



Guide to delivering Greater Lincolnshire BBO projects

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Summary of updates to version 5:

- Eligibility criteria and the use of self declarations
- Some updates to 'evidence of meeting essential criteria', particularly that short form birth certificates will now be accepted by the funder
- Evidencing outcomes is no longer required, but an exit form Annexe J will be required, dated within 4 weeks of the start date of any claimable outcome
- Self declaration forms are no longer necessary as a self declaration option is now included in the enrolment form, Annexe H
- Updated guidance re document storage and GDPR
- Updates to the checklist to reflect changes in the guidance
- Receipts/ invoices attached to Annexe N must now be certified as true copies, as per all other evidence
- Reminder to initial any changes made to Annexes

Eligibility criteria

In order for us to be able to fund a participant, they must meet four **essential criteria**:

1. They must be unemployed or economically inactive and not in any paid work
2. They must be legally eligible to live and work in the UK
3. They are aged over 18 unless they meet the NEET criteria
4. If they are on any other ESF programme, we must be able to show that we are working with the other programme and not duplicating effort. See later in this document for more information.

If **ALL** of these criteria cannot be satisfactorily evidenced, the participant cannot be supported by BBO projects.

Employment status

A person is defined as **unemployed** if they do not have a job, but do want one and have been actively looking for a job over the last four weeks and are able to start work in the next two weeks. They may be on Jobseeker's Allowance (JSA) or Universal Credit (UC).

A person is **economically inactive** if they do not have a job - *whether or not* they want a job - but don't meet the criteria for being unemployed (i.e. *haven't* been actively job seeking in the last 4 weeks and/or *would not* be available to start work in the next 2 weeks). They may be in receipt of certain benefits, such as Incapacity Benefit (IB), Income Support or Employment and Support Allowance (ESA) and could also be in training or education of some kind (including full time students). They may be Universal Credit claimants who are placed in the Work Preparation Requirement or Work Focused Interview Requirement conditionality groups, or may not be in receipt of any benefits.

People who would be ineligible:

- Anyone who has even **one hour's work a week** or **on a zero hours contract** is **not** eligible for support through BBO, even if they are on benefits and doing permitted hours' work.
- Anyone on an apprenticeship or other paid/ incentivised work scheme
- Anyone who is self-employed or setting up a business
- Anyone on maternity/ paternity leave (even if this is unpaid) or temporarily absent from a job through illness, holidays or education

Evidencing employment status:

We can't assume that benefits are a definite indicator of participants' status as unemployed or economically inactive, as people are permitted to work some hours and still receive these benefits (making them ineligible: see above) and the transfer to Universal Credit could also create confusion.

There is now a self-declaration option on the enrolment form. **The self-declaration option should only be used when trying to provide any of the other preferred options have been exhausted.** If you provide a self-declaration rather than the preferred evidence, we need to

know what you did to try to get the preferred evidence option and why you did not succeed in obtaining it. Any self-declarations will be closely scrutinised, and you must keep as much evidence as possible to show what you've tried to do to gather the preferred evidence. If in doubt, do please contact the project coordinator who can discuss individual cases with the funder. There is a box on the enrolment form that needs to be filled in to explain a self declaration (also called a 'risk based exception'): **this replaces the self declaration form that was previously used**. Please ensure that you fill in all the relevant boxes on the enrolment form.

Evidence must be collected at the point of enrolment and before delivering any funded activity: if the participant later turns out to be ineligible (or unable to prove eligibility) then BBO will not fund any support they have received, and the Partner organisation will have to cover these ineligible costs. We cannot report to the funders on any participant for whom all of the enrolment data and evidence has not been collected.

There is a '**hierarchy of evidence**', with the strongest evidence being classed as 'tier 1'. This goes down to 'tier 4', which is basically just for exceptions. **All partners are expected to make every effort to obtain tier 1 evidence** in the first instance, before then trying to find tier 2 evidence and so on: any evidence submitted which is not classed as 'tier 1' will need to be accompanied by some narrative explaining what was done to try and obtain tier 1 evidence, why this was not possible for that particular beneficiary, and why you decided to BBO onto tier 2 (for example, many people who are economically inactive would find it possible to provide tier 1 evidence).

Residency and right to work in the UK

People can live in the UK without the right to work here, but people with the right to work will always have the right to live here. So, a single check on a participant's right to work would meet both parts of this eligibility requirement. The checks for participants required by the funders mirror the legal requirement of employers to carry out similar document checks.

The simplest way is to check, copy and certify a **passport**, but this will not always be possible as participants may not have a passport (nb – a UK or EU passport can be out of date and used as evidence).

UK citizens without a passport will need a **birth certificate AND** an official document (such as a letter from DWP) giving their name and **NI number** (we can help them to obtain both of these documents: see 'Obtaining Tier 1 or Tier 2 Evidence' later in this document).

