



## Start me up

Reporting procedures and legal framework

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**Interreg Europe training days** Lille, France













## Meet the finance and audit team



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## What will you get from today?



Understand financial reporting and control procedures work



Practice with case studies



Ask your questions



Exchange with financial managers and controllers of other projects

## Content of this presentation



- 1. Legal framework
- 2. Eligibility period and eligibility principles
- 3. Reporting process
  - General principles
  - Verification of expenditure
  - Lead partner's responsibilities
- 4. Audit and anti-fraud policy
- 5. Monitoring project budget

## Main terminology & abbreviations

- JS = joint secretariat
- MA = Managing Authority
- MC = Monitoring Committee
- LP = lead partner
- PP = project partner
- APA = Associated policy authority
- PR = progress report
- Portal = programme's monitoring system

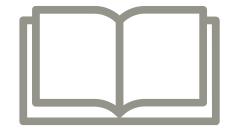
https://www.interregeurope.eu/glossary-terms



## Legal framework

## Recommended reading

- Subsidy contract
- Programme manual (latest version)
- Regulation (EU) No 1059/2021 (Interreg regulation)
- Regulation (EU) No 1060/2021 (Common provision regulation)
- Regulation (EU) No 1058/2021 (ERDF regulation)
- EU Directive on public procurement



# Eligibility period and eligibility principles

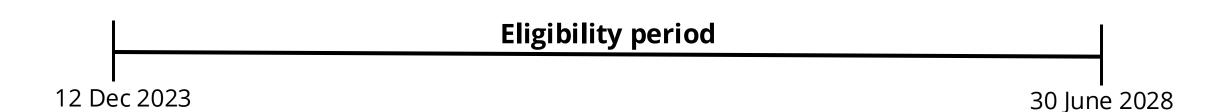
## Eligibility period

#### Eligibility period from project approval

- by the monitoring committee (12 Dec 2023)
- to the project end date (30 June 2028)



Submission date of last report = project end date = end date of eligibility of costs



## Reporting periods and deadlines

Progress report	Reporting period	Deadline for submission
First (= PR1)	<b>12/12/2023 (*)</b> – 30/09/2024	<b>02/01/2025</b> (= 3 months after the end of the reporting period)
PR2	01/10/2024 -31/03/2025 (six months)	01/07/2025
PR3	01/04/2025 – 30/09/2025 (six months)	02/01/2026
PR4	01/10/2025 – 31/03/2026 (six months) <i>Midterm review</i>	01/07/2026
PR5	01/04/2026 – 30/09/2026 (six months)	02/01/2027
PR6	01/10/2026 – 31/03/2027 (six months)	01/07/2027
PR7	01/04/2027 - 30/09/2027 (six months)	02/01/2028
Last (= PR8)	01/10/2027 – <b>30/06/2028 (**)</b> (nine months)	30/06/2028 (= end of the project = end date of eligibility)

#### Reminder

Only partners that have signed the **partnership agreement** can report costs!



# 3

## Reporting process

General principles

## General principles

#### Different levels of rules

- European: EU Regulations
- Programme
- National
- Partner/ institutional

## General principles

#### **CONSISTENT**

the expenditure allocated to the right cost category



#### **JUSTIFIED**

unforeseen expenditure items or over/ underspending needs to be justified



#### **COHERENT**

reported activities and finances have to match



## General principles

Eligibility of costs is determined by the **relevance of the activities**!

#### Costs necessary to:

- Carry out the project activities
- Achieve the project objectives



#### Points of attention

Prior **approval from JS** necessary for items not already specified and approved in the application form

#### For example:

- Activities/ travel outside the programme area
- Equipment
- Infrastructure and works





## Questions -

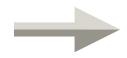


## Reporting process

Verification of expenditure

## Regulatory requirements for control system

The organisation of control systems



Partner State responsibility

**Centralised control** 

**Decentralised control** 

Legal basis:

Art. 74 of Regulation (EU) No 2021/1060

Art. 46 of Regulation (EU) 2021/1059

## The different control systems

#### **Centralised control**

Albania, Belgium (Brussels + Wallonia), Bosnia & Herzegovina, Bulgaria, Czech Republic, Croatia, Estonia, Finland, Greece, Hungary, Ireland, Latvia, Luxemburg, Montenegro, North Macedonia, Poland, Romania, Serbia, Slovenia, Slovakia, Sweden, Ukraine

