Pilot Project

Call for proposals

Advancing Social Cohesion in the Face of Polarized Public Discourse

(PPPA-2026-SOCIAL-COHESION)

Version 1.0
22 January 2026

HISTORY OF CHANGES			
Version	Publication Date	Change	Page
1.0	22.01.2026	▪ Initial version	
		▪	
		▪	
		▪	

EUROPEAN COMMISSION
Directorate-General for Communications Networks, Content and Technology

Directorate Media Policy
UNIT I.4. – Media convergence and Social media

CALL FOR PROPOSALS

0. Introduction

This is a call for proposals for EU action grants in the field of pilot projects and preparatory actions.

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

– Regulation 2024/2509 (EU Financial Regulation)[1] Pilot project action within the meaning of Article 58(2)(a)

The call is launched in accordance with the Financing Decision[2] and will be managed by the European Commission, Directorate-General for Communications Networks, Content and Technology (DG CONNECT).

The call covers the following pilot project: Advancing Social Cohesion in the Face of Polarized Public Discourse

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 (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)

– how to submit an application (section 11)

– the Online Manual outlines the:

– procedures to register and submit proposals online via the EU Funding & Tenders Portal (**'Portal'**)

– 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] Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September **2024 on the financial rules applicable to the general budget of the Union (recast) ('EU Financial Regulation') (**OJ L, 2024/2509, 26.9.2024).

[2] Commission Implementing Decision C(2025)1576 final of 18/03/2025 concerning the adoption of the work programme for 2025 and the financing decision for the implementation of the pilot projects and preparatory actions in the field of "Communications Networks, Content and Technology" .

1. Background

Polarisation refers to the process by which opinions, attitudes, and identities within a society become increasingly divided along distinct lines, often producing entrenched camps with little common ground. In democracies, some degree of polarisation is natural, differences in political views allow for robust debate, accountability, and the contestation of ideas. However, when polarisation becomes extreme, it can undermine the trust, legitimacy, and cooperation necessary for the system to function. When polarisation crosses into the affective or extreme ideological realm, consensus shrinks and the legitimacy of institutions, trust erodes, hostility toward different societal groups grows, and susceptibility to information manipulation and disinformation rises.

The polarisation of online political discourse poses a growing threat to social cohesion and democratic resilience across the European Union. Digital platforms have become key arenas for political debate and civic engagement, but the same algorithmic systems that drive reach and engagement can also amplify extreme, divisive or manipulative content. In this, coordinated malicious influence operations and disinformation campaigns can flourish, undermining trust in democratic institutions and distorting public understanding of key societal issues.

Protecting the integrity of democratic debate is a delicate endeavour which needs to fully respect and uphold fundamental rights, such as the freedom of expression and the freedom to hold opinions. It requires a deep, evidence-based understanding of how polarising narratives circulate and gain traction online. This means developing neutral and scientifically robust ways to observe, analyse and interpret online discourse in different contexts and languages. Such analysis must cover diverse political expressions and respect freedom of expression while helping to analyse patterns that pose risks to balanced debate.

In response, this pilot project will contribute to the European Commission's broader Democracy Shield initiative by providing actionable insights into the drivers and impact of online polarisation. Through advanced sentiment, discourse and network analysis — underpinned by strict compliance with the General Data Protection Regulation (GDPR) and supported by the Digital Services Act (DSA) — the project will help identify how polarising or manipulative content spreads, the ways it gets amplified, and how its impact can be mitigated. Collaboration with trusted partners, including fact-checkers, research institutions, media and technology actors, will ensure that findings are based on the highest ethical and professional standards, support evidence-based policy measures and practical strategies.

Furthermore, this pilot project will contribute to situational awareness which is a pillar of the Democracy Shield by deepening understanding of how campaigns spread online and how they impact the integrity of the information space. This work will also contribute to prepare for the creation of a common research framework recently announced in the Democracy Shield Communication.[3]

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

Objectives

---

[3] https://commission.europa.eu/document/2539eb53-9485-4199-bfdc-97166893ff45_en
European Commission / HRVP, *European Democracy Shield: Empowering Strong and Resilient Democracies*, JOIN(2025) 791 final, 12.11.2025, outlining EU measures to strengthen democratic resilience and protect elections from foreign interference and disinformation.

The overall objective of this pilot project is to advance social cohesion and democratic resilience across the European Union by addressing the growing risks of online political polarisation. In an era when social media has become a primary channel for political debate, it is essential to develop a neutral, scientifically robust methodology for analysing discourse that respects freedom of expression while identifying harmful manipulation and polarising trends.

The project aims to build a solid foundation for understanding how diverse political expressions circulate and interact online, and how this engages with offline discourse and actions. It will apply advanced IT tools, such as AI-powered sentiment, discourse and network analysis, to observe and map polarising dynamics in multiple languages and contexts. This work will be conducted in full compliance with the General Data Protection Regulation (GDPR).

The project will help develop practical, evidence-based strategies to mitigate online polarisation, by fostering collaboration between a wide range of stakeholders, notably media and social media organisations, online platforms, creative practitioners, technology companies, civil society organisations, information integrity professionals, fact-checkers, media literacy practitioners, educational, cultural and research institutions, universities and organisations, and think tanks. Results will contribute **directly to the European Commission's broader Democracy Shield initiative and inform** future policy measures aimed at promoting balanced, constructive public debate across Europe.

The primary objective of this call is to advance interdisciplinary research on polarisation in the digital age, with particular focus on its role as a driver of systemic risk to democratic institutions, social cohesion, and public trust. The idea is to put together existing research and build on top of it. To achieve this overarching aim, the project will pursue the following specific objectives:

- Develop and apply a neutral, scientifically robust methodology to analyse online political discourse and polarisation across the EU, ensuring balanced coverage of diverse political viewpoints. The methodology should be applied in a representative set of countries and languages.

- Design and prototype GDPR-compliant IT and AI tools for multilingual sentiment, discourse, and network analysis to track polarisation (affective, ideological, and network-based), disentangle its drivers from platform design and wider societal dynamics, and examine feedback loops between online discourse and offline events shaping societal resilience.

- Co-design, test, and evaluate evidence-based interventions—technical, social, and policy-oriented—to mitigate harmful polarisation while safeguarding freedom of expression and open democratic debate, working through a European User Network with capacity-building resources (training, playbooks, localisation kits).

- Evaluate, document, and disseminate insights through standardised case outputs, practical overviews and comparative briefs to contribute to situational awareness and to inform policy. Translate findings into implementation roadmaps (owners, timelines, KPIs). The project will conduct outreach to relevant stakeholders and establish a network, including to mobilise participation to support the preparation of the common research support framework envisaged under the Democracy Shield.

For the purpose of this pilot project:

- Online Polarisation refers to the spread and amplification of extreme or divisive views in public discourse, often fuelled by algorithmic amplification, filter bubbles, and manipulative tactics that exploit emotions.

- Neutral, Scientifically Robust Methodology means a data-driven approach that includes diverse political expressions from across the spectrum to include people with different political opinions.

- AI-Powered Monitoring refers to the use of sentiment, discourse and network analysis tools to systematically examine trends, narratives and influential actors online, in line with EU data protection and ethical standards.

Themes and priorities (scope)

1. Analysis and Monitoring Methodology and Innovative Tools for Understanding Polarisation

A central theme of this pilot project is <u>the development of a neutral and scientifically sound approach to analysing political discourse and polarisation</u>. Proposals should outline how they will combine advanced sentiment, discourse and network analysis to map trends, narratives and influential actors that contribute to political polarisation across the EU. While the priority focus remains on EU Member States, the proposed methodology and its implementation may also examine candidate countries, e.g. those that exhibit vulnerabilities.[4] The methodology must be demonstrably objective, covering a balanced spectrum of political viewpoints and ensuring that data collection and analysis are transparent, reliable and unbiased.

The methodology would then serve as the basis for the <u>design, development and testing of innovative IT and AI tools and techniques that can analyse multilingual online content at scale</u>. These tools should provide actionable insights into how polarising or manipulative narratives emerge, spread and interact within digital information environments. Proposals should demonstrate how these technical solutions will help identify risks to information integrity while preserving freedom of expression and the diversity of political debate. Where appropriate, synergies with other EU-funded research and technology initiatives should be sought to maximise impact and cost-effectiveness and avoid duplication. An initial concept of the methodology and toolset should be developed early so that it can be presented and discussed with stakeholders at the pan-EU regional conference (see Section 2), which will mark the joint launch of activities 1 and 2 and implement it to produce a state of affairs on polarisation in EU Member States. The project should consider the sustainability of the methodology and tools after the end of the project.

- The methodology will pair a rigorous theoretical framework with IT and AI tools. It will relate polarisation to democratic stability; refine typologies (affective, ideological, cultural, epistemic); examine online–offline interactions; and set thresholds between healthy contestation and harmful division. It will also measure and monitor ideological, affective, and network-based polarisation across contexts, including before and during elections. It will look at logical fallacies and examine their use in discourse. This will all be situated in terms of the relevant. economic, psychological (for example moral foundations theory), and sociological factors. Rather than beginning from first principles, the project should focus on value creation: reuse established methodologies and tools and build upon them, introducing new tools only to address unmet needs.

---

[4] However, please be aware that non-EU entities cannot be part of the consortium for this project.

- It will isolate causal drivers in digital environments by distinguishing platform-originated factors (e.g., recommender systems, algorithmic amplification, engagement ranking, bots/synthetic actors, influencer dynamics) from dynamics rooted in pre-existing social, political, or psychological conditions that platforms amplify. The methodology will map feedback loops between online discourse and offline events and assess their effects on societal resilience.

