guidance document on Monitoring and Evaluation).

**Q:** Is there any minimum number of hours of employment for participants to be counted as “employed”?

**A:** The common output indicator “employed, including self-employed” and the result indicators relating to “participants in employment” do not include any requirement in terms of the minimum number of hours. The definition of employment used for the common indicators is taken from the [EU Labour Force Survey](#) which refers to “any work for pay or profit during the reference week, even for as little as one hour”. As a consequence, all jobs which are in line with the definition provided in the EC Guidance document on Monitoring and Evaluation (Annex C1) should be recorded.

**Q:** How should participants that have moved house shortly after joining an operation be recorded? (regarding the indicator on “living in rural areas”)

**A:** The common output indicator on participants living in rural areas refers to the situation of participants at the date they start the operation. The fact that a participant relocates to another area (rural or not) during an operation is not relevant to this indicator and does not have to be recorded for monitoring purposes (see page 61 of Annex D - Practical Guidance of the EC Guidance document on Monitoring and Evaluation , which has a specific note on this).

**Q:** Is the fact of living in a rural area considered as disadvantage? Do we have to count participants that live in rural areas in the indicator “other disadvantaged”?

**A:** Participants living in a rural area should be counted as “Other disadvantaged” only when the area in which they reside is recognised nationally as disadvantaged. This means that in 2017 a person may be reported as homeless or from a rural area (or even both) and as other disadvantaged at the same time. Note that it should be ensured that the same criteria and definitions are applied across all ESF programmes in the country. Thus, a clear definition and

appropriate guidance should be provided to all organisations in charge of data collection (e.g. project promoters or beneficiaries) in order to ensure consistency of data (see section 4.3 section of Annex D of the EC Guidance document on Monitoring and Evaluation).

**Q:** Does the common output indicator on participants “above 54 years of age” include those who are 54?

**A:** The common output indicator “above 54 years” does not cover participants aged 54, it only includes persons who are 55 or older when joining the operation. Please note that it is recommended that the full date of birth (day/ month/year) is recorded in order to calculate the age of the participants. Moreover, in order to check the completeness of the data it may be useful to have participants recorded in one of the three age categories (below 25 years old; 25-54 years old; above 54 years old).

**Q:** Do we have to keep separate records of all ISCED groups (8) or is it enough to gather information in the three groups (ISCED 1-2, ISCED 3-4 and ISCED 5-8)?

**A:** For the purpose of reporting common output indicators it is enough to record the educational level of participants as falling in one of the three categories required for indicators (ISCED 1-2, ISCED 3-4 and ISCED 5-8). However, it may be useful to maintain in the monitoring system information on the specific ISCED level of the participant, for example, to support the use of programme-specific indicators based on particular education levels or for evaluation purposes (see section 5.5.1 of the Annex D – Practical Guidance of the EC Guidance document on Monitoring and Evaluation for further details).

#### ➤ **Immediate result indicators**

**Q:** Does the common immediate result indicator "participants in education/training upon leaving" include persons who follow a training which is partially subsidised by ESF and which continues after the ESF part has stopped?

**A:** All common result indicators (immediate and longer-term) measure changes in the situation of participants compared to their situation before starting on an ESF operation. In the case that a participant continues in training after the end of a period of ESF supported training then whether or not they should be counted under the immediate result indicator "participants in education/training upon leaving" depends on whether they were in education or training before starting on the ESF supported part of their training. Only participants who were not in education or training before starting the ESF supported training should be counted. See definitions and further guidance Annex C1 and Annex D – Practical Guidance of the EC Guidance document on Monitoring and Evaluation.

**Q:** What is the definition of “qualification”?

**A:** According to the European Qualifications Framework definition, a qualification is “*a formal outcome of an assessment and validation process which is obtained when a competent body determines that an individual has achieved learning outcomes to given standards*”.

The main criterion is that the participants in an ESF operation need to pass a formal examination which attests the knowledge, skills and competence acquired on completion of the learning process. Participants who are given simple attendance certificates at the end of a course should not be counted in the indicator “Participants gaining a qualification upon

leaving". It is recommended to define "qualification" in the national context on national, Operational Programme and/or project level.

**Q:** Is it obligatory that the evaluation of learning outcomes of the participant follows the European Qualifications Framework (EQF) or can also other standards be applied?

**A:** The indicator on "participants gaining a qualification on leaving" uses the EQF definition of a qualification which requires that training outcomes are formally assessed according to "given standards". However, there is no specific requirement to link these standards to EQF levels. Standards should be defined in relation to specific training courses and may be applied on a national, Operational Programme and/or project level. Programme-specific indicators can be elaborated using EQF levels if required.

**Q:** According to the definition of the indicator "Participants gaining a qualification upon leaving", the qualification must be determined by "a competent body". What does this mean? Should educational institutions meet certain requirements (certificates etc.)?

**A:** There are no specific requirements in relation to the "competent body". The competent body could be the institution delivering the qualification or the national body entrusted with the formal examination.

**Q:** Can the organisation responsible for the qualification (e.g. the training provider) certify the corresponding change in the competence of participants?

**A:** If the Managing Authority allows for it, the organisation responsible for the qualification (e.g. the training provider) can certify the corresponding change in the competence of participants.

**Q:** Which immediate result indicators can apply to participants that were neither unemployed nor inactive when joining an ESF operation?

**A:** For participants that at the start date (when joining an ESF operation) are neither unemployed nor inactive (i.e. they are in employment) the immediate result indicators "participants in education and training" and "participants gaining a qualification" can apply. Any person counted in one or both of these indicators and who was also disadvantaged (living in a jobless household, single parent, migrant/minority, disabled or other disadvantaged) would also be counted under the immediate result indicator "disadvantaged participants engaged in job searching, education/training, gaining a qualification, in employment, including self-employment".

**Q:** Which participants should be counted under the result indicators dealing with disadvantaged?

**A:** Both the immediate and longer-term result indicators on disadvantaged ("disadvantaged participants engaged in job searching, education/training, gaining a qualification, in employment, including self-employment, upon leaving", and "disadvantaged participants in employment, including self-employment, six months after leaving") should only include participants who have been recorded in at least one of the following common output indicators (note that people may cumulate several disadvantages):

- participants who live in jobless households;
- participants who live in a single adult household with dependent children;

- migrants, people with a foreign background, minorities (including marginalised communities such as the Roma);
- participants with disabilities; or
- other disadvantaged.

### ➤ Longer-term result indicators

**Q:** Does the indicator on improved labour market situation also cover participants who, due to the ESF support, better meet the requirements of the labour market, even if this has not necessarily led to changes in salary, position, or range of activity?

**A:** No. The definition of improved situation on the labour market is limited to the following criteria (provided in Annex C1 of the EC Guidance document on Monitoring and Evaluation): *“Persons who are employed when entering ESF support and who, following the support, transitioned from precarious to stable employment, and/or from underemployment to full employment, and/or have moved to a job requiring higher competences/skills/ qualifications, entailing more responsibilities, and/or received a promotion 6 months after leaving the ESF operation”*.

Thus, participants who better meet the requirements of the labour market or increase their salary, but have not experienced any change in position, hours worked or range of activity, are not to be counted as “participants with an improved labour market situation six months after leaving”. If you want to monitor the change in meeting the requirements of the labour market it is suggested to set up programme-specific indicators to do so.

**Q:** What is the approach to self-employment in the common longer-term result indicator concerning improved labour market situation? For instance, if a participant with part-time employment decides to launch his/her own business, should it be treated as an improved labour market situation?

**A:** A change from employed to self-employed does not necessarily imply an improvement in the labour market situation of the individual concerned according to the definition of the indicator. For each case, all criteria set out in the definition should be checked irrespective of whether the participant is employed or self-employed.

