



VIEŠOSIOS POLITIKOS IR VADYBOS INSTITUTAS
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STUDY ON THE TRANSLATION OF ARTICLE 16 OF
REGULATION (EC) N°1083/2006 ON THE
PROMOTION OF GENDER EQUALITY, NON-
DISCRIMINATION AND ACCESSIBILITY FOR
DISABLED PERSONS, INTO COHESION POLICY
PROGRAMMES 2007-2013 CO-FINANCED BY THE
ERDF AND THE COHESION FUND

SELF-ASSESSMENT GUIDE

September 15, 2009

This report has been prepared by the Public Policy and Management Institute (PPMI, Lithuania), in partnership with Net Effect (Finland) and Racine (France) at the request of the European Commission. The views expressed are those of the Consultant and do not represent the official views of the European Commission.

Implementation of Article 16 of Regulation (EC) No. 1083/2006 across various policy stages in the cohesion policy programmes co-financed by the ERDF and the Cohesion Fund

What is the purpose of this Guide?

This Self-Assessment Guide has been prepared in order to assist authorities responsible for the preparation and management of cohesion policy programmes co-financed by the ERDF and the Cohesion Fund in reviewing their performance as regards the implementation of Article 16 of Regulation (EC) No. 1083/2006¹.

What exactly does Article 16 say?

Article 16 of General Regulation (EC) No. 1083/2006 calls for the integration of the themes of gender equality, non-discrimination and accessibility for the disabled during all stages of implementation of Structural Funds. It states:

"The Member States and the Commission shall ensure that equality between men and women and the integration of the gender perspective is promoted during the various stages of implementation of the Funds.

The Member States and the Commission shall take appropriate steps to prevent any discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation during the various stages of implementation of the Funds and, in particular, in the access to them. In particular, accessibility for disabled persons shall be one of the criteria to be observed in defining operations co-financed by the Funds and to be taken into account during the various stages of implementation".

Why self-assessment on Article 16 is important?

The principles of gender equality and (less explicitly) non-discrimination were mentioned in regulations of earlier programming periods. However, Article 16 stands out due to its broad scope, specific language, and 'a call for mainstreaming' (i.e. the three principles are to be pursued during *various stages of implementation of Funds*). As there are no common standards on how to integrate Article 16, a guide for systemic self-assessment is a useful tool for gap identification and programme improvement.

What terms to look for?

The three themes of gender equality, non-discrimination and accessibility for the disabled have many definitions, and may be approached in different ways. This is understandable given the wide variety of regional and national contexts where cohesion policy programmes (or Operational Programmes (OPs)) are implemented. The terms **equal opportunities**, **equality and diversity**, **horizontal priorities** and **cross-cutting themes** are often used when referring to the three themes. Any of these terms are appropriate when looking for the genuine rather than formal integration of Article 16². When conducting the self-assessment it is important to be explicit as to what is the exact meaning of the terms appearing in the documents under review (e.g. if the term of equal opportunities is used, does it refer to equal opportunities between men and women or opportunities for all groups experiencing discrimination?).

¹ Council Regulation (EC) No 1083/2006 of 11 July 2006 laying down general provisions on the European Regional Development Fund, the European Social Fund and the Cohesion Fund and repealing Regulation (EC) No. 1260/1999.

² In some cases the exact text of Article 16 may be quoted in cohesion policy documents; however this does not necessarily mean that this article has been implemented well. Meanwhile, a programme which does not make an explicit reference to Article 16 may still comprehensively integrate the three principles.

How was this Guide prepared and what sources were used?

This Guide was prepared as a part of the 'Study on the translation of Article 16 of Regulation (EC) N°1083/2006, on the promotion of gender equality, non-discrimination and accessibility for disabled persons, into cohesion policy programmes 2007-2013 co-financed by the ERDF and the Cohesion fund' carried out in 2009. It is based on an analysis of various EU and national policy documents, a review of 50 Operational Programmes and 15 case studies in different Member States.

How could the results of self-assessment be used?

There is no standard set of practices used for the integration and implementation of Article 16. Though this article creates a legal obligation for Member States, they are encouraged to take the *appropriate steps*, meaning they should pursue the obligations stemming from Article 16 in accordance with their national law. Thus a variety of practices are possible and indeed desirable: there is no definite list of appropriate actions. Integration of the principles of gender equality, non-discrimination and accessibility is an evolving field and in the future some new and interesting practices will be developed.

