



FCH2 JU Guide

on proposal submission and evaluation

Version 1.1, 01 May 2015

Disclaimer

This document is aimed at assisting applicants and beneficiaries for FCH2 JU funding. Its purpose is to explain the FCH2 JU programme (most rules similar to Horizon 2020 framework programme) and the procedures to be followed.

This document is already the second version to assist **applicants for FCH2 JU funding**. It contains only sections on proposal submission and evaluation. It has been updated as a consequence of H2020 updates, as follows:

History of changes

Version	Date	Changes
1.1	01.05.2015	<ul style="list-style-type: none"> ▪ Updated chapters on “Ethics review” and “Security scrutiny” ▪ Complaints point was added to Submit a proposal section ▪ Table of content update

For the other sections (principles governing the awards of grants, types of grants, funding rates, register in Beneficiary Register, managing your grant etc), please refer to the Horizon 2020 Grants Manual and Horizon 2020 Annotated Model Grant Agreement.

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I. Applying for funding

Differences to FP7/FCH1 JU

X recommendations of experts limited
X 'negotiation' replaced by 'grant preparation'

I.1 Submit a proposal

Summary

This section explains:

- how you can submit a proposal

Key points

- We will treat your proposal **confidentially**, as well as any related information, data, and documents we receive from you.

We will ensure that the process of handling and evaluating proposals is carried out in a confidential manner.

Experts are also bound by an obligation of confidentiality.

You too should avoid taking any actions that could jeopardise confidentiality. You must not attempt to discuss your proposal with persons you believe may act as expert evaluator for the FCH2 JU.

- Your proposal is archived under **secure** conditions at all times. After the evaluation and signature of any subsequent grant agreement, all copies are destroyed except those required for archiving or auditing purposes.

Your proposal should not contain any information that is 'EU classified' under the rules on security of information in the [Commission internal Rules of Procedure](#) (see also [Guide for classification](#)).

- We will process **personal data** in accordance with [Regulation No 45/2001](#) and according to the 'notifications of the processing operations' to the Data Protection Officer (DPO) of the Commission/FCH2 JU (publicly accessible in the [DPO register](#)).

- Once the coordinator (or sole applicant) has submitted a proposal, you will not hear from us until the proposal has been evaluated, unless:

- we need to contact you (usually through the coordinator) to clarify matters such as eligibility or to request additional information;

- we need more information, or supporting documents, for legal entity validation, financial viability check, ethics review or security scrutiny;

- you have made an enquiry or a complaint or

- the evaluation process involves hearings.

- For details on your call see the [call topic information](#).
- There is a [Helpdesk](#) available to deal with issues relating to the electronic submission of proposals.
- For information on how to register concerns or enquiries please look on the [Participant Portal](#).
- To contact us please use only the electronic exchange system (i.e. the ['My Area' section](#) of the Participant Portal).

I.1.1 Before proposal submission

Draft proposals

The coordinator can enter draft proposals in the 'Electronic Submission Service' of the Participant Portal (accessible via the topic page of your call), using the forms and [templates](#) provided there.

📌 For tips on the ethics self-assessment, see [How to complete your ethics self-assessment](#).

Mock evaluation

As part of the topic information for your call, you will find a link to the [evaluation forms](#) similar to those used by our experts for the evaluation of your proposal.

It is strongly recommended that you use these forms to assess the strengths and weaknesses of your proposal before you submit it. Ideally, ask a disinterested colleague to carry out a mock evaluation.

Checklist for submission

Before the coordinator (or sole applicant) officially submits the proposal, check that:

- your proposal fulfils the conditions set out in the call;
- the proposal (both the administrative forms and technical annex) is complete, readable, accessible and printable.
- the requested declaration have been made
- all consortium members have:
 - obtained access to the electronic exchange system (i.e. the ['My Area' section](#) of the Participant Portal)
 - registered in the Beneficiary Register.

Rules:	
✘	Art 15 RfