



Study supporting the monitoring of FEAD – data collection systems implemented by Member States

Final report

Written by PPMi
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PPMi

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Table of Contents

Glossary	6
List of abbreviations	8
Executive summary	9
Zusammenfassung	13
Résumé analytique	18
Introduction	23
1. Methodological approach	26
2. Data collection systems for FEAD OP I type programmes	28
2.1. Comprehensiveness and proportionality of data collection systems	28
2.1.1. Data collection arrangements at national level	29
2.1.2. Collection of data on common indicators	33
2.1.3. Implementation of the structured survey	49
2.2. Timeliness of data collection	56
2.3. Accessibility to POs of integrated or interoperable IT systems, and data protection	58
3. Data collection systems for FEAD OP II type programmes	62
3.1. Comprehensiveness and proportionality of data collection	62
3.1.1. Data collection arrangements at national level	62
3.1.2. Data collection on common and programme-specific indicators	65
3.1.3. Implementation of evaluation surveys	70
3.2. Timeliness of data collection	73
3.3. Accessibility to POs of integrated or interoperable IT systems, and data protection	74
4. Transferability of good practice of data collection	76
Conclusions and recommendations	80
Collection of data on OP I type programmes	80
Collection of data on OP II type programmes	84
Outlook for the 2021-2027 programming period	87
Recommendations for the 2021-2027 programming period	88

Glossary

Accompanying measures	Activities provided in addition to the distribution of food and/or basic material assistance, with the aim of alleviating social exclusion and/or tackling social emergencies in a more empowering and sustainable way; for example, guidance on a balanced diet and on budget management.
Beneficiary	A public or private body responsible for initiating, or for initiating and implementing, FEAD projects.
Bottom-up approach	When applying a bottom-up approach to FEAD implementation, eligibility for support is identified at regional and/or local level, or at the discretion of the partner organisation directly involved in the distribution of food and material support.
Common indicator	An indicator with an agreed definition and measurement unit to be used when relevant in Operational Programmes, permitting aggregation to national and EU level.
E-cohesion system	An electronic data exchange system allowing all-electronic exchange of information between beneficiaries, managing authorities, certifying authorities and audit authorities.
End recipient	The most deprived person or persons, who receive support under FEAD.
Intermediate body	Public or private body which acts under the responsibility of a managing or certifying authority, or which carries out duties on behalf of such an authority in relation to beneficiaries' implementing operations.
Managing authority	A national ministry, regional authority, local council or other public or private body that has been nominated and approved by a Member State.
Operational Programme type I	An operational programme supporting the distribution of food or basic material assistance (including clothes, hygiene items and other essential items for personal use) to the most deprived persons, combined where applicable with accompanying measures aimed at alleviating the social exclusion of the most deprived persons.
Operational Programme type II	An operational programme supporting activities outside active labour market measures, consisting of non-financial, non-material assistance aimed at the social inclusion of the most deprived persons.
Partner organisation	Public bodies and/or non-profit organisations that deliver food and/or basic material assistance, where applicable, combined with accompanying measures directly or through other partner organisations, or which undertake activities aimed directly at the social inclusion of the most deprived persons.

Programme-specific indicator An indicator that can be used by Operational Programmes to complement the list of common indicators.

Top-down approach A top-down approach to FEAD implementation is characterized by the eligibility criteria set by the MA at national level such as being included in national social assistance / minimum income support schemes.

List of abbreviations

AIR(s)	Annual implementation report(s)
DG EMPL	Directorate-General for Employment Social Affairs and Inclusion
EC	European Commission
ESF	European Social Fund
EU	European Union
FEAD	Fund for European Aid to the Most Deprived
FEANTSA	European Federation of National Organisations Working with the Homeless
FEBA	European Food Banks Federation
IB	Intermediate body
OP(s)	Operational Programme(s)
MA(s)	Managing authority(ies)
MS(s)	Member State(s)
PO(s)	Partner organisation(s)
SFC2014	System for Fund Management in the European Union in the 2014–2020 programming period

Executive summary

The **Fund for European Aid to the Most Deprived (FEAD)** created in 2014, aims to alleviate the worst forms of poverty in the EU and to promote the social inclusion of the most deprived persons. FEAD provides material support and social inclusion measures to the target groups defined at national level and complements actions that are funded under the ESF as social inclusion activities. **Monitoring** is an essential component of FEAD, as a number of input, output and result indicators must be reported annually by Member States. Comprehensive, proportionate, timely and accessible data collected by the national authorities allows the assessment of progress in the implementation of FEAD programmes and the European Commission level mid-term and final evaluation of FEAD funded activities.

The main objective of this **study supporting the monitoring of FEAD** was to assess the data collection and monitoring systems of FEAD programmes at national level, and to identify good practices for both Operational Programme types I and II implemented during the period 2014-2020 in all participating Member States. To assess FEAD monitoring and data collection methodologies for the 27 Member States at national level, the study team conducted thorough desk research and interviews at EU and national level, organised two focus groups and a workshop with FEAD stakeholders. The field work for this study was completed at the end of 2021, prior to recent military aggression by the Russian Federation against Ukraine and the ongoing armed conflict.

The report presents the key findings on the data collection systems established for Operational Programme types I and II, following the governing principles described in the Better Regulation Guidelines with regard to monitoring discussed below.

Comprehensiveness and proportionality of data collection systems

The analysis conducted shows that the monitoring of FEAD-funded Operational Programme types I and II in different Member States follows the FEAD legislation and guidance on data collection and reporting.

Counting was the most common method of data collection across the Operational Programmes type I, but in most cases Member States applied approaches based on a **mixture of data collection methods**. **Simple and streamlined reporting based on informed estimates** meets the minimum requirements of the FEAD legal framework. It is a **proportionate** and reliable method in Member States that rely on a bottom-up approach¹, involving close cooperation between the Managing authorities, partner organisations and frontline organisations. Though **counting** allows specific target groups to be identified more accurately, **informed estimates** also provide sufficient evidence and allow comparisons with other data while reducing administrative burden.

The Managing authorities of Operational Programmes type II also rely on a bottom-up approach and apply data collection methods ranging from counting, informed estimates and external registers to surveys, in order to collect and report on common and programme-specific indicators.

Access to user-friendly IT solutions for FEAD monitoring, as well as training and support in the use of these solutions, **reduces the administrative burden on partner**

¹ Several Member States (AT, BE, FI, FR, IT, LU) apply a bottom-up approach to the implementation of FEAD OPs, in which eligibility for support is identified at regional and/or local level, or at the discretion of the partner organisation directly involved in the distribution of food and material support. In most cases where FEAD OP implementation relies on a bottom-up approach, no specific proof of eligibility is required from recipients of support.

organisations and contributes to the quality of monitoring data. To simplify and facilitate both the collection of data on FEAD end recipients and the data quality checks implemented by the Managing authorities, **linkages between FEAD IT systems and national social support registers** were established in those Member States where eligibility for FEAD support is based on registers.

Across all Operational Programmes type I, **national-level methodological guidelines or instructions** on how the data on indicators should be collected and calculated are available for 61 % of common output and result indicators. To support partner organisations and beneficiaries in data collection, the Managing authorities also organise **training, regular meetings** and provide **ad hoc methodological support**.

The limited human and administrative capacities of some partner organisations and frontline organisations can cause errors and reduce the accuracy of the data reported to the Managing authority. The most significant **errors** detected by the Managing authorities were in relation to the **double counting of end recipients** and **over-reporting of the total number of persons supported**. To **verify the plausibility of the values** reported, the Managing authorities or intermediate bodies conduct **comparisons against data from external registers and historical data**, or **sample-based documentary checks**.

Timeliness of data collection

The **frequency of reporting** on monitoring indicators varies from real-time or weekly reporting to annual, which meets the minimum requirements of FEAD legal framework. The research shows that Member States which rely on a **bottom-up approach** to FEAD implementation for Operational Programmes type I and do not require the personal identification of end recipients also apply the minimum requirement of annual reporting. Member States that rely on a **top-down approach**², or which use a bottom-up approach but have comprehensive IT systems set rules requiring more frequent reporting. Shorter reporting deadlines (e.g. weekly or monthly) allow for the timely identification of mistakes and reporting errors. However, if reporting is not supported by well-developed IT systems, frequent reporting imposes an additional burden on partner organisations.

Current data collection arrangements for Operational Programmes II type allow for reporting the data to the EC in a timely manner. Moreover, the frequency of data collection considers the types of social inclusion activities and programme-specific indicators used to monitor them.

Accessibility to integrated or interoperable IT systems

In ten Member States, **access to integrated or interoperable IT systems** and tools developed by the Managing authorities for the monitoring of implementation of FEAD Operational Programmes type I contributes to the reliability of data, more effective data collection, and the better fulfilment of data confidentiality requirements. In Member States with simple and streamlined data collection arrangements, the exchange of anonymised data via e-mail and the storage of data using the electronic systems of the Managing authorities meets the minimum requirements for FEAD monitoring.

The accessibility of data for monitoring of the FEAD Operational Programmes type II is ensured by partner organisations as the main providers of primary data in three countries out of four. Given the small number of projects and actors involved in the delivery of FEAD support in two countries, a substantial part of data collection, aggregation and reporting is based on the exchange of information by e-mail.

² When Member States rely on a top-down approach, the eligibility criteria are set by the MA at national level and are usually based on the precondition that the eligibility of a person or a household is based on whether or not they are included in national social assistance / minimum income support schemes.

All Member States that implement Operational Programme types I and II have undertaken measures to ensure adequate **protection of sensitive data**. An overview of FEAD data collection arrangements shows that where data are collected for the purpose of monitoring and reporting, they are usually stored by or only accessible to those at the very lowest level of FEAD implementation.

Recommendations for the 2021-2027 programming period

Based on the assessment of the comprehensiveness, proportionality, timeliness and accessibility of FEAD data collection and monitoring systems at national level, the study team makes the following recommendations for the attention of FEAD and European Social Fund Plus (ESF+) stakeholders and in particular, the Managing authorities in charge of designing the monitoring system at national level:

1. **Consider the possibility of using a light, estimates-based data collection system** in Member States where a bottom-up approach is followed in order to reduce unnecessary administrative burden to partner organisation;
2. Develop **a unified methodology for the estimation and data collection templates** to be used by all partner organisation or the Managing authority to calculate and report the values of common indicators in order to ensure the consistency and reliability of estimated values;
3. Establish **linkages between FEAD monitoring IT systems and national social assistance registers** in order to retrieve the anonymised data on the number of end recipients and their sociodemographic characteristics;
4. Ensure **direct access or interfaced connection to FEAD IT systems** for partner organisations in order to reduce administrative burden and contribute to the reliability of monitoring data;
5. Provide IT tools (ranging from **simple, cloud-based solutions to more sophisticated systems**) to report monitoring data where partner organisations lack administrative capacities;
6. Ensure that the monitoring data provided by partner organisations via e-mail or using cloud-based solutions is either **anonymised or sufficiently well protected** where sensitive or confidential data is concerned;
7. Provide adequate **user guidance on data collection and training** to enable the effective use of methodologies and IT solutions;
8. Provide technical assistance and advice to partner organisations with regard to *ad hoc* issues relating to data collection and the use of IT tools;
9. Perform quality checks on reported data using the IT system's **in-built checks** to avoid the incorrect use of measurements, decimal separators, etc.;
10. Automate **comparisons of data** collected on FEAD/ESF+ funded activities and outputs **with other data sources** through interlinkages to financial data from programme and national social assistance registers;
11. **Maintain light FEAD monitoring arrangements** and avoid, when possible, imposing national rules that go beyond FEAD legal requirements ('gold plating') especially when such features are not supported by appropriate IT tools. Examples

include signature confirmation of receipt for support, submission of primary data on end recipients, and the collection of data exclusively on the basis of counting.

To improve the comparability of structured survey data and the appropriate use of survey data for FEAD evaluation, it is recommended to:

12. Consider the possibility of **reformulating the questions** provided in the template of **the structured survey** when they are not easily understandable for non-professionals, including FEAD end recipients, or when they need to fit the specific context of the support provided. However, the structured survey template should be respected and the sense of questions should not be changed in order to allow for aggregation of survey results at EU level.
13. Envisage a **robust methodology for the aggregation and analysis of responses** at national level to ensure the comparability of data at EU level. The availability of descriptive statistics that provide the distribution of responses by different types of support and FEAD target groups monitored by result indicators, would allow the meaningful aggregation and interpretation of structured survey results at EU level.
14. **Address identified gaps and inconsistencies** in structured survey data **by using additional research methods**, e.g. analysis of the raw data from structured surveys, focus groups and consultations with FEAD stakeholders at national level.

In addition to the recommendations above, the study team recommends the following actions to improve data collection and reporting on **FEAD social inclusion programmes (Operational Programmes type II)**, in particular, on **programme-specific result indicators**:

15. Provide **unified templates** and a **methodology** for the collection of data on end recipients that measure the result of the intervention (e.g. engagement in various types of activities, the use of services, change of personal situation, etc.);
16. Consider the possibility of **collecting data on programme-specific result indicators from administrative registers** or other data collected by service providers (e.g. early childhood education and care, health services, employment services, etc.) when this is relevant for the type and objective of FEAD-funded social inclusion activities;
17. Conduct **surveys of end recipients and beneficiaries/partner organisations** at various points in programme implementation. Such regular surveys reduce the risk of attrition, lack of response and biased answers, which affect the reported values of the programme-specific indicator. These regular surveys may also be a relevant part of national programme evaluations, if carried out.

Zusammenfassung

Der **Europäische Hilfsfonds für die am stärksten benachteiligten Personen (EHAP)** wurde 2014 mit dem Ziel eingerichtet, die schlimmsten Formen der Armut in der EU zu bekämpfen und die soziale Eingliederung der am stärksten benachteiligten Personen zu fördern. Der EHAP bietet den von den Mitgliedstaaten identifizierten Zielgruppen materielle Unterstützung und Maßnahmen zur sozialen Inklusion und ergänzt die im Rahmen des ESF geförderten Eingliederungsmaßnahmen. Das **Monitoring** ist ein zentraler Baustein des EHAP und die Mitgliedstaaten, da eine Reihe von Input-, Output- und Ergebnisindikatoren von den Mitgliedstaaten jährlich gemeldet werden müssen. Dank dieser umfassenden, verhältnismäßigen, aktuellen und leicht zugänglichen Daten, die von den Behörden der Mitgliedstaaten erfasst werden, können die Fortschritte bei der Umsetzung des EHAP bewertet und die durch den EHAP geförderten Maßnahmen in einem Zwischen- und einem Abschlussbericht von der Europäischen Kommission evaluiert werden.

Hauptziel dieser **Studie zum Monitoring des EHAP** war es, die Datenerhebungs- und Auswertungssysteme des EHAP Programme auf nationaler Ebene zu bewerten und bewährte Verfahren für die Operationellen Programme der Typen I und II zu identifizieren, die im Zeitraum 2014-2020 in allen teilnehmenden Mitgliedstaaten durchgeführt wurden. Um die Methoden zur Erfassung und Überwachung der EHAP-Daten in den 27 Mitgliedstaaten bewerten zu können, führte das Studienteam gründliche Sekundärforschung und Interviews auf europäischer und nationaler Ebene durch und organisierte zwei Fokusgruppen und einen Workshop mit EHAP-Akteuren. Die praktische Recherche für diese Studie wurde Ende 2021, also noch vor dem aktuellen militärischen Angriff der Russischen Föderation auf die Ukraine und dem laufenden bewaffneten Konflikt abgeschlossen.

Der vorliegende Bericht stellt die wichtigsten Erkenntnisse zu den Datenerhebungssystemen, die für die operationellen Programme der Typen I und II eingerichtet wurden, vor und orientiert sich dabei an den folgenden Grundsätzen der Leitlinien für bessere Rechtssetzung in Bezug auf das Monitoring.

Vollständigkeit und Verhältnismäßigkeit der Datenerhebungssysteme

Die durchgeführte Analyse zeigt, dass das Monitoring der vom EHAP finanzierten Operationellen Programme der Typen I und II in allen Mitgliedstaaten den für den EHAP geltenden Rechtsvorschriften und den Leitlinien für die Datenerhebung und -berichterstattung entspricht.

Zählung war die gängigste Form der Datenerhebung in allen Operationellen Programmen des Typs I, wobei in den meisten Fällen die Mitgliedstaaten eine **Mischung aus mehreren Datenerfassungsmethoden** anwandten. **Einfache und schlanke Meldesysteme auf der Grundlage informierter Schätzungen** erfüllen die Mindestanforderungen, die im rechtlichen Rahmen für den EHAP festgelegt sind. Dabei handelt es sich um eine **verhältnismäßige** und zuverlässige Methode in den Mitgliedstaaten, die auf einem Bottom-up-Ansatz beruht³ und eine enge Zusammenarbeit zwischen den Verwaltungsbehörden, Partnerorganisationen und den Trägern vor Ort erfordert. Obwohl bestimmte Zielgruppen durch **Zählungen** genauer identifiziert werden können, liefern auch die durch **informierte**

³ Mehrere Mitgliedstaaten (AT, BE, FI, FR, IT, LU) folgen bei der Umsetzung der OP einem Bottom-up-Ansatz, bei dem die Entscheidung, wer Anspruch auf Hilfen hat, auf regionaler und/oder lokaler Ebene oder durch die Partnerorganisationen getroffen wird, die direkt an der Verteilung der Lebensmittelhilfen oder materiellen Unterstützung beteiligt sind. In den meisten Fällen mit Bottom-up-Ansatz müssen die Unterstützungsempfänger ihre Förderungsfähigkeit nicht speziell nachweisen.

Schätzungen gewonnenen Daten ausreichende Nachweise und ermöglichen Vergleiche mit anderen Daten bei gleichzeitiger Verringerung des Verwaltungsaufwands.

Auch die Verwaltungsbehörden der Operationellen Programme II nutzen ebenfalls einen Bottom-up-Ansatz und setzen bei der Datenerhebung für die Erhebung und Meldung allgemeiner und programmspezifischer Indikatoren auf einen Methodenmix aus Zählungen, informierten Schätzungen, externen Registern und Befragungen.

Zugang zu nutzerfreundlichen IT-Lösungen für das EHAP-Monitoring sowie Schulungen und Support bei der Nutzung dieser Lösungen **senken den Verwaltungsaufwand der Partnerorganisationen** und verbessern die Qualität der erfassten Daten. Um sowohl die Erhebung von Daten über die Endempfänger des EHAP als auch die von den Verwaltungsbehörden durchgeführten Datenqualitätskontrollen zu vereinfachen und zu erleichtern, wurden **Verknüpfungen zwischen den EHAP IT-Systemen und den nationalen Registern für soziale Unterstützung** in den Mitgliedstaaten eingerichtet, in denen die Förderfähigkeit im Rahmen des EHAP auf Registern beruht.

Bei den Operationellen Programmen des Typs I gibt es bei 61 % aller gemeinsamen Output- und Ergebnisindikatoren **methodologische Leitlinien oder Vorschriften auf nationaler Ebene** für deren Erhebung und Berechnung. Um die Partnerorganisationen und Trägern vor Ort bei der Datenerhebung zu unterstützen, organisieren die Verwaltungsbehörden außerdem **Schulungen** und **regelmäßige Treffen** und leisten **ad hoc methodologischen Support**.

Die begrenzten personellen und administrativen Kapazitäten einiger Partnerorganisationen und Träger können zu Fehlern führen und die Genauigkeit der an die Verwaltungsbehörden gemeldeten Daten beeinträchtigen. Die wichtigsten **Fehler**, die von den Verwaltungsbehörden festgestellt wurden, bezogen sich auf die **Doppelzählung von Endempfängern** und die **Meldung von zu hohen Hilfsempfängerzahlen**. Um zu überprüfen, **ob die gemeldeten Zahlen plausibel sind**, führten die Verwaltungsbehörden oder zwischengeschaltete Stellen **einen Abgleich mit den Daten externer Register** und **historischer Daten** oder **stichprobenartige Kontrollen der Unterlagen** durch.

Aktualität der Datenerfassung

Die **Häufigkeit der Berichterstattung** zu den Monitoring-Indikatoren reicht von Meldungen in Echtzeit oder einmal pro Woche bis zu jährlichen Meldeberichten, was den im rechtlichen Rahmen für den EHAP festgelegten Mindestanforderungen entspricht. Die Untersuchung zeigt, dass diejenigen Mitgliedstaaten, die bei der Umsetzung der Operationellen Programme des Typs I einen **Bottom-up-Ansatz** verfolgen und keine persönliche Identifizierung der Endempfänger vorschreiben, sich auch mit der Mindestanforderung einer jährlichen Berichterstattung zufriedengeben. Mitgliedstaaten, die einem **Top-down-Ansatz**⁴ folgen oder einen Bottom-up-Ansatz in Kombination mit flächendeckenden IT-Systemen anwenden, legen Vorschriften fest, die eine häufigere Berichterstattung erfordern. Bei kürzeren Meldefristen (z. B. wöchentlich oder monatlich) werden Fehler und falsche Zahlen schneller erkannt. Wenn die Berichterstattung jedoch nicht durch gut entwickelte IT-Systeme unterstützt wird, stellt die häufige Berichterstattung eine zusätzliche Belastung für die Partnerorganisationen dar.

Die bestehenden Regelungen zur Datenerfassung für die Operationellen Programme des Typs II ermöglichen eine zeitnahe Meldung der Daten an die Europäische Kommission. Außerdem werden bei der Häufigkeit der Datenerhebung die Art der sozialen

⁴ Wenn Mitgliedstaaten einem Top-down-Ansatz folgen, werden die Kriterien für die Förderfähigkeit von den Verwaltungsbehörden auf nationaler Ebene festgelegt und bedeuten in der Regel, dass die Förderfähigkeit von Personen oder Haushalten davon abhängt, ob diese unter nationale Systeme für Sozialhilfe bzw. Mindesteinkommen fallen.

Eingliederungsmaßnahmen und die programmspezifischen Indikatoren berücksichtigt, mit denen diese überwacht werden.

Zugang zu integrierten oder interoperablen IT-Systemen

In zehn Mitgliedstaaten trägt der **Zugang zu integrierten oder interoperablen IT-Systemen** und -Tools, die von den Verwaltungsbehörden entwickelt wurden, um die Umsetzung der Operationellen Programme des Typs I des EHAP zu überwachen, zu verlässlichen Daten, einer effizienteren Datenerhebung und einer besseren Erfüllung der Datenschutzvorschriften bei. In Mitgliedstaaten mit einfachen und schlanken Datenerhebungssystemen erfüllt der Austausch anonymisierter Daten per E-Mail und die Speicherung der Daten auf den elektronischen Systemen der Verwaltungsbehörden die Mindestanforderungen für das EHAP-Monitoring.

Die Verfügbarkeit der Daten für das Monitoring der Operationellen Programme des Typs II wird in drei von vier Ländern durch Partnerorganisationen gewährleistet, die die Hauptquelle für die Primärdaten darstellen. In zwei Ländern ist die Anzahl der Projekte und der an der Verteilung von EHAP-Hilfen beteiligten Akteure so gering, dass der größte Teil der Datenerfassung, -aggregation und -übermittlung auf dem Austausch von Informationen per E-Mail beruht.

Alle Mitgliedstaaten, die Operationelle Programme der Typen I und II umsetzen, haben angemessene Maßnahmen **zum Schutz sensibler Daten** getroffen. Ein Überblick über die Regelungen zur Erhebung von EHAP-Daten zeigt, dass Daten, die für Monitoring- und Meldezwecke erhoben werden, in der Regel bei den Trägern gespeichert werden, die auf unterster Ebene an der EHAP-Umsetzung beteiligt sind, oder nur diesen Trägern zugänglich sind.

Empfehlungen für den Programmplanungszeitraum 2021-2027

Auf der Grundlage der Bewertung der Vollständigkeit, Verhältnismäßigkeit, Aktualität und Zugänglichkeit der EHAP-Datenerhebungs- und Überwachungssysteme auf nationaler Ebene richtet das Studienteam folgende Empfehlungen an die am EHAP und dem Europäischen Sozialfonds Plus (ESF+) beteiligten Akteure und insbesondere die Verwaltungsbehörden, die für die Gestaltung des Monitoring-Systems auf nationaler Ebene zuständig sind:

1. Mitgliedstaaten, die einem Bottom-up-Ansatz folgen, **sollten prüfen, ob sie ein vereinfachtes Datenerhebungssystem auf der Basis von Schätzungen** einführen können, das einen unnötigen Verwaltungsaufwand für Partnerorganisationen vermeidet.
2. Es sollten eine **einheitliche Methodologie für Schätzungen und Datenerhebungsformulare** entwickelt werden, die von allen Partnerorganisationen oder der Verwaltungsbehörde zur Berechnung und Meldung der Werte für gemeinsame Indikatoren verwendet werden, um Konsistenz und Zuverlässigkeit der Schätzwerte zu verbessern.
3. Es sollten **Verknüpfungen zwischen den IT-Systemen für das EHAP-Monitoring und nationalen Sozialhilferegistern** eingerichtet werden, mit deren Hilfe sich anonymisierte Daten über die Zahl der Endempfänger und deren soziodemografische Merkmale gewinnen lassen.
4. Es sollte dafür gesorgt werden, dass Partnerorganisationen **einen direkten Zugang oder eine Schnittstelle zu den EHAP-IT-Systemen** erhalten, um den

Verwaltungsaufwand zu senken und die Zuverlässigkeit der Monitoring-Daten zu verbessern.

5. Wo Partnerorganisationen die nötigen administrativen Ressourcen fehlen, sollten ihnen IT-Hilfsmittel (von **einfachen, cloud-basierten Lösungen bis zu ausgefeilteren Systemen**) für die **Meldung der Monitoring-Daten** bereitgestellt werden.
6. Wenn es um sensible oder vertrauliche Daten geht, sollte sichergestellt werden, dass die von Partnerorganisationen per E-Mail oder cloud-basierte Lösungen bereitgestellten Monitoring-Daten **anonymisiert oder ausreichend geschützt sind**.
7. Es sollten angemessene **Benutzerleitfäden und Schulungen zur Datenerhebung** bereitgestellt werden, die gewährleisten, dass die Methoden und IT-Lösungen effizient eingesetzt werden.
8. Bei *ad hoc*-Fragen in Bezug auf die Datenerhebung und die Nutzung der IT-Systeme sollten Partnerorganisationen Zugang zu technischem Support und Beratung haben.
9. Um falsche Maßangaben, Dezimalstellen usw. zu vermeiden, sollten mit Hilfe der **integrierten Prüffunktionen** des IT-Systems Qualitätsprüfungen der gemeldeten Daten durchgeführt werden.
10. Der **Vergleich der Daten** zu den von EHAP/ESF+ geförderten Maßnahmen und Ergebnissen **mit anderen Datenquellen** sollte durch Verknüpfungen mit den Finanzdaten des Programms und nationaler Sozialhilferegister automatisiert werden.
11. **Die Regelungen zum EHAP-Monitoring sollten möglichst schlank gehalten** werden und wenn möglich, keine nationalen Vorschriften enthalten, die über die EHAP rechtlichen Vorgaben hinausgehen („Überregulierung“), insbesondere wenn diese Merkmale nicht durch geeignete IT-Tools unterstützt werden. Beispiele hierfür sind die Quittierung von Hilfsleistungen durch die Endempfänger, die Übermittlung von Primärdaten über die Endempfänger und die Datenerhebung ausschließlich auf der Grundlage von Zählungen.