Please note that the funder's guidance changed a few months after the start of the BBO programme and evidence of an NI number alone is no longer sufficient.

Asylum seekers are not usually eligible for ESF support, but refugees are. Asylum seekers are not generally allowed to work while their claims are being decided, but if this decision takes more than 12 months they may apply for permission to work. If this is the case, it would be

stated clearly on their Application Registration Card. This would mean that they are eligible for ESF support on the BBO programme.

There is now an option on the enrolment form (Annexe H) regarding the provision of alternative evidence to prove residency. It remains expected that almost all participants should be able to evidence this, as BBO will pay for copy birth certificates. Please only use this option as a last resort.

Age

There is no upper age limit for participants, but the aim of the BBO programme is to support people who will contribute to the economy by getting into work or increasing their skills levels. So, if a potential participant is retired but still seeking paid work, you will need to be able to demonstrate this to auditors.

The lower age limit for participants is dependent on NEET status: young people aged 16-18 are eligible for support if they are NEET, or they would be eligible if aged 15-18 and **at risk** of becoming NEET. Young people aged under 15 are ineligible.

Participants on more than one ESF-funded programme (not including other BBO projects)

At the point of enrolment you must ask whether the person is receiving support from any other ESF-funded project. If they are unsure, but they are receiving support from other services, you may need to check how that other service is funded.

This does not apply to projects that are funded by sources other than ESF, but if a potential beneficiary is receiving support from another employability service it may be worth questioning the value of BBO to them: would it be duplicating the help they are getting elsewhere? If so, BBO may not be appropriate for them. If you feel it would be of use to them, it is important that you get confirmation from the other programme that they are happy for you to enrol the participant: see page 16 of this document for more information.

A participant can take part in activities run by two separate ESF projects at the same time, provided the activities are covered by the respective Individual Learning Plans, **complement and do not duplicate each other** – and enable the participant to progress towards their employment goals.

In these cases, we would need to contact the other project, explain what support we will be offering, and check there will be no duplication. You will **always** need to get a letter from them to confirm that they are happy for the participant to join BBO, and that there will be no duplication of support.

In circumstances where there is a justifiable case for the participant to be supported by more than one ESF programme, the projects should retain evidence that they are aware of each other's activity and that the activity is complementary, eligible and assists the participant to meet

their overall employment goals, for example by getting in touch with the Work Programme advisor every so often to discuss what you've both been doing, and to keep a note of this conversation (or copy email) on the participant's file.

It is thus important to ask participants at their initial meeting "Are you currently working with any other ESF Funded support?" (perhaps giving some examples of local programmes, as not everyone is aware of how projects are funded). This then ensures that early contact is made, before costs are incurred, and the necessary conversations can take place and can be recorded for audit purposes.

If you have any questions, do please contact the project coordinator as this is an area which has potential for causing compliance issues, and thus clawback. There is more information in the FAQ section of this document regarding people being on multiple BBO projects.

The 4 tiers of evidence

<p>Tier 1</p>	<p>You must always request '1st tier evidence' in the first instance. The lower tiers of the hierarchy must not come ahead of preferred evidence for reasons of convenience or simplicity, and auditors will be alert to any sign that the project is not following the hierarchy, for example by comparing practices against comparable projects.</p> <p>It's very important to know that this hierarchy does not mean that more potential participants should be turned away than if self-declaration were the preferred evidence.</p> <p>It means, though, that the judgement on eligibility must be made (and documented) on information and documents presented by potential participants, and the reasons given for not having any stronger evidence. Support from the project should only be refused when project staff are not convinced that an individual is eligible (or does not have good reasons for not having any stronger evidence).</p> <p>1st tier documents will very often be impossible for economically inactive people to obtain.</p>
<p>Tier 2</p>	<p>A referral or written confirmation from a third party is acceptable, provided an attempt has been made to obtain more robust evidence, and the reasons for not obtaining it are credible.</p> <p>The referrer should provide a written statement. It must be signed, dated, and at least contain: the name of the participant, the name of the project (preferably) and the eligibility criteria being confirmed (e.g. right to work).</p>

<p>Tier 3</p>	<p>Documents that are too old but otherwise meet the eligibility criteria, or only partly evidence that the participant meets the eligibility criteria.</p> <p>Examples might be any letters from a statutory authority, documents which do not fully identify the individual, documents that are more than 12 months old, and so on. As before, there must be plausible reasons for not obtaining stronger evidence, and an explanation also provided as to why the alternative evidence is credible as evidence of eligibility.</p>
<p>Tier 4</p>	<p>Self declaration may only be used as evidence of progressions when no other evidence is available. It may NOT be used as evidence of eligibility.</p> <p>If using tier 4 evidence, you must consider whether an exception to the evidence requirement can be justified. If so, you must document:</p> <ul style="list-style-type: none"> • the reasons why the participant does not have any evidence, • the attempt to collect the required evidence • how you are satisfied with the reasons provided by the participant. <p>Emphasis is on proving the case for the exception, rather than on the strength of the self-declaration.</p>

Evidence of meeting essential criteria

Copies of documents proving participant’s eligibility must be of reasonable quality and text should be easily legible: a number of the records checked have poor quality images making it difficult to confirm eligibility of the participant and may lead to that participant’s record being rejected by the funder.

Eligibility criteria	Examples of supporting documents (not exhaustive)
<p>National Insurance Number</p>	<p>All participants are required to provide evidence of an NI number, which will be used as their Unique Reference Number by the funder.</p> <p>This might be on a letter from HMRC or DWP, an old pay slip, a benefits statement or a plastic card.</p> <p>In the case of a NEET young person aged 15 who does not have an NI number, please ask your project coordinator at the point of enrolment to get a reference number issued by Big Lottery. This</p>

	<p>should be used in place of the NI number on all paperwork relating to the participant, and should not be changed when they do get an NI number issued.</p>
<p>Employment status: unemployed or economically inactive</p>	<p>Only one item of evidence is required to prove employment status</p> <p>Tier 1 evidence:</p> <ul style="list-style-type: none"> • DWP/Jobcentre Plus benefits decision notification letter – new claims award / decision or change of circumstances decision letter, dated within the last 12 months. <i>This could include a Working Tax Credit letter, which confirms the number of hours everyone in the household is working.</i> Please copy and certify ALL pages of this letter: if the participant has only kept the front page, please note this on their enrolment form to explain why there is only a partial letter being used as evidence. • If the letter is dated more than 3 months ago (for example, some ESA claimants may only get an annual confirmation of benefits) please support this with additional tier 2 evidence and complete the part of the enrolment form that asks about alternative credible evidence for employment status. • Written confirmation / referral from DWP/Jobcentre Plus or a referral from Careers Service, Probation Service or similar. Where possible, these letters should have a ‘wet’ signature. • ESF will not accept a Universal Credit benefits notification letter alone: this should be supported either by a letter from JCP or another agency offering support to the individual (tier 2 evidence) or complete the relevant box on the enrolment form re risk based exceptions (this replaces the old self declaration). <p>Tier 2 evidence:</p> <ul style="list-style-type: none"> • Where an individual is not engaged with DWP/Jobcentre Plus: <ul style="list-style-type: none"> • Written confirmation from a relevant third party that has been assisting the individual and so has an understanding of their current circumstances (<i>for example a voluntary organisation, charity, third sector/ not for profit organisation such as Childrens Centres or CAB, social services or other professional providing support and guidance etc., such as a doctor, teacher, religious leader or probation worker</i>). • Third parties must be independent of the BBO project management and delivery partners. <i>In rare instances it has only been possible to get evidence from within the partnership, for example from a college for a young person who is NEET. In such cases, please contact the</i>

	<p><i>project management team who will liaise with the funder to get approval.</i></p> <ul style="list-style-type: none"> As an alternative to written confirmation, sight of original case notes and support records are acceptable. Photocopies must be suitably redacted to protect sensitive personal data (<i>if photocopies are inappropriate or not permitted, a written agreement that funders' auditors can access the original records on request</i>).
<p>Legal right to live in the UK during the period of ESF support</p> <p>The legal right to work in an EU member state.</p>	<p>Only one item of evidence is required to prove legal right to live and work in the UK</p> <p>Tier 1 evidence:</p> <ul style="list-style-type: none"> Full passport (UK, EU Member state or Switzerland), national identity card (EU Member State or Switzerland) or registration certificate/ document certifying permanent residence (EU Member State or Switzerland). The passport can be expired. Full passport (not EU Member State): <ul style="list-style-type: none"> Passport either endorsed 'indefinite leave to remain – proceed (settled status) or includes work or residency permits or visa stamps (unexpired) and all related conditions met. The passport cannot be expired. Some non-EEA nationals have an Identity Card issued by the Home Office in place of a visa, confirming the individual's right to stay , work or study in the UK – these cards are acceptable Letter from the UK Immigration and Nationality Directorate granting indefinite leave to remain (settled status) Birth / adoption certificate (UK or EU Member State) AND a letter with their full name and NI number on it, from a government agency or previous employer. NB - the funder WILL now accept short form birth certificates. Residency permits for foreign nationals (usually in a passport) or endorsement in passport showing that the holder is exempt from immigration control and has the right to stay indefinitely in the UK CURRENT Immigration Status Document issued by the Home Office indicating that the holder has the right to stay indefinitely in the UK AND a document with their full name