- The methodology should be tailored to the European context, considering a variety of countries and languages. Having a good geographic balance and coverage both in terms of use cases and consortium composition is a priority for this project. Therefore, the work should be able to cover the different areas of the EU (Central and Eastern Europe, Southern Europe, Northern Europe, Western Europe).

- The project should also include the training of an AI-based model to identify polarising language online in a variety of languages. This could include a variety of tasks linked to model training & evaluation: Train/finetune AI components (classification, stance/valence, conversational risk signals, narrative clustering, sentiment analysis, identification of logical fallacies and biases); multilingual alignment and fairness audits; human-in-the-loop review.

- The methodology will fully respect the freedom of expression and diversity of views.

2. European Regional Knowledge Exchange and Implementation Pathways for Social Cohesion

The initiative includes a pan-EU conference in Month 3 of the project, designed to surface, validate, and cross-pollinate effective on-the-ground de-polarisation and social **cohesion initiatives, informing the project's methodology and tooling. From the outset** of the action, this conference and the necessary preparations will run in parallel with the development of the Analysis and Monitoring Methodology and Innovative Tools for Understanding Polarisation. The conference will serve as the joint starting point for activities 1 and 2: actors from the field will present their ideas, and the initial concept of the methodology and tools will be presented and discussed with participants. It should also map already existing initiatives, tools and technologies to avoid duplication, create synergies and foster collaboration.

- Convene & curate: Open call for cases/demos; region-balanced panels, clinics, tool walkthroughs; structured matchmaking to speed replication.

- Capture & synthesise evidence: Standard templates for interventions, success/failure; rapid regional & cross-regional briefs to guide Step 2 (analysis and tooling) and seed Step 3 (European User Network) pilots.

- Build capacity & disseminate: Hands-on workshops; localisation (language packs, facilitation templates); public report plus recordings for reuse. There will be one final mandatory workshop meant to disseminate the results with potential stakeholders.

- Foresight: Looking at the trends and developments.

3. Collaboration and Practical Mitigation Strategies

Equally important is the commitment to build cross-sector and cross-border partnerships that translate analytical insights into practical actions. Proposals should show how they will work and cooperate with relevant stakeholders to develop, test, and scale realistic mitigation strategies that counter harmful effects of polarisation without restricting open, democratic debate. Sharing lessons learned and best practices will help ensure that project results can also inform future EU policy and strengthen societal resilience across Member States.

As part of this collaboration, the project will establish a European User Network focused on reusability, scale, and sustainability: a durable network of European users who apply and help to further shape and continuously improve the methodology and tools, enabling reuse well beyond the pilot. To support this, the consortium will recruit and involve a wide range of relevant stakeholders (this can include but is not limited to media partners, fact-checkers, researchers, media literacy specialists, civil society, and public bodies across all EU regions), and put in place a light-weight governance structure and code of conduct to ensure transparency, ethics, and effective decision-making.

- European User Network, partnerships & governance: Create a durable EU-wide user network; recruit and involve a wide range of relevant stakeholders and operate under a code of conduct and light governance structure, with a concrete sustainability plan for post-project maintenance and funding.

- Mitigation strategies & evaluation: Design and test interventions that sustain balanced, constructive, and open online political discourse (e.g., bridging algorithms and tools, deliberative mechanisms, media literacy initiatives, civil society outreach and engagement measures, translation approaches informed by moral foundations theory etc.), with clear impact metrics and iteration cycles. This should include actions to be tested with a broad involvement of citizens.

- Engagement & capacity building: Combine arts-based practices with critical/media literacy to co-create solutions; deliver training sessions, playbooks, and open office hours; and provide localisation kits (language packs, onboarding, facilitation templates) to enable rapid reuse across Member States.

- Contribute to building up situational awareness: Create strategies and inputs to enhance situational awareness, which is a pillar of the Democracy Shield. The project should in particular develop relevant dashboards as well as briefs/reports/overviews etc that could feed into situational awareness under the Shield. The work under the project should also contribute to the preparation of the creation of a common research framework recently announced in the Democracy Shield Communication.

Activities that can be funded (scope)

To implement the minimum requirements described in the previous section, a wide range of activities can be funded under this call. These activities could involve, but do not have to be limited to:

- Pan-European and/or regional convenings and knowledge exchange. Organisation of a pan-EU conference in Brussels, and/or a series of regional conferences (North, South, East, West) with open calls for case studies, panels, clinics, and tool demos; produce standardised case write-ups, comparative briefs, and recordings to feed subsequent analysis and network building, and collection of ideas on how to support the European Democracy Shield. Organisation of the final workshop.