Um zu gewährleisten, dass die durch strukturierte Befragungen erhobenen Daten, besser vergleichbar und damit besser für die Evaluation des EHAP geeignet sind, wird Folgendes empfohlen:

12. Wenn die Fragen im Formular **für die strukturierte Befragung** für Laien, wie die Endempfänger der EHAP-Hilfen, nur schwer verständlich sind oder müssen an den jeweiligen Kontext angepasst werden, sollte geprüft werden, **ob man die Fragen umformulieren kann**. Um die Aggregation der Befragungsergebnisse auf EU-Ebene zu ermöglichen, sollte die Struktur des Befragungsformulars und der Sinn der Fragen dabei jedoch nicht geändert werden.
13. Es sollte eine **solide Methodologie für die Aggregation und Analyse der Antworten** auf nationaler Ebene entwickelt werden, um die Vergleichbarkeit der Daten auf EU-Ebene zu gewährleisten. Die Verfügbarkeit deskriptiver Statistiken, die die Einteilung der Antworten nach Unterstützungsarten und EHAP-Zielgruppen, die durch Ergebnisindikatoren überwacht werden, ermöglichen eine aussagekräftige Aggregation und Interpretation strukturierter Umfrageergebnisse auf EU-Ebene.

14. **Lücken und Widersprüche** in den durch strukturierte Befragungen gewonnenen Daten sollten **durch ergänzende Forschungsmethoden identifiziert** und behoben werden, z. B. durch die Analyse der Rohdaten aus strukturierten Befragungen, Fokusgruppen und Gesprächen mit EHAP-Akteuren in den Mitgliedstaaten.

Neben den oben genannten Maßnahmen empfiehlt das Studienteam die folgenden Maßnahmen, um die Datenerhebung und -berichterstattung in Bezug auf die **EHAP-Programme zur sozialen Inklusion (Operationelle Programme der Typ II)** und insbesondere die **programmspezifischen Ergebnisindikatoren** zu verbessern:

15. Es sollten **einheitliche Formulare** und eine **Methodologie** für die Erhebung von Daten über die Endempfänger entwickelt werden, die das Ergebnis der Maßnahme messen (z. B. Teilnahme an verschiedenen Aktivitäten, Nutzung von Dienstleistungen, Änderungen der persönlichen Situation usw.).
16. Es sollte geprüft werden, ob **Daten zu programmspezifischen Ergebnisindikatoren aus Verwaltungsregistern** oder anderen von Dienstleistern erhobenen Daten **gewonnen** werden können (z. B. frühkindliche Betreuung, Bildung und Erziehung, Gesundheitsdienste, Arbeitsverwaltungen), sofern dies für Art und Ziel der EHAP-geförderten sozialen Eingliederungsmaßnahmen relevant ist.
17. An verschiedenen Punkten der Umsetzung sollten **Befragungen der Endempfänger und der Trägern bzw. Partnerorganisationen** durchgeführt werden. Regelmäßige Befragungen senken die Gefahr von Verzerrung durch Ausfall von Teilnehmern, mangelnder Reaktion und verzerrten Antworten, die sich auf die gemeldeten Werte des programmspezifischen Indikators auswirken. Diese regelmäßigen Erhebungen können auch ein relevanter Bestandteil der Evaluierungen der nationalen Programme sein, sofern letztere durchgeführt werden.

Résumé analytique

Le **Fonds européen d'aide aux plus démunis (FEAD)** créé en 2014 a pour objectifs d'atténuer les pires formes de pauvreté dans l'UE et de promouvoir l'inclusion sociale des personnes les plus démunies. Le FEAD fournit un soutien matériel et des mesures d'inclusion sociale à des groupes cibles définis au niveau national et complète les actions financées par le Fonds social européen (FSE) en tant qu'activités d'inclusion sociale. Le **suivi** est une composante essentielle du FEAD, puisqu'un certain nombre d'indicateurs d'entrée, de réalisations et de résultats doivent être communiqués annuellement par les États membres. Les données complètes, proportionnées, opportunes et accessibles recueillies par les autorités nationales permettent d'analyser l'avancement des programmes du FEAD et de procéder à l'évaluation à mi-parcours et finale, par la Commission européenne, des activités financées par le FEAD.

L'objectif principal de cette **étude en soutien au suivi du FEAD** est d'évaluer les systèmes de collecte de données et de suivi des programmes du FEAD au niveau national, et d'identifier les bonnes pratiques pour les types de programmes opérationnels I et II mis en œuvre au cours de la période 2014-2020 dans tous les États membres participants. Afin d'évaluer les méthodologies de suivi et de collecte de données du FEAD pour les 27 États membres au niveau national, l'équipe chargée de l'étude a effectué des recherches documentaires approfondies, réalisé des entretiens au niveau européen et national, et organisé deux groupes de discussion ainsi qu'un atelier avec les acteurs du FEAD. Le travail de terrain pour cette étude s'est achevé à la fin de l'année 2021, soit avant la récente agression militaire de la Fédération de Russie contre l'Ukraine et le conflit armé en cours.

Le rapport présente les principaux résultats des systèmes de collecte de données mis en place pour les types de programmes opérationnels I et II, en suivant les principes des lignes directrices pour une meilleure réglementation.

Exhaustivité et proportionnalité des systèmes de collecte de données

L'analyse réalisée montre que le suivi des programmes opérationnels de type I et II financés par le FEAD dans les différents États membres respecte la législation et les orientations du FEAD en matière de collecte de données et d'établissement de rapports.

Le **comptage** est la méthode de collecte de données la plus courante dans les programmes opérationnels de type I ; dans la plupart des cas cependant, les États membres ont appliqué des approches basées sur un **mélange de méthodes de collecte de données**. Un **établissement simple et rationalisé des rapports, basé sur des estimations informées**, répond aux exigences minimales du cadre juridique du FEAD. Il s'agit d'une méthode **proportionnée** et fiable dans les États membres qui s'appuient sur une approche ascendante⁵, impliquant une coopération étroite entre les autorités de gestion, les organisations partenaires et les organisations de première ligne. Bien que le **comptage** permette d'identifier plus précisément des groupes cibles spécifiques, les **estimations informées** fournissent également des preuves suffisantes et permettent des comparaisons avec d'autres données tout en réduisant la charge administrative.

Les autorités de gestion des programmes opérationnels de type II s'appuient également sur une approche ascendante et appliquent des méthodes de collecte de données telles que le

⁵ Plusieurs États membres (AT, BE, FI, FR, IT, LU) appliquent une approche ascendante à la mise en œuvre des programmes opérationnels FEAD, dans laquelle l'éligibilité à l'aide est identifiée au niveau régional et/ou local, ou à la discrétion de l'organisation partenaire directement impliquée dans la distribution de l'aide alimentaire et matérielle. Dans la plupart des cas où la mise en œuvre du programme opérationnel FEAD repose sur une approche ascendante, aucune preuve spécifique d'éligibilité n'est exigée des bénéficiaires de l'aide.

comptage, les estimations informées et les registres externes aux enquêtes, afin de collecter et de rendre compte des indicateurs communs et spécifiques aux programmes.

L'**accès à des solutions informatiques conviviales** pour le suivi du FEAD, ainsi que la formation et le soutien à l'utilisation de ces solutions, **réduisent la charge administrative des organisations partenaires** et contribuent à la qualité des données de suivi. Afin de simplifier et de faciliter à la fois la collecte de données auprès des bénéficiaires finaux du FEAD et les contrôles de qualité des données effectués par les autorités de gestion, des **liens entre les systèmes informatiques du FEAD et les registres nationaux d'aide sociale** ont été établis dans les États membres où l'éligibilité à l'aide du FEAD est identifiée sur la base d'informations provenant de ces registres.

Dans tous les programmes opérationnels de type I, des **directives méthodologiques** ou des **instructions au niveau national** sur la manière dont les données des indicateurs doivent être collectées et calculées sont disponibles pour 61 % des indicateurs communs de réalisations et de résultats. Afin de soutenir les organisations partenaires et les prestataires dans la collecte des données, les autorités de gestion organisent également des **formations**, des **réunions régulières** et fournissent un **soutien méthodologique ad hoc**.

Les capacités humaines et administratives limitées de certaines organisations partenaires et des organisations de première ligne peuvent entraîner des erreurs et réduire la précision des données communiquées à l'autorité de gestion. Les **erreurs** les plus importantes détectées par les autorités de gestion concernent le **double comptage des bénéficiaires finaux** et la **surdéclaration du nombre total de personnes aidées**. Afin de **vérifier la plausibilité des valeurs** déclarées, les autorités de gestion ou les organismes intermédiaires effectuent des **comparaisons avec des données provenant de registres externes et des données historiques**, ou des **contrôles documentaires par sondage**.

Fréquence de la collecte des données

La **fréquence d'établissement des rapports** sur les indicateurs de suivi varie, des rapports en temps réel ou hebdomadaires aux rapports annuels, ce qui répond aux exigences minimales du cadre juridique du FEAD. La recherche montre que les États membres qui s'appuient sur une **approche ascendante** de la mise en œuvre du FEAD pour les programmes opérationnels de type I et qui n'exigent pas l'identification personnelle des bénéficiaires finaux appliquent également l'exigence minimale de rapport annuel. Les États membres qui ont recours à une **approche descendante**⁶, ou qui utilisent une approche ascendante mais disposent de systèmes informatiques complets, fixent des règles exigeant des rapports plus fréquents. Des délais de rapports plus courts (par exemple, hebdomadaires ou mensuels) permettent d'identifier à temps les manquements et les erreurs de déclaration. Cependant, si les rapports ne sont pas soutenus par des systèmes informatiques bien développés, les rapports fréquents imposent une charge supplémentaire aux organisations partenaires.

Les modalités actuelles de collecte des données pour les programmes opérationnels de type II permettent de communiquer les données à la CE en temps voulu. En outre, la fréquence de la collecte des données tient compte des types d'activités d'inclusion sociale et des indicateurs spécifiques au programme utilisés pour les contrôler.

⁶ Lorsque les États membres s'appuient sur une approche descendante, les critères d'éligibilité sont fixés par l'autorité de gestion au niveau national et reposent généralement sur la condition préalable selon laquelle l'éligibilité d'une personne ou d'un ménage dépend de son inclusion ou non dans les régimes nationaux d'aide sociale / de revenu minimum.

Accessibilité à des systèmes informatiques intégrés ou interopérables

Dans dix États membres, l'**accès à des systèmes et outils informatiques intégrés ou interopérables** développés par les autorités de gestion pour le suivi de la mise en œuvre des programmes opérationnels du FEAD de type I contribue à la fiabilité des données, à une collecte plus efficace des données et à un meilleur respect des exigences de confidentialité des données. Dans les États membres où les modalités de collecte des données sont simples et rationalisées, l'échange de données anonymes par courrier électronique et le stockage des données au moyen des systèmes électroniques des autorités de gestion répondent aux exigences minimales du suivi du FEAD.

L'accessibilité des données pour le suivi des programmes opérationnels de type II du FEAD est assurée par les organisations partenaires en tant que principaux fournisseurs de données primaires dans trois pays sur quatre. Compte tenu du petit nombre de projets et d'acteurs impliqués dans la mise en œuvre de l'aide du FEAD dans deux pays, une part importante de la collecte, de l'agrégation et de la communication des données est basée sur l'échange d'informations par courrier électronique.

Tous les États membres qui mettent en œuvre des programmes opérationnels de type I et II ont pris des mesures pour assurer une **protection adéquate des données sensibles**. Un aperçu des modalités de collecte des données du FEAD montre que lorsque des données sont collectées à des fins de suivi et d'établissement de rapports, elles sont généralement stockées par les personnes situées au niveau le plus bas de la mise en œuvre du FEAD ou ne sont accessibles que par ces personnes.

Recommandations pour la période de programmation 2021-2027

Sur la base de l'évaluation de l'exhaustivité, de la proportionnalité, de la fréquence et de l'accessibilité des systèmes de collecte de données et de suivi du FEAD au niveau national, l'équipe chargée de l'étude formule les recommandations suivantes à l'attention des acteurs du FEAD et du Fonds social européen Plus (FSE+), et en particulier des autorités de gestion chargées de concevoir le système de suivi au niveau national :

1. **Envisager la possibilité d'utiliser un système de collecte de données léger, basé sur des estimations**, dans les États membres où une approche ascendante est suivie afin de réduire la charge administrative inutile pour l'organisation partenaire ;
2. Développer une **méthodologie unifiée pour l'estimation et les modèles de collecte de données** à utiliser par toutes les organisations partenaires ou l'autorité de gestion, pour calculer et rapporter les valeurs des indicateurs communs afin d'assurer la cohérence et la fiabilité des valeurs estimées ;
3. Établir des **liens entre les systèmes informatiques de suivi du FEAD et les registres nationaux d'aide sociale** afin de récupérer les données anonymisées sur le nombre de bénéficiaires finaux et leurs caractéristiques sociodémographiques ;
4. Assurer un **accès direct ou une connexion interfacée aux systèmes informatiques du FEAD** pour les organisations partenaires afin de réduire la charge administrative et de contribuer à la fiabilité des données de suivi ;
5. Fournir des outils informatiques (**simples solutions basées sur le cloud ou systèmes plus sophistiqués**) pour rendre compte des données de suivi lorsque les organisations partenaires manquent de capacités administratives ;

6. Veiller à ce que les données de suivi fournies par les organisations partenaires par courrier électronique ou à l'aide de solutions basées sur le cloud soient **anonymisées ou suffisamment bien protégées** lorsque des données sensibles ou confidentielles sont concernées ;
7. Fournir des **instructions et une formation adéquate aux utilisateurs sur la collecte des données** afin de permettre l'utilisation efficace des méthodologies et des solutions informatiques ;
8. Fournir une assistance technique et des conseils aux organisations partenaires pour toutes les questions *ad hoc* relatives à la collecte de données et à l'utilisation des outils informatiques ;
9. Effectuer des contrôles de qualité sur les données déclarées en utilisant les **contrôles intégrés** du système informatique pour éviter l'utilisation incorrecte de mesures, séparateurs décimaux, etc. ;
10. Automatiser les **comparaisons des données** recueillies sur les activités et les résultats financés par le FEAD/ESF+ **avec d'autres sources de données** grâce à des liens avec les données financières du programme et les registres nationaux d'aide sociale ;
11. **Maintenir des dispositifs légers de suivi du FEAD** et éviter, lorsque cela est possible, d'imposer des règles nationales qui vont au-delà des exigences légales du FEAD (« surréglementation »), surtout lorsque celles-ci ne sont pas soutenues par des outils informatiques appropriés. Il s'agit par exemple de la confirmation par signature de la réception d'un soutien, de la fourniture de données primaires sur les bénéficiaires finaux ou de la collecte de données exclusivement sur la base du comptage.

Afin d'améliorer la comparabilité des données d'enquêtes structurées et l'utilisation appropriée des données d'enquêtes pour l'évaluation du FEAD, il est recommandé de :

12. Envisager la possibilité de **reformuler les questions** fournies dans le modèle **des enquêtes structurées** lorsqu'elles ne sont pas facilement compréhensibles pour les non-professionnels, y compris les bénéficiaires finaux du FEAD, ou lorsqu'elles doivent répondre au contexte spécifique du soutien apporté. Toutefois, le modèle des enquêtes structurées doit être respecté et le sens des questions ne doit pas être modifié afin de permettre l'agrégation des résultats d'enquête au niveau de l'UE.
13. Envisager une **méthodologie solide pour l'agrégation et l'analyse des réponses** au niveau national afin de garantir la comparabilité des données au niveau de l'UE. La disponibilité de statistiques descriptives indiquant la répartition des réponses données par les différents types de soutiens et groupes cibles du FEAD suivis par des indicateurs de résultats permettrait une agrégation et une interprétation significatives des résultats d'enquête au niveau de l'UE.
14. **Remédier aux lacunes et incohérences identifiées** dans les données des enquêtes structurées **en utilisant des méthodes de recherche supplémentaires**, par exemple l'analyse des données brutes des enquêtes structurées, des groupes de discussion et des consultations avec les acteurs du FEAD au niveau national.

En plus des recommandations ci-dessus, l'équipe chargée de l'étude recommande les actions suivantes afin d'améliorer la collecte de données et les rapports sur les

programmes d'inclusion sociale du FEAD (programmes opérationnels de type II), en particulier, sur les indicateurs de résultats spécifiques au programme :

15. Fournir des **modèles unifiés** et une **méthodologie** pour la collecte de données auprès des bénéficiaires finaux, qui mesurent le résultat de l'intervention (par exemple, l'engagement dans divers types d'activités, l'utilisation de services, le changement de situation personnelle, etc. ;
16. Envisager la possibilité de **collecter des données sur les indicateurs de résultats spécifiques au programme à partir de registres administratifs** ou d'autres données collectées par les prestataires de services (par exemple, les services d'éducation et d'accueil de la petite enfance, les services de santé, les services d'emploi, etc. ;) lorsque cela est pertinent pour le type et l'objectif des activités d'inclusion sociale financées par le FEAD ;
17. Réaliser des **enquêtes auprès des bénéficiaires finaux et des prestataires/organisations partenaires** à différents moments de la mise en œuvre du programme. Ces enquêtes régulières réduisent le risque d'attrition, d'absence de réponse et de réponses biaisées, qui affectent les valeurs rapportées de l'indicateur spécifique au programme. Ces enquêtes régulières constituent également un élément pertinent de l'évaluation du programme national, le cas échéant.

Introduction

The **Fund for European Aid to the Most Deprived (FEAD)** is an instrument contributing to the Europe 2020 target to reduce poverty in the EU. Article 3 of the FEAD Regulation⁷ states that:

[the] Fund shall promote social cohesion, enhance social inclusion and therefore ultimately contribute to the objective of eradicating poverty in the Union by contributing to achieving the poverty reduction target of at least 20 million of the number of persons at risk of poverty and social exclusion in accordance with the Europe 2020 strategy, whilst complementing the Structural Funds.

Over the period 2014–2020, FEAD has a budget allocation of EUR 3.8 billion. FEAD assistance is implemented through **two types of OP**:

- a) **‘Food or basic material assistance operational programme’** (also referred to as ‘OP I’) means an operational programme supporting the distribution of food or basic material assistance (including clothes, hygiene items and other essential items for personal use) to the most deprived persons, combined where applicable with accompanying measures aimed at alleviating the social exclusion of the most deprived persons. OP I type is implemented in 23 Member States (MSs).
- b) **‘Social inclusion of the most deprived persons operational programme’** (also referred to as ‘OP II’) means an operational programme supporting activities outside of active labour market measures, consisting of non-financial, non-material assistance aimed at the social inclusion of the most deprived persons. OP II type is implemented in 4 MSs.

By **addressing the basic needs** of the most deprived people in the EU, FEAD provides the **preconditions** to improve the inclusion of target groups into society and mainstream services, e.g. by enabling them to **engage in training** or other activities supported by the ESF or other funding sources.

Monitoring is an essential component of FEAD, as a number of common input, output and result indicators must be reported annually by MSs. Also, MSs can use programme-specific indicators to monitor the implementation of FEAD programmes. In addition, for OP II, the programmes must include the expected results for the specific objectives of the OP and the corresponding programme-specific result indicators, with baseline and target values. **Comprehensive, proportionate, timely and accessible data collected by the national authorities** allows the assessment of progress in the implementation of FEAD programmes and the evaluation of the relevance, efficiency, effectiveness, coherence, and added value of the funding, while also respecting the dignity of the most deprived⁸.

The main objective of the **study supporting the monitoring of FEAD** was to **assess the data collection and monitoring systems of FEAD programmes at national level**, and to identify good practices for both Operational Programme types I and II (OP I and OP II) implemented during the period 2014-2020 in all participating MSs. The work carried out under this contract will enhance the understanding of the Commission and other stakeholders with regard to the functioning of the programmes’ monitoring systems, and will

⁷ Regulation (EU) No 223/2014 of the European Parliament and of the Council of 11 March 2014 on the Fund for European Aid to the Most Deprived

⁸ Article 5.14 of FEAD Regulation states that “The Commission and the Member States shall ensure that aid provided in the framework of this Fund respects the dignity of the most deprived persons”.

also provide an assessment of the collection of the monitoring data, following EU Better Regulation requirements⁹. It will **serve as the basis for the Commission’s ex-post evaluation of FEAD programmes** in the 2014-2020 programming period, and will provide useful input to MSs for the **improvement of their monitoring systems for the 2021-2027 period**.

This final report pulls together the results of the mapping of data collection methodologies and the assessment of FEAD monitoring systems’ data collection and data processing arrangements. The report presents the key findings on the data collection systems established for OP I and OP II type programmes, following the governing principles described in the Better Regulation Guidelines with regard to monitoring: comprehensiveness, proportionality, timeliness and accessibility¹⁰. In the context of the study, we adjusted the aforementioned monitoring principles to the national-level data collection systems that we examined:

- A **comprehensive** data collection system at national level must meet the requirements set by the FEAD regulatory framework, and should allow the collection, aggregation and reporting of data that are reliable, consistent and properly linked to the activities funded. The study analysed data collection systems aimed at both the collection of objective (i.e. factual, quantitative) and of subjective (e.g. opinion-based) evidence such as periodic or *ad hoc* polls and surveys.
- A **proportionate** data collection system allows the collection of sufficient data, and meets the requirements set by the FEAD regulatory framework without creating an unnecessary data collection burden, by concentrating only on the gaps that need to be filled.
- **Timeliness of data collection:** data collection systems at national level should meet the legal requirements of the FEAD regulatory framework, and allow the timely production and reporting of monitoring data.
- **Accessibility of data collection systems:** when analysing data collection system as one of the elements of overall monitoring framework, the study team focused on the accessibility of integrated or interoperable IT systems for data collection, and the protection of sensitive data.

Chapter 1 of the final report briefly presents **the methodological approach of the study**. It provides an overview of the desk research and interactions with the managing authorities and other FEAD stakeholders, including interviews, focus groups and the final workshop that was used to present and validate the key findings.

Chapter 2 presents the results of the assessment of data collection systems in MSs implementing **OP I type (food and material assistance) programmes**. It starts with an analysis of the **comprehensiveness and proportionality of data collection**, including an overview of FEAD implementation and data collection arrangements for the OP I type; main data collection methods; the data quality checks in place; actors involved in the monitoring of FEAD programmes; and the IT systems and tools used for data collection. Further to this, it provides an assessment of the timeliness and accessibility to POs of integrated or interoperable IT systems on OP I type programmes, as well as the protection of data.

⁹ However, the study cannot replace audits of FEAD implementation and monitoring systems, as no on-the-ground checks of FEAD monitoring systems were implemented during the study. As a result, this study does not allow conclusions to be made as to the reliability of the data reported by Member States.

¹⁰ Better Regulation Guidelines on Monitoring: <https://ec.europa.eu/info/sites/info/files/better-regulation-guidelines-monitoring.pdf>

Chapter 3 presents the results of **the analysis of data collection arrangements for OP II type (social inclusion) programmes**. It is structured in accordance with the principles of data collection comprehensiveness, proportionality, timeliness and accessibility to POs of integrated or interoperable IT systems, as well as the protection of data.

Chapter 4 presents identified examples of **good practice in data collection** on OP I- and OP II type programmes, and delineates the conditions for the transferability of each good practice.

Conclusions and recommendations present the **key findings** of the assessment for **OP I and II types, and provide recommendations for the improvement of FEAD data collection systems at national level.**

1. Methodological approach

To assess FEAD monitoring and data collection methodologies at national level, the study team conducted thorough **desk research at EU and national level**, exploratory interviews at EU level, and **interviews with the managing authorities** at national level. The information about FEAD monitoring and data collection systems collected by the study team covers all 27 MSs. It should be noted that the FEAD operational programme for the United Kingdom was never implemented; thus, it was excluded from the data collection exercise at national level¹¹.

To collect additional information and refine hypotheses regarding the strengths, weaknesses and success factors of different FEAD data collection systems, **two focus groups** were organised with FEAD managing authorities (MAs) and partner organisations (POs). Lastly, the key findings of the report were presented and validated during the **workshop with the main FEAD stakeholders** at EU and national levels.

Desk research

As the first step in their desk research, the study team collected all the relevant information available from SFC2014. This included the texts from the FEAD Operational Programmes, Annual Implementation Reports (AIRs), audit and evaluation reports, as well as summaries of the results of structured surveys. These documents were reviewed and analysed by the core team as an initial step in its desk research at national level. For the next stage, the national experts further analysed EU and country-specific documents (including legal acts, guiding materials, monitoring rules, etc.) in order not to burden the MAs with excessive information requests during their interviews.

The core team prepared the instructions and tools to be used by the national experts for information collection. Tailored information collection sheets were prepared for all FEAD OPs, in which each record was used to gather information about a single common or programme-specific indicator of the relevant programme. A high level of consistency between national experts' contributions was ensured by the detailed guidelines for data collection and continuous coordination by the core team, which acted as a helpdesk during all phases of the study.

Interviews with the managing authorities

During the interviews with the MAs, the team aimed to fill in information gaps on the FEAD monitoring and data collection systems. The national experts followed a semi-structured approach, i.e. a standard list of questions was asked along with other, specific questions relating to the subject matter. The interviews took place between August and October 2021, and explored specific aspects of the FEAD data collection systems through the use of open-ended questions, which left room to explain the specific context and implications for the monitoring of the programme. After the interviews, the country experts examined additional supporting documentation mentioned by the respondents (if any), such as guides on the compilation of indicator data, in cases where these had not been found or analysed during the initial desk research.

¹¹ According to the information collected by the study team at EC level, the decision of the UK not to implement the FEAD OP was not linked to FEAD reporting requirements. It was based on the fact that the amount of funding the UK could access for a programme focused on social inclusion activities and mental health support would not enable the UK to deliver the programme as it had originally been envisaged. It is for this reason that the UK has decided not to continue with the application process for FEAD UK.

The interviews were also used to gather suggestions as to good practices in relation to FEAD monitoring in each Member State. During the interviews, the representatives of the MAs shared valuable primary data about the various data collection methodologies, the main strengths and weaknesses of the approaches applied, and solutions to overcome challenges related to the monitoring of the implementation of FEAD funded programmes.

Focus groups

To broaden and deepen their understanding of FEAD monitoring data collection and reporting systems at national level – in particular, how they work in different contexts and for different groups – the study team arranged **two virtual focus groups** involving representatives of the **MAs, beneficiaries** and **partner organisations** in the MSs. These focus groups were conducted on **14 and 15 October 2021** using the MS Teams platform.

Separate focus groups were arranged to discuss different data collection methods applied for the monitoring of FEAD. The first group of participants mainly represented and discussed the monitoring of FEAD using data based on counting and registers. The second focus group was dedicated to presenting and discussing experiences in relation to FEAD monitoring based on informed estimates and surveys of end recipients.

These targeted focus groups were intended to complement the in-depth interviews carried out with the MAs in terms of identifying examples of good practice in FEAD monitoring and data collection methods. While the interviews enabled discussions about the MAs' experiences, the focus groups – which involved representatives from multiple countries and actors involved in FEAD monitoring – enabled the study team to draw out patterns of similarities and differences between countries. They allowed the team to gather a much wider range of opinions regarding the different aspects of data collection and reporting in the context of FEAD monitoring.

Workshop with FEAD stakeholders

The main objective of the workshop with FEAD stakeholders was to present and validate the interim findings on monitoring data collection methods, and to further develop the recommendations for the 2021-2027 programming period. The workshop also aimed to collect additional data for the research by involving various FEAD stakeholders in the discussion.

The workshop with FEAD stakeholders took place virtually on the 11 January using the MS Teams platform, and was attended by representatives of the MAs, intermediate bodies, beneficiaries and the main POs at national level, as well as by EC officials and representatives of EU-level umbrella organisations such as FEBA, the Red Cross and Caritas. The MAs from Finland, Greece, Lithuania, the Netherlands and Sweden presented their practices with regard to FEAD monitoring and data collection systems in the 2014–2020 programming period, as well as novelties relating to FEAD implementation and monitoring for the 2021–2027 programming period. All participants in the workshop could share their opinions during the online discussion, either in the event's live chat or by providing their answers to the questions using the Slido tool.

The study team used the information gathered during the workshop, in combination with the main outcomes of the discussion with FEAD stakeholders, to review the draft final report and further develop recommendations for the improvement of FEAD data collection systems at national level.

