

ANNEX III – FINANCIAL AND CONTRACTUAL RULES

This Annex covers

- **Volunteering Projects**
- **Solidarity Projects**

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I. RULES APPLICABLE TO BUDGET CATEGORIES BASED ON UNIT CONTRIBUTIONS

I.1 Conditions for eligibility of unit contributions

Where the grant takes the form of a unit contribution, the number of units must comply with the following conditions:

- the units must be actually used or produced in the period set out in Article I.2.2 of the Special Conditions;
- the units must be necessary for implementing the Project or produced by it;
- the number of units must be identifiable and verifiable, in particular supported by records and documentation specified in this Annex.

I.2 Calculation and supporting documents for unit contributions

[for Volunteering Projects]

A: Travel

Travel costs of participants from their place of origin to the venue of the activity and return.

By default, the place of origin is understood as the place of residence of the participant and the place of the venue as the place where the host organisation is located. If a different place of origin or venue is reported, the beneficiary must provide the reason for this difference.

In case no travel took place or it was funded from other EU sources than the European Solidarity Corps Programme (e.g. a participant is already at the place of the venue in relation to another activity than the one funded from the Agreement), the beneficiary must report that situation accordingly in the European Solidarity reporting and management tool for each mobility concerned. In this case, no grant support for travel will be awarded.

- (a) Calculation of the grant amount for travel costs: the grant amount is calculated by multiplying the number of participants, including accompanying persons per distance band, by the unit contribution applicable to the distance band concerned and type of travel (standard or green), as specified in Annex IV of the Agreement. The unit contribution per distance band represents the grant amount for a return travel between

the place of departure and the place of arrival. In case of green travel modes (train, bus, shared car, boat), the green travel unit contributions apply, otherwise the standard travel unit contributions apply.

For the establishment of the distance band applicable, the beneficiary must indicate the distance of a one-way travel using the on-line distance calculator available on the Commission's website at:

http://ec.europa.eu/programmes/erasmus-plus/tools/distance_en.htm.

The beneficiary will calculate in the European Solidarity Corps reporting and management tool the grant amounts for travel based on the applicable unit contribution rates.

- (b) Triggering event: the event that conditions the entitlement to the grant is that the participant has actually undertaken the activity.
- (c) Supporting documents

Proof of attendance of the activity in the form of a declaration signed by the participant and by the /host organisation specifying: the name of the participant, the purpose of the activity, the venue, starting and end dates.

In addition, in case of use of sustainable means of transport (green travel): a declaration on honour signed by the person receiving the travel grant and the sending organisation will serve as supporting documentation. Participants should be informed of their duty to keep the proof of travel (transport tickets) and to provide it to the beneficiary, if requested.

- (d) Reporting: The beneficiary must report in the European Solidarity Corps reporting and management tool on all activities realised under the project.

B. Pocket Money

- (a) Calculation of the grant amount: the grant amount is calculated by multiplying the number of days per participant by the unit contribution applicable per day for the host country concerned, as specified in Annex IV of the Agreement. The calculation may include one travel day before the activity and one travel day following the activity (if relevant), and up to four additional days for participants receiving a green travel grant. The calculation must exclude accompanying persons.
 - In case of an interruption during the stay, the period of the interruption will not be counted when calculating the pocket money. In case of interruption due to

"force majeure", the participant may be allowed to continue the activities after the interruption (if possible within the conditions established in this Agreement).

- In case of termination by the participant of the agreement with the beneficiary due to "force majeure", the participant must be entitled to receive the amount of the grant corresponding at least to the actual duration of the activity period. Any remaining funds must be refunded to the beneficiary, except if agreed differently by both parties.

(b) Triggering event: the event that conditions the entitlement to the grant is that the participant has actually undertaken the activity for the specified period.

(c) Supporting documents:

Proof of attendance of the activity in the form of a declaration signed by the participant and by the host organisation, specifying: the name of the participant, the purpose of the activity, the venue, starting and end dates.

(d) Reporting:

- Participants must provide their feedback in terms of factual information and their appreciation of the activity period, its preparation and follow-up. The participants must use the standard on-line questionnaire provided by the European Commission (the participant report) when submitting their feedback.
- The beneficiary must report in the European Solidarity Corps reporting and management tool on all activities realised under the project.
- If the duration of an activity is longer than the one indicated in the agreement with the participant, the beneficiary must amend the agreement to take into account the longer duration, provided that the remaining grant amount allows it. In such case, the beneficiary must indicate in the European Solidarity Corps reporting and management tool the new start date and the end date in line with the approved amendment.