Directly **appointed by Control body** 

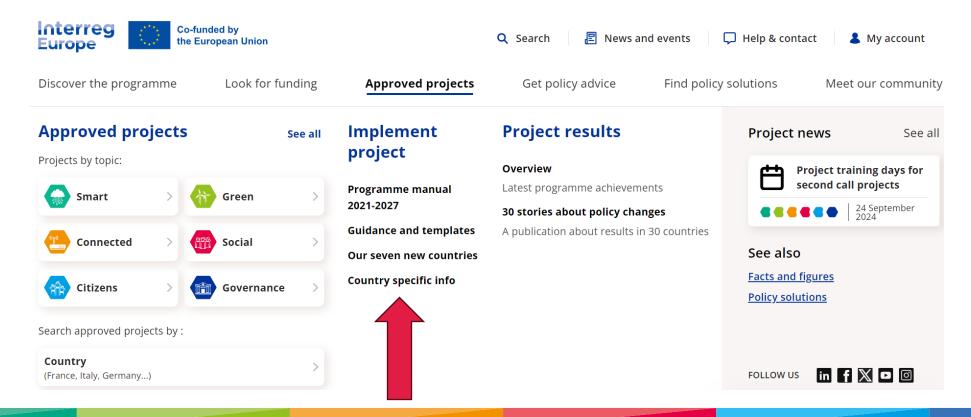
#### **Decentralised control**

Austria, Belgium (Flanders), Cyprus, Denmark, France, Germany, Italy, Lithuania, Malta, Moldova, Netherlands, Norway, Portugal (+ validation), Spain (+ validation)

Controller needs to be contracted by the PP and approved by Approbation body (sometimes there is shortlist)

#### Controller's access to Portal

Access granted by the national **Control/Approbation body**Information about the national control systems on the website



#### What do controllers check?

- Partnership agreement signed (in 1st PR)
- The list of expenditure is complete (descriptions are clear and self explanatory, in English, 1 cost per line, etc.)
- Contracts and procedures
- Proof of delivery and payment of services and products
- Invoices and all supporting documents comply with programme's, national and EU rules
- All costs are in line with activities reported

#### Where do controllers check?

- List of Expenditure section in partner's financial report
- Upload all supporting documents on Portal

   → online



- Potentially 1 On-the-spot-check in the project lifetime
- No need to send paper version

#### **How** do controllers check?

The controller certifies the expenditure and fills in Portal:

Control checklist and report





Control certificate



Appendix 3 of programme manual (templates)

+ additional step for validation for Spain and Portugal



## Sample methodology

Made through Portal



- Sample:
  - 10 lines in staff costs 1 cost per line (1 month = 1 line)
  - 10 lines from other costs categories

#### **Guidance**

For the period 2021-2027, the control of expenditure reported by partners is risk-based. The programme risk-based methodology is available here.



Controller may extend the sample and check all items

### Keep in mind!

#### Make best use of the time!

#### You can already:

- Fill in your report
- Have your controller selected with access to Portal
- Monitor your partners' advancement and support them to get ready on time!





Questions •



## Reporting process

• Lead partner's responsibilities

## Lead partner principle



### Lead partner:

- formal link between the project and the managing authority/joint secretariat
- responsible for management, communication, implementation and coordination of activities

## Role of the lead partner in the reporting



### The LP checks that:

- each financial report is clear enough
  - → i.e. descriptions = concrete and self-explanatory
- the expenditure is **related to the project** and corresponds to the activities in the application form

## Including financial reports in the progress report

The LP consolidates the financial reports in the **joint progress report** 

→ The expenditure is already certified by a controller (in line with national control requirements)



Do not re-do the work of the partner's controllers!

## Lead partner's role in reporting process

After the submission of the progress report, the LP:

→ answers to the list of **clarification requests** sent by the JS

## Lead partner's role in reporting process

After the approval of the progress report, the LP:

- receives the payment of the programme funding;
- transfers the programme funding to project partners
   without delay (!) in compliance with the amounts stated in
   the progress report.

## Reporting procedure

- 1. LP compiles financial reports into a joint progress report (PR)
- 2. LP submits PR to Joint Secretariat (JS)
- 3. JS checks and sends back clarification requests
- 4. LP submits revised PR and replies to the clarifications
- 5. JS approves PR when all requests clarified
- 6. Accounting body transfers Interreg funds to LP (1 month)
- 7. LP transfers Interreg funds to partners quickly







## Questions •



## Audit policy

## Audit and anti-fraud policy

## Quality checks and 2nd level audits

**Second Level Auditors** 







**National checks** 

## What is **fraud**?

**Irregularity** 

Error/mistake



**Fraud** 

Intentional

Correction

Correction

+ Investigation

## What is fraud?

IRREGULARITY	FRAUD	
Reported same <b>invoice</b> twice	Charged invoice for goods not received/for personal gain	
Error in the calculation of <b>staff costs</b>	Staff costs claimed for 80% while only 30% actually worked on the project	
Travel costs of director reported as <b>stakeholder travel costs</b>	Travel costs of staff members systematically reported as stakeholder travel costs	
<b>Tendering process</b> did not fully comply with all the requirements	Terms of reference drafted so that only one particular company can meet the requirements	

## **Anti-fraud** strategy

Main risks identified in our programme:

- Staff costs reported do not correspond to the reality
- Public procurement (conflict of interests, contract splitting)
- Double financing

