



Internal Security Fund (ISF)

Call for proposals

to support small companies in implementing the regulation to address
the dissemination of terrorist content online

(ISF-2021-AG-TCO)

Version 1.0
20.10.2021



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS
Directorate E – HOME Affairs Funds
E.4 – Union actions and Procurement

CALL FOR PROPOSALS

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0. Introduction

This is a call for proposals for EU **action grants** in the field of Prevention and countering of radicalisation under the **Internal Security Fund (ISF)**.

The regulatory framework for this EU Funding Programme is set out in:

- Regulation 2018/1046 ([EU Financial Regulation](#))
- The basic act ([ISF Regulation](#) 2021/1149)¹



The call is launched in accordance with the draft Commission Implementing Decision on the financing of the thematic facility under the Internal Security Fund (ISF) and the adoption of the work programme for 2021-2022. The work programme, which includes this call for proposals, is under finalisation. Therefore, **this call is published subject to the adoption of the 2021-2022 ISF thematic facility including this call as foreseen** and this call could be modified or would be cancelled if this would not materialise. As soon as adopted, the 2021-2022 ISF thematic facility will be published online on the [Migration and Home Affairs Europa website](#) and on the [Funding & tender opportunities website](#).

The call is managed by the **European Commission, Directorate-General for Migration and Home Affairs (DG HOME)**.

The call covers only one **topic: ISF-2021-AG-TCO — TCO**

Each project application under the call must address this topic.

We invite you to read the **call documentation** carefully, and in particular this Call Document, the Model Grant Agreement, the [EU Funding & Tenders Portal Online Manual](#) and the [EU Grants AGA — Annotated Grant Agreement](#).

These documents provide clarifications and answers to questions you may have when preparing your application:

- the [Call Document](#) outlines the:
 - background, objectives, scope, activities that can be funded and the expected results and impact (sections 1 and 2)
 - timetable and available budget (sections 3 and 4)
 - admissibility and eligibility conditions (including mandatory documents; sections 5 and 6)
 - criteria for financial and operational capacity and exclusion (section 7)
 - evaluation and award procedure (section 8)
 - award criteria (section 9)
 - legal and financial set-up of the Grant Agreements (section 10)
- the [Online Manual](#) outlines the:
 - procedures to register and submit proposals online via the EU Funding & Tenders Portal ('Portal')

¹ Regulation (EU) 2021/1149 of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund (OJ L 251, 15.7.2021, p.94).

- recommendations for the preparation of the application
- the AGA — Annotated Grant Agreement contains:
 - detailed annotations on all the provisions in the Grant Agreement you will have to sign in order to obtain the grant (*including cost eligibility, payment schedule, accessory obligations, etc.*)

1. Background

The prevention of radicalisation is a cornerstone of the EU's counterterrorism efforts set out in the [2020 Counter-Terrorism Agenda](#)². Promoting inclusion and providing opportunities through education, culture, youth and sports can contribute to making societies more cohesive and to preventing radicalisation. Strengthening preventive action in prisons, recognising specific challenges raised by returning foreign terrorist fighters as well as rehabilitation and reintegration of terrorist offenders is likewise cited as fundamental in the Counter-Terrorism Agenda.

The Agenda further sheds light on violent extremist's and terrorist's efforts to shift recruitment and propaganda online. This has led to the emergence of globally connected individuals and transnational online communities where violent extremist and terrorist ideologies are flourishing. Countering this spread of violent extremist and terrorist ideologies online is recognized as a matter of urgency.

With the EU Internet Forum, the European Commission established an initiative that brings together tech industry, policy makers and academia to address new challenges in the fight against violent extremist and terrorist content online. The EU Internet Forum develops guidance on online content moderation of violent extremist material.

Voluntary cooperation is necessary but is no longer adequate to counter the threat stemming from violent extremist and terrorist content online. Therefore, [the Regulation \(EU\) 2021/784³ addressing the dissemination of terrorist content online \(TCO Regulation\)](#) entered into force on 7 June 2021 and will be applicable as of 7 June 2022 to all hosting service providers, offering services which disseminate information to the public in the European Union.

The TCO Regulation tackles the dissemination of terrorist content, as well as the efforts to radicalise and to recruit new followers online by requiring hosting service providers to remove illegal terrorist content within one hour, upon receipt of a removal order, and to take specific measures in a proactive manner. At the same time, the TCO Regulation includes multiple and strong safeguards to strengthen accountability and transparency about measures taken to remove terrorist content and to prevent erroneous removal of legitimate speech online. Member States will designate competent authorities which will issue and scrutinise removal orders, oversee the implementation of specific measures and if needed, impose penalties. These competent authorities will also provide a contact point to handle hosting service providers' requests for clarification and feedback.

This novel Regulation contains new obligations for tech companies. While big tech companies have the technical capabilities, human verification capacity and knowledge to implement the TCO Regulation, the European Commission recognises that smaller companies lack these financial, technical and human resources and knowledge. At the same time, smaller companies are increasingly targeted by malicious actors. This development is a result of effective deplatforming and content moderation efforts by

² COM(2020) 795 final

³ OJ L 172, 17.5.2021, p. 79–109

larger tech companies. While it showcases the success of content moderation measures and the relevance of the TCO Regulation, it highlights the need of support for smaller companies in capacity-building and knowledge sharing to adopt the requirements of the TCO Regulation.

The necessary support for small companies to implement the Regulation is not yet provided EU-wide, and on a technical level, cannot be provided by the European Commission. Despite initiatives, such as Europol currently cooperating with approximately 20 small companies and aiming to double this number in the coming years, as well as the objective of big tech companies to support smaller online platforms to tackle terrorist and violent extremist content, major challenges and gaps in supporting small companies remain.