C1. Management Costs

- (a) Calculation of the grant amount: The grant amount is calculated by multiplying the number of activities for volunteering teams and/or the number of participants in individual volunteering activities, excluding accompanying persons, by the unit contributions applicable and capped, as specified in Annex IV of the Agreement.

- (b) Triggering event: the event that conditions the entitlement to the grant is that the beneficiary implements the project activities as applied for in the grant application and as approved by the National Agency.
- (c) Supporting documents: proof of activities implemented will be provided in the form of a description of these activities in the final report.
- (d) Reporting: the beneficiary must report in the European Solidarity Corps reporting and management tool on all activities realised under the project.

C2. Organisational support

- (a) Calculation of the grant amount: the grant amount is calculated by multiplying the number of days per participant by the unit contribution applicable per day for the host country concerned, as specified in Annex IV of the Agreement. The calculation may include one travel day before the activity and one travel day following the activity (if relevant), and up to four additional days for participants receiving a green travel grant. The calculation may include accompanying persons.

Persons taking part in preparatory visits are not considered for calculation of the organisational support grant (specific funding is available for preparatory visits).

- (b) Triggering event: the event that conditions the entitlement to the grant is that the participant has actually undertaken the activity.
- (c) Supporting documents:
Proof of attendance of the activity in the form of a declaration signed by the participant and by the host organisation, specifying: the name of the participant, the purpose of the activity, the venue, starting and end dates.
- (d) Reporting:
 - The beneficiary must report on in the European Solidarity Corps reporting and management tool on all activities realised under the project.
 - Participants in the activities must provide their feedback in terms of factual information and their appreciation of the activity period, its preparation and follow-up. The participants must use the standard on-line questionnaire provided by the European Commission (the participant report) when submitting their feedback

D. Inclusion Support

- (a) calculation of the grant amount: the grant amount is calculated by multiplying the number of activity days of each participant with fewer opportunities by the unit contribution applicable for the relevant host country, as specified in Annex IV of the Agreement. One travel day before the activity and one travel day following the activity, and up to four additional days for participants receiving a green travel grant may be included in the calculation. The calculation must exclude accompanying persons.
- (b) Triggering event: the event that conditions the entitlement to the grant is that the participant is a young person with fewer opportunities has actually undertaken the activity.
- (c) Supporting documents: proof of implementation of the additional measures and activities undertaken to promote social inclusion will be required, in the form of a description of these measures in the final report. Proof of attendance of the activity in the form of a declaration signed by the participant and the host organisation specifying: the name of the participant, the host organisation, the purpose of the activity, venue, starting and end dates. The declaration should also include make reference to the additional support received by the participant.
- (d) Reporting:
 - The beneficiary must report in the European Solidarity Corps reporting and management tool on all activities realised under the project
 - The beneficiary must specifically report in the European Solidarity Corps reporting and management tool on the barriers faced by the participant as well as on the additional measures and activities carried out to support his/her participation.

E. Preparatory visits

- (a) Calculation of the grant amount: the grant amount is calculated by multiplying the total number of persons participating in preparatory visits by the unit contribution applicable, as specified in Annex IV of the Agreement and with the limitations specified in the Programme Guide.
- (b) Triggering event: the event that conditions the entitlement to the grant is that the person has actually undertaken the preparatory visit.

Supporting documents: proof of attendance of the preparatory visit in the form of an agenda and a declaration signed by the participant and by the hosting organisation specifying the name of the person, the purpose of the activity.

F1. Online Linguistic Support (OLS)

The following provisions shall only apply to volunteering projects where the main language of instruction or work is one of the languages available in the Online Linguistic Support tool, and where the participant is not a native or fully proficient speaker of the language in question.

OLS language assessments

- Language assessment are provided for participants undertaking a mobility period for a minimum period of two months.
- The beneficiary must distribute OLS accesses to participants (after their selection for the activity), and must make every effort to ensure that all the allocated accesses are used by the selected participants.
- The beneficiary must ensure that participants take the OLS language assessment before their activity period.
- The beneficiary will be notified of the assessment results by the service provider.