	<p>and NI number on it, from a government agency or previous employer</p> <ul style="list-style-type: none"> • CURRENT Biometric Immigration Document issued by the Home Office indicating that the holder has the right to stay indefinitely in the UK <p>There is no longer any distinction between tier 1 and tier 2 evidence for this requirement: ALL participants have to provide one of these pieces of evidence.</p>
<p>At risk of becoming NEET.</p> <p>This applies to young people aged 16-29 if NEET and 15-18 if at risk of becoming NEET</p>	<p>Only one item of evidence is required to prove NEET status</p> <p>Referral letter from school or college and, if possible, an additional confirmation letter from the local authority confirming that the individual is at risk of becoming NEET.</p> <p>If a young person is already NEET and unable to get a letter from their school or college, you may be able to get a letter (as per Tier 2 evidence of employment status) from another organisation or professional who has worked with the individual and understands their circumstances. <i>This could include, for example: Talentmatch, Princes Trust, Childrens Centre, the Foyer, P3 etc.</i></p>
<p>Age of participant</p> <p>(There is no upper age limit as long as the participant is seeking work: the minimum age limit depends on NEET status: please see above)</p>	<p>Only one item of evidence is required to prove age <i>this will usually be included on evidence of right to live and work in the UK</i></p> <ul style="list-style-type: none"> • Birth certificate (a short birth certificate is now acceptable) • Full driving licence (please note that a driving licence cannot be used as evidence of anything other than DOB, and as such has little value as a piece of evidence) • Full passport • National Identity Card (EU) • Firearms certificate / Shotgun licence • Northern Ireland voters card • Pension statement (if date of birth is quoted) • Evidence of being in receipt of age-related state benefits • Letter/ confirmation from educational institution (if applicable)

For participants who lack evidence of not being in paid work, but who ARE JSA claimants, one way of proving this is to get a customer statement from DWP. This is not something that the Job Centre would provide, but can be obtained by ringing the Service Centre:

Telephone: 0345 600 0723

Textphone: 0345 600 0743

Monday to Friday, 8am to 6pm

Alternatively, participants may have a phone number on their most recent benefits letter that they should call for this sort of query.

This statement would include the amount of benefit being paid: if the person was in receipt of wages of over 5 pounds per week, their benefit would be reduced accordingly. This isn't an exact science, as the amount people get depends on their age, savings etc., but as a guide the maximum JSA payments are (correct at April 2017):

AGE	JSA WEEKLY AMOUNT
18 to 24	up to £57.90
25 or over	up to £73.10
Couples (both aged over 18)	up to £114.85

So, if the participant has received the maximum payment in the last couple of weeks or so (the statement would need to be as up to date as possible) we can be fairly sure that they're not in paid employment - probably as sure as we can be if the Jobcentre won't provide any evidence for us, and this would make up part of the narrative to the funder that would explain to them why this is the best evidence we're able to provide for that individual. Unfortunately this doesn't work for Universal Credit or ESA claimants, as the amount paid is much more variable. It's not a perfect solution, but it may be the best we can provide without creating additional barriers for participants.

If the JSA payment has been reduced but the participant says they are not in paid employment, it is worth asking what the reduction relates to as some people may have deductions relating to, for example, court fines or the social fund made from their JSA.

ESA (and some other benefits) claimants can work up to 16 hours or earn up to 115 pounds per week ('permitted work') before it affects their benefits. If you have evidence of benefits which does not conclusively prove employment status, we would suggest supporting this with a self declaration form.

Obtaining Tier 1 or Tier 2 Evidence

If a participant has no way of providing tier 1 or 2 evidence, there are some steps we can take to help them. Remember that the emphasis is on us to help them obtain this evidence, not on them to incur expense or inconvenience.

National Insurance Number: You can find your National Insurance number on your payslip, P60, or letters about tax, pensions and benefits.

If a participant is unable to provide any of these, you can go online and either:

- fill in form CA5403 and send it to the address on the form *or*
- phone the National Insurance numbers helpline and answer some questions (you'll need to fill in form CA5403 if you can't answer the questions). Please bear in mind that HMRC

will need to speak to the participant, and not you as their advisor. Some participants may prefer to be sat with you when they ring, though, for reassurance.

HM Revenue and Customs (HMRC) won't tell you your National Insurance number over the phone - they'll post it to the participant.

For more information go to: <https://www.gov.uk/lost-national-insurance-number>

Full UK birth/ adoption certificate: copies can be ordered online for £9.25. This is an **eligible cost** for the project, and can be attributed to the 'participant expenses' line of your budget. You can register as a representative of an organisation for ordering certificates online, so that the participant does not have to meet the upfront expense.

Although the funder will now accept short form birth certificates, we are still happy to pay for a long birth certificate for participants as this may be required in the future by employers.

