



LIFT Community Grants Programme - Records Management Policy

1. Policy Statement - for Community Grants Data Management Policy

1.1 In addition to its current records management policy, concerning the Community Grants programme Norfolk County Council will create, maintain and manage accurate, reliable and useable records in line with the ESF 'Guidance on document retention, including electronic data exchange, for 2014-20 ESF projects'

2. Document Retention Period

2.1 All Lead Provider Community Grants documentation will be retained until 2030, kept in an acceptable format so that the documents can be inspected when necessary by the European Commission and European Court of Auditors.

2.2 Norfolk County Council will comply with and assist the Managing Authority to comply with document retention requirements under any applicable State Aid rules.

Where Projects are operating under a State Aid scheme in accordance with the General Block Exemption Regulation (Commission Regulation (EU) No 651/2014) or De Minimis Regulation (Commission Regulation (EU) No 1407/2013), Norfolk County Council will maintain detailed records with the information and supporting documentation necessary to establish that all the conditions laid down in the Regulation are fulfilled.

Norfolk County Council will keep these records for a minimum of 10 years after the last aid is granted under the scheme.

3. Destruction of Documents

3.1 Prior to the destruction of any documents, Norfolk County Council will seek confirmation from the Managing Authority.

4. Documentation to be Retained

4.1 The core documentation that will be retained by Norfolk County Council includes:

- All documentation relating to the ESF, including work carried out during the development, pre-application, application and during and after the project
- The Funding Agreement including any revised versions supported by appropriate correspondence from DoFE of the approval of changes to the Funding Agreement
- Correspondence from/to the Managing Authority
- Monthly or quarterly claim forms

- Working papers showing how claims were calculated, including any flat rate methodologies
- The audit trail for all of the procurement undertaken for the Community Grants project
- The State Aid approved scheme used where relevant

5. Records to be Retained

5.1 Norfolk County Council will keep records of:

- Evidence of all of the project expenditure. Including invoices and bank statements or equivalent to show the payments were made
- Where indirect overheads costs and salaries have been apportioned to the project, records must show the agreed methodology for calculating these costs
- Records of eligible participants and any supporting evidence to confirm their eligibility to receive ESF support
- Evidence of open and fair procurement of goods and services. Including proof of advertising and contract notices, quotations or tenders received, and the scoring methodology used for selecting the successful candidate. This will include details of all preparatory work prior to the procurement process and the delivery/use of the procured service and goods
- Evidence of auditable, accountable match funding, including copies of match funding acceptance letters and bank statements showing receipt of match funding
- Compliance with ESF publicity requirements. Copies of all of the publicity materials, including press releases and marketing materials will be retained to demonstrate the correct use of the EU logo and required text.
- Businesses supported for state aid purposes, including signed declarations where an organisation is operating under any state aid rules, such as de minimis, or any other state aid ruling
- Compliance with the environmental sustainability and equal opportunities requirements
- Documentary evidence which substantiates the outputs and results declared in ESF claims and on completion of projects
- The identity and location of all bodies holding the supporting ESF project documentation, and NCC will make this available on request to the Managing and Audit Authorities

6. Electronic data exchange

6.1 Exchanges of data and transactions will bear an electronic signature that is compatible with the EU Directive 1999/93/EC on a community framework for electronic signatures.

7. Acceptable Forms of Documentation

7.1 Norfolk County Council will have an electronic storage system in place which will at all times subject their electronic document evidence to an adequate system of control over their completeness and validity.

7.2 Norfolk County Council will hold documents as originals, or as certified true copies of the originals, or on commonly accepted data carriers. Commonly accepted data carriers include electronic versions of original documents on optical data carriers and documents existing in electronic version only.

7.3 Norfolk County Council will ensure that information kept on commonly accepted data carriers is kept secure and can be relied upon for audit purposes. The underlying computer system on which the electronic versions are held will meet accepted security standards which ensure that the documents held meet with national legal requirements and can be relied upon for audit purposes.

7.4 The equipment/software for all electronic documents will be retained to ensure it is functional for a two-year period from 31st December following the submission of the annual accounts in which the final expenditure of the completed project is included.

7.5 The Council will ensure that each electronic version is certified as conforming to the original document.

8. Security

Document Storage

8.1 Physical Documents - Paper copies of documentation including signed decision meeting attendance and minutes, signed funding agreements and hardcopy attachments, marketing materials, event attendance lists *etc* will be kept in ring binders in a locked LIFT designated cupboard No. 31 on Floor 6 County Hall.

8.2 Electronic Documents - All electronic versions of programme documentation and applicant documentation will be kept in secure folders, on secure drives with access restricted to the Economic Programmes Team. All electronic folders will be stored on the secure Norfolk County Council server which is regularly backed up.

Data Exchange

8.4 Exchanges of data and transactions will bear an electronic signature that is compatible with the EU Directive 1999/93/EC on a community framework for electronic signatures

Policy Review

This policy will be reviewed, and revised if necessary, at least once every eight months from the signing of the Community Grant Contract, or more often as necessary according to requirements.

Named Individual in charge of policy review and revision: LIFT Project Manager

Version No.	Published Date	Review Interval	Review Date Due	Actual Review Date	Reviewer Name	Approver Name	New Version No.	Comments
1	1/4/19	8 months	15th December 2019					

Further Information

For further information please contact: lift@norfolk.gov.uk