### ➤ Collecting sensitive personal data

**Q:** Since project providers know the target group on which their projects will be focused, is it possible to collect sensitive personal data for common output indicators (e.g. migrants, people with a foreign background, minorities including marginalised communities such as the Roma) based on estimate figures?

**A:** No. The obligation to collect and store data on individual participants in operations (micro-data) also covers sensitive personal data; there is no derogation in this sense foreseen in the regulations (Regulation (EU) No. 1303/2013 and Regulation (EU) No. 1304/2013). Estimates based on the opinion of project providers will not be accepted.

**Q:** Given the obligation to collect and store data on individual participants (micro-data) what are the recommendations on how to proceed bearing in mind national and European legislation on data protection (Directive EC 95/46/EC of 24 October 1995) and the possible reluctance of some participants to provide this kind of information?

**A:** The obligation to collect and store data on individual participants in operations (micro-data) applies to all personal information required for the common indicators, including those dealing with special categories of personal data according to Article 8 of Directive 95/46/EC (i.e. sensitive data). There is no derogation in this sense in the CPR (Regulation (EU) No 1303/2013). It is recommended that managing authorities liaise and discuss with national data protection supervisors/authorities in order to set up the provisions and framework for successful and timely data collection of all required monitoring data.

In addition, a managing authority may decide to establish a system based on consent through which participants can refuse to provide personal information on variables dealing with special categories of personal data (i.e. sensitive data) that are required for indicators marked with “\*\*” in Annex I of the ESF Regulation (Regulation (EU) No 1304/2013) (i.e. those related to migrants, participants with a foreign background, minorities, disability, and other disadvantaged). In these cases participation records may be left without personal sensitive information, but there should be documented evidence of the attempt of collection.

**Q:** If personal and sensitive data cannot be provided for a participant, does this imply they are not eligible for ESF support?

**A:** No. Eligibility for support is not linked to monitoring and does not require a complete set of data for participants. If a person is not prepared to reveal a complete set of data he can still be supported. There are only two preconditions for someone to get supported:

- a) they fulfil the eligibility criteria; and
- b) the managing authority can document the fulfilment of the eligibility criteria of the respective operation/project (e.g. a certain employment status).

Hence, an incomplete set of data does not affect the participant’s eligibility to the support in general.

Individuals for which non-sensitive personal data (gender, employment status, age, educational attainment and household situation) are incomplete should be reported in the grand total of participants. The grand total number of supported participants (which is at least equal or higher than the total number of participants) should be reported in the framework of the AIRs (see section 3.1.1 of the EC Guidance document on Monitoring and Evaluation and section 4.7.1 in Annex D).

**Q:** Is it necessary to provide a breakdown of result indicators for disadvantaged (“disadvantaged participants engaged in job searching, education/training, gaining a qualification, in employment, including self-employment upon leaving” and “disadvantaged participants in employment, including self-employment, six months after leaving”)?

**A:** No. Apart from the breakdown by gender and category of region that is required for all common indicators no further breakdown is required. Only aggregate figures need to be transferred to the EC via the SFC2014.

**Q:** What data are considered as sensitive?

**A:** Indicators marked with two asterisks in Annex I of the ESF regulation are those for which information to be collected is considered as sensitive, according to Art. 8 of the 95/46/EC directive. These are the following common output indicators:

- “migrants, participants with a foreign background, minorities (including marginalised communities such as the Roma);
- “participants with disabilities”;
- “other disadvantaged”.

As well as the immediate and longer-term result indicators:

- “disadvantaged participants engaged in job searching, education/training, gaining a qualification, in employment, including self-employment, upon leaving”; and
- “disadvantaged participants in employment, including self-employment, six months after leaving”.

### ➤ Drop-outs and re-entries

**Q:** In the case of participants dropping out from operations, is there any minimum attendance requirement for them to be counted?

**A:** No. Data on common indicators have to be collected and recorded for every participant - including the ones who leave the operation early. Note that the leaving date (and therefore the point to which immediate and longer-term result indicators should apply) is always the date that the participant leaves the operation and not the planned exit date.

**Q:** How should participations be counted in projects consisting of a pathway of various steps? Should participants be counted for each step, or at the end of the global pathway?

**A:** Results for a participation record (i.e. a participant) should be reported after the person leaves an operation. If the pathway is one single operation that consists of several projects (stages), then only one result can be reported, namely when the person leaves the operation at the end of the pathway. If a pathway is spread over several separate operations, then both outputs and results for each operation are to be reported separately.

In the case that a person leaves and re-enters the same operation more than once there should be only one participation record with the output indicators referring to the situation on first entry and the result indicators to the situation after the last exit and six months after that date.

For more guidance on this question, see the EC Guidance document on Monitoring and Evaluation (Section 3.1 under Reporting and Annex D section 4.1 "Participants and participation records: some basic rules).

**Q:** When participation records are updated following re-entry into an operation, does the previous result need to be kept and stored in the participation record/database?

**A:** No. It is not necessary to keep the previously recorded result data for participants that re-join the same operation. Only data associated with the initial entry and final exit date are required. Note however, that the system should ensure that any reported indicators including data for a first result are updated accordingly and that the revised results are transmitted to the Commission through the SFC.

## ➤ **Multiple result indicators per participant**

**Q:** Is it possible to record several result indicators for the same participant?

**A:** Yes, a participant may be counted for more than one result indicator. In particular, one or both of the immediate result indicators related to “gaining a qualification on leaving” and “in education/training on leaving” may be combined with an immediate result indicator measuring a change in the labour market situation - either “inactive participants engaged in job searching upon leaving” or “participants in employment, including self-employment, upon leaving”, but not both.

Indicators related to a change in labour market situation are mutually exclusive at each observation point (on leaving or six months later), but not between points, and cannot be combined. For example, the immediate result indicator “inactive, engaged in job searching upon leaving” is intended to measure the transition from inactivity to unemployment, with the definition of “engaged in job-searching” referring to the definition of “unemployed” used for output indicators, which qualifies that persons concerned should be out of work (on leaving). This indicator therefore cannot be combined with the indicator for “in employment, including self-employment, upon leaving”. If a participant who was inactive on joining subsequently takes up a part-time job and at the same time is seeking a full-time job they would be counted only as being in employment and not as newly engaged in job-searching (because they are not out of work).

For the longer-term results the indicator on “participants in employment, including self-employment, six months after leaving” cannot be combined with “participants with an improved labour market situation six months after leaving” because they cover different reference populations – respectively those who were unemployed or inactive on joining and those who were employed on joining (see Annex B in the EC Guidance document on Monitoring and Evaluation).

Indicators that deal with a subset of the full population of participants will always be combined with the relevant full indicator. For example a disadvantaged participant finding work after an ESF supported operation will be counted as “participants in employment, including self-employment, upon leaving” and as “disadvantaged participants engaged in job searching, education/ training, gaining a qualification, or in employment, including self-employment, upon leaving”.

## ➤ **Entities and projects**

### ➤ **Collecting and reporting data for entities**

**Q:** Should data be collected and recorded also for entities that benefit indirectly from ESF support?

**A:** No. In the same way as for participants, monitoring data should cover only entities that benefit directly from ESF support. In the EC guidance it is noted that “Outputs are measured at the level of supported people, supported entities ...” and “Result indicators capture the expected effects on participants or entities brought about by an operation”. As a guiding principle the selection of the most appropriate programme-specific indicator(s) depends on

the specific intervention logic, on the nature of the actions and on who concretely benefits from the actions.

For example, ESF support funds the development (but not the implementation) of new guidelines aimed at improving the functioning of third sector organisations. A government department gets ESF funding and subcontracts the development to a specialist organisation. The government department is supported directly and should be counted. However, the subcontracted company is simply being paid to provide a service and is not supported (thus, not to be counted).

