PPMi

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

Interim report

CONTENTS

LIST OF FIGURES

LIST OF TABLES

Introduction

The **Fund for European Aid to the Most Deprived (FEAD)**, worth **€3.8 billion** over the period 2014–2020, entered into force on 10 March 2014, as the European funding instrument to contribute to the Europe 2020 target to reduce poverty in EU. Article 3 of the FEAD Regulation[1] 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".*

FEAD supports the most deprived by providing **material assistance**, including **food**, **clothes**, **hygiene items** and **other essential items** for personal use. This should be **complemented by social inclusion measures**, such as guidance and support to help people out of poverty. National authorities can also support **non-material assistance** to the most deprived people, to help them integrate better into society. By **addressing the basic needs** of the most deprived people in the EU, FEAD provides the **preconditions** for enabling them **to get a job** or **engage in training** supported by the ESF or other funding sources. **Monitoring** is an essential component of FEAD, as **consistent, comparable and good quality data collected by the national authorities** are used to assess the progress of the implementation of FEAD programmes and evaluate the relevance, efficiency, effectiveness, coherence, and added value of the funding. This **Study supporting the monitoring of FEAD** aims to **assess the data collection and monitoring systems of the FEAD programmes at national level** and to identify good practices, both for Operational Programme I and II (OP I and OP II types) implemented in the period 2014-2020 in all participating Member States.

The work carried out under this contract will enhance the Commission's and other stakeholders' understanding of the functioning of the programmes' monitoring systems and will also provide an assessment of the **data reliability** following EU Better Regulation requirements. 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 Member States for the **improvement of their monitoring systems for the 2021-2027 period**.

The implementation of this study kicked off on 17 June. The study team has presented the methodology proposed in the technical offer and discussed it with DG EMPL representatives during the kick-off meeting held on 23 June. On 26 July, PPMI submitted the final version of the Inception report which presented the revised methodology and updated work plan of the study. In parallel, our study team has prepared methodological tools of data collection including Information collection form (see Annex 1) and Data collection guidelines for country experts (see Annex 2).

This Interim report presents an overview of the study implementation and the results of the mapping of data collection methodologies (Tasks 1) and the assessment of FEAD monitoring systems' data collection and data processing arrangements (Task 2). The report summarises the main strengths and weaknesses of data collection systems at national level, the causes of implausible or unreliable data reported and solutions to overcome these,

[1] 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

good practice examples and recommendations for the design and implementation of monitoring systems for the 2021-2027 programming period.

Chapter 1 of the Interim report briefly presents **the progress of the study implementation and data collection process.** That includes the documentary information collected, the development of the data collection tools by the core team and the status of data collection progress. The chapter ends with an overview of the next steps, including reporting periods, activities of Tasks 3 and 4, deliverables and meetings of the Steering Group.

Chapter 2 presents the results of the assessment of the data collection systems in Member States implementing **OP I type (food and material assistance) programmes**. It starts from the **overview of the FEAD data collection systems of OP I type**, including main data collection methods, actors involved in the monitoring of FEAD programmes, frequency of reporting and data quality checks in place. Further, it provides the summary of **strengths and weaknesses identified, analyses the challenges and solutions for reporting reliable and plausible data on OP I type programmes and presents good practice examples identified.**

Chapter 3 presents the results of **analysis of data collection arrangements for OP II type (social inclusion) programmes,** including an overview of the methods and procedures for the data collection on common and programme-specific indicators, reliability of monitoring data, strength and weaknesses identified and best practice examples for OP II type programmes.

Chapter 4 summarises **the key findings** of the assessment both **for OP I and II types.**

The Interim report is accompanied by the **Deliverable 1** ***(MS Excel)*** providing the results of mapping of data collection methodologies (Task 1) and the following annexes:

- Annex 1. Information collection form
- Annex 2. Data collection guidelines for country experts
- Annex 3. Minutes of the Focus Group 1
- Annex 4. Minutes of the Focus Group 2

1. Progress of study implementation

1.1. General overview of activities implemented

During the interim phase of the study implementation, data collection and mapping of the **specific features of FEAD monitoring and indicators** has been conducted to identify the data collection methodologies in all Member States implementing FEAD Operational Programmes (OPs). The study team has compiled this information on data collection methodologies, frequency of reporting and quality control procedures in one MS Excel document to prepare **Deliverable 1** and enable the comparative analysis of Task 2.

As the first step to desk research, the study team collected all the relevant information available from SFC2014. Those were texts of FEAD Operational Programmes, Annual Implementation Reports (AIRs), audit and evaluation reports as well as results of structured surveys. These documents were uploaded by the core team for review by the national experts in the PPMI Own Cloud system as an initial step of desk research at national level. At the next stage, the national experts continuously revised further EU and country-specific documents in order not to burden the Managing Authorities with excessive information requests during the interviews.

The core team prepared the **instructions and tools** to be used by the country experts for information collection. In particular, the core team prepared I**nformation collection forms (MS Excel)** to be used by the national experts, including the data points needed for the study. Tailored information collection sheets were prepared for all FEAD OPs, where each record is used to gather information on a single (common or programme-specific) indicator of the relevant programme. In addition, the core team prepared guidelines for data collection by the national experts, including:

- A short description of the objectives and the scope of the study, and the specific issues to cover;
- Detailed instructions on how to carry out the mapping activities required;
- Introduction letter from the European Commission to be used when contacting the public authorities;
- Template of the first e-mail to the Managing Authority;
- Programme-specific information collection sheet;
- Interview guidelines;
- Relevant legislation and other references.

Information collection form and guidelines for national experts were piloted by the member of the core team collecting information on FEAD monitoring and data collection in Lithuania and during the interview with the Managing Authority. The Information collection form and guidelines were shared with the national experts in the PPMI Own Cloud platform (see Figure 1) and the launch of information collection was announced on the 17th of August.

FIGURE 1. THE INFORMATION COLLECTION PROCESS

The information collection was based on the OwnCloud environment, hosted on the PPMI servers. Individual credentials were made available to the national experts to access the online platform, alongside the URL address. The platform included three sections:

- **Guidelines**: The core team uploaded five guideline documents. Guideline note provided general instructions on how to conduct activities throughout the whole study, including information on the functioning of the platform, explaining the aim and the use of each section. Secondly, the core team provided the data collection form and an interview guideline, describing the purpose of the interviews and including interview checklists targeted to the Managing Authorities. Then, the reference letter to the Managing Authorities from DG EMPL together with a draft email for the initial contact to be used by the national experts was uploaded.
- **Official documents**: The national experts used this section to download and upload relevant documents used to analyse the projects. These documents include: the PDF version of the Operational Programme, Annual Implementation Reports, national regulations, guidelines and any other relevant documents either found through the desk research or provided by the Managing Authorities during the interviews, such as previous study reports. Additionally, the national experts were responsible for uploading in this section the minutes of the interviews carried out with Managing Authorities and details on the names and positions of the people interviewed, date of the interview and location.
- **Contacts:** In that section, the contact details of the Managing Authorities were uploaded in a single PDF file.

The current system provided a reliable and comprehensive collection of data. Further, high consistency between country experts' contributions was ensured by the study team which acted as a helpdesk. The country experts were solicited to provide input on any problems they are aware of, as concerns, data collection and aggregation methodology in their respective Member States.

Source: compiled by the authors.

During the interviews with the Managing Authorities, we followed a semi-structured approach (see Annex 1.), i.e., a standard list of questions was asked along with other, specific questions related to the subject matter. The interviews took place in August–October 2021 and explored some aspects by using open-ended questions leaving room to explain specific context and implications for the monitoring of the programme. Some other issues were covered by giving the respondents multiple options to choose from. We also left flexibility for an open discussion of different specific national factors or other relevant insights of the Managing Authorities. After the interviews, country experts examined additional supporting documentation mentioned by respondents (if any), such as guides on the compilation of indicator data in the cases these were not found or analysed during the initial desk research. Moreover, the interviews were used to collect suggestions for good practices of FEAD monitoring in each Member State. Close coordination was ensured by the side of the core team together with the engagement of DG EMPL which provided contacts of the respective geodesk officers and supported the study team in contacting the Managing Authorities. During the interviews the representatives of the Managing Authorities shared valuable primary data on the different 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 with FEAD Managing Authorities and partner organisations

To broaden and deepen our understanding of the FEAD monitoring data collection and reporting systems at national level, and how they work in different contexts and for different groups, we have arranged **two virtual focus groups** with representatives of the **MAs**, **beneficiaries** and **the partner organisations** in the Member States. These focus groups were conducted on **14 and 15 October 2021** using MS Teams platform. Focus groups were arranged by the data collection method applied for the monitoring of FEAD: the first group of participants mainly represented and discussed monitoring of FEAD using data based on counting and registers, and the second focus group was dedicated to present and discuss experience related to FEAD monitoring based on

informed estimates and surveys of the end recipients (see the minutes of the focus groups in Annex 3 and 4 of the report).

These targeted focus groups were set as complementary to the in-depth interviews with Managing Authorities when identifying the good practice examples of FEAD monitoring and data collection methods. While the interviews enabled discussions on the Managing Authorities' experience, the focus groups, involving representatives from multiple countries and actors involved in FEAD monitoring, enabled us to draw out similar patterns and differences across countries and allowed us to collect a much wider range of opinions on different aspects of data collection and reporting in the context of FEAD monitoring. They offered an opportunity for the participants from Managing Authorities, beneficiaries and partner organisations to interact with each other. That interaction further shaped and refined hypotheses of strengths and weaknesses and the success factors. This was particularly helpful in understanding the specific mechanisms and contexts in each country, and the extent to which these are relevant to other national contexts.

1.2. Progress of data collection at the level of Member State

The Interim report presents results of analysis based on the data collected on all 27 Member States. Some MAs opted for written responses to the interview questions thus resulting in need for further exchanges and clarifications between the country expert and the Managing Authority. Also, the level of details on data collection methodologies provided by the Managing Authorities differed. While for most of the MSs the data was available at the level of the indicator, for Ireland, Spain, Luxembourg and the Czech Republic the data at the programme level was mainly collected to meet the minimum requirements for the information to be included in the Deliverable 1.

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

The Table 1 below presents the progress of the data collection at the level of Member States to the submission of the interim report.

TABLE 1. DATA COLLECTION PROGRESS

COUNTRY	TYPE OF ASSISTANCE	PROGRESS OF DATA COLLECTION	PARTICIPATION IN FOCUS GROUPS
Austria	Material assistance	completed	
Belgium	Food	completed	√
Bulgaria	Food	completed	√
Croatia	Food, Material assistance	completed	
Cyprus	Food, Material assistance	completed	
Czech Republic	Food, Material assistance	completed	
Denmark	Social inclusion	completed	
Estonia	Food	completed	
Finland	Food	completed	√

France	Food	completed	√
Germany	Social inclusion	completed	
Greece	Food, Material assistance	completed	√
Hungary	Food, Material assistance	completed	
Ireland	Food, Material assistance	completed	
Italy	Food, Material assistance	completed	√
Latvia	Food, Material assistance	completed	√
Lithuania	Food, Material assistance	completed	
Luxembourg	Food, Material assistance	completed	
Malta	Food	completed	√
Netherlands	Social inclusion	completed	√
Poland	Food	completed	√
Portugal	Food, Material assistance	completed	√
Romania	Food, Material assistance	completed	√
Slovakia	Food, Material assistance	completed	
Slovenia	Food	completed	√
Spain	Food	completed	
Sweden	Social inclusion	completed	

Source: compiled by the authors.

1.3. Next steps

Task 3: Organisation of the workshop with stakeholders

The objective of Task 3 is to implement a half-day online workshop to present the results of the Tasks 1 and 2 (particularly methodologies of FEAD data collection and the evidence-based insights and assessment of FEAD monitoring systems' data collection and data processing arrangements). These findings will be presented in a structured manner and discussed with stakeholders involved in the subject of the study (e.g. representatives of relevant national stakeholders – Managing Authorities, Intermediate Bodies, beneficiaries and the main partner organisations – and Commission officials). The workshop is expected to take place in January and will follow the approach developed by the study team and discussed with DG EMPL after the submission of the Interim report.

Task 4: Final report

The objective of Task 4 is to put together findings from Tasks 1 and 2 as well as the conclusions of the workshop under Task 3 and the feedback from consultations with the Commission into a draft analytical report presenting them in a concise and reader-friendly way understandable to a non-expert reader. The final report (maximum 60 pages) will contain the final conclusions and recommendations to the Member States and the European Commission. The draft final report will be delivered 6 months after the signature of the contract and discussed during an Inter-service Steering Group meeting. The final report will be delivered in January 2022. Findings, conclusions and lessons will be presented by the type of OP (I and II). The final report will be accompanied by the executive summary in English, German and French. The executive summary will be of maximum 2 pages.

2. Data collection systems for FEAD OP I type programmes

FEAD-funded Type I operational programmes (OP I) 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. In addition to food, these programmes also deliver basic material assistance in the form of school supplies and hygiene items and other essential items for personal use. Type I OP is widespread across the EU, as 23 out of 27 MS implement this type of OP. Under this OP, Member States also provide **accompanying measures** complementing the provision of food and material assistance aid with guidance and reference to social inclusion support. The monitoring and evaluation of OP I programmes relies on several indicators – input indicators (common for both OP I and OP II) as well as common output and result indicators.

2.1. Data collection arrangements

In 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 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 (electronic);
- 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 setting minimum requirements for audit trail requires a reliable (and documented) system for collecting, recording and storing data for monitoring, evaluation, financial management, verification and audit purposes. Further, "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)). Each Member State must comply with the regulation at the European level for monitoring purposes. To encourage a more unified and consistent approach to the monitoring of FEAD, the EC services have also prepared and published a guidance fiche[2] providing explanations and interpretations of the monitoring requirements set by FEAD regulatory framework. However, both the legal framework and the guidelines leave room for the MSs to decide on the arrangements for the collection, processing and reporting of monitoring data at national level. This resulted in a variety of data collection systems developed by the MS that reflect the different approaches to the delivery of FEAD assistance and specific features of national support schemes and implementation modes.

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

Implementation arrangements across OP I type programmes allow for clustering of FEAD operational programmes based on the approach to decide on the eligibility for FEAD support, number of partner organisations (POs) and beneficiaries involved in the delivery of FEAD assistance and IT systems and tool used for the data collection, reporting and monitoring of implementation (see Table 2). Most Member States apply **top-down approach** to decide on 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 person's or household's eligibility to be included in national social assistance / minimum income support schemes. On the other hand, several Member States (AT, BE, FI, IT, FR) apply **bottom-up approach** to the implementation of FEAD OPs when eligibility for support is identified at regional and/or local level or at the discretion of partner organisation directly involved in the distribution of food and material support. In most cases, no specific prove of eligibility is required from support recipients, when FEAD OP implementation relies on bottom-up approach.

TABLE 2. IMPLEMENTATION ARRANGEMENTS OF 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[3] system
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 (https://eumis2020.government.bg/en)
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	Social benefits recipients	Top-down approach	Small (1)	Ongoing implementation of e-cohesion system
ES	Persons in need of food support	Top-down approach	2 POs coordinating large number of beneficiaries (5633 in 2020)	Ongoing integration in 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 email.

[3] E-cohesion IT systems allow for all-electronic exchange of information between beneficiaries, Managing Authorities, Certifying Authorities and Audit Authorities.

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 email.
IE	Persons living in deprivation	Top-down approach	Large (158)	Comprehensive e-cohesion system
IT	Persons living in deprivation	Bottom-up approach	Large (10022)	Ongoing implementation of e-cohesion system
LV	Disadvantaged and vulnerable individuals, children affected by or at risk of poverty	Top-down approach	Moderate (26 in 2021)	E-cohesion functionalities available only for the Intermediate Body, MA, CA and AA.
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 https://eplsafis.socmin.lt
LU	Disadvantaged and vulnerable individuals or households as established by the social services	Top-down 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
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 (3185)	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.

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

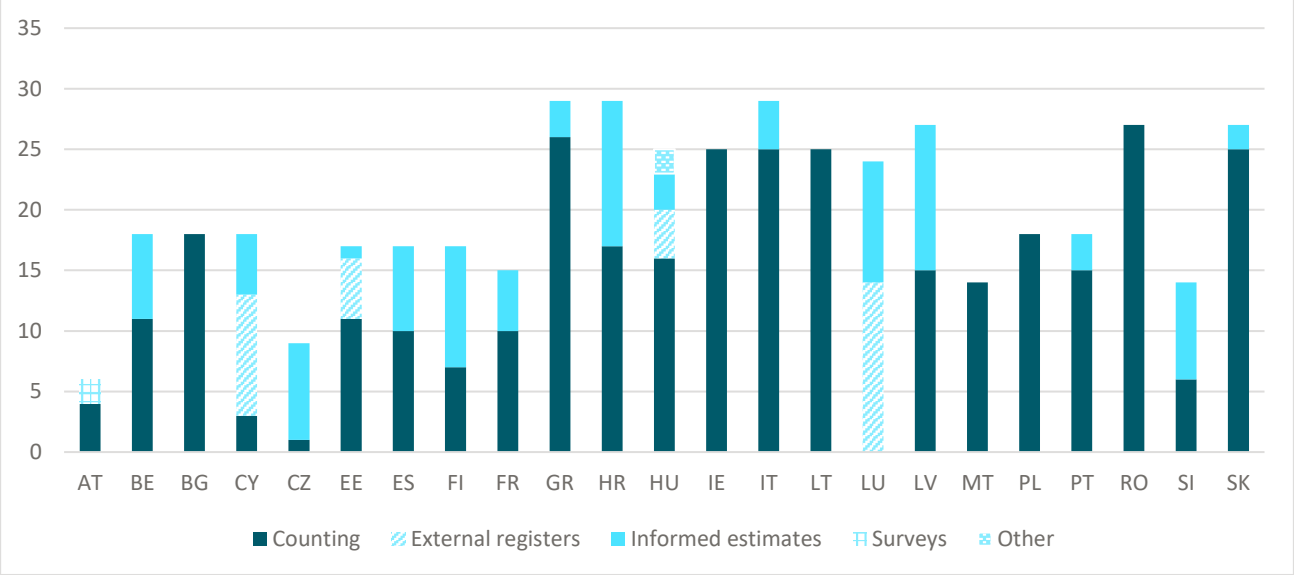
reporting. In Belgium, Bulgaria, Ireland, Italy, Spain, Poland, Portugal and Romania, multiple and diverse partner organisations and beneficiaries distribute FEAD support and generate primary data used to monitor FEAD implementation. In other countries the number of POs varies from small (1-5) to moderate (60-70). In this context, also important are IT systems and other tools used for the monitoring of FEAD implementation and reporting data on FEAD support. These differ across Member States varying from paper forms used by some front-line organisations and POs (e.g. in PL) and data submission by e-mail (spreadsheets or scanned documents) to cloud-based solutions (BE), interoperable IT tools (IT) and comprehensive e-cohesion systems (BG, GR, LT, etc.) partially or fully accessible to bodies and organisations involved in FEAD implementation and monitoring.

Implementation arrangements of FEAD OPs presented in Table 2 are directly related to the methods and procedures for the data collection and reporting on FEAD common output and result indicators. The following sub-chapters present an overview of data collection and reporting arrangements for OP I type programmes and summarise the strengths and weaknesses of the different methods applied by the MS, also considering the differences of implementation models described above. Based on the analysis conducted, we identify the best practice examples for the aspects of the monitoring data collection, processing and reporting to meet the legal requirements on FEAD monitoring.

2.1.1. Data collection methods

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 of FEAD funded OPs in Bulgaria, Ireland, Lithuania, Malta, Poland and Romania are reported based on counting. Other MSs apply an approach based on a **mix of data collection methods** (see Figure 2).

FIGURE 2. DATA COLLECTION METHODS ON OUTPUT AND RESULT INDICATORS, OP I



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

Analysis of quantitative and qualitative information on data collection methodologies at national level showed 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 support distributed. Values of **common result indicators** are usually **counted** when FEAD support is distributed based on 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 top-down approach to FEAD OP implementation, have ex-ante set eligibility criteria for FEAD support related to national social assistance schemes, involve regional and municipal institutions as POs or a limited number of non-governmental partners in charge of reporting the monitoring data to the MA. Also, MSs that mainly rely on counting usually have developed comprehensive IT systems and tools to collect, process and store FEAD monitoring data.

Informed estimates are mostly used to generate the data on FEAD end recipients (i.e. common result indicators) when MS apply bottom-up approach to FEAD OP implementation (e.g. BE, FI, IT), and FEAD support is distributed via 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 prove of eligibility for FEAD support. Also, in some cases **informed estimates** are used to collect the data on the following **common output indicators** on food support:

- the total quantity of food support distributed and quantity of different types of products used to prepare **school meals** in Cyprus;
- **the proportion of FEAD co-financed food products** in the total volume of food distributed by the partner organisations 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.

Estimations as a data generation method are often based on educated guesses of volunteers and staff of partner organisations (in Belgium); extrapolation of data registered on a sample of distribution days (in Finland); extrapolation of data collected by a polling firm (France); 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, partner organisation inputs data in the platform, where all students receiving FEAD support are registered and then reported;
- in Hungary, the national social benefits register (STAR) is used to generate the initial list of eligible end recipients and estimate the sociodemographic 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, that is obtained from social benefits registers.

Analysis of the data collected for the study shows that national social benefits registers are also used in some other Member States, e.g. Greece, Lithuania, Latvia, Malta, however only as a source to identify eligibility for FEAD support and draw details from them on age, gender and other sociodemographic characteristics of actual FEAD end recipients which are counted (in Lithuania and Malta) or estimated (in Latvia) by partner organisations. Also, data from external registers are used to cross-check the data on FEAD end recipients generated and provided by POs using estimations (e. g. in Latvia).

Other data collection methods reported by Hungary include a combination of these approaches to identify the number of different target groups benefitting from FEAD support. Though in general the external registers are used to report the data on FEAD end recipients, the number 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.

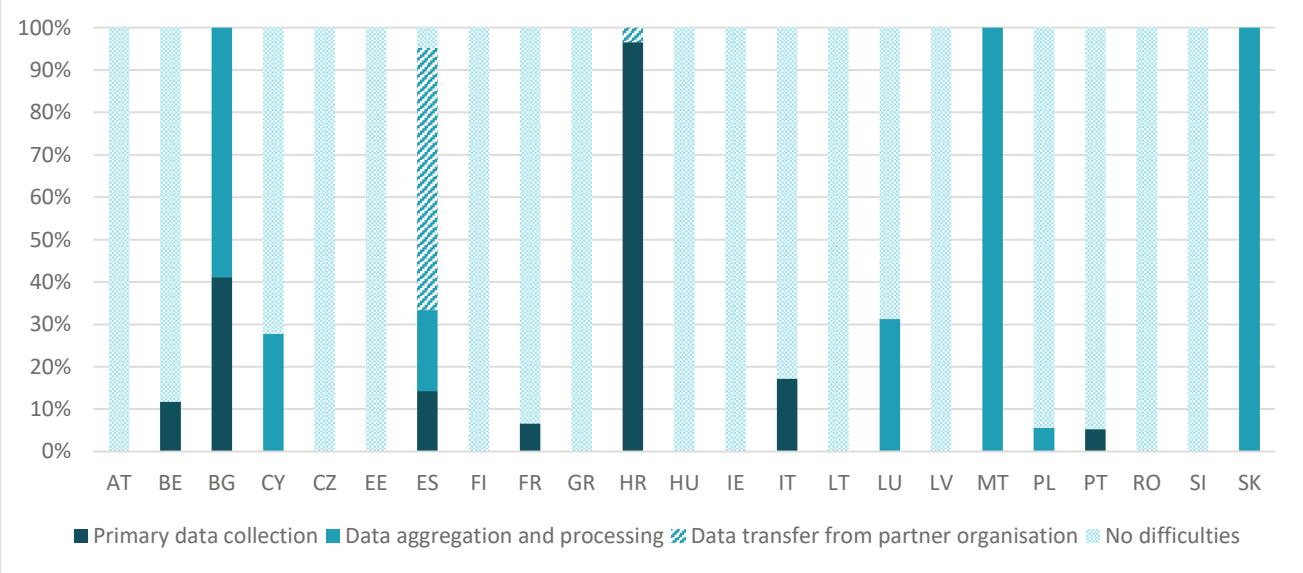
Using informed estimates for reporting the number of homeless in Hungary

In Hungary, a special project is dedicated only to the homeless and the distribution of all the warm meals under the Operational Programme is set for that project. In that way, 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) running the project together with 84 partner organisations, ensures the ease of the data collection. Even though identity documents are being requested from the homeless persons, in a lot of the cases, they could not present such. Then, the representatives of the partner organisation record their names and birth dates based on their narrative. Gender, disability and foreign background status are recorded based on the estimation from the staff.

Finally, in Austria, **surveys** are used to collect the primary data on common result indicators related to sociodemographic characteristics of 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 the Roma) that receive material assistance.

Our analysis showed that in most cases reporting on FEAD OP I type programmes does not cause difficulties to the MAs (see Figure 3). Challenges identified by country experts were mainly related to primary data collection (BG, HR, to less extent in BE, ES, FR, IT and PT) and data aggregation and processing (BG, MT, SK, to less extent CY, ES, LU and PL). In Spain, difficulties in transferring the data from partner organisations were identified mainly due to multiple front-line organisations (the second level POs) which report data to the first level POs – Spanish Food Bank Federation and the Spanish Red Cross.

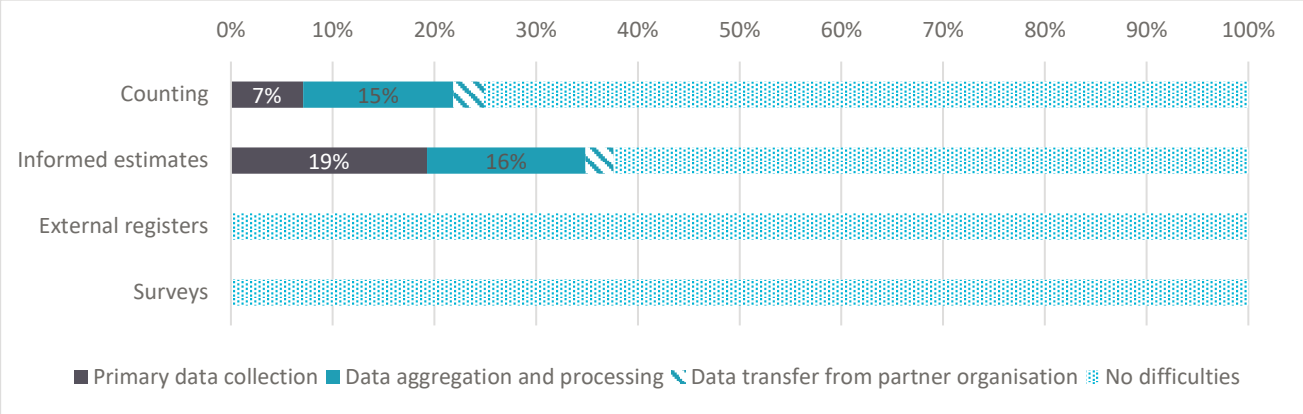
FIGURE 3. DIFFICULTIES OF REPORTING ON FEAD OUTPUT AND RESULT INDICATORS OF OP I TYPE PROGRAMMES



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

The results of our analysis showed that the difficulties of data collection and reporting on FEAD OP I indicators are related to data collection methods. Primary data collection is seen as more complicated and challenging when the informed estimates are used, while data aggregation and processing and data transfer from POs cause difficulties to an equal proportion of input and result indicators for which data is generated using counting and the informed estimates. For common input and result indicators reported based on the data from the external registers and surveys, no difficulties were identified (see Figure 3).

FIGURE 4. DIFFICULTIES OF REPORTING ON FEAD OUTPUT AND RESULT INDICATORS BY DATA COLLECTION METHOD



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

Analysis of qualitative information collected during the interviews and focus group discussions showed that the informed estimates are particularly difficult for partner organisations when they estimate the amount of the different types of food distributed and some of the common result indicators on FEAD end recipients belonging to sensitive target groups such as migrants, participants with a foreign background, minorities, persons with disabilities and the homeless:

- In Belgium, the interpretation of the definitions for the common result indicator of food support to migrants, participants with a foreign background, minorities (including marginalised communities such as the Roma) is considered problematic as the partner organisations often do not know how to report on persons with **overlapping citizenships**.
- In Italy, the reporting on common **result indicator on the persons with disabilities** was identified as challenging as the volunteers from the partner organisations find it hard to detect whether the end recipients have disabilities according to the national legislation.
- In France, the data on FEAD end recipients such as migrants, participants with a foreign background, minorities and persons with disabilities are neither collected nor estimated due to the sensitivity of these personal details.
- Though there were no major difficulties identified in Latvia, the Managing Authority considers the current data collection method too costly in terms of resources as the estimation is based on MA's desk research, externally contracted surveys and reconciliation of these data with the data of the external register and values of output indicators reported by POs.

When **counting** is applied to collect the data on FEAD OP I type implementation, the challenges identified by the MAs were mainly related to the different levels of data aggregation and processing, including the format of data reported, lack of IT tools accessible to partner organisations, timeliness of data collection and reporting, administrative burden to partner organisations. These challenges of data aggregation and processing were equally relevant to OP I type indicators reported based on the informed estimates.

Though used to a limited extent, **surveys** as a data collection method do not cause difficulties for the monitoring of FEAD OP I programme when used for the primary data collection (AT, FR). However, as an additional tool to crosscheck the data reported by POs (LV), surveys pose additional costs to FEAD implementation. Use of **external registers** is considered a straightforward and easy way to generate the monitoring data and cross-check the data collected using other methods (counting or informed estimates). There were no difficulties identified while using external registers for generating monitoring data.

2.1.2. Bodies responsible for data collection on FEAD support under OPs I

Based on the data collected by the study team at national level, **the partner organisations** and **beneficiaries** provide most of the data on the common output and result indicators across OP I programmes.

Regulation (EU) No 233/2014 sets **the beneficiary** as a "public or private body responsible for initiating or initiating and implementing operations" and **the partner organisation** as "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 that undertake activities aiming directly at the social inclusion of the most deprived persons, and whose operations have been selected by the managing authority in accordance with point (b) of Article 32(3)". Thus, the use of the terms in the study is trying to reveal whether there is an additional level of reporting, where the beneficiaries represent the first and the partner organisations the second level of implementation, data collection and reporting.

Our analysis showed that the requirement of FEAD legal framework for setting clear responsibilities and roles of actors involved in data collection and transfer is being followed and well established across the different FEAD OPs I. The actual responsibilities of the actors involved in the FEAD implementation at national level also depend on **the type of assistance provided** and **the indicator** considered.

The analysis showed, that the quality and reliability of data reported by partner organisations and beneficiaries strongly depend on the **administrative capacity** of these actors, the **human resources** available to these organisations and **experience** both in delivering assistance to FEAD end recipients and meeting the requirements related to distribution and monitoring of FEAD-funded support. Desk review of the annual implementation reports revealed that Hungary, Italy and Romania reported challenges related to monitoring and collection of data on end recipients, and lack of capacities of partner organisations impeded the implementation of FEAD OP I type programmes in Hungary, Italy and Poland.. Analysis of the information shared by interviewees from the FEAD MAs and participants of focus group discussions showed that in cases when the data are collected and reported by volunteers in the front-line organisations, the MAs face difficulties related to the regularity of reporting, the delays in data collection and the reliability of the data more often. The turnover of volunteers and staff in the partner organisations pose an additional burden on the implementation and monitoring of operational programmes at the PO level or even cause the withdrawal of some smaller partner organisations from FEAD support schemes. However, the data collected by the study team showed that an administrative burden and turnover of staff and volunteers in POs are interdependent. According to the experience shared by the representative of partner organisation during the focus groups discussion, the administrative burden posed by the national rules for implementation of FEAD (e. g. data collection based on counting exclusively, submission of lists of end recipients with their signatures to proof the delivery of support) have forced some of the staff of the POs to leave the positions (e.g. in Poland). Other food support and material assistance schemes with less administrative requirements to be followed, e. g. the redistribution of donated food or food and other material assistance collected during the collection events in supermarkets are less burdensome for POs in terms of accountability and monitoring requirements.

Data collection, aggregation and reporting can also be expected to be more complex where **numerous and diverse organisations are involved**. In this regard, a very high number of partner organisations - at least 300 - have carried out operations subsidised by FEAD since 2014 in the Czech Republic, Belgium, Bulgaria, Portugal and Romania. Our analysis showed that the capacity to monitor FEAD operations vary across partner organisations as well as territorial affiliated organisations and this cause errors and lack of accuracy in data reported to the MA. Accordingly, the MAs made additional efforts to establish reporting systems and quality control measures to ensure that only reliable data are aggregated and reported to the EC, e.g.:

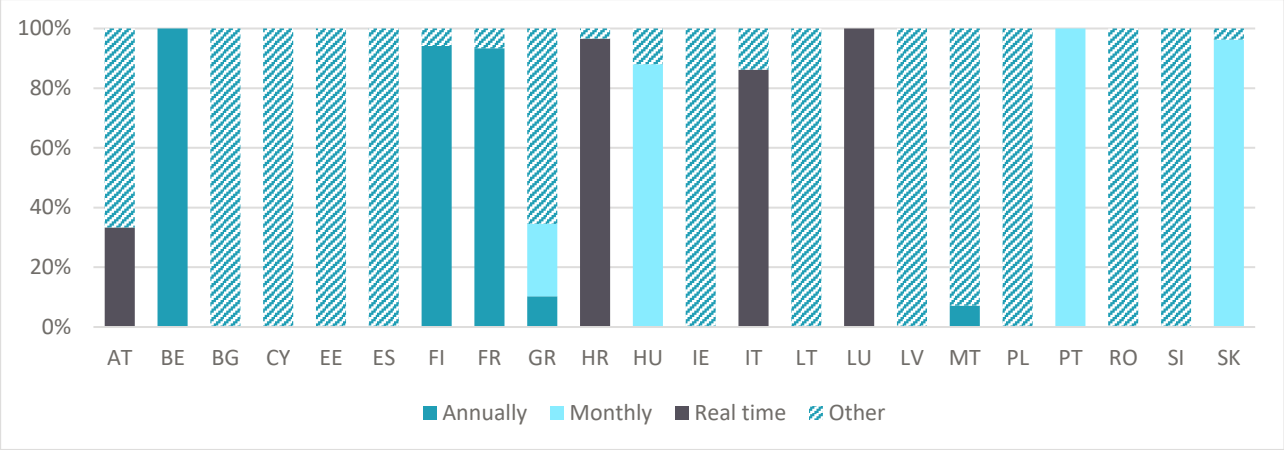
- In Belgium, where only two POs use electronic systems for data collection and the rest ~750 partner organisations use paper forms for data collection, the MA has developed a simple and inexpensive cloud-based reporting tool to submit the monitoring data in spreadsheets format.
- In Bulgaria, a high level of uniformity is based on the fact that the partner organisations are municipalities that report the data via a single system (EUMIS).
- In Italy, the first level data about end recipients are collected in real-time by POs through the centralised SIFEAD platform or through the decentralised POs own IT systems which have interfaces with SIFEAD for transmission of data. In 2018, the MA met periodically with the 7 main POs and with the 199 leading POs to explain to them how to collect data through the IT system SIFEAD. The MA also provides technical assistance and support to POs by providing guidance material.
- In Portugal, where the IT system (SIFEAC) is used by all the partner organisations from their initial application to participate in FEAD onwards, the MA developed a manual to explain how this IT system works and the different steps to insert and upload data. Also, specific training actions were organised for all POs.

To ensure the audit trail of FEAD implementation and consistency and reliability of data collected, guidance and user manuals on data collection and processing were 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 indicators. The guidelines are also reviewed and updated during programme implementation to reflect the changes in data collection tools and systems (e.g. in Greece, the MA prepared a Guide for Completing the Indicator Achievement Form in February 2021 which replaced the earlier instructions of data collection). Our analysis showed that the lack of guidance and/or user manuals for 39 % of output and result indicators can be explained by the fact that rules of data collection were set in legal acts on FEAD implementation and funding requirements, and MAs do not see the need to develop additional guiding documents. Also, in some countries (e.g. Finland) the MA performs in close cooperation with POs and provides clarifications and guidance by request. Though the absence of user-friendly and up-to-date guidance increases the risk of mistakes and misinterpretation in the process of data collection and reporting, information collected by the study team does not allow for establishing causal links between lack of guidance and reliability of data reported. Availability of additional guidance is rather seen to ease implementation and monitoring of FEAD support and reduce the administrative burden for POs caused by FEAD monitoring requirements.

2.1.3. Frequency of reporting

The analysis of data collected for this study showed that at national level most of the reporting on the common output and result indicators of OP I type programmes is being linked to claims for reimbursement submitted by POs and beneficiaries to the Managing Authorities rather than conducted on a regular time periods. The frequency of the reporting may vary from bi-monthly, quarterly to semi-annual depending on the type of assistance provided and reporting rules set at national level. In Hungary, Portugal and Slovakia the reporting is organised monthly, while in Belgium, Finland and France, annual reporting was set (see Figure 5).

FIGURE 5. FREQUENCY OF REPORTING ON COMMON OUTPUT AND RESULT INDICATORS, OP I



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

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

- In Belgium, Finland and France where FEAD implementation relies on the bottom-up approach annual reporting allows to meet the minimum requirements of FEAD regulation with no excessive administrative burden to POs;
- In Italy, despite 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; the data on sensitive groups of FEAD end recipients which are non-frequent users is uploaded after the first distribution of each month;
- In Greece, where FEAD implementation arrangements feature the 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 on FEAD online platform and annually for the Indicator Achievement Report, however, details on quantity of different food categories distributed are available in real time; also, some indicators e.g. proportion of FEAD co-financed food products in the total volume of food distributed by the POs; total number of meals and total number of food packages distributed are reported annually;
- In Hungary, the reporting on most of indicators is arranged on a monthly basis, however in case of 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, beneficiaries report the data on FEAD implementation monthly through FEAD information system (SI FEAC) that allows the registration of physical and/or financial execution, the collection and processing of physical and financial execution data, the certification of expenditure, as well as carrying out audits, monitoring, and evaluation;
- In Slovakia which also applies top-down approach to FEAD implementation, monthly reporting takes place 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 between the financial input and the support provided the end recipients, and timely identification of inconsistencies and mistakes in monitoring data reported. In general, the MAs responded they considered the frequency of reporting on FEAD common output and result indicators to be sufficient for their monitoring systems. However, excessive reporting requirements (e.g. monthly or weekly reporting), especially if they are not linked to the claims for reimbursement and reporting is not supported by well-developed electronic information systems, pose an additional burden on POs.

2.1.4. Protection of sensitive data

Reporting on FEAD end recipients and their sociodemographic characteristics raises a number of questions related to personal data protection, dignity and non-stigmatisation of persons supported, and overall safety of data. MAs of FEAD OP I type programmes apply different approaches to address these complex issues.

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

In **Lithuania**, the MA applies a similar approach and **aggregated data** only (number of the person and her/his socioeconomic factors) **are accessible to** the Managing Authority. In this way, the personal information of FEAD end recipients is only available for social workers in the local area. The number of end recipients represents unique people (after verification with the data in SPIS register) and reflects all the members of households. Regarding the sensitive data on belonging to the particular groups of people such as homeless people, migrants, Roma people or people with disability, data is provided by the end recipients themselves and/or the social workers who also checks the data and ensure its reliability.

In **Estonia**, end recipients shall be eligible for social benefits to receive FEAD support. There is a national register of which 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 reporting of the result indicators is conducted by the usage of informed estimates. In 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 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 partner organisations and the Managing Authority minimising the administrative burden for both. Based on the previous remarks, however, the Managing Authority should consider and ensure that the privacy requirements for the end recipients are met and whether the set target group could be sufficiently reflected by the deployed external registry.

The **Finish official registry** (where the data is stored) is protected from physical dangers such as humidity, physical non-authorised access and does not provide for data migration and format. Only aggregated data is transferred to the Managing Authority. The reliability of data on household composition in Finland depends on the information provided by the end recipients as there are no eligibility requirements for food assistance. Data on end recipients are **collected at the local distribution centre level** during sample distribution days. The number of end recipients reported by the partner organisations and beneficiaries are estimate-based and cross-checked to the amounts of the food output. Such an approach gives way to possible double-counting of the result indicator, whilst the FEAD requirements explicitly stipulate that unique end recipients should be counted on an annual basis.[4] In some cases, the credibility of the data could be also affected by the **volunteering system** which is used at a local level. As volunteers might reduce the administrative burden, data provided by them could be improved by introducing more training on sensitive data collection for the newcomers.

[4] See Monitoring under FEAD. Guidance fiche. 12.05.2015.

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

Integrated information system in **Greece** also provides for a comprehensive record of **all individual characteristics of beneficiaries including age, gender and whether they are camp residents. Information on whether the end recipients belong to minority/Roma, are disabled or homeless (indicators 14 (d, e, f) and 19 (d, e, f)) could be extracted since 2020**[5]. The Managing Authority monitors the ever-changing number of Beneficiaries through the Warehouse Inventory Monitoring web-platform, which is connected with the Minimum Guaranteed Income (FEAD monitoring system integrated into national system) online platform and is updated with the beneficiaries' data. There is no indicator in the Regulation that considers the composition of the household. Both the partner organizations and the Managing Authority have at all times an absolute overview of the Beneficiaries, with full details of them which shows a different practice of using end recipients data. In terms of data privacy, data collection is carried out with adequate privacy protection, updated monthly. **Data is checked electronically**, with verification and cross-checking of data from other platforms as well which makes it more accurate and reliable.

Protection of sensitive data is a key factor in **Portugal** where estimations on vulnerable target groups are provided to Managing Authority. **Data on migrants, people with disabilities, or people in situations of homelessness are estimated by the partner organizations**, which in the Portuguese case are the social security institutes (SSI) allowed to collect personal and sensitive data of people. National information system SIFEAC in Portugal is also linked to the SSI information system, however, the MA can retrieve only non-sensitive data on FEAD end recipients from it.

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

In **Croatia**, project beneficiaries collect end-recipients data following personal data protection legislation and the dignity of the person is protected. In the calls related to school meals, the project partners (schools) keep records of pupils who have a free meal within the project, but the managing authority neither collects nor store 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 groups and how much be each. However, the **only intermediary body has access** to their personal data and their identity is protected through a system of coding.[6]

[5] FEAD Annual Implementation Report – OP I, Greece, 2020

[6] Once the people are identified for FEAD assistance, their identity is protected through a system of coding. The Intermediary Body sends the number of persons who are eligible to the Managing Authority who issue the slips used to collect the food packages with the code. The Intermediary Body then sends the slips to the persons eligible. When these persons collect the packages their slips are collected. This was the identity of those eligible remains always within the Intermediary Body which is entitled to have such data. On the other hand neither the Managing Authority or the Partner Organisation will have access to their identity.

In **Latvia**, the result indicators are collected by estimation based on the annual reports by partner organisations and comparison with statistical data and socio-economic situation in the country (ensured by the Managing Authority). Neither personal data on end recipients nor the composition of their households is recorded by the programme and no identity documents are asked or stored. The programme only makes the **overall social portrait of the end recipients** that is based on the **information given by the end recipients** themselves thus fully respecting their privacy.

In **Hungary**, the total numbers of persons receiving food support are recorded at the distribution sites. **Data on recipients age and gender** - the list (and details) of the eligible end beneficiaries are **from national registries, except for homeless people**. Their names and birth dates are recorded based on their narrative and the interviews are to take place in a more private environment. For more accurate data, sampling is also performed and the data obtained are compared with the records. In the case of outputs as **man/woman, disabilities, foreign backgrounds** the data is recorded after the **staff members' estimations**. Official data on the indicator of socio-economic background is not available except for persons with disabilities.

In **Italy**, 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 should not be above 40 per cent. In the case of frequent users of FEAD assistance (benefiting for longer than 6 months) data is collected by opening a separate file with information **on name, surname, household composition and other data based on** self-reporting. Managing Authority aims to enable end recipients' access to other social services. In case people have access to FEAD for longer than 1 year, they must show **a declaration attesting their living conditions (sensitive data),** however, data are not shared on a national platform. The MA collects fiscal codes to make sure end recipients are existing human beings. Overall, more privacy is kept for non-frequent users regarding personal data in Italy, however, in case of long time support provided it is required to share more personal data mainly for better adaptation of social assistance.

An overview of FEAD data collection arrangements to ensure that personal and sensitive data on FEAD end recipients are sufficiently protected showed that these data (if collected for the purpose of monitoring and reporting) is usually stored and accessible only at the lowest level of FEAD implementation structure, i.e. POs or frontline organisations. Beneficiaries, Intermediate bodies and the MAs in most cases do not have access to primary data on FEAD end recipients - anonymized numeric data are reported to them by POs.

2.1.5. Structured survey under OP I type programmes

Article 17 of the Regulation (EU) No 223/2014 set the requirements that the Managing Authorities of OPs I shall carry out structured surveys of the end recipients in 2017 and 2022, in accordance with the template adopted by the Commission on 18 April 2016 by the Commission Implementing Regulation (EU) 2016/594. The structured survey of FEAD end recipients aims at gaining insights into their socio-economic background, current and past situation and their views on FEAD assistance. Though the results of this survey can be used by the MA to conduct evaluations and draw lessons learned at national level, its primary aim is to allow aggregation of survey results at EU level to feed into FEAD mid-term and ex post evaluation conducted by the EC.

The analysis of data collected for this study showed that in 2017 structured surveys were conducted for all OP I programmes, following the provisions of the Commission Implementing Regulation (EU) 2016/594 and

Guidance note on FEAD structured survey[7]. However, the actual implementation of structured survey and data collected varied across Member States despite the unified template and methodology envisaged in the Implementing Regulation and EC guidance. Our analysis showed that most MAs contracted external providers (e.g. private survey companies) to conduct the structured surveys. However, some countries applied different approach, e.g. in Malta, the survey was implemented by the National Statistics Office, and in Belgium the structured survey was conducted by the POs, and no trained interviewers were involved; also in France the survey was mostly conducted by volunteers of the POs consulted by the polling companies and institutes (see Table 3).

TABLE 3. APPROACH TO STRUCTURED SURVEY AND 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 consulted by 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	N/A	Face-to-face	Yes	No	No	N/A
IT	External contractor/MA	Face-to-face	Yes	No	Yes	N/A
LT	External contractor	Both	Yes	Yes	Yes	Yes
LV	External contractor	Both	Yes	No	Yes	Yes
MT	National Statistics Office	Face-to-face	Yes	N/A	Yes	N/A
PL	External contractor	Face-to-face	Yes	No	Yes	N/S
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.

