



Internal Security Fund – Police

Call for proposals

Cybercrime, child sexual abuse and digital investigations

ISFP-2020-AG-CYBER

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INTERNAL SECURITY FUND POLICE (2014-2020)

2020 CALL FOR PROPOSALS

ISFP-2020-AG-CYBER

Cybercrime, child sexual abuse and digital investigations

1. INTRODUCTION

The present Call for Proposals aims at funding projects on fighting cybercrime, child sexual abuse and including digital investigations.

In July 2020, the European Commission adopted:

- A new EU Security Union Strategy,¹ defining the priority actions that the Commission intends to pursue in the area of internal security at large and specifically also in the area of cybercrime [see Strategic Priority 2 “Tackling evolving threats”
- A new EU strategy for a more effective fight against child sexual abuse,² which sets out a comprehensive response to the growing threat of child sexual abuse both offline and online, by improving prevention, investigation, and assistance to victims.

In the past years, a number of measures have been put into place to contribute to the European fight against cybercrime and child sexual abuse:

- A Directive on combating child sexual abuse and exploitation,³: Member States can benefit from EU financial support to fully achieve the objectives laid down in the Directive of improving investigations and prosecutions of these crimes, prevention, and assistance to victims.
- A Directive on attacks against information systems,⁴ which harmonizes the criminal law of Member States and facilitate cooperation between law enforcement authorities, among others by establishing 24/7 Points of Contact.
- Directive on combating fraud and counterfeiting of non-cash means of payment,⁵ which harmonizes the criminal law of Member States, facilitates

¹ COM(2020) 605 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0605>

² COM(2020) 607 final

³ Directive 2011/93/EU of 13 December 2011 on combating the sexual abuse and sexual exploitation of children and child pornography, and replacing Council Framework Decision 2004/68/JHA, L 335/1 of 17 December 2011.

⁴ Directive 2013/40/EU of 12 August 2013 on attacks against information systems and replacing Council Framework Decision 2005/222/JHA, L 218/8 of 14 August 2013.

cooperation between law enforcement authorities and aims at enhancing reporting, prevention and victims' assistance.

The Cybersecurity Strategy for the European Union⁶, adopted in February 2013, has set out necessary steps to ensure cybersecurity and more effectively fight cybercrime. Building on the Cybersecurity Strategy, the Communication "Resilience, Deterrence and Defence: Building strong cybersecurity for the EU"⁷, adopted in 2017, outlines the priorities at EU level that the European Commission intends to pursue to fight cybercrime.

Furthermore, the Commission launched the European Cybercrime Centre (EC3) at Europol in early 2013. The EC3 is becoming a focal point for cybercrime-related issues and has been cooperating with Member States and third States on a number of very successful investigations.

In conformity with Regulation (EU) No 514/2014 Article 6.2, in order to implement the ISF Police, the Commission has adopted on 27 July 2020 the 2020 work programme for Union actions⁸, which includes this Call for Proposals.

2. PRIORITIES OF THIS CALL FOR PROPOSALS

Project applications submitted under the present call for proposals must address at least one of the following priorities in the areas of cybercrime (including fraud and counterfeiting of non-cash means of payment) and child sexual abuse and exploitation (with specific focus on actions implementing priorities identified under the EU strategy for a more effective fight against child sexual abuse⁹):

1. Developing capacity and expertise of law enforcement and judicial authorities and supporting cross-border cooperation. This includes, for instance, the development of investigative and forensics tools to address the challenges posed by the use of encryption by criminals and its impact on criminal investigations and supporting law enforcement authorities' engagement in the area of Internet governance;

2. Contributing to the implementation of EU law, taking in account in particular the available assessments:

- For Directive 2011/93/EU of 13 December 2011 on combating the sexual abuse and sexual exploitation of children and child pornography, see in particular (a) the Report assessing the extent to which the Member States have taken the necessary measures in order to comply with Directive 2011/93/EU of 13 December 2011 on combating the sexual abuse and sexual exploitation of children and child pornography¹⁰ and (b) the Report assessing the implementation of the measures referred to in Article 25 of Directive 2011/93/EU of 13 December 2011 on combating the sexual abuse and sexual exploitation of children and child pornography¹¹

⁵ Directive (EU) 2019/713 of the European Parliament and of the Council of 17 April 2019 on combating fraud and counterfeiting of non-cash means of payment and replacing Council Framework Decision 2001/413/JHA.