After completion of the project, the guidelines are implemented by a number of organisations; this occurs later as a result of the standard being required by law, and is not a direct result of the ESF support but of the legislation. Therefore has no relevance to monitoring and the organisations that will implement the guidelines benefit indirectly and are not counted as supported entity.

In the case that the ESF also contributed to the cost of implementation of the new guidelines, these organisations would be directly supported and they should be counted accordingly.

**Q:** Is it required to collect and report information such as address, tax identification number, etc. for all entities?

**A:** The only formal requirement is to store information on characteristics needed to complete the common output and any programme-specific indicators for all individual entities supported. However, it should always be possible to demonstrate that reported numbers of supported entities correspond to identifiable organisations that have received support and (if necessary) follow-up entities. Therefore, it is necessary to maintain some basic identifying information about each entity (e.g. organisation name/address or company number). Entities record should have as a minimum: entity identifier, start and leaving dates, data for indicators, operation identifier.

#### ➤ **Supported small and medium-sized enterprises (SMEs)**

**Q:** All companies fulfilling the definition of a micro enterprise are also small and medium, and all small are also medium. Are these categories mutually exclusive, or should a micro enterprise be counted one time per each category?

**A:** The common output indicator on the “number of supported micro, small and medium-sized enterprises” asks only for the total number of SMEs supported. No breakdown by size of enterprise is required and it is therefore not necessary to distinguish between micro, small and medium-sized companies. Enterprises should not be counted more than once for the same indicator.

However, in the case that programme-specific indicator(s) related to enterprises are planned some breakdown by size might be relevant and in this case it is recommended that mutually exclusive categories are applied. A possible breakdown could be defined as follows:

- Micro: enterprises which employ fewer than 10 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 2 million.



- Small: Enterprises which employ fewer than 50 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 10 million, excluding enterprises that qualify as micro-enterprises.
- Medium-sized: enterprises which employ fewer than 250 persons and which have an annual turnover not exceeding EUR 50 million, and/or an annual balance sheet total not exceeding EUR 43 million, excluding enterprises that qualify as micro-enterprises and small enterprises.

Further guidance on definitions of SMEs is offered by DG Internal Market, Industry, Entrepreneurship and SMEs at:

[http://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition/index\\_en.htm](http://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition/index_en.htm).

**Q:** Should only SMEs that are financial beneficiaries of the measures be counted?

**A:** No. Enterprises to be counted have to benefit directly from support but do not necessarily have to receive money directly; they may also benefit from services paid for by ESF but without any money passing through the enterprise. For example, ESF funds may be used to support the training of employees in an enterprise but the payment could go directly to the training company.

**Q:** When monitoring measures that provide funds for SMEs to receive support by external consultants or training providers (which might be also SME), who should be counted under the indicator on supported SMEs, SMEs that receive the training or the providers?

**A:** The indicator on number of supported SMEs refers only to enterprises that benefit directly from support financed by the ESF (which typically excludes SMEs being beneficiaries in the sense of Art. 2 of the CPR (Regulation (EU) No 1303/2013)). Thus, only SMEs that benefit from the training/consultancy services are to be counted under the indicator. Service providers (external consultants or training providers) should not be counted, as they are receiving payment for services as a routine part of their business and not benefiting from ESF support.

**Q:** Can a measure that helps someone to start up an SME be considered as supporting SME?

**A:** All common output indicators refer to the situation of participants or entities before the ESF support starts. If the SME has been legally founded before the start of the support and the support is used to somehow help the business through the start-up phase then it may be counted in the indicator on “number of supported micro, small and medium-sized enterprises”. Individuals benefitting from business counselling, mentoring, training or similar support would also be counted as participants. However, if the SME is legally founded during the support period or afterwards as a result of the support provided then it should not be counted in the output indicator and only the individuals benefitting from support would be counted as participants.

In the case of programmes designed to support the creation of SMEs, programme-specific indicators might be established. Here, a result indicator that aims to count the number of SMEs created through ESF support must be linked to a relevant output indicator based on an equivalent observation unit, for example the number of business plans treated and not the number of persons supported.

**Q:** Can a programme that promotes organisational change and innovation be considered as supporting SMEs?

**A:** Yes, provided that specific SMEs benefit directly from the support. For example, a programme that supports the development of guidance material for SMEs wanting to implement organisational change does not target individual SMEs and those that subsequently access and use the material produced benefit only indirectly from the support. On the other hand, if the programme finances the costs of providing expert advice to specific SMEs that apply for assistance then they benefit directly from the support and should be counted.

**Q:** Can a measure that provides support for individuals that subsequently find employment in an SME be considered as supporting SME?

**A:** No. The support is provided to the individual and not to the SME.

**Q:** Can SMEs acting as beneficiaries and directly benefitting from support be counted in the indicators on entities?

**A:** Usually beneficiaries initiate or initiate and implement an operation that supports a number of individuals or entities fulfilling certain criteria (target group).

Note that there is a difference between a “beneficiary” and an entity “benefitting from support”:

- A beneficiary is defined as a “Public or private body (...) responsible for initiating or both initiating and implementing operations ...” (Article 2(10) of the Common Provision Regulation (1303/2013)).
- An entity benefitting from support is one that receives services or other support paid for (in full or in part) by the ESF which is designed to fulfil the objectives of an operation that targets entities rather than individuals. This is equivalent to the requirement for participants to be persons who benefit directly from ESF support that incurs expenditure.

In order to be counted under the indicator “Number of micro, small and medium sized enterprises supported”, SMEs should, in the same way as for participants, benefit directly from ESF support that incurs expenditure. This does not mean that enterprises have to receive money directly, as they may also benefit from services paid for by the ESF without any money passing through the enterprise. See below some examples:

a) SMEs implementing an operation (fully or partially) without being supported by it:

- The PES, acting as a beneficiary, contracts an SME to provide management training courses to women aimed at helping them confront barriers to promotion in a male-dominated industry.
- The SME is delivering the services offered by the operation and is paid for this out of ESF funds. It is involved in implementing the operation and is not benefitting from support. It should not be recorded under the indicator “Number of micro, small and medium sized enterprises supported”.
- Women benefitting from training should be counted as participants.
- The project should be recorded as a project supporting the participation and progress of women in employment.

b) SMEs being supported by a project without implementing it:

- The PES, acting as a beneficiary, manages a programme to support the training and upskilling of employees in SMEs in declining sectors. Payment could go directly to the training companies.
- Enterprises benefitting from training should be counted in the indicator “Number of micro, small and medium sized enterprises supported”.
- Any SMEs involved as training providers should not be counted as they receive payment for services as a routine part of their business, they are involved in implementing the project and are not benefitting from ESF support.

**Q:** Which indicators are suitable to be used in interventions supporting unemployed to start their own business?

**A:** In order to decide which output and result indicators are relevant, the objective of each operation should be taken into account. If the objective of the operation is to help unemployed people start their own business, then the following common indicators are relevant:

- Common output indicator: unemployed, including long-term unemployed (all people participating in the operation should be counted);
- Common immediate result indicator: participants in employment, including self-employment upon leaving (all participants who are effectively working in their start-ups upon leaving the operation should be counted);
- Common longer-term result indicator: participants in employment, including self-employment, six months after leaving (people whose business is still running 6 months after leaving should be counted).

If the objective of the operation is to support the creation of SMEs, additional programme-specific indicators should be established. Below are some examples of output and result indicators for an operation aiming to help unemployed persons to move into employment by setting-up their own business:

- Output indicator: “unemployed wishing to start their own business”
- Result indicators (immediate): “unemployed who benefitted from start-up counselling and are self-employed upon leaving”
- Result indicator (longer-term): “unemployed who benefitted from start-up counselling and are self-employed 6m after leaving”.

## ➤ Programme-specific indicators

### ➤ Reporting programme-specific indicators

**Q:** Can programme-specific indicators be reported instead of common indicators?

**A:** No. Programme-specific indicators cannot replace the common indicators; the reporting of all common indicators is a basic/fundamental reporting requirement for the 2014-2020 programming period. The objectives set out in the performance framework can be related both to the common and programme-specific indicators. This, however, does not rule out that some of these indicators have the value 0.

Note that the EC encourages the use of common indicators for the development of programme-specific indicators (possibly through combinations of one-dimensional common output indicators, for example, young and low levels of education), since this would reduce the data collection burden and increase the consistency of reporting.

**Q:** The values of the common output and immediate result indicators are to be regularly collected and reported annually. Does this apply also to programme-specific indicators?

**A:** In most cases yes. Programme specific indicators dealing with outputs and immediate results are to be collected on an ongoing basis and reported annually in the AIRs. However, it is also possible to establish programme-specific longer-term result indicators for which the data collection method and frequency of reporting will be determined on a case by case basis.

## ➤ Reporting obligations

### ➤ Obligation to report all common indicators

**Q:** Should "immediate" and "longer-term" result indicators be reported annually?

**A:** Values for all common immediate result indicators, which cover all participants, should be reported annually in the AIR. The common longer-term result indicators, which cover only a representative sample of participants, have to be reported only twice: in the 2018 AIR (to be submitted in 2019) and the final report (to be submitted in 2025).

The requirements for YEI result indicators are different in that both immediate and longer-term results are to be reported annually.

Technical assistance priorities are not required to report on common indicators.

**Q:** Should all common output indicators (including the sensitive ones) be collected and reported for all participants, even in cases of projects that are not addressed to a specific vulnerable group?

**A:** The obligation to collect and store data on individual participants in operations (micro data) applies to all personal data including those dealing with special categories of data according to Article 8 of Directive 95/46/EC (i.e. sensitive data). Zero values may be reported in the case that no relevant value could be recorded under that indicator in the investment priority concerned. There is no derogation in this sense foreseen in the CPR (Regulation (EU) No 1303/2013).

**Q:** Should all common indicators listed under Annex I and II of the ESF Regulation (Regulation (EU) No 1304/2013) be broken down by gender?

**A:** Yes. All indicators on participants should be broken down by gender.

**Q:** Can only a selection of indicators be reported?

**A:** No. Values for all common indicators listed in Annex I and Annex II of the ESF Regulation (Regulation (EU) No 1304/2013), as well as all programme-specific indicators have to be reported for all investment priorities chosen. Zero values should be reported in case no value was recorded under that indicator in the investment priority concerned. Note that every reported participation record should include data for each of the common output indicators covering at least personal non-sensitive data (i.e. employment status, age, education, gender and household situation). In case of any missing non-sensitive data then

the participation record should be considered incomplete and should not be reported in the indicators data (only in the grand total of participants).

**Q:** Are common immediate result indicators listed in the Annex I of the ESF Regulation (Regulation (EU) No 1304/2013) five separate indicators, or is it one sole indicator with five (mutually exclusive) options of a result of the “transition”?

**A:** Common immediate result indicators listed in Annex I of the ESF Regulation are five separate indicators and the results are not mutually exclusive, i.e. if more than one result apply to an individual participant, then all relevant results should be recorded. For example, participants may gain a qualification during the ESF supported operation and then find a job on leaving and should then be counted under both of the relevant result indicators. Further explanation of each of the four indicators can be found in Annex C1 and D of the EC Guidance document on Monitoring and Evaluation.

**Q:** Can a common output indicator not include participants that are not specifically targeted? For example, a measure targets unemployed above 54, but other employed can also participate, which will not be included neither in the target nor in the reporting of the common indicator.

**A:** No. All common indicators should cover all persons supported under the investment priority that fulfil the relevant definitions. The common output indicator "above 54 years of age" should therefore cover all supported persons who are above 54 years old irrespective of their employment status. Selective reporting is not permissible.

If you need to monitor the specific target group more closely, then the common output indicator “above 54 years of age who are unemployed, including long-term unemployed, or inactive not in education or training indicator” will exclude those (aged over 54) who are employed. If this is still not precise enough for effective monitoring of the specific target group then you could establish a programme-specific output indicator for participants who are "above 54 years of age and unemployed".

Note that such a programme-specific indicator would not require the collection of additional data; it could be generated by cross-tabulating the data from the relevant common indicators ("unemployed, including LTU" and "above 54 years").

### ➤ **Fully and partially implemented operations**

**Q:** Does Art. 50(2) of the CPR (Regulation (EU) No 1303/2013) “*data transmitted shall relate to values for fully implemented operation and also, where possible, having regard to the stage of implementation for selected operations*”, imply that only data for fully implemented operations can be reported?

**A:** No. Note that according to Art. 5 (3) of the ESF Regulation (Regulation (EU) No 1304/2013), as a derogation of Art 50 (2) of the CPR, “*data transmitted for output and result indicators shall relate to values for partially or fully implemented operations*”. Thus, the data being reported do not necessarily have to come from fully implemented operations but can come from operations which are still on-going. Example: an operation runs for 2 years. The first year, 100 people participate in the training offered in the context of this operation and the second year 500 people participate. In year 1, the managing authority can report 100

people entering and in year 2 they can report 500 people entering. They do not need to wait for year 2 (when the operation is fully implemented) to report the total of 600.

Note that the data for each indicator collected from partially and fully implemented operations shall be reported in one single data set, i.e. data stemming from fully implemented operations do not need to be reported separately from data stemming from partially implemented operations. In case the monitoring system includes operations that are only partially implemented, the system should be able to identify those participation records which stem from partially and which stem from fully implemented operations.

For further guidance see section 3 and Annex D (section 2.3.2) of the EC Guidance document on Monitoring and Evaluation.

### ➤ **Completeness requirement**

**Q:** Which data are subject to the completeness requirement? Which records should be excluded from /included in the indicators data and used for representative sampling?

**A:** In order to be included in the aggregates for reporting indicators and for drawing representative samples, records have to be complete for all non-sensitive personal data (gender, employment status, age, education level, and household situation) excluding homelessness and from rural areas. Incomplete records should be included only in the grand total of participants figure.

### ➤ **Grand total of participants**

**Q:** What should be recorded under the figure “grand total of participants”?

**A:** The “grand total of participants” covers all supported participants, including those for whom the common output indicators covering personal non-sensitive data could not be collected or are incomplete.

## ➤ **Representative sampling**

### ➤ **Drawing a representative sample**

**Q:** Should groups to which longer-term result indicators do not apply (e.g. children) be included in the representative sample?

**A:** Yes. Samples for longer-term result indicators (and indicators on rural and homelessness for the AIR to be submitted in 2017) have to be fully representative of the total population of participants at the level of the investment priority, and regarding employment status, age group, educational attainment and household situation. There is no exception to this. All individuals counted as participants must be included in the population from which samples are drawn.

**Q:** Should the representativeness of the sample be ensured for the regional dimension?

**A:** As mentioned in section 3.4.2 of the EC Guidance document on Monitoring and Evaluation, ensuring representativeness also for the regional dimension of the output indicators is considered as a good practice, but it is not a requirement. Regional representativeness could be achieved by establishing the sample one NUTS level lower than the level of the programme area (i.e. category of region). For instance, in the case of an

Operational Programme at NUTS 2 level the sample would have the same distribution by NUTS 3 region as observed amongst all participants (see also section 4.4.1 of Annex D).

**Q:** What are the dimensions against which samples have to be representative?

**A:** Representative samples are randomly selected at the level of investment priority to reflect the socio-economic characteristics (variables) of the participants as captured by the common output indicators covering personal non-sensitive data: gender, employment status, age, educational attainment and household situation. Representative samples have to be established per investment priority, category of region (not for YEI), and gender.

### ➤ **Collecting and reporting data**

**Q:** For which indicators data can be collected and reported only for a representative sample instead of the entire population of participants?

**A:** The indicators for which data can be collected only for a representative sample are:

- Output indicator "homeless or affected by housing exclusion"
- Output indicator "from rural areas"
- All longer-term result indicators listed in Annex I and Annex II of the ESF Regulation (Regulation (EU) No 1304/2013)

Refer to section 3.5 of the EC Guidance document on Monitoring and Evaluation (Reporting) for further details on reporting of these indicators.

**Q:** According to the EC Guidance document on Monitoring and Evaluation, it is a "good practice" that the representative sampling is carried out by experts in the field, preferably by an independent body or external experts. Does this mean that beneficiaries or intermediary bodies are not allowed to collect the data?

**A:** No. Beneficiaries or intermediate bodies may collect the data and might assist in drawing the sample. However, since it is important to consider factors with precise statistical meaning when a sample is drawn (size, representativeness, quality, etc.), it is strongly advised to consult an appropriate expert (internal or external), who can design and document this process accordingly.

**Q:** Can indicators where data are to be collected on the basis of a representative sample ("from rural areas", "homelessness" and longer-term result) be monitored for all participants?

**A:** Yes. Collection and reporting on the basis of a representative sample is a "shall" provision for common output indicators on homelessness and rural areas as well as for longer-term result indicators (Annex I of the ESF Regulation). However, collecting and reporting on the full population is certainly considered as representative sampling.

**Q:** Is it possible to collect and report data for indicators from rural areas and homelessness only for those participants that take part in projects specifically targeting these groups?

**A:** No. The indicators have to be reported on the basis of samples that are representative of all participants benefitting from ESF support up to end-2016. Selective reporting is not acceptable.

**Q:** What is the schedule for the collection of data based on representative samples?

**A:** For the collection of the common longer-term result indicators, there are two waves of reporting, and distinct samples with non-overlapping participants should be drawn.

- The first wave (to be reported in the AIR due by 30 June 2019) should cover participants who left operations up to mid-2018. For this wave, sampling might not be possible until end-2018.

- The second wave (for indicators to be included in the final report in 2025) should cover participants who left operations between mid-2018 and 31st December 2023. For this wave, collection might not be possible until mid-2024.

For the two common output indicators "homeless or affected by housing exclusion" and "from rural areas" data shall also be collected based on a representative sample of participants (although collecting and reporting on the full population is certainly considered as representative sampling). These indicators are to be reported only once in the AIR to be submitted in 2017 and the full population to draw the representative sample for the data collection of such indicators must include all participants benefitting from ESF support entering operations up to end-2016. The sampling might not be possible until end 2016.

Note that the YEI longer-term result indicators are to be reported annually and thus representative samples shall be drawn each year. Samples for YEI longer-term result indicators should include participants that left operations 6 months before the reported year ends (i.e. for the AIR to be submitted in 2017, the sample of participants should include participants leaving ESF operations between mid-2015 and mid-2016).

See section 3.1.3 and the summary table on the reporting schedule in section 3.5 of the EC Guidance document on Monitoring and Evaluation.

## ➤ **Baseline and targets**

### ➤ **Target setting**

**Q:** Is it necessary to have targets for all common indicators?

**A:** No. It is not necessary to set targets for all indicators. As noted in the EC Guidance document on Monitoring and Evaluation, quantified targets "*shall be set for a limited number of common and or programme-specific indicators at the level of investment priority and category of region. Limited means in this context that not all indicators need to be linked with a target value*". The only exceptions are the YEI result indicators (both immediate and longer-term) all of which are required to have associated targets.

In general, it is up to managing authorities to select the indicators against which to set targets, based on their relevance to the objectives of the programme. If programme-specific indicators are used, it is possible that targets are applied only to these and not to any of the common output or result indicators.

**Q:** Is there any documentation with recommendations for setting targets for common indicators?

**A:** Following a learning seminar organised in 2013 by the EC, two background papers present methodologies for setting and adjusting quantified cumulative targets related to



employment and social inclusion (“ESF performance target setting and adjusting in social inclusion” and “Setting and adjusting targets for ESF Operational Programmes”), available at: <http://ec.europa.eu/esf/main.jsp?catId=67&langId=en&newsId=8174>

**Q:** How to establish targets for indicators in the case of national Operational Programmes (OPs) embracing more than one category of region? Shall all indicators have target values for each category of region (less developed, more developed, transition)?

**A:** Indeed, each indicator and each target shall be broken down by category of region (with the exception of YEI indicators). Hence the data sets submitted for each indicator cover only one single category of region (i.e. common indicators must be reported broken down by category of region).

**Q:** Shall the baseline value be included into the target value?

**A:** No. Baseline values are not to be included into the target value.

**Q:** When identifying result indicators in the performance framework (Table 6 of the Operational Programme (OP)), shall milestone values be set at the level of the investment priority or the priority axis?

**A:** For the performance framework, milestones and targets should be set at the level of priority axis based on indicators which are a subset of already selected programme indicators (see Guidance fiche performance framework review and reserve in 2014-2020, p. 6).

**Q:** Is it obligatory to set targets broken down by gender?

**A:** No, for either result or output indicators, targets and baselines (where applicable) may be presented broken down by gender in the OP, but this is not a requirement and they can also be expressed only as a total. Note however, that data on all common indicators for participants have to be reported broken down by gender in the AIR (in addition to the total value). Programme-specific indicators data may also be reported broken down by gender, but this is not a formal requirement.

#### ➤ **Output indicators used as basis for result indicators targets**

**Q:** Why is the SFC field "Common output indicator used as a basis for target setting" a mandatory field? Can it be changed?

**A:** Targets for common result indicators shall be set in function of the data reported for common output indicators. In accordance with the EC Guidance document on Monitoring and Evaluation based on the Commission Implementing Regulation (EU) No 288/2014 which includes the model for operational programmes (see table 4), it is not possible to set a target for a common result indicator without choosing a common output indicator as reference (this in SFC means that the field is mandatory).

Alternatively, result indicators can be specified as "programme-specific indicators", in order, for example, to link to more than one common output indicator. In that case the field on common output indicators used as basis is not obligatory.

**Q:** Do the targets for result indicators need to be broken down by all common output indicators?

**A:** No. Target values for result indicators do not need to be set in reference to all output indicators, only to the relevant ones depending on the main target group. The output indicators used as reference should reflect the main target group in the investment priority concerned. Note that some restrictions apply regarding to which common output indicators can be selected for each result indicator.

**Q:** Which common output indicators can be chosen as basis for target setting for each common result indicator?

**A:** The SFC has a drop-down menu that filters automatically the common output indicators to be used as basis. The general rules for the drop-down menu are as follows:

i) Only common output indicators which are relevant to the common result indicator are displayed. For example, this excludes:

- "employed" for the result indicators addressing unemployed/inactive
- "unemployed" and "inactive" for the result indicator related to improved labour market situation
- "below 25 years of age" for the result indicator targeting people aged over 54.

ii) Only one common output indicator can be selected for each common result indicator (for instance, selecting both "unemployed" and "inactive" is not possible). This implies that if you want to set a result indicator that takes as reference population both unemployed and inactive participants you should set up a new programme-specific result indicator.

iii) No common output indicator can be related to the common result indicators related to disadvantaged people.

**Q:** In Table 4 of the Operational Programme (OP), if the target group consists of a combination of two output indicators, for instance "less than 25 with low level of education", should the column "common output indicator used as basis for target setting" be left empty as they cannot both be selected?

**A:** If an intervention has a target group that is multidimensional (and so are the corresponding target values for the result indicators), appropriate programme-specific result indicators should be set. In this case, the column "common output indicator used as basis for target setting" would indeed remain empty (N/a) and the basis should be specified in the name of the indicator.

For example, in an investment priority related to supporting young people, the common output indicator "below 25 years of age" might not really be relevant as only this age group is involved. Instead, it would be more relevant to assess the educational attainment level of participants at the entry into the ESF operation. In this case, where participants with a wide range of educational attainment can participate and expectations for success are very diverse, it is indeed recommended to breakdown the result indicator by educational attainment to avoid the creaming effect and misleading results.

Note that the target value can be expressed either in absolute terms (number of participants) or as a percentage (proportion out of total target group with the result measured by the result indicator).

## ➤ Youth Employment Initiative (YEI)

### ➤ Reporting indicators for YEI interventions

**Q:** What are the reporting obligations for operations under the YEI?

**A:** The ESF Regulation (Regulation (EU) No 1304/2013) sets out the following requirements for YEI reporting (Art. 19(3)): *Indicator data transmitted shall relate to values for the indicators set out in Annexes I and II to this Regulation and, where applicable, to programme specific indicators.* In other words, investments benefitting from YEI funding should report all common indicators listed under Annex I and all YEI indicators listed under Annex II.

Note that the reporting schedule for YEI operations differs from that of regular operations: all YEI indicators have to be reported annually already as from 2015. Representative samples of participants in YEI funded operations need to be selected in order to report on YEI longer-term result indicators on an annual basis (rather than just twice as for the ESF common indicators under Annex I).

For more information, see section 3.1.4 of the EC Guidance document on Monitoring and Evaluation “Specific provisions for Common YEI indicators.

**Q:** What are the output indicators to be reported for YEI interventions?

**A:** There are no specific output indicators for YEI monitoring, only YEI specific result indicators. The output indicators required are the common output indicators listed under Annex I of the ESF Regulation (Regulation (EU) No 1304/2013), which apply to all ESF supported operations, including the YEI.

**Q:** Is there any additional or specific information that needs to be collected for participants in YEI interventions?

**A:** Yes. Information for the YEI immediate and longer-term result indicators (listed under Annex II of the ESF regulation) should be collected. This information concerns the following:

- completion of the intervention upon leaving
- receipt of an offer upon leaving
- educational situation six months after leaving (only for representative samples)
- participants in self-employment (only for representative samples)

Note that more detailed information about the types of education/training programme will be required for particular YEI immediate and longer-term indicators, as they refer specifically to “continued education, training programmes leading to a qualification, an apprenticeship or a traineeship”, and not to any form of formalised education/training.

**Q:** How should indicators be recorded in the case that a person takes part in both activation/motivation activities and an apprenticeship that are part of two different ESF YEI operations?

**A:** Data for all indicators have to be collected and reported for each operation separately. Therefore, data for output and result indicators should be collected and entered for operation A and for operation B separately.

**Q:** Can subsidised employment be considered as sustainable/good quality offer of employment for the YEI indicators?

**A:** The common YEI indicators capturing offers do not contain any reference to quality. So, all offers which are in line with the definition of an offer (see Annex C2 of the EC Guidance document on Monitoring and Evaluation) should be recorded. The assessment of the quality of offers is a subject for evaluation. Please see the guidance on YEI evaluation.

**Q:** Can the same person be counted under all three YEI immediate result indicators (“person who complete the intervention”; “person who receive an offer [...] upon leaving”; and “person in education/training, gaining a qualification or in employment, including self-employment, upon leaving”)?

**A:** Yes. All three YEI immediate result indicators are possible results for one and the same person within the same operation. However, it is important to stick to the requirement that the result indicators for "participant who receive an offer ..." and for "participant in education/training ..." only refer to results that materialise "upon leaving" the operation, or within four weeks of that date, and not later.

For practical guidance and examples on recording YEI result indicators see section 5.9 of Annex D of the EC Guidance document on Monitoring and Evaluation.

**Q:** What is the logic behind the YEI immediate result indicators for unemployed participants?

**A:** All result indicators (common and YEI, immediate and longer-term) measure changes in the situation of participants compared to their situation before joining an ESF funded operation. It may help to consider the chronological steps of a young person taking part in a YEI intervention:

1. Young person becomes unemployed.
2. Young person benefits from YEI supported intervention for a fixed period and completes the planned activities: job placement/training/scholarship/counselling/other. This person would be recorded under the immediate result indicator “unemployed participants who complete the YEI supported intervention”.
3. When the YEI support ends (after the fixed time period mentioned in step 2 above has elapsed), this person:
  - a) is again unemployed;
  - b) finds a new job/training/other opportunity; or
  - c) gets an offer for employment/training.

Options b) and c) would be recorded under YEI immediate result indicators “unemployed participants who are in education/training, [...] upon leaving” or “unemployed participants who receive an offer of employment [...] upon leaving”. Note that it is possible for the same participant to experience b) and c) simultaneously and thus both results are recorded.

For practical guidance and examples on recording YEI result indicators see section 5.9 of Annex D of the EC Guidance document on Monitoring and Evaluation.

**Q:** In relation to the YEI, how should the “not in employment” status be proven? Is it necessary for the target group to be registered in an employment office?

**A:** The ESF Regulation (Regulation (EU) No 1304/2013) stipulates that the YEI should support “young persons not in employment, education or training (NEET), who are unemployed or inactive Persons considered as registered unemployed according to national definitions are always included (even if they do not fulfil all three of these criteria). Although registration in the employment service is not an absolute precondition for considering a participant as unemployed in general, for YEI participants, registration to the employment service is required. As stated in a note circulated to Managing Authorities<sup>1</sup>, “as a first step each potential YEI participant (whether unemployed or inactive) should be registered at the Public Employment Service (PES) or equivalent body, including e.g. private providers acting on behalf of the PES and performing individual profiling and placement activities for the unemployed”.

**Q:** Should YEI indicators be included in the performance framework?

**A:** The YEI is to be included in the performance framework as it has not been excluded from it in Article 22 (1) CPR. As set out in Art. 4(1) of the Commission Implementing Regulation on the Performance framework (Regulation (EU) No 215/2014):

*“The bodies preparing programmes shall record information on the methodologies and criteria applied to select indicators for the performance framework to ensure that corresponding milestones and targets comply with the conditions set out in paragraph 3 of Annex II of Regulation (EU) No 1303/2013 for all programmes and priorities supported by the ESI Funds, as well as the specific allocation to the Youth Employment Initiative ('YEI') as referred to in Article 16 of Regulation (EU) No 1304/2013 of the European Parliament and of the Council, subject to the exceptions set out in paragraph 1 of Annex II of that Regulation (EU) No 1303/2013.”.*

The resources for the YEI are, however, excluded for the purpose of calculating the performance reserve (Art. 20 of the Regulation (EU) No 1303/2013). For the YEI the milestones set for 2018 correspond in value to the target for 2023 as the YEI is frontloaded (the YEI specific allocation is committed in 2014 and 2015).

### ➤ **Intervention vs. operation**

**Q:** Does “upon leaving” mean that the person should leave all the activities within the same operation before the final result can be counted/reported?

**A:** Yes. Results should only be collected once a participant has completely left an operation.

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<sup>1</sup> Clarifications by the Commission services following the YEI Seminar on 11 July 2014 – note circulated to all Managing Authorities on 4 August 2014.

**Q:** Should “upon leaving” be interpreted as the end of the operation or the end of the intervention for a single participant?

**A:** Immediate result indicators refer to the situation of each individual participant “upon leaving” the operation, which is the date of exit from the operation (i.e. the last date on which the person was participating in an operation) or up to four weeks after that date. The date of exit may vary for each participant and cannot automatically be taken to be the end of the operation or the envisaged end date of the intervention for this participant. The exit date should be treated as an individual observation that varies between participants. In all cases the exit date of each participant needs to be recorded (whether it coincides or not with the end date of the operation). For further clarification see examples in section 4 of Annex D of the EC Guidance document on Monitoring and Evaluation.

Note that there is a difference between "complete the YEI supported intervention" and "upon leaving". The completion of attendance is linked to the participant's individual duration of stay in the operation and not to the duration of the operation or project overall. E.g. an operation runs for two years and during this time runs the same course four times. The project/operation will be completed once all four courses are done. A person will only plan to participate in one of the four courses and not in all four. Hence the completion date with regard to the participant cannot be linked to the completion date of the operation or project. So the completion in this case would be when the person completed the one course as initially scheduled. Therefore the word “intervention” has been chosen and not operation or project for this type of indicator.

**Q:** Which date is the start date of an intervention: the date of registration with the labour exchange (or any other institution if it's foreseen), or the date when the activities foreseen in the individual plan start?

**A:** The starting date of the intervention for YEI monitoring is the date when the participant begins activities within a YEI-funded operation. This may be some time after the initial registration date.

**Q:** For the YEI immediate result indicators on participants who complete the YEI supported intervention, does the indicator include those participants dropping out before the scheduled end of the intervention because of having a job or an education/training offer?

**A:** No. The intention of these indicators is to measure the fact of completing the YEI intervention; therefore, drop-outs are not included. If a person drops-out because s/he finds a job, this person will be reported under the YEI result indicator relating to participants in employment.

#### ➤ **YEI and Youth Guarantee (YG)**

**Q:** Is “intervention” the activation of a person within four months after registering with the labour exchange with the aim that s/he would be willing and ready to accept one of the offers?

**A:** An "intervention" as understood for the YEI indicators cannot automatically be linked with the four month period set by the Youth Guarantee (YG) Recommendation for providing a young person with an offer. The indicator refers to the support a person receives through YEI, e.g. a training course. The support can cover activation measures (the so called YG

Service), measures which could qualify as a Youth Guarantee offer and/or other types of measures. The ESF Regulation (Regulation (EU) No 1304/2013) does not stipulate a minimum or maximum duration of an intervention or at which point after leaving formal education or becoming unemployed the person should receive or is even entitled to the support (in the sense of YEI support).

**Q:** How do the YEI immediate result indicators comply with the receipt of an offer within a four month period after becoming unemployed or leaving formal education?

**A:** The four month time period of the Youth Guarantee cannot be linked to the ESF. This type of time lapse would not necessarily be monitored through the ESF.

**Q:** Are the entry and exit dates for monitoring participants in the YEI and in the YG service phase the same?

**A:** Generally, YEI operations support the provision of actual offers. Therefore the exit and entry dates for YG service phase and YEI do not coincide.

**Q:** Is the re-entry of participants treated in the same way in the YEI and in the YG monitoring?

**A:** No. In YG monitoring each start is counted, irrespective of the number of times the same participant has been through the service phase. For YEI monitoring (as with the general ESF monitoring) individuals are counted only once per operation (by updating their existing participation record on re-entry).

**Q:** Are the follow-up indicators for YG the same as the longer-term result indicators for the YEI?

**A:** No. The YEI longer-term result indicators are to be recorded 6 months after having left the YEI operation, and they capture only positive results. By contrast, the YG “follow-up” indicators cover both positive and negative outcomes (i.e. participants who are still unemployed and inactive have to be reported as well as those in employment or education/training). In addition, YG follow-up indicators are to be collected 6, 12 and 18 months after the exit.

## ➤ Operations with special focus

### ➤ Innovation

**Q:** How could innovation be measured for innovative model projects or projects that support social innovation and innovative enterprises? What should be reported for this type of projects?

**A:** There is no difference between “regular” and innovative projects in terms of monitoring. Common indicators have to be reported for all projects under all investment priorities. Where the common indicators are not directly relevant to the objectives of the programme, then programme-specific indicators should be developed. Examples of programme-specific indicators to monitor progress in terms of innovation could be:

- number of projects dedicated at promoting social innovation (output indicator – project related);
- number of innovative enterprises supported (output indicator – entity related)

- number of entities supported to introduce innovative forms of work organisation, including family friendly working time arrangements (output indicator – entity related);
- number of supported entities that have introduced innovative forms of work organisation, including family friendly working time arrangements (result indicator – entity related).

### ➤ **Rural areas**

**Q:** If an OP is specifically targeting rural areas, do these areas have to be defined according to the DEGURBA methodology (category 3), or can they be determined differently?

**A:** The managing authority is free to set objectives for rural areas or other regions using the classification that most suits its objectives, provided the reporting requirements laid down in the Regulations are fulfilled. As mentioned in the EC Guidance document on Monitoring and Evaluation, *“Recording of participants is not done based on the participants’ place of residence or employment, but based on the location where the operation takes place. The only exception to this provision is the common output indicator “from rural areas”, where the data is always recorded based on the participant’s place of residence”*. Like all other common output indicators, the common output indicator “from rural areas” (which is indeed defined as category 3 of the DEGURBA classification) is not linked to specific activities, but has to be reported at the level of the investment priority. As a minimum requirement, data for this indicator have to be reported only in the AIR due in 2017, based on a representative sample of participants within each investment priority.

### ➤ **Institutional/administrative reform**

**Q:** Which indicators shall be used to monitor operations supporting institutional or public administration reform, where no direct participants are identified?

**A:** Values for all common indicators listed in Annex I and Annex II of the ESF Regulation (Regulation (EU) No 1304/2013) have to be reported for all investment priorities chosen, including any focusing on institutional aspects.

The common indicators on participants capture only participants benefitting directly from the ESF support. In case there are no relevant participants zero values should be reported.

Where the common output indicators do not reflect the outputs of the investment priority – as in the case of institutional/administrative reform- programme-specific indicators should be developed. Separate guidance is provided on the types of indicators that might be established: see Guidance Document on Indicators of Public Administration Capacity Building for guidelines in this respect.

Note that it is the responsibility of the Member State to develop programme-specific indicators in all areas of the programme where they see the need for. Indicators can – but do not have to - be very specific in order to highlight certain aspects of the ESF support which are of particular importance for the Member States/regions.

### ➤ **Technical assistance (TA)**

**Q:** Is it obligatory to monitor all common indicators for priority axes concerning technical assistance (TA)?

**A:** Values for all common output indicators should be reported for all investment priorities chosen, excluding technical assistance priority axes.



Reporting result indicators is generally not required. However, where the Union contribution to the priority axis or axes concerning TA in an Operational Programme exceeds EUR 15 million, result indicators will have to be reported where objectively justified given the content of the actions.

Note that according to Article 96(2)(c)(iv) of Regulation (EU) No 1303/2013, for each priority axis concerning technical assistance, the Operational Programme shall set out “the output indicators which are expected to contribute to the results”. It is thus a legal obligation to set and report output indicators and corresponding values (either programme-specific output indicators or common output indicators).

Member States can use the common indicators when relevant or define their own (output and result) programme-specific indicators which better reflect the interventions covering TA (see section on Technical assistance in Annex D of the EC Guidance document on Monitoring and Evaluation).

**Q:** Who should be considered as participants for technical assistance (TA) operations?

**A:** Data for (common) indicators on participants capture only persons that benefit directly from ESF support. As a rule, it is not required to report on common output indicators for TA operations. However, if a TA project includes specific objectives that involve the provision of personalised support (e.g. training) to specific individuals then these persons may be counted as participants. This includes people involved in the audit, IT system, evaluations etc. provided they are targeted by the specific objective of the TA operation and they benefit directly from support.