While direct involvement of POs in the implementation of structured survey allows to easily approach FEAD end recipients including the most sensitive groups and generate better response rate, it also poses certain risks, e.g.:

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

- non-anonimysed 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 increase the risk of biased responses provided by end recipients;

- lack of professional knowledge and adequate training to carry out surveys increases the risk of of methodologically inconsistent approach and misinterpretation of questions by interviewers, which affects the quality of data collected through the structured survey;

- 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 considered, only in four MS (Austria, France, Lithuania and Slovakia[8]) children receiving FEAD food and/or material support were interviewed. The Guidance note on FEAD structure survey[9] envisages that in case the end recipient is a child, the responses should be obtained from parent(s) or from an authorised representative. However, voicing the opinion of children is also important, especially in the context when child poverty and material deprivation is on the top of political agenda[10]. In 2017, Member States which interviewed children as end recipients of FEAD support take into consideration the age of children and their knowledge of received FEAD support. For instance

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

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

Our analysis showed that other challenges identified by interviewers were questions of the structured surveys that were difficult to understand or irrelevant to the end recipients, need for additional explanations or clarification, asking additional sub-questions, time of survey implementation.

For example, the summary of 2018 structured survey in **France** points out that the period in which the survey was carried out - from December to February 2018 - influenced the results of the survey, as the type of assistance requested in the centers differ depending on the time of year. In September, at the start of the school year, more stationery and school bags are distributed to children. Likewise, the help requested during the holiday season relates to access to gifts or clothes. Furthermore, the very specific vocabulary of the questionnaire led to understanding difficulties, both for the volunteers and for the end recipients. Finally, the realization of this survey caused additional burden to the partner organizations since they organized

[8] In France and Slovakia respondents of age group 16-24 years constitute accordingly 6.1 % and 4.1 % of all respondents of 2018 structured survey, and no respondents of age groups 0-15 were interviewed.

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

[10] 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). ECG aims to address the socioeconomic vulnerability of children in Europe through an integrated approach seeking to ensure that all children in Europe are guaranteed access to free and good quality early childhood education and care (ECEC), education and healthcare, **good nutrition** and decent housing.

preparatory meetings before launching the survey and travelled to the distribution points in order to explain to the volunteers the methods of carrying it out.

Sourse: Résultat de l'enquête 25tructure sur les bénéficiaires finaux du Fonds européen d'aide au plus démunis, Paris, 28 février 2018.

Differences in survey methods applied across the OP I type programmes as well as challenges experienced by the 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 as well as coverage of sensitive target groups by the data collected varies across the MSs (e.g. frequency of responses provided either for all respondents or by the age group). Thus, users of structured survey data should consider national contexts of FEAD support distribution (i. e. type of support, specific target groups, support distribution schemes) and implementation of structured survey as well as address identified gaps and inconsistencies in data using additional research methods, e.g. analysis of the raw data of structured surveys, as well as focus groups and consultations with stakeholders.

Evidence collected showed that some Member States are planning to change the arrangements for the implementation of the second round of the structured survey in 2022 compared to the first round in 2017. Most of the MAs are at the planning stage with the structured survey and were not able to assess the consistency of methodology of structured surveys in 2017 and 2022 in terms of interview method (face-to-face or phone interview), FEAD target groups to be covered by the survey and, additional questions included to the unified questionnaire template. However, the data collected by the study team shed light on the envisaged arrangements for the structured survey and additional data collection:

- In France, the structured survey of 2022 is beingcarried out by the external contractor selected via public tender and a considerable number of questions of the template have been simpified to ease the understanding of volunteers and end recipients .

- In Estonia, the structured survey of 2022 is envisaged to be implemented by the research agency Kantar Emor which 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 which allows for the cross-check whether FEAD end recipients participate in ESF funded measures or other programmes for people experiencing unemployment.

- In Lithuania, the structured survey of 2022 will stick to the methodology applied in 2017 and will be followed by evaluation of relevance and added values of FEAD support conducted by the external contactor. The additional questions related 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 2021-2027 programming period which surveyed partner organisations on the relevance and potential advantages and shortcomings of e-vouchers.

Challenges related to COVID-19 pandemic can also cause changes in the approach to structured survey and the strategies for the outreach to the most vulnerable target groups. Though face-to-face interviews can be partially replaced by interviews over phone, specific target groups, 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 for sufficient privacy of respondents.

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

Analysis of the data collection arrangement set to monitor and assess the implementation of FEAD OP I type programmes led to the following key findings on the data collection methods, bodies responsible for data collections and frequency of reporting, and the implementation of structured survey:

- Member States use a **mix 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.
- The analysis showed that **counting** is mainly used to collect the data on common output indicators and FEAD end recipients (common result indicators) when MSs apply more centralised and top-down approach to FEAD implementation: i. e. identify eligible recipients based on national social assistance schemes and registers, have comprehensive IT tools for data collection, reporting and storing, rely on regional and municipal authorities as POs.
- **Informed estimates** are usually used to generate the data on FEAD end recipients when MSs apply a bottom-up approach to FEAD implementation, there are no ex-ante defined lists of recipients eligible for support, and data are collected by the staff and volunteers in the front-line organisations. 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).
- While counting allows for better accuracy in the identification of specific target groups, informed estimates can also provide for solid evidence and allow for comparisons with other data while reducing administrative burden. However, for both counting and informed estimates difficulties related to primary data collection and data aggregation and reporting were identified.
- **Use of external registers** – is considered a straightforward and easy way to generate the monitoring data and cross-check the data collected using other methods (counting or informed estimates). There were no difficulties identified while using external registers for generating monitoring data.
- Though used to a limited extent, **surveys** as a data collection method do not cause difficulties for the monitoring of FEAD OP I programme when used for the primary data collection (AT, FR). However, as an additional tool to crosscheck the data reported by POs (LV), surveys pose additional costs to FEAD implementation.
- Actual responsibilities of the actors involved in the FEAD implementation at national level also depend on **the type of assistance provided** and **the indicator** considered, however in most cases **the partner organisations** and **beneficiaries** provide most of the data on the common output and result indicators across OP I programmes. Our analysis showed that the capacity to monitor FEAD operations vary across partner organisations as well as territorial affiliated organisations. Limited human and administrative capacities of some POs and frontline organisations cause errors and lack of accuracy in data reported to the MA.
- Across all OP I type programmes, **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 rules of data collection were set in legal acts on FEAD implementation and funding requirements (e. g. calls for applications). However, availability of additional guidance can ease implementation and monitoring of FEAD support and reduce the administrative burden for POs caused by FEAD monitoring requirements.
-
- The **frequency of reporting** varies from real time monitoring and weekly reporting to annual reporting to meet the minimum requirements of FEAD regulation. In most MS the 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 seen to be sufficient by the MA. However, excessive reporting requirements (e.g. monthly or weekly reporting),

especially if the reporting is not supported by well-developed electronic information systems, pose an additional burden on POs.

- FEAD data collection arrangements allow for sufficient privacy and protection of sensitive data. If collected, these data is stored in the national registers or internal systems of POs with restricted access. Beneficiaries, Intermediate bodies and the MAs in most cases use anonymized numeric data reported to them by POs and do not have access to primary data on FEAD end recipients.
- Following the provisions of the Commission Implementing Regulation (EU) 2016/594 and Guidance note on FEAD structured survey, the structured surveys were conducted in all MSs implementing OP I type programmes. However, differences in survey methods applied across the OP I type programmes and challenges experienced by the volunteers and external contractors, affect the comparability of data (during the programming period for the same MS and between different MSs at EU level) and should be taken into account in the future ex-post evaluation of FEAD programmes.

2.2. Strengths and weaknesses of OP I data collection and monitoring systems

The analysis of the strengths and weaknesses of the monitoring systems across FEAD OP I type programmes was set around the following main criteria of:

- the **advantages and the shortcomings of the arrangements for data collection** and processing;
- the **quality of data**, reporting errors and **quality control mechanisms** in place.

2.2.1. Advantages and shortcomings of the arrangements for data collection

Analysis of data collected for this study shows that the main factors which affect the process of data collection and the quality of monitoring data itself are related to the (**IT) systems and tools developed** to facilitate data collection and processing, and **administrative capacities of actors** in charge of data generation and processing.

Following FEAD legal framework, all MAs have developed electronic data storage systems, however, interlinkages with IT tools or systems used by PO (if any) or access to FEAD e-cohesion system granted to POs as well as the actual use of the system by POs to monitor the progress of implementation and report the data to the MA varies across Member States. In general, on a scale from 1 (weak) to 10 (very good) the MAs of FEAD OP I type programmes assessed the performance of current monitoring systems from 6 to 10. The main strengths emphasized by the MAs was simplicity and reliability of the monitoring systems including IT systems and tools used (BE, FI, FR, HU), integration with national registers (e.g. BG, EE, GR, LT, LV, PT), reporting functionalities (e.g. GR, PT, IT). Among the main limitations were pointed limited functionalities, outdated solutions, difficulties experienced by POs using digital solutions, common IT system both for FEAD-funded and national food-support schemes (see Table 4).

TABLE 4. SELF-ASSESSMENT OF FEAD MONITORING SYSTEMS AND TOOLS BY THE MANAGING AUTHORITIES

MS	SELF ASSESSMENT OF 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 information, needed for the elaboration of the AIRs and the final report of the Programme, information on project level for the needs of the certification and audit, etc. The system is connected to other systems which allows for cross-checks reducing the possibilities of technical mistakes.
CY	8	-
EE	7	The system is working, but lot 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 done in the way of extracting and summarizing data.
HU	7	The system is simple but it fulfils its purpose.
IT	6	The MA undertook a satisfying digitalization campaign to collect real-time data from POs, which is still ongoing. Some POs are very small and are not digitalized 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 installation of electronic signature which could give more opportunities and linkages to other systems. MA emphasized that 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 for additional registers to use.
LV	7	The IT system has been established during 2007-13 and being constantly improved and updated. The basis of the platform is now out-dated and does not always allow for integrating new IT solutions. Nevertheless, the IT system has been operational and liable 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 partner organisations 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 organizations complain of some complexity in filling it out.
RO	10	The system provides the necessary structure for each stage of monitoring, data / information collection."
SI	8	There is no data exchange with partner organisations.
SK	7	It offers to users basic functionalities, 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.

Integrated monitoring systems and accompanying IT tools developed and used by Member States are seen as an important improvement that contributes to the quality of monitoring arrangements and the reliability of data.

- In Greece, **a comprehensive IT system – Integrated Information System** and online platform were developed to monitor the processes of distribution of support, register the data on delivered FEAD

support, generate primary data and process the reports on the achievement of FEAD monitoring indicators. An online platform has role-based user access and allows for tracking the data on beneficiaries (updated monthly), as well as all inputs of products, by type and by quantity, and outputs (distributions' details). The platform is seen as an innovation and has been recognized by the evaluators of the programme as a good practice. Based on the data stored on the online platform, partner organizations complete the annual Indicator achievement report which is submitted in the Integrated Information System.

- In Portugal, **IS FEAD** system allows for tracking all FEAD-funded operations and access to it have all bodies and partners in charge of FEAD implementation. The development of the system aimed to ensure the eligibility of end recipients through interoperability with Social Protection Services; assist partner organisations in recording all the activities of their operations and respective stock management; obtain and report the information required by all foregoing EU regulations. IS FEAD, goes beyond what is required by the FEAD delegated regulation and therefore collects and reports indicators based on counting. Also, it is possible to obtain directly from the IS FEAD the indicators that are reported in the annual implementation reports. IS FEAD provides to partner organisations an Excel file – support tool - that can be used to help them calculate the amount of food to be delivered to each household, according to its composition. With the delivery of food is also delivered a document with the indication of the products to be received which is signed by the end recipient with confirmation of the amount of food received. This document is uploaded to the IS FEAD after the delivery. Though FEAD regulations does not oblige the end recipients to sign any document, this was an option of the Portuguese authorities, namely to help the end recipients to control the food delivery process.

- In **Italy**, the first level data about end recipients are collected in real-time by POs through the SIFEAD platform. POs that do not have SIFEAD, collect data on their own IT system which has interfaces with SIFEAD and transmit data. When an end recipient benefits from FEAD for longer than 6 months is considered a frequent user, therefore the PO opens a file and collects real data including the household composition, first name, surname and other information. The MA collects fiscal codes to make sure end recipients are existing human beings. For non-frequent users (such as homeless) it is up to each PO to find a contact approach, no file is opened about them. The MA verifies data by contacting POs.

- **In France**, the e-cohesion digital platform (SIAA) is used to report the data collected by PO. The SIAA is the information system reporting all national food aid data, and the 4 POs use it. However, each PO has its own IT system from which data can be entered directly into the centralised system in an Excel format. Each POs submits annual impelementation reports, including all data coming from the platform SIAA, which later are used to prepare the AIR at programme level to be submitted to the Commission. Data is collected in Excel file and transmitted to the Commission SFC.

- In **Belgium**, two main POs are in charge of collecting data directly from end recipients and submission of data to the MA through a Google Form. Some POs (e.g. "SVP Giraud") **in Belgium** also use electronic monitoring systems which enable them to report real-time data. However, multiple POs report the data through on-cloud solutions. These POs collect data from informed estimates based on administrative records, often using paper forms. They share data in a web form to the MA that downloads data in an excel form and submit it to the EC with the annual reports.

- In **Poland**, access to the system developed by the MA is granted to Intermediary Body that collects data from the lower level partners using its own application. The data necessary for reporting on progress of implementation of FEAD programme in AIRs is obtained by the Managing Authority 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 partner organizations operating at national level (currently there are four organisations). In turn, partner organisations at national level receive data from partner organisations operating at regional level. Each regional organisation has under its supervision from a few to several dozens of local organisations that distribute food under the program to end recipients. Local organisations collect the most basic information about the amount and type of assistance provided after approving the initial application for support by the eligible persons, aggregate the data, often in paper form, and fill in other needed information before submitting it to the respective regional organisation. The lack of a tailored IT monitoring system accessible to all partner organisations was reported as one of the weaknesses of the FEAD monitoring in 2014-2020 programming period.

- In **Lithuania**, POs have access to a dedicated FEAD system (EPLSAFIS), but do not use it for reporting; the data on end recipients are submitted to the beneficiary (European Social Fund Agency) by e-mail in the format of MS Excel spreadsheets. Given the moderate number of POs in Lithuania (62 POs) and close cooperation between POs and beneficiary in charge of data processing and quality checks, this data processing method is seen by the MA as acceptable and efficient way to report on the progress and results of FEAD programme.

Our analysis showed that **access to IT systems and tools** (direct or through interface connection) granted **to partner organisations and beneficiaries** reduces the need for manual interventions (administrative burden), and the risk of data errors, data loss and breach of data confidentiality.

Also, integration or linkages of **FEAD monitoring IT systems to the national social benefits registers and IT systems** benefit the data collection and verification process and contribute to the quality of monitoring data. Linkages to the national social support registers in those MSs where the eligibility of FEAD support is identified based on these registers (e.g. Greece, Hungary, Latvia, Lithuania, Malta, Poland, Slovenia), simplify and facilitate collection of data on FEAD end recipients and data quality checks implemented by the MAs or IBs. 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 withdraw from the manual counting of end recipients and reduce the administrative burden for partner organisations and beneficiaries. Since 2021, there is an option for a plausibility check on whether a single end recipient has received the food support or not which is conducted when inputing the end recipient`s personal number in the IT system.

In several Member States, IT systems developed for FEAD monitoring were based on the information systems established for implementation of other EU funds. In that respect, the case of Bulgaria (OP I), where the electronic system deployed is shared with other national Operational Programmes, requires less financial and human resources for its use. Such an approach is also followed in Latvia (OP I) where the system of ERDF Operational Programmes is to be used as a basis for a FEAD reporting system. However, the experience of using a single IT tool in Spain (OP I) for both FEAD and ESF turned out not to work properly. During the interview it was noted that "the technical requirements for the IT exchange system [of FEAD] were contaminated by the ESF requirements and ended up by complicating what was originally conceived to be simple". The implementation of the Spanish system was not consulted with the partner organisations and beneficiaries and there was no capacity building provided to them regarding the IT tool set-up and use.

Thus, evidence collected showed that the usefulness of the particular IT systems and other data collection tools depends on the national context of implementation of FEAD programmes. It is agreed that arrangements for data collection and processing should not cause excessive administrative costs for the MAs and administrative burden for POs given the type of support provided, limited resources available for FEAD programmes,

vulnerable target groups addressed and the involvement of multiple non-governmental partner organisations that rely on the work of volunteers. Despite systems and tools developed, analysis by the study team showed, **that administrative costs for the MA and administrative burden on POs due to the lack of simple and efficient solutions** for data collection, excessive national rules in place and limited capacities of POs were seen as the main weaknesses of data collection systems for OP I. This weakness is less relevant for those MS that apply bottom-up approach to FEAD OP implementation (e.g., FI, BE, FR) and developed close cooperation between MA and POs.

Streamlined implementation of FEAD programme in Finland

The implementation of **Finnish FEAD programme** is streamlined, and the administrative burden on partner organisations aimed to be reduced as the food aid distribution is done by partner organisations' local volunteers. During the period 2018-2020, there were 22 partner organisations, which had a total of 480 local distribution centres. The Finnish FEAD programme only includes the distribution of food and accompanying measures.

In Finland, there is no eligibility criteria, identification, nor registration of the beneficiaries at the local level under FEAD OP I. The Finnish Food Authority is responsible for purchasing and transporting the food aid to the partner organisations. The partner organisations 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 through the partner organisations annually. Also, common results indicators based on an informed estimates by the local distribution centres, are reported to the partner organisations annually.

Worth to notice is that implementation and monitoring arrangements of Finish FEAD OPs are based on the mutual trust and close cooperation between MA and partner organisations aimed at meeting the minimum legal requirements set in FEAD regulations without excessive administrative burden to POs and other organisations involved. Also, the MA has provided tools and methods for estimating the number and type of beneficiaries at the local level. The standardised tools and methods make the estimates more robust as they follow the same logic and method.

Large number of partner organizations in some countries implies **different degree of understanding and capacities** to meet the requirements for the reporting documentation, even if there are clear provisions and standard reporting forms. Also, small partner organisations (e.g., in Italy, Poland) and those relying on the work of volunteers (e.g. Finland, Belgium, Italy, France) face challenges related to the lack of human resources, and competences to follow the data collection and reporting procedures set at national level.

P**roper instructions and guidance** for partner organisations contribute to the improved quality and reliability of data and were identified as one of strengths of FEAD monitoring systems at nationa level and an important condition for smooth and trackable collection of data under FEAD OP I programmes. There were two types of activities implemented by the MAs of the OP I type to guide and instruct actors involved in FEAD implementations and monitoring:

Basic guidelines on monitoring indicators

- in Belgium, the Managing Authority provides concrete examples on how to report indicators according to the FEAD legal framework and a special guidance for the structured survey as well as email address for partner organisations to contact in case of difficulties.
- in Greece, the guide provides precise information on how to extract the information from the electronic databases, how to calculate the indicator values and how to compile the indicator achievement form;

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

Meetings and training

- training to partner organisations and annual meetings in Finland; also, if a local distribution centre has issues with reporting, they can contact either the Managing Authority directly or its coordinating partner organisation;
- seminars for partner organisations and individual consultations upon request in Latvia;
- periodical meetings and trainings for POs in Lithuania;
- training for the partner organisations on the usage of electronic platform and periodical meetings with main partner organisations in Italy on the use of IT system SIFEAD.

Analysis of current strengths and weaknesses of current FEAD monitoring arrangements for OP I type programmes showed that further strengthening of the administrative capacities of POs and development of simple and easy to use IT solutions as well as provision of user guidance to POs and front-line organisation are required to ensure smooth and timely collection of data on FEAD monitoring indicators.

2.2.2. Quality of data aggregation and reporting

Processes of data aggregation and reporting at national level, though highly dependent on the quality of data collection arrangements discussed in the previous sub-chapter, constitute a subsequent step and is an area in which an assessment of strength and weaknesses is carried out by the study team. Although the data collected for this study do not allow us to specify actual shortcomings of data quality inherent to particular data collection method selected, based on the desk research and interviews with the MAs, the main weaknesses relating to the quality of FEAD monitoring data materialized in inaccurate data reported and delayed reporting to the Managing Authorities by POs.

Analysis of data collected during the interviews with the MAs shows that despite guidance provided to POs, specific errors were reoccurring in the data reported by POs and beneficiaries to the MAs. The common reporting errors detected by the MAs include:

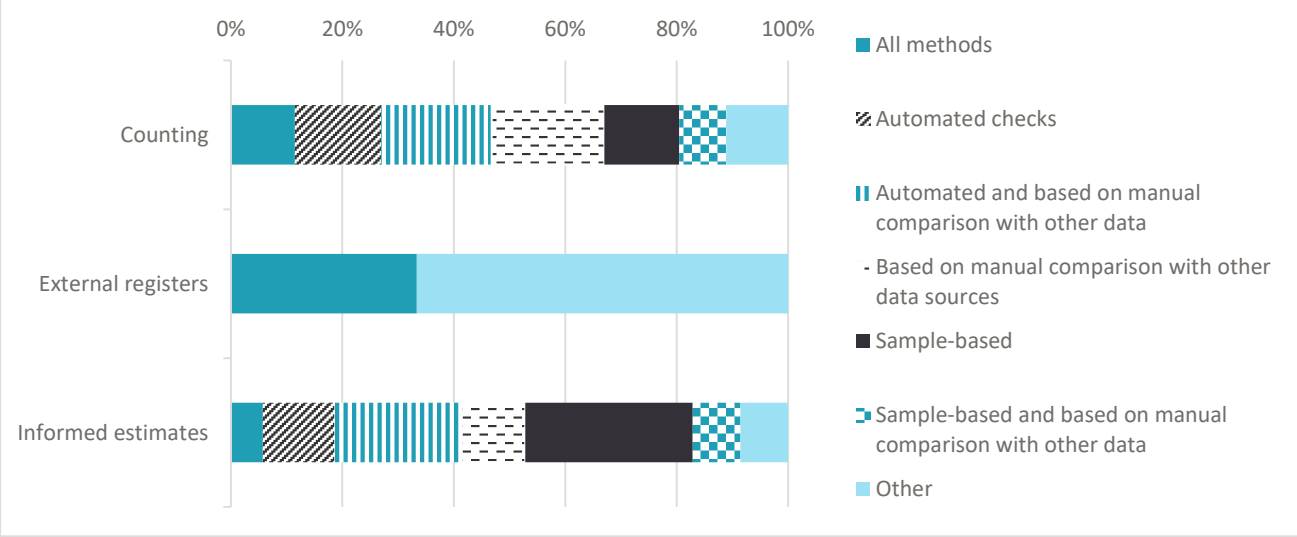
- use of wrong measurement units
- reporting separate instead of cumulative values (or vice versa)
- duplication, double counting of end recipients, over-reporting
- wrong use of decimal separator
- other miscalculations and misinterpretations, especially when indicator definitions are not clear
- clerical errors.

The **main strength** of current FEAD data collection systems at national level is that they include data quality checks and control procedures which allow for timely identification of reporting errors. Only two MAs informed the study team on data wrongly reported to the EC as errors were not detected at national level:

- In Poland, in 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, which was due to an error in entering data from the PO's reports. The error has already been corrected, and the MA has established additional control over the data entry.

Analysis of the information collected by country experts of the contractor showed that the types of **data quality and plausibility checks** applied **to verify the values of the common output and result indicators** are almost evenly spread when monitoring data are collected using counting and informed estimates (see Figure 6). The most common type of data quality checks applied by the FEAD Managing Authorities were automated checks which were based on comparison or complementarity with other data. For example, the automated check set by FEAD MA in Greece requires that each single reported value for a distributed food package be complemented by the signature of the end recipient on a tablet in order 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 is systemically or on an ad-hoc basis compared against the data available in the external registers (including national social assistance registers) or financial and historical data of FEAD implementation. All methods of data quality checks (i.e. automated, sample-based and 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 are measured through external registers (see Figure 6).

FIGURE 6. THE 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.

Though quality checks based on comparison with other data sources are more common when counting is applied for data collection, data collection based on informed estimates also envisage automated checks and manual comparison with other sources. To verify the plausibility of values reported, the MAs or Intermediate bodies conduct comparisons with the data of 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 data reported include the "four-eyes principle" with two independent checks on the same dataset applied by the MA to check the values reported in 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 through **automated procedures** can be considered a good practice as data is extracted directly from computer systems, where individual data is processed automatically rather than manually. This leads to a final greater accuracy of data. Quality checks based on the **comparison with other data sources** are also reported to be an effective procedure for conducting quality checks as it makes it possible to easily correct reporting errors such as double counting. In Austria, automatic checks are conducted on the names and birthdays of end recipients when they are entered into the data collection and reporting system. This prevents the possibility of double receipt of FEAD support and double counting respectively.

The Red Cross in **Austria** is distributing **the material assistance** based on the information shared by the regional states` authorities (children of parents receiving minimum income). Per each distributed item the representatives of the Red Cross fill in a report in a database with attached documentation to it. The system does not allow sharing the information from the identity documents with the partner organisation. However, automatised plausibility checks may be carried out based on the names and the birthday of the respective end recipient. Further, the system is set with in-built audit trails and "live" exchange of data between the partner organisation and the Managing Authority. The reporting on the result indicators on the gender, minority and migrant status is conducted by externally contracted fully voluntary survey at the places of distribution which provides for strong correlation between the output and result. The result indicator value is then extrapolated. The values of the result indicators on the total number of persons receiving basic material assistance and the number of children aged 15 years or below is being counted by schools.

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

The interview with the Managing Authority in **Belgium** showed that the aggregated data collected by volunteers in the partner organisations are currently submitted to the European Commission without previously used systemic cross-checks with the data on the food delivered to the distribution centres. When the POs previously made reporting errors (such as double counting) the MA corrected them with an informed estimation based on a comparison with the volume of products distributed to each POs (distributed according to the number of administrative registrations).

The **main weakness** related to the quality of data collection and reporting processes is administrative costs for the MA and/or administrative burden to POs due to **the lack of tools to automate data collection and processing and integrate quality checks**.

In **Finland**, most of the indicators are counted by the local distribution centres and their volunteers and reported (in MS Excel sheets) through the partner organisations (provide aggregated data) annually. In this way, the collection of monitoring data does not add much administrative burden to partner organisations. However, lack of volunteers' knowledge and skills might lower the quality of monitoring data. To ensure the required quality, partner organisations perform checks on the data provided by the local distribution centres and the Managing Authority performs two-eye principle checks as well as manual follow-ups in case there are visible anomalies from previous years or a discrepancy between food aid packages delivered to the partner organisation and the amounts distributed. Also, it takes time to compile the reports as they come in from the local level to the partners and only afterwards to the Managing Authority in Finland. Although the

current system seems easy to manage as there are Excel sheets that can be aggregated and the administrative burden may be low, the time span between the actual implementation of FEAD funded activities and approval of reliability of the monitoring data to be reported in AIRs can be quite long. Frequent discussions with partner organisations contributes to the robustness and accuracy of the data and, therefore, are considered as a strength.

Results of desk research and analysis of interview data showed that data collection and processing rules set at national level are sufficient to ensure the reliability of data reported in annual implementation reports and meet the requirements set in FEAD regulation. Data quality control and plausibility checks to verify the reported values at national level proved to be effective in identifying the common reporting errors in the data submitted by POs and beneficiaries. However, the type and depth of quality checks also depends on the functionalities of IT systems and tools used for reporting including automated checks and manual comparison against other data sources. To reduce the risks of implausible data reported, the MAs set additional control procedures (automate, sample-based, "four eyes" based quality checks), arranged follow-ups and have 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 POs.

Key findings on the strengths and weaknesses of data collection systems for OP I type programmes

The assessment of the strengths and weaknesses of data collection arrangements for OP I type programmes at national level indicates that key strengths of current systems include:

- **integration or interoperability of IT systems** and tools for the monitoring of FEAD implementation developed by the MA **with IT systems and tools used by PO** for support distribution (e.g. interface based connection) or direct access to the IT systems for FEAD monitoring granted to all or main POs;
- **linkages or integration** of the FEAD monitoring systems and tools **with external (social assistance) registers** which allows to directly obtain details on FEAD end recipients, cross-check the data on FEAD end recipients reported by the POs and ensure the plausibility of data reported in annual implementation reports;
- **simple reporting rules and streamlined data collection and reporting** to meet the minimum requirement of FEAD legal framework when FEAD implementation is based on bottom-up approach and relies on close cooperation of the MA and POs, and involvement of frontline organisation;
- **systemic and ad-hoc data quality checks** in place - automated, based on comparison against other data, sample-based or a mix of these – allows to timely identification of reporting errors and contribute to the robustness of data reported to the EC.
- MA's **guidance and templates for the collection and reporting the data** on FEAD monitoring indicators ensuring the unified format of data collected in those cases when monitoring data cannot be processed using interoperable IT tools.

The main weaknesses identified by the analysis include:

- the **administrative burden for POs** that are directly involved in the distribution of support caused by the national reporting rules and lack of simple and user-friendly IT solutions for the collection and reporting the data;

- **limited administrative and human resources** capacities of POs to collect and report the data using sophisticated IT systems, lack of knowledge and skills on how to meet the monitoring requirements of FEAD support.

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. Member States implementing OP II programmes can define their own target groups based on their needs and priorities. Denmark aims to deliver social inclusion services to persons suffering from homelessness, unclear residence status, abuse, mental illness, disabilities; Germany aims to improve the social inclusion of immigrants and homeless people; the Netherlands focuses on elderly people with low incomes, and Sweden supports the integration of vulnerable EU/EEA citizens into Swedish society. Social inclusion activities provided under OP II are often highly relevant for the needs of the target groups (e.g. migrants, homeless people, or people at risk of homelessness and older people above working age and tend to provide services that are otherwise lacking (e.g. health advice or social events to contribute to integration).

The monitoring and evaluation of OP II programmes relies on several indicators – input indicators (common for both OP I and OP II), common output and result indicators, and programme-specific output and result indicators. **For OP II,** the **common[11] output indicators** include the total number of most deprived persons receiving social inclusion assistance, covering end recipients from specific groups which are considered as vulnerable to social exclusion. Unlike OP I, OP II records data on individual participants receiving assistance under OP II. **Common result indicators for OP II** aim to assess whether the situation of those receiving assistance through OP II has improved and is measured through **programme-specific indicators.**

3.1. Data collection arrangements

Data collection methods and procedures vary in each Member State implementing OP II programs. Data collection procedures differ in terms of what role actors play in the data collection process, what methods they use to collect and analyse the data, what systems are put in place to transfer data from beneficiaries or partner organisations to the Managing Authority, as well as in terms of frequency of reporting and methods used to ensure quality.

To better understand the processes of data collection for OP II in the four aforementioned EU Member States, it is essential to overview the implementation models of FEAD monitoring systems in particular. Identified approaches to FEAD implementation and monitoring will allow to assess key aspects of data collection (i.e., data collection methods, responsible bodies, frequency of reporting, ways of protecting sensitive data, ensuring data quality and conducting evaluations), emphasize strengths and weaknesses of data collection systems and draw lessons based on the implementation approach applied for OP II type programmes.

[11] 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

In the context of implementation of FEAD OP II type programmes, smaller countries stipulate simple implementation structure by introducing less projects and collaborating with less partner organisations to execute them. In both Sweden and Denmark, 3 ongoing projects are being implemented, the Netherlands implements only one, while 67 projects are currently under implementation in Germany (see Table 5).

TABLE 5. IMPLEMENTATION ARRANGEMENTS OF FEAD OP II PROGRAMMES

	DENMARK	GERMANY	THE NETHERLANDS	SWEDEN
Eligibility criteria	Being homeless vulnerable EU migrant (Church Crusade, 2016-2019) Being homeless street sleeper (Project ODENFOR, 2016-2019) Being homeless (Red Cross opened Care Center in 2020) Being homeless vulnerable migrant in Copenhagen (The Church's Crusaders, 2019-2021) Being homeless person with legal residence in Denmark (Salvation Army Headquarters Project STEP BY STEP)	Being EU immigrant (including families and children, homeless or homeless threatened people) (advisory including parent-related assistance, education offer for children)	Being elderly with a low disposable income	Being vulnerable EU/EES citizen with non-residence rights (homeless and earning for a living through begging or as street musicians)
Number of POs	Limited number of partner organisations and close distance with Managing Authority: 3 project organisations Church Crusade (in 2016 and 2019) Red Cross (in 2019) Salvation Army Headquarters (in 2019)	Separate projects funded, no partner organisations	Libraries as partner organisations (1 central PO reports the data) Cooperation partners: course providers; community teams; care homes	3 partner organisations participated in 2020, however, number of participating organisations varied over the years from 3 to 10.
Number of projects	3 ongoing projects 5 projects since 2016: 2 projects in the period of 1 July 2016-30 June 2019 and 3 projects in the period of 1 July 2019-31 December 2021.	67 projects	1 project	3 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 the desk research and interviews with the Managing Authorities

Low number of projects and partner organisations allows for simple and smooth collection of monitoring data in Denmark, Sweden and the Netherlands thus avoiding and excessive administrative burden on POs. It is also expected to receive more reliable records from only few partner organisations which usually are in a quite close contact with MA. In Germany, there are 67 separate projects led by many different organisations. Therefore,

aiming for the same simple and fluid data collection, the process is organised differently. Implementation of programme that involves many different actors (project managers) needs a well-functioning data gathering tool and coordination of high quality. This could be seen as a challenge for the country's MA to ensure the reliability and robustness of data, however, it could also be seen as an opportunity to provide a well-operating and professional system which reduces administrative burden for all the parts involved and provide high quality data.

When it comes to eligibility criteria, the common feature to be mentioned among all OP II type programmes' countries was the choice of specific target groups to be supported by FEAD OP II funded measures. National context was taken into consideration to identify the most vulnerable group(s) within the country however, the bottom-up approach to implementation put emphasis on the necessity for the POs to adapt the content of the activities depending on where in the country they operate.

The main groups of OP II type programmes include people with migrant origins, the homeless and elderly persons. For three ongoing FEAD projects in Sweden vulnerable EU/EES citizens with non-residence rights who often come from countries where they cannot support themselves and their families are eligible. A large proportion of target group are Roma from Romania and Bulgaria who have difficulty in obtaining their rights in the form of schooling for children, healthcare and financial assistance in their home country.[12]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 the low-income elderly persons. Also, efforts being made to include more participants of migrant origin or people with disabilities). Libraries were chosen as partner organisations and the project offers various activities including strengthening of digital skills, social gatherings, home delivery of books, reading together via video bubbles, online meetings.

Homeless people are covered under the FEAD OP II in Denmark and Germany, with the stronger focus on them in Denmark. In Germany the priority is given to the people of migrant origin, however, in some cases this requirement overlaps with the homelessness. In Denmark these two preconditions of being person with migrant origins and homeless often go hand in hand and the assistance offered provides healthcare, emergency accommodation, support for target group's physical and mental health and aims to improve their social situation or give advice on existing opportunities.

All in all, implementation models for FEAD OP II in four EU member states – Denmark, Germany, the Netherlands and Sweden – could fall into two clusters of different data collection structure. Smaller countries (including Denmark, the Netherlands and Sweden) have simple implementation arrangements which involve limited number of partner organisations and projects while large countries use more complex frameworks consisted of more projects and partner organisations involved in the provision of FEAD funded support (Germany). The following sub-chapters will provide more details and insights on the specific aspects of data collection methods, bodies in charge, frequency of reporting and other data collection aspects of OP II type programmes based on their implementation arrangements used for the implementation of FEAD OP II.

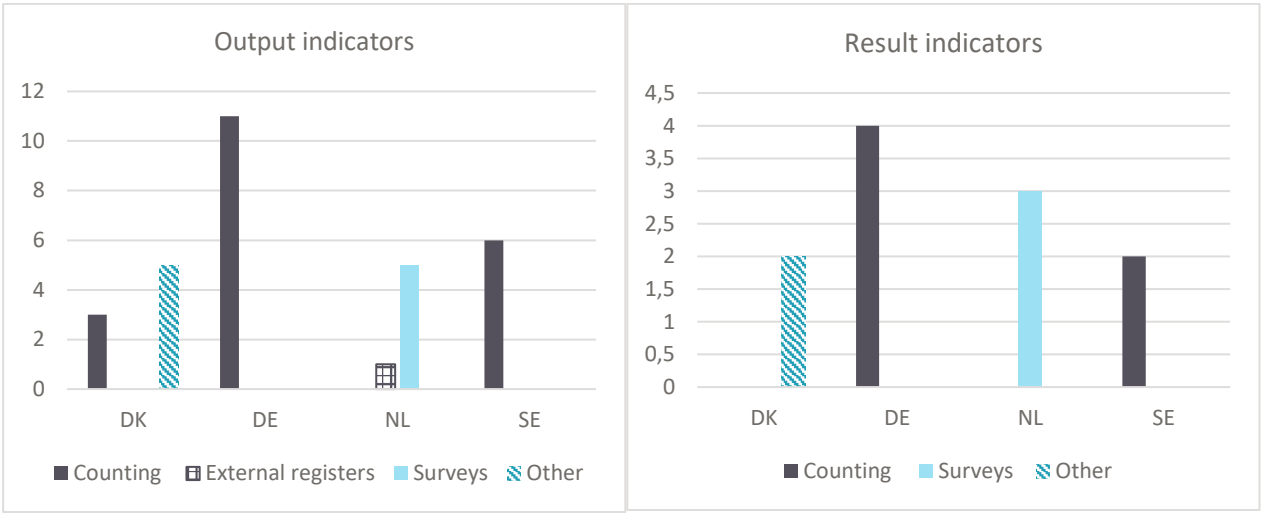
3.1.1. Data collection methods

Analysis of data collected showed 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 collecting methods**, such as self-reporting from projects. Data collection methods may differ for

[12] Socialstyrelsen. 2014.

output and result indicators. For example, the Netherlands combine external registers and surveys to collect data on output indicators and use surveys of end recipients for result indicators. Denmark combines counting, informed estimations and self-reporting by partner organisations for output indicators and uses informed estimates and self-reporting through surveys of end recipients to estimate results (see Figure 7).

FIGURE 7. 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 method is the main practice for the collection of output indicators (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 to gather data. Data collection and reporting by many beneficiaries (libraries) across the country explain the need for the use of external registers to generate accurate data.

Counting is the only one method used in Germany for generation of FEAD monitoring data, however, it requires a lot of administrative resources to collect reliable data from different public and non-governmental organisations (67 ongoing projects) which implement FEAD OP II projects. Although administrative burden is reduced by the developed IT system, data collection remains quite complex and sophisticated.
Surveys and self-reporting through survey of end recipients are used in the Netherlands and Denmark (including **informed estimate**) where they complement the data collected by using external registers and counting.

To generate the data on FEAD result indicators, counting is used in two countries – Germany and Sweden. In Germany, due to the size of the country and accordingly more difficult FEAD OP II implementation arrangements beneficiaries face the challenge of excessive administrative burden. and should consider possibility to introduce clearer and more standardized simpler data collection system.

In Denmark and the Netherlands, surveys and self-reporting through surveys are used to collect the data at the level of result indicators These data collection methods aims to collect the data on the current situation of those receiving social assistance, give more details on thei improvements over the time and provide contextual information and the assessment of service content. For instance, in the Netherlands, three result indicators have been formulated in the OP to specify the objectives and measure how the quality of social life has changed for elderly people over the time: 1 year after participation, the participant is still visible to aid organizations and/or municipalities (target value 65 per cent, result – 80 per cent); after participating, the participant indicates that

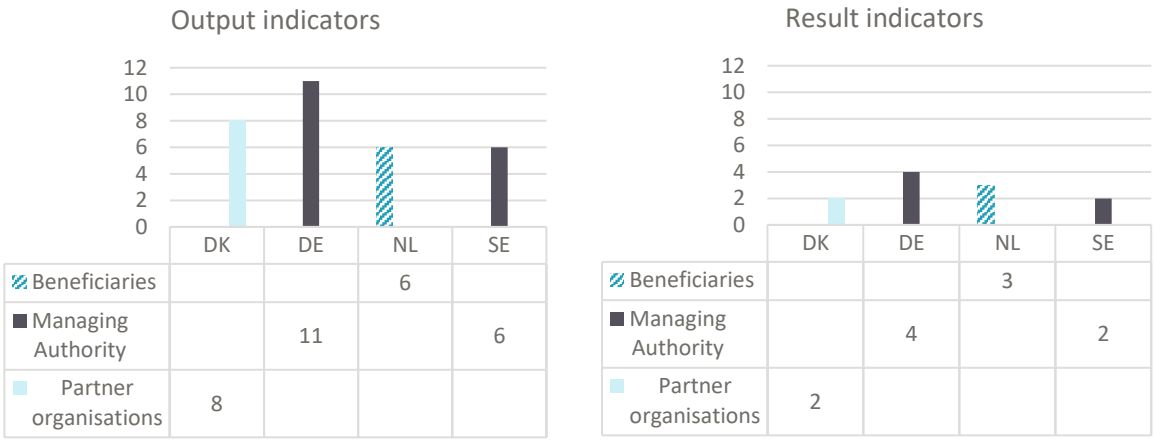
he or she has a strengthened social network (target value 40%, result - 49 per cent); after participation, the participant indicates that he or she has strengthened competences (target value 60 per cent, result – 68 per cent). In the Netherlands, the questionnaire used for surveys is unified to ensure the full coverage of all indicators and uniformity of data collected.

3.1.2. Bodies responsible for data collection on FEAD support under OP II

MAs, beneficiaries or partner organisations may be responsible for data collection process, as the FEAD regulatory framework foresees the involvement of partner organisations in the reporting on the key indicators. In Germany and Sweden, managing authorities are responsible for collecting data on output and result indicators, however in Germany the primary data are generated by beneficiaries that implement multiple projects In Denmark, data collection responsibility falls on partner organisations, however, possibility for the MA to be involved more in the data collection process is appraised due to the small number of partner organisations and aspiration to provide more thorough and reliable data. In the Netherlands, the partner organisation is responsible for collecting relevant data on output and result indicators taking into consideration the large number of libraries involved in the provision of social assistance (see

Figure 8). In addition, the actual responsibilities and degree of involvement of the partner organisations and other beneficiaries at national level depend on the indicator in question.

FIGURE 8. BODIES RESPONSIBLE FOR DATA COLLECTION ON OUTPUT AND RESULT INDICATORS



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

3.1.3. Frequency of reporting

For consistent and reliable data, it is important to ensure regular reporting based on established standardised data collection and recording procedures, and provide guidelines and training to POs, if required. The Managing Authorities of each OP II type programme identified the frequency of reporting as sufficient, although it varies significantly by country, based on the intricacies of data collection systems. To ensure standardized reporting that covers all required indicators and provides for the necessary data, the Member States have used various IT software (Germany, the Netherlands, Denmark), as well as standardised reporting

forms. The MAs of OP II type programmes have also provided guidelines on key indicators and data collection methods.

In **Denmark**, partner organisations report data to MA **every six months**. On the 30 June and 31 December, the POs (currently, three of them) send the data on the number of participants as well as their sociodemographic information on their age, gender, migrant, disabilities, and alcohol/drug abuse. This data is manually registered in **TAS (Tilbudsadministrativesystem) by MA**. TAS is an administrative system used in the Danish public sector, where each project has its own journal number. To separate administrative and financial data, another system, Navision Stat, is used to keep track of reimbursements. Administrative burden is quite high for POs in Denmark considering the manual process of data registration by MA. According to the MA, manual procedure of entering data into TAS system has been chosen because there are so few projects (only three POs and a small distance between the MA and the project organisations) in the Danish context that an automated system would not be feasible.

In **Germany,** project managers, and counsellors report data in **real time** by entering it into **IT system ZUWES.** The system is also used to transmit the data to the Managing Authority. Participation forms and questionnaires are available to substantiate reported data. This method of using IT system to gather data from 67 different project managers across the country contributes to the reduced administrative burden. However, as it was mentioned in the previous sub-chapter, data collection should be simplified to ensure its reliability.

In the **Netherlands**, data is **reported by the administration of the beneficiary (**most of the data supported by documentary evidence) at least once a year to the MA as there is only one project in social inclusion assistance. **MA collects, audits and calculates relevant data.** The data is collected by separate libraries using two software programmes (data provided in real time): **Pladder and Surveymonkey.** Pladder is used at the start of participation (after the beneficiary interviews the participants), and Surveymonkey - during or at the end of participation (also, data from the interviews with end-recipients). Central beneficiary makes an excel file to backup of the data in Pladder and puts it on the digital exchange platform on a regular basis. Such data is shared with MA every year. Thus, MA and the central beneficiary use a digital data exchange/transfer area, where both the beneficiary and the MA can place all the relevant documents. Both have rights to add, read and download the data. MA relies on the data provided by the libraries using external registers.

Sweden, on the other hand, 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. The data is reported **monthly** through **written reports, submitted to the MA via email**. Such frequency of data reporting could allow for easier identification of errors and the corrections made in advance. The FEAD website in Sweden provides standardised reporting forms available for download. The reporting organisations can download the forms and report on the key indicators. MA in Sweden is responsible for the final version of the data reported in annual impelemtation reports to the ES.

3.1.4. Protection of sensitive data

Member States 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 type of data collected,

- Germany, the Netherlands, and Sweden do not collect **personal data** while Denmark checks personal IDs to establish whether the person is legally resident in Denmark.
- All countries collect **information on the origin, age, gender, housing situation and disability or belonging to a minority group as FEAD social assistance targets particular groups of people**. In the Netherlands, if information on age is not available, individuals are not eligible for the programme.

- Provided the sensitivity of certain topics, most difficulties arise when collecting data on disability and abuse.
- Not all countries collect data on **household composition**, which may impact the needs for specific social integration services such as kindergarten enrollment.
- Germany and Denmark collect data on additional indicators: Germany additionally collects data on homeless people (which is not required but important for the inclusiveness of the assistance), and Denmark also collects additional data on the use of other provisions for homeless, to ensure that most appropriate services are delivered.

All Member States implementing OP II programmes have undertaken measures to ensure adequate protection of such collected data. In **Germany,** the data transfer to MA is encrypted, access to the data is based on predefined rights for relevant actors, data is logged and regularly backed up. While MA claims that the systems are protected from physical dangers, cyber-attacks, and non-authorised access, there is little information how it is done.

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

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

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

3.1.5. Evaluation surveys

For the Operational Programmes providing support activities contributing to the social inclusion of the most deprived person ("OP II"), the Core Team has established that 3 out of a total of 4 Operational Programmes have performed structured surveys on end recipients as part of their programme evaluations. Even though the Operational Programme in Sweden has not conducted a structured survey (the Operational Programme has not disclosed such a document), it should be noted that the programme provided a permanent survey template to the FEAD support recipients to estimate their satisfaction level in addition to the counting of the result indicator.

In **Denmark**, the programme evaluation was based on qualitative and quantitative research methods, i.e., observations and interviews. 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 observations from 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 is not a set quantitative goal and when persons from different cultures are interviewed.