⁶ JOIN (2013) 1 final

⁷ JOIN (2017) 450 final

⁸ C(2020) 4966

⁹ COM(2020) 607 final

¹⁰ COM/2016/0871 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52016DC0871>

¹¹ COM/2016/0872 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52016DC0871>

- For Directive 2013/40/EU of 12 August 2013 on attacks against information systems, see in particular the Report assessing the extent to which the Member States have taken the necessary measures in order to comply with Directive 2013/40/EU on attacks against information systems and replacing Council Framework Decision 2005/222/JHA¹²
- For Directive (EU) 2019/713 of 17 April 2019 on combating fraud and counterfeiting of non-cash means of payment, see in particular the Impact Assessment accompanying the Commission proposal¹³

3. Fostering cross-border cooperation between law enforcement/judicial authorities and private entities. This includes, for instance, the establishment of mechanisms supporting public-private cooperation and mechanisms to enhance reporting of crime to law enforcement authorities.

Projects should build on scientific material available in the domain and in particular exploit, where possible, publicly available material resulting from relevant projects supported by the European Commission (e.g. under the Horizon 2020, ISEC programme and Safer Internet Programme) as well as from any other relevant project. Applications should demonstrate that projects do not duplicate existing work or products and include evidence of user needs. The tools developed under this priority shall be made available for their use to law enforcement authorities, as well as to the European Cybercrime Centre at Europol, at little or no cost. Law enforcement authorities should be involved in the full development cycle of the project deliverables. The applications should clearly demonstrate how this will be implemented.

Proposals which match most closely these priorities will be evaluated as particularly relevant and will have a higher chance of being selected. Applicants are therefore invited to consider very carefully the links between their proposal and the priorities of the call.

Projects must be aiming to achieve one or more of the following outcomes:

- Increasing and enhancing reporting of cybercrime to law enforcement authorities
- Providing public authorities with an accurate picture of the real (i.e. included unreported) extent of cybercrime.
- Enhancing the capacity of law enforcement and/or judicial authorities to investigate cyber-attacks and cyber enabled crime, for instance through investigative techniques and tools (including for digital forensics) with a focus on top threat priorities as presented in EUROPOL's Internet Organised Crime Threat Assessment 2019¹⁴.
- Enhancing the capacity of law enforcement to support victims during investigations
- Enhancing the capacity of law enforcement and/or judicial authorities to address the challenges posed by the use of encryption by criminals and its impact on criminal investigations, for instance by supporting the establishment, extension and development of points of expertise and their networking at EU level or supporting the development of a toolbox of alternative investigation techniques to obtain needed information encrypted by criminals (with the exclusion of measures that could weaken encryption in general or could have an impact on a larger or indiscriminate number of people)
- Enhancing the capacity of law enforcement and/or judicial authorities to cooperate across borders, for instance supporting the gathering and provision of digital evidence, supporting the secondment of officials, improving the efficiency of 24/7 (permanent) law enforcement contact points for cybercrime, establishment of dedicated platforms
- Enhancing the cooperation between private entities and law enforcement and/or judicial authorities, for the purpose of detecting, reporting, investigating and preventing crime and taking remedial action

¹² COM/2017/0474 final, <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:52017DC0474>

¹³ SWD(2017) 298 final, <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2017:0298:FIN:EN:PDF>

¹⁴ https://www.europol.europa.eu/sites/default/files/documents/iocta_2019.pdf

- Increasing the accountability of registrars of domain names and ensuring accuracy of information on website ownership
- Contributing to the implementation of the EU strategy for a more effective fight against child sexual abuse, in particular but not limited to:
 - Prevention initiatives to reduce the incidence of child sexual abuse online and offline, and in particular on programmes for offenders and people who fear that they might offend.
 - Initiatives to improve the detection, removal and reporting of online child sexual abuse
 - Initiatives to improve the accuracy and effectiveness of the identification of victims of child sexual abuse, and other initiatives to support victims of child sexual abuse and exploitation.

Where applicable the proposals should demonstrate how they will effectively build on the relevant previous or on-going EU funded projects, including but not limited to, under the Horizon 2020. Proposals that strengthen and clearly links with actions led in the context of the EU Policy Cycle to tackle Organized and Serious International Crime e.g. through capacity building activities are also welcomed.

In addition to the regular dissemination activities of the projects' outcomes, the Directorate-General for Migration and Home Affairs (DG HOME) would like to encourage more dialogue among the individual project beneficiaries and between the community of project beneficiaries, stakeholders, relevant networks of practitioners, Europol's innovation Lab and the Commission services. The aim is in particular to promote more interaction about innovation in project outputs and to increase visibility, learning effects and synergies. Moreover, DG HOME invites applicants to reflect on how to reinforce the communication, dissemination and visibility of the contents of their projects (outputs and outcomes). Applicants are therefore encouraged to earmark budget for networking activities in Brussels, as well as dissemination products supporting DG HOME's communications efforts, such as factsheets, and to plan accordingly.

Any action under this call for proposals shall respect and shall be implemented in line with the rights and principles enshrined in the Charter of Fundamental Rights of the European Union. Applications should pay appropriate attention to the effects of the project on individual rights and freedoms, as well as to possible remedies. In addition, any action under this call for proposals should comply with all relevant ethical principles and all applicable international, EU and national law on ethical issues while carrying out the project.

3. TIMETABLE

	Stages	Date and time or indicative period
a)	Publication of the call	22/10/2020
b)	Deadline for submitting applications	25/02/2021 - 17:00 (Brussels Time)
c)	Evaluation period	February 2021 - June 2021
d)	Information to applicants	June 2021
e)	Signature of grant agreement	July 2021
f)	Provisional starting date of the action	August 2021

4. BUDGET AVAILABLE

The total budget earmarked for the co-financing of projects under this call for proposals is estimated at EUR 9 000 000 (nine million euros).

The Commission reserves the right not to distribute all the funds available.

5. ELIGIBILITY CRITERIA

5.1. General provisions (admissibility)

Applications must be:

- sent no later than the deadline for submitting applications referred to in section 3;
- submitted using the Electronic Submission System of the Funding and Tender Opportunities Portal¹⁵;
- submitted using the standard Submission Form Part A and Part B of the respective call for proposals. The template for Part B shall not be customised, i.e. keep all its foreseen sections (even if not relevant for your proposal), and without deleting instructions or changing the font. They must include all the mandatory information and be accompanied (if applicable¹⁶) by the audit report annexes;
- drafted in one of the EU official languages. English is preferred in order to speed up the evaluation procedure.

Failure to comply with these requirements will lead to the rejection of the application.

5.2. Eligibility criteria

5.2.1. *Eligibility of the applicants and co-applicants*

All the applicants and co-applicants must fulfil the following eligibility requirements for applications to be eligible. To prove these eligibility requirements, applicants and co-applicants will have to provide the relevant information and upload necessary documents showing their legal status in the Participant Register.

a) Legal Status

The following entities can apply as lead applicants and co-applicants:

- public bodies;
- non-profit-making private entities;
- international organisations¹⁷;

The following entities can only apply as co-applicants:

- profit making entities;

¹⁵ <https://ec.europa.eu/info/funding-tenders/>

¹⁶ See section 7.1

¹⁷ The term "international organisations" is used in this call for proposals as defined in Article 156 of the FR (Euratom 2018/1046);

- (a) international public-sector organisations set up by intergovernmental agreements, and specialised agencies set up by such organisations;
- (b) the International Committee of the Red Cross;
- (c) the International Federation of National Red Cross and Red Crescent Societies;
- (d) other non-profit organisations assimilated to international organisations by a Commission decision.

