

Building Better Opportunities



Guide to delivering European funding

Section eleven: Evidence and retention

About this guide

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

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

For the full contents visit our website [here](#)

How to contact us

- ✓ If you are a **lead organisation** involved in delivering a project, the best way to get in touch is through **your funding officer**.
- ✓ **Other organisations** should email us at esf@biglotteryfund.org.uk

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

Summary of changes

May 2017 - Lottery logo updated.

March 2017 - Delayed quarterly update, with updated logo.

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

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

Any changes to the Guide will be:

- ✓ communicated on our website and on the inside page of each section

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

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11.1 The importance of retaining evidence

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

‘Claw back’ is a major risk to your project and the organisations involved in delivering it.

The Managing Authority and the European Commission could carry out audits on **any** organisation involved in the delivery of the project at any time. An audit can include anything from a spot check of your expenditure to a full investigation of your participant files. This may happen at random, both during the project and up to ten years after the final payment from us. We predict the retention period will end by 31 December 2026.

If any of the evidence that the Managing Authority or the European Commission requires is ineligible, missing or incomplete, we may be forced to reclaim some or even **all** of the previous payments we’ve made.

As the body directly accountable to us, it is the lead organisation which bears much of the risk. If they are audited years later and haven’t retained the right documentation, all money paid could still be clawed back by the European Commission.

For this reason, we will check your records and evidence throughout to ensure the risks are being managed. We may withhold payments if the evidence you retain is incomplete, inaccurate or unclear. We may also recover funding from you if errors are discovered in any past evidence that you have supplied to us (see **Section four: Payments and monitoring**).

It is therefore extremely important that you do not underestimate the time required to collect, check, report and store evidence.

Storing evidence safely

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

1. update your policies, procedures and staff training plans to manage the risks associated with handling and storing evidence securely in all areas of your business.
2. take account of the extent to which staff involved in the project can access this evidence; ensuring that only authorised people can access, alter, disclose or destroy information.
3. ensure you have the right physical and technical security across the various premises, filing and computer systems being used.
4. ensure that any personal data held or used by a third party (such as a web-based cloud service) is secured appropriately, bearing in mind current legislation.

You should back-up your records regularly to help mitigate the risk of loss or destruction of key evidence. You should also ensure that you monitor security and legislative requirements during the lifetime of your project and make any amendments to your arrangements as required to comply with those changes.

11.2 Types of evidence

We've provided detailed guidance about the types of evidence you need to retain across the Guide. For ease of reference, we have given a summary of the key pieces of documentation required over the next few pages.

Section three: Getting started

- ✓ Evidence collected as part of grant set-up.

Section four: Payments and monitoring

- ✓ An up-to-date payment schedule with copies of all past versions.
- ✓ Details and financial records covering any adjustments made, including money that we have had to reclaim.
- ✓ Project progress reports covering the full lifetime of the project.
- ✓ Evidence to validate anything you've reported to us around the progress of the project.
- ✓ A full record of the changes we have agreed to your project.

Section five: Targets and project outcomes

- ✓ An up-to-date target and project outcome schedule with copies of all past versions.
- ✓ Accurate participant information from which your output and result targets are derived.
- ✓ A full record of the remedial steps and interventions taken to manage any under-performance.

Section six: Participants

- ✓ Evidence to prove eligibility against the target groups identified on the project outline.
- ✓ A complete participant file, containing:
 - a signed participant entry form
 - evidence of right to work in the UK, such as a signed copy of a passport
 - evidence of employment status, such as a signed copy of a benefits letter
 - a signed participant progress form that includes a full record of their attendance
 - evidence that needs analysis, development planning or progress reviews have taken place
 - evidence of progression through the project, such as signed attendance sheets, course notes and submitted work
 - a signed participant expenses, incentives and allowances form for covering any participant payments
 - details and receipts of any expenses, incentives or allowances
 - a signed participant exit form
 - evidence that the participant has achieved specific results, such as a letter from an employer or certificates from qualifications.
- ✓ Evidence to prove that the participant has refused consent to provide sensitive personal information. This must be in the form of a fully completed declaration on the participant entry form.

Section seven: Partners and procurement

- ✓ An up-to-date and signed partnership agreement with copies of all past versions.
- ✓ All procurement records, documents and evaluations together with any communication from us to agree your broad approach.
- ✓ Copies of all tender documents, including any quotes.
- ✓ A detailed procurement register and records of all contract management activities that have taken place.
- ✓ A clear trail of all payments and deliverables.

Section eight: Costs and expenditure

- ✓ Evidence that all costs you are claiming for are eligible under ESF guidelines.
- ✓ Appropriate and original evidence relating to each and every item of expenditure, including time sheets, payslips and receipts.

Section nine: Publicity

- ✓ Full acknowledgement of the funding received from the Big Lottery Fund and the European Social Fund on all:
 - posters
 - print and electronic materials or publications
 - job descriptions
 - procurement documents
 - websites
 - media and public relations work
 - event, conference or workshop publicity.

- ✓ Awareness from participants of the role of the Big Lottery Fund and the European Social Fund in the project. The Managing Authority will carry out a survey of a sample of your participants to establish this.

Section ten: Cross-cutting themes

- ✓ Your policies relating to sustainable development, gender equality and equal opportunities at organisational and project level.
- ✓ Evidence that the lead organisation has led by example, backed up by an Action Plan that shows a genuine and meaningful commitment by partners.

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- ✓ Your document retention, storage and usage policies.

Section twelve: Projects based in London

- ✓ Full evidence that a result of ‘sustained employment’ has been met, whether in the form of a phone conversation, survey or meeting. This should be contained in the participant file.
- ✓ Past versions of any templates used when completing the Employability Performance Rating tool, including those done by partners.