The Guide may be useful for a number of reasons:

- It allows for the **systemic analysis of a programme across various policy stages**. Currently, many OPs are encountering a problem concerning consistency. For example, the equality aspect is taken into consideration during the project selection phase, but there are no relevant practices during the stages of programme management, reporting or publicity.
- The Guide also provides a **pool of ideas** for the improvement of the programme implementation process through the integration of Article 16. These ideas could be drawn from the Guide structure and questions. This is not to imply that all the practices referred to in the questions should be followed. The Guide presents a range of options, while the relevant authorities should pursue the options which are useful, based upon their national needs and contexts.

What is the structure of this Guide?

With the focus of Article 16 on **mainstreaming**, a questionnaire was designed to check if there are relevant practices at **all stages** of programme implementation. Each section of the guide gives an overview of the most frequently-used practices at each particular stage. In addition, a guiding comment is provided to help the users of this guide to understand and use the results of their answers.

Integration of the themes of gender equality, non-discrimination and accessibility for the disabled

Article 16 calls for the integration of the gender perspective, the prevention of discrimination on the grounds of sex, race and ethnic origin, religion and belief, age, disability and sexual orientation, and also the ensuring of accessibility for disabled persons. If you have a practice that is referred to in the questions below, and if your practice concerns either of the aforementioned groups or situations, then tick 'yes' as your answer. The same applies when your practice is devoted not to one particular group, but aims to promote equal opportunities, equality, diversity, etc.

However, there are cases when a Member State has practices devoted to one of these groups, but the needs of other groups that are relevant to the national context are not considered during the implementation of cohesion policy programmes. For example, many Member States integrate and implement the gender aspect, but give little attention to such groups as the disabled, immigrants, and older persons. Thus before going through the Guide you may want first to identify all the groups that the Operational Programme will have the strongest impact on. Separate questionnaires could be filled in for each of these groups and then be compared to see if all these groups receive enough attention during the implementation of the Structural Funds.

SELF-ASSESSMENT GUIDE

NO.	GUIDING QUESTION	ASSESSMENT	
1.	Project selection		
<p>The consistent integration of Article 16 into the project selection process will ensure that applicants consider the principles of gender equality, non-discrimination and accessibility while preparing their projects. Take a look at the practices implied by questions 1.1-1.8. Questions 1.1-1.4 suggest the most frequently-used strategies for integrating cross-cutting issues (from the minimal 'no adverse effects' to special calls for proposals). Meanwhile, questions 1.5-1.8 list tools that can be used to support any approach and to better integrate equality issues into project applications.</p>			
What approach is used to integrate the themes of gender equality/ non-discrimination/ accessibility into the project selection process?			
1.1.	In order to be supported projects should not demonstrate obvious adverse (or discriminatory) effects for groups mentioned in Article 16	Yes <input type="checkbox"/>	No <input type="checkbox"/>
1.2.	All projects have to comply with some standards which are relevant from the perspective of Article 16	Yes <input type="checkbox"/>	No <input type="checkbox"/>
1.3.	Projects targeting the themes of gender equality/ non-discrimination, or accessibility have an advantage to a certain degree when a decision on support is taken (e.g. may get a higher score)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
1.4.	There are calls for proposals (or non-competitive selection procedure is applied) devoted specifically to projects addressing one of the themes of Article 16	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<p>There are two broad strategies for project selection: targeting when funding is allocated specifically to equality projects, and mainstreaming when all projects have to take equal opportunities into account (these strategies are not mutually exclusive). If you answered 'yes' to questions 1.4 or 1.3, you are using the targeting approach. However, if the practice referred to in question 1.3 is used, it is 'weak' targeting since the equality criteria do not have a determining influence on the selection decision. Nevertheless, this practice is useful because it makes all stakeholders to consider the aspect of equal opportunities.</p> <p>While the targeting strategy is beneficial in channelling support to relevant projects, mainstreaming is important because the projects that do not aim directly to promote equal opportunities may still have a far-reaching impact on equality. Thus, if you answered 'no' to the mainstreaming questions (1.1 or 1.2), you should reflect on how to improve the project selection process so that all applicants are encouraged to integrate the principles of gender equality, non-discrimination, and accessibility into their projects.</p>			
<p>What tools are used to integrate the themes of gender equality/ non-discrimination/ accessibility into the project selection process?</p>			
1.5.	Project applicants must explain the contribution of their projects regarding equal opportunities	Yes <input type="checkbox"/>	No <input type="checkbox"/>
1.6.	Project applicants have to carry out a systemic Impact Assessment	Yes <input type="checkbox"/>	No <input type="checkbox"/>
1.7.	Guidelines, advice, consultation or training on cross-cutting issues are available to applicants	Yes <input type="checkbox"/>	No <input type="checkbox"/>
1.8.	Guidelines, advice, consultation or training on cross-cutting issues are available to project evaluators/ appraisers or public agencies in charge of the OP	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<p>There is a risk of implementing the strategies of mainstreaming and targeting only formally. This means that even if the relevant selection practices are used, they do not make any difference in terms of the actual quality and choice of projects. Therefore, it is important to use tools that help applicants present their intentions in an explicit and structured way (questions 1.5-1.7). Furthermore, it is advisable to provide support to programme authorities and project evaluators in order that they can make a distinction between projects that integrate the</p>			