- **Methodology design and multilingual data collection.** Development of a transparent theoretical framework and measurement protocol (typologies of affective/ideological/cultural/epistemic polarisation; thresholds between healthy contestation and harmful division); implementation of multilingual data pipelines linking online signals to offline context, with pre-registration and clear reproducibility standards. Incorporation of relevant economic, psychological (such as moral foundations theory), and sociological methodologies.

- **Development of IT-based tools.** Development of open-source, modular software components and integrated platforms for data ingestion, processing, and visualisation; ensure high levels of interoperability through standardized APIs and common data schemas that facilitate cross-platform analysis and integration with European research infrastructures; create intuitive, user-friendly tools tailored to diverse stakeholder needs, ranging from policymakers to researchers and civil society organizations.

- **IT and AI tooling R&D under EU rules.** Design and prototyping of GDPR-compliant tools for sentiment, discourse, stance/valence, narrative clustering, and network analysis, logical fallacy detection, including documentation, model cards, and risk registers aligned with DSA Article 40 researcher access where applicable.

- **Model training, evaluation, and fairness.** Training/finetuning of multilingual models; running of accuracy, robustness, and calibration tests; performance and bias/fairness audits and multilingual alignment checks; human-in-the-loop review, red-teaming, and error analysis to ensure reliability across countries and languages.

- **Monitoring and reporting infrastructure.** Building **a "Polarisation Monitor"** with dashboards and APIs that track trends, actors, and narrative flows over time; including election-period modules, alerting for rapid shifts, and open, well-documented indicators for researcher and policymaker use, complemented by public-facing visualisations that translate complex polarisation dynamics into accessible, human-scale experiences (with clear uncertainty communication and methodological transparency), and foresight tools.

- **Intervention design, piloting, and evaluation.** Co-design and testing of technical, social, and policy-oriented interventions (e.g., deliberative formats, bridging algorithms, logical fallacy explainers, civic-tech prompts, media literacy and arts-based modules, citizen engagement measures) which could also include speculative-design prototyping and participatory co-creation (storytelling/world-building) to generate culturally adaptable intervention variants; evaluation with pilots, A/B tests or field experiments.

- **Producing briefs/reports/overviews and analysis.** The creation of briefs/reports/overviews and relevant analysis to provide an overview of the state of play of polarisation in EU Member States with all its relevant aspects. Candidate countries may be also included in the coverage as relevant. Different types of quantitative and qualitative data collection and analyses linked to this as well as the creation of relevant dashboards and overview tools, including foresight.

- **European User Network and capacity building.** Establishment of a durable network of relevant stakeholders; operating under a light governance structure and code of conduct.

- Dissemination, policy interface, and sustainability. Production of practitioner toolkits; policy workshops with relevant EU initiatives (e.g., Democracy Shield, EDMO hubs); post-project governance, maintenance, and funding to ensure reuse and long-term uptake, including visual storytelling assets, co-creation facilitation kits, and tested interface/design patterns to enable rapid adoption by civil society, media literacy actors, and public bodies. This includes a final mandatory workshop at the end of the project with potential stakeholders.

Expected impact

This pilot project is expected to produce concrete, actionable outcomes that help better understand and address the drivers of political polarisation, while safeguarding freedom of expression and supporting balanced, evidence-based public debate. The results will contribute directly to the Democracy Shield and strengthen long-term social cohesion and democratic resilience.

Expected impacts include:

- A neutral, scientifically validated methodology for monitoring and analysing online political discourse and polarisation across a representative set of countries and languages, providing policymakers and stakeholders with reliable data and insights into how polarising narratives develop, spread and interact online.

- Measurement of polarisation and related metrics, taking into account both online and offline aspects, with quantitative metrics and qualitative analyses. Production of relevant dashboards and a series of briefs/reports/overviews summarising these findings.

- A set of advanced AI-powered tools and techniques for multilingual sentiment, discourse and network analysis, designed and tested to ensure transparency, neutrality and compliance with GDPR and the Digital Services Act, and adaptable for future research and policy needs.

- Development and testing of evidence-based mitigation strategies and interventions that translate analytical findings into practical measures for countering polarisation online, while fully respecting freedom of speech and the diversity of political expression in the EU. This could feed into societal resilience building actions to be deployed in the future. Establish sustainable cross-sector and pan-European collaboration networks that bring together a wide variety of relevant players, creating a strong foundation for continuous and durable cooperation, knowledge-sharing, as well as policy support related to broader EU initiatives such as the Democracy Shield. In this regard, the funded project will be expected to facilitate discussions among key stakeholders to prepare the establishment of the common research framework.

3. Available budget

The available call budget is EUR 785 000. The EU co-financing is limited to a *maximum of 85% of the total eligible costs.*

We expect to fund 1 project for a maximum requested grant amount of EUR 785 000. This does not preclude the submission/selection of a proposal requesting a lower amount

The grant awarded may be lower than the amount requested.

We reserve the right not to award all available funds or to redistribute them between the call priorities, depending on the proposals received and the results of the evaluation.

4. Timetable and deadlines

Timetable and deadlines (indicative)	
Call opening:	12/02/2026
Deadline for submission:	31/03/2026– 17:00:00 CET (Brussels)
Evaluation:	Q2/2026
Information on evaluation results:	Q2/2026
GA signature:	Q3/2026
Start date of the project	At the earliest 01/09/2026 and latest by 01/10/2026

Duration

The project should normally run for up to 15 months.

Extensions are possible, if duly justified and through an amendment

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 Calls for proposals 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 *(template to be downloaded from the Portal Submission System, completed, assembled and re-uploaded)*

– Mandatory annexes and supporting documents *(templates to be downloaded from the Portal Submission System, completed, assembled and re-uploaded)*:

    – detailed budget table/calculator

    – CVs (standard) of core project team

– list of previous projects (key projects for the last 3 years) *(template available in Part B)*

Please note that the amounts entered into the summarised budget table (filled in directly online) must correspond to the amounts calculated in the detailed budget table. In case of discrepancies, the amounts in the online summarised budget table will prevail.

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 all 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 (please check carefully the layout of the documents uploaded).

Proposals are limited to maximum 70 pages (Part B). Evaluators will not consider any additional pages. Shorter proposals are welcome.

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))

Proposals may be submitted by any of the following combinations of:

- media and social media organisations, online platforms, creative practitioners, and technology companies;

- civil society organisations;

- information integrity professionals, fact-checkers, media literacy practitioners;

- educational, cultural and research institutions, universities and organisations, think tanks.

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 and definitions

<u>Natural persons</u> — 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).

<u>International organisations</u> — International organisations are NOT eligible.

<u>Entities without legal personality</u> — 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 persons[5].

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

<u>Affiliated entities</u>[6]

Legal entities having a legal or capital link with applicants, which is neither limited to the action nor established for the sole purpose of its implementation, may take part in the action as affiliated entities, and may declare eligible costs as specified in section 10.

For that purpose, applicants shall identify such affiliated entities in the proposal and application form.

<u>Associations and interest groupings</u> — Entities composed of members may participate as 'sole beneficiaries'[7] or 'beneficiaries without legal personality'[8]. ⚠ 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).

<u>EU restrictive measures</u> — Special rules apply for entities subject to <u>EU restrictive measures</u> under Article 29 of the Treaty on the European Union (TEU) and Article 215 of the Treaty on the Functioning of the EU (TFEU)[9]. 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).

<u>EU conditionality measures</u> — Special rules apply for entities subject to measures adopted on the basis of EU Regulation 2020/2092[10]. Such entities are not eligible to participate in any funded role (beneficiaries, affiliated entities, subcontractors, recipients of financial support to third parties, etc). Currently such measures are in place for Hungarian public interest trusts established under the Hungarian Act IX of 2021 or any entity they maintain (see <u>Council Implementing Decision (EU) 2022/2506</u>, as of 16 December 2022).

---

[5] See Article 200(2)(c) EU Financial Regulation <u>2024/2509</u>.

[6] In accordance with Article 190 FR, entities that satisfy the eligibility criteria and that do not fall within one of the situations referred to in Articles 138(1) and 143(1) FR and that have a link with the applicant, in particular a legal or capital link, which is neither limited to the action nor established for the sole purpose of its implementation, will be considered as entities affiliated to the applicant.

[7] See Article 190.1 (a) EU Financial <u>Regulation - 2024/2509</u> - Entity which itself is not a legal entity, but is made up of several legal entities which satisfy the criteria for applying for a grant (e.g. European Research Infrastructure Consortia (ERICs), European economic interest groupings (EEIG), European groupings of territorial cooperation (EGTC), joint ventures, etc) does NOT mean the same as mono-beneficiary.

[8] For the definitions, see Articles 190(2) and 200(2)(c) EU Financial Regulation <u>2024/2509</u>.

[9] Please note that the EU Official Journal contains the official list and, in case of conflict, its content prevails over that of the <u>EU Sanctions Map</u>.

[10] Regulation (EU, Euratom) 2020/2092 of the European Parliament and of the Council of 16 December 2020 on a general regime of conditionality for the protection of the Union budget (OJ L 325, 20.12.2022, p. 94).

The indicative list of affected entities (the trusts and the entities they maintain) is available under this link[11]. This link will bring you to the official Annex to Hungarian Act IX of 2021.

ℹ️ For more information, *see Rules for Legal Entity Validation, LEAR Appointment and Financial Capacity Assessment*.

Consortium composition

Proposals must be submitted by a **consortium** of at least **5 applicants** (beneficiaries; not affiliated entities), which complies with the following conditions:

- Minimum 5 independent entities from 4 different eligible countries.