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

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

Analysis of the data collection arrangement set to monitor and assess the implementation of FEAD OP II type programmes led to the following key findings on the data collection methods, bodies responsible for data collections and frequency of reporting, and the implementation of structured survey:

- MAs use a **mix of data collection methods** including counting, informed estimates, external registers and surveys to collect and report the data on FEAD OP II type common output and result 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 collecting methods, such as self-reporting from projects.
- **Data collection methods differ for output and result indicators.** The Netherlands combine external registers and surveys to collect data on output indicators and use surveys of end recipients for result indicators. Denmark combines counting, informed estimates and self-reporting by partner organisations for output indicators and uses informed estimates and self-reporting through surveys of end recipients to estimate result indicators.
- Low number of projects and partner organisations allows for simple and smooth collection of monitoring data in Denmark, Sweden and the Netherlands thus avoiding and excessive administrative burden on POs. It is also expected to receive more reliable records from only few partner organisations which usually work in close contact with MA.
- Actual responsibilities of the actors involved in the FEAD implementation at national level depend mainly on **the indicator** considered, however in most cases **the partner organisations** and **beneficiaries** collect primary data on the common output and result indicators across OP II programmes. In Germany and Sweden, managing authorities are responsible for collecting data on output and result indicators, however the primary data are generated by beneficiaries and partner organisations delivering the FEAD support for social inclusion activities for selected target groups In Denmark, data collection responsibility falls on partner organisations, however, possibility for the MA to be involved more in the data collection process is appraised due to the small number of partner organisations and aspiration to provide more thorough and reliable data. In the Netherlands, the partner organisation is responsible for collecting relevant data on output and result indicators taking into consideration the large scale of libraries involved in the provision of social assistance.
- The Managing Authorities of each OP II type programmes identified the frequency of reporting as sufficient. To ensure standardized reporting that covers all required indicators and provides for the necessary information, the Member States have used various IT software (Germany, the Netherlands, Denmark), as well as standardised reporting forms (Sweden).
- FEAD data collection arrangements allow for sufficient privacy and protection of sensitive data. If collected, these data are stored in the national registers or internal systems of POs with restricted access. Beneficiaries, Intermediate bodies and the MAs in most cases use anonymized numeric data reported to them by POs and do not have access to primary data on FEAD end recipients.

- Following the provisions of the Commission Implementing Regulation (EU) 2016/594 and Guidance note on FEAD structured survey, the structured surveys were conducted in all MSs implementing OP I type programmes. However, differences in survey methods applied across the OP I type programmes and challenges experienced by the volunteers and external contractors, affect the comparability of data and should be addressed while planning and implementing the ex-post evaluation of FEAD programmes.
- All Member States implementing OP II programmes have undertaken measures to ensure adequate protection of such collected data, using encrypted data transfer and access based on predefined rights (Germany, the Netherlands), regular data back and log of changes made up (the Netherlands, Denmark), anonymisation of data reported to the MA (Sweden).
- For OP II type programmes in Denmark, Germany, the Netherlands structured surveys of end recipients have been performed as part programme evaluations. Whereas in Sweden a permanent survey template to the FEAD end recipients is distributed to estimate their satisfaction level in addition to the data on the result indicator collected by counting.

3.2. Strengths and weaknesses of OP II data collection and monitoring systems

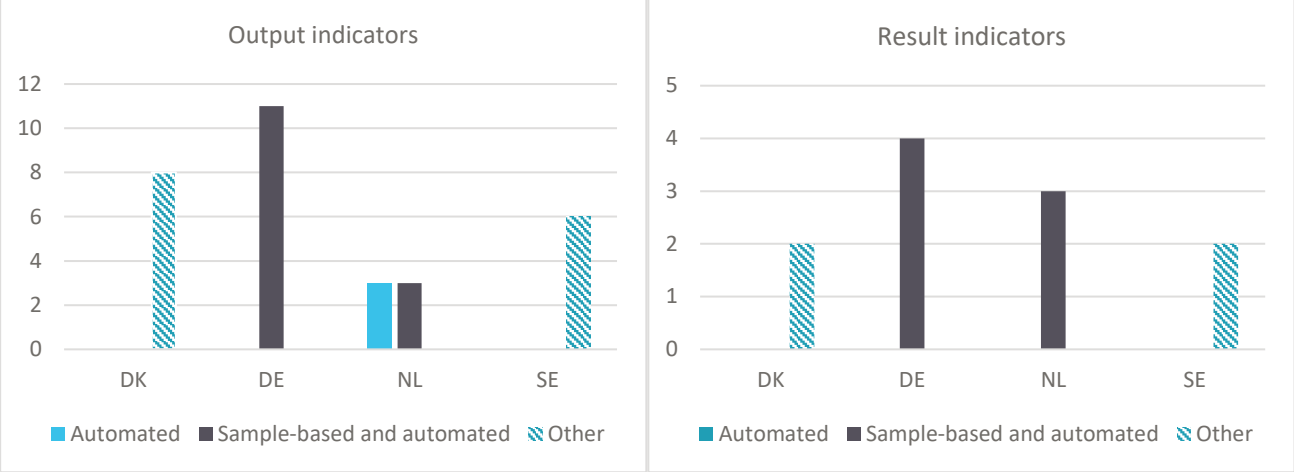
Our analysis showed that overall, the MAs in the Member States implementing OP II programmes view the existing data collection and monitoring system positively, with their ratings ranging from 7 to 10 (with 1 being weak and 10 being very good).

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
- administrative mistakes due to human error.

To address the risks of error, various data quality checks have been adopted for OP II type programmes (see Figure 9).

FIGURE 9. METHODS FOR QUALITY CHECKS



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

In Germany, MA uses **automatic plausibility checks** integrated in its IT system, which are applied for both output and result indicators. Large number of project and aspiration to avoid excessive administrative burden explains the choice of sample-based and automated method for quality checks. MA performs plausibility checks based on the reported numbers in the annual project reports. In case likely misreporting or implausible data are identified, **MA does not perform any manual interventions** into the reporting system but asks for verification and correction of the potentially misreported data by the beneficiary. All the corrections in the IT system come from the project managers themselves and have to be always based on the participants forms, which are then kept available for further administrative and audit verifications. In general, data provided rely on the project managers. MA being responsible for the data acts as 'verificator' (due to the high administrative burden no other methods to check the data are involved).

In Denmark, particular difficulties arose when collecting data on people with disabilities, as the definition of who qualifies as a person with disability has been highly ambiguous and contested. **Denmark** uses sample-based quality checks for programme-specific output indicators in order to avoid misinterpretations as much as possible, and a wide range of other quality control methods for common result indicators. These methods include sample control of appendices, visits to projects, revision review of procedures to ensure accurate audit trail, as well as manual follow-ups. Manual follow-ups including a thorough examination of the documentation of projects **are used to confirm that there is no double funding**. MA checks manually that projects receiving support from the FEAD programme do not overlap with specific projects receiving funding from the European Social Fund. The manual follow-ups are also used in accounting procedures to ensure that expenditure claimed is valid. MA acts as a 'controller' and is responsible for carrying out these quality control procedures. Furthermore, there is an external evaluator of FEAD in Denmark, VIVE who has already carried out mid-term evaluation of the programmes, including an assessment of these quality checks. Narrow structure of FEAD implementation model in Denmark (three partner organisations and a close cooperation between MA and POs) allows to use different methods for quality checks. The responsibility given to POs to collect all the data empowers MA to focus on data quality checks.

In **the Netherlands,** the partner organisation, beneficiaries and MA are responsible for ensuring the quality of data. Automated plausibility checks for result and output indicators, and sample-based automated checks for output indicators are used. Automated methods allow to easier control and check the data and ensure data reliability in the context of many different actors (libraries) collecting the data. Beneficiaries provide instructions to their staff on what to fill in Pladder and Surveymonkey with survey data. The project leaders checks the data from these two applications; and financial and administration staff check the financial data. The MA performs

controls on the financial data and on some of the data in Pladder. 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, as well as computing indicator values. **Manual interventions are applied by MA at the analysis stage to process the data.** For example, MA uses Excel to filter out the data on ineligible participants or combine other relevant data. Such manual interventions are necessary to calculate some of the indicators. All manual interventions are also verified by a second person. These manual procedures of data quality control are effective only at the analysis stage when all the data are centrally gathered.

In **Sweden**, MA uses manual plausibility checks to assess data quality, but **no other manual interventions** are carried out. Sweden adopts alternative quality control methods, such as yearly on-site visits. 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 partner organisations at the moment. Monitoring Committee is an audit institution in Sweden which follows Swedish ESF Council's work with FEAD and is in charge of ensuring quality and efficiency. The committee consists of representatives from authorities, non-profit organizations and universities and is appointed by the government. During follow-up visits and checks on the spot, the Swedish ESF Council agrees that the administrative routines follow the rules according to the article Article 32 of Regulation (EU).

Nonetheless, all systems feature both strengths and weaknesses, which are discussed further for each country.

In **Germany**, the key strength of reporting system is that data on output and result indicators are collected and reported by the partner organisations to the Managing Authority through a comprehensive IT system. The IT system has in-built automatic plausibility checks, which are then complemented by data checks conducted by the Managing Authority. Such a system allows to collect 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 the end recipients. This is done through surveys, self-reporting, phone calls to recipients by partner organisations, or by counting 'referral' tickets. While the strength of this method is that it allows to focus specifically on the results, the limitation of this data collection model is the lack of uniformity in collected data. Further weaknesses of the system relate to the ambiguity of indicator definitions, and misinterpretation of them by partner organisations. Also, the need to comply with the GDPR requirements raises additional administrative, human resource, and time costs of monitoring the programme for partner organisations.

In **Denmark**, only the information on the number of persons aged 65 years or above and that of women is collected by counting, based on observations and estimations from the representatives of the partner organisations. The rest of the indicators used by the Operational Programme is manually input by the partner organisations in individual files of the end recipients. The need to manually enter most of the data to be able to report on relevant indicators is the key weakness of the system. This is only feasible because there are few FEAD projects and there is close contact and ongoing communication between the projects and MA, which 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 arising issues in close-to-real time and can be seen as one of the strengths of the system. Additional challenges arise with the interpretation of the definition of indicators on people with disabilities and abuse. For example, there is a disagreement whether a medical diagnosis should be used as a proof of disability status. Lack of uniformity, ambiguous definition, and incorrect interpretation of indicators may lead to under estimation or double counting of certain individuals, thus leading to inaccurate data reporting. In the case of result indicators, Denmark uses sample-based surveys conducted by an external contractor. However, such surveys may not always serve as a reliable source of data, since in many cases the end-recipients are hard to track once the programme ends (risk of participant attrition).

In **the Netherlands,** the data collection relies on beneficiary surveys both for output and result indicators. Participants are surveyed at the beginning and at the end of the provision of service. The partner organisations fill in the form and upload it to a data exchange platform. The questionnaire used for surveys is unified to ensure the full coverage of all indicators and uniformity of data collected. The strength of the system is that it is relatively straightforward and clear and allows for collecting uniform data. However, because the data is manually entered into the system by partner organisation staff, there is a risk of human error at the input level. Also, instructions are provided for staff entering the data into the system to further reduce the risks of mistakes. An additional limitation of using surveys of end participants to measure the results is the risk of participant non-response, whereby it may be close to impossible to find and interview all those who received assistance through OP II once the programme has ended. This may contribute to skewed reporting on result indicators due to both underreporting of the number of the overall responses as well as due to possible over-representation of the positive or the negative responses across the survey sample. To address the issue, the MA could conduct surveys at different points throughout programme implementation, not just at the end.

In **Sweden,** standardized forms are used to collect data on output and result indicators. Partner organisations collect the names of beneficiaries after providing consultations on social assistance programmes. The end recipients may provide feedback on the quality of consultations, services, and assistance received by selecting glowering or smiling faces on an evaluation form. The result indicator is calculated based on the number of smiling or glowering faces. However, the 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 glowering/ smiling faces may be interpreted differently by those providing feedback, and thus not reflect their actual experience. Finally, the forms do not allow collecting information on the reasons behind such negative or positive evaluations. Partner organisations submit the data monthly to the Managing Authority via email. Monthly submission of aggregated data allows for timely and regular monitoring and taking corrective actions earlier.

Key findings on the strengths and weaknesses of data collection systems for OP II type programmes

Data gathered and analysis conducted by the study team identified the following main strengths of data collection systems supporting the monitoring of FEAD OP II type programmes:

- simple and streamlined data collection and reporting on programme's progress and achievement when FEAD implementation arrangements results in a small number of projects and close cooperation of bodies in charge of data collection and reporting;
- sufficient IT system with in-built data quality checks when multiple organisations collect and report the data in real time;
- clear responsibilities of different actors involved in the data collection and reporting, limited manual follow-ups on monitoring data, availability to log all the changes made to data reported by partners and beneficiaries;
- guidance and templates provided for the data collection and reporting.

The main weaknesses identified by the analysis include:

- lack of uniformity in collected data when multiple methods (surveys, self-reporting, phone calls, etc.) are applied to assess the number of end recipients who actually used the services referred to by FEAD funded project in Germany;
- the ambiguity of indicator definitions, and misinterpretation of them by partner organisations (Germany, Denmark);

- the need to comply with the GDPR requirements raises additional administrative, human resource, and time costs of monitoring the programme for partner organisations;
- the risk of participant non-response and skewed data on monitoring indicators (the Netherlands).

4. Identified good practice examples

With regards to the **identification of good practices**, we followed a two-step approach. Based on good practice identified in each Member State, we prepared a database of potential good practice examples. The database allows us to categorise the **good practices across key elements of data collection systems**, such as data collection arrangements, tools and (IT) systems for data collection, data quality control procedures, protection of data, etc. In a second step, we qualitatively assessed the collected good practices and identify transferability conditions. The results of this assessment will be verified during the **workshop with stakeholders involved in FEAD monitoring at national level** that will be arranged under Task 3 of the study and presented in the final report of the study.

Identification and qualitative assessment of good practice were built on the self-assessments of the MAs collected during interviews and focus groups, and independent expertise of the members of our study team. The following criteria were considered for the identification of good practice examples:

- high reliability and robustness of data on monitoring indicators;
- maintained light and flexible administrative system of FEAD programme;
- reduced administrative burden and costs of data collection;
- no excessive requirements and gold-plating[13] is imposed;
- dignity and non-stigmatisation of FEAD end recipients are considered.

The list of the identified good practice examples and detailed descriptions are presented in Table 6 below. The assessment will be further developed and updated based on the feedback received from MAs and the discussion with the stakeholders.