OLS language courses

- Participants must have taken an OLS assessment before they can be awarded an access to follow an OLS language course (if available). Accesses to OLS language courses must be awarded to all participants willing to follow the course and according to the participant's linguistic needs.
- OLS course accesses must be distributed among the participants according to their needs. All participants having taken the language assessment have the opportunity to follow a language course, if the required language and level is available in the OLS tool.
- Participants with level B2 or higher in their main language of instruction or work (according to the result of the language assessment) have the opportunity to follow an OLS course either in that language or in the local language of the country, provided it is available in the OLS. It is up to the beneficiary to indicate this choice in the OLS tool.
- OLS language course accesses must be used in the period between the OLS assessment and the end of the mobility activity.

- The beneficiary must monitor the use of accesses on the basis of the information provided by the service provider.
- The beneficiary must make every effort to ensure that all the allocated accesses are actively used by the selected participants.

All accesses

- By signing the Volunteering agreement, participants commit to complete the OLS language assessment before the mobility period and to follow the OLS language course, if awarded.
- The beneficiary must act in line with the guidelines for use of OLS provided by the service provider.
- The beneficiary must report on the number of used language assessment and language course accesses in their reports.
- In case of unused or non-allocated accesses at the time of final beneficiary report submission, the NA may decide to take this into account for the allocation of accesses awarded to the beneficiary in the subsequent call years and/or selection rounds.

F2. Language learning support

Only applicable for volunteering Projects insofar as they concern activities lasting 60 days or more.

For cross-border activities this unit cost is eligible only for languages and/or levels not offered by the Online Language Support.

- (a) Calculation of the grant amount: the grant amount is calculated by multiplying the total number of participants receiving linguistic support by the unit contribution as specified in Annex IV of the Agreement. Participants that have received Online Linguistic Support will be excluded from this calculation
- (b) Triggering event: the event that conditions the entitlement to the grant is that the participant has actually undertaken language preparation in the language of instruction or work.
- (c) Supporting documents:
 - proof of attendance of language courses in the form of a declaration signed by the course provider, specifying the name of the participant, the language taught, the format and duration of the provided courses, or

- invoice for the purchase of learning materials, specifying the language concerned, the name and address of the body issuing the invoice, the amount and currency, and the date of the invoice, or
- in case the linguistic training is provided directly by the beneficiary: a declaration signed and dated by the beneficiary providing the training, specifying the name of the participant, the language taught, the format and duration of the linguistic training provided.]

[For Solidarity Projects:

A. Project management costs

- (a) Calculation of the grant amount: the grant amount is calculated by multiplying the number of months per project by the unit contribution applicable as specified in Annex IV of the Agreement.
- (b) Triggering event: the event that conditions the entitlement to the grant is that the group of young people have actually implemented the project.
- (c) Supporting documents: proof of project implementation will be provided in the form of a description of the undertaken activities in the final report.
- (d) Reporting:
 - the beneficiary must report on the solidarity project and provide information on the implemented project activities in the final report;
 - participants in the project must report via an on-line questionnaire providing their feedback on their participation in the project.

B. Coaching costs

- (a) Calculation of the grant amount: the grant amount is calculated by multiplying the working days of the coach by the unit contribution applicable for the country concerned as specified in Annex IV of the Agreement. A cap limiting the amount awarded for coaching costs will be set at maximum 12 days per project.
- (b) Triggering event: the event that conditions the entitlement to the grant is that the group of young people have used a coach for the purposes described in Annex II of the Agreement.
- (c) Supporting documents:
 - proof of involvement of the coach in the project will be provided in the form of a description of the undertaken activities in the final report.

- proof of the time spent on the project by the coach will be provided in the form of a time sheet including the name of the coach, the dates and the total number of days of work of the coach for the project.
- (d) Reporting: the beneficiary must report on the solidarity project and include information on the number of days of work and the role/involvement of the coach in the project in the final report.]