- At least one applicant is an organisation with expertise in research on polarisation and,

- At least one applicant is a civil society organisation with relevant expertise on information integrity [12] and/or polarisation and,

- At least one applicant is a company with proven technological expertise.

A good balance among consortium members is required in terms of competencies and main tasks allocation to carry out the project We also encourage a good geographical **balance in terms of the consortium members' presence in and experience of different** EU Member States.

Affiliated entities to a beneficiary, if any, do not sign the grant and therefore do not become beneficiaries themselves, do not count for the minimum number of applicants.[13]

Associated partners, if any, are considered third parties (see section 13). They do not sign the grant and therefore do not become beneficiaries themselves, are not applicants, not part of the consortium and hence do not count for the minimum number of applicants.

Eligible activities

Applications will only be considered eligible if their content corresponds wholly (or at least in part) to the topic description for which they are submitted.

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

The following activities are not considered as eligible for funding under this call:

- Funding of activities linked to political parties or political campaigns

---

[11] 2021. évi IX. törvény - Nemzeti Jogszabálytár

[12] Information integrity is defined as a safely navigable information sphere that promotes access to accurate, reliable, evidence-based, and plural information sources to all, fully upholding the freedom of speech and enabling individuals to be exposed to plural and diverse ideas, make informed choices, and better exercise their rights. Risks related to information integrity include foreign interference and information manipulation, different online manipulation tactics and techniques, malicious disinformation campaigns, conspiracy theories, artificial amplification of content, undeclared use of generative AI in the form of manipulated pictures, deep fakes, voice manipulation etc

[13] **Except for the case of 'Sole' beneficiary.** Entity which itself is not a legal entity but is made up of several legal entities which satisfy the criteria for applying for a grant.

If applicable, 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 must comply with EU policy interests and priorities. Projects must also respect EU values and European Commission policy regarding reputational matters (*e.g. activities involving capacity building, policy support, awareness raising, communication, dissemination, etc*).

Financial support to third parties is not allowed.

Geographic location (target countries)

Proposals must relate to activities taking place in the eligible countries *(see above)*.

Ethics

Projects must comply with:

— highest ethical standards and

— applicable EU, international and national law.

Security

No specific rules. Please refer to the general provisions in the MGA (Art. 13).

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 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)

— 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 responsibilities 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

- reject the participation of the applicant in the proposal and request reallocation of the tasks to another applicant of the consortium or his replacement without compromising the quality of the proposal;

- request that you are replaced or, if needed, reject the entire proposal.

If the financial capacity of the consortium as a whole or of the coordinator or "sole applicant/beneficiary" is considered insufficient, the Authorised Representative Officer of the Commission may reject the application.

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

- **applicants' activity reports of last year**

- list of previous projects (key projects for the last 4 years) *(template available in Part B)*.

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

In the event of an application grouping several applicants (consortium), the above requirements shall apply to the combined capacity of all members of the consortium. Combined capacity means that individually, each member of the consortium should comply with the criteria corresponding to its task in the project.

In the case of legal entities forming one **applicant (the "sole applicant/beneficiary"), as** specified in section 6, the above requirements apply to each one of those entities.

Public bodies, and Member State 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 participate[14]:

– bankruptcy, winding up, affairs administered by a liquidator or by a court arrangement with creditors, suspended business activities or other similar procedures (including procedures for persons with unlimited liability for the **applicant's** debts) provided for under Union or national law

– in breach of social security or tax obligations (including if done by persons with unl**imited liability for the applicant's debts)**

– guilty of grave professional misconduct[15] (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 EU Regulation 2988/95 (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)

– 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)

– intentionally and without proper justification resisted[16] an investigation, check or audit carried out by an EU authorising officer (or their representative or auditor), OLAF, the EPPO, or the European Court of Auditors.

Applicants will also be rejected if it turns out that[17]:

– during the award procedure they misrepresented information required as a condition for participating or failed to supply that information

---

[14] See Articles 138 and 143 of EU Financial Regulation 2024/2509.
[15] 'Professional misconduct' includes, in particular, the following: violation of ethical standards of the profession; wrongful conduct with impact on professional credibility; breach of generally accepted professional ethical standards; false declarations/misrepresentation of information; participation in a cartel or other agreement distorting competition; violation of IPR; attempting to influence decision-making processes by taking advantage, through misrepresentation, of a conflict of interests, or to obtain confidential information from public authorities to gain an advantage; incitement to discrimination, hatred or violence or similar activities contrary to the EU values where negatively affecting or risking to affect the performance of a legal commitment.
[16] 'Resisting an investigation, check or audit' means carrying out actions with the goal or effect of preventing, hindering or delaying the conduct of any of the activities needed to perform the investigation, check or audit, such as refusing to grant the necessary access to its premises or any other areas used for business purposes, concealing or refusing to disclose information or providing false information.
[17] See Article 143 EU Financial Regulation 2024/2509.