2. Data collection systems for FEAD OP I type programmes

FEAD-funded OP I type programmes focus on **food distribution** and **basic material assistance** to the most deprived persons. Food is distributed in the form of either packages or meals. In addition to the food purchased, FEAD also supports the transportation and distribution costs of donated food. As well as food, these programmes also deliver basic material assistance in the form of school supplies, hygiene items and other essential items for personal use. The type I OP is widespread across the EU, with 23 out of the 27 MSs implementing this type of OP. Under this type of OP, MSs also provide **accompanying measures** to complement the provision of food and material assistance aid with guidance and referrals to social inclusion support.

The **monitoring and evaluation of OP I programmes** rely on input indicators, as well as common output and result indicators, all of which are reported to the EC in the Annual Implementation Reports. In addition, the MAs of OP I type programmes are required to carry out structured surveys of end recipients in 2017 and 2022, following the template adopted by the Commission. MSs can also use programme-specific indicators or *ad hoc* surveys to monitor and assess different aspects of FEAD support.

2.1. Comprehensiveness and proportionality of data collection systems

Key monitoring provisions are stipulated in the FEAD Regulation, In particular, Article 19 requires that:

In order to monitor the progress of implementation of operational programmes, Member States should draw up and provide to the Commission annual and final implementation reports. This should ensure the availability of essential and up-to-date information for those operational programmes.

The FEAD regulatory framework establishes an obligation for the MSs to annually report the data on **common monitoring indicators (see Annex I)**. However, the collection of monitoring data at national level must take into account the specific need to protect the dignity of the individuals supported by FEAD, and must be arranged with a view to reduce to the minimum the administrative burden on beneficiaries. Delegated Regulation (EU) No 1255/2014 establishes that the values of certain indicators shall be determined on the basis of informed estimation by the POs, rather than information provided by end recipients¹².

The EC Guidance fiche 'Monitoring under FEAD'¹³ establishes that in order to reduce the administrative burden, the following common indicators may be reported on the basis of informed estimates (e.g. using sampling approaches):

- Output indicators on the number of meals, the number of food packages distributed, and the share of FEAD co-financed products in the total volume of food.

¹² Commission Delegated Regulation (EU) No 1255/2014 of 17 July 2014 supplementing Regulation (EU) No 223/2014 of the European Parliament and of the Council on the Fund for European Aid to the Most Deprived by laying down the content of the annual and final implementation reports, including the list of common indicators

¹³ Guidance fiche. Monitoring under FEAD (2015). https://circabc.europa.eu/sd/a/33ea5742-ee71-47b0-a889-21d4993087c4/FEAD_06_Draft_guidance_note_on_monitoring_and_indicators_under_FEAD-final.pdf

- Result indicators on end recipients, particularly indicators 14 (d), (e) and (f), which relate to migrants, participants with a foreign background, minorities, people with disabilities and homeless people; these indicators shall be based on MSs' national definitions, whereas those relating to age or gender are considered to be self-explanatory.

Also, if an OP I type programme does not specifically target migrants, participants with a foreign background, minorities, people with disabilities and homeless people, and if the MA deems that the POs would not be able to estimate the value of one of these indicators by any justifiable means, they may waive the reporting on the respective indicator. However, if these groups are specifically targeted, the value of these indicators shall be reported¹⁴.

MAs are required to document the methods used and accepted. However, taking into account the characteristics of the interventions, the collection and storage of individual data is not required for reporting to the Commission.

In the following sub-chapters, we provide an overview of data collection arrangements at national level in MSs implementing OP I type programmes, and present the results of our analysis of data collection in accordance with the principles of comprehensive and proportionate data collection, and the timeliness and accessibility of data.

2.1.1. Data collection arrangements at national level

In the 2014-2020 programming period, Regulation (EU) No 233/2014 supplemented by the Commission Delegated Regulation (EU) No 532/2014 and the Commission Implementing Regulation (EU) 2015/212, together established several basic requirements for FEAD monitoring systems, in terms of:

- the list of data to be recorded and stored in the computerised form in the monitoring system;
- the coverage of the data;
- minimum requirements for data processing;
- data storage (storage of data at operation level, individual participation records in electronic form – i.e. microdata, personal data protection, general data security);
- data transmission to the Commission (electronically via the SFC platform);
- reporting requirements (AIRs, input to SFC2014); and
- dissemination at national level (ensure AIRs are accessible to the public).

For both OP I and OP II, Commission Delegated Regulation (EU) No 532/2014 establishes the minimum requirements for the audit trail. These require a reliable and documented system for collecting, recording and storing data for monitoring, evaluation, financial management, verification and audit purposes. Furthermore, “the audit trail shall allow data in relation to output indicators for the operation to be reconciled with reported data and result and, where appropriate, targets for the programme” (Article 3(i)). However, the Regulation and delegated act do not require the personal identification of end recipients; only aggregated figures are required. In addition, the audit trail excludes the end-beneficiary level, except in a limited number of cases (e.g. fraud).

¹⁴ Ibid.

To encourage a more unified and consistent approach to the monitoring of FEAD, the EC services have also prepared and published a guidance fiche¹⁵ providing explanations and interpretations of the monitoring requirements set by the FEAD regulatory framework. However, both the legal framework and the guidelines leave room for MSs to decide on the practical arrangements for the collection, processing and reporting of monitoring data at national level. This has resulted in a variety of data collection systems being developed by MSs that reflect the different approaches to the delivery of FEAD assistance and the specific features of national support schemes and implementation modes.

Implementation arrangements across OP I type programmes allow for the clustering of FEAD operational programmes based on the approach used to decide eligibility for FEAD support, the number of POs and beneficiaries involved in the delivery of FEAD assistance, and the IT systems and tools used for the data collection, reporting and monitoring of implementation (see Table 1). Most MSs apply a **top-down approach** to decide on the eligibility of materially deprived persons for FEAD support. In these cases, the eligibility criteria are set by the MA at national level and are usually based on the precondition that the eligibility of a person or a household is based on whether or not they are included in national social assistance / minimum income support schemes.

On the other hand, several MSs (AT, BE, FI, FR, IT, LU) apply a **bottom-up approach** to the implementation of FEAD Ops, in which eligibility for support is identified at regional and/or local level, or at the discretion of the partner organisation directly involved in the distribution of food and material support. In most cases where FEAD OP implementation relies on a bottom-up approach, no specific proof of eligibility is required from recipients of support. Furthermore, in Belgium, Finland, France, and to some extent in Italy, FEAD end recipients are not asked for **proof of identity** (personal ID number or other documentary proof) in order to be eligible for FEAD support.

Another important feature of FEAD implementation arrangements is the **number of partner organisations and beneficiaries** involved in the distribution of support and, accordingly, in monitoring data collection and reporting. In Belgium, Bulgaria, Ireland, Italy, Spain, Poland, Portugal and Romania, multiple and diverse POs and beneficiaries distribute FEAD support and generate primary data used to monitor FEAD implementation. In other countries, the number of POs varies from small (1-5) to moderate (60-70). In this context, the IT systems and other tools used for the monitoring of implementation and reporting data in relation to FEAD support are also important. These differ between MSs, ranging from the paper forms used by some front-line organisations and POs (e.g. in PL) and data submitted by e-mail (spreadsheets or scanned documents) to cloud-based solutions (BE), interoperable IT tools (IT) and comprehensive e-cohesion systems (BG, GR, LT, and others) that are partially or fully accessible to organisations involved in the implementation and monitoring of FEAD.

Table 1. Implementation arrangements for FEAD OP I type programmes

MS	Eligibility for FEAD support	Bottom-up/top-down approach	Number of POs and beneficiaries involved	IT systems and tools in place
AT	Households living in material deprivation (schoolchildren)	Bottom-up approach	Small (1)	Comprehensive e-cohesion ¹⁶ system

¹⁵ The European Commission, Guidance fiche: Monitoring under FEAD. Brussels, EMPL A3/SLG/JM (2015).

¹⁶ E-cohesion IT systems allow for all-electronic exchange of information between beneficiaries, managing authorities, certifying authorities and audit authorities.

STUDY SUPPORTING THE MONITORING OF FEAD – DATA COLLECTION SYSTEMS IMPLEMENTED
BY MEMBER STATES

MS	Eligibility for FEAD support	Bottom-up/top-down approach	Number of POs and beneficiaries involved	IT systems and tools in place
BE	Persons in need of food support	Bottom-up approach	Large (~750)	Cloud-based spreadsheets, communication between POs and MA
BG	Persons in need of food support and material assistance	Top-down approach	Large	Comprehensive e-cohesion system
HR	Persons in need of food support; schoolchildren, low-income households, homeless	Top-down approach	Moderate	Comprehensive e-cohesion system
CY	Children, low-income families	Top-down approach	Small	Comprehensive e-cohesion system
CZ	Schoolchildren from low-income families	Top-down approach	Large	Comprehensive e-cohesion system
EE	Recipients of social benefits	Top-down approach	Small (1)	Ongoing implementation of e-cohesion system
ES	Persons in need of food support	Top-down approach	2 POs coordinating a large number of beneficiaries (5,633 in 2020)	Ongoing integration into the national ESF+ IT system
FI	Persons in need of food support	Bottom-up approach	Medium (22)	The first level of implementation (beneficiaries) submit data by e-mail.
FR	Persons in need of food support	Bottom-up approach	Small (4)	Ongoing implementation of e-cohesion system
GR	Persons living in deprivation	Top-down approach	Moderate (57)	Comprehensive e-cohesion system
HU	Children, homeless	Top-down approach	Small (3)	The first level of implementation (beneficiaries) submit data by e-mail.
IE	Persons living in deprivation	Bottom-up approach	Large (158)	Comprehensive e-cohesion system
IT	Persons living in deprivation	Bottom-up approach	Large (10022)	Ongoing implementation of e-cohesion system
LV	Persons living in deprivation	Top-down approach	Moderate (26 in 2021)	E-cohesion functionalities available only for the intermediate body, MA, CA and AA.

MS	Eligibility for FEAD support	Bottom-up/top-down approach	Number of POs and beneficiaries involved	IT systems and tools in place
LT	Persons living in deprivation	Top-down approach	Moderate (60 municipalities and 2 NGOs)	The e-cohesion system developed, not fully used by the POs
LU	Disadvantaged and vulnerable individuals or households as established by the social service organisations	Bottom-up approach	Small (5)	E-cohesion system with limited information exchange and report generation capacities.
MT	Persons in need of food support	Top-down approach	Small (1)	Comprehensive e-cohesion system, complemented by paper-based communication
PL	Persons in need of food support	Top-down approach	4 POs coordinating many beneficiaries	Paper-based communication on first and second level of implementation
PT	Persons in need of food support	Top-down approach	Large (~600)	Comprehensive e-cohesion system
RO	Persons in need of food support, disadvantaged and vulnerable individuals, children affected by or at risk of poverty	Top-down approach	Large (3,185)	Comprehensive e-cohesion system
SK	Materially deprived persons	Top-down approach	Moderate (67)	E-cohesion system with limited information exchange and report generation capacities.
SI	Persons in need of food support	Top-down approach	Small (2)	POs have their own IT systems, MA enters data manually in other governmental systems.

Source: compiled by the authors, based on desk research and the information collected by country experts.

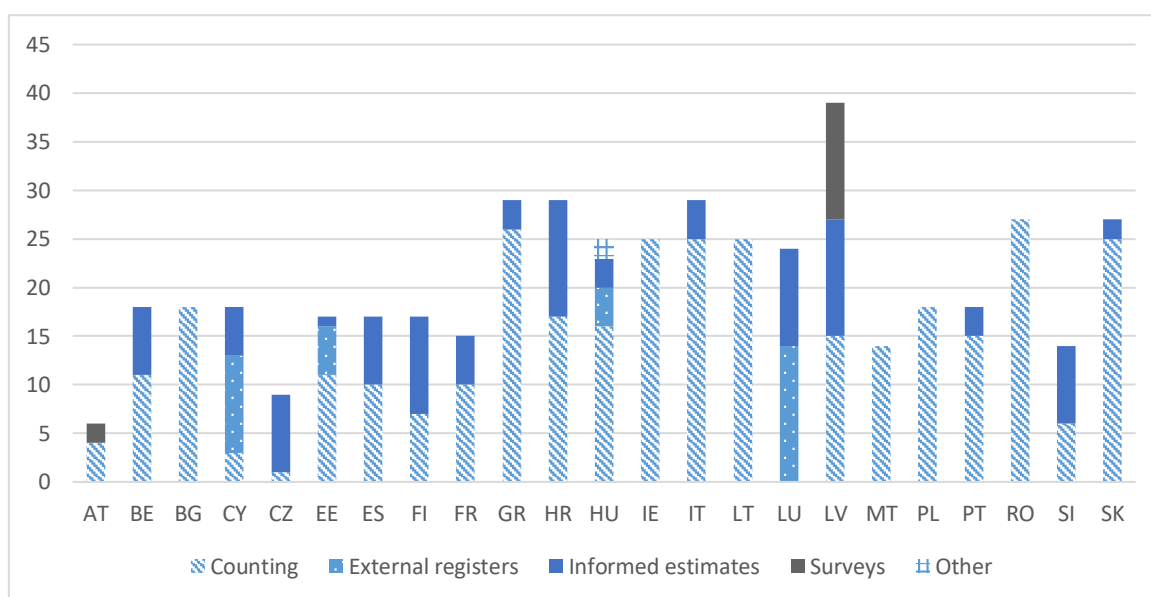
The implementation arrangements for FEAD OPs presented in Table 1 are directly related to the methods and procedures used for data collection and reporting on FEAD common output and result indicators, which are in detail presented in the next sub-section of the report.

2.1.2. Collection of data on common indicators

2.1.2.1. Data collection methods

The mapping of data collection methodologies at national level showed that **counting** is the most common method of data collection across the majority of the output and result indicators of OP I type programmes. The values of all output and result indicators from FEAD-funded OPs in Bulgaria, Ireland, Lithuania, Malta, Poland and Romania are reported exclusively on the basis of counting. Other MSs apply approaches that are based on a **mixture of data collection methods** (see Figure 1).

Figure 1. Data collection methods for output and result indicators, OP I



Source: compiled by the authors, based on information collected by country experts and cross-checked with FEAD MAs in the MSs.

The analysis of quantitative and qualitative information concerning data collection methodologies at national level shows that **counting** is mainly used to generate the monitoring data on **common output indicators**, i.e. quantities of different food categories, the total number of food packages and meals distributed, as well as the monetary value of the support distributed. Values of **common result indicators** are usually **counted** when FEAD support is distributed on the basis of ex-ante generated lists of eligible end recipients registered in national social benefits IT systems. Thus, counting is mostly used to collect data on FEAD end recipients when MSs apply a **top-down approach** to FEAD OP implementation, have *ex-ante* set eligibility criteria for FEAD support that relate to national social assistance schemes, and **require personal identification** from end recipients in order to receive FEAD support. Often, these FEAD implementation systems involve regional and municipal institutions as POs, or a limited number of non-governmental partners are in charge of reporting the monitoring data to the MA. Also, MSs that rely mainly on counting have usually developed comprehensive IT systems and tools to collect, process and store FEAD monitoring data.

Informed estimates are mostly used to generate **data on FEAD end recipients** (i.e. common result indicators) when MSs apply a bottom-up approach to FEAD OP implementation (e.g. in BE, FI, IT, FR), and FEAD support is distributed via a network of non-governmental front-line organisations providing food and material support to the most

vulnerable groups. Usually, **the recipients of support do not need to provide personal details and proof of eligibility** in order to receive FEAD support.

In **Italy**, for example, in the case of frequent users of FEAD assistance (benefitting for longer than six months), data is collected by opening a separate file with information including the recipient's name, surname, household composition and other data, based on self-reporting. However, for non-frequent users (mostly homeless persons), data is gathered during the first distribution using informed estimates and uploaded on SIFEAD in real time. The data collected are later divided by the number of months during which the distribution took place, and an average value is obtained. The MA then combines this value with qualitative data collected during the distribution. Normally, the percentage of non-frequent users is below 40 per cent.

In addition, some MSs that apply a mainly top-down approach to FEAD implementation use informed estimates to report on the end recipients and their sociodemographic characteristics (e.g. CZ, ES, LV, LU, HR, SI).

In some cases, **informed estimates** are used to collect data on the following **common output indicators** with regard to food support:

- the quantities of different types of products used to prepare **school meals** in the Czech Republic and Cyprus¹⁷;
- **the proportion of FEAD co-financed food products** in the total volume of food distributed by the POs in Finland and Greece;
- the **total number of meals** distributed in Finland and Greece; and
- the **total number of food packages** distributed partly or totally financed by the OP in Finland, Greece and Slovenia.

As a method of generating data, estimates are often based on educated guesses made by the volunteers and staff of POs (in Belgium); the extrapolation of data registered on a sample of distribution days (in Finland); the extrapolation of data collected by a polling firm (France); and calculation methodologies based on historical data (estimation of the number of meals in Greece).

In Cyprus, Estonia, Hungary and Luxembourg, **external registers** are used to generate the data on FEAD end recipients:

- in Cyprus, the partner organisation inputs data in the platform on which all students receiving FEAD support are registered. These data are then reported;
- in Hungary, the national social benefits register (STAR) is used to generate the initial list of eligible end recipients and to estimate the socio-demographic characteristics of the actual end recipients who received FEAD support;
- in Estonia, data on FEAD end recipients are estimated, based on the list of persons who are eligible for food support, which is obtained from social benefits registers.

Analysis of data collected for the study shows that national social benefits registers are also used in some other MSs (e.g. Greece, Lithuania, Latvia and Malta); however, this is only as

¹⁷ The delegated act does not specify that these indicators are allowed to be based on informed estimates. In CY, the total quantity of food distributed (COI11) is the sum of indicators 4,5,6, and 8 for different categories of food that are estimated by partner organisations. Data are collected through the applications submitted by the beneficiaries, as well as from statements/reports/lists/databases maintained by the partner organisations.

a source to identify eligibility for FEAD support and to retrieve details about them in terms of the age, gender and other sociodemographic characteristics of actual FEAD end recipients, who are counted (in Lithuania and Malta) or estimated (in Latvia) by POs. In addition, data from external registers are used to cross-check data on FEAD end recipients that are generated and provided by POs using estimation (e.g. in Latvia).

Other data collection methods reported by Hungary include the use of a combination of the above approaches to identify how many people from each of the different target groups benefit from FEAD support. While external registers are generally used to report data on FEAD end recipients, the numbers of homeless persons and persons aged 65 and above have been estimated when delivering FEAD support in the form of prepared meals targeting homeless people.

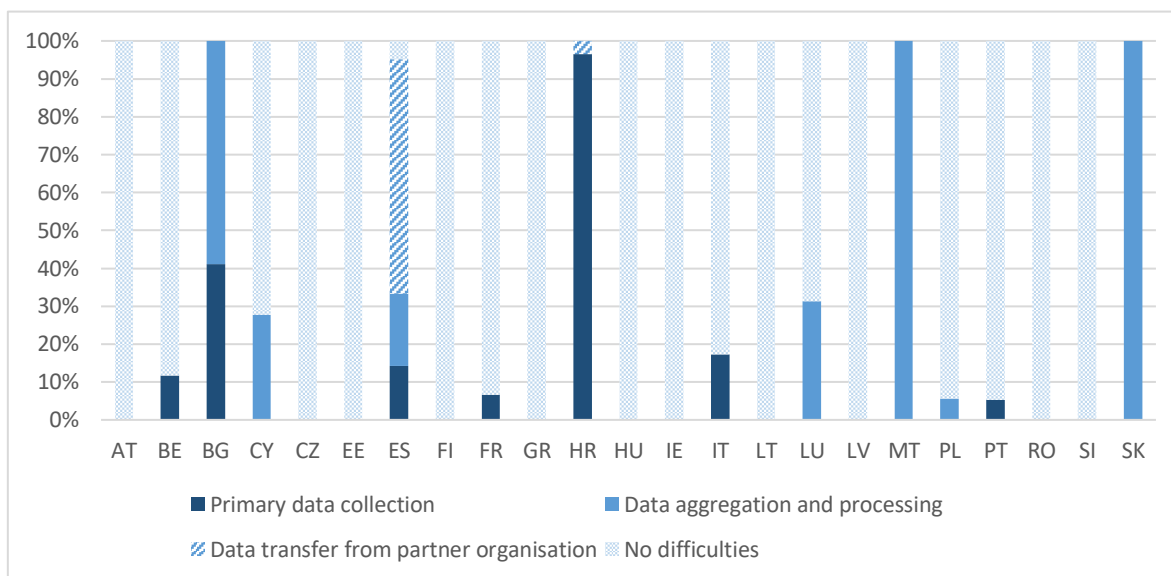
Using informed estimates to report the numbers of homeless in Hungary

In Hungary, a special project is dedicated only to the homeless, to whom all the warm meals distributed under the Operational Programme are provided. For this reason, no overlapping of reporting is possible between different target groups in Hungary, and the knowledge and experience of the Public Foundation for the Homeless (HKA), which runs the project together with 84 POs, ensures the ease of data collection. Even though identity documents are requested from homeless persons, in many cases, they cannot present any. In such cases, the representatives of the partner organisation record their names and birth dates based on self-declaration. Gender, disability and foreign background status are reported on the basis of estimation by staff.

Lastly, in Austria, **surveys** are used to collect primary data on the common result indicators relating to the socio-demographic characteristics of the end recipients of FEAD-funded material assistance: the number of women and the number of migrants, participants with a foreign background, minorities (including marginalised communities such as Roma) who receive material assistance in the form of school bags, stationery, exercise books, pens, painting equipment and other equipment required in school. Annual surveys of end recipients are also conducted in Latvia to collect data on socio-demographic characteristics, to validate estimates by POs, and to gather additional insights on the relevance of FEAD assistance.

Our analysis showed that in 11 countries, reporting on FEAD OP I type programmes presents no difficulties at all, whereas the other 12 countries encountered varying degrees of difficulties in reporting (see Figure 2). The challenges identified by country experts related mainly to primary data collection (BG, HR; to a lesser extent in BE, ES, FR, IT and PT) and data aggregation and processing (BG, SK; to a lesser extent CY, ES, LU and PL). In Spain, difficulties were identified in the transferring of data from POs. These were mainly due to multiple front-line organisations (the second-level POs) that report data to the first-level POs – the Spanish Food Bank Federation and the Spanish Red Cross.

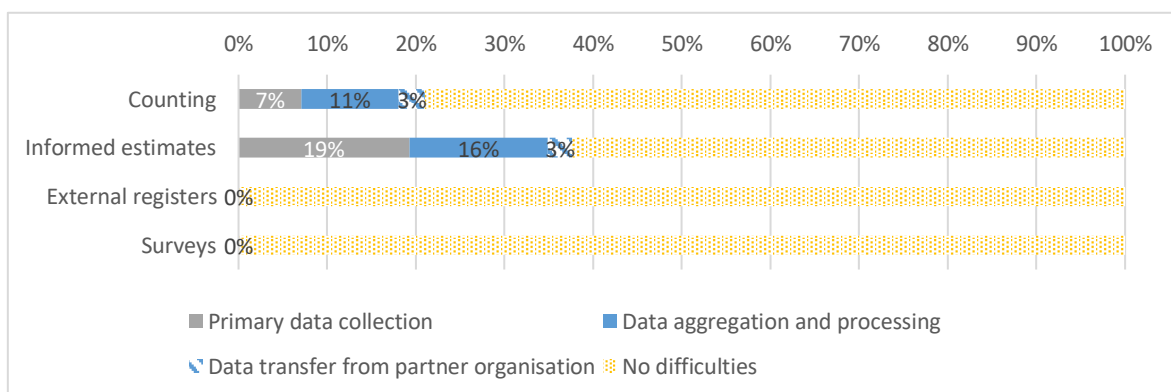
Figure 2. Difficulties in reporting FEAD output and result indicators of OP I type programmes



Source: compiled by the authors, based on information collected by country experts and cross-checked with FEAD MAs.

The results of our analysis show that difficulties in data collection and reporting for the FEAD OP I indicators relate to the data collection methods used. Primary data collection is seen as more complicated and challenging when informed estimates are used (see below). Both the aggregation and processing of data, as well as data transfer from the POs, cause reporting difficulties in cases where data on indicators are generated using counting or informed estimation. For common input and result indicators that are reported on the basis of data from external registers and surveys, no difficulties were identified (see Figure 3).

Figure 3. Difficulties in reporting FEAD output and result indicators, by data collection method



Source: compiled by the authors, based on information collected by country experts and cross-checked with FEAD MAs in MSs.

When **counting** is used to collect data on FEAD OP I type implementation, the challenges identified by the MAs mainly relate to the various levels of data aggregation and processing. These include the format of data reported, a **lack of IT tools accessible to partner organisations**, the timeliness of data collection and reporting, and the administrative burden to POs. These challenges in terms of data aggregation and processing were equally relevant to OP I type indicators reported on the basis of **informed estimates**.

Analysis of qualitative information gathered during the interviews and focus group discussions shows that **informed estimates** are difficult for POs where they are estimating the amounts of different types of food distributed, as well as some of the common result indicators for FEAD end recipients belonging to sensitive target groups such as migrants, participants with a foreign background, minorities, and persons with disabilities:

- In Belgium, the interpretation of the definitions of the common result indicators on the number of migrants supported, as well as participants with a foreign background and minorities (including marginalised communities such as the Roma) is considered problematic, as the POs often do not know how to report on persons with **overlapping citizenships**.
- In Italy, reporting on the common **result indicator on persons with disabilities** was identified as challenging, as volunteers from POs found it difficult to determine whether the end recipients had disabilities, according to the national legislation.
- In France, data on FEAD end recipients such as migrants, participants with a foreign background, minorities and persons with disabilities are neither collected nor estimated as this is **legally forbidden**, due to the sensitivity of these personal details. Accordingly, data on these FEAD end recipients are not reported in annual implementation reports;

Reporting on **the number of homeless persons** who received FEAD support is also regarded as problematic. According to OECD and FEANTSA estimates, around 700,000 people in the EU were homeless¹⁸ in 2020. However, the number of homeless persons who received FEAD support reported by France was more than one million in 2015; around 673,000 in 2018 and almost 736,000 in 2019. In Italy, the reported number of homeless persons supported was also high. In 2015, 2016 and 2018, it exceeded 100,000 persons, while in 2017 more than 200,000 were reported. However, estimates made by the OECD on the basis of the latest available data show substantially smaller total number of homeless in these countries (see Table 2). It is admitted that homeless estimates across Europe is difficult, as countries do not define or count their homeless populations in the same way. However, the trade-off between the numbers of homeless persons reported in FEAD AIRs and estimates of homelessness in the EU may also be a result of **overestimating and/or double-counting FEAD end recipients**, especially when no identity proof is required in order for them to be eligible for support.

Table 2 – Reporting on FEAD support to homeless persons

Member State	Number of homeless reported in FEAD AIRs 2019	Estimated number of homeless persons (OECD, 2020)	Year of latest available data on homelessness
BE	19,823	NA	-
BG	55	NA	-
CZ	10,207	23,830	2019
EE	1,000	864	2011
ES	25,345	22,938	2013
FI	2,672	5,482	2018

¹⁸ OECD Affordable Housing Database <https://www.oecd.org/els/family/HC3-1-Homeless-population.pdf>

FR	735,762	141,500	2012
GR	4,456	21,216	2009
HR	119	462	2013
HU	12,418	10,068	2014
IE	30,665	5,873	2020
IT	68,910	50,724	2014
LT	226	857	2011
LU	69	2,059	2014
LV	875	6,877	2017
PL	22,799	30,330	2019
PT	21	7,107	2019
SI	2,356	3,799	2019
SK	4,216	23,483	2011

Source: SFC2014 data, OECD Affordable Housing Database <https://www.oecd.org/els/family/H3-1-Homeless-population.pdf>

Although they are only used to a limited extent as a data collection method for the monitoring of FEAD OP I programmes, **surveys** do not cause difficulties when used for primary data collection (AT, FR). As an additional tool to cross-check the data reported by POs (LV), surveys impose additional costs on FEAD implementation, but allow the collection of data beyond the required monitoring indicators, e.g. on the relevance and effects of FEAD support.

The use of **external registers** is considered a straightforward and easy way to generate monitoring data and cross-check the data collected using other methods (counting or informed estimates). No difficulties were identified when using external registers to generate monitoring data. Although the use of external registers to cross-check data reported on the basis of counting or informed estimates may increase the administrative costs of the programme (unless these checks are automated), it does contribute to the reliability of the monitoring data reported to the EC.

2.1.2.2. Checking data quality

To assess the comprehensiveness of data collection systems at the national level, the study team analysed the processes of data collection, aggregation and reporting aimed at the quality of data reported to the EC in Annual implementation reports. Information collected for this study does not allow us to specify actual shortcomings of data quality, as this would require on the ground audits. However, based on the desk research and interviews with the MAs, main strengths and weaknesses relating to the quality of FEAD monitoring data were identified.

Analysis of data collected during the interviews with the MAs showed that errors in data on indicators reported by POs and beneficiaries were rare in Cyprus, France, Lithuania, Latvia,

Malta, Poland, Portugal and Slovakia. Other MSs reported that despite guidance and support being provided to POs by the MAs, certain errors kept reoccurring in the data reported by POs and beneficiaries to the MAs. The most significant errors detected by the MAs related to the **double counting of end recipients** and **over-reporting on the total number of persons** supported. The evidence gathered for the study shows that the problem of double counting is encountered more often by MSs which report the number of FEAD end recipients on the basis of informed estimates.

In Finland, for example, data concerning end recipients are collected at the level of local distribution centres, during sample distribution days. The numbers of end recipients reported by partner organisations and beneficiaries are estimate-based and cross-checked against the amounts of the food distributed. Such an approach can lead to possible double-counting of the result indicator, while the FEAD requirements stipulate that unique end recipients should be counted on an annual basis. In some cases, the reliability of the data may be also affected by the volunteering system used at a local level. According to the MA, data provided by volunteers could be improved by introducing additional training for newcomers on sensitive data collection.

Other recurrent reporting errors detected by the MAs included:

- duplication of records
- reporting separate instead of cumulative values (or vice versa)
- wrong use of decimal separators
- use of the wrong measurement unit
- other miscalculations and misinterpretations, especially where indicator definitions are not clear
- clerical errors

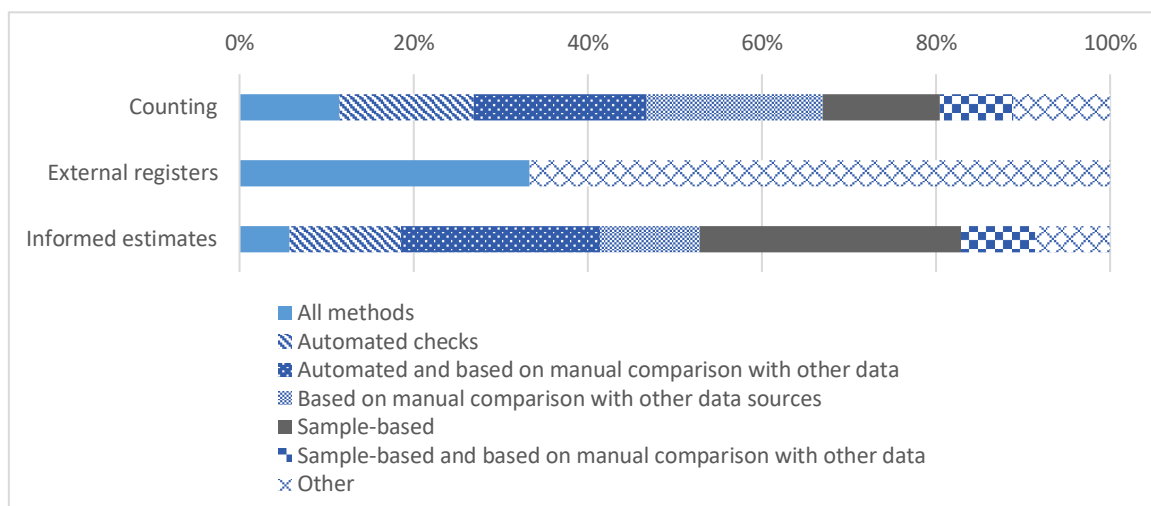
The main strength of the FEAD data collection systems currently used at national level is that they include data quality checks and control procedures that allow for the timely identification of reporting errors. Only two MAs informed the study team of data being wrongly reported to the EC, because errors had not been detected at national level:

- In Poland, during the last annual implementation report (for 2020), it was necessary to verify the value of the 'Total amount of eligible public expenditure' declared to the Commission, due to the use of an incorrect EUR / PLN exchange rate.
- In Slovenia, during the latest audit of the system, the Budget Supervision Office found inconsistencies in the data in the MOP-IS information system and the SFC. This was due to an error in entering data from the PO's reports. The error has already been corrected, and the MA has now established additional control over data entry.

Analysis of the information collected by country experts shows that the types of **data quality and plausibility checks** applied to verify the values of the common output and result indicators are split almost evenly between counting and informed estimation methods (see Figure 4). The most common type of data quality checks applied by the FEAD MAs were **automated checks based on comparison with or complementarity to other data**. For example, the automated check put in place by FEAD MA in Greece requires that each individual reported value for a distributed food package must be complemented by the signature of the end recipient on a tablet, in order for it to be accepted by the IT system. In other countries, the data reported on the number of end recipients and details of particular target groups are compared, either systemically or on an *ad-hoc* basis, against the data

available in the external registers (including national social assistance registers) or financial and historical data from FEAD implementation. All methods of checking data quality (i.e. automated, sample-based and those based on manual comparison with other data) and other methods (e.g. documentary checks and ‘four eyes’ quality control) are mostly used when the indicators rely on external registers (see Figure 4).

Figure 4. Percentage of common output and result indicators verified using different types of quality checks, OP I



Source: compiled by the authors, based on information collected by country experts and cross-checked with the MAs.

Although quality checks based on comparison with other data sources are more commonly used when counting is applied, data collection based on informed estimates also envisages automated checks and manual comparison with other sources. To verify the plausibility of the values reported, the MAs or intermediate bodies (IBs) conduct comparisons with data from external registers (Belgium, Lithuania, Latvia), historical data (Belgium), or sample-based documentary checks (Bulgaria, Cyprus, Estonia, Portugal, Slovenia). Other methods to ensure the quality and reliability of the reported data include the ‘four eyes’ principle (in which two independent checks on the same dataset are applied by the MA to check the values reported in the annual implementation reports), as well as discussions, clarifications and close collaboration with the POs during the data collection and annual reporting cycle (e.g. in Finland, Italy, France).

During the interview with the Greek MA, it was highlighted that checking the quality of data via **automated procedures** could be considered a good practice, as the data are extracted directly from computer systems in which individual data is processed automatically rather than manually. This leads to the greater final accuracy of the data. Quality checks based on **comparison with other data sources** are also reported to be an effective procedure for conducting quality checks, as they make it possible to easily correct reporting errors such as double counting. In Austria, **ex-ante automatic checks** are conducted on the names and birth dates of end recipients when they are entered into the data collection and reporting system. This prevents the possibility both of double receipt of FEAD support, and of double counting.

The Red Cross in **Austria** distributes **material assistance** on the basis of information shared by the authorities of regional states (to children of parents receiving minimum income). For each item distributed, the representatives of the Red Cross fill in a report in a database, with documentation being attached to this. The system does not allow information from identity documents to be shared with the partner organisation; however,

automatised plausibility checks may be carried out on the names and the birth dates of the intended end recipient. Furthermore, the system provides built-in audit trails and real-time exchange of data between the partner organisation and the MA. Reporting on the result indicators on gender, as well as minority and migrant status, is conducted by an externally contracted fully voluntary survey at the places of distribution, which provides for a strong correlation between output and result. The result indicator value is then extrapolated. The values for the result indicators on the total number of persons receiving basic material assistance and the number of children aged 15 years or under are counted by school officials.

Cross-checks of the informed estimates based on educated guesses and/or observation by POs and comparisons with other data sources (e.g. external registers or amount of support distributed) provide more robust and accurate data. For instance, in the case of Romania, when the number of end recipients was miscalculated, the MA compared the volume of products distributed to each PO with the data transmitted, and corrected possible mismatches using informed estimates. Miscalculations such as the double counting of end recipients can be spotted effectively using comparisons with data from national registers (e.g. social benefits or registers of residents in the MS).

The interview with the MA in **Belgium** revealed that the aggregated data collected by volunteers in the partner organisations are submitted to the European Commission only after systematic cross-checking with the data on the food delivered to the distribution centres. During the last two annual reporting cycles, no reporting errors were detected in the data reported by the POs. Previously, when the POs made reporting errors (such as double counting), the MA corrected them using an informed estimate based on a comparison with the volume of products distributed to each PO (which is based on the number of administrative registrations).

The **main weakness** reported in relation to the quality of data collection and reporting processes is **the lack of tools to automate data collection/processing, and integrate quality checks**.

In **Finland**, most indicators are counted by local distribution centres and their volunteers using MS Excel sheets through the partner organisations, who provide aggregated data annually. In this way, the collection of monitoring data does not add much administrative burden to the partner organisations. However, a lack of knowledge and skills on the part of volunteers might lower the quality of monitoring data. To ensure the quality required, partner organisations perform checks on the data provided by the local distribution centres, and the MA performs 'four eye' checks as well as manual follow-ups in cases where anomalies are visible compared with previous years, or there is a discrepancy between the food aid packages delivered to the partner organisation and the amounts distributed.

Compiling the reports takes time, as data come in to the partners from the local level, and only afterwards are passed on to the MA in Finland. Although the current system seems easy to manage, as the Excel sheets used can be aggregated and the administrative burden may be low, it can take quite a long time between actual implementation of FEAD-funded activities and confirmation of the reliability of the monitoring data to be reported in the AIRs. Frequent discussions with partner organisations contribute to the robustness and accuracy of the data, and are therefore considered a strength.

To summarise, the results of the desk research and the analysis of interview data show that the data collection and processing rules for data aggregation set at national level are sufficient to ensure the reliability of data reported in annual implementation reports, and that

they meet the requirements set down in FEAD Regulation. Data quality control and plausibility checks to verify the reported values at national level proved to be effective in identifying common reporting errors in the data submitted by POs and beneficiaries. However, the type and depth of quality checks and the proportionality of these arrangements in terms of administrative costs strongly depend on the functionalities of the IT systems and tools used for reporting. To reduce the risks of implausible data being reported, MAs set control procedures (automated, sample-based, 'four eyes'-based quality checks), arranged follow-ups, and held regular meetings with different actors involved in the collection and reporting of monitoring data (IBs, beneficiaries, POs, local/frontline organisations), released guidance and provided training to them.

2.1.2.3. Bodies responsible for the collection of data on FEAD support

The requirement in the FEAD legal framework to set out clear responsibilities and roles for the actors involved in data collection and transfer is being followed, and is well established across the different FEAD OP I type programmes. Based on the data collected by the study team at national level, **partner organisations** (POs) and **beneficiaries** provide most of the primary data on the common output and result indicators across OP I programmes.

The research showed that the quality and reliability of the data reported by POs and beneficiaries strongly depend on the **administrative capacity** of these actors, the **human resources** available to these organisations, and their **experience** both in delivering assistance to FEAD end recipients and in meeting the requirements relating to the distribution and monitoring of FEAD-funded support. The desk review of the annual implementation reports revealed that Hungary, Italy and Romania reported challenges in relation to the monitoring and collection of data on end recipients, and that a **lack of capacities in POs** affected the implementation of FEAD OP I type programmes.

Analysis of the information that was shared by interviewees from the FEAD MAs and participants in the focus group discussions shows that in cases where **data are collected and reported by volunteers in frontline organisations**, the MAs more often face difficulties relating to the regularity of reporting, delays in data collection, and the reliability of the data. The turnover of volunteers and staff in partner organisations poses an additional burden for the implementation and monitoring of operational programmes at the PO level, and may even cause the withdrawal of some smaller POs from FEAD support schemes. However, the evidence collected by the study team reveals interdependence between the administrative burden and the turnover of staff and volunteers in POs. According to experiences shared by representatives of POs during the focus group discussion, the administrative burden posed by national rules for implementation of FEAD (e.g. data collection being based exclusively on counting, submission of lists of end recipients with their signatures to prove the delivery of support) has resulted in the increased staff turnover in the POs (e.g. in Poland). Other food support and material assistance schemes with fewer administrative requirements to be followed (e.g. the redistribution of donated food, or food and other material assistance gathered during collection events at supermarkets) are less burdensome for POs in terms of accountability and monitoring requirements, as no identification of the persons receiving support is required.

Data collection, aggregation and reporting can also be expected to be more complex where **numerous and diverse organisations are involved**. The large numbers of partner organisations in some countries implies **varying degrees of understanding and capacities** to meet the requirements for the reporting documentation, even if the provisions are clear and there are standard reporting forms. In this regard, a very large number of POs – over 300 in each country – have carried out operations subsidised by FEAD since 2014 in the Czech Republic, Belgium, Bulgaria, Portugal and Romania. Our analysis shows that the capacity to monitor FEAD operations varies between POs as well as territorial affiliated

organisations. This can cause errors and a lack of accuracy in the data reported to the MA. In addition, small POs (e.g. in Italy, Poland) and those relying on the work of volunteers (e.g. in Finland, Belgium, Italy, France) face challenges relating to a lack of human resources as well as a lack of competencies to follow the data collection and reporting procedures set at national level.

Accordingly, MAs have made additional efforts to establish reporting systems and train the bodies and staff in charge of data collection, to ensure that all data aggregated and reported to the EC are reliable. For example:

- In Belgium, where only a few POs use centralised monitoring systems that allow real-time recording of data, most of the 750 POs use spreadsheets for data collection. A very small number even use paper forms to collect the data. The MA has developed a simple and inexpensive cloud-based reporting tool for POs to transfer to the MA their monitoring data via a web form, which can then be downloaded as an Excel file.
- In Bulgaria, a high level of uniformity is ensured by the municipalities that are involved as POs in FEAD implementation, which report the data via a single system (EUMIS).
- In Italy, top-level data about end recipients are collected in real time by POs via the centralised SIFEAD platform or by the POs' own decentralised IT systems, which have interfaces with SIFEAD for the transmission of data. For example, in 2018, the MA met periodically with the seven main POs and with the 199 leading POs to explain how to collect data via the SIFEAD IT system. The MA also provides technical assistance and further support to POs by offering guidance materials and organising meetings.
- In Portugal, all POs use the SIFEAC IT system, from their initial application to participate in FEAD onwards. The MA, together with the IB, developed a manual to explain how this IT system works and the different steps required to input and upload data. Specific training sessions were also organised for all POs.

To ensure the audit trail for FEAD implementation and the consistency and reliability of the data collected, guidance and user manuals on data collection and processing have been developed by the MAs. Across all OP I type programmes, programme guidelines or instructions on how the indicator data should be collected and calculated are available for 61 % of common output and result indicators¹⁹. These guidelines are reviewed and updated during programme's implementation to reflect changes in data collection tools and systems. Examples of guidance provided by the MAs include, but are not limited to, the following examples:

- In Belgium, the MA provides concrete examples on how to report indicators in accordance with to the FEAD legal framework, and special guidance regarding the structured survey. An e-mail address is provided for POs to contact in case of difficulties.
- In Greece, the MA prepared a 'Guide for Completing the Indicator Achievement Form' in February 2021, which replaced the earlier instructions for data collection. The guide provides precise information on how to extract information from the electronic databases, how to calculate the indicator values, and how to fill in the indicator achievement form.

¹⁹ Programme guidelines and instructions on data collection are not available in AT, EE, ES, FR, IE, MT, LT, SK.

- In Bulgaria, the MA approved manuals on the implementation of various operations, as well as rules for the collection, aggregation and reporting of indicators, including to the EC.
- In Lithuania, the national legal framework for FEAD implementation sets down requirements for the collection and reporting of data on monitoring indicators.
- In Romania, instructions are provided on the implementation of projects and the use of IT tools for reporting.
- In Finland, a reporting manual, an excel sheet for reporting at local level, and a monitoring handbook were provided to front line organisations.
- In Portugal, a manual on the electronic platform was provided to POs.
- In Italy, specific instructions on the reporting of indicators are available for POs.

Our analysis shows that the lack of guidance and/or user manuals for 39 % of output and result indicators can be explained by the fact that the rules on data collection have been set out in legal acts on FEAD implementation and funding requirements, and MAs do not see any need to develop additional guiding documents.

In addition to monitoring guidelines, the MAs organise meetings and training for beneficiaries and POs, to instruct and further support actors involved in FEAD implementation and monitoring. Examples include:

- Training for POs and annual meetings in Finland. In addition, if a local distribution centre encounters issues with reporting, they can either contact the MA directly or its coordinating PO;
- Seminars for POs and individual consultations upon request in Latvia;
- Periodical meetings and training for POs in Lithuania;
- Training for POs on the operation of the electronic platform and periodical meetings with main POs in Italy on the use of IT system SIFEAD.

Overall, the analysis of current FEAD monitoring arrangements for OP I type programmes shows that further strengthening of the administrative capacities of POs, e.g. through training, meetings, seminars, the development of simple and easy-to-use IT solutions as well as the provision to all partners involved of user guidance, contribute to the smooth and timely collection of data on FEAD monitoring indicators.

2.1.2.4. IT systems and tools for data collection

Information gathered by the study team shows that the main factors that affect the process of data collection and the comprehensiveness and the quality of the monitoring data itself relate to the **(IT) systems and tools developed** to facilitate data collection and processing, and **administrative capacities of actors** in charge of data generation.

In compliance with the FEAD legal framework, all MAs have developed electronic data storage systems, however, accessibility of these systems to POs varies between MSs. In some countries, direct access rights to these systems were granted to POs or interconnections were ensured with IT tools used by PO. In other MSs, reporting was organised mainly by sending Excel spreadsheets via e-mail.

On a scale from 1 (weak) to 10 (very good), MAs of FEAD OP I type programmes generally assessed the performance of current monitoring systems with a score of between 6 to 10. The main strengths emphasised by the MAs were the simplicity and reliability of the monitoring systems, including the IT systems and tools used (BE, FI, FR, HU); integration with national registers (e.g. BG, EE, GR, LT, LV, PT); and reporting functionalities (e.g. GR, PT, IT). The main weaknesses mentioned by the MAs were limited functionalities, outdated IT solutions, difficulties experienced by POs in using digital solutions and the integrated IT system for FEAD-funded and national food support schemes (see Table 3).

Table 3. Self-assessment of FEAD monitoring systems and tools by the managing authorities

MS	Self-assessment by the MA (1 = weak, 10 = very good)	Qualitative remarks from the MA
AT	8	"In principle, this database works well and provides for everything needed, but it is considered a bit cumbersome, and its usability could be improved."
BE	7-8	"A simple and efficient system composed of the web form and Excel files."
BG	10	"The system allows for the automatic generation of the information needed for the elaboration of the AIRs and the final report of the programme, information at project level for the needs of the certification and audit, etc. The system is connected to other systems which allow for cross-checks, reducing the possibilities of technical mistakes."
CY	8	-
EE	7	"The system is working, but a great deal is based on trust and cooperation."
FI	8	"The system is easy to manage, as there are Excel sheets that can be aggregated. The administrative burden is quite low. However, it takes time to compile the reports, as they come in from the local level to the partners, and only afterwards to the MA."
FR	7	"The system works well; however, it would be more efficient to have a dedicated information system exclusively for FEAD data (while at the moment, the SIAA includes all national data regarding food aid distribution)."
GR	10	-
HR	7	"Improvements could be made in the way of extracting and summarising data."
HU	7	"The system is simple, but it fulfils its purpose."
IT	6	"The MA undertook a satisfying digitalisation campaign to collect real-time data from POs, which is still ongoing. Some POs are very small and are not digitalised, and therefore need more time to adapt."
LT	8-9	"There were no critical errors and/or discrepancies noticed. Further development of the system is planned, such as the installation of electronic signatures, which could give more opportunities and linkages to other systems." The MA emphasised that the simplification and functionality of the system could be improved. The goal is to have a system for the whole programme, where all information and data would be provided and there would be no need to use additional registers.
LV	7	"The IT system was established during 2007-13 and is being constantly improved and updated. The basis of the platform is now outdated and does not always allow for the integration new IT solutions. Nevertheless, the IT system has been operational and is liable to fully supporting the programme implementation and monitoring process. All data sets have been complete and precise. The programme will have a new IT system for 2021-27 that will

		provide access to data input by POs, which that is currently being done by the IB (SIF)."
MT	7	"There is always room to improve a tool, but overall the system is working well and we manage to report exact amounts."
PL	3	"Unfortunately, the system has very limited functionalities, which is why it was rated relatively low at level 3."
PT	9	"The SI FEAC is a very complete and highly reliable system, but beneficiary organisations complain of some complexity in filling it out. Bearing this in mind, the MA has held various training sessions for the beneficiaries, as well as being always available to support the clarification of any questions that may arise."
RO	10	"The system provides the necessary structure for each stage of monitoring, data/information collection."
SI	8	"There is no data exchange with POs."
SK	7	"It offers basic functionalities to users, but does not provide additional tools. It has been reliable over the programme period."

Source: compiled by the authors, based on the information collected by country experts and cross-checked with FEAD MAs.

The integration or monitoring IT systems with, or linkages to, national social benefits registers, and the accessibility to POs of FEAD monitoring IT systems, contribute to the quality of monitoring arrangements and the reliability of data (see box below).

- In **Greece**, a comprehensive IT system – the Integrated Information System and online platform – were developed to monitor the distribution of support, to register the data on FEAD support that has been delivered, to generate primary data and to process the reports on the achievement of FEAD monitoring indicators. The online platform provides role-based user access and allows the tracking of data on end recipients (updated monthly), as well as all inputs on products, by type and by quantity, and outputs (distribution details). The platform is seen as an innovation, and has been recognised by the evaluators of the programme as a good practice. Based on the data stored on the online platform, POs complete an annual Indicator achievement report, which is submitted via the Integrated Information System.
- In **Portugal**, the FEAD Information System (IS FEAD) allows the tracking of all FEAD-funded operations. The system is accessible to all bodies and partners in charge of FEAD implementation. The development of the system aimed to ease the eligibility check of applicants through interoperability with Social Protection Services, as well as assist POs in recording all of the activities of their operations and respective stock management, which allows all information required by EU regulations to be obtained and reported. In addition, the IS FEAD provides direct access to the indicators that are reported in the annual implementation reports. IS FEAD provides POs with an Excel file – a support tool – that can be used to help them calculate the amount of food to be delivered to each household, according to its composition. Each food delivery is accompanied by a document indicating the products provided, which is signed by the end recipient to confirm the amount of food received. This document is uploaded in IS FEAD after the delivery. IS FEAD goes beyond the minimum requirements of FEAD delegated regulation, and collects and reports indicators based on counting. Though FEAD regulations do not oblige end recipients to sign any document, the Portuguese authorities required it in order to strengthen transparency and the control system of FEAD support.
- In **Italy**, top-level data on end recipients are collected in real time by POs via the SIFEAD platform. POs that do not have access to SIFEAD collect data using their own

IT systems, which have interfaces with SIFEAD and can transmit data. When an end recipient benefits from FEAD for longer than six months, he/she is considered a frequent user. In this case, the PO opens a file and collects real data including the household composition, first name, surname and other information. The MA also collects fiscal codes to ensure end recipients are real persons. For non-frequent users (such as the homeless), it is up to each PO to find a contact approach; no file is opened about such users. The MA verifies data by contacting the POs.

- In **France**, the e-cohesion digital platform (SIAA) is used to report the data collected by POs. The SIAA is the information system that reports all national food aid data, and is used by the four existing POs. However, each PO has its own IT system, from which data can be transmitted directly into the centralised system in Excel format. Each PO submits individual AIRs, including all data coming from the SIAA platform. These are later used to prepare the AIRs at programme level to be submitted to the European Commission. Data are collected in an Excel file and transmitted to the Commission by filling the corresponding fields in SFC2014.
- In **Belgium**, 750 POs are in charge of collecting data directly from end recipients; of these, 737 report monitoring data to the MA via web forms. Some POs (e.g. 'SVP Giraud') also use electronic monitoring systems, which enable them to report real-time data. However, multiple POs report data via a cloud-based data transfer solution developed by the MA. These POs collect data with informed estimates based on administrative records, using spreadsheets or (in very few cases) paper forms. They share these data via a web form with the MA, which downloads the data in Excel format and submits it to the EC with the annual reports.
- In **Poland**, access to the system developed by the MA is granted to the IB, which collects data from the lower-level partners using its own application. The data necessary to report on the progress of the implementation of the FEAD programme in the AIRs is obtained by the MA from the beneficiary – the National Center for Agricultural Support (Krajowy Ośrodek Wsparcia Rolnictwa – KOWR). The beneficiary enters data twice a year into the IT system managed by the MA. KOWR receives the data from POs operating at national level (currently, there are four organisations). In turn, the POs at national level receive data from POs operating at regional level. Each regional organisation has under its supervision local organisations, numbering between a few and several dozens, which distribute food under the programme to end recipients. Local organisations collect the most basic information about the amount and type of assistance provided, and the number of end recipients. They aggregate the data, often in paper form, and submit it to their respective regional organisation. The limited functionalities of the IT system, and the lack of a tailored IT monitoring system that is accessible to all POs, were reported by both the MA and one of the main POs as the main weaknesses of FEAD monitoring in the 2014-2020 programming period.
- In **Lithuania**, POs have access to a dedicated FEAD system (EPLSAFIS), but have chosen not to use it for reporting. The POs submit data on end recipients to the European Social Fund Agency, which acts as a beneficiary. These data are sent via e-mail, in the form of Excel spreadsheets. Given the moderate number of POs in Lithuania (62) and the close cooperation between the POs and beneficiary in charge of data processing and quality checks, this data processing method is regarded by the MA as an acceptable and efficient way to report on the progress and results of the FEAD programme.

Our analysis shows that the granting of **access to IT systems and tools** (either directly or via an interfaced connection) to **POs and beneficiaries** reduces the administrative burden of manual entry as well as the risk of data errors, data loss and breaches of data confidentiality.

Also, the **integration of FEAD monitoring IT systems with, or linkages to, national social benefits registers and IT systems**, facilitates the process of collecting and verifying data and contributes to the quality of monitoring data. In those MSs where eligibility for FEAD support is identified on the basis of these registers (e.g. in Greece, Hungary, Latvia, Lithuania, Malta and Poland), linkages with national social support registers simplify and facilitate the collection of data on FEAD end recipients, as well making it easier for the MAs or IBs to implement data quality checks. In Estonia, it is planned that in the future, all FEAD monitoring data (including data at PO level) will be retrieved from the social benefits register, to replace the manual counting of end recipients and reduce the administrative burden on POs and beneficiaries. Since 2021, there has been an option for a plausibility check on whether or not a particular end recipient has already received food support, this check is conducted when inputting the end recipient's personal number into the IT system.

In several MSs, the IT systems developed for FEAD monitoring were based on information systems established for the implementation of other EU funds. In the case of Bulgaria, where the electronic system deployed is shared with other national Operational Programmes, this means that its use requires less financial and human resources. Such an approach was also followed in Latvia, where the system used for ERDF Operational Programmes was used as the basis for a FEAD reporting system. However, the experience of using a single IT tool in Spain for both FEAD and the ESF turned out not to work properly. During the interview with the MA, it was noted that “the technical requirements for the IT exchange system [of FEAD] were contaminated by the requirements for the ESF²⁰, which ended up complicating what was originally conceived to be simple”. The implementation of the Spanish system did not involve consultations with the POs and beneficiaries, and no capacity building was provided to them with regard to the IT tool's setup and use.

Thus, the evidence gathered shows that the usefulness of particular IT systems and other data collection tools depends on the individual national contexts in which FEAD programmes are implemented. The principle of proportionality requires that arrangements for data collection and processing should not cause excessive administrative costs for the MAs or excessive administrative burden on the POs, given the type of support provided, the limited resources available for FEAD programmes, the vulnerable target groups addressed and the involvement of multiple non-governmental POs that rely on the work of volunteers. Despite the systems and tools developed, the study team's analysis shows that **the administrative costs to the MA and administrative burden on POs due to the absence of simple and efficient solutions** for data collection, excessive national rules being in place, or the capacities of POs being limited, were seen as the main weaknesses of data collection systems for OP I. These weaknesses are less relevant in those MS that apply a bottom-up approach to FEAD OP implementation (e.g. FI, BE, FR), and which have developed close cooperation between the MA and POs.

Streamlined implementation of FEAD programme in Finland

The implementation system of the **Finnish FEAD programme** aims to reduce the administrative burden on POs, with food aid being distributed by the local volunteers of POs. During the period 2018-2020, there were 22 POs, which had a total of 480 local distribution centres. The Finnish FEAD programme only includes the distribution of food and accompanying measures.

²⁰ The requirements for the ESF are stricter and ask for more detailed supporting documents (e.g. lists of participants), including personal details of the participants. This results in higher technical and safety requirements for IT system.

In Finland, there are no eligibility criteria, and no identification or registration of beneficiaries at local level under FEAD OP I. The Finnish Food Authority is responsible for purchasing and transporting the food aid to the POs. The POs do not handle financial transactions; only food to be distributed. Thus, the input (financial) indicators are collected from the official administrative records (financial system) of the Finnish Food Authority. Common output indicators on food support distributed are counted by the local distribution centres and reported annually by the POs. In addition, common result indicators based on informed estimates by the local distribution centres, are reported annually to the POs.

It is worth noting that the implementation and monitoring arrangements of the Finnish FEAD OPs are based on mutual trust and close cooperation between the MA and the POs, with the aim of meeting the minimum legal requirements set down in FEAD regulations without causing excessive administrative burden to the POs and other organisations involved. The MA has also provided tools and methods for estimating the number and type of beneficiaries at local level. These standardised tools and methods make the estimates more coherent, as they follow the same logic and method.

2.1.3. Implementation of the structured survey

Article 17 of Regulation (EU) No 223/2014 provides that the MAs of OPs I shall carry out structured surveys of end recipients in 2017 and 2022, in accordance with the template adopted by the Commission's Implementing Regulation (EU) 2016/594. The structured survey of FEAD end recipients contains a number of questions for end recipients, the aim of which is to gain insights into their socio-economic backgrounds, current and past situation, and their views on the FEAD assistance. The **primary purpose of the structured survey is to allow the aggregation of survey results at EU level, to feed into FEAD mid-term and ex-post evaluations** conducted by the EC. In addition, the results of this survey can also be used by the MA to conduct evaluations and draw lessons learned at national level.

The analysis of data collected for this study shows that in 2017, structured surveys were conducted for all OPI type programmes, following the provisions of the Commission Implementing Regulation (EU) 2016/594 and the Guidance note on the FEAD structured survey²¹. However, despite the unified template and methodology envisaged in the Implementing Regulation and EC guidance, the actual implementation of the structured survey and data collection varied between MSs.

Our analysis shows that in 18 MSs, the MAs contracted external providers (e.g. private survey companies, or the National Statistics Office in Malta) to conduct the structured survey. However, some countries applied different approaches. For example, in Belgium, the structured survey was conducted by the POs, and no trained interviewers were involved. In France, too, the survey was mostly conducted by volunteers of the POs, in consultation with polling companies and institutes. In Hungary, the structured survey was conducted by representatives of the beneficiaries and PO, which facilitated interviews with homeless persons (see Table 4).

²¹ The European Commission, Guidance note on FEAD structured survey. Brussels, EMPL G4/SLG/JM (2016)

Table 4. Approach to the structured survey, and the data available

MS	Who conducted the survey in 2017?	Method (face-to-face, by phone, both)	Trained interviewers? (yes/no)	Children interviewed? (YES/NO)	Primary data and recordings available to the MA	Consistency of methodology in 2017 and 2022 (YES/NO/NA)
AT	External contractor	Face-to-face	Yes	Yes	Yes	Yes
BE	POs	Both	No	No	Yes	N/A
BG	External contractor	Face-to-face	Yes	No	Yes	Yes
CY	External contractor	Face-to-face	Yes	No	Yes	N/A
EE	External contractor	Face-to-face	Yes	No	Yes	Yes
FI	External contractor	Face-to-face	Yes	No	Yes	No
FR	Volunteers, in consultation with external contractors	Face-to-face	Yes	Yes	Yes	N/A
GR	External contractor	By phone	Yes	No	Yes	N/A
HR	External contractor	Face-to-face	Yes	No	Yes	Yes
HU	Beneficiaries and POs	Face-to-face	Yes	No	No	N/A
IT	External contractor/MA	Face-to-face	Yes	No	Yes	N/A
LU	External contractor	Both	Yes	Yes	No	N/A
LT	External contractor	Both	Yes	Yes	Yes	Yes
LV	External contractor	Both	Yes	No	Yes	Yes
MT	External contractor	Face-to-face	Yes	N/A	Yes	Yes
PL	External contractor	Face-to-face	Yes	No	Yes	N/A
PT	External contractor	N/A	Yes	No	Yes	N/A
RO	External contractor	Face-to-face	Yes	N/A	Yes	Yes
SI	External contractor	Face-to-face	Yes	No	Yes	N/A
SK	External contractor	Face-to-face	Yes	Yes	N/A	N/A

Source: compiled by the authors, based on the information collected by country experts and cross-checked with FEAD MAs.

The different approaches to implementing the structured survey had strengths and weaknesses. As confirmed by the discussions with FEAD stakeholders, the implementation of the structured survey by external contractors ensures a methodologically consistent approach and contributes to the accuracy and impartiality of the data and survey results. Survey answers gathered by professional and independent interviewers are less prone to be biased, as they avoid the informed selection of interviewees or personal relationships and dependence that can occur between end recipients and representatives of the partner organisation. However, external contractors face challenges when, in order to ensure the representativeness of the survey, they have to interview sensitive (e.g. migrants, people with disabilities) and hard-to-reach (e.g. homeless) target groups. To overcome these challenges, external providers use various outreach strategies, e.g. phone interviews, native language interviewers (in the case of migrants and minorities), or on-site visits to the distribution points.

While the direct involvement of POs in the implementation of the structured survey makes it easier to approach FEAD end recipients including the most sensitive and hard-to-reach groups and thus generate a better response rate, it also entails certain risks. These include:

- A non-anonymised selection of persons to be interviewed, and interpersonal relations between the staff and volunteers of POs directly involved in the distribution of FEAD assistance and the FEAD target groups, increases the risk of biased responses being provided by end recipients;
- Lack of professional knowledge and adequate training in carrying out surveys increases the risk of a methodologically inconsistent approach and the misinterpretation of questions by interviewers, which affects the quality of data collected through the structured survey;
- The implementation of the structured survey requires additional resources and increases the administrative burden on POs.

As far as coverage of different FEAD target groups is concerned, only in five MSs (Austria, France, Lithuania, Luxembourg and Slovakia²²) interviews were carried out with children receiving FEAD food and/or material support. The Guidance note on the FEAD structure survey²³ envisages that in cases where the end recipient is a child, responses should be obtained from their parent(s) or an authorised representative. However, voicing the opinions of children is also important, especially in a context in which child poverty and material deprivation is at the top of the political agenda²⁴. In 2017, those MSs that interviewed children as end recipients of FEAD support took into consideration the ages of the children and their knowledge of the FEAD support received. For instance,

- In Austria, where FEAD support aimed to address the needs of schoolchildren in low-income and materially deprived families, the target group for the interviews was beneficiary households containing schoolchildren aged from primary up to upper-secondary school age (between 6 and 18 years old). In most cases, both parents, as well as the children (often also acting as translators) were interviewed together.

²² In France and Slovakia, respondents in the age group 16-24 years constitute 6.1 % and 4.1 %, respectively, of all respondents to the 2018 structured survey, while no respondents in the age group 0-15 were interviewed.

²³ The European Commission, Guidance note on the FEAD structured survey. Brussels, EMPL G4/SLG/JM (2016).

²⁴ In June 2021, the European Commission proposal for the European Child Guarantee (ESG) was adopted by the European Union's Employment, Social Policy, Health and Consumer Affairs Council (EPSCO). The ECG aims to address the socioeconomic vulnerability of children in Europe through an integrated approach that seeks to ensure that all children in Europe are guaranteed access to free and good-quality early childhood education and care (ECEC), education and health care, **good nutrition** and decent housing.

- In Lithuania, according to the structured survey report, 118 children below the age of 15 years were interviewed (11 % of all respondents); however, this number is substantially lower than the figure initially planned (249, or 27 % of all respondents). The metadata states that the targeting of children failed, as a substantial number of parents did not give their consent for their child to be interviewed. In addition, children who responded with parental consent did not know the full information on FEAD-funded food support, and asked their parents what to answer.

More widely, our analysis revealed that the other challenges identified by interviewers were:

- questions from the structured surveys that were irrelevant to the end recipients;
- questions that required additional explanations, clarification;
- there was a need to ask additional sub-questions;
- to establish the best timing for the survey implementation.

The summary of the 2018 structured survey in **France** emphasised that the particular point in time selected by the MA to conduct a structured survey – between December 2017 and February 2018 – influenced the results of the survey. According to information provided in the summary, the types of assistance requested by end recipients in the distribution centres differ depending on the time of year. During the holiday season and winter, the help requested by end recipients relates to access to gifts or clothes. This affected satisfaction with FEAD assistance, and the overall assessment of the relevance of FEAD assistance aimed at food support. Furthermore, the very specific vocabulary of the questionnaire was difficult to understand, both for the volunteers and for end recipients. Finally, implementation of the survey caused an additional burden to the POs, since they had to organise preparatory meetings before launching the survey and travelled to the distribution points to explain to volunteers the methodology for the structured survey.

Source: Résultat de l'enquête structure sur les bénéficiaires finaux du Fonds européen d'aide au plus démunis, Paris, 28 février 2018.

Differences in the survey methods applied across the OP I type programmes, as well as the aforementioned challenges experienced by interviewers on the ground, affect the adequacy and sufficiency of data, both for aggregation at EU level, for comparative analysis (e.g. changes during the programming period) and for the *ex-post* evaluation of FEAD. As shown by the desk research, the summarised results of structured surveys submitted to the EC varied between MSs, as did the coverage of sensitive target groups in the data collected. The frequency of responses provided for all respondents (not by age or main FEAD target group) does not allow meaningful aggregation of the survey results, or for conclusions to be drawn regarding the relevance of support to a particular age range or target group at EU level, based on the summary of survey results submitted by the MSs. According to the EC guidance, the Commission does not require nor receive the microdata, but only aggregated data sets of FEAD survey at national level²⁵. Although the EC might ask to access these microdata when carrying out evaluations, the research shows that the primary data from Hungary and Luxembourg were not made available to the Commission.

The evidence collected shows that for the implementation of the second round of the structured survey in 2022, some MSs are planning to change their arrangements in comparison to the first round in 2017. At the time of writing, most MAs were still at the planning stage with the structured survey, and were not able to assess the consistency of the methodology used for the structured surveys in 2017 and 2022 in terms of interview

²⁵ The European Commission, Guidance note on FEAD structured survey. Brussels, EMPL G4/SLG/JM (2016).

method (face-to-face or phone interview), FEAD target groups to be covered by the survey, and additional questions included in the unified questionnaire template. However, the data collected by the study team shed light on the arrangements envisaged for the structured survey and additional data collection:

- In **France**, the structured survey for 2022 is being carried out by an external contractor selected via public tender, and a considerable number of questions in the template have been simplified to ease understanding among volunteers and end recipients while allowing for meaningful aggregation at national level and the comparability of data.
- In **Estonia**, it is envisaged that the structured survey for 2022 will be implemented by the same research agency that also conducted the survey in 2017. In addition to the structured survey, the Estonian MA, in close cooperation with the Estonian Statistics Office, has developed an IT system to monitor ESF project beneficiaries in the country. This allows for cross-checking of whether FEAD end recipients participate in ESF-funded measures or other programmes for people experiencing unemployment.
- In **Lithuania**, the structured survey for 2022 will stick to the same methodology applied in 2017, and will be followed by an evaluation of the relevance and added value of FEAD support conducted by the external contractor. Additional questions relating to the application of e-vouchers to deliver FEAD assistance will be included in the questionnaire for FEAD end recipients, to follow up on the *ex-ante* evaluation of FEAD-funded activities in the 2021-2027 programming period, which surveyed POs on the relevance and potential advantages and shortcomings of e-vouchers. Interviews with end recipients will be arranged by phone, and only in the case of hard-to-reach groups (e.g. the homeless) will face-to-face interviews be organised at the support distribution points. Phone interviews are seen as an effective way to reach out to various target groups (including persons with disabilities) and to gather honest responses to the questions in the structured survey.

Challenges related to COVID-19 pandemic can also cause changes in the approach to the structured survey and the strategies used to reach out to the most vulnerable target groups. Although face-to-face interviews can be partially replaced by interviews over the phone, specific target groups typically without phones (e.g. the homeless) should be interviewed in the premises of distribution points. This requires additional arrangements to ensure adherence to COVID-19 management measures and to ensure sufficient privacy for the respondents.

To summarise, though results of structured survey are available for all MSs, absence of descriptive statistics that provide the distribution of responses by different types of support and FEAD target groups monitored by result indicators, does not allow the meaningful aggregation and interpretation of structured survey results at EU level. Difficulties experienced by interviewers of the external contractors and volunteers who conducted structure survey, show that additional research methods have to be applied to gather opinion of end recipients representing sensitive and difficult to reach target groups.

Key findings on the comprehensiveness and proportionality of data collection under FEAD OP I type programmes

Analysis of the data collection arrangements put in place to monitor the implementation of FEAD OP I type programmes led to the following key findings regarding the comprehensiveness and proportionality of data collection arrangements, including data

collection methods, quality checks, the bodies responsible for data collection, and the IT systems and tools used to collect and report the data

- Member States use a mixture of data collection methods including counting, informed estimates, external registers and surveys to collect and report the data on FEAD OP I type common output and result indicators. In most cases, the **methods applied to collect data on indicators reflects the overall arrangements for FEAD implementation** and monitoring in that particular Member State.
- **Counting and external registers** are mainly used to collect data on common output indicators and FEAD end recipients (common result indicators) in cases where MSs apply a **more centralised and top-down approach** to FEAD implementation: i.e., they identify eligible recipients on the basis of national social assistance schemes and registers; use comprehensive IT tools for data collection, reporting and storage; and rely on regional and municipal authorities as POs. The values of all output and result indicators for FEAD-funded OPs in Bulgaria, Ireland, Lithuania, Malta, Poland and Romania are reported exclusively on the basis of counting. The other 17 MSs that implement OP I type programmes, apply an approach based on a mixture of data collection methods.
- **Informed estimates** are mainly used to generate the data on FEAD end recipients in MSs that rely on a **bottom-up approach to FEAD implementation** (Belgium, Finland, France and Italy) In these MSs, there are no *ex-ante* defined lists of recipients eligible for support, **personal identification of FEAD end recipients is not required**, and monitoring data are collected by staff and volunteers in the frontline organisations. Some MSs that apply a top-down approach to FEAD implementation also use informed estimates to report on end recipients and their sociodemographic characteristics (e.g. CZ, ES, LV, LU, HR, SI). **Estimates are used to generate data on sensitive target groups** such as migrants, participants with a foreign background, minorities, persons with disabilities and the homeless, when these details are not available from other sources (e.g. registers or surveys). **Simple and streamlined reporting based on informed estimates** that meet the minimum requirements for the FEAD legal framework, ensures the proportionality of data collection in MSs that rely on a bottom-up approach, as well as close cooperation between the MA and POs, and the involvement of frontline organisations.
- While counting allows to have greater accuracy in the identification of specific target groups, informed estimates can also provide **solid evidence** and allow for comparisons with other data. Thus, **comprehensive monitoring data** are collected following the principle of **proportionality** in terms of administrative burden and resources needed. However, **difficulties** regarding primary data collection, data aggregation and reporting were identified in relation to both counting (21% of indicators) and informed estimates (38% of indicators). These difficulties mainly related to the estimation of the number of FEAD end recipients belonging to sensitive target groups, the interpretation of indicators on the number of people with disabilities and homeless, as well as the format of the data reported, a lack of IT tools accessible to POs, the timeliness of data collection and reporting, and administrative burden to POs.
- The use of **external registers** is considered an easy way to generate comprehensive and reliable monitoring data or to cross-check data collected using other methods (counting or informed estimates). No difficulties were identified while using external registers to generate monitoring data. **Linkages or integration** of the FEAD monitoring systems and tools **with external (social assistance) registers**, as in Portugal, Lithuania and Bulgaria, allows details on FEAD end recipients to be obtained, as well as enabling the cross-checking of data on FEAD end recipients

reported by the POs, and ensuring the plausibility of data at a reasonable administrative cost.

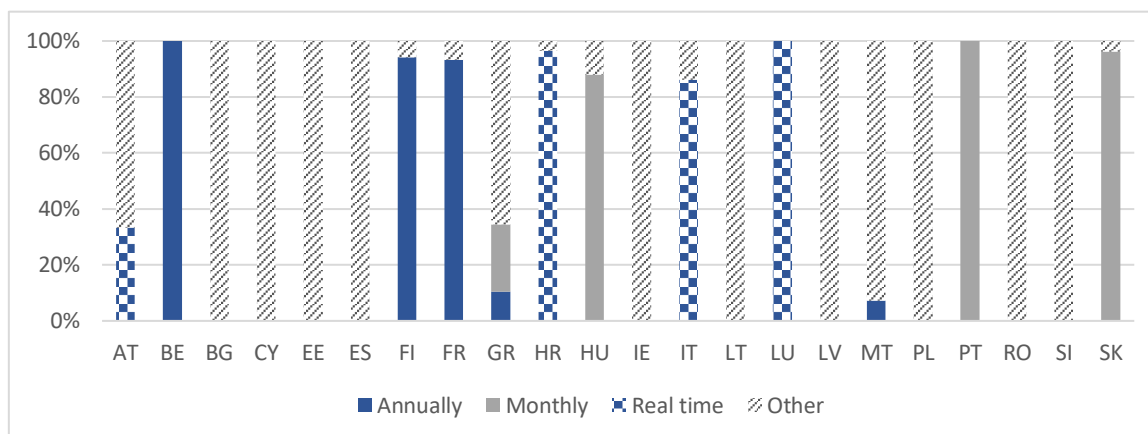
- Though only used to a limited extent as a data collection method (mainly in relation to sociodemographic characteristics), **surveys of end recipients** have caused no difficulties in the monitoring of FEAD OP I programme when used for primary data collection in Austria. As an additional tool to cross-check the data reported by POs, surveys do impose additional costs on FEAD implementation. However, in Latvia, where annual surveys are applied, they not only allow for the collection of additional data on sensitive target groups that cannot be retrieved from external registers or estimates, but also provide useful insights into FEAD implementation, the needs of target groups, and the relevance of support – as well as allowing for the validation of estimates by POs.
- The MAs' **guidance and templates for the collection, aggregation and reporting of the data** on FEAD monitoring indicators ensure the comprehensiveness and reliability of data. Across all OP I type programmes, **methodological guidelines or instructions** on how the indicator data should be collected and calculated are available for 61 % of common output and result indicators. The lack of guidance and/or user manuals for 39 % of output and result indicators is explained by the fact that the rules governing data collection have already been set out in legal acts on FEAD implementation and funding requirements (e.g. the calls for applications). To support POs and beneficiaries in data collection, the MAs also organise **training, regular meetings** and provide **ad-hoc methodological support**.
- **POs** and **beneficiaries** provide most of the data on the common output and result indicators across OP I programmes. Our analysis shows that the capacity to monitor FEAD operations varies between POs, as well as territorially affiliated organisations. The limited human and administrative capacities of some POs and frontline organisations can cause errors and reduce the accuracy of the data reported to the MA.
- The most significant errors detected by the MAs related to **the double counting of end recipients** and **over-reporting** of the total number of persons supported. The evidence gathered for the study shows that MSs which report the number of FEAD end recipients on the basis of informed estimates encounter the problem of double counting more often. Having both **systematic and ad-hoc data quality checks** in place – whether automated, based on a comparison with other data, sample-based or a mix of these – allows for the timely identification of reporting errors and contributes to the robustness of the data reported to the EC. Access to user-friendly IT solutions for FEAD monitoring, as well as training and support in using these solutions, reduces the administrative burden on POs and contributes to the quality of monitoring data;
- To complement the data on the monitoring indicators and feed into EU-level FEAD evaluations, **structured surveys** were conducted in all MSs, following the provisions of Commission Implementing Regulation (EU) 2016/594 and the Guidance note on the FEAD structured survey. However, differences in the survey methods applied between the OP I type programmes in 2017 and 2022, as well as challenges experienced by the volunteers and external contractors affect the comparability of data. The gaps and inconsistencies in the structured survey data were caused by a lack of competencies and training of interviewers, survey questions that were difficult to understand, and the point in time selected by the MA to conduct the survey. Also, the absence of descriptive statistics that provide the distribution of responses by different types of support and FEAD target groups monitored by result indicators, does not allow for the meaningful aggregation and interpretation of structured survey results at EU level.

2.2. Timeliness of data collection

The FEAD regulatory framework requires that monitoring data on indicators have to be reported annually to the EC, and the same minimum requirement can be applied to reporting at national level. However, in practice, MSs have set different rules regarding the frequency of data collection and reporting.

Analysis of information gathered for this study shows that at national level, most of the reporting on the common output and result indicators of OP I type programmes is linked to claims for reimbursement submitted to the MAs by POs and beneficiaries, rather than conducted at regular time intervals. The frequency of reporting may vary from real time, monthly, bi-monthly and quarterly to semi-annual or annual, depending on the type of assistance provided and the reporting rules set at national level. In Hungary and Slovakia, for example, reporting is carried out monthly, while in Belgium, Finland and France, annual reporting is in place (see Figure 5).

Figure 5. Frequency of reporting on common output and result indicators, OP I



Source: compiled by the authors, based on information collected by country experts and cross-checked with FEAD MAs.

Our analysis shows that the frequency of reporting set at national level is linked to the FEAD implementation approach and IT monitoring systems in place in the MS:

- In **Belgium, Finland and France**, where FEAD implementation relies on a **bottom-up approach** and no proof of personal identity is required from end recipients, **annual reporting allows the minimum requirements of FEAD regulation to be met** with no excessive administrative burden on POs;
- In **Italy**, despite its bottom-up approach, **real-time data on FEAD implementation** is available due to the well-developed IT system (SIFEAD), which is accessible to all POs; data on sensitive groups of FEAD end recipients that are non-frequent users (i.e. those who are not identified in the SIFEAD system) are uploaded after the first distribution of each month;
- In Greece, FEAD implementation arrangements follow a **top-down approach, a comprehensive IT system is in place and POs are equipped with tablets**. Most data on common output and result indicators are reported monthly via the FEAD online platform, and annually for the Indicator Achievement Report. In addition, details on the quantity of different food categories distributed are available in real time, while some other indicators (e.g. the proportion of FEAD

co-financed food products in the total volume of food distributed by the POs, and total number of meals and total number of food packages distributed) are **reported annually**;

- In Hungary, reporting on most of the indicators is carried out monthly; however, in the case of the **distribution of warm meals**, POs provide the data to the beneficiary (HKA) **weekly**, and HKA reports the aggregated data monthly in the form of datasheets;
- In Portugal, the beneficiaries report the data on FEAD implementation through a FEAD information system (SIFEAC), which allows the registration of physical and/or financial execution; the collection and processing of physical and financial execution data; and the certification of expenditure; as well as the carrying out of audits, monitoring, and evaluation. At the financial level, reimbursement requests are made by the POs with a minimum frequency of three months; however, **reporting on the physical execution** of operations can be carried out **at any time up to the request for reimbursement**;
- In Slovakia, which also applies a **top-down approach** to FEAD implementation, **reporting takes place monthly** through the information system for FEAD as well as in paper form, based on the invoices from the partner organisation.

Regular reporting on the physical implementation of the programme allows for cross-checks to be made between the financial input and the support provided to end recipients, as well as the timely identification of inconsistencies and mistakes in the monitoring data reported. In general, the MAs stated that they considered the frequency of reporting on FEAD common output and result indicators to be sufficient for their monitoring systems. Evidence gathered by the study team shows that MS which rely on a **bottom-up approach** to FEAD implementation, and which do not require the personal identification of end recipients, usually apply the minimum requirement for annual reporting. Although these MAs (in BE, FI, FR) may, in some cases, face the risk of delayed data submission by POs, they assess annual data collection and reporting as proportionate and appropriate to ensure the timeliness of data. MSs that rely on a top-down approach, as well as those who rely on a bottom-up approach but have comprehensive IT systems (e.g. IT and LU), set rules that require more frequent reporting. However, short reporting deadlines (e.g. monthly or weekly reporting), particularly if they are not linked to claims for reimbursement, and if reporting is not supported by well-developed electronic information systems, impose an additional burden on POs.

Key findings on the timeliness of data collection under FEAD OP I type programmes

The **frequency of reporting** on monitoring indicators varies from real-time monitoring in Austria, Croatia, Italy and Luxembourg or weekly reporting on prepared meals in Hungary, to annual reporting in Belgium, Finland and France that meets the requirements of FEAD legal framework. In most MSs, the frequency of reporting is linked to the submission of claims for reimbursement by POs and beneficiaries to the MAs. The frequency of reporting on FEAD common output and result indicators is regarded as sufficient by the MAs. While short reporting deadlines (e.g. weekly or monthly reporting), if not supported by well-developed electronic information systems, impose an additional burden on POs, they allow for easier and timely identification of inconsistencies and mistakes in the monitoring data and their prompt correction.

2.3. Accessibility to POs of integrated or interoperable IT systems, and data protection

The principle of monitoring data accessibility requires that all evidence gathered should be made available to the general public, unless such data includes confidential elements or is otherwise protected by the rules on data protection. However, the FEAD regulatory framework does not require the accessibility of monitoring data to the general public. Its information and visibility requirements are linked instead to the public availability of a list of operations supported by the Fund, and the accessibility of annual implementation reports. The study team focused on two main aspects of accessibility in terms of data collection arrangements at national level:

- The accessibility of integrated or interoperable IT systems and tools developed by the MA to POs;
- The protection of sensitive data.

Evidence gathered shows that the **accessibility to POs of electronic data collection systems** varies between MSs. In MSs that rely on a top-down approach, and which have well-developed IT systems for data collection, storage and reporting, POs and beneficiaries have access to and can report data directly into the electronic systems. For example, POs and beneficiaries have direct access to MAs' IT systems in Bulgaria, Greece, Lithuania, Portugal, Romania and Spain. In Italy and Belgium, both of which rely on a bottom-up approach, the MAs also made it possible for POs to access their electronic systems directly or through an interfaced connection. Other MAs mostly rely on the exchange of information and data via e-mail or, in certain cases, the submission of data on paper. Access to electronic data collection systems contributes to the reliability of data, makes data collection more effective, and better meets data confidentiality requirements (if any). However, it is important to ensure the administrative capacities of POs to use the systems in their work.

The importance of **protecting sensitive data** on FEAD end recipients is directly related to the fact that FEAD supports the most deprived and vulnerable groups in society. Reporting on FEAD end recipients and their sociodemographic characteristics raises a number of questions relating to **personal data protection, dignity** and the **non-stigmatisation of persons** supported, and the **overall safety of data**. Evidence gathered for this study shows that MAs of FEAD OP I type programmes apply different approaches to address these complex issues, depending on their overall arrangements for FEAD implementation.

MSs that rely on a **bottom-up approach** (c.f. box here-below), and which do not require personal identification in order to be eligible for FEAD support, report estimated numbers for sensitive target groups, or opt not to collect and report these data at all (i.e. France).

In **Finland**, only aggregated data is transferred to the MA. The **Finnish official registry** (where the data is stored) is protected from physical dangers such as humidity and unauthorised physical access. The reliability of data on household compositions in Finland depends on the information provided by end recipients, as there are no eligibility requirements for food assistance. Data on end recipients are **collected at the local distribution centre level** during distribution days.

In **Belgium**, end recipients are asked about the composition of their household via specific questions during private interviews. However, the common result indicator on the number of migrants, participants with a foreign background, minorities (including marginalised communities such as Roma) is considered difficult to interpret by the MA in Belgium, due to instances of overlapping citizenship.

In **France**, personal data are collected only at local level during a short interview when end recipients register with the organisation for the first time. **No sensitive data on end recipients** is provided. This fact shows a high level of data privacy measures is applied. However, in this case, no socioeconomic information on recipients of FEAD assistance can be collected and used for future improvements to the programme or to other social services at national or local level.

In **Italy**, data on frequent users of FEAD assistance (those benefiting for longer than six months) is collected by opening a separate file with information **on name, surname, household composition and other data**, based on self-reporting. In cases where people access FEAD for longer than one year, they must show **a declaration attesting to their living conditions (sensitive data)**; however, these data are not shared on a national platform. The MA obtains fiscal codes to enable personal identification of these end recipients. For non-frequent users (mostly homeless persons), data are gathered during the first distribution using informed estimates. Overall, a higher level of privacy with regard to personal data is maintained for non-frequent users in Italy; however, in the case of long-time support, the monitoring rules at the national level require personal data to be collected, mainly to enable the better adaptation of social assistance.

In MSs that rely on a **top-down approach** (c.f. box here-below), personal data are usually safely stored in external registers or data storage systems at PO level. MSs that use data from external registers can easily identify sociodemographic details regarding the age and gender of FEAD end recipients. However, other details are usually collected by POs and rely on self-reporting by end recipients or educated guesses by the staff and volunteers of POs. In most cases, the monitoring data submitted to the MAs are aggregated and anonymised, thus ensuring the protection of sensitive data from further processing.

In **Cyprus**, figures relating to **persons receiving food support, their gender and age**, are regularly submitted to the MA/intermediate body. However, the data stored in the MA's IT system does not contain personal information on end recipients (name, identity, etc.), as the **information** received is **numerical**. In Cyprus, the personal data of end recipients under the 'Baby Carer' project (such as the composition of the household), and the 'Provision of school breakfast to needy pupils' project are collected and stored at the level of local partners. All relevant privacy (personal data protection) measures are taken, and these sensitive data are not used or shared with anyone else except at local level.

In **Lithuania**, the MA applies a similar approach. **Aggregated data** (number of the persons and their socioeconomic characteristics) **are only accessible** to the MA. In this way, the personal information of FEAD end recipients is only available to social workers in the local area. The number of end recipients represents unique people (after verification of the data using the SPIS register), and reflects all the members of households. With regard to sensitive data, such as belonging to particular groups such as homeless people, migrants, Roma or people with disabilities, data are provided by end recipients themselves and/or by social workers, who also check the data to ensure its reliability.

In **Estonia**, FEAD end recipients must be eligible for social benefits in order to receive FEAD support. There is a national register that includes **personal and demographical data on the recipients of social benefits**. For monitoring purposes, a beneficiary can ask for information from the register, but normally **all information is aggregated** and secured, and no personal information should be exported from the system. The result indicators are reported using informed estimates. In the case of homelessness, the offer of food packages is based on a list of eligible homeless persons created by representatives of homeless shelters. For the future integration of the measures into the ESF+, however, the MA plans to use counting and to integrate the external registers into

the reporting system for the result indicators, allowing for data flow between the POs and the MA, minimising the administrative burden for both. Based on the previous remarks, however, the MA should consider and ensure that the privacy requirements for the end recipients are met, and whether the intended target group would be sufficiently well reflected in the external registry deployed.

In **Greece**, the integrated information system provides for a comprehensive record of **all individual characteristics of beneficiaries including age, gender and whether they are refugee camp residents. Information on whether the end recipients belong to a minority such as Roma, or are disabled or homeless, has been able to be extracted since 2020**²⁶. The MA monitors the number of end recipients through the Warehouse Inventory Monitoring web platform, which is connected with the Minimum Guaranteed Income online platform (i.e. a FEAD monitoring system integrated into a national system), and is updated with the beneficiaries' data. There is no indicator in the Regulation to consider the composition of the household. Both the POs and the MA have at all times an absolute overview of the beneficiaries including full details of them, which shows a different practice in the use of end recipients' data. In terms of data privacy, data collection is carried out with adequate privacy protection, and is updated monthly. **Data is checked electronically**, with verification and cross-checking of data using other platforms, which makes it more accurate and reliable.

In **Portugal**, the protection of sensitive data is a delicate topic, therefore only estimates on vulnerable target groups are provided to the MA. **Data on migrants, people with disabilities and people in situations of homelessness are estimated by the POs**, which in the Portuguese case are social sector organisations. SIFEAC, the national information system in Portugal, is also linked to the information system of the SSI (social security institute); however, the MA can retrieve only non-sensitive data on FEAD end recipients from this.

In **Croatia**, project beneficiaries collect end recipients' data in accordance with personal data protection legislation to protect the person's dignity. In the calls relating to school meals, the project partners (schools) keep records of pupils who receive a free meal under the project, but the MA neither collects nor stores microdata on end recipients (gender, age, disability, etc). When data on end recipients are not available, a method of informed estimation is used.

In **Malta**, data on **types of vulnerable groups are collected**. It is thus possible to know exactly what type of food has been collected by which category of vulnerable persons, and how much has been received by each individual group. However, **only the intermediate body has access** to their personal data and their identities are protected through a system of coding.²⁷

In **Latvia**, the result indicators are collected by estimation, based on the annual reports by POs and comparisons with statistical data and the socio-economic situation in the country (carried out by the MA). Neither personal data on end recipients nor the composition of their households is recorded by the programme, and no identity documents are requested or stored. The programme creates only an **overall social portrait of the end recipients**, based on **information given by the end recipients themselves**, thus fully respecting their privacy.

²⁶ FEAD Annual Implementation Report – OP I, Greece, 2020

²⁷ Once individuals are identified for FEAD assistance, their identity is protected through a system of coding. The intermediary body sends the number of eligible persons who are to the MA, The IB issues the slips used to collect food packages with these codes. The IB then sends the slips to the eligible persons. When these individuals collect the packages, their slips are collected by the PO. The PO returns the collected slips to the IB, and the identity of collectors remains within the IB.

In **Hungary**, the total numbers of persons receiving food support are recorded at the distribution sites. **Data on recipients' age and gender** are available **from national registries, except for homeless people**. The names and birth dates of homeless persons are recorded on the basis of their own narratives. To improve accuracy, sampling is also performed and the data obtained are compared with records. In the case of characteristics such as **disabilities and foreign/migrant backgrounds**, data are recorded on the basis of **estimation by staff members**. Official data on the indicator of socioeconomic background is not available except on persons with disabilities.

Key findings on the accessibility of integrated or interoperable IT systems under FEAD OP I type programmes

- **Access to integrated or interoperable IT systems** and tools developed by the MA for the monitoring of FEAD implementation in Belgium, Bulgaria, Finland, France, Greece, Italy, Lithuania, Portugal, Romania and Spain contributes to the reliability of data, enables more effective data collection, and better meets data confidentiality requirements (if any). However, it is important to ensure that POs have sufficient administrative capacity to use integrated or interoperable IT systems. In MSs with simple and streamlined data collection arrangements, the exchange of anonymised data by e-mail and the storage of data on the MAs' electronic systems meets the minimum requirements for FEAD monitoring.
- FEAD data collection arrangements at national level **allow for sufficient privacy and protection of sensitive data**. Where they are collected, these data are stored in national registers or the internal systems of POs, with access being restricted. Beneficiaries, IBs and the MAs use anonymised numeric data reported to them by POs, and usually do not have access to primary data on FEAD end recipients.

3. Data collection systems for FEAD OP II type programmes

Type II Operational Programmes (OP II) aim to facilitate the social inclusion of the most deprived people. OP II supports various activities that are provided outside of active labour market measures. Four countries – Denmark, Germany, the Netherlands, and Sweden – implement OP II programmes. OP II programmes can define their target groups on the basis of their needs and priorities. Denmark aims to deliver social inclusion services to persons suffering from homelessness, unclear residence status, abuse, mental illness and disabilities. Germany aims to improve the social inclusion of newly arrived EU citizens including parents and children, as well as homeless people. The Netherlands focuses on elderly people with low incomes, while Sweden supports the integration of vulnerable EU/EEA citizens into Swedish society. Social inclusion activities provided under OP II are often highly relevant to the needs of the target groups (e.g. vulnerable EU citizens, homeless persons or those at risk of homelessness, and older people above working age), and provide services that are otherwise lacking (e.g. health advice or social gatherings that contribute to integration).

The monitoring and evaluation of OP II programmes rely on several indicators – input indicators (common to both OP I and OP II), common output and result indicators (see Annex 1), and programme-specific output and result indicators (see Annex 2). For OP II, the common²⁸ output indicators include the total number of most deprived persons receiving social inclusion assistance. This covers end recipients from specific groups that are considered as vulnerable to social exclusion. Unlike OP I, OP II records data on the individual participants who receive assistance under OP II. The result indicators for OP II, measured through programme-specific result indicators, aim to assess whether the situation of those receiving assistance through OP II has improved.

3.1. Comprehensiveness and proportionality of data collection

3.1.1. Data collection arrangements at national level

Data collection methods and procedures vary between those Member States implementing OP II programs. Data collection procedures differ in terms of what roles various actors play in the data collection process, what methods they use to collect and analyse the data, and what systems are in place to transfer data from beneficiaries or POs to the MA. They also differ in terms of the frequency of reporting and the methods used to ensure its quality.

To better understand the data collection processes used for OP II in the aforementioned four EU MSs, it is essential to provide an overview of the implementation models for FEAD OP II type programmes.

In the context of implementing FEAD OP II type programmes, smaller countries – Denmark, the Netherlands and Sweden – set up a simple implementation structure by introducing

²⁸ 20) Total number of persons receiving social inclusion assistance; 20.a) Number of children aged 15 years or below
20.b) Number of persons aged 65 years or above; 20.c) Number of women 20.d) Number of migrants, participants with a foreign background, minorities (including marginalised communities such as the Roma); 20.e) Number of persons with disabilities; 20.f) Number of homeless persons.

fewer projects and collaborating with fewer POs to execute them. In both Sweden and Denmark, three ongoing projects are being implemented, the Netherlands implements only one. Meanwhile, in Germany, 45 projects are currently under implementation in the extended second round of funding (see Table 5).

Table 5. Implementation arrangements for FEAD OP II programmes

	Denmark	Germany	The Netherlands	Sweden
Eligibility criteria	Being a homeless, vulnerable EU migrant (Church Crusade, 2016-2019); Being a homeless street sleeper (Project ODENFOR, 2016-2019); Being homeless (Red Cross opened Care Centre in 2020); Being a homeless, vulnerable migrant in Copenhagen (The Church's Crusaders, 2019-2021); Being a homeless person with legal residence in Denmark (Salvation Army Headquarters Project STEP BY STEP).	Being a new EU immigrant (including parents and children); Being homeless or homeless threatened).	Being elderly with a low disposable income.	Being a vulnerable EU/EEA citizen with non-residence rights (homeless and earning a living through begging or as a street musician).
Number of POs	Limited number of POs and a short distance to the MA. Three project organisations: Church Crusade (in 2016 and 2019); Red Cross (in 2019); and Salvation Army Headquarters (in 2019).	Separate projects funded; large scale of POs within the projects, with cooperation between municipalities, public services and civil society, as the cooperation between municipalities and non-statutory welfare or other non-profits organisations is mandatory.	Libraries as POs (one central PO reports the data). Cooperation partners: course providers, community teams and care homes	Three POs participated in 2020; however, the number of participating organisations has varied over the years from three to 10.
Number of projects	Three ongoing projects. Five projects since 2016: two in the period 1 July 2016-30 June 2019; three projects in the period 1 July 2019-31 December 2021.	84 projects in the first round, in the period 1 January 2016-31 December 2018; 67 projects in the period of 1 January 2019-31 December 2020; currently 45 extended projects until 30 June 2022.	One project.	Three ongoing projects.
Bottom-up/top-down approach	Bottom-up approach	Bottom-up approach	Bottom-up approach	Bottom-up approach

Source: compiled by the authors, based on desk research and interviews with the MAs

In Denmark, Sweden and the Netherlands, the small number of projects and POs allow for the simple collection of monitoring data, thus avoiding an excessive administrative burden on POs. It should also be expected that more reliable records are received from a limited number of POs, which are usually in fairly close contact with the MAs. In the case of Germany, there were 84 projects in the first round, 67 in the second round, and there are currently 45 separate projects led by many different organisations under the mandatory cooperation between municipalities, public services and civil society. The data collection process is therefore organised differently, in order to ensure smooth and comprehensive data collection. Implementation of a programme that involves multiple projects and many different actors (e.g. project managers, partners, volunteers in the frontline organisations) requires a well-functioning data gathering tool and thorough coordination. This could be seen as both a challenge for the MA to ensure the reliability and robustness of the data, and an opportunity to establish a well-developed electronic system that reduces the administrative burden for all actors involved and provides quality and reliable data.

When it comes to eligibility criteria, the common feature to be mentioned among all OP II type programme countries was the choice of specific target groups to be supported by FEAD OP II-funded measures. National context and needs were taken into consideration to identify the most vulnerable group(s) at country level. However, the bottom-up approach implemented by all four MSs has made it possible for the POs **to adjust the FEAD-funded activities** to address local needs.

The main target groups of OP II type programmes include people of migrant origin, the homeless and elderly persons. In the case of Sweden, three ongoing FEAD projects target vulnerable EU/EEA citizens with non-residence rights. A large proportion of the target group are Roma from Romania and Bulgaria, who have difficulty in exercising their rights with regard to schooling for children, health care and financial assistance in their home country.²⁹ Homelessness is not an identification criterion, even though most recipients are in practice homeless in Sweden.

In the Netherlands, FEAD OP II assistance is provided to low-income elderly persons. Efforts are being made to include more participants of migrant origin and people with disabilities. Libraries were selected as POs that can offer various activities including the strengthening of digital skills, social gatherings, home delivery of books, reading together via video bubbles, and online meetings.

Homeless people are covered under the FEAD OP II programmes in Denmark and Germany, with a stronger focus on them in Denmark. Germany covers two target groups equally: (1) newly arrived EU citizens, including parents and children; and (2) homeless persons and those at risk of homelessness. In both countries, these two characteristics of being a person of migrant origin and/or homeless tend to be associated, and the assistance offered includes health care, emergency accommodation and support for the target group's physical and mental health. It aims to improve their social situation or provide advice on existing opportunities³⁰.

All in all, implementation models for FEAD OP II programmes in the four EU MSs – Denmark, Germany, the Netherlands and Sweden – can be grouped into two different clusters of data collection structures. Denmark, the Netherlands and Sweden have simple implementation arrangements which involve a limited number of POs and projects. Germany, as a large country, has multiple projects, and various POs are involved in the provision of FEAD-funded support. The following sub-chapters will provide more details and insights on the specific aspects of data collection methods, bodies in charge, the frequency of reporting and other aspects of data collection for OP II type programmes, following the

²⁹ Socialstyrelsen. 2014.

³⁰ In Germany, these two preconditions and target groups are separate: if a newly arrived EU citizen is also homeless or vice versa, he/she will be counted into the first target group.

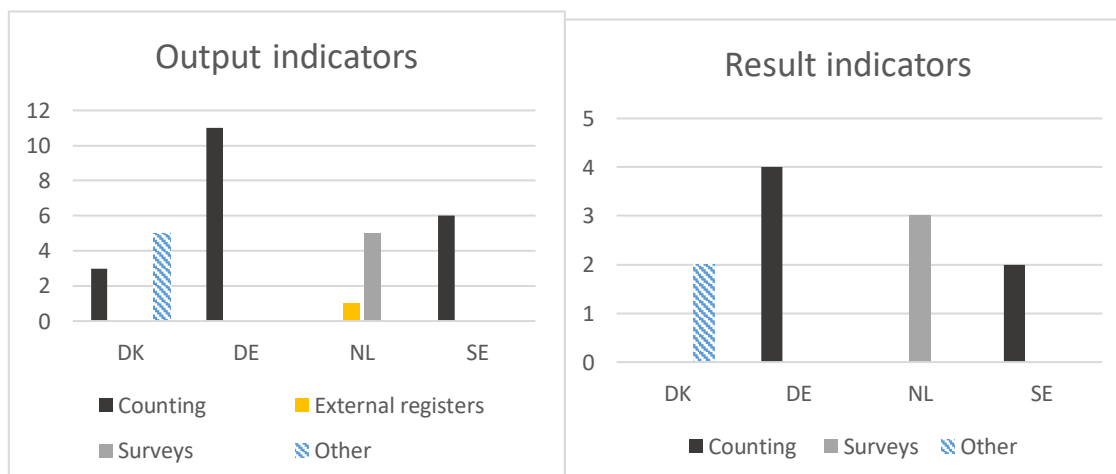
principles of the comprehensiveness and proportionality of data collection, timeliness of data collection, and accessibility of data.

3.1.2. Data collection on common and programme-specific indicators

3.1.2.1. Data collection methods

Analysis of the data collected shows that Germany and Sweden depend exclusively on **counting** to gather data on output and result indicators. The Netherlands uses **external registers and surveys**. Denmark uses **counting and other data collection methods**, such as self-reporting from projects. Data collection methods differ for output and result indicators. For example, the Netherlands combines external registers and surveys to collect data on output indicators, and uses surveys of end recipients for result indicators. Denmark combines counting, informed estimates and self-reporting by POs for output indicators, and uses informed estimates and self-reporting via surveys of end recipients to estimate results (see Figure 6).

Figure 6. Data collection methods for output and result indicators of OP II type programmes



Source: compiled by the authors, based on information collected by country experts and cross-checked with the MAs.

As the figure above shows, **counting is the main method used to collect data on common and programme-specific output indicators** (the number of most deprived people who received social inclusion assistance) in all the countries implementing FEAD OP II except the Netherlands, where **external registers** are the key method used to gather data. Data collection and reporting by multiple beneficiaries (libraries) across the country explain the need for the use of external registers to generate accurate data.

Counting is the only method used in Germany to generate FEAD OP II monitoring data; however, it requires a lot of administrative resources to collect reliable data from all of the different public and non-governmental organisations which implement FEAD OP II projects (currently a total of 45 ongoing projects). Although the administrative burden is reduced due to a well-developed IT system and standardised forms for project managers to collect data on participants, data collection remains quite complex.

Surveys and self-reporting via a survey of end recipients are used in the Netherlands and Denmark (including **informed estimates**), where they complement the data collected by using external registers and counting.

To generate the data on **FEAD programme-specific result indicators**, two countries use counting – Germany and Sweden. In Germany, due to the number of projects and accordingly, the more complex FEAD OP II implementation arrangements, the MA faces the challenge of setting up a clear, simple and standardised data collection system.

In Denmark and the Netherlands, surveys and self-reporting via surveys are used to collect data on programme-specific result indicators. These data collection methods aim to collect data on the current situations of those receiving social assistance, provide more details on their improvements over time, and provide contextual information and an assessment of the support services received. For example:

- in the Netherlands, three programme-specific result indicators have been formulated in the OP to specify objectives and measure how the quality of social life has changed for elderly people over time: after participating, the participant indicates that he or she has a strengthened social network (target value: 40 %; result: 49 %); after participation, the participant indicates that he or she has strengthened competences (target value: 60 %; result: 68 %); one year after participation, the participant is still visible to aid organizations and/or municipalities (target value: 65 %; result: 80 %). In the Netherlands, the questionnaire used for surveys is unified to ensure the comprehensiveness and uniformity of the data collected.
- Denmark uses sample-based surveys conducted by an external contractor to collect the data on result indicators. However, such surveys may not always serve as a reliable source of data, since in many cases the end recipients are hard to track down once the programme has ended (risk of participant attrition).

3.1.2.2. Data quality checks

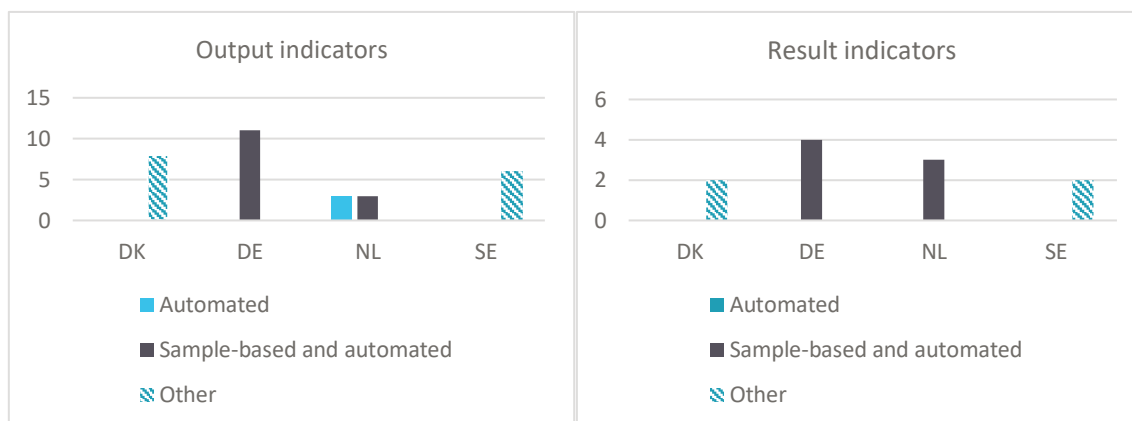
Our analysis shows that overall, the MAs in those MSs implementing OP II programmes view the existing data collection and monitoring system positively, with their ratings ranging from 7 to 10 (with 1 being weak and 10 being very good).

The information gathered and analysed by the study team revealed **several sources of potential errors in data**. The sources of errors include:

- misinterpretation of programme-specific indicators;
- miscalculation of participants when applying counting methodology to collect data;
- duplications of entries; and
- clerical errors.

To address the risks of error, various data quality checks have been adopted for OP II type programmes (see Figure 7).

Figure 7: Methods for checking quality



Source: compiled by the authors, based on information collected by country experts and cross-checked with the MAs.

In **Germany**, the MA uses **automatic plausibility checks** integrated into its IT system and applied for both output and result indicators. The large number of projects, together with the intention of avoiding excessive administrative burden, explains the choice of a sample-based and automated method for quality checks. The MA performs plausibility checks based on the numbers reported in the annual project reports. In the event that likely misreporting or implausible data are identified, the **MA does not perform any manual interventions** in the reporting system, but asks for verification and correction of the potentially misreported data by the beneficiary. All the corrections in the IT system are made by the project managers, and have to be always based on the participants' forms, which remain available for further administrative and audit verifications. The MA acts as a 'verifier', and to avoid unnecessary administrative burden, no other methods to check the data were established. However, the weakness of the system in place remains the ambiguity of the indicator definitions and potential misinterpretation of them by POs. In addition, the need for programme monitoring to comply with GDPR requirements results in additional costs to POs in terms of time, administrative and human resources.

In **Denmark**, particular difficulties arose when data were collected on people with disabilities, as the definition of who qualifies as a person with a disability has been highly ambiguous and contested. For example, disagreement exists as to whether a medical diagnosis should be used as proof of disability status. Also, challenges arise in the interpretation of the definitions of indicators on people who are addicted to drugs, alcohol or medicine. Lack of uniformity, ambiguous definitions, and the incorrect interpretation of indicators increase the risk of underestimation or double counting of persons, and lead to inaccurate data reporting. To counter this, Denmark uses sample-based quality checks for programme-specific output indicators to avoid misinterpretations as much as possible, and a wide range of other quality control methods for result indicators. These methods include sample control of appendices, visits to projects, reviews of procedures to ensure accurate audit trail, and manual follow-ups. Manual follow-ups including a thorough examination of project documentation **are used to confirm that there is no double funding**. The MA checks manually that projects receiving support from the FEAD programme do not overlap with specific projects receiving funding from the European Social Fund. Manual follow-ups are also used in accounting procedures to ensure that the expenditure claimed is valid. The MA acts as a 'controller' and is responsible for carrying out these quality control procedures. Furthermore, Denmark has an external evaluator for FEAD, VIVE, which has already carried out a mid-term evaluation of the programmes, including an assessment of these quality checks. The responsibility given to POs to collect all of the data empowers the MA to focus on data quality checks.

In **the Netherlands**, the partner organisation, beneficiaries and the MA are responsible for ensuring the quality of data. Automated plausibility checks are used for result and output indicators, and sample-based automated checks are used for output indicators. Automated methods allow easier control and data checks, as well as ensuring the reliability of data in the context of the numerous actors (libraries) that are collecting it. Beneficiaries provide instructions to their staff on how to fill in the Pladder and SurveyMonkey tools with survey data. The project leaders check the data from these two applications, and financial and administrative staff check the financial data. The MA analyses all the relevant data in Pladder and SurveyMonkey and performs multiple cross-checks of the AIR by applying the **'four-eye principle'** (two readers) when processing and analysing the data and computing indicator values. **Manual interventions are applied by the MA at the analysis stage to process the data.** For example, the MA uses Excel to filter out the data on ineligible participants or to combine other relevant data. Such manual interventions are necessary to calculate some of the indicators. All manual interventions are verified by a second person. These manual data quality control procedures only work at the analysis stage, when all of the data are gathered centrally.

In **Sweden**, the MA uses manual plausibility checks to assess data quality, but **no other manual interventions** are carried out. Instead, Sweden adopts alternative quality control methods such as annual on-site visits. Sweden only provides data to the EC on the number of participants (in compliance with the requirements of the Regulation), and collects data on their satisfaction with existing activities. The manual data control system is feasible in Sweden due to the simple structure of FEAD OP II implementation – in particular, the involvement of only three POs at the moment. During follow-up visits and on-the-spot checks, the Swedish ESF Council has agreed that the administrative routines follow the rules set out under Article 32 of the EU Regulation. However, evidence gathered during the workshop with FEAD stakeholders revealed that there are a number of obstacles to the quality of monitoring. First, the names of the participants cannot be always identified or proved using personal identity documents. In such cases, a pragmatic approach based on mutual trust is then used by POs. Second, the target group is not homogeneous and usually does not participate together in the same activity; participation in different activities increases the risk of double counting. Also, due to the mobility of the target group and low motivation, it is difficult to arrange long-lasting activities, create trust and monitor changes in the personal situation of the participants. The key success factors identified during the focus group discussion and the workshop with stakeholders, in relation to both the implementation of the OP and its monitoring, were the ability of staff to communicate in the target group's language, continuous contact, mutual trust, the adaptation of activities to the needs of the target group, and close contact between the monitoring committee and the POs.

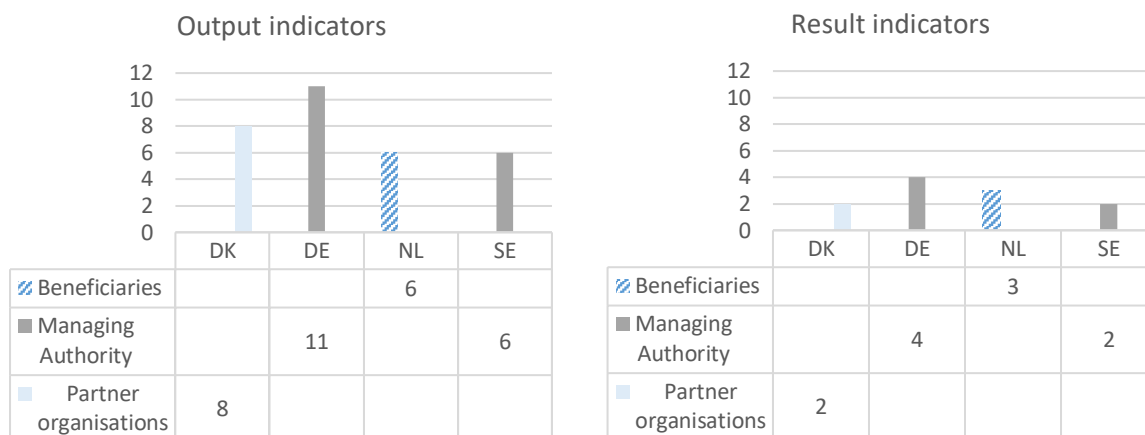
3.1.2.3. Bodies responsible for data collection

The MAs, beneficiaries and POs share responsibility for collecting data on the implementation of FEAD OP II type programmes:

- In **Germany** and **Sweden**, the MAs are responsible for collecting data on output and result indicators.
- In **Denmark**, responsibility for data collection falls on the POs; however, the possibility for an MA to become more involved in the data collection process is under discussion, due to the small number of POs and the aspiration to provide more thorough and reliable data.
- In **the Netherlands**, the PO is responsible for collecting relevant data on the output and result indicators generated by a large number of beneficiaries (libraries) involved in the provision of social assistance (see

- Figure 8).

Figure 8. Bodies responsible for collecting data on output and result indicators



Source: compiled by the authors, based on information collected by country experts and cross-checked with the MAs.

Actual responsibilities, and the degree of involvement of the POs and beneficiaries at national level, depend on the indicator in question. To ensure the proportionality of data collection systems, the MAs have established various data collection and reporting tools to be used by actors involved in FEAD monitoring.

3.1.2.4. IT systems and tools for data collection

The information gathered by the study team shows that the main factors that affect the comprehensiveness and quality of monitoring data relate to the (IT) systems and tools developed to facilitate data collection and processing. In **Germany**, the key strength of the reporting system is that data on output and result indicators are collected and reported by the POs to the MA via **a comprehensive IT system**. The IT system ZUWES has automatic plausibility checks built in, which are then complemented by data checks conducted by the MA. Such a system allows the collection of data at **the first level** of the system. This, **coupled with robust quality checks**, reduces the risk of errors. To collect data on result indicators, Germany measures the actual use of the support provided to end recipients. This is achieved through surveys, self-reporting, phone calls by POs to others partners within regional support systems, or by counting 'referral' tickets. While the strength of this method is that it allows the MA to focus specifically on the results, the limitation of this data collection model is **the lack of uniformity in the collected data**.

In **Denmark**, only the information on the number of women and persons aged 65 years or above is collected by counting, based on observations and estimates from representatives of the POs. The rest of the indicators used by the Operational Programme are entered manually by the POs in the individual end recipient files. These data are manually registered in the TAS (Tilbudsadministrativesystem) by the MA. The TAS is an administrative system used in the Danish public sector, in which each project has its own journal number. To separate administrative and financial data, another system – Navision Stat – is used to keep track of reimbursements. The administrative burden is quite high for POs in Denmark, considering the manual process used for data registration by the MA. Indeed, the need to manually enter most of the data in order to report on relevant indicators is the key weakness of the system. This is compensated by the fact that there are only a few FEAD projects, and close contact and the continuous and ongoing exchange of information and communication have been established between the projects and the MA. This would not be possible if there

were more projects or more actors involved. At the same time, such close contact and effective communication may help to address issues in close to real time any problems that may arise, which can be seen as one of the strengths of the system.

In **the Netherlands**, data collection relies on beneficiary surveys, both for output and result indicators. Data are collected in real time by individual libraries using two software programmes: Pladder and SurveyMonkey. Pladder is used at the start of participation (after the beneficiary interviews the participants), while SurveyMonkey is used during or at the end of participation (also, data from the interviews with end recipients). The central beneficiary creates an Excel file to back up the data in Pladder, and places this on the digital exchange platform on a regular basis. Such data are shared with the MA every year. Thus, the MA and the central beneficiary use a digital data exchange/transfer area where both the beneficiary and the MA can place all relevant documents. Both have rights to add, read and download the data. Participants are surveyed at the beginning and the end of the provision of service. The POs fill in the form and upload it to the data exchange platform. The questionnaire used for surveys is unified to ensure full coverage of all indicators and uniformity of the data collected. The strength of this system is that it is relatively straightforward and clear, and allows the collection of uniform data. However, manual entry of data into the system by partner organisation staff increases the risk of human error at input level. This weakness of the established data collection system is addressed by a quality check implemented by the MA (see sub-section 3.1.2.2). In addition, instructions are provided for staff entering the data into the system, which further help to reduce the risk of mistakes. An additional limitation of using surveys of end participants to measure the results is the risk that participants will not respond. In such a situation, it may be close to impossible to find and interview all those who received assistance through OP II once the programme has ended. This skews reporting on the result indicators due to both underreporting of the number of overall responses, as well as possible over-representation of positive or negative responses across the survey sample.

Sweden does not use any specific IT software for data entry and transfer. Instead, it uses administrative registers and provides standardised forms for POs to report their data. POs collect the names of beneficiaries after providing consultations on social assistance programmes, and submit these data monthly to the MA via e-mail. End recipients may provide feedback on the quality of consultations, services and assistance received by selecting unhappy or smiling faces on an evaluation form. The result indicator is calculated on the basis of the number of smiling or unhappy faces. However, this mode of collecting feedback has significant limitations. First, such feedback forms may nudge people with migration backgrounds towards more positive responses. Due to language barriers, these people often need help filling in the forms, and counsellors' assistance may influence their responses. Also, the unhappy or smiling faces may be interpreted differently by those providing feedback, and thus not reflect their actual experience. Lastly, the forms do not allow the collection of information on the reasons behind these negative or positive evaluations.

3.1.3. Implementation of evaluation surveys

For OP II type programmes, neither implementation of the structured survey nor evaluations are mandatory. Instead, it is simply good practice that MAs go beyond the minimum requirements and assess the support provided. Evidence collected by the study teams reveals that the MAs of all OP II type programmes have conducted surveys on end recipients or POs and beneficiaries as part of their programme evaluations.

In **Denmark**, the programme evaluation was based on qualitative and quantitative research methods. The project organisations carried out semi-structured interviews with participants based on instructions and templates from an externally contracted company. The company

also carried out interviews with managers, staff and participants and made observations when visiting the projects' premises. The interviews were based on the Most Significant Change approach, developed by Davies and Dart (2005). The methodology used is considered especially valid if there are no quantitative goals foreseen and when persons from different cultures are interviewed.

In **Germany**, the MA initiated a comprehensive evaluation³¹ of the effectiveness, efficiency and impact of projects funded for the social inclusion of intra-EU migrants, homeless people and those at risk of homelessness. The evaluation assessed the implementation system and the results achieved through the use of FEAD funding. In addition, it analysed the implementation of the cross-sectoral objectives and the cost-benefit ratio at municipal level. The evaluation was also geared towards providing ongoing support and advice on programme implementation. Specifically, the implementation of the first funding round was evaluated by 31 December 2018 (with recommendations for the design of a second funding round), and the second funding round by the end of 2019. The results of the evaluation were based on an ongoing evaluation of programme monitoring, 51 case studies as well as two written agency surveys and two short surveys. In addition, interviews were conducted with experts, and a literature analysis was carried out on gender-related aspects in the FEAD fields of activity.

In the **Netherlands**, the questions that end recipients were asked as part of the programme evaluations included some questions from the structured survey templates, such as how often and what type of assistance they received, what is their income type and their dwelling type. The bulk of the questions were on programme-specific topics regarding social inclusion and the social networks of the elderly in the Netherlands.

Even though **Sweden** has not conducted a structured survey, it should be noted that the programme provided a permanent survey template to recipients of FEAD support to estimate their level of satisfaction, in addition to the counting of the result indicator. Currently, Sweden is conducting a comprehensive evaluation of its OP II type FEAD programme to assess its implementation and the results achieved.

Key findings on the comprehensiveness and proportionality of data collection under FEAD OP II type programmes

Analysis of the data collection arrangements to monitor the implementation of FEAD OP II type programmes led to the following key findings on the comprehensiveness and proportionality of data collection arrangements, including data collection methods, quality checks, bodies responsible for data collection, and the IT systems and tools used to collect and report the data:

- The MAs of OP II type programmes use a **mixture of data collection methods** including counting, informed estimates, external registers and surveys to collect and report data on FEAD OP II type common and programme-specific indicators. **Germany** and **Sweden** depend exclusively on counting to gather data on output and result indicators. The **Netherlands** uses external registers and surveys. **Denmark** uses counting and other data collection methods, such as self-reporting from projects. All four MSs rely on **the bottom-up approach** to FEAD implementation to ensure that FEAD-funded social inclusion activities address the needs of the target groups – homeless persons, persons suffering from abuse, or with mental illness or disabilities (Denmark); elderly persons with low incomes

³¹ See the summary of the main findings: https://www.bmas.de/SharedDocs/Downloads/DE/Internationales/summary-of-the-main-findings.pdf?__blob=publicationFile&v=1

(the Netherlands); newly arrived EU citizens (Germany); and vulnerable EU/EEA citizens (Sweden).

- Data collection methods differ for output and result indicators in the Netherlands and Denmark. The Netherlands combines external registers and surveys to collect data on output indicators, and uses **surveys of end recipients for result indicators**. Denmark combines counting, informed estimates and self-reporting by POs for output indicators, and uses informed estimates and **self-reporting via surveys of end recipients** to estimate result indicators. Also, surveys of end recipients not only allow the values of result indicators to be calculated, but go beyond the minimum requirements to capture changes in personal situation and provide data for the evaluation of FEAD-funded support measures.
- To ensure standardised reporting that **covers all required indicators** and provides comprehensive information on FEAD-funded activities, the MSs have used various types of IT software (Germany, the Netherlands, Denmark), as well as standardised reporting forms.
- In Denmark, Sweden and the Netherlands, the **small number of projects** and POs allows for the **simple and smooth collection** of monitoring data, thus avoiding an excessive administrative burden on POs. In Germany, data collection and **reporting from the multiple projects** implemented through co-operation networks of different partners **is supported by a well-developed IT system (ZUWES)** which has built-in quality checks that are used by the MA, beneficiaries and POs. Thus, different approaches to data collection and reporting reflect the variety of FEAD implementation arrangements and ensure the proportionality of data collection.
- The actual responsibilities of actors involved in FEAD implementation at national level depend mainly on **the indicator** being considered; however, in most cases **the POs and beneficiaries** collect primary data on the common output and programme-specific result indicators across OP II programmes. In **Germany** and **Sweden**, the MAs are responsible for collecting data on output and result indicators; however, the primary data are generated by beneficiaries and POs that deliver the FEAD support for social inclusion activities for selected target groups. In **Denmark**, responsibility for data collection falls to the POs; however, the possibility for the MA to become more involved in the data collection process is under discussion, due to the small number of POs and the aspiration to provide more thorough and reliable data. In the **Netherlands**, the partner organisation is responsible for collecting relevant data on the output and result indicators, taking into account the large number of libraries involved in the provision of social assistance.
- **Clear responsibilities** for the different actors involved in data collection and reporting, **limited manual follow-ups** on monitoring data, and the **ability to log all changes** made to the data reported by partners and beneficiaries, contribute to comprehensive data collection at proportionate costs. However, the MAs reported several weaknesses of FEAD monitoring which hinder the comprehensiveness of data collection. First, in the case of Germany, there is a **lack of uniformity in the data collected** on result indicators when multiple methods (self-reporting, phone calls, etc.) are applied to assess the number of end recipients who used the services to which people were referred by FEAD-funded projects. Second weakness lies in the **ambiguity of indicator definitions**, and the **misinterpretation** of them by POs (Germany, Denmark), e.g. when reporting on sensitive target groups. Third, in the Netherlands and Denmark there is a **risk that participants do not respond, or provide biased answers**, when data are collected via surveys of participants, especially if

participants are interviewed one year after participating in project activities (the Netherlands).

- For OP II type programmes in Denmark and the Netherlands, **surveys of end recipients** have been performed **as part of programme evaluations**. In Germany, surveys of beneficiaries and POs were conducted. In Sweden, where a final evaluation of the FEAD programme is currently being conducted, a permanent survey template is distributed to all end recipients in order to estimate their level of satisfaction, in addition to the data on the result indicator collected by counting.

3.2. Timeliness of data collection

To obtain consistent and reliable data, it is important to ensure regular reporting based on established standardised data collection and recording procedures, and to provide guidelines and training to POs, if required. The MAs of each OP II type programme identified the frequency of reporting as being sufficient, even though it varies significantly by country, based on the intricacies of data collection systems. To ensure standardised reporting that covers all required indicators and provides the necessary data, the MSs have used various types of IT software (Germany, the Netherlands, Denmark), as well as standardised reporting forms. The MAs and IBs of OP II type programmes have also provided guidelines and guidance on key indicators and data collection methods.

In **Denmark**, POs report data to the MA **every six months**. On 30 June and 31 December, the POs send data on the number of participants as well as sociodemographic information on their age, gender, migration status, disabilities and alcohol/drug dependence. This data is manually registered in the **TAS (Tilbudsadministrativesystem) by the MA**. The administrative burden is quite high for POs in Denmark, given the manual process used for data registration by the MA. According to the MA, the manual procedure for entering data into TAS system has been chosen because there are so few projects in the Danish context that an automated system would not be feasible (only three POs, and a short distance between the MA and the project organisations).

In **Germany**, project managers and counsellors report data in **real time** by entering it into the **IT system ZUWES**. The system is also used to transmit the data to the MA. Participation forms and questionnaires can be downloaded from the ZUWES platform to substantiate reported data. This method of using an IT system to gather data from 84/67/45 different project managers across the country contributes to the reduced administrative burden. However, as mentioned in the previous sub-chapter, to ensure its reliability, data collection should be as simple as possible.

In the **Netherlands**, data (mostly supported by documentary evidence) are **reported by the beneficiary to the MA at least once a year**, as there is only one project on social inclusion assistance. The **MA collects, audits and calculates relevant data**.

In Sweden, aggregated monitoring data are reported **monthly** via **written reports, submitted to the MA via e-mail**. Such frequency of data reporting could allow errors to be identified more easily, allowing corrective actions to be taken in advance. The FEAD website in Sweden provides standardised reporting forms that are available for the reporting organisations to download and report on the key indicators. The MA in Sweden is responsible for the final version of the data reported in annual implementation reports to the EC.

Key findings on the timeliness of data collection under FEAD OP II type programmes

- The MAs of all four OP II type programmes identified the frequency of reporting as being sufficient to monitor implementation of FEAD OP II type programmes. The analysis shows that current arrangements meet FEAD regulatory requirements and allows for reporting the data to the EC in a timely manner. Moreover, the frequency of data collection considers the types of social inclusion activities and programme-specific indicators used to monitor them.
- In Germany, real-time data are reported into the ZUWES system by project managers using standardised templates. In Denmark, data are reported to the MA semi-annually, while in the Netherlands the data are reported annually to meet the minimum requirements of the FEAD regulatory framework. In Sweden, monitoring data are reported monthly via written reports, which are submitted to the MA via e-mail.
- Frequent data reporting allows for errors to be identified more easily, enabling corrections to be made in advance. However, it also increases the administrative burden on POs.

3.3. Accessibility to POs of integrated or interoperable IT systems, and data protection

As with FEAD OP I type programmes, the study team focused on two main aspects of accessibility in terms of data collection arrangements at national level:

- accessibility to POs of data exchange and storage systems;
- protection of sensitive data.

Three out of four MSs implementing FEAD OP II type programmes – Germany, Denmark and the Netherlands – use IT systems and tools to collect and report data to the MA. In these countries, POs have access to IT systems developed by the MAs. However, given the small number of projects and actors involved in the delivery of FEAD support in Denmark and Sweden, a substantial part of data collection and reporting is based on the exchange of information by e-mail.

As far as collection and protection of sensitive data are concerned, MSs implementing OP II programmes adopt **different approaches to collecting data on FEAD end recipients**, as well as different methods to protect these data. In terms of the types of data collected,

- Germany, the Netherlands and Sweden do not collect **personal data**, while Denmark checks personal IDs to establish whether a person is legally resident in Denmark.
- All countries collect **information on the origin, age, gender, housing situation, disability(-ies) or membership of a minority group, as FEAD social assistance targets particular groups of people**. In the Netherlands, if no

information on their age is available, individuals are not eligible for the programme.

- Given the sensitivity of certain topics, most difficulties arise when collecting data on disability and substance abuse, as these are mostly reported on the basis of self-declaration by FEAD end recipients.
- Not all countries collect data on **household composition**, which may impact the needs for specific social integration services such as kindergarten enrolment.
- Germany and Denmark collect data on additional indicators. For instance, Germany collects additional data on the country of origin, while Denmark collects data on the use of other provisions for the homeless, the purpose of which is to ensure that the most appropriate services are delivered. This is not required, but is important for the inclusiveness of the assistance.

All MSs implementing OP II programmes have undertaken measures to ensure adequate protection of the data collected. In **Germany**, MA provides information in accordance with GDPR on the requirements for data storage and documentation, but each organisation must make the necessary arrangements for data protection. The data transfer to the MA is encrypted, access to the data is based on predefined rights for relevant actors, and data is logged and regularly backed up. While MA claims that the systems are protected from physical dangers, cyber-attacks and unauthorised access, little information is available about how this is achieved.

In the **Netherlands**, the project leader of a beneficiary organisation regularly makes a backup Excel file of the data from Pladder, and uploads it to the digital exchange platform. Such data is shared with the MA every year. The Excel files log all of the changes made to them, and who makes those changes. The digital exchange platform is protected by a two-step identification technology. Only the project leader, as well as the financial and administrative staff representing the beneficiaries, have access to the platform, and only three people from the MA have access to the digital exchange platform.

In **Denmark**, POs are responsible for protecting participants' data in accordance with the GDPR. The MA provides information on the requirements for data storage and data documentation, but the individual project organisations must make the necessary arrangements for data protection themselves. Only FEAD staff can access and revise the data, and all modifications and new entries must be logged into a journal. The main problem with reporting concerns the target group and the indicators related to the problematics of disability and abuse. The project managers are cautious about 'stigmatising' people using the indicators, and in the Danish context, the most important indicators are about the number of participants in the projects and whether the project can meet the needs of the target group and thereby enable them to move into another project.

In **Sweden**, no information collected is linked to specific individuals, and only aggregated data are reported. Only one standardised reporting form uses the names of participants, but no further personal identification information is collected. The MA follows GDPR compliance routines for FEAD projects, with no further specifications provided.

Key findings on the accessibility to POs of data collection under FEAD OP II type programmes, and data protection

- Accessibility of data exchange and storage systems is ensured to POs as the main primary data providers in Germany, Denmark and the Netherlands. However, given the small number of projects and actors involved in the delivery

of FEAD support in Denmark and Sweden, a substantial part of data collection and reporting is based on the exchange of information by e-mail.

- All MSs implementing OP II programmes have undertaken measures to ensure the adequate protection of sensitive data, using encrypted data transfer and access based on predefined rights (Germany, the Netherlands), regular data backups and logs of the changes made (the Netherlands, Denmark), and anonymisation of data reported to the MA (Sweden, Germany). However, the need to comply with GDPR requirements raises additional administrative, human resource, and time costs for programme monitoring at the level of POs.

4. Transferability of good practice of data collection

With regard to the **identification of good practices**, the study team followed a two-step approach and compiled a database of potential good practice examples. The database categorised **good practices, taking into consideration key elements of the data collection systems** such as data collection methods, tools and (IT) systems for data collection; data quality control procedures; the protection of sensitive data. In a second step, the study team qualitatively assessed the collected good practices and identified transferability conditions. The compilation of potential good practice examples was discussed during the **workshop with stakeholders involved in FEAD monitoring at national level**.

The identification and qualitative assessment of good practices were built on the self-assessments of the MAs collected through interviews, as well as information collected in the focus groups and during the workshop with stakeholders. The following criteria were considered for the identification of examples of good practice:

- high reliability and robustness of data on monitoring indicators;
- maintenance of a light and flexible administrative system for the FEAD programme;
- reductions in administrative burden and the costs of data collection;
- no excessive requirements and 'gold plating'³² being imposed;
- due consideration being given to the dignity and non-stigmatisation of FEAD end recipients.

The list of good practice examples identified are presented, together with detailed descriptions, in Table 6 below.

³² 'Gold plating' refers to the setting of excessive by national, regional and local authorities with respect to the implementation of EU law.

Table 6. Good practice examples from FEAD OP I and OP II and their transferability

Good practice example	Conditions for transferability
FEAD OP I type programmes	
<p>1. Comprehensive monitoring and data collection system that ensures a high level of transparency and an audit trail throughout all of the process of FEAD OP implementation and monitoring (BG, GR, PT).</p>	<ul style="list-style-type: none"> - Integrated IT system with interlinks to national registers and access granted to POs involved in data collection and reporting; - Sufficient data protection measures should be in place to ensure that personal and sensitive data is stored or viewed safely and used only for reporting of anonymised values. - Sufficient amount and continuity of support distributed (FEAD- and non-FEAD-funded) to justify the resources required for the development of the monitoring and data collection system; - Training, guidance and technical support for POs and local partners involved in the distribution of support.
<p>2. User-friendly electronic platforms and other e-cohesion solutions that allow real-time monitoring and reporting for all parties involved and ensure consistent and high-quality data (GR, IT, PT, RO)</p>	<ul style="list-style-type: none"> - Sufficient amount and continuity of support distributed (FEAD- and non-FEAD-funded) to justify resources required for the development of the electronic system and tools; - Accessible to MA, IB, beneficiaries and all POs at any level of distribution of support; - Interoperability with the tools and systems used by the main POs and national registers; - Training, guidance and technical support to POs and local partners.
<p>3. Generation and reporting of monitoring data exclusively on the basis on counting (BG, LT, MT), without any estimates.</p>	<ul style="list-style-type: none"> - Application of clear and documented conditions for eligibility for FEAD support; - <i>Ex-ante</i> generated lists of eligible end recipients (based on national social benefits registers or other national support schemes); - Availability of information on main sociodemographic characteristics of all FEAD end recipients derived from national registers; - Centralised monitoring systems that allow the collection and aggregation of data on FEAD output indicators.
<p>4. Methodology and guidance for the POs to ease the data collection and reporting process.</p>	<ul style="list-style-type: none"> - Training and technical support for the POs and other partners on the application of methodological manuals and guidance.
<p>5. A consistent and unified methodology for calculating the value of the indicator on FEAD-funded meals on the basis of informed estimates (GR³³).</p>	<ul style="list-style-type: none"> - Reliable information (IT) systems that allow a precise calculation and aggregation of the amounts of different types of FEAD-funded food products delivered to POs/beneficiaries (soup kitchens in the case of GR); - The amounts of different types of FEAD-funded products required to produce a plate of a hot meal should be defined at national level; - Clear calculation procedures and the division of responsibilities are in place to calculate the value of the indicator;

³³ In Greece, out of approximately 80 different kinds of food products that are distributed, the MA has selected certain basic products (e.g. meat, poultry, pasta, potatoes etc.) used to produce a plate of a hot meal. All other products are considered supplementary, and are not taken into account. Based on the National Nutrition Guides, the MA sets out how many grams of each type of product required to produce a plate of hot food. Once the report of the amount of food that is delivered to soup kitchens is obtained from the system, the MA converts the total amount delivered of these selected products into meals.

	<ul style="list-style-type: none"> - Training and methodological support are available for the staff of the MA who are in charge of calculating the values of the indicators.
<p>6. Delegation of data collection, aggregation and reporting functions to the POs and local partners that are directly involved in the distribution of support. Application of informed estimates as the main way to generate monitoring data, ensuring the proportionality of data collection.</p>	<ul style="list-style-type: none"> - Consistent and unified methodology for estimating values of FEAD monitoring indicators; - Strengthening capacities of POs and other partners and continuous provision of technical support for data collection, aggregation and reporting; - Regular and exhaustive data quality checks implemented by IP or MA to verify the robustness and accuracy of data.
<p>7. Use of data from national registers to retrieve sociodemographic data on FEAD end recipients in order to reduce the administrative burden on POs and contribute to the proportionality of data collection.</p>	<ul style="list-style-type: none"> - Eligibility for FEAD-funded schemes is based on national social support mechanisms and criteria; - Integrated FEAD monitoring IT system with interlinks to national registers is in place; - Role-based user access to national registers is granted to actors involved in FEAD monitoring, according to the particular responsibilities assigned to each of them; - Sufficient data protection measures are in place to ensure that personal and sensitive data is stored or viewed safely, and is used only for the reporting of anonymised values.
<p>8. Implementation of the structured survey by an external contractor, applying a mixture of data collection methods (face-to-face and phone interviews) and strategies to reach sensitive target groups. Use of structured survey to collect additional information corresponding to evaluation needs identified by the MA. Application of descriptive statistics to provide the distribution of responses by different types of support and FEAD target groups monitored by result indicators, allowing the meaningful aggregation and interpretation of structured survey results at EU level.</p>	<ul style="list-style-type: none"> - Availability of services of social research and expert survey organisations (private companies and/or public statistical or research offices) in the market; - Availability of sociodemographic characteristics (age, gender, foreign background, migrant background, minority group, disability, homelessness) and contact details (phone number, administrative territory) of FEAD end recipients to randomly select a representative sample of respondents; - Consent of end recipients to share their contact details (phone number, administrative territory) with an external contractor; - A detailed analysis of the survey template, and sufficient training of interviewers to ensure a methodologically coherent interview approach; - The assistance of POs in providing an appropriate physical environment to interview FEAD end recipients in the premises of distribution points in cases where particular target groups can be reached only at the support distribution point (e.g. homeless persons).
FEAD OP II type programmes	
<p>1. Straightforward OP II data collection system (NL)</p>	<ul style="list-style-type: none"> - A limited number of projects with a focus on a particular target group; - Standardised questionnaires to gather unified and comparable data; - Use of simple IT tools to collect and report survey data.
<p>2. Monthly data reporting allowing for the timely identification of mistakes and reporting errors (SE)</p>	<ul style="list-style-type: none"> - Simple and standardised templates for reporting only essential data or reporting only on selected indicators; - Close cooperation between the MAs and a limited number of POs and beneficiaries;
<p>3. Standardised templates for interviews and surveys (DK, NL)</p>	<ul style="list-style-type: none"> - Standardised templates are likely to generate fewer errors and more reliable data; however, they should be clear and simple in order not to impose an additional administrative burden on POs; - Close collaboration between the MA and PO(s) is required while developing the templates for data collection and reporting;

STUDY SUPPORTING THE MONITORING OF FEAD – DATA COLLECTION SYSTEMS IMPLEMENTED
BY MEMBER STATES

	<ul style="list-style-type: none"> - The personnel in charge of data collection are sufficiently well trained in using the templates in a coherent way;
<p>4. Comprehensive IT system for data collection and reporting and real-time data transfer into the system by project managers using standardised templates allowing for the timely identification of mistakes and reporting errors (DE)</p>	<ul style="list-style-type: none"> - Medium-to-large number of projects and/or beneficiaries involved; - Interoperability of IT system with systems and tools used by POs (if any) or direct access to the centralised IT system granted to POs; - Standardised templates are available to the multiple POs and frontline organisations to gather unified and comparable monitoring data and report on it through the IT system; - Sufficient guidance and training are provided to POs as to how to collect and report the data in a unified manner using the IT system.
<p>5. Conducting of evaluation surveys on end recipients or beneficiaries/POs as part of programme evaluations (all four MSs)</p>	<ul style="list-style-type: none"> - Scope and assessment criteria for the evaluation are set in advance; - Main evaluation survey questions are included in the templates of the questionnaires used to collect data on monitoring indicators; - Conducting of the evaluation survey is supported with external expertise to ensure independent judgment and unbiased results; - Contact details of end recipients (who provided their consent) are available, or other possibilities are ensured for external experts to reach out to end recipients; this contributes to the representativeness of the evaluation survey; - Results of the evaluation surveys are used to improve and adjust interventions during the programming period or to assess the final results and added value of FEAD during the <i>ex-post</i> evaluation, and to prepare for the next programming period.