You may need the participant sat with you as you complete the online form, to get their full details. For example, for a birth certificate you will need to know:

Surname at birth
Forename(s)
Date of birth (dd/mm/yyyy)
Place of birth
Father's/Parent's surname
Father's/Parent's forename(s)
Mother's maiden surname
Mother's surname at time of the birth
Mother's forename(s)

For more information or to order a certificate, go to: <https://www.gov.uk/order-copy-birth-death-marriage-certificate>

Due to the higher costs involved, we should **not** be funding passport applications as evidence.

Doctor's letters: if a participant can only supply a letter from their GP as tier 2 evidence to confirm their employment status, there will probably be a charge for this service by the surgery. This would be an **eligible cost** if a receipt is provided.

Evidence of characteristics

There is no need to obtain evidence of the following participant characteristics:

- Disabilities, medical records / opinions, work-limiting health conditions, substance misuse;
- Gender identity / sex;
- Ethnicity / racial origin;
- Religion or belief;
- Identifies as part of a minority or marginalised community;

- Participant is an ex-offender;
- Homelessness;
- Records relating to other people, for example, children, dependents, caring responsibilities or whether

Questions are asked on the enrolment form about these characteristics, which participants can decline to answer without it affecting their eligibility.

Certifying and keeping copies of evidence

Where possible, original copies of evidence should be kept, but this will often not be possible. In that case, you can certify a copy. The person certifying the copy will need both the photocopied document and the original in front of them (so they will need the beneficiary to meet them somewhere where they can make a hard copy of a document) and certify the copy by:

- writing 'I certify that this is a true copy of the original document' on the copy
- signing and dating it
- printing their name under the signature
- adding their job title and organisation they work for

Partners might find it easiest to buy a stamp containing all of the key information.

Copies should then be scanned and attached to the participant's Aptem record. Hard copies should be securely stored in line with data protection requirements.

Electronic signatures

Please note that electronic signatures **cannot** be used on this project.

Start date

The participant's start date is the date on which they first take part in learning activities.

It is probable that there will be some pre-work with participants before they enrol (on average it seems to take about 4 meetings to get eligibility evidence, fill in forms etc). These meetings should not be detailed on Annexe I, and nor do they count as a start date.

The day they complete and sign the enrolment form is not the start date, either, UNLESS on the same day you do some other work with them. Induction and needs assessment don't count as 'learning activities'. However, doing something like an Aptem skills assessment questionnaire probably would. **The funder's guidance has changed on this point over the course of the project.** The activities in part A must clearly contribute to the goals detailed in part B of Annexe I: together, they should form a coherent picture of the participant's journey, supported by evidence of those activities. Simply saying 'job search' or 'job club' in part A, for example, does not make any link to the individual's goals.

All participants should have an initial needs assessment done, **which should be signed and dated by the participant** (omission of this signature could result in a funder's file audit fail). The format of this assessment is entirely up to you, but there are plenty of examples available online or contact your lead/ other partners for examples.

Exit date

If a participant disengages from the project and, despite your best efforts, does not get in touch for two or three months – as you deem appropriate to their personal situation – you can exit them without an outcome (see the How To sheet). We understand that in these circumstances you won't be able to get a signed exit form, and thus no outcome can be claimed for them (even if they've achieved an outcome, without the form we cannot claim it). If they decide to re-engage in the future, we can reactivate their APTEM account, but you would have to go through the enrolment form to check everything is still current and likewise recheck their eligibility evidence.

It is expected that most participants will progress on a journey during their time on the project, completing training, job searching, maybe even some temporary or part time work. However, these are seen as activities rather than outcomes: we can only claim an outcome if we exit the participant within 4 weeks of them starting the job or learning that we wish to claim.

The key point to note is that participants must be exited with a signed Annexe J dated within 4 weeks of the start date of their learning or job outcome. After exit, it is fine to keep in touch – we will pay for your time to do this - but we cannot fund any expenses for the participant, so ensure that they have everything they need (e.g. work clothes, rail pass etc) before exit.

For example: a participant enrolls on a course on 1st September, they may keep coming in to see you for help with making the adjustment to studying and to make sure they have a plan in place for what they hope to do after their course is complete. In order to claim their outcome of going into learning or education, you have 4 weeks from 1st September to get a signed Annexe J.

Claimable outcomes

Progression from the project, in order to count against our targets, must be into one or more of the following:

Labour market:

- Into paid employment
- Into self-employment

Job search

- Into job-search (actively seeking work). This is **only** a progression for people who were **economically inactive** when they joined the project.

Education/ training:

- Into non-accredited training
- Gaining a qualification

Please note that this **cannot be training paid for by BBO** in order to be counted as an outcome. It does not have to be an accredited qualification, but should be more than a single day (for example, First Aid at Work or a one day course would not count) and should link to the individual's goals.