- 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 the standard submission and evaluation procedure (one-stage submission + one-step evaluation).

An evaluation committee (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 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. These factors will be documented in the panel report.

All proposals will be informed about the evaluation result (evaluation result letter). The successful proposal 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. Full 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 will be 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:

1. Relevance (40 points):

- Clarity and consistency of the action

- Objectives and extent to which they match the themes and priorities and objectives of the call

- Contribution to the EU strategic and legislative context

- European/trans-national dimension

- Impact/interest for a number of EU countries; possibility to use the results in other countries; potential to develop mutual trust/cross-border cooperation

- Expertise and added value in research on polarisation

2. Quality (40 points):

- Logical links between the identified problems, needs and solutions proposed (logical frame concept)

- Quality of the consortium and project teams[18]

- Appropriate procedures and problem-solving mechanisms for cooperating within the project teams and consortium

- Methodology for implementing the project (concept and methodology, organisation of the work (procedures and allocation of resources), management, involvement of subcontractors, timetable, risks and risk management, monitoring and evaluation)

- Cost effectiveness (sufficient/appropriate budget for proper implementation; best value for money)

3. Impact (20 points):

- Ambition and expected long-term impact of results on target groups/general public

- Appropriate dissemination strategy

- Possibility to use the results in other countries

- Sustainability of results after EU funding ends

Award criteria	Minimum pass score	Maximum score
Relevance	24	40
Quality	24	40
Impact	12	20
Overall (pass) scores	60	100

---

[18] This includes the operational capacity (know-how, qualifications, human and technical resources, EU dimension), as indicated in Section 7.

Maximum points: 100 points.

Individual thresholds per criterion: 60%.

Overall threshold: 60 points

Proposals that pass the individual thresholds AND the overall threshold will be considered for funding — within the limits of the available budget (i.e. up to the budget ceiling) and the number of projects to be funded, as announced in section 3. 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[19] will be after grant signature. A retroactive starting date can be granted exceptionally for duly justified reasons — but never earlier than the proposal submission date.

Project starting date: *see timetable section 4 above*

Project duration: *see section 4 above*.

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 the project:

- Midterm Progress Report (submitted mid-way through the project)

- Final Report (submitted at the end of the project – should include a reflection on the sustainability of the results beyond the end of the project)

- Final Workshop (toward the end of the project) in Brussels

- State of the Art Analysis looking into the state of the art of scientific research on polarisation, as well as existing technical tools available for this purpose (to be submitted the 3rd month of the project)

---

[19] The project start date must normally be the first day of a month and later than the entry into force of the agreement. The Commission can decide on another date, if justified by the applicants. However, the starting date may not be earlier than the submission date of the grant application – except if provided for by the basic act or in cases of extreme urgency and conflict prevention (Article 196 EU Regulation - 2024/2509).

- A series of reports on the state of polarisation in the EU Member States, and if relevant in candidate countries (at least one report mid-way through the project and one toward the end of the project, minimum 7 countries to be covered)

In addition, the project will be expected to submit shorter periodic progress reports (every two months) not linked to payments.

To note, the Final Workshop is different from the conference that is to be organised around Month 3 of the project. The Final Workshop should be a smaller event, meant to present the final results of the project with potential stakeholders and potentially define how those results could further support broader EU initiatives such as the Democracy Shield.

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 (requested grant amount): *see section 3 above.*

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 (maximum 85%).

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: (e.g. maximum levels per categories)
- 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 – N/A
- 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
  - D.1 Financial support to third parties – N/A
- E. Indirect costs

  Specific cost eligibility conditions for this call:
- personnel costs:
  - SME owner/natural person unit cost[20]: Yes
  - **Volunteers' cost: N**/A
- subcontracting costs:
  - additional subcontracting rules: Yes
    - subcontracting may not cover core tasks of the action[21]
    - Subcontracting costs should not represent more than 30 % of the total eligible direct costs of the action
- purchase costs
  - travel and subsistence unit cost[22]: Yes[23]
  - equipment costs: depreciation
  - 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)**

  ⚠️Applicants' attention is drawn to the fact that if they are receiving an operating grant financed by the EU or Euratom budget, they may not declare indirect costs for the period(s) covered by the operating grant, unless they can demonstrate that the operating grant does not cover any costs of the action. If you intend to also apply for action grants while receiving an operating grant, please make sure that you either have the accounting tools in place to combine them (or that the operating grants pays off — meaning that it covers enough of your general running costs and overheads to compensate the loss of the indirect costs in the action grants).
- VAT: non-deductible/non-refundable VAT is eligible (but please note that since 2013 VAT paid by beneficiaries that are public bodies acting as public authority is NOT eligible)
- other:
  - in-kind contributions for free are allowed, but cost-neutral, i.e. they cannot be declared as cost

---

[20] 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)7115).