equality aspect well, and the ones that are less successful in this respect (question 1.8). If your answer to questions 1.5-1.8 is 'no', please consider the tools you could introduce to provide support to programme authorities and project evaluators.

2. Programme management					
<p>Ideally programme authorities should take Article 16 into account so that the needs of groups referred to in this article are given due consideration during the process of managing the programme. The Member States used various practices for this purpose, and they are listed in questions 2.1-2.12. Among these practices, there are special institutional arrangements, contractual obligations and control measures, guidelines, advice and solutions for the exchange of experience.</p>					
<p>Are there any institutional arrangements set in order to accommodate the themes of gender equality/ non-discrimination/ accessibility into programme management?</p>					
2.1.	<p>An official in the Managing Authority, intermediate or implementing body has been assigned a responsibility for co-ordinating/ facilitating the implementation of any of the three themes</p>				
	<table border="0"> <tr> <td style="padding-right: 20px;">Yes</td> <td>No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input type="checkbox"/>				
2.2.	<p>The obligation to uphold any of the three themes and to monitor their progress is included in inter-institutional contracts (which define responsibilities of various institutions in programme management)</p>				
	<table border="0"> <tr> <td style="padding-right: 20px;">Yes</td> <td>No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input type="checkbox"/>				
2.3.	<p>A special institutional body is created to discuss progress in implementing the cross-cutting issues and provide advice to public bodies involved into the implementation of OP</p>				
	<table border="0"> <tr> <td style="padding-right: 20px;">Yes</td> <td>No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input type="checkbox"/>				
2.4.	<p>There is a rule or practice aimed to ensure gender balance in any of the management or implementing bodies (including the Programme Monitoring Committee)</p>				
	<table border="0"> <tr> <td style="padding-right: 20px;">Yes</td> <td>No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input type="checkbox"/>				
<p>Are there any contractual obligations and control measures that help to integrate the themes of gender equality/ non-discrimination/ accessibility into programme management?</p>					
2.5.	<p>Equality commitments undertaken by the beneficiaries become an obligation under the contract that awards support</p>				
	<table border="0"> <tr> <td style="padding-right: 20px;">Yes</td> <td>No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input type="checkbox"/>				
2.6.	<p>The project contractors and/or sub-contractors are required to take equality into consideration</p>				
	<table border="0"> <tr> <td style="padding-right: 20px;">Yes</td> <td>No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input type="checkbox"/>				
2.7.	<p>There are measures aimed to control the applicants'/ managers'/ beneficiaries' compliance with the principles of Article 16</p>				
	<table border="0"> <tr> <td style="padding-right: 20px;">Yes</td> <td>No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input type="checkbox"/>				
<p>Practices used by Member States to integrate principles such as gender equality into programme management can be either obligatory or voluntary. Obligatory norms put a formal requirement on programme authorities or beneficiaries to discuss equality issues or to implement certain actions (e.g., create a working group, include a clause on equality in contracts, etc.). If you answered 'no' to most of questions 2.1-2.7, then you use few obligatory arrangements during the programme implementation. You should consider introducing such arrangements, which are useful as they call for everyone to take action, and imply that some control measures are being or may be undertaken to monitor compliance.</p>					
<p>Is there any assistance available on the themes of gender equality/ non-discrimination/ accessibility during programme management?</p>					
2.8.	<p>Guidelines, advice, consultation or training on cross-cutting issues for project beneficiaries (direct or final), project managers or contractors</p>				
	<table border="0"> <tr> <td style="padding-right: 20px;">Yes</td> <td>No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input type="checkbox"/>				
2.9.	<p>Guidelines, advice, consultation or training on cross-cutting issues for the employees of public agencies and institutions in charge of the OP</p>				
	<table border="0"> <tr> <td style="padding-right: 20px;">Yes</td> <td>No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input type="checkbox"/>				