II. RULES APPLICABLE FOR THE BUDGET CATEGORIES BASED ON REIMBURSEMENT OF ACTUAL INCURRED COSTS

II.1. Conditions for the reimbursement of actual costs

Where the grant takes the form of a reimbursement of actual costs, the following conditions must apply:

- (a) they are incurred by the beneficiary;
- (b) they are incurred in the period set out in Article I.2.2.;
- (c) they are indicated in the estimated budget set out in Annex II or eligible following budget transfers in accordance with Article I.3.3;
- (d) they are incurred in connection with the Project as described in Annex II and are necessary for its implementation;
- (e) they are identifiable and verifiable, in particular are recorded in the beneficiary's accounting records and determined according to the applicable accounting standards of the country where the beneficiary is established and with the beneficiary's usual cost accounting practices;
- (f) they comply with the requirements of applicable tax and social legislation;
- (g) they are reasonable, justified, and comply with the principle of sound financial management, in particular regarding economy and efficiency;
- (h) they are not covered by a unit contribution as specified in Section I of this Annex.

II.2. Calculation of actual cost

[For Volunteering projects]

A. Exceptional costs

(a) Calculation of the grant amount: the grant is a reimbursement of 80% of the eligible costs actually incurred, of 80% of the eligible costs for expensive travel costs of eligible participants and of 100% of the eligible costs actually incurred for the participation of young people with fewer opportunities, for costs related to reinforced mentorship, visa related costs, residence permits, vaccinations, medical certifications etc.

(b) Eligible costs:

- Costs relating to a pre-financing guarantee lodged by the beneficiary where such guarantee is required by the NA, as specified in Article I.4.2 of the Agreement.
- Costs of travel in the most economical but also effective way for eligible participants for which the standard funding rule does not cover at least 70% of the eligible costs. The exceptional costs for expensive travel replace the separate travel grant.
- Costs incurred by organisations to support the participation of young people with fewer opportunities or with special needs on equal terms as others related to:
 - reasonable adjustments or investment in physical assets.
 - reinforced mentorship, i.e. the preparation, implementation and follow-up of tailor-made activities. Applicants must justify that the standard funding ("Inclusion support" unit cost per day per participant) does not cover at least 80 % of the costs incurred for reinforced mentorship. If awarded, the exceptional costs to support the participation of young people with fewer opportunities will replace the inclusion support grant.
- Costs connected to personal insurance for in-country activities.
- Recognition of academic and/or professional qualifications (e.g. certified copies, translations, administrative proceedings, aptitude tests, etc).
- Visa and visa-related costs, residence permits, vaccinations, medical certifications, clearance requirements costs.

(c) Supporting documents:

- Proof of the cost of the financial guarantee issued by the body providing the guarantee to the beneficiary, specifying the name and address of the body issuing the financial guarantee, the amount and currency of the cost of the guarantee, and providing the date and signature of the legal representative of the body issuing the guarantee.

- In the case of travel costs: proof of payment of the related costs on the basis of invoices specifying the name and address of the body issuing the invoice, the amount and currency, the date of the invoice and the travel route.
- In the case of costs to support the participation of young people with fewer opportunities: proof of payment of the related costs on the basis of invoices specifying the name and address of the body issuing the invoice, the amount and currency, and the date of the invoice;
- In the case of costs related to visas, residence permits and vaccinations, as well as other costs specified above: proof of payment on the basis of invoices specifying the name and address of the body issuing the invoice, the amount and currency, and the date of the invoice.

(a) Reporting:

- For direct costs: for each cost item in this budget category, the beneficiary must report the type of costs and the real amount of costs incurred
- For indirect costs: no reporting required.]
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[For Solidarity Projects:

A. Exceptional costs

- (a) Calculation of the grant amount: the grant is a reimbursement of 100% of the eligible costs actually incurred for the participation of young people with fewer opportunities (members of the group implementing the project)
- (b) Eligible costs: Costs to support the participation of young people with fewer opportunities or with special needs on equal terms as others;
- (c) Supporting documents: In the case of costs to support the participation of young people with fewer opportunities: proof of payment of the related costs on the basis of invoices specifying the name and address of the body issuing the invoice, the amount and currency, and the date of the invoice;
- (d) Reporting: The beneficiary must report on the solidarity project and provide information on the type of expenses related to the participation of young people with fewer opportunities (members of the group implementing the project) as well as the real amount of related costs incurred.]