[21] See also section 13- Subcontracting going beyond 30% of the total eligible costs must be justified in the application.

[22] 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).

[23] See EU Grants AGA — Annotated Grant Agreement, art 6 on eligible costs: travel and subsistence costs must be declared using the unit cost according to Annex 2a of the grant agreement. If a particular instance of travel, accommodation or subsistence in the action is not covered by one of the unit costs mentioned in Decision C(2021)35 the actual costs may be used.

- kick-off meeting: costs for kick-off meeting organised by the granting authority are eligible (travel costs for maximum 2 persons, return ticket to Brussels and accommodation for one night) only if the meeting takes place after the project starting date set out in the Grant Agreement; the starting date can be changed through an amendment, if needed

- project websites: communication costs for presenting the project on the **participants' websites or social media accounts** are eligible; costs for *separate* project websites are not eligible

- other ineligible costs: No

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 70% 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 one final payment (with detailed cost reporting, an interim report (not linked to payment) and a final report). In addition, you will be expected to submit one or more progress reports not linked to payments.

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 you or 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.

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

Prefinancing guarantees are normally requested from the coordinator, for the consortium. They must be provided during grant preparation, 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 *(art 23)*.

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 one of the following:

- limited joint and several liability with individual ceilings — *each beneficiary up to their maximum grant amount*

- unconditional joint and several liability — *each beneficiary up to the maximum grant amount for the action*

 or

- individual financial responsibility — *each beneficiary only for their own debts*.

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

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

- durability: No

    Other specificities

Consortium agreement: Yes

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 Calls for proposals 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 may 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

- Topic Q&A on the Topic page (for call-specific questions in open calls; not

applicable for actions by invitation)

— Portal FAQ (for general questions).

Please also consult the Topic page regularly, since we will use it to publish call updates. (For invitations, we will contact you directly in case of a call update).

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: CNECT-I4@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). Entities that satisfy the eligibility criteria and that do not fall within one of the situations referred to in Articles 138(1) and 143(1) FR and that have a link with the applicant, in particular a legal or capital link, which is neither limited to the action nor established for the sole purpose of its implementation, will be considered as entities affiliated to the applicant (See Article 190.1 (b) EU Financial Regulation - 2024/2509). If affiliated entities participate in your project, please do not forget to provide documents demonstrating their affiliation link to your organisation as part of your application.
>
> - Sole beneficiaries - Associations and interest groupings (EEIG): Entities composed **of members may participate as 'sole beneficiary' (see Article 190.1 (a) EU Financial** Regulation 2024/2509). Please note that if the action will be implemented by the members, they should also participate (either as beneficiaries or as affiliated entities (if foreseen in the call), otherwise their costs will NOT be eligible). A "sole" beneficiary is a legal entity, whether established specifically or not for the action, and which is:

- — formed of several legal entities complying with the eligibility, non-exclusion and selection criteria set out in this call for proposals, and implementing together the proposed action;

- — and whose participating members are identified in the grant application (Part A and B)

- 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 may implement action tasks but in contrast to affiliated entities they do not need to have a capital or legal link to a beneficiary and cost incurred by Associated Partners can NOT be declared as eligible cost. In contrast to third parties giving in-kind contributions, the associated partners are fully named in the grant agreement and may implement important tasks by themselves. Entities that do not request funding or are not eligible for funding may participate in an action as Associated Partners, for example out of interest in contributing to the objectives of the action, gaining visibility, or participating due to ongoing (scientific) cooperation with a beneficiary. As with any other participant that does not sign the grant agreement, the beneficiaries need to ensure (e.g. through the consortium agreement) that Associated Partners implement their assigned action tasks in accordance with the grant agreement. The tasks must be set out in Annex 1.

- 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).

- 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).

- 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 cumulation of funding/no double funding — It is strictly prohibited to cumulate **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 be declared under two EU grants; projects must be designed as different actions, clearly delineated and separated for each grant (without overlaps).

- 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 Grant Agreement, art 6.2.E)*. In order to demonstrate that the operating grant does not cover any costs of the action, the beneficiary should:

  a. use analytical cost accounting that allows to separate all costs (including overheads) attributable to the operating grant and the action grant. For that purpose the beneficiary should use reliable accounting codes and allocation keys ensuring that the allocation of the costs is done in a fair, objective and realistic way.

b. record separately:

– all costs incurred for the operating grants (i.e. personnel, general running costs and other operating costs linked to the part of its usual annual activities), and

– all costs incurred for the action grants (including the actual indirect costs linked to the action)

If the operating grant covers the entire usual annual activity and budget of the beneficiary, the latter is not entitled to receive any indirect costs under the action grant.

- **Multiple proposals** — Applicants may submit more than one proposal for *different* projects under the same call (and be awarded 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 the others (or they 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.