Are there any arrangements that help to strive for synergies and encourage institutional learning as concerns the implementation of the three themes?		
2.10.	The project beneficiaries are encouraged to publicise their results (i.e. those concerning cross-cutting issues) and share experiences and good practices	Yes <input type="checkbox"/> No <input type="checkbox"/>
2.11.	Programme authorities are encouraged to exchange information	Yes <input type="checkbox"/> No <input type="checkbox"/>
2.12.	ERDF and ESF-funded activities are co-ordinated in order to ensure the better integration of cross-cutting issues	Yes <input type="checkbox"/> No <input type="checkbox"/>

There is a risk that obligatory requirements will be taken into account only formally and will not have any influence on the quality of programme management. Therefore, various voluntary or 'soft' practices are very important in providing assistance and advice to relevant institutions and organisations. The most frequently-used practices are indicated in questions 2.8-2.12. If you answered 'no' to most of these questions, you have few 'soft' practices. In this case, consider what practices among these could be the most effective in your particular context.

3. Reporting and monitoring (including indicators and targets)		
The reporting and monitoring process should be fine-tuned to reveal the progress in fulfilling the obligations of Article 16. To this purpose, the Member States use the practices referred to in questions 3.1-3.3. Meanwhile, the system of reporting and monitoring relies on a set of indicators and targets that should be designed to measure the contribution of the programme concerning equality (questions 3.4.-3.9).		
What tools have been chosen for reporting and monitoring the OPs achievements in terms of the themes of gender equality/ non-discrimination/ accessibility?		
3.1.	All projects have to report on how they address these themes in their progress and final reports	Yes <input type="checkbox"/> No <input type="checkbox"/>
3.2.	Programme Annual Implementation Reports include sections on at least one of the three themes	Yes <input type="checkbox"/> No <input type="checkbox"/>
3.3.	Monitoring data on either of the three themes is discussed in the Programme Monitoring Committee	Yes <input type="checkbox"/> No <input type="checkbox"/>
The three practices most frequently found at this stage are interconnected (3.1-3.3). To make sure that the information on project activities is available, there must be an arrangement for individual projects to regularly provide information on equal opportunities in their reports (3.1.). Project data then has to be aggregated at the programme level and included in Annual Implementation Reports (3.2.). To make full use of this information and act upon it, it has to be discussed in the Programme Monitoring Committee (3.3.). Based on the data provided, the committee could suggest changes in programme implementation that may have an influence on how projects integrate the requirements of Article 16. Thus, if you ticked 'no' for either of the practices mentioned in questions 3.1-3.3, then an important link in your monitoring system is missing. Please consider ways to introduce this link.		
Questions 3.4-3.7 list different types of indicators that could be used for monitoring purposes. Output indicators concern the number (or value) of projects supported; they can also measure activities of financed projects in terms of physical or monetary units (for example, the length of roads constructed, or the number of firms financially supported). Result indicators relate to the direct and immediate effect on direct beneficiaries brought about by the programme. Impact indicators refer to the consequences of the programme beyond its immediate effects (e.g. occurring after a certain period of time or affecting a wider population). Finally, context indicators provide general information when an OP may have only an indirect and long-term effect on the socio-economic situation ³ .		

³ European Commission, Directorate-General Regional Policy (2006), *The New Programming Period 2007-2013. Indicative Guidelines on Evaluation Methods: Monitoring and Evaluation Indicators*. Working Document No. 2.

What indicators and/or targets integrating the themes of gender equality, non-discrimination and accessibility are set for OP implementation?		Yes	No
3.4.	There are relevant output-level indicators	<input type="checkbox"/>	<input type="checkbox"/>
3.5.	There are relevant result-level indicators	<input type="checkbox"/>	<input type="checkbox"/>
3.6.	There are relevant impact-level indicators	<input type="checkbox"/>	<input type="checkbox"/>
3.7.	There are relevant context indicators	<input type="checkbox"/>	<input type="checkbox"/>
3.8.	There are quantified targets in relation to the groups mentioned in Article 16 set for at least one level of the indicators	<input type="checkbox"/>	<input type="checkbox"/>

Ideally, all programmes should have indicators at all the levels listed in questions 3.4-3.7. This would make it easier both to assess the overall situation with regard to gender equality, non-discrimination and accessibility as well as to understand the contribution of the Operational Programme. Quantified targets (question 3.8) are very useful in the evaluation of programme's activities. Therefore if you answer is 'no' to either of the questions from 3.4 to 3.8, this means that there are gaps in your monitoring system as regards the aspect of equality. Please consider practices that could be useful in addressing these gaps.