The effective roll out of the Regulation by tech companies of all sizes is fundamental to effectively curb the spread of terrorist content online. Additionally, a lack of support to small companies may lead to the erroneous removal of legal content, in an attempt to comply with the TCO Regulation, infringing fundamental freedoms. Taking into account the EU-wide applicability of the TCO Regulation, it is critical that support for smaller companies to implement the Regulation is provided for at EU level.

2. Objectives – Themes and priorities – Activities that can be funded – Expected impact

Objectives

The objective is to **support small⁴ hosting service providers (HSP)**, i.e. a provider of services consisting of the storage of information provided by and at the request of a content provider to disseminate content to the public⁵, **in complying with the requirements of the TCO Regulation, in particular detecting and removing terrorist content online.**

Project applications submitted under the present call for proposals must develop such support addressing all the three following priorities:

1. To **inform** and **increase awareness** among small HSPs about the TCO Regulation's rules and requirements,
2. To **support small HSPs in the implementation** of the TCO Regulation, in particular to develop, implement and roll out any tools, frameworks and mechanisms to address the dissemination of terrorist content online on their platforms,
3. To **share** experience, tools and best practices of the implementation process and of tools, frameworks and mechanisms addressing the dissemination of terrorist content online.

Scope- activities and outcomes

The present call for proposals aims at funding projects that will provide concrete and hands-on support. For each priority, projects must aim at achieving one or more of the following outcomes:

Priority 1 – Inform and increase awareness among small HSPs about the TCO Regulation's rules and requirements:

⁴Further defined below in the section target groups.

⁵ See definition in Article 2 of the Regulation (EU) 2021/784

- Develop learning materials about the TCO Regulation, including an understanding of what constitutes terrorist content as defined by the Regulation and its requirements,
- Hold workshops, trainings and other knowledge-sharing activities for small HSPs on the TCO Regulation,
- Disseminate learning materials and tools to inform about the TCO Regulation.

Priority 2 – Support the implementation of the TCO Regulation by supporting small HSPs to:

- Develop and set up effective mechanisms to identify, remove or disable access to terrorist content within the relevant time frame and geographical scope,
- Understand the legality of content posted on their platform, i.e. understanding the taxonomy of what is terrorist content online as defined by the TCO Regulation,
- Understand and verify the precision of processes and systems (including Artificial Intelligence) to identifying terrorist content online, including through human verification and oversight.
- Develop and apply terms and conditions for their service that address the misuse of its services for the dissemination of terrorist content to the public,
- Develop and implement specific measures to address the misuse of the service, which can include technical and operational means to identify and remove terrorist content, user reporting or flagging of terrorist content, raising awareness among moderators and users of terrorist content.
- Preserve content and related data that was removed for administrative or judicial use while ensuring appropriate technical and organisational safeguards,
- Set up contact points and legal representatives,
- Produce meaningful transparency reports,
- Establish and implement effective and accessible mechanisms allowing users to submit complaints and to request reinstatement of removed content,
- Establish mechanism to inform users of removal or disabled access to terrorist content and inform users of what is considered terrorist/ violent extremist content.

Priority 3 – Share experience, best practices and tools for implementing the TCO Regulation:

- Provide trainings, workshops, learning materials and other capacity-building activities to share experiences and best practices among small HSPs,
- Inform, provide tools or data sets that can facilitate the implementation of the requirements set out in the TCO Regulation,
- Support collaborative efforts, such as the sharing of data between companies, so that companies can train their models to recognise terrorist content in a secure way,

- Consolidate learnings and good practices to disseminate them widely among small HSPs, foster networking between the small HSPs for possible mutual help and promote public-private endeavours where appropriate.

- Target groups (who are the main *final* beneficiaries)

The target groups which will benefit of the Call are **small companies**, which qualify as hosting service providers under the TCO Regulation. For the purpose of this call for proposals, **small companies means:**

- Microenterprises as defined within the Recommendation 2003/361/EC concerning the definition of micro, small and medium-sized enterprise⁶.
- Small enterprises within the definition of the same Recommendation⁷ can be included in the target group exceptionally, if demonstrated, that they are particularly exposed to terrorist content.

The target groups described above is not equivalent to applicants who can apply to the Call to become beneficiaries.

- Target countries

All small service providers, irrespective of the country of their main establishment shall be targeted, if they offer a relevant service in the European Union.

Expected impact

- Increase awareness about the TCO Regulation and requirements among small HSPs,
- Increase number of small HSPs that implement the TCO Regulation effectively,
- Increase the volume of TCO removed by small HSPs and enhance their communication with competent authorities,
- Established contacts between small HSPs to exchange best practices among each other.

Additional considerations applicable to this call

The proposal should outline the strategy of how to reach most effectively the target audience and how to disseminate consolidated learnings among them. Applicants need to demonstrate the type of support that can be provided to facilitate the implementation of the TCO Regulation. Where the applicants and their affiliated entities have expertise in addressing some but not all of the requirements of the TCO Regulation, this should be clearly stated in the application.

All projects need to take into account the safeguarding of fundamental rights protected in the Union⁸ when establishing, implementing, developing and rolling out measures to achieve the above mentioned outcomes.

As terrorist content is available in various languages and geographical regions, content moderation is a challenge. The applicants are expected to explain in their application how they would tackle this issue to ensure that they are able to support

⁶ A microenterprise is defined as an enterprise which employs fewer than 10 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 2 million..

⁷ A small enterprise is defined as an enterprise which employs fewer than 50 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 10 million.

⁸ In particular those guaranteed by the Charter of Fundamental Rights of the European Union.

small HSPs that provide services in multilingual and geographically dispersed context of the EU.

In the section 2.7 of the application form about risk management, the applicants are invited to describe how they plan to mitigate the risk of misuse of the materials/tools developed to identify or flag/ report terrorist content online by malicious actors.

3. Available budget

The available call budget is **EUR 4 000 000**.

We reserve the right not to award all available funds.

4. Timetable and deadlines

Timetable and deadlines (indicative)	
Call opening:	20 October 2021
Deadline for submission:	<u>26 January 2022 – 17:00:00 CET</u> <u>(Brussels)</u>
Evaluation:	January-June 2022
Information on evaluation results:	June-July 2022 ⁹
GA signature:	October/November 2022

5. Admissibility and documents

Proposals must be submitted before the **call deadline** (see *timetable* section 4).

Proposals must be submitted **electronically** via the Funding & Tenders Portal Electronic Submission System (accessible via the Topic page in the [Search Funding & Tenders](#) section). Paper submissions are NOT possible.

Proposals (including annexes and supporting documents) must be submitted using the forms provided *inside* the Submission System (⚠ NOT the documents available on the Topic page — they are only for information).

Proposals must be **complete** and contain all the requested information and all required annexes and supporting documents:

- Application Form Part A — contains administrative information about the participants (future coordinator, beneficiaries and affiliated entities) and the summarised budget for the project (*to be filled in directly online*)
- Application Form Part B — contains the technical description of the project (*to be downloaded from the Portal Submission System, completed and then assembled and re-uploaded*)

⁹ In the interest of equal treatment of applicants, the Commission cannot provide any information on the outcome of the call for proposals before the official announcement of the results.

- **mandatory annexes and supporting documents** (*to be uploaded*):
 - detailed budget table: not applicable
 - CVs of core project team: not applicable
 - activity reports of last year: not applicable
 - list of previous projects (key projects for the last 4 years) (*template available in Part B but to be submitted as a separate annex*).

At proposal submission, you will have to confirm that you have the **mandate to act** for all applicants. Moreover you will have to confirm that the information in the application is correct and complete and that the participants comply with the conditions for receiving EU funding (especially eligibility, financial and operational capacity, exclusion, etc). Before signing the grant, each beneficiary and affiliated entity will have to confirm this again by signing a declaration of honour (DoH). Proposals without full support will be rejected.

Your application must be **readable, accessible and printable**.

Proposals are limited to maximum **50 pages** (Part B without annexes). Evaluators will not consider any additional pages.

You may be asked at a later stage for further documents (*for legal entity validation, financial capacity check, bank account validation, etc*).

 For more information about the submission process (including IT aspects), consult the [Online Manual](#).

6. Eligibility

Eligible participants (eligible countries)

In order to be eligible, the applicants (beneficiaries and affiliated entities) must:

- be legal entities (public or private bodies)
- be established in one of the eligible countries, i.e.:
 - EU Member States (including overseas countries and territories (OCTs)), excluding Denmark¹⁰,
 - non-EU countries¹¹: without any limitation as long as relevant for the call for proposals in view of their advanced competences.

Beneficiaries and affiliated entities must register in the [Participant Register](#) — before submitting the proposal — and will have to be validated by the Central Validation Service (REA Validation). For the validation, they will be requested to upload documents showing legal status and origin.

Other entities may participate in other consortium roles, such as associated partners, subcontractors, third parties giving in-kind contributions, etc (see section 13).

Specific cases

Exceptional funding — Entities from third countries are only exceptionally eligible, if the granting authority considers their participation essential for the implementation of the action.

¹⁰ In accordance with Articles 1 and 2 of Protocol No 22 on the position of Denmark, annexed to the TEU and to the TFEU, Denmark is not taking part in the adoption of Regulation (EU) 2021/1149 and is not bound by it or subject to its application.

¹¹ A non-EU country is a country, which is not an EU Member State.

Natural persons — Natural persons are NOT eligible (with the exception of self-employed persons, i.e. sole traders, where the company does not have legal personality separate from that of the natural person).

International organisations — International organisations are eligible. The rules on eligible countries do not apply to them.

Entities without legal personality — Entities which do not have legal personality under their national law may exceptionally participate, provided that their representatives have the capacity to undertake legal obligations on their behalf, and offer guarantees for the protection of the EU financial interests equivalent to that offered by legal persons¹².

EU bodies — EU bodies (with the exception of the European Commission Joint Research Centre) can NOT be part of the consortium.

Associations and interest groupings — Entities composed of members may participate as 'sole beneficiaries' or 'beneficiaries without legal personality'¹³.  Please note that if the action will be implemented by the members, they should also participate (either as beneficiaries or as affiliated entities, otherwise their costs will NOT be eligible).

Countries currently negotiating association agreements — Beneficiaries from countries with ongoing negotiations (see *list above*) may participate in the call and can sign grants if the negotiations are concluded before grant signature (with retroactive effect, if provided in the agreement).

EU restrictive measures — Special rules apply for certain entities (e.g. entities subject to [EU restrictive measures](#) under Article 29 of the Treaty on the European Union (TEU) and Article 215 of the Treaty on the Functioning of the EU (TFEU)¹⁴ and entities covered by Commission Guidelines No [2013/C 205/05](#)¹⁵). Such entities are not eligible to participate in any capacity, including as beneficiaries, affiliated entities, associated partners, subcontractors or recipients of financial support to third parties (if any).

 For more information, see [Rules for Legal Entity Validation, LEAR Appointment and Financial Capacity Assessment](#).

Consortium composition

Proposals must be submitted by:

- minimum 3 applicants (beneficiaries; not affiliated entities) from 3 different eligible countries.
- the following entities can NOT apply as coordinator:
 - entities established outside of EU Member States,
 - international organisations¹⁶.

Eligible activities

¹² See Article 197(2)(c) EU Financial Regulation [2018/1046](#).

¹³ For the definitions, see Articles 187(2) and 197(2)(c) EU Financial Regulation [2018/1046](#).

¹⁴ Please note that the EU Official Journal contains the official list and, in case of conflict, its content prevails over that of the [EU Sanctions Map](#).

¹⁵ Commission guidelines No [2013/C 205/05](#) on the eligibility of Israeli entities and their activities in the territories occupied by Israel since June 1967 for grants, prizes and financial instruments funded by the EU from 2014 onwards (OJEU C 205 of 19.07.2013, pp. 9-11).

¹⁶ The term "international organisations" is used as defined in Article 156 of the FR (Euratom 2018/1046);

Eligible activities are the ones set out in section 2 above.

Financial support to third parties is not allowed.

Other important considerations

Proposals focusing on

- supporting Member States in implementing the TCO Regulation,
- supporting the establishment of competent authorities,
- supporting HSPs that are not considered “small” following the Definition in Recommendation 2003/361/EC,
- supporting small HSPs in only one member state.

are not considered as relevant for funding under this call.

Projects should take into account the results of projects supported by other EU funding programmes. The complementarities must be described in the project proposals (Part B of the Application Form).

Projects should comply with EU policy interests and priorities (*such as environment, social, security, industrial and trade policy, etc.*).

Duration

Projects must be 24 months (extensions are possible, if duly justified and through an amendment).

Project budget

Project budgets (maximum grant amount) must range between EUR 1 000 000 and EUR 1 500 000.

Ethics

Projects must comply with:

- highest ethical standards
- EU values based on Article 2 of the Treaty on the European Union and Article 21 of the EU Charter of Fundamental Rights and
- other applicable EU, international and national law.

Applications should pay appropriate attention to the effects of the project on individual rights and freedoms, and indicate the measures taken to limit or remedy such effects.

Applicants must show in their application that they respect ethical principles and EU values based on Article 2 of the Treaty on the European Union and Article 21 of the EU Charter of Fundamental Rights.

Projects involving ethics issues may be made subject to specific ethics rules.

Security

Projects involving EU classified information must undergo security scrutiny to authorise funding and may be made subject to specific security rules (detailed in a security aspects letter (SAL) which is annexed to the Grant Agreement).

These rules (governed by Decision [2015/444](#)¹⁷ and its implementing rules and/or national rules) provide for instance that:

- projects involving information classified TRES SECRET UE/EU TOP SECRET (or equivalent) can NOT be funded
- classified information must be marked in accordance with the applicable security instructions in the SAL
- information with classification levels CONFIDENTIEL UE/EU CONFIDENTIAL or above (and RESTREINT UE/ EU RESTRICTED, if required by national rules) may be:
 - created or accessed only on premises with facility security clearing (FSC) from the competent national security authority (NSA), in accordance with the national rules
 - handled only in a secured area accredited by the competent NSA
 - accessed and handled only by persons with valid personnel security clearance (PSC) and a need-to-know
- at the end of the grant, the classified information must either be returned or continue to be protected in accordance with the applicable rules
- action tasks involving EU classified information (EUCI) may be subcontracted only with prior written approval from the granting authority and only to entities established in an EU Member State or in a non-EU country with a security of information agreement with the EU (or an administrative arrangement with the Commission)
- disclosure of EUCI to third parties is subject to prior written approval from the granting authority.

Please note that, depending on the type of activity, facility security clearing may have to be provided before grant signature. The granting authority will assess the need for clearing in each case and will establish their delivery date during grant preparation. Please note that in no circumstances can we sign any grant agreement until at least one of the beneficiaries in a consortium has facility security clearing.

Beneficiaries must ensure that their projects are not subject to national/third-country security requirements that could affect implementation or put into question the award of the grant (e.g. *technology restrictions, national security classification, etc*). The granting authority must be notified immediately of any potential security issues.

Overview eligibility conditions

	ISF-2020-AG-TCO
Consortium composition – minimum number of	
Entities	3
Member States participating	3 ¹⁸

¹⁷ See Commission Decision 2015/544/EU, Euratom of 13 March 2015 on the security rules for protecting EU classified information (OJ L 72, 17.3.2015, p. 53).

¹⁸ at least 1 Member State participating in ISF – coordinator

in ISF or third-countries	
Consortium composition – participation of public entities as	
Coordinators	Yes
Beneficiaries	Yes
Consortium composition – participation of <u>non-profit</u> private organisations established <u>in</u> the EU Member States (including overseas countries and territories (OCTs)), excluding Denmark, as	
Coordinators	Yes
Beneficiaries	Yes
Consortium composition – participation of <u>for-profit</u> private organisations established <u>in</u> the EU Member States (including overseas countries and territories (OCTs)), excluding Denmark, as	
Coordinators	Yes
Beneficiaries	Yes
Consortium composition – International Organisations can participate as	
Coordinators	No
Beneficiaries	Yes
Consortium composition – participation of <u>non-profit</u> organisations established <u>outside</u> of EU Member States, as	
Coordinators	No
Beneficiaries	Yes
Consortium composition – participation of <u>for-profit</u> private organisations established <u>outside</u> the EU Member States, as	
Coordinators	No
Beneficiaries	Yes
Duration of projects (in months)	
	24 (exactly)
Project budget – maximum grant amount	
Minimum (EUR)	1 000 000
Maximum (EUR)	1 500 000

7. Financial and operational capacity and exclusion

Financial capacity

Applicants must have **stable and sufficient resources** to successfully implement the projects and contribute their share. Organisations participating in several projects must have sufficient capacity to implement all these projects.

The financial capacity check will be carried out on the basis of the documents you will be requested to upload in the [Participant Register](#) during grant preparation (e.g. *profit and loss account and balance sheet, business plan, audit report produced by an approved external auditor, certifying the accounts for the last closed financial year, etc.*). The analysis will be based on neutral financial indicators, but will also take into account other aspects, such as dependency on EU funding and deficit and revenue in previous years.

The check will normally be done for all beneficiaries, except:

- public bodies (entities established as public body under national law, including local, regional or national authorities) or international organisations
- if the individual requested grant amount is not more than EUR 60 000.

If needed, it may also be done for affiliated entities.

If we consider that your financial capacity is not satisfactory, we may require:

- further information
 - an enhanced financial responsibility regime, i.e. joint and several responsibility for all beneficiaries or joint and several liability of affiliated entities (*see below, section 10*)
 - prefinancing paid in instalments
 - (one or more) prefinancing guarantees (*see below, section 10*)
- or
- propose no prefinancing
 - request that you are replaced or, if needed, reject the entire proposal.

 For more information, see [Rules for Legal Entity Validation, LEAR Appointment and Financial Capacity Assessment](#).

Operational capacity

Applicants must have the **know-how, qualifications** and **resources** to successfully implement the projects and contribute their share (including sufficient experience in projects of comparable size and nature).

This capacity will be assessed together with the 'Quality' award criterion, on the basis of the competence and experience of the applicants and their project teams, including operational resources (human, technical and other) or, exceptionally, the measures proposed to obtain it by the time the task implementation starts.

If the evaluation of the award criterion is positive, the applicants are considered to have sufficient operational capacity.

Applicants will have to show their capacity via the following information:

- general profiles (qualifications and experiences) of the staff responsible for managing and implementing the project
- description of the consortium participants
- list of previous projects (key projects for the last 4 years).

Additional supporting documents may be requested, if needed to confirm the operational capacity of any applicant.

Public bodies, Member State organisations and international organisations are exempted from the operational capacity check

Exclusion

Applicants which are subject to an **EU exclusion decision** or in one of the following **exclusion situations** that bar them from receiving EU funding can NOT participate¹⁹:

- bankruptcy, winding up, affairs administered by the courts, arrangement with creditors, suspended business activities or other similar procedures (including procedures for persons with unlimited liability for the applicant's debts)
- in breach of social security or tax obligations (including if done by persons with unlimited liability for the applicant's debts)
- guilty of grave professional misconduct²⁰ (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- committed fraud, corruption, links to a criminal organisation, money laundering, terrorism-related crimes (including terrorism financing), child labour or human trafficking (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- shown significant deficiencies in complying with main obligations under an EU procurement contract, grant agreement, prize, expert contract, or similar (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- guilty of irregularities within the meaning of Article 1(2) of Regulation No [2988/95](#) (including if done by persons having powers of representation, decisionmaking- or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- created under a different jurisdiction with the intent to circumvent fiscal, social or other legal obligations in the country of origin or created another entity with this purpose (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant).

Applicants will also be refused if it turns out that²¹:

- during the award procedure they misrepresented information required as a condition for participating or failed to supply that information
- they were previously involved in the preparation of the call and this entails a distortion of competition that cannot be remedied otherwise (conflict of interest).

8. Evaluation and award procedure

The proposals will have to follow a **two-step evaluation procedure**.

¹⁹ See Articles 136 and 141 of EU Financial Regulation [2018/1046](#).

²⁰ Professional misconduct includes: violation of ethical standards of the profession, wrongful conduct with impact on professional credibility, false declarations/misrepresentation of information, participation in a cartel or other agreement distorting competition, violation of IPR, attempting to influence decision-making processes or obtain confidential information from public authorities to gain advantage.

²¹ See Article 141 EU Financial Regulation [2018/1046](#).

For all eligible applications, in the first step, there will be a pre-selection on the basis of the Relevance award criterion only. In the second step, the successful proposals will be assessed against the full set of award criteria.

An **evaluation committee** (possibly assisted by independent outside experts) will assess all applications. Proposals will first be checked for formal requirements (admissibility, and eligibility, see *sections 5 and 6*). Proposals found admissible and eligible will be evaluated (for each topic) against the operational capacity and award criteria (*see sections 7 and 9*) and then ranked according to their scores.

For proposals with the same score (within a topic or budget envelope) a **priority order** will be determined according to the following approach:

Successively for every group of *ex aequo* proposals, starting with the highest scored group, and continuing in descending order:

- 1) The *ex aequo* proposals within the same topic will be prioritised according to the scores they have been awarded for the award criterion 'Relevance'. When these scores are equal, priority will be based on their scores for the criterion 'Impact'. When these scores are equal, priority will be based on their scores for the criterion 'Quality'.
- 2) If this does not allow to determine the priority, a further prioritisation can be done by considering the overall project portfolio and the creation of positive synergies between projects, or other factors related to the objectives of the call..
- 3) After that, the remainder of the available call budget will be used to fund projects across the different topics in order to ensure a balanced spread of the geographical and thematic coverage and while respecting to the maximum possible extent the order of merit based on the evaluation of the award criteria.

All proposals will be informed about the evaluation result (**evaluation result letter**). Successful proposals will be invited for grant preparation; the other ones will be put on the reserve list or rejected.

 No commitment for funding — Invitation to grant preparation does NOT constitute a formal commitment for funding. We will still need to make various legal checks before grant award: *legal entity validation, financial capacity, exclusion check, etc.*

Grant preparation will involve a dialogue in order to fine-tune technical or financial aspects of the project and may require extra information from your side. It may also include adjustments to the proposal to address recommendations of the evaluation committee or other concerns. Compliance will be a pre-condition for signing the grant.

If you believe that the evaluation procedure was flawed, you can submit a **complaint** (following the deadlines and procedures set out in the evaluation result letter). Please note that notifications which have not been opened within 10 days after sending are considered to have been accessed and that deadlines will be counted from opening/access (*see also [Funding & Tenders Portal Terms and Conditions](#)*). Please also be aware that for complaints submitted electronically, there may be character limitations.

9. Award criteria

The **award criteria** for this call are as follows:

- **Relevance:** clarity and consistency of the objectives and scope of the project seen against the objectives and expected impact/outcomes (if applicable) as identified in section 2; contribution to the relevant EU strategic and documents and/or action plans and legislative context; previous results in the field; European/trans-national dimension (30 points)
- **Quality:** logical links between the identified problems, needs and solutions proposed; methodology for implementing the project (concept and methodology, timetable, monitoring and evaluation); expertise and quality of the consortium and project teams; management structures and procedures; risks and risk management; feasibility of the project within the proposed time frame; cost effectiveness and best value for money (50 points)
- **Impact:** expected short-term and long-term impact of results on target groups/general public; degree of ambition and innovation; appropriate communication strategy, including visibility of EU funding; appropriate dissemination strategy for ensuring sustainability and long-term impact; sustainability of results after EU funding ends; replicability/usability/potential for amplification of the results (20 points).