## ➤ Data management

### ➤ Storage of micro-data

**Q:** Can the personal data and data for indicators be recorded and stored in separate IT systems/databases (i.e. IDs)?

**A:** Yes. The structure of the monitoring system is not prescribed. Although the CPR (Regulation (EU) No 1303/2013) requires Member States to collect and store detailed data about each participant (i.e. to maintain micro-data) there is no specific requirement for the data to be stored all together in one place or at any particular organisational level. So, as long as the monitoring system as a whole fulfils the minimum requirements for monitoring and evaluation then the design is up to Member States (see section 2.2 in Annex D of the EC Guidance document on Monitoring and Evaluation). In this respect, it is necessary that the system can link participation records with IDs and personal contact details in order to:

- provide evidence that each of the aggregate figures reported (at IP level) as indicator values in AIRs relate to identifiable individuals who have the relevant characteristics and who actually received support from the relevant operations;
- allow for representative sampling (full data-set necessary);
- provide contact for follow-up surveys (longer-term result indicators).

All participant records should include, as a minimum: an operation identifier (a code that links a participant to a specific operation); some sort of unique personal identifier that

allows an individual to be traced and re-contacted (if selected for a representative sample); dates of starting and leaving an operation. As far as the data for the representative sample are concerned, personal data do not need to be asked again: the information collected for output indicators should always be used as the reference point for both immediate and longer-term result indicators.

**Q:** Is there an obligation to use personal identifiers in order to fulfil the new requirements to record and store individual participant data at individual level?

**A:** The monitoring system must be set up in a way that it permits the managing authorities to perform the tasks related to monitoring and evaluation as set out in Art. 56 CPR (Regulation (EU) No 1303/2013) and Articles 5 and 19(4) and (6), Annex I and II of the ESF Regulation (Regulation (EU) No 1304/2013). This implies that all participant records should include some sort of unique personal identifier that allow an individual to be traced and re-contacted (in case they are selected for a representative sample), as well as the operation identifier and dates of starting and leaving the operation. Personal identifiers can be used to link ESF monitoring data with records from national registers, but this is not a requirement.

**Q:** Is it obligatory to collect and record personal identifiers for all participants?

**A:** There is no formal requirement to collect an existing personal identification number. However, the possibility to uniquely identify each individual in the micro-data is a minimum requirement for monitoring systems (e.g. to ensure that all participants can be re-contacted at a later date in case they are selected as part of a representative sample). As a result, it is recommended that an existing personal identifier, such as the social insurance number, is used since this is:

- a) normally straightforward to collect, and
- b) can be used to extract relevant data from other administrative registers and thereby reduce the burden of data collection.

However, this is not obligatory and in some cases might conflict with data protection legislation. It is also possible that a unique personal identifier is generated by the monitoring system specifically for the purposes of ESF monitoring. In this case evidence of a robust methodology would be needed for audit purposes.

**Q:** What if the obligation to record and store individual participant data is not in line with national legislation regarding the storage periods of the data?

**A:** The requirement to collect and store individual participant data is laid down in Art. 125(2)(d) of the CPR (Regulation (EU) No 1303/2013) dealing with functions of the managing authority. Member States should adapt their systems, if needed, in order to comply with it. In addition, the annexes to the ESF Regulation (Regulation (EU) No 1304/2013) state clearly that the data processing arrangements put in place by Member States must be in line with the provisions of Directive 95/46 of 24 October 1995 on the protection of individuals with regard to the processing of personal data, in particular Articles 7 and 8 thereof.

Further to Art. 6(1)(e) of the above mentioned directive, the personal data must be "kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data were collected or for which they are further processed". The

purposes are set out in the above mentioned articles and annexes of the CPR and the ESF Regulation. In addition, the duration of data retention is also influenced by the evaluations conducted by the Member States and the Commission. For example, impact evaluations often use counterfactual methods with control or comparison groups, which require information on the situation of the participants throughout the implementation period. To this end, data on individual participants are needed.

**Q:** Is it possible to use existing registers or administrative data (e.g. population register, social insurance register, unemployment register, etc.) to collect participants' data for ESF monitoring?

**A:** Yes, the use of registers is recommended since it avoids collecting again information that already exists. For the use of existing register(s) to maintain micro-data for ESF purposes, the following questions should be considered:

- Will it cover all participants? If not, how/where will you store the micro-data for participants who are not covered? How will this be merged with the data in the register when compiling indicators or developing representative samples?
- For which of the common indicators does the register include the required information? Are the relevant variables recorded in a way that is consistent with the definitions? If not, how to deal with the gaps/differences?
- Will data be maintained in the register for long enough (ESF monitoring /evaluation/ audit)?
- Are adequate procedures/agreements in place to ensure that any requests for detailed information are fulfilled comprehensively and in a timely manner?
- Is the information up-to-date?

### ➤ **Data transmission**

**Q:** What kind of data should be reported and in what format (i.e. individual participant level or aggregate level)?

**A:** Values for all common (output and result) indicators have to be reported for all chosen investment priorities (IP). Zero values may be reported if no relevant value was recorded under that indicator in the IP concerned (for example, there may be zero participants below 25 years of age for operations funded under the investment priority on active and healthy ageing).

Only aggregated data for each of the common indicators and any additional programme-specific indicators should be entered to SFC. All indicator values to be reported are aggregates for the period (year). Data should be aggregated at the level of investment priority, and all indicators related to participants must be broken down by gender (i.e. include separate values for men and for women) and by category of region (the latter does not apply to YEI operations).

The monitoring system should have automated procedures for calculating the necessary aggregates from the micro-data. The total number of participants in each year does not need to be reported as a separate value: it will be automatically calculated as a sum of three

common output indicators “Employed”, “Unemployed” and “Inactive”. Note that this is the only combination of output indicators that can be used to derive total participants.

Data should be reported for completed and partially implemented operations alike. In cases where an operation is on-going at the end of a year this means that numbers of participants covered by immediate result indicators may not match those covered by output indicators, because some of the participants that contribute to the output indicators are still actively participating in the operation and do not yet have an associated result.

See section 3.4.4 (Data protection) in EC Guidance document on Monitoring and Evaluation and section 4.6 (Aggregation procedures) in Annex D.

**Q:** Can the beneficiaries and monitoring system record and transfer cumulative data instead of annual data, if data submitted into AIR are still annual?

**A:** The design of monitoring systems and the methods used to transfer data between beneficiaries and managing authorities are not prescribed. Nevertheless, there are some minimum requirements in terms of the need to store micro-data for all participants, the annual reporting schedule, and the need to ensure quality of data (see section 2 in Annex D of the EC Guidance document on Monitoring and Evaluation).

In terms of transferring cumulative data between beneficiaries and managing authorities then whether or not this is a reasonable approach depends on what is transferred. If a full set of micro-data covering all participants to date is transferred then there should be no problem as the managing authority can prepare data for annual reporting purposes based on the start/end dates associated with each participation record and perform checks to identify any revisions to previously reported data and ensure the appropriate treatment. If only cumulative aggregates are provided then, in theory, annual figures can be derived each year by subtracting the values sent in previous years but there is then no obvious way to check for revisions. Unless suitable procedures are put in place to ensure that any revisions to previously reported data are appropriately identified and treated then this approach is unlikely to satisfy basic requirements for data quality.

**Q:** Will it be possible to apply retroactive changes to previous periods with annual reporting?

**A:** Yes. SFC allows to retroactively update monitoring data in case of changes in participation records or to correct errors in recording for already submitted AIRs. Further clarifications on what constitutes an update or a correction of reported data are included in an [explanatory note](#) submitted by the Commission to the ESF Technical Working Group to its meeting on 24-25 March 2015.