- entities established in a third country

The following are not eligible, neither as applicants nor as co-applicants:

- Union Agencies
- natural persons

Affiliated entities, i.e. legal entities having a legal or capital link with applicants, shall take part in the action as individual co-applicants in order to declare eligible costs unless they are affiliated to a public body.

b) Country of establishment

With the exception of international organisations, applicants and co-applicants must be established in the following countries to be eligible:

- the Member States of the European Union, with the exception of Denmark (“Member States participating in the ISF Police instrument/Justice programme”);
- any other third country/ies¹⁸,

International organisations can be established outside the above-mentioned countries.

The lead applicant must be established in a Member States participating in the ISF Police instrument.

For UK applicants: Please note that the United Kingdom is not bound by Regulation (EU) No. 513/2014 establishing the ISF Police instrument and its implementing decisions and UK entities are therefore not eligible to participate under this call.]

5.2.2. Eligibility of the application

In order to be eligible, applications:

- must be transnational, i.e. involve at least two eligible entities established in two different Member States participating in the ISF Police instrument¹⁹.
- must request an EU contribution equal to or higher than EUR 300,000 and equal to or lower than EUR 4,000,000. Applications seeking lower or higher EU contributions will be rejected.
- must have an implementation period of maximum 36 months²⁰. Applications for projects scheduled to run for a longer period will be rejected. Activities must not have started prior to the date of submission of the grant application.

5.3. Eligible activities

The following types of activities are eligible under this call for proposals

- analytical, monitoring and evaluation activities, including threat, risk and impact assessments, which are evidence based and consistent with priorities and initiatives identified at Union level, in particular those that have been endorsed by the

¹⁸ A third country is a country, which is not an EU Member State. The United Kingdom and Denmark cannot be considered as third countries.

¹⁹ In case the co-applicant is an international organisation established in an EU Member State (participating in the ISF Police instrument) the other co-applicant(s) needs to be established in a different EU Member State (participating in the ISF Police instrument) than the international organisation. In case the co-applicant is an international organisation established outside the EU, at least two other co-applicants established in two different EU Member States (participating in the ISF Police instrument) are required.

²⁰ The project duration may be extended during its implementation for duly justified reasons subject to the Commission's approval via an amendment to the grant agreement.

European Parliament and the Council and projects monitoring the implementation of Union law and Union policy objectives in the Member States;

- b) activities promoting networking, public-private partnerships, mutual confidence, understanding and learning, identification and dissemination of good practices and innovative approaches at Union level, training and exchange programmes as well as organisation of seminars and workshops;
- c) the acquisition, maintenance and/or further upgrading of technical equipment, expertise, secure facilities, infrastructures, related buildings and systems, especially ICT systems and their components at the Union level, including for the purpose of European cooperation on cyber security and cybercrime, notably the European Cybercrime Centre;
- d) particularly innovative activities developing new methods and/or deploying new technologies with a potential for transferability to other Member States, especially projects aiming at testing and validating the outcome of Union funded security research projects;
- e) studies;
- f) management of the project and evaluation of activities.

6. EXCLUSION CRITERIA

Applicants will be excluded from participating in the call for proposals procedure and from the grant award if they are in any of the exclusion situations referred to in article 136(1) of the EU Financial Regulation²¹, i.e. one of the following situations:

6.1. Exclusion from participation in the call for proposals

- (a) the applicant is bankrupt, subject to insolvency or winding-up procedures, its assets are being administered by a liquidator or by a court, it is in an arrangement with creditors, its business activities are suspended, or it is in any analogous situation arising from a similar procedure provided for under EU or national laws or regulations;
- (b) it has been established by a final judgment or a final administrative decision that the applicant is in breach of its obligations relating to the payment of taxes or social security contributions in accordance with the applicable law;
- (c) it has been established by a final judgment or a final administrative decision that the applicant is guilty of grave professional misconduct by having violated applicable laws or regulations or ethical standards of the profession to which the applicant belongs, or by having engaged in any wrongful intent or gross negligence, including, in particular, any of the following:
 - (i) fraudulently or negligently misrepresenting information required for the verification of the absence of grounds for exclusion or the fulfilment of eligibility or selection criteria or in the performance of a contract, a grant agreement or a grant decision;
 - (ii) entering into agreement with other applicants with the aim of distorting competition;
 - (iii) violating intellectual property rights;
 - (iv) attempting to influence the decision-making process of the Commission during the award procedure;

²¹ Regulation (EU, EURATOM) 2018/1046 of the European Parliament and of the Council of 30 July 2018 on the financial rules applicable to the general budget of the Union (OJ 2018 L193, p. 1).

- (v) attempting to obtain confidential information that may confer upon it undue advantages in the award procedure;
- (d) it has been established by a final judgment that the applicant is guilty of any of the following:
- (i) fraud, within the meaning of Article 3 of Directive (EU) 2017/1371 of the European Parliament and of the Council and Article 1 of the Convention on the protection of the European Communities' financial interests, drawn up by the Council Act of 26 July 1995;
 - (ii) corruption, as defined in Article 4(2) of Directive (EU) 2017/1371 or Article 3 of the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union, drawn up by the Council Act of 26 May 1997, or conduct referred to in Article 2(1) of Council Framework Decision 2003/568/JHA, or corruption as defined in the applicable law;
 - (iii) conduct related to a criminal organisation, as referred to in Article 2 of Council Framework Decision 2008/841/JHA;
 - (iv) money laundering or terrorist financing within the meaning of Article 1(3), (4) and (5) of Directive (EU) 2015/849 of the European Parliament and of the Council;
 - (v) terrorist offences or offences linked to terrorist activities, as defined in Articles 1 and 3 of Council Framework Decision 2002/475/JHA, respectively, or inciting, aiding, abetting or attempting to commit such offences, as referred to in Article 4 of that Decision;
 - (vi) child labour or other offences concerning trafficking in human beings as referred to in Article 2 of Directive 2011/36/EU of the European Parliament and of the Council;
- (e) the applicant has shown significant deficiencies in complying with main obligations in the performance of a contract, a grant agreement or a grant decision financed by the Union's budget, which has led to its early termination or to the application of liquidated damages or other contractual penalties, or which has been discovered following checks, audits or investigations by an authorising officer, OLAF or the Court of Auditors;
- (f) it has been established by a final judgment or final administrative decision that the applicant has committed an irregularity within the meaning of Article 1(2) of Council Regulation (EC, Euratom) No 2988/95;
- (g) it has been established by a final judgement or final administrative decision that the applicant has created an entity in a different jurisdiction with the intent to circumvent fiscal, social or any other legal obligations of mandatory application in the jurisdiction of its registered office, central administration or principal place of business;
- (h) it has been established by a final judgement or final administrative decision that an entity has been created with the intent referred to in point (g);
- (i) for the situations referred to in points (c) to (h) above, the applicant is subject to:
- (i) facts established in the context of audits or investigations carried out by European Public Prosecutor's Office after its establishment, the Court of Auditors, the European Anti-Fraud Office or the internal auditor, or any other check, audit or control performed under the responsibility of an authorising officer of an EU institution, of a European office or of an EU agency or body;
 - (ii) non-final judgments or non-final administrative decisions which may include disciplinary measures taken by the competent supervisory body responsible for the verification of the application of standards of professional ethics;
 - (iii) facts referred to in decisions of persons or entities being entrusted with EU budget implementation tasks;

- (iv) information transmitted by Member States implementing Union funds;
- (v) decisions of the Commission relating to the infringement of Union competition law or of a national competent authority relating to the infringement of Union or national competition law; or
- (vi) decisions of exclusion by an authorising officer of an EU institution, of a European office or of an EU agency or body.

6.2. Exclusion from award

Applicants will not be granted financial assistance if, in the course of the grant award procedure, they:

- (a) are subject to a conflict of interest in connection with the action;
- (b) are guilty of misrepresentation in supplying the information required by the Commission as a condition of participation in the grant award procedure or fail to supply this information;
- (c) find themselves in one of the situations of exclusion, referred to in section 6.1.

Administrative and financial penalties may be imposed on applicants and co-applicants who are guilty of misrepresentation.

7. SELECTION CRITERIA

7.1. Financial capacity

Applicants and co-applicants must have stable and sufficient sources of funding to maintain their activity throughout the duration of the grant and to participate in its funding. Organisations participating in several projects shall have sufficient financial capacity to implement multiple projects.

Financial capacity checks will be performed for all applicants and co-applicants in line with the requirements of Financial Regulation 2018/1046.

The documents that will be requested when assessing the financial capacity include (1) the profit and loss accounts and (2) the balance sheets. For newly created entities a business plan may replace the above documents.

In case of low financial capacity, the Commission may decide the following:

- request further documents;
- request budget modifications / reallocations of costs;
- introduce interim payments based on interim reports;
- modify pre-financing percentage.

In case of insufficient financial capacity, the Commission may decide the following:

- request a change of co-applicant;
- reject the application.

A financial capacity assessment **will not be carried out** if:

- the applicant or co-applicant is a public body or an international organisation;
- the EU contribution requested by the applicant or co-applicant is \leq EUR 60 000.

If the share of a grant requested by an organisation (applicant or co-applicant) exceeds EUR 750 000, this organisation must also provide an audit report produced by an approved external auditor certifying its accounts for the last closed financial year. **This provision shall not apply to public bodies or to international organisations.**

7.2. Operational capacity

Applicants and co-applicants must have the professional competencies as well as appropriate qualifications necessary to complete the proposed action. The purpose of the verification is to assess whether applicants and co-applicants possess the resources they require to implement the action.

As evidence, the following information must be provided in the Submission Form Part B of the proposal:

- general profiles (qualifications and experiences) of the staff primarily responsible for managing and implementing the proposed action, to be provided under point 5.1.4,
- a description of the partnership in the context of the proposed action, to be provided under point 5.1.1.

The operational capacity assessment is not applicable for public bodies and international organisations.

8. AWARD CRITERIA

Eligible applications and their proposed action will be assessed on the basis of the following award criteria:

Award Criteria	Maximum Points	Threshold
1. Relevance	30	21
2. Quality of the project	20	-
3. Cost effectiveness	20	-
4. European added value	20	-
5. Expected results, dissemination, sustainability and long-term impact	10	-
TOTAL	100	65

Evaluation Step 1:

- Relevance: applications will be assessed on the extent to which they match the priorities and expected outcomes as identified in this call for proposals (section 2 above) and in the relevant EU strategic documents and/or action plans (section 1 above), and on the extent to which the proposal address a real/actual need at European level in the prioritised areas. (30 points).

Applications receiving less than 21 points for the "relevance" criterion will not be evaluated further, i.e. will not go to the second evaluation step.

Evaluation Step 2:

- Quality of the project: applications will be assessed with regards to the clarity of their objectives; the appropriateness of their methodology; the quality of their expected outputs, which must be clear, appropriate, realistic and replicable; the quality of the consortium, which must have relevant co-applicants with clear roles and added value; the robustness of the project management, monitoring and evaluation strategy and indicators; and the way risks are identified and mitigated (20 points);

- Cost-effectiveness: applications will be assessed with regards to whether the costs of the proposed action are adequate to the activities and proportionate to the expected results (best value for money) (20 points);
- European added value: the project activities, outcomes and impact should have a broad EU relevance; applications will be assessed on whether a suitable number of countries is involved in the project activities and on whether the expected impact will concern a significant number of countries (20 points);
- Expected results, dissemination, sustainability and long-term impact: the expected results are appropriate for the achievement of the objectives of the action; the dissemination strategy is clear, targeted and appropriate; the project is sustainable; the project's results ensure a long-term impact on the target groups and/or general public (10 points).

Applications that pass the threshold of minimum 65 points will be considered for funding within the limits of the available budget.

9. LEGAL COMMITMENTS

The award of each grant is subject to the conclusion of a grant agreement in writing.