Award criteria	Minimum pass score	Maximum score
Relevance	21	30
Quality	n/a	50
Impact	n/a	20
Overall (pass) scores	70	100

Maximum points: 100 points.

Individual thresholds for the criterion 'Relevance': 21/30 points.

Overall threshold: 70 points.

Proposals that pass the individual threshold for the criterion 'Relevance' AND the overall threshold will be considered for funding — within the limits of the available call budget. Other proposals will be rejected.

10. Legal and financial set-up of the Grant Agreements

If you pass evaluation, your project will be invited for grant preparation, where you will be asked to prepare the Grant Agreement together with the EU Project Officer.

This Grant Agreement will set the framework for your grant and its terms and conditions, in particular concerning deliverables, reporting and payments.

The Model Grant Agreement that will be used (and all other relevant templates and guidance documents) can be found on [Portal Reference Documents](#).

Starting date and project duration

The project starting date and duration will be fixed in the Grant Agreement (*Data Sheet, point 1*). Normally the starting date will be after grant signature. Retroactive application can be granted exceptionally for duly justified reasons — but never earlier than the proposal submission date.

Project duration: 24 months (extensions are possible, if duly justified and through an amendment).

Milestones and deliverables

The milestones and deliverables for each project will be managed through the Portal Grant Management System and will be reflected in Annex 1 of the Grant Agreement.

The following deliverables will be mandatory for all projects:

- A mid-term progress report,
- A learning material about what constitutes terrorist content as defined by the TCO Regulation. This is a key element to ensure a coherent application of the requirements of the Regulation by the HSPs.

Form of grant, funding rate and maximum grant amount

The grant parameters (*maximum grant amount, funding rate, total eligible costs, etc*) will be fixed in the Grant Agreement (*Data Sheet, point 3 and art 5*).

Project budget (maximum grant amount): *see section 6 above*. The grant awarded may be lower than the amount requested.

The grant will be a budget-based mixed actual cost grant (actual costs, with unit cost and flat-rate elements). This means that it will reimburse ONLY certain types of costs (eligible costs) and costs that were *actually* incurred for your project (NOT the *budgeted* costs). For unit costs and flat-rates, you can charge the amounts calculated as explained in the Grant Agreement (*see art 6 and Annex 2 and 2a*).

The costs will be reimbursed at the funding rate fixed in the Grant Agreement (**90%**).

Grants may NOT produce a profit (i.e. surplus of revenues + EU grant over costs). For-profit organisations must declare their revenues and, if there is a profit, we will deduct it from the final grant amount (*see art 22.3*).

Moreover, please be aware that the final grant amount may be reduced in case of non-compliance with the Grant Agreement (e.g. *improper implementation, breach of obligations, etc*).

Budget categories and cost eligibility rules

The budget categories and cost eligibility rules are fixed in the Grant Agreement (*Data Sheet, point 3, art 6 and Annex 2*).

Budget categories for this call:

- A. Personnel costs
 - A.1 Employees, A.2 Natural persons under direct contract, A.3 Seconded persons
 - A.4 SME owners and natural person beneficiaries
 - A.5 Volunteers
- B. Subcontracting costs
- C. Purchase costs
 - C.1 Travel and subsistence
 - C.2 Equipment
 - C.3 Other goods, works and services

- D. Other cost categories (*not applicable*)
- E. Indirect costs

Specific cost eligibility conditions for this call:

- personnel costs:
 - SME owner/natural person unit cost²²: Yes
 - volunteers unit cost²³: Yes (without indirect costs)
- travel and subsistence unit cost²⁴: Yes
- equipment costs: depreciation
- other cost categories:
 - costs for financial support to third parties: not allowed.
- indirect cost flat-rate: 7% of the eligible direct costs (categories A-D, except volunteers costs and exempted specific cost categories, if any)
- VAT: non-deductible VAT is eligible (but please note that since 2013 VAT paid by beneficiaries that are public bodies acting as public authority is NOT eligible)
- divers:
 - in-kind contributions for free are allowed, but cost-neutral, i.e. cannot be declared as cost

 **Volunteers costs —** Volunteers costs are not a classic cost category. There are no costs because volunteers work for free, but they may nonetheless be added to the budget in the form of a pre-fixed unit cost (per volunteer) and thus allow you to benefit from the volunteers' work for the grant (by increasing the amount of reimbursement up to 100% of the normal costs, i.e. cost categories other than volunteers). More information is available in the [AGA — Annotated Grant Agreement, art 6.2.A.5](#).

Reporting and payment arrangements

The reporting and payment arrangements are fixed in the Grant Agreement (*Data Sheet, point 4 and art 21 and 22*).

After grant signature, you will normally receive a **prefinancing** to start working on the project (float of normally **80%** of the maximum grant amount; exceptionally less or no prefinancing). The prefinancing will be paid 30 days from entry into force/financial guarantee (if required) — whichever is the latest.

There will be no **interim payments**.

In addition, you will be expected to submit one or more progress reports not linked to payments.

²² Commission [Decision](#) of 20 October 2020 authorising the use of unit costs for the personnel costs of the owners of small and medium-sized enterprises and beneficiaries that are natural persons not receiving a salary for the work carried out by themselves under an action or work programme (C(2020)7715).

²³ Commission [Decision](#) of 10 April 2019 authorising the use of unit costs for declaring personnel costs for the work carried out by volunteers under an action or a work programme (C(2019)2646).

