

Circular 02/2019

To All Project Beneficiaries and Project Partners

From Financial Control Unit

Date 1st November 2019 (Updated)

Subject Time recording by Project Beneficiaries whose staff are involved in single/multiple European Territorial Cooperation projects (potentially including ENI CBC Med projects), and/or other EU-Funded projects including Direct Funds managed by the European Commission and/or who perform other duties (e.g. administrative duties related to the department/Ministry they work in)

Background

The aim of this Circular is to clarify the eligibility of staff costs particularly when a beneficiary is involved in several EU-Funded projects and/or whose (i.e. the beneficiary's) staff perform other duties. Needless to say, the beneficiary should have in place a robust time registration system. In practice, staff costs are generally claimed against the actual time dedicated on a project. Therefore, individuals employed on an EU-Funded project should register their working time on timesheets or on a time registration system, clocking the time duration depending on which project/activity they have been working on¹.

The registration of the working time is not required when a staff member works on the project on a full-time basis or on a part-time basis with a fixed percentage of time. However, a description of the work carried out on the project is required just the same.

Registration of time devoted to EU-Funded projects

The project-related working time performed by a staff member must be recorded daily in a timely manner. Hence, the recording time of each staff member working on an EU-Funded project/s should be inputted on a timesheet or on a time registration system, on a daily basis. **For each day timesheets must incorporate the entire hours worked on that day; thus they should encompass 100% of the actual working time dedicated to the specific project at hand together with other projects and other duties (if any) during that same day.** It is imperative that the time registration system be applied to all members of staff, subject to the note (in italics) in the preceding paragraph. Additionally, timesheets must include the overall description of the tasks carried out by staff members.

¹ The template is found in Annex 1 to this Circular

Moreover, it is pertinent to point out that, as stipulated in the *National Complementary Requirements Territorial Cooperation Programmes & the ENI CBC Med Programme 2014 – 2020*, in principle, the average number of hours which may be claimed per day should be 8. However, this may be exceeded if a justification is provided with the respective staff costs claim. It is best practice that on a weekly basis, the timesheets, apart from being endorsed by the staff member, are to be approved and signed by a senior manager/director (who is at a higher level than the staff member concerned) to validate their correctness.

In situations whereby the beneficiaries are engaged in multiple EU-Funded projects, the beneficiary must furnish a monthly timesheet for each staff member wherein the latter would have registered the time worked on all projects and other (administrative) activities performed. This measure will serve as a safeguard against employees recording the same time on two or more projects, and therefore this measure prevents double funding.

It is to be emphasized that the specific dates and time when the staff member worked on a specific project/task should be recorded accurately on the timesheet.

Minimum requirements to be included in a timesheet/time registration system

When a beneficiary has the role of a Lead Partner or Project Partner, the below are the minimum requirements that need to be inserted in timesheets or the time registration system:

- Project code.
- Project Title.
- Organisation Name.
- Name of the staff member.
- Job Title/Role of the employee.
- Clear identification whether staff member is working part-time with a flexible number of hours on the project or contracted on an hourly basis.
- Calendar Month and Year (or the reporting period).
- Date when work on project was carried out.
- Hours worked on the specific project.
- Description of tasks carried out on the specific project.
- Hours worked in other projects (it is expected that a column with the number of working hours and a column with the description of tasks be added for each project).
- Hours worked on other activities (it is expected that a column with the number of working hours and a column with a general description of these activities, be included).
- Total number of hours worked in total (the actual 100% of the working time).
- Hourly rate (where applicable).
- Total cost (where applicable).
- Date and signature of the staff member.
- Date and signature of the senior manager/director in relation to the staff member.

Conclusion

The practice of having a reliable and appropriate time registration system in an organisation (as required by this Circular) is intended to reduce risks related to the eligibility of staff costs being reported. Ultimately, the time recording system is necessary for:

- Determining the working time spent on activities related to project/s; and
- Justifying staff members' time spent on the project.