Source: compiled by the authors.

Conclusions and recommendations

The analysis conducted shows that the monitoring of FEAD-funded OP I and OP II type programmes in different MSs follows the FEAD legislation and guidance on data collection and reporting. However, differences in data collection arrangements, the rules for data collection, aggregation and reporting, and quality checks do affect the comprehensiveness, proportionality, timeliness and accessibility of data. Based on the results of the analysis of data collection, aggregation and reporting arrangements for the monitoring of FEAD OP I and II type programmes, below we present the key findings of the study and provide recommendations for the 2021-2027 programming period.

Collection of data on OP I type programmes

Comprehensiveness and proportionality of data collection systems

The flexibility of the FEAD legal framework in the 2014-2020 programming period resulted in a variety of data collection systems being developed by those MSs implementing OP I type programmes. All methods envisaged in the FEAD legal acts and guidelines were used by the MSs to gather data on the FEAD monitoring indicators. **Counting** was the most common method of data collection across the OP I programmes, but in most cases MSs applied approaches based on **a mixture of data collection methods**. The choice of data collection methods applied in the monitoring of FEAD programmes reflects the national context of FEAD support provision, including general arrangements for programme implementation – e.g. top-down or bottom-up approach to programme implementation, the requirement to prove personal identity to be eligible for FEAD support, the number of partners involved in the implementation and monitoring of FEAD as well as the IT systems and tools developed or adapted to collect, aggregate and report the data on the implementation of FEAD programmes:

- **Counting and external registers** are mainly used to collect data on **common output indicators** and FEAD end recipients (common result indicators) where MSs apply a **more centralised and top-down approach** to FEAD implementation: i.e. the eligible end recipients are identified on the basis of national social assistance schemes and registers; comprehensive IT tools are used for data collection, reporting and storage; programmes rely on regional and municipal authorities as POs. The values of all output and result indicators of FEAD-funded OPs in Bulgaria, Ireland, Lithuania, Malta, Poland and Romania are reported exclusively on the basis of counting. Other MSs apply an approach based on a mixture of data collection methods.
- **Informed estimates** are mostly used to generate **data on FEAD end recipients** in MSs that apply a **bottom-up approach** to FEAD implementation. In Belgium, Finland, France and Italy, there are no *ex-ante* defined lists of end recipients eligible for support, and personal identification is not required for end recipients to be eligible for FEAD support. Also, **estimates are used to generate the data on sensitive target groups** such as migrants, participants with a foreign background, minorities, persons with disabilities and the homeless, when these details are not available from other sources (e.g. registers or surveys).
- The use of **external registers** is considered an easy way to generate comprehensive and reliable monitoring data or to cross-check the data collected using other methods (counting or informed estimates). No difficulties were identified with the use of external registers to generate monitoring data. **Linkages or the**

integration of FEAD monitoring systems and tools **with external (social assistance) registers**, as in Bulgaria, Lithuania and Portugal, allows details on FEAD end recipients to be obtained, as well as the cross-checking of data on FEAD end recipients reported by the POs, and ensuring the plausibility of data within reasonable administrative costs.

- The use of **surveys** to collect primary monitoring data on FEAD implementation causes no difficulties in Austria and France, both of which apply a bottom-up approach to FEAD implementation. Used as an additional tool to cross-check data reported by POs, surveys impose additional costs on FEAD implementation; however, they also allow the collection of additional data on sensitive target groups that cannot be retrieved from the external registers or be easily estimated. In Latvia, where surveys are used in this manner, the data collected also provide useful insights into FEAD implementation, the needs of target groups, and the relevance of support.

Our analysis shows that **simple and streamlined reporting based on informed estimates** meets the minimum requirements of the FEAD legal framework. It is a **proportionate** and reliable method in MSs that rely on a bottom-up approach, where there is close cooperation between the MA and POs, and the involvement of a frontline organisation. This cooperation is crucial to ensure a widespread and common understanding of the definitions to be used for indicators when producing informed estimates. While **counting** allows specific target groups to be identified more accurately, **informed estimates** provide solid evidence and allow comparisons with other data while reducing administrative burden.

In relation to both counting and informed estimates, **difficulties** were identified with regard to **primary data collection** as well as **data aggregation and reporting**. Due to ambiguous definitions and the sensitivity of the information concerned, **estimates** are particularly difficult for POs when reporting on FEAD end recipients identified as belonging to sensitive target groups such as migrants, participants with a foreign background, minorities, persons with disabilities and the homeless. On the other hand, reporting based on **counting** imposes an excessive administrative burden on POs, especially when this data collection method is not supported by an interoperable IT system, or reporting rules go beyond the minimum requirements of the FEAD legal framework.

Access to user-friendly IT solutions for FEAD monitoring, as well as training and support in the use of these solutions, **reduces the administrative burden on POs** and contributes to the quality of monitoring data. In line with the FEAD legal framework, all MAs have developed **electronic data storage systems**; however, the accessibility to POs of these systems varies between MSs. **Access to centralised IT solutions** developed by the MAs **is available to POs** in Belgium, Bulgaria, Finland, France, Greece, Italy, Lithuania, Portugal, Romania and Spain. Also, to simplify and facilitate both the collection of data on FEAD end recipients and the data quality checks implemented by the MAs, **linkages between FEAD IT systems and national social support registers** were established in those MSs where eligibility for FEAD support is identified on the basis of information from these registers (e.g. Greece, Hungary, Latvia, Lithuania, Malta, Poland). In other MSs, the electronic systems have limited functionality or were developed without the aim of being accessible to POs.

To ensure the comprehensiveness and reliability of monitoring data, most MAs prepared **guidance and templates for the collection and reporting of data** on FEAD monitoring indicators. Across all OP I type programmes, **methodological guidelines or instructions** on how the indicator data should be collected and calculated are available for 61 % of common output and result indicators. To support POs and beneficiaries in data collection,

the MAs also organise **training, regular meetings** and provide ***ad hoc* methodological support**.

Our analysis shows that the capacity to monitor FEAD operations varies between POs. The limited human and administrative capacities of some POs and frontline organisations can cause errors and reduce the accuracy of the data reported to the MA. The most significant **errors** detected by the MAs were in relation to the **double counting of end recipients** and **over-reporting of the total number of persons supported**. The evidence gathered for the study shows that MSs which report the number of FEAD end recipients on the basis of informed estimates face the problem of double counting more often. **Systematic and *ad hoc* checks on data quality** (automated, based on comparison with other data, sample-based, mixed approach) allow the timely identification of reporting errors and contributes to the robustness of data reported to the EC. To **verify the plausibility of the values** reported, the MAs or intermediate bodies conduct **comparisons against data from external registers** (Belgium, Lithuania, Latvia); **historical data** (Belgium); or **sample-based documentary checks** (Bulgaria, Cyprus, Estonia, Portugal, Slovenia). Other methods to ensure the quality and reliability of the data reported include the ‘four eyes’ principle – in which two independent checks are made on the same dataset – as well as discussions, clarifications and close collaboration with the POs in MSs that apply a bottom-up approach (e.g. Finland, Italy, France).

To complement the data on monitoring indicators and to feed into EU-level FEAD evaluations, the first round of **structured survey** was conducted in all MSs in 2017, in accordance with the provisions of Commission Implementing Regulation (EU) 2016/594 and the guidance note on the FEAD structured survey. The research conducted reveals variations between Member States in terms of the completeness and comprehensiveness of the structured survey reports submitted to the EC. Moreover, the absence of descriptive statistics of structured survey data that provide the distribution of responses by different types of support and FEAD target groups monitored by result indicators, not allowing the meaningful aggregation and interpretation of structured survey results at EU level.

Differences in the survey methods applied in 2018 and 2022, as well as the risk of survey questions being misinterpreted, a lack of professional knowledge and adequate training on the part of the volunteers involved in the implementation of the survey and the point in time selected by the MA to conduct the survey affect the comparability and consistency of data. The main strengths and weaknesses identified in the various approaches to survey implementation are as follows:

- Implementation of a structured survey by the POs, in particular by volunteers, offers an easy approach to reaching FEAD end recipients – especially the most sensitive and hard-to-reach groups – and generates a better response rate. However, it also poses risks in relation to biased answers and skewed data, and a lack of uniformity in the application of the survey methodology.
- Implementation of a structured survey by external contractors ensures a methodologically consistent approach, and contributes to the accuracy and impartiality of the data and survey results. However, external contractors face challenges when sensitive target groups (e.g. migrants, people with disabilities) and those who are hard to reach (e.g. the homeless) must be interviewed to ensure the representativeness of the survey. External contractors are not in direct contact with the end recipients, and do not have an established relationship of trust that can ease their outreach to these groups.

Timeliness of data collection

The **frequency of reporting** on monitoring indicators varies from high – real-time, weekly or monthly – to annual reporting, which meets the minimum requirements of FEAD legal framework. In most MSs, the frequency of reporting is linked to the submission by POs and beneficiaries of claims to the MAs for reimbursement. The frequency of reporting on FEAD common output and result indicators is seen by the MAs as sufficient.

The research shows that MSs which rely on a **bottom-up approach** to FEAD implementation and do not require the personal identification of end recipients (in particular, Belgium, Finland and France), usually apply the minimum requirement of annual reporting. While these MAs may, in some cases, face the risk of delayed data submission by POs, they assess annual data collection and reporting as proportionate and appropriate to ensure the timeliness of data. MSs that rely on a top-down approach, or which use a bottom-up approach but have comprehensive IT systems (e.g. Italy and Luxembourg), set rules requiring more frequent reporting. Shorter reporting deadlines (e.g. weekly or monthly) allow for the timely identification of mistakes and reporting errors. However, if reporting is not supported by well-developed IT systems, frequent reporting imposes an additional burden on POs.

Accessibility to POs to integrated or interoperable IT systems

The FEAD regulatory framework does not foresee the accessibility to the general public of monitoring data. Consequently, assessment of the accessibility of data collection focused on arrangements to ensure the accessibility of data exchange and storage systems to POs, and the protection of sensitive data.

In Belgium, Bulgaria, Finland, France, Greece, Italy, Lithuania, Portugal Romania and Spain, **accessibility to POs of integrated or interoperable IT systems** and tools developed by the MA for the monitoring of FEAD implementation contributes to the reliability of data, more effective data collection, and the better fulfilment of data confidentiality requirements. In MSs with simple and streamlined data collection arrangements, the exchange of anonymised data via e-mail and the storage of data using the MAs electronic system meets the minimum requirements for FEAD monitoring.

All MSs that implement OP I type programmes have undertaken measures to ensure adequate **protection of sensitive data**. An overview of FEAD data collection arrangements shows that where data are collected for the purpose of monitoring and reporting, they are usually stored by or only accessible to those at the very lowest level of FEAD implementation. In most cases, beneficiaries, intermediate bodies and MAs do not have access to primary data on FEAD end recipients – the data reported to them by the POs are anonymised and numeric. In most MSs, **personal data** on FEAD end recipients is gathered **from the national social assistance registers**, while **in Belgium, Italy, Finland and France**, which do not require individual identification of FEAD end recipients, **sociodemographic characteristics are estimated** by the staff and volunteers of frontline organisations. In France, data on sensitive target groups are neither collected nor estimated, as this is legally forbidden.

Examples of good practice identified

Based on the research conducted, the study team identified examples of good practice in data collection systems at national level, and the main conditions for their transferability. The selection criteria included the following aspects of data collection and reporting: a) the high reliability and robustness of data on monitoring indicators; b) the maintaining of a light and flexible administrative system for the FEAD programme; c) the absence of excessive

requirements or ‘gold plating’; d) reductions in administrative burden and the costs of data collection; and e) due consideration being given to the dignity and non-stigmatisation of FEAD end recipients. The list of good practices identified is as follows:

- A comprehensive monitoring and data collection system that ensures a high level of transparency and an audit trail throughout the full process of FEAD OP implementation and monitoring (BG, GR, PT);
- User-friendly electronic platforms and other e-cohesion solutions that allow real-time monitoring and reporting for all parties involved and ensure consistency and data quality (BE, IT, BG);
- Generation and reporting of monitoring data exclusively on the basis of counting (BG, LT, MT) without any estimates;
- Methodology and guidance for POs as to how the indicator data should be collected, aggregated and reported, in order to ease their reporting process;
- A consistent and unified methodology for calculating the values of FEAD-funded meals, based on informed estimates;
- Delegation of data collection, aggregation and reporting functions to POs and local partners that are directly involved in the distribution of support. Use of informed estimates as the main way to generate monitoring data;
- Use of data from national registers to retrieve sociodemographic data on FEAD end recipients;
- Implementation of the structured survey by an external contractor, applying a mixture of data collection methods (face-to-face and phone interviews) and strategies to reach out to sensitive target groups. Use of structured survey to collect additional information corresponding to evaluation needs identified by the MA.

Collection of data on OP II type programmes

Comprehensiveness and proportionality of data collection systems

All four MSs rely on **bottom-up approaches** to FEAD implementation to ensure that FEAD-funded social inclusion activities address the needs of the target groups – homeless persons, persons who are addicted to drugs, alcohol or medicine, persons suffering from mental disorders, persons with disabilities (Denmark), elderly persons with low income (the Netherlands), newly arrived EU citizens (Germany) and vulnerable EU/EEA citizens (Sweden). The MAs of OP II type programmes use various data collection methods, ranging from counting, informed estimates and external registers to surveys, in order to collect and report on common and programme-specific indicators. In particular:

- Germany and Sweden rely exclusively on **counting** to gather data on output and result indicators;
- The Netherlands uses **external registers** and **surveys**;
- Denmark uses **counting** and other data collection methods, such as **self-reporting**.

In the Netherlands and Denmark, different data collection methods are used for output indicators and result indicators. The Netherlands combines external registers and surveys to collect data on the output indicators, and uses **surveys of end recipients for the result indicators**. Denmark combines counting, informed estimates and self-reporting by POs for the output indicators, and uses informed estimates and **self-reporting via surveys of end recipients** to estimate result indicators. **Surveys of end recipients** not only allow the calculation of values for result indicators, but also **go beyond the minimum requirements** to capture changes in personal situation to provide data for the evaluation of FEAD-funded support measures.

In Denmark, Sweden and the Netherlands, the **small numbers of projects** and POs allow the **simple and smooth collection** of monitoring data, thus avoiding excessive administrative burden on the POs. In Germany, data collection and **reporting from the multiple projects** implemented through the co-operation networks of different partners **is supported by a well-developed IT system** with built-in quality checks used by the MA, beneficiaries and POs. Thus, different approaches to data collection, aggregation and reporting reflect the variety of FEAD implementation arrangements, and ensure the **proportionality of data collection**.

Although the MAs rate data collection systems between 7 and 10 on a scale from 1 = weak to 10 = very good, the study team's analysis reveals **several sources of potential errors** that can hinder the comprehensiveness and reliability of data. The most common reporting errors include the **misinterpretation of programme-specific indicators**, the **miscalculation of participants** when applying a counting methodology to collect data, and the **duplication of entries** or clerical errors. To reduce the risk of mistakes and ensure standardised reporting that **covers all required indicators** and provides comprehensive information on FEAD-funded activities, the MSs employ various types of IT software (Germany, the Netherlands, Denmark), and standardised reporting forms and survey questionnaires.

Clear responsibilities for the various actors involved in data collection and reporting, **limited manual follow-ups** on monitoring data, the **ability to log all changes** made to the data reported by partners and beneficiaries, all contribute to ensuring comprehensive data collection at proportionate costs. However, the MAs reported several weaknesses of FEAD monitoring that hinder the comprehensiveness of data collection. The first is a **lack of uniformity in collected data** on result indicators when multiple methods (self-reporting, phone calls, etc.) are used to assess the number of end recipients who have used the services to which they are referred by FEAD-funded projects in Germany. Second, the **ambiguity of indicator definitions**, and the **misinterpretation** of these by POs when reporting on sensitive target groups (Germany, Denmark). Third, there is a **risk of a lack of response from participants, or of participants giving biased answers** when data is collected via surveys of participants in the Netherlands and Denmark, particularly if participants are interviewed a long time after their participation in project activities, e.g. one year after participation in the project in the Netherlands.

Across OP II type programmes, **surveys were conducted as part of programme evaluations** in Denmark, Germany and the Netherlands. All three surveys were conducted by external contractors, which minimises the risk of receiving biased answers. In Denmark and the Netherlands, structured surveys of end recipients were performed as part of programme evaluations. In Germany, the MA initiated a comprehensive evaluation of FEAD-funded projects. This was based on desk research, two detailed and two short surveys of beneficiaries and POs, as well as 51 case studies. In Sweden a permanent survey template is distributed to all end recipients in order to estimate their level of satisfaction.

Timeliness of data collection

The MAs of all four OP II type programmes **identified the frequency of reporting as being sufficient**. In Germany, **real-time data** are reported by project managers in the ZUWES system using standardised templates. In Denmark, **semi-annual** reporting of data to the MA is carried out, while in the Netherlands the data are reported **annually** to meet the minimum requirements of the FEAD regulatory framework.

In Sweden, monitoring data are reported **monthly through written reports**, submitted to the MA via e-mail. Such frequency of data reporting allows errors to be identified more easily, so that corrections can be made in advance.

Accessibility to POs of IT systems, and data protection

The accessibility of data for monitoring of the FEAD OP II type programmes is ensured by POs as the main providers of primary data in Germany, Denmark and the Netherlands. Given the small number of projects and actors involved in the delivery of FEAD support in Denmark and Sweden, a substantial part of data collection, aggregation and reporting is based on the exchange of information by e-mail.

All MSs that implement OP II programmes have undertaken measures to ensure the adequate **protection of sensitive data**. Germany, the Netherlands and Sweden **do not collect personal identification information**, while Denmark checks personal IDs to establish whether a person is legally resident in Denmark. All countries collect **information on the age and gender of FEAD end recipients**, while origin, housing situation, possible disability or membership of a minority group are considered sensitive data, which are usually available only if self-reported by the end recipient. Sensitive data are protected using encrypted data transfer and access based on predefined rights (Germany, the Netherlands), regular data backup and logging of changes (the Netherlands, Denmark), and the anonymisation of data reported to the MA (Sweden, Germany). The need to comply with the requirements of the GDPR increases the administrative, human resource and time costs of programme monitoring at the level of POs.

Examples of good practice identified

The research conducted by the study team allowed the following examples of good practices to be identified with regard to data collection in OP II type programmes:

- In the Netherlands, the **straightforward OP II data collection system** meets FEAD monitoring requirements by using simple IT tools to collect and report survey data, and standardised questionnaires to ensure the comprehensiveness and comparability of data;
- **Monthly data reporting in Sweden allows mistakes and reporting errors to be identified in a timely manner**, based on standardised forms and close cooperation between the MA and POs;
- Standardised forms are used for interviews and surveys in Denmark and the Netherlands, enabling the collection of more reliable and robust data;
- A comprehensive IT system for data collection and reporting is used in Germany to monitor multiple projects across the country;
- In all four countries, evaluation surveys on end recipients and beneficiaries/POs were conducted as part of the national programme evaluation.

Outlook for the 2021-2027 programming period

In the 2021-2027 programming period, with the integration of FEAD into the ESF+, the **minimum monitoring requirements** for activities aimed at food support, material assistance and social inclusion activities previously funded by FEAD have been **simplified and streamlined**, with a **reduced number of common output indicators**. Informed estimates (such as **simplified sampling approaches** or other methods, including **proxies**) and representative samples, can be used if based on a documented methodology. In addition, **registers** or **equivalent sources** are regarded as an appropriate basis for data collection, aggregation and reporting. In the new programming period, the annual implementation report will be replaced by data to be transmitted through the System for Fund Management in the European Union (SFC).

For the monitoring of the specific objective **(l) ‘targeting the most deprived’**, two types of output indicators are envisaged: the first type comprises those indicators referring to the total number of participants and their breakdown by age, for which data are collected individually along the lines of the 2014-2020 programming period. The other type refers to sensitive data (participants with disabilities, third-country nationals, participants with a foreign background, minorities, homeless people), for which data needs to be collected only when applicable, and only in relevant cases. Moreover, **at least one programme-specific result indicator** must be established to provide an overview of the results achieved.

With regard to the output indicators for the specific objective **(m) ‘targeting the most deprived through food and/or basic material assistance and providing accompanying measures supporting their social inclusion’**, several simplifications have taken place compared with the 2014-2020 programming period. For the output indicators, the distinction has been eliminated between the quantity of meals and food packages distributed, and the obligation to report which types of goods have been purchased. However, **a breakdown of financing with regard to broad target groups (e.g. children, homeless people) has been introduced**. With regard to the result indicators, some adjustments to the breakdowns are foreseen, e.g. end recipients up to the age of 18 are now counted, and there is an additional indicator for youth (aged 18-29 years). For this specific objective, milestones and targets are not required (Art. 16(2) of the CPR). However, a reference value may be used to compare the indicator’s achieved value with past experience. This will usually be based on historical achievements deemed relevant as a comparison. Reference values should be set for a limited number of result indicators³⁴. Programme-specific indicators may also be used.

While the general objectives of FEAD have been retained (i.e. the provision of food and basic material assistance, as well as the social inclusion of the most deprived people), MSs now have greater discretion to define specific rules (e.g. target group, type of intervention). As a result, the variety of activities and indicators may be challenging to aggregate and compare.

Furthermore, in the 2021-2027 programming period, the **use of vouchers** has been envisioned as a form of delivery for FEAD-funded food support and material assistance. Accordingly, a number of common indicators on the use of vouchers have been introduced to monitor end recipients who benefit from vouchers/cards. The **use of vouchers** has several **implications for data collection and monitoring systems**, as well as for the actors involved in monitoring ESF+ assistance to the most deprived. First, the use of vouchers provides reliable evidence for monitoring and reporting. Monitoring the number of

³⁴ Common indicators toolbox. Programming period 2021-2027. Monitoring and Evaluation of European Cohesion Policy. European Social Fund Plus (ESF+) Shared Management Strand. Data Support Centre: VC/2020/014 https://ec.europa.eu/sfc/en/system/files/2021/qed/Toolbox_October_2021.pdf

vouchers distributed and used allows for simple and straightforward data collection and can provide insights on the relevance of support by measuring the proportion of FEAD funding spent by end recipients. Second, end recipients can provide the vouchers at distribution centres or shops to buy food and items for personal use without the need to disclose any personal data to the POs or MA.

The evidence collected shows that vouchers are currently being piloted in Romania. In the new programming period of 2021–2027, Finland and Lithuania will also deliver food and material support to the most deprived using e-vouchers, and other countries may follow. Depending on the arrangements used to implement the voucher-based support system – paper vouchers or e-vouchers, transition to this form of delivery for FEAD support could contribute to **reduced administrative burden on POs**. However, the implementation of a system of e-vouchers would require the involvement of shops and supermarkets (or card providers/administrators of electronic cards) in data collection, aggregation and reporting on common output indicators. The study on e-Vouchers³⁵ concluded that it would be feasible for beneficiary organisations to obtain the common output and results indicators stipulated in the ESF+ Regulation, if the scheme is designed to be compliant with the ESF+ expenditure rules from the outset. Given that managing authorities and audit authorities do not need to control the products that are actually purchased with each e-vouchers, and just need to have ‘sufficient assurance’ that the e-vouchers are only being used to purchase food and/or basic material assistance, audit requirements also do not appear to impose a disproportionate administrative burden on beneficiaries. However, these arrangements need to be put in place from the outset.

Recommendations for the 2021-2027 programming period

Based on the assessment of the comprehensiveness, proportionality, timeliness and accessibility of FEAD data collection and monitoring systems at national level, the strengths and weaknesses identified in the systems currently in place, and the good practice examples, we provide the following recommendations, for the attention of FEAD and ESF+ stakeholders and in particular, the MAs in charge of designing the monitoring system at national level:

1. **Consider the possibility of using a light, estimates-based data collection system** in MS where a bottom-up approach is followed in order to reduce unnecessary administrative burden to partner organisation;
2. Develop **a unified methodology for the estimation and data collection templates** to be used by all POs or the MA to calculate and report the values of common indicators in order to ensure the consistency and reliability of estimated values;
3. Establish **linkages between FEAD monitoring IT systems and national social assistance registers** in order to retrieve the data on the number of end recipients and their sociodemographic characteristics in those cases where eligibility for FEAD support is decided on the basis of information from national social assistance schemes;

³⁵ European Commission, Directorate-General for Employment, Social Affairs and Inclusion, e-Vouchers for the most deprived : a study complementing the ESF+ impact assessment : final report, Publications Office, 2021, <https://data.europa.eu/doi/10.2767/513268>

4. Ensure **direct access or interfaced connection to FEAD IT systems** for POs, in order to reduce administrative burden and contribute to the reliability of monitoring data;
5. Provide IT tools (ranging from **simple, cloud-based solutions to more sophisticated systems**) to report monitoring data where POs lack administrative capacities;
6. Ensure that the monitoring data provided by POs via e-mail or using cloud-based solutions is either anonymised or sufficiently well protected where sensitive or confidential data is concerned;
7. Provide adequate **user guidance on data collection and training** to enable the effective use of methodologies and IT solutions;
8. Provide technical assistance and advice to POs with regard to *ad hoc* issues relating to data collection and the use of IT tools;
9. Perform quality checks on reported data using the IT system's **in-built checks** to avoid the incorrect use of measurements, decimal separators, etc.;
10. Automate **comparisons of data** collected on FEAD/ESF+ funded activities and outputs **with other data sources** through interlinkages to financial data from programme and national social assistance registers;
11. **Maintain light FEAD monitoring arrangements** and avoid national rules that go beyond FEAD legal requirements ('gold plating') especially when such features are not supported by appropriate IT tools. Examples of 'gold plating' include signature confirmation of receipt for support, submission of primary data on end recipients, and the collection of data exclusively on the basis of counting.

To improve the comparability of structured survey data and the appropriate use of survey data for FEAD evaluation, it is recommended to:

12. Consider the possibility of **reformulating the questions** provided in the template of **the structured survey** when they are not easily understandable for non-professionals, including FEAD end recipients, or when they need to fit the specific context of the support provided. However, the structured survey template should be respected and the sense of questions should not be changed in order to allow for aggregation of survey results at EU level;
13. Envisage a **robust methodology for the aggregation and analysis of responses** at national level to ensure the comparability of data at EU level. The availability of descriptive statistics (frequencies and cross tabulations) that provide the distribution of responses by different types of support (food support, material assistance, accompanying measures) and FEAD target groups monitored by result indicators, would allow the meaningful aggregation and interpretation of structured survey results at EU level;
14. **Address identified gaps and inconsistencies** in structured survey data **by using additional research methods**, e.g. analysis of the raw data from structured surveys, focus groups and consultations with FEAD stakeholders at national level.

In addition to the recommendations above, the study team recommends the following actions to improve data collection and reporting on **FEAD social inclusion programmes (OP II type)**, in particular, on **programme-specific result indicators**:

15. Provide **unified templates** and a **methodology** for the collection of data on end recipients that measure the result of the intervention (e.g. engagement in various types of activities, the use of services, change of personal situation, etc.);
16. Consider the possibility of **collecting data on programme-specific result indicators from administrative registers** or other data collected by service providers (e.g. early childhood education and care, health services, employment services, etc.) when this is relevant to the type and objective of FEAD-funded social inclusion activities;
17. Conduct **surveys of end recipients and beneficiaries/partner organisations** at various points in programme implementation. Such regular surveys reduce the risk of attrition, lack of response and biased answers, which affect the value of the programme-specific indicator. These regular surveys may also be a relevant part of national programme evaluations, if carried out.

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