²⁴ Commission [Decision](#) of 12 January 2021 authorising the use of unit costs for travel, accommodation and subsistence costs under an action or work programme under the 2021-2027 multi-annual financial framework (C(2021)35).

Payment of the balance: At the end of the project, we will calculate your final grant amount. If the total of earlier payments is higher than the final grant amount, we will ask you (your coordinator) to pay back the difference (recovery).

All payments will be made to the coordinator.

 Please be aware that payments will be automatically lowered if one of your consortium members has outstanding debts towards the EU (granting authority or other EU bodies). Such debts will be offset by us — in line with the conditions set out in the Grant Agreement (see art 22).

Please also note that you are responsible for keeping records on all the work done and the costs declared.

Prefinancing guarantees

If a prefinancing guarantee is required, it will be fixed in the Grant Agreement (*Data Sheet, point 4*). The amount will be set during grant preparation and it will normally be equal or lower than the prefinancing for your grant.

The guarantee should be in euro and issued by an approved bank/financial institution established in an EU Member State. If you are established in a non-EU country and would like to provide a guarantee from a bank/financial institution in your country, please contact us (this may be exceptionally accepted, if it offers equivalent security).

Amounts blocked in bank accounts will NOT be accepted as financial guarantees.

Prefinancing guarantees are formally NOT linked to individual consortium members, which means that you are free to organise how to provide the guarantee amount (*by one or several beneficiaries, for the overall amount or several guarantees for partial amounts, by the beneficiary concerned or by another beneficiary, etc*). It is however important that the requested amount is covered and that the guarantee(s) are sent to us in time to make the prefinancing (scanned copy via Portal AND original by post).

If agreed with us, the bank guarantee may be replaced by a guarantee from a third party.

The guarantee will be released at the end of the grant, in accordance with the conditions laid down in the Grant Agreement.

Certificates

Depending on the type of action, size of grant amount and type of beneficiaries, you may be requested to submit different certificates. The types, schedules and thresholds for each certificate are fixed in the Grant Agreement (*Data Sheet, point 4 and art 24*).

Liability regime for recoveries

The liability regime for recoveries will be fixed in the Grant Agreement (*Data Sheet point 4.4 and art 22*).

For beneficiaries, it is limited joint and several liability with individual ceilings — *each beneficiary up to their maximum grant amount*.

In addition, the granting authority may require joint and several liability of affiliated entities (with their beneficiary).

Provisions concerning the project implementation

Security rules: see *Model Grant Agreement (art 13 and Annex 5)*

Ethics rules: see *Model Grant Agreement* (art 14 and Annex 5)

IPR rules: see *Model Grant Agreement* (art 16 and Annex 5):

- rights of use on results: Yes

Communication, dissemination and visibility of funding: see *Model Grant Agreement* (art 17 and Annex 5):

- additional communication and dissemination activities: Yes
- limited communication and visibility to protect persons involved: No

Specific rules for carrying out the action: see *Model Grant Agreement* (art 18 and Annex 5):

- EU restrictive measures: Yes
- durability: No
- specific rules for humanitarian actions: No
- specific rules for blending operations: No
- Other specificities

n/a

Non-compliance and breach of contract

The Grant Agreement (chapter 5) provides for the measures we may take in case of breach of contract (and other non-compliance issues).



For more information, see [*AGA – Annotated Grant Agreement*](#).

11. How to submit an application

All proposals must be submitted directly online via the Funding & Tenders Portal Electronic Submission System. Paper applications are NOT accepted.

Submission is a **2-step process**:

a) create a user account and register your organisation

To use the Submission System (the only way to apply), all participants need to [create an EU Login user account](#).

Once you have an EULogin account, you can [register your organisation](#) in the Participant Register. When your registration is finalised, you will receive a 9-digit participant identification code (PIC).

b) submit the proposal

Access the Electronic Submission System via the Topic page in the [Search Funding & Tenders](#) section (or, for calls sent by invitation to submit a proposal, through the link provided in the invitation letter).

Submit your proposal in 3 parts, as follows:

- Part A includes administrative information about the applicant organisations (future coordinator, beneficiaries, affiliated entities and associated partners) and the summarised budget for the proposal. Fill it in directly online
- Part B (description of the action) covers the technical content of the proposal. Download the mandatory word template from the Submission System, fill it in and upload it as a PDF file
- Annexes (*see section 5*). Upload them as PDF file (single or multiple depending on the slots). Excel upload is sometimes possible, depending on the file type.

The proposal must keep to the **page limits** (*see section 5*); excess pages will be disregarded.

Documents must be uploaded to the **right category** in the Submission System otherwise the proposal might be considered incomplete and thus inadmissible.

The proposal must be submitted **before the call deadline** (*see section 4*). After this deadline, the system is closed and proposals can no longer be submitted.

Once the proposal is submitted, you will receive a **confirmation e-mail** (with date and time of your application). If you do not receive this confirmation e-mail, it means your proposal has NOT been submitted. If you believe this is due to a fault in the Submission System, you should immediately file a complaint via the [IT Helpdesk webform](#), explaining the circumstances and attaching a copy of the proposal (and, if possible, screenshots to show what happened).

Details on processes and procedures are described in the [Online Manual](#). The Online Manual also contains the links to FAQs and detailed instructions regarding the Portal Electronic Exchange System.

12. Help

As far as possible, ***please try to find the answers you need yourself***, in this and the other documentation (we have limited resources for handling direct enquiries):

- [Online Manual](#)
- FAQs on the Topic page (for call-specific questions)
- [Portal FAQ](#) (for general questions).

Questions **received later than 7 calendar days before the deadline** for submitting applications will not be answered. In the interest of equal treatment of applicants, the Commission cannot give a prior opinion on the eligibility of applicants or actions.

Please also consult the Topic page regularly, since we will use it to publish call updates.

Contact

For individual questions on the Portal Submission System, please contact the [IT Helpdesk](#).