Volunteering is not itself a progression, but in many cases would contribute to the project's 'softer' outcomes, such as improved self-confidence and increased social networks, as well as providing opportunities to develop transferable skills, gain references etc. The project does have targets attached to these outcomes that need to be reported on quarterly by the project management team, and this is largely done through the participant questionnaires that are completed at the start, end and interim of engagement. It is therefore **extremely important that these questionnaires are completed by all participants** and that they are scanned in and attached to participant files on APTM.

From 25 May 2018, there is no longer a requirement to evidence outcomes, as the project is not paid on a results basis. In order to claim an outcome, you will still need a completed Annexe J (exit form)

Please remember that this is a summary of a number of more detailed documents. For further information, please see:

- Home Office document 'An employers guide to right to work checks' available on the gov.com website
- ESF Programme for England 2014-2020 National Eligibility Rules
- ESF Data Evidence Requirements – Eligibility and Results
- Annexe M: participant definitions and data fields v7

Storage of evidence

All documentation associated with the project must be retained by partner organisations for a number of years after the final grant payment has been made. Previously we had been advised that this period would be ten years: since then, ESF have clarified that it is uncertain how long this will be: it could be more or less than ten years, but partners are advised to use this as a rough guide to how long paperwork should be retained. The advice from DWP is to check with them before destroying any paperwork. Projects may be audited at any time up to the point at which we are authorised to destroy documents associated with the project. Any evidence which is ineligible, missing or incomplete may result in payments being frozen or clawback by the funders, as detailed in the Partnership Agreement.

Data Protection

- Only authorised staff involved in the project should have access to or be able to edit or destroy participant data
- All data should be stored in compliance with GDPR and funders' requirements
- Records should be frequently backed up in order to mitigate the risk of loss or destruction of evidence
- If using mobile devices such as camera phones to copy evidence, partners are responsible for the secure storage and transfer of data. This may be audited.

- It is the partner's responsibility to ensure that participant data is handled in line with GDPR and that their provision adheres to the partnership-wide Data Protection policy.

Participant records

In order to be able to claim for participants each person should, over the course of their involvement in the project, have a full set of forms signed by both their BBO Advisor and the participant:

- Participant entry form (Annexe H)
- Participant progress form (Annexe I)
- Participant expenses, allowances and incentives form (Annexe N)
- Participant exit form (Annexe J)

All of these must be supported by the appropriate evidence and, when it has been signed (electronic signatures are not permitted), scanned and attached to the participant's APTEM file.

Evidence of activity may include:

- Sign-in sheets
- Course offer letters
- Certificates
- Emails
- Pages from a workbook or other examples of work completed
- CVs
- Job applications
- Invitations to interviews/ job offers
- Information such as handouts or slides from courses attended
- Photos

Additionally, it is a condition of funding that partners are able to demonstrate participants' progression towards the project's softer outcomes. This is measured using the Participant Surveys, measuring distance travelled. There are two forms: one to be completed at enrolment **and** another at exit. Those participants that you anticipate being with the project for several months should also repeat the enrolment questionnaire as part of a mid-term review of progress. **Failure to complete these questionnaires could lead to clawback.**

Enrolling participants on My Work Search

There are 'how to' sheets available on the partner website detailing how to complete each step of the participant paperwork and correspondingly what needs to be done on APTEM. Please refer to these for guidance. There is also an example file provided by the funder. The forms included in this are not the most recent versions, but it remains a useful piece of guidance regarding what is expected to be included in a file.

A participant will not be regarded as enrolled, for reporting purposes, until all of their information and supporting copies of eligibility evidence has been entered onto APTEM. **Do not enter a**

participant onto APTEM until all of their paperwork is complete and you are able to scan in certified copies of eligibility evidence.

Common errors in enrolments include:

- Failing to complete all questions on the hard copy enrolment form. Please ensure that EVERY question is answered, even if the answer is 'no' or 'prefer not to say'.
- Not scanning and uploading signed, dated forms to the Documents section of each participant's record on APTEM.
- Not filling all of the fields in during electronic enrolment, OR not answering all questions on APTEM when transferring information from a hard copy enrolment form.
- Not certifying that eligibility evidence is a true copy of the original.
- Incomplete or inadmissible evidence of eligibility.
- Not adding the participant reference (starting G/Linc...) to the hard copy files before uploading.
- Not recording how long (in months) the participant has been out of work.
- The participant's date of birth.
- Not completing a participant questionnaire

All reports are run from APTEM: a participant record that is incomplete will not count against a partner's participant targets and could thus lead to payments being withheld if it appears that a partner is underperforming.

It is helpful if partners use the Notes section of the participant file on APTEM to record any narrative surrounding the evidence that has been uploaded, such as meetings with the participant/ planned activity/ any problems encountered. This provides evaluators and auditors with a clear picture of what each partner is doing to support participants and can help to reduce questions at a later date. If there is evidence of a particularly sensitive nature on the participant's hard copy file, please just mention this in the Notes section: it is not necessary to go into detail on APTEM.