The coordinators of projects selected for funding will be invited to engage in a grant agreement preparation process, which will be carried out via an online IT system (SYGMA). If successful, it will conclude with the signature of a grant agreement, drawn up in euro and detailing the conditions and level of funding.

The grant agreement must be signed electronically first by the coordinator on behalf of the consortium and then by the European Commission. All co-beneficiaries must accede to the grant agreement by signing electronically the accession form to the grant.

Please note, that if international organisations are involved in the application, no other specific clauses applicable to international organisations than the ones already included in the Model grant agreement will be added.

Please note that the award of a grant does not establish any entitlement for subsequent years.

10. FINANCIAL PROVISIONS

10.1. General Principles

a) Non-cumulative award

An action may only receive one grant from the EU budget.

In no circumstances shall the same costs be financed twice by the Union budget. To ensure this, applicants shall indicate the sources and amounts of Union funding received or applied for the same action or part of the action or for its functioning during the same financial year as well as any other funding received or applied for the same action (Submission Form Part B, section 6).

b) Non-retroactivity

No grant may be awarded retrospectively for actions already completed. A grant may be awarded for an action which has already begun only where the applicant can demonstrate the need to start the action before the grant agreement is signed. In any case, costs eligible for financing may not have been incurred prior to the date of submission of the grant application.

c) Co-financing

Co-financing means that the resources which are necessary to carry out the action may not be entirely provided by the EU grant.

Co-financing of the action may take the form of:

- the Beneficiary's own resources,
- income generated by the action,
- financial contributions from third parties.

d) Balanced budget

The budget estimate of the action is to be included in the application form. It must have revenue and expenditure in balance and must be drawn up in euro.

Beneficiaries with general accounts in a currency other than the euro shall convert costs incurred in another currency into euro at the average of the daily exchange rates published in the C series of the Official Journal of the European Union, determined over the corresponding reporting period.²² Where no daily euro exchange rate is published in the Official Journal of the European Union for the currency in question, conversion shall be made at the average of the monthly accounting rates established by the Commission and published on its [website](#), determined over the corresponding reporting period.

Beneficiaries with general accounts in euro shall convert costs incurred in another currency into euro according to their usual accounting practices.

Where the implementation of the action requires the award of procurement contracts (implementation contracts), the Beneficiary must award the contract to the bid offering best value for money or the lowest price (as appropriate), avoiding conflicts of interests and retaining the documentation for the event of an audit. Detailed information on subcontracting is provided in the Guide for applicants.

e) Financial support to third parties

The applications may not envisage provision of financial support to third parties.

f) Non-profit rule

EU grants may not have the purpose or effect of producing a profit within the framework of the action. Profit shall be defined as a surplus of the receipts over the eligible costs incurred by the Beneficiary, when the request is made for payment of the balance. In this respect, where a profit is made, the Commission shall be entitled to recover the percentage of the profit corresponding to the Union contribution to the eligible costs actually incurred by the Beneficiary to carry out the action.

g) Purchase of equipment

The costs for the equipment envisaged to be purchased shall only cover the project duration depreciation costs. The latter shall be written off in accordance with international accounting standards and the beneficiary's usual accounting practices.

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Nevertheless, if necessary to implement the action, the beneficiaries may incur the full cost of some equipment items, infrastructure or other assets (new or second-hand; as recorded in the beneficiary's accounts).

10.2. Maximum amount requested

The EU grant is limited to a co-funding rate of 90% of the total eligible costs of the action.

Consequently, part of the total eligible expenses must be financed from sources other than the EU grant (see section 10.1.c).

²² For further guidance on exchange rate please consult the Guide for Applicants.

10.3. Payment arrangements

A pre-financing payment corresponding to maximum 80% of the EU grant amount will be transferred to the coordinator after the signature of the grant agreement by both parties and in accordance with its terms.

The Commission will establish the amount of the final payment to be made to the coordinator on the basis of the calculation of the final grant amount. If the total of earlier payments is higher than the final grant amount, the beneficiaries will be required to reimburse the amount paid in excess by the Commission through a recovery order.