III. CONDITIONS OF ELIGIBILITY OF PROJECT ACTIVITIES

- a) The beneficiary must ensure that the activities of the project for which grant support was awarded are eligible in accordance with the rules set out in the European Solidarity Corps Programme Guide.
- b) Travel time will not be considered when determining compliance with minimum eligible duration of mobility activities specified in the Programme Guide.
- c) Activities that are not compliant with the rules set out in the Programme Guide (as complemented by the rules set out in this Annex) must be declared ineligible by the NA and the grant amounts corresponding to those activities must be recovered in full. The recovery must cover all budget categories for which a grant was awarded in relation to the activity that is declared ineligible.
- d) The eligible minimum duration of activities specified in the European Solidarity Corps Programme Guide is the minimum duration of the activity excluding time for travel.
- e) Regarding costs incurred in relation to Preparatory Visits (where applicable) by participants who did not subsequently undertake any Individual Volunteering or Volunteering Teams activities, the beneficiary shall submit a justification to the National Agency explaining the reasons for not implementing activities in relation to the young participant concerned. The National Agency may approve such a request based on this justification.

IV. FINAL REPORT

[For Solidarity Projects:

The final report will be assessed in conjunction with the participant reports, and it will be scored on a total of maximum 100 points. A common set of evaluation criteria will be used to measure the extent to which the project was implemented in line with Annex II of this Agreement. The beneficiary must submit the final report after the project end date or whenever the foreseen activities have been completed.]

[For Volunteering Projects:

The final report will be assessed in conjunction with the participant reports, and it will be scored on a total of maximum 100 points. A common set of evaluation criteria will be used to measure the extent to which the project was implemented in line with the targets defined in Annex II of this Agreement and the European Solidarity Corps quality standards.

The beneficiary must submit the final report after the project end date. Earlier submissions of the final report could be considered as a request for premature termination of the Grant Agreement and may result in a lower evaluation score.]

V. GRANT REDUCTION FOR POOR, PARTIAL OR LATE IMPLEMENTATION

Poor, partial or late implementation of the Project may be established by the NA on the basis of the final report submitted by the beneficiary (including reports from individual participants taking part in the activities).

In addition, the NA may also consider information received from any other relevant source, proving that the Project is not implemented in accordance with the contractual provisions. Other sources of information may include monitoring visits, Quality Label reports, desk checks or on-the-spot checks undertaken by the NA.

The final report will be assessed on the basis of quality criteria and scored on a total of maximum 100 points. If the final report scores below 50 points in total, the NA may reduce the final grant amount on the basis of poor, partial or late implementation of the action even if all activities reported were eligible and actually took place.

[For holders of Quality Label only: If the NA considers that the implementation of the Project does not respect the quality commitment undertaken by the beneficiary, the NA may in addition or alternatively initiate the observation procedure and require the beneficiary to develop and implement an action plan within an agreed timeframe to ensure respect of the applicable requirements. If the beneficiary does not implement the action plan in a satisfactory manner by the due date, the NA may suspend or withdraw the Quality Label.]

[For Volunteering Projects:

The final report will be assessed in conjunction with the reports from the participants, using a common set of quality criteria focusing on:

- The extent to which the action was implemented in line with the approved grant request application (type and number of activities, number of participants, policy priorities).
- The quality of the learning outcomes and the arrangements for the recognition/validation of the learning outcomes of participants

- The impact on the target groups, participants and participating organisation(s)
- The quality of the practical arrangements provided in support of the activity, in terms of preparation, monitoring and support to participants during their activity
- The extent to which the grant amounts due to participants were transferred to them in accordance with the contractual provisions set out in the agreement between the respective beneficiary and participant following the templates provided in Annex V of the Agreement.]

A grant reduction based on poor, partial or late implementation may be applied to the final amount of organisational support and may be of:

- 25% if the final report scores at least 40 points and below 50 points;
- 50% if the final report scores at least 25 points and below 40 points;
- 75% if the final report scores below 25 points.

In addition, the NA may reduce the final grant amount for organisational support by up to 100% in case the final report evaluation, a monitoring visit or on-the-spot check shows that European Solidarity Corps quality standards have not been respected.]

[For Solidarity Projects:

The final report will be assessed in conjunction with the reports from the participants, using a common set of quality criteria focusing on:

- The extent to which the action was implemented in line with the approved grant application
 - The quality of the learning outcomes and the arrangements for the recognition/validation of the learning outcomes of participants
 - The impact on the target groups, community and participants.
- A grant reduction based on poor, partial or late implementation may be applied to the final amount of project management costs and may be of:
 - 25% if the final report scores at least 40 points and below 50 points;

- 50% if the final report scores at least 25 points and below 40 points;
- 75% if the final report scores below 25 points.]