4. Evaluation		Yes	No
It is important to evaluate the achievements of Operational Programmes on equality issues in order to better understand both the overall progress as well as the main factors facilitating (or hindering) the genuine integration of Article 16. The relevant practices range from an evaluation at the very beginning of the programme cycle, to a reflection on the achievements after the programme is completed (questions 4.1-4.4).			
What approach to providing information on the themes of gender equality, / non-discrimination / accessibility is used in evaluation reports ?		Yes	No
4.1.	The OP's contribution to one or several of these themes was assessed in the ex-ante evaluation report	<input type="checkbox"/>	<input type="checkbox"/>
4.2.	The OP's contribution to one or several of these themes has been (or will be) assessed in thematic evaluation report(s) devoted specifically to cross-cutting issues	<input type="checkbox"/>	<input type="checkbox"/>
4.3.	The OP's contribution to one or several of these themes has been (or will be) assessed at the OP-level or sectoral evaluation reports	<input type="checkbox"/>	<input type="checkbox"/>
4.4.	The OP's contribution to one or several of these themes will be assessed in an ex-post evaluation report	<input type="checkbox"/>	<input type="checkbox"/>
If you answered mostly 'no' to questions 4.1-4.4, you should reconsider your evaluation practices and focus more attention on equality issues. It is useful to have an evaluation assessing the strategic choices (ex-ante) as well as reflecting on the achievements (ex-post) (questions 4.1 and 4.4 respectively). Research shows that Member States improved both their strategies from the perspective of equality and introduced some useful implementation measures as the result of recommendations provided in ex-ante evaluation reports. Meanwhile, ongoing evaluations are helpful in discussing progress while a programme is being implemented and suggesting changes that may be introduced in order to improve performance (the questions 4.2 and 4.3).			

5. Communication, information, and publicity

Information initiatives can be used to reach out to the groups mentioned in Article 16 in order to inform them about the opportunities provided by the OP, as well as to provide advice and guidance to them. Many Member States do not use any special information measures and take the position that general measures targeting the society as a whole are sufficient. Yet other states find that special initiatives are useful in sensitising the groups that are more difficult to reach through the usual information channels. The most frequent practices are listed in questions 5.1-5.4.

What approach to information and publicity is used in promoting the themes of gender equality/ non-discrimination/ accessibility?		Yes	No
5.1.	The groups mentioned in Article 16 are among the target groups of communication and publicity activities of the OP	<input type="checkbox"/>	<input type="checkbox"/>
5.2.	There are special measures to publicise the impact of the OP on the disadvantaged groups	<input type="checkbox"/>	<input type="checkbox"/>
5.3.	There is public body(-ies), NGO(s) or network(s) which is/are active in the areas relevant from the perspective of Article 16 and provide(s) a competent and trustworthy information on the operations of the OP	<input type="checkbox"/>	<input type="checkbox"/>
5.4.	The official information on the OP is accessible to the disabled (official web-sites on EU Funds and the OP has a mode for the disabled)	<input type="checkbox"/>	<input type="checkbox"/>

If you answered 'no' to most of the questions 5.1-5.4, please consider whether your current information practices are sufficient to encourage the participation of the groups listed in Article 16. It is not necessary to implement all the practices mentioned in questions 5.1-5.3; you could choose one of them taking your national context into consideration. The practice mentioned in question 5.4 is often required by the national law. If this is not the case, it is strongly advisable to implement it.

6. Partnership

Partnership is important as it allows to draw on the experience and expertise of various groups in designing and implementing the Operational Programme. A well-developed partnership means that all the relevant interests are included and have a voice during various stages of implementation. The partnership practices that Member States use the most frequently are indicated in questions 6.1-6.3 and they range from the stage of programme design to monitoring.

What mechanisms are used in order to involve social partners dealing with the issues of gender equality / non-discrimination / accessibility?		Yes	No
6.1.	Partners were consulted during the OP drafting process	<input type="checkbox"/>	<input type="checkbox"/>
6.2.	Partners are represented in the body, which selects, recommends or approves projects for funding	<input type="checkbox"/>	<input type="checkbox"/>
6.3.	Representatives of partner organisations are members of Monitoring, Steering or Evaluation Committee	<input type="checkbox"/>	<input type="checkbox"/>

General Regulation No. 1083/2006 requires that partner organisations should be involved in the preparation, monitoring and evaluation of Operational Programmes. However, even if this is the case in your programme, it may still turn out that none of these organisations work in the fields of gender equality, non-discrimination or accessibility. Also, even if your answer to questions 6.1-6.3 is 'yes', please consider whether all the groups that are important in your national context and are affected by the Operational Programme are included. The practice mentioned in question 6.2 is not very frequent, but some Member States find it useful.