Participants are able to see the documents uploaded on the APTEM file but not the Notes section: however, please be mindful of the fact that any participant may request to see the notes made on their file at any point.

It is the responsibility of all partners to ensure that their participant data is correct and up to date.

What do I need to upload to APTEM on a participant's record?

The funder will ask for sample files at short notice, and will expect to see for all participants:

1. Signed, complete copies of:

Enrolment form

Annexe I Participant Progress Form (parts 1 and 2)

Expenses forms and certified receipts/ invoices (where applicable)

Exit form (where applicable)

2. **Certified copies of:**
 - Each piece of eligibility evidence
 - Invoices/ tickets/ receipts for Annexe N (expenses incurred)
 - Progression evidence (where applicable)

3. **Supporting evidence showing activity and supporting Annexe I's record of activity. This should include:**
 - Personal development plan
 - Initial needs assessment **signed by the participant**
 - Distance travelled evaluation questionnaires
 - Certificates
 - Screenshots of job searches
 - CVs
 - Sign-in sheets
 - Training materials/ slides
 - Photos of activities the participant has taken part in
 - Confirmation of a place on a course
 - Emails

4. **Evaluation questionnaires**

It is important that you cross-reference the documents uploaded (making sure dates correspond with what's on Annexe I etc.) and that copies are certified. Please ensure that all documents are uploaded by the end of each quarter. Incomplete files could result in clawback by the funder.

What is the funder looking for when they do a file audit?

Basically, accuracy and completeness! In addition to all of the documents listed above, they have identified a number of common errors across BBO, all of which apply to some BBO files:

- The start date recorded on the participant entry form is not supported by a record of activities to show the participant's first activity on the project occurred on the start date. The participant start date on the project is not necessarily the day the participant entry form is completed, it needs be the date the participant first took part in a project activity and there should be evidence on the participant file to show this activity has taken place.

- Care has not been taken when transferring information from participant documentation to information management systems (in the case of BBO, this is APTM), resulting in poor data quality and quarterly reports that do not match the documentation provided as evidence.

- Participant entry forms, exit forms and progress documentation are not fully completed, or have signatures missing.

- Participant files are being provided without needs assessments, action plans or records of activities in addition there are poor levels of detail in some that have been provided. Please ensure these records are provided for participant checks and there is sufficient detail to understand what activities have taken place and when.

Evidence and Eligibility FAQ

What if a participant has no permanent address?

You will need to consider this on a case by case basis. It may be that the participant has an official postal address that they use to get their mail or an address that they have permission to use for official purposes. If the participant does not have a residential address that they can use, then we would advise you to record their address as the address of where they are participating in the project (the delivery address). In order to be clear that the participant is of No Fixed Abode (NFA), the first line of the address should be recorded as 'NFA' and subsequent lines are recorded as a 'care of' address.

A participant has got a part time or temporary job, but hopes – with our support – to BBO towards full time, sustainable employment. Do I have to exit them from BBO?

As long as you are not intending to claim the part time or temporary job as an outcome, you could offer in-work support to the person with the aim of achieving a full time or permanent job result at the end of the support. If you want to claim the part time/ temporary job as a result then you would need to exit the participant within 4 weeks.

One of our participants has recently moved from Lincolnshire to Nottinghamshire but still wants to get support from us, as they will still be coming to Lincolnshire frequently to visit family members. Are we still able to support this participant, or do we have to exit them from BBO?

As the delivery partner that is supporting the participant is based in the Lincolnshire LEP area, then this should be fine. (See page five, section six of the Guide to European Funding – geographic eligibility). A point to note is that if the participant does end up enrolling with a Nottinghamshire based BBO project both BBO and that project would be able to claim results as you are based in different LEP areas.

I have a participant who has previously been on another BBO programme (or with another partner) in Lincolnshire but now want to join us: can I enrol them?

A participant can only have one BBO record per LEP area: if they move between projects or partners, their original start date with BBO (regardless of which project) remains the same. Any outcome from the previous project/ partner will be deleted from their record and that project/ partner will lose the result. The original partner will retain the output (i.e. can count that person towards their target number of enrolments) whereas the second partner will not be able to count an output; the second partner will, instead, claim the eventual outcome once they progress.

You will need to get the local reference number (e.g. G/Linc...) from the partner/ project that originally supported them as this number will stay with the participant on your project. Contact your project coordinator to sort out accessing their record on APTEM.

This is not to say that participants may not move between projects: if that is their preference, then we will support them. However, it can be complicated and this is why we need to ensure that as a partnership we are giving participants the best advice on which partner/ BBO project is most suited to their needs.

One of my participants has disengaged from the project, and I can't get hold of them to fill in the exit forms. What should I do?