Non-IT related questions should be sent to the following email address: HOME-ISF@ec.europa.eu.

Please indicate clearly the reference of the call and topic to which your question relates (*see cover page*).

13. Important



IMPORTANT

- **Don't wait until the end** — Complete your application sufficiently in advance of the deadline to avoid any last minute **technical problems**. Problems due to last minute submissions (*e.g. congestion, etc*) will be entirely at your risk. Call deadlines can NOT be extended.
- **Consult** the Portal Topic page regularly. We will use it to publish updates and additional information on the call (call and topic updates).
- **Funding & Tenders Portal Electronic Exchange System** — By submitting the application, all participants **accept** to use the electronic exchange system in accordance with the [Portal Terms & Conditions](#).
- **Registration** — Before submitting the application, all beneficiaries, affiliated entities and associated partners must be registered in the [Participant Register](#). The participant identification code (PIC) (one per participant) is mandatory for the Application Form.
- **Consortium roles** — When setting up your consortium, you should think of organisations that help you reach objectives and solve problems.
The roles should be attributed according to the level of participation in the project. Main participants should participate as **beneficiaries** or **affiliated entities**; other entities can participate as associated partners, subcontractors, third parties giving in-kind contributions. **Associated partners** and third parties giving in-kind contributions should bear their own costs (they will not become formal recipients of EU funding). **Subcontracting** should normally constitute a limited part and must be performed by third parties (not by one of the beneficiaries/affiliated entities). Subcontracting going beyond 30% of the total eligible costs must be justified in the application.
- **Coordinator** — In multi-beneficiary grants, the beneficiaries participate as consortium (group of beneficiaries). They will have to choose a coordinator, who will take care of the project management and coordination and will represent the consortium towards the granting authority. In mono-beneficiary grants, the single beneficiary will automatically be coordinator.
- **Affiliated entities** — Applicants may participate with affiliated entities (*i.e.* entities linked to a beneficiary which participate in the action with similar rights and obligations as the beneficiaries, but do not sign the grant and therefore do not become beneficiaries themselves). They will get a part of the grant money and must therefore comply with all the call conditions and be validated (just like beneficiaries); but they do not count towards the minimum eligibility criteria for consortium composition (if any).
- **Associated partners** — Applicants may participate with associated partners (*i.e.* partner organisations which participate in the action but without the right to get grant money). They participate without funding and therefore do not need to be validated.
- **Consortium agreement** — For practical and legal reasons it is recommended to set up internal arrangements that allow you to deal with exceptional or unforeseen circumstances (in all cases, even if not mandatory under the Grant Agreement). The consortium agreement also gives you the possibility to redistribute the grant money according to your own consortium-internal principles and parameters (for instance, one beneficiary can reattribute its grant money to another beneficiary). The consortium agreement thus allows you to customise the EU grant to the needs inside your consortium and can also help to protect you in case of disputes.

- **Balanced project budget** — Grant applications must ensure a balanced project budget and sufficient other resources to implement the project successfully (e.g. *own contributions, income generated by the action, financial contributions from third parties, etc*). You may be requested to lower your estimated costs, if they are ineligible (including excessive).
- **No-profit rule** — Grants may NOT give a profit (i.e. surplus of revenues + EU grant over costs). This will be checked by us at the end of the project.
- **No double funding** — There is a strict prohibition of double funding from the EU budget (except under EU Synergies actions). Outside such Synergies actions, any given action may receive only ONE grant from the EU budget and cost items may under NO circumstances declared to two different EU actions.
- **Completed/ongoing projects** — Proposals for projects that have already been completed will be rejected; proposals for projects that have already started will be assessed on a case-by-case basis (in this case, no costs can be reimbursed for activities that took place before the project starting date/proposal submission).
- **Combination with EU operating grants** — Combination with EU operating grants is possible, if the project remains outside the operating grant work programme and you make sure that cost items are clearly separated in your accounting and NOT declared twice (see [AGA – Annotated Model Grant Agreement, art 6.2.E](#)).
- **Multiple proposals** — Applicants may submit more than one proposal for *different* projects under the same call (and be awarded a funding for them).
Organisations may participate in several proposals.
BUT: if there are several proposals for *very similar* projects, only one application will be accepted and evaluated; the applicants will be asked to withdraw one of them (or it will be rejected).
- **Resubmission** — Proposals may be changed and re-submitted until the deadline for submission.
- **Rejection** — By submitting the application, all applicants accept the call conditions set out in this this Call Document (and the documents it refers to). Proposals that do not comply with all the call conditions will be **rejected**. This applies also to applicants: All applicants need to fulfil the criteria; if any one of them doesn't, they must be replaced or the entire proposal will be rejected.
- **Cancellation** — There may be circumstances which may require the cancellation of the call. In this case, you will be informed via a call or topic update. Please note that cancellations are without entitlement to compensation.
- **Language** — You can submit your proposal in any official EU language (project abstract/summary should however always be in English). For reasons of efficiency, we strongly advise you to use English for the entire application. If you need the call documentation in another official EU language, please submit a request within 10 days after call publication (for the contact information, see section 12).

- **Transparency** — In accordance with Article 38 of the [EU Financial Regulation](#), information about EU grants awarded is published each year on the [Europa website](#).

This includes:

- beneficiary names
- beneficiary addresses
- the purpose for which the grant was awarded
- the maximum amount awarded.

The publication can exceptionally be waived (on reasoned and duly substantiated request), if there is a risk that the disclosure could jeopardise your rights and freedoms under the EU Charter of Fundamental Rights or harm your commercial interests.

- **Data protection** — The submission of a proposal under this call involves the collection, use and processing of personal data. This data will be processed in accordance with the applicable legal framework. It will be processed solely for the purpose of evaluating your proposal, subsequent management of your grant and, if needed, programme monitoring, evaluation and communication. Details are explained in the [Funding & Tenders Portal Privacy Statement](#).