TABLE 6. GOOD PRACTICE EXAMPLES AND THEIR TRANSFERABILITY FOR FEAD OP I AND OP II

GOOD PRACTICE EXAMPLES	TRANSFERABILITY CONDITIONS
FEAD OP I	
Comprehensive monitoring and data collection system that ensures high transparency level and audit trail for the complete process of FEAD OP implementation and monitoring (BG, GR, PT).	- Integrated IT system with interlinks to national registers and access granted to all parties involved in data collection and reporting; - Sufficient amount and continuity of support (FEAD and non-FEAD funded) distributed to justify resources needed for the development of monitoring and data collection system; - Training, guidance and technical support to partner organisations and local partners involved in the distribution of support.
User-friendly electronic platforms and other e-cohesion solutions that allow real-time	- Sufficient amount and continuity of support (FEAD and non-FEAD funded) distributed to justify resources needed for the development of electronic system and tools;

[13] "Gold-plating" is referring to the excessive rules set by national, regional and local authorities in respect to implementing EU law.

monitoring and reporting for all parties involved and ensure consistent and quality data.	- Accessible to MA, IB, beneficiaries and all POs at any level of support distribution; - Interoperability with tools and systems used by the main POs and national registers; - Training, guidance and technical support to partner organisations and local partners.
Generation and reporting of monitoring data based on counting exclusively (BG, LT, MT) without any estimates.	- Application of clear and documented condition of eligibility for FEAD support; - Ex-ante generated lists of eligible end recipients (based on national social benefits registers or other national support schemes); - Main sociodemographic characteristics should be available to obtain from national registers on all FEAD end recipients; - Centralised monitoring systems which allow to collect and aggregate data on FEAD output indicators. - Distribution of prepared meals is not funded by FEAD OP.
Methodology and guidance on how the indicator data should be collected, aggregated and reported to the partner organisations for easing their reporting process.	- Training and technical support to POs and other partners on the application of methodological manuals and guidance.
Consistent and unified methodology to calculate values of FEAD funded meals based on informed estimations. E.g., 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.) that can produce a plate of a hot meal. All other products are considered to be supplementary and are not taken into account. Based on the National Nutrition Guides, the MA sets out how many grams of each kind of product produce a plate of a hot meal. Once the report of the amount of food that is delivered to soup kitchens is taken from the system, the MA converts the total delivered amount of the selected products to meals.	- Good practice example relevant to specific type of assistance – distribution of FEAD funded meals; - Information (IT) system is required that allows for monitoring of the amount of food products distributed to POs and soup kitchens. - More general good practice to ensure consistency of data reported both based on calculation and estimates;

Delegation of data collection, aggregation and reporting functions to POs and local partners which are directly involved in the distribution of support. Application of **informed estimates** as the main way to generate monitoring data.	- Consistent and unified methodology to estimate values of FEAD monitoring indicators; - Strengthening capacities of POs and other partners and continuous provision of technical support on data collection and processing; - Regular and thorough data quality checks implemented by IP or MA to verify the robustness of data.
Use of data from national registers to retrieve the sociodemographic data on FEAD end recipients.	- Eligibility for FEAD funded schemes is based on national social support mechanisms and criteria; - Role-based user access to national registers is granted to actors involved in FEAD monitoring following 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 used only for reporting on anonymised values.
FEAD OP II	
Straightforward OP II data collection system in the Netherlands	- Limited number of projects with the focus on particular target group; - Standardised questionnaires to gather unified and comparable data;
Monthly data reporting (monthly) allowing for the timely identification of mistakes and reporting errors	- Simple and standardised templates for reporting only essential data or reporting on selected indicators only; - Close cooperation between the MAs and limited number of POs and beneficiaries;
Standardised forms for the interviews, surveys in Sweden and the Netherlands.	- Standardisation of various forms for data collection makes easier the data collection and reporting and lower the administrative burden to POs. - Standardised forms are likely to provide less errors and more reliable data, however they should be clear and simple not to pose additional administrative burden on POs
Comprehensive IT system for data collection and reporting in Germany.	- 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; - Sufficient guidance and training provided to POs on how to collect and report the data in a unified manner.

Source: compiled by the authors.

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Conclusions and recommendations

The analysis conducted showed 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, rules for data generation, aggregation and processing and quality checks may cause misinterpretation of data by external users of data published at national level, and European level, and reported in annual implementation reports. Based on the results of the analysis of the data collection and reporting arrangements for the monitoring of FEAD OP I and II type programmes, we further present the key findings of the study and provide draft recommendations for 2021-2027 programming period.

Data collection and reporting arrangements

Flexibility of FEAD legal framework in the 2014-2020 programming period resulted in a variety of data collection systems developed by the MS implementing OP I and II type programmes. All methods envisaged in FEAD legal acts and guidelines were used by MS to collect the data on FEAD monitoring indicators. **Counting** was the most common method of data collection across the OP I and OP II type programmes, but usually MSs apply approaches based on **a mix of data collection methods**. The selection of data collection method to be applied for the monitoring of FEAD programmes reflects the national context of FEAD support provision, including general arrangements for programme implementation – top-down or bottom-up approach to programme implementation, number of projects and partners involved in implementation and monitoring of FEAD, IT systems and tools developed or adjusted to collect and report the data on implementation of FEAD programmes:

- To generate the data on FEAD end recipients, **informed estimates** are used in MS which apply the bottom-up approach to FEAD implementation, there are no ex-ante defined lists of end recipients eligible for support, and data are collected by the staff and volunteers in the front-line organisations. Also estimates are used when details on sociodemographic characteristics of FEAD end recipients or particular sensitive target groups are not available.

- **Counting** is mainly used to collect the data on common output indicators and FEAD end recipients (common result indicators) when MSs apply more centralised and top-down approach to FEAD implementation: i. e. identify eligible recipients based on national social assistance schemes and registers, have comprehensive IT tools for data collection, reporting and storing, rely on regional and municipal authorities as POs. External registers are considered a straightforward and easy way to generate the monitoring data and cross-check the data collected using other methods (counting or informed estimates). There were no difficulties identified while using external registers for generating monitoring data.

While counting allows for better accuracy in the identification of specific target groups, informed estimates can also provide for solid evidence and allow for comparisons with other data while reducing administrative burden. However, for both counting and informed estimates difficulties related to primary data collection and data aggregation and reporting were identified. **Estimates** are particularly difficult for partner organisations when reporting on FEAD end recipients which can be identified as belonging to sensitive target groups such as migrants, participants with a foreign background, minorities, persons with disabilities and homeless. Whereas reporting based on counting pose an excessive administrative burden to POs, especially when this data collection method is not supported by interoperable or interlinked IT system or reporting rules go beyond the minimum requirements of FEAD legal framework.

Protection of personal data

All Member States implementing OP I and II type programmes have undertaken measures to ensure adequate protection of collected private data. An overview of FEAD data collection arrangements showed that these data (if collected for the purpose of monitoring and reporting) are usually stored or accessible only at the lowest level of FEAD implementation. Beneficiaries, Intermediate bodies and the MAs in most cases do not have access to primary data on FEAD end recipients - anonymized numeric data are reported to them by POs. For OP I type in most MS personal data on FEAD end recipient is gathered from the national social assistance registers, whereas in Belgium, Italy, Finland and France sociodemographic characteristics are estimated by the staff and volunteers of frontline organisations., however in France, data on sensitive target groups are neither collected nor estimated. For OPII type, Germany, the Netherlands, and Sweden do not collect **personal identification information**, while Denmark checks personal IDs to establish whether the 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 belonging to a minority group are considered sensitive data, which usually is available if only self-reported by the end recipient.

Structured surveys and evaluation

Following the provisions of the Commission Implementing Regulation (EU) 2016/594 and Guidance note on FEAD structured survey, the structured surveys were conducted in all MSs implementing OP I type programmes. However, differences in survey methods applied across the OP I type programmes and challenges experienced by the volunteers and external contractors, affect the comparability of data and should be considered while planning and implementing the ex-post evaluation of FEAD programmes. As shown by the desk research, the completeness and comprehensiveness of structured survey reports submitted to the EC as well as coverage of sensitive target groups by the data collected varies across the MSs (e.g., frequency of response provided either for all respondents or by the age group).

To conduct the structured survey, most MSs contracted external providers (e.g., private survey companies). However, in Malta, the survey was implemented by the National Statistics Office, and in Belgium the structured survey was conducted by the POs, and no trained interviewers were involved. Also, in France the survey was mostly conducted by volunteers of the POs consulted by the polling companies and institutes. Though implementation of structured survey by POs can increase the response rate and reach out to the most vulnerable groups (e.g., the homeless), it also poses the risk of misinterpretation of questions, biased answers and unproportioned burden for POs staff and volunteers.

Across OP II type programmes, surveys as part of evaluations were conducted in Denmark, Germany and the Netherlands. All three surveys were conducted by external contractors, which minimize the risk of bias in the cases where the interviews are conducted by the representatives of the partner organisations. Further, that usually ensures interviews are professionally conducted .

Quality of data collection, errors and data quality checks

Results of desk research and analysis of interview data showed that data collection and processing rules set at national level are sufficient to ensure the reliability of data reported in annual implementation reports and meet the requirements set in FEAD regulation. Data quality control and plausibility checks to verify the reported values at national level proved to be effective and further improving in identifying the common reporting errors in the data submitted by POs and beneficiaries.

However, the quality and reliability of data reported by partner organisations and beneficiaries under **FEAD OP I type** strongly depend on the **administrative and human capacity** of actors involved in primary data collection, and **experience** both in delivering assistance to FEAD end recipients and meeting the requirements related to distribution and monitoring FEAD-funded support. In general, the MAs of FEAD OP I type

programmes assessed the performance of current monitoring systems from 6 to 10 (on a scale from 1 being weak to 10 being very good). The main strengths emphasized by the MAs was streamlined implementation and monitoring of FEAD support and simple solutions for data collection (FI, BE), the reliability of the monitoring systems, including IT systems (BG, GR, PT, LT, IT), integration with national registers (BG, GR, EE, LT, LV, etc.), handy reporting functionalities. On the other side, among the main limitations pointed out were the narrow functionalities and lack of interoperability of IT systems, outdated solutions (LV, LT), difficulties experienced by POs using digital solutions (IT, PT, PL, ES), common IT system both for FEAD-funded and national food-support schemes or ESF support (GR, ES).

Integrated monitoring systems and IT tools developed and used by Member States were important improvements that contributed to the quality of monitoring arrangements and the reliability of data. Integrated or interlinked systems have the potential to increase the **accuracy of the monitoring data** and **reduce the administrative burden for PO**.

Another main strength of current data collection systems is that they include data quality control checks and **procedures which allow for timely identification of reporting errors**. Automated quality checks and quality checks based on the manual **comparison with other data sources** proved to be an effective procedure for conducting quality checks as it makes it possible to easily correct reporting errors such as double counting. However, for the reporting of the data to the EC through SCF, manual checks are usually implemented in the form of second reader or so called "four eyes" principle.

As a main weakness of data collection systems for OP I **administrative burden and lack of simple and efficient solutions** for data collection **when POs do not use IT systems or cannot access the system and tools developed by the MA** were identified. Though challenges and difficulties identified by our analysis, do not allow us to specify actual shortcomings of data quality inherent to particular data collection method selected, the main weakness of data quality are errors in data reported to the Managing Authorities and timeliness of reporting. D**ifferent degree of understanding and capacities** to meet the requirements for the reporting documentation at the level of partner organisation leads to an increase of verification efforts and reporting time.

For **OP II type programmes,** the MAs view the existing data collection and monitoring system positively, with their ratings ranging from 7 to 10 (on a scale from 1 being weak to 10 being very good). However, the information collected and analysed by the study team revealed **several sources of potential errors in data**. The most common reporting errors included misinterpretation of programme specific indicators, miscalculation of participants when applying counting methodology to collect data, and duplications of entries or administrative mistakes due to human error.

Good practice examples identified

Based on a number of criteria including high reliability and robustness of data on monitoring indicators; maintained light and flexible administrative system of FEAD programme with no excessive requirements and gold-plating imposed; reduced administrative burden and costs of data collection; and considered dignity and non-stigmatisation we identified good practice examples and the main conditions for their transferability. The list of identified good practice include:

OP I type programmes

- Comprehensive monitoring and data collection system that ensures high transparency level and audit trail for the complete 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 consistent and quality data (BE, IT, BG).

- Generation and reporting of monitoring data based on counting exclusively (BG, LT, MT) without any estimates.

- Methodology and guidance on how the indicator data should be collected, aggregated and reported to the partner organisations for easing their reporting process.

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- Consistent and unified methodology to calculate values of FEAD funded meals based on informed estimations.

- Delegation of data collection, aggregation and reporting functions to POs and local partners which are directly involved in the distribution of support. Application of informed estimates as the main way to generate monitoring data.

- Use of data from national registers to retrieve the sociodemographic data on FEAD end recipients.

<u>OP II type programmes:</u>

- Straightforward OP II data collection system (NL);

- Monthly data reporting allowing for the timely identification of mistakes and reporting errors;

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- Standardised forms for the interviews and surveys (SE, NL);

- Comprehensive IT system for data collection and reporting (DE).

Outlook to the 2021-2027 programming period

In the 2021-2027 programming period, with the integration of FEAD into ESF+, the minimum monitoring requirements for the activities aimed at food support, material assistance and social inclusion activities previously funded by FEAD have been simplified and streamlined, with a lower 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, as well as registers or equivalent sources. In the new programming period 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 were envisaged: those 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 in relevant cases. Moreover, **at least one programme specific result indicator** has to be established to provide an overview of the results achieved.

As regards 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 to the 2012-2020 programming period. For the output indicators, the distinction between the quantity of meals and food packages distributed and the obligation to report which

types of goods have been purchased, have been eliminated. However, **a breakdown of financing towards broad target groups (e.g., children, homeless people) was introduced**. For the results indicators some adjustments to the breakdowns are foreseen, e.g., now counting end recipients up to 18 years of age and an additional indicator on youths (aged 18-29 years). **Reference values should be established for some result indicators**. Programme specific indicators may also be used.

Hence, while the general objectives of FEAD (i.e., food provision and basic material assistance, as well as social inclusion for the most deprived people) have been maintained, Member States have a greater discretion to define the specific rules (e.g. target group, type of intervention). As a result, the variety of activities and indicators might be challenging to aggregate and compare.

Also, in 2021-2027 programming period, use of vouchers was envisioned as a form of delivery of FEAD funded food support and material assistance. The use of vouchers has several implications on the data collection and monitoring systems as well as actors involved in the monitoring of ESF+ assistance to the most deprived. First, use of vouchers provides reliable evidence for reporting purposes allowing for accuracy in reconciling their distributed and used numbers. Second, the end recipients can provide the vouchers in distribution centres or shops to buy food and items for personal use without the need to disclose any personal data to the partner organisation or the Managing Authority. Dependent on the implementation arrangement for vouchers-based support system, switch to this form of delivery of support can contribute to the reduced administrative burden for POs. However, the implementation of system of e-vouchers would require involvement of shops and supermarkets (or provider/administrator) of electronic cards in the data collection and reporting on common output indicators.

The draft recommendations for the 2014-2027 programming period (to be validated)

Based on the analysis of FEAD data collection and monitoring systems at national level, identified strength and weaknesses of the current systems in place and presented best practice examples, we provide the draft recommendations to the attention of Member States:

- When eligibility of end recipients for FEAD support is decided based on national social assistance/minimum income schemes, ensure the linkages and interoperability of IT systems used for FEAD data collection with national social assistance register to retrieve the details required to report on the number of end recipients and sociodemographic characteristics.

- To streamline the reporting on monitoring indicators, ensure the direct access or interface connection to FEAD IT system developed by the MA for POs, provide sufficient user guidance and training for efficient use of developed IT solutions; consult POs on ad hoc issues related to the use of IT tools.

- Consider simple cloud-based solutions (e.g., Google Forms) when the bottom-up approach is applied to the implementation of FEAD funded activities or the POs lack administrative capacities to use sophisticated IT tools; ensure protection of sensitive and confidential data and the back-up of stored data.

- To ensure the consistency of estimated values (e.g. the number of hot meals prepared using FEAD purchased food), develop the unified methodology for estimation to be applied by POs or MAs to calculate and report the values of common indicator.

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- Provide unified templates for the collection and reporting the monitoring data both under OP I and OP II type programmes to ensure the quality and comparability of data collected by different POs.

- Automate the quality checks of data reported by IT system's in-built checks to avoid wrong use of measurement and decimals, and where available automate the comparison against other data sources through interlinkages to financial data of programme and to national social assistance registers.

- Consider the reformulation of the questions provided in the template of structures survey to make them easy to understand and adjusted to the specific context of support provided at national/regional level; envisage the robust methodology for aggregation and analysis of responses to ensure the comparability of data at EU level.

- To keep the light administrative system for the monitoring of FEAD support, avoid the 'gold-plating' by introducing national rules that go beyond the minimum requirement of FEAD legal framework, e.g., signature-proved receipt of support, submission of primary data on end recipients, collection of data based on counting exclusively.

Annex 1. Information collection form (MS Excel)

Annex 2. Data collection guidelines for country experts (PDF)

Annex 3. Minutes of the Focus Group 1 (PDF)

Annex 3. Minutes of the Focus Group 2 (PDF)