*Ref. Programme Manual sections* 

- 6.9 Anti fraud policy

- 6.5 Preventing fraud in public procurement

## Fraud risks

Fraud risks may be at the level of:

- the beneficiary staff
- the external contractors
- collusion between the two
- JS / staff (conflict of interest, corruption...)
- **conflict of interest policy** has to be in place

## How can the MA/JS be informed?

Whistleblowing email for general public/beneficiaries

lanceur.alertes@hautsdefrance.fr



 Controller reports to JS audit officer - template available on website (Appendix 4 in Programme Manual)

www.interregeurope.eu/anti-fraud-policy

## Further potential measures





- Police investigation
- National court

# 5.

# Monitoring project budget

## Project's mid-term review

#### What?

→ A meeting between the JS and the LP

#### When?

→In the first semester of 2026

#### Why?

- → Discuss the state of play of policy improvement
- →Discuss the spending rate of the project
- →Discuss whether the project is requesting a pilot action or not

## Project's mid-term review

In case of **significant underspending** faced by the project:

- → discuss whether the project will be able to spend its total budget or not
- → if not, it may lead to a budget reduction proportional to the amount of underspending

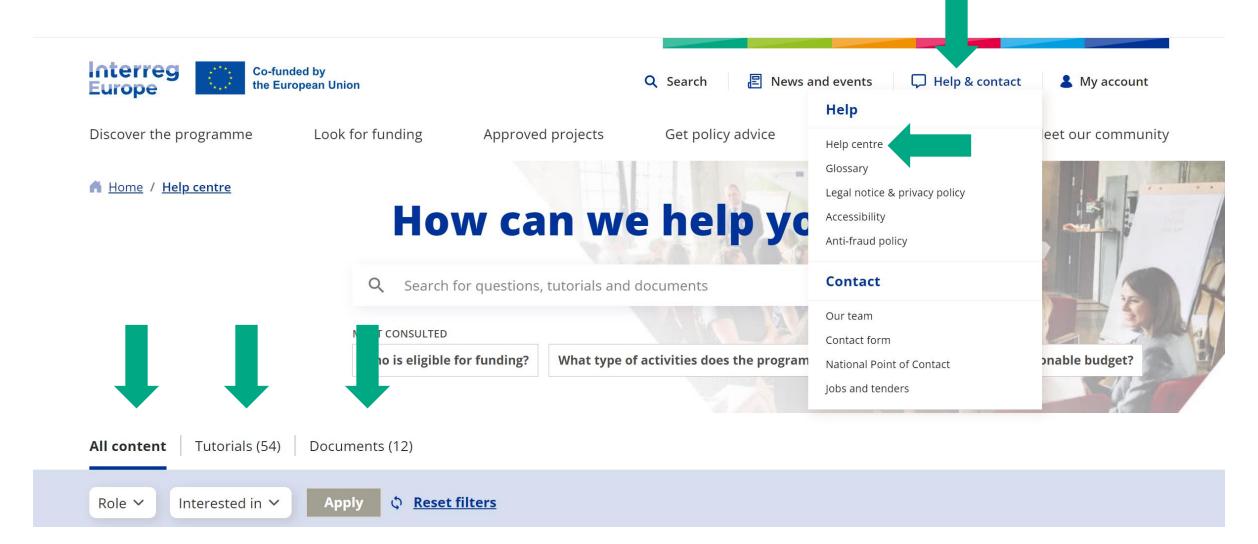
Funds returned to the programme will be used to support other activities

## Project partners not reporting costs

Partners not reporting any expenditure after 2 semesters:

- JS issues a warning to LP and informs the Partner State
- If no costs reported in third PR + not due to circumstances outside its control = project partner's budget reduced taking into account its spending plan
- If budget reduction = will be implemented after the midterm review meeting

## Where to find answers?







## Questions -





## Stay tuned: upcoming webinar on reporting

## Online Q&A session on 17 October

- →For all partners
- →To answer questions related to finances and financial reporting in the Portal
- →Specific focus for new project partners coming from the 7 EU candidate countries

## Agenda of today

10:00-11:00	Basic reporting principles, legal framework and verification of expenditure		
11:00-11:30	Coffee break		
11:30-12:45	<b>Group 1</b> Eligibility of expenditure	<b>Group 2</b> Reporting in the Portal	<b>Group 3</b> External expertise and services, equipment, infrastructure and works and public procurement
12:45-14:15	Lunch break		
14:15-15:30	<b>Group 1</b> External expertise and services, equipment, infrastructure and works and public procurement	<b>Group 2</b> Eligibility of expenditure	<b>Group 3</b> Reporting in the Portal
15:30-16:00	Coffee break		
16:00-17:15	<b>Group 1</b> Reporting in the Portal	<b>Group 2</b> External expertise and services, equipment, infrastructure and works and public procurement	<b>Group 3</b> Eligibility of expenditure
17:15	Networking cocktail		





## Thank you!

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