VI. GRANT MODIFICATIONS

[For volunteering projects:

The total maximum grant amount indicated in Article I.3.1 may be increased with an amendment to the Grant Agreement as follows.

Up until the expiry of 12 months from the start of the project, the beneficiary may submit justified requests for additional funds for exceptional costs if these additional needs cannot be covered with a transfer of funds within the existing grant amount without negatively affecting the delivery of targets specified in Annex II.

The National Agency will consider such requests if funds remain available for this purpose. In case a request for additional funds is approved, the National Agency shall assess if the amendment for additional funds must be made immediately, or at a later stage.

The National Agency shall make its assessment based on the pre-financing amount already available to the beneficiary, the amount of additional funds required, and the nature of the approved expenses. The National Agency shall issue the required amendment as a matter of urgency if it is necessary for the beneficiary to comply with rules on provision of inclusion support, as specified in the Special Conditions.

In all cases, the amendment shall be issued at the latest one month before the end of the project and no later than 15 months after the project start date.]

[For Solidarity Projects: Not applicable.]

VII. CHECKS OF GRANT BENEFICIARY AND PROVISION OF SUPPORTING DOCUMENTS

In accordance with Article II.27 of the Annex I of the Agreement, the beneficiary may be subject to checks and audits in relation to the Agreement. Checks and audits aim at

verifying whether the beneficiary managed the grant in respect of the rules set out in the Agreement, in order to establish the final grant amount to which the beneficiary is entitled.

A final report check must be performed for all projects. In addition, the project may be subject to further desk check or on-the-spot check if the project Agreement is included in the NA sample required by the European Commission or if the NA has selected it for a targeted check based on its risk assessment.

For final report check and desk check, the beneficiary must supply to the NA physical or electronic copies of supporting documents specified in the section I.2, unless the NA makes a request for originals to be delivered. The NA must return original supporting documents to the beneficiary upon its analysis thereof. If the beneficiary is legally not authorised to send original documents for final report or desk checks, a copy of the supporting documents may be sent instead.

For any type of check the beneficiary may be requested by the NA to provide additional supporting documents or evidence that are typically required for another type of check, as specified in article II.27 of the General Conditions.

The different checks must include the following:

a) Final report check

The final report check is undertaken at final report stage at the NA premises in order to establish the final grant amount to which the beneficiary is entitled.

The beneficiary's final report to the National Agency must include the following information:

- Unit contributions consumed for budget categories:
 - Travel support
 - Organisational support
 - Project management costs
 - Inclusion support
 - Pocket money
 - Language learning support
 - Coaching costs
 - Preparatory visit

- Actual costs incurred for budget categories:
 - Exceptional costs

b) Desk check

Desk check is an in-depth check of supporting documents at the NA premises that may be conducted at or after the final report stage. Upon request, the beneficiary must submit to the National Agency the supporting documents for all budget categories.

c) On-the-spot checks

On-the-spot checks are performed by the NA at the premises of the beneficiary or at any other premises relevant for the execution of the Project. During on-the-spot checks, the beneficiary must make original supporting documentation for all budget categories available for review by the National Agency, and must enable the National Agency access to the recording of project expenses in the beneficiary's accounts.

On-the-spot checks can take the following forms:

- **On-the-spot check during project implementation:** this check is undertaken during the implementation of the Project in order for the National Agency to directly verify the reality and eligibility of all project activities and participants;
- **On-the-spot check after completion of the project:** this check is undertaken after the end of the Project and usually after the final report check.

In addition to providing all supporting documentation, the beneficiary must enable the National Agency access to the recording of project expense in the beneficiary accounts.

- ***Systems check [Not Applicable for Solidarity Projects]***
- The systems check is performed to establish the beneficiary's system for making its regular grant claims in the context of the programme as well as its compliance with the commitments undertaken as a result of the Quality Label. The systems check is performed to establish the beneficiary's compliance with the implementation standards committed to in the framework of the European Solidarity Corps. The beneficiary must enable the National Agency to verify the reality and eligibility of all project activities and participants by all documentary means, including video and photographic records of the activities undertaken, in order to rule out double funding or other irregularities.