Wherever possible we would like to see an exit form, however this isn't always possible. In effect, this would just mean that you can't claim an outcome for that participant. We would always expect to see an exit form when claiming a result. As long as the participant's record is otherwise complete and accurate, and you've got all of the relevant signatures on forms and evidence that they are eligible then all other documentation should be in place to claim costs.

What do I have to do on APTM to record that a participant has exited the programme?

You will need to upload an exit form and supporting evidence, if you are claiming an outcome for that participant, to the Documents section of APTM. You will then have to go into the participant's record, select 'Outcomes' and then 'Add'. There is a drop down menu in the box to create an outcome: when you created the outcome, click 'save'. Then stop the Programme. Unless this step is completed, the outcome will not appear on any reports. It is also possible to exit a participant without progression: see the 'How to' sheet on exiting.

Participant record checklist

The criteria below reflect the funder's requirements and feedback received from file audits. Please bear in mind that the funder may request copies of the complete file for any participant at any time, usually at very short notice. Please ensure that all documents are uploaded by the end of the quarter.

Unless all of the criteria are met, we will not be able to claim for an individual, and incomplete records may lead to clawback.

Enrolment/ exit	√
APTEM report: are all of the boxes filled for the individual when you run the participants' report from APTEM?	
Is every question on the enrolment form completed? If any changes have been made to the form, have they been initialled?	
Is the date of the participant's signature and the date of the BBO Advisor's signature the same?	
Annexe I: are both parts 1 and 2 filled in, with the participant's signatures? Does part 1 clearly demonstrate what activity is undertaken and how it contributes to the participant achieving their goals in part 2?	
Annexe I: is the first line of activity dated the same as the start date? (not necessarily the enrolment date)	
Is the enrolment date the same on all of the annexes AND has it been entered correctly on Aptem? (You can check this by running a report)	
Has the participant's unemployment status as unemployed or economically inactive been checked against the funder's definitions? (Economically inactive has been generally under-reported)	
Where applicable (either because they have progressed or disengaged), has the participant been exited on APTEM?	
If claiming an outcome, is the exit form completed fully and signed?	
Is the exit form dated within 4 weeks of the participant's start date in the activity which we are claiming as an outcome? Has the correct exit date been entered into Aptem?	
Eligibility evidence	√
Evidence to live and work in the UK: passport, permit or visa OR birth certificate AND evidence of national insurance number (nb – different rules apply to non-UK nationals: see guidance)	

<p>Evidence of worklessness:</p> <p>Tier 1: letter or referral form from JCP/ DWP including a statement about the person being ‘not currently in paid work’ (a benefits letter alone will rarely be sufficient, other than as supporting evidence/ evidence of NI number)</p> <p>OR</p> <p>Tier 2: referral form or letter from third party who has offered support to the person in a professional capacity, including a statement about the person being ‘not currently in paid work’</p> <p>OR</p> <p>Tier 3/ 4: partial evidence and self declaration form</p>	
For participants on other ESF programmes (most likely to be Work Programme), is there a letter from their Work Programme Advisor confirming that it is ok for them to be on both, and that they are satisfied that the support offered will be different?	
Is all evidence certified as a true copy? (signed, printed name, job title, organisation, date)	
Are all copies of evidence of good quality, and clearly legible?	
Documents that need to be uploaded onto APTM	√
Signed, dated enrolment form	
Certified eligibility evidence – right to live and work in the UK AND employment status. Evidence of NI number.	
Annexe I Participant progress form (parts 1 and 2)	
Annexe N Participant expenses claim forms and relevant certified receipts/ invoices	
Where applicable, Annexe J Participant exit form	
Where applicable, evidence of progression dated within 4 weeks of the exit date (and certified as a true copy). This is for exits prior to 25 May 2018	
Evidence of activity to support Annexe I (e.g. CVs, certificates for training or qualifications completed, sign-in sheets, personal development plans, notes from meetings, photographs, outcome stars etc.)	
Initial needs assessment signed by the participant (from Sept 2017)	
Evaluation ‘distance travelled’ questionnaires (start/ exit and midway if appropriate)	
Do document names clearly indicate what they are?	
Are duplicates of documents (e.g. unsigned enrolment forms) or unnecessary personal data (e.g. driving licence) deleted from the file?	
Is the Notes section used, giving context to uploaded documents/ filling any gaps?	

The funder has also compiled a list of what they expect to see in a participant file, and in what order:

NI number:		Customer Reference number:	
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Contents

Section A - Entry and eligibility

Participant entry form

Evidence of right to work

Evidence of employment status

Section B - Progress

Participant progress form

Evidence of needs analysis, development planning or progress reviews

Evidence of progress such as attendance sheets, course notes and submitted work

Section C - Expenses, incentives and allowances

Participant expenses, incentives and allowances form

Details and receipts

Section D - Exit and results

Participant exit form

Evidence of results