11. PROCEDURE FOR THE SUBMISSION OF APPLICATIONS

11.1. How to apply

Proposals must be submitted by the deadline indicated in section 3 via the Electronic Submission System. Open calls are published on the [calls for proposals page](#).

Before submitting a proposal both the applicant and co-applicants must be registered via the [Participant Register](#) and obtain the 9-digit **Participant Identification Code (PIC)** (one for each organisation).

In submitting a proposal, the applicant accepts the procedures and conditions as described in this call for proposals and in the documents to which it refers.

No modification of the application is allowed once the deadline for submission has elapsed. However, if there is a need, the evaluation committee on behalf of the authorising officer may correct obvious clerical errors in application documents upon confirmation of the intended correction by the applicant²³.

Applicants will be informed in writing about the results of the evaluation process.

11.2. Related documents

The following documents are available via the Electronic Submission System:

- Application form (Submission Form Part A and Part B)
- Required annex – Audit Report, if applicable²⁴
- Model grant agreement
- Guide for applicants

11.3. Applications for several projects

The applicant may submit more than one application under this call for proposals.

The applicant may be awarded more than one grant under this call for proposals.

An organisation may participate as applicant or co-applicant in several applications.

²³ Article 151 of the Financial Regulation

²⁴ See section 7.1

11.4. Multiple applications for the same project

Only one application will be accepted and evaluated for any given project. In case there are several applications for the same project, the applicant will be asked to clarify which application shall be evaluated.

An action may receive only one grant from the EU budget.

11.5. Contacts

For questions on the online submission tools, please contact the [IT helpdesk](#) via the Funding & Tender Opportunities Portal (FTOP) website.

Non-IT related questions shall be sent to the following email address: HOME-ISF@ec.europa.eu. In order to ensure an efficient handling of any enquiry please indicate clearly the reference of this call for proposals.

Questions will be answered as soon as possible. **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 or on the outcome of the call for proposals before the official announcement of the results.

Applicants are advised to consult the call's website regularly, where the Commission will publish additional relevant information, such as answers to frequently asked questions (if appropriate) or the results of the selection procedure.

12. PUBLICITY

12.1. By the beneficiaries

Beneficiaries must clearly acknowledge the European Union's contribution in all publications or in conjunction with activities for which the grant is used. Please refer to the grant agreement for more details.

12.2. By the Commission

All information relating to grants awarded in the course of a financial year shall be published on an internet site of the European Union institutions no later than the 30 June of the year following the financial year in which the grants were awarded. The Commission will publish the following information:

- name and address of the beneficiary,
- subject of the grant,
- amount awarded.

Upon a reasoned and duly substantiated request by the beneficiary, the publication shall be waived if such disclosure risks threatening the rights and freedoms of individuals concerned as protected by the Charter of Fundamental Rights of the European Union or harm the commercial interests of the beneficiaries.

13. DATA PROTECTION

The reply to any call for proposals involves the recording and processing of personal data (such as name, address and CV). Such data will be processed pursuant to Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of

such data. Unless indicated otherwise, the questions and any personal data requested that are required to evaluate the application in accordance with the call for proposal will be processed solely for that purpose by Commission or third parties acting on behalf and under the responsibility of the Commission.

Personal data may be registered in the Early Detection and Exclusion System by the Commission, should the beneficiary be in one of the situations mentioned in Articles 136 and 141 of Regulation (EU, Euratom) 2018/1046²⁵. For more information see the Privacy Statement on:

https://ec.europa.eu/info/data-protection-public-procurement-procedures_en

14. MEANS OF REDRESS

If, at any stage of the administrative treatment of grant applications, the persons or entities concerned consider that they have been affected by an instance of maladministration, they may, irrespective of any other means of redress, make a complaint to the European Ombudsman in accordance with Article 228(1) of the Treaty on the Functioning of the European Union and as provided by the Parliament Decision of 9 March 1994 on the regulations and general conditions governing the performance of the Ombudsman's duties published in Official Journal L 113 of 4 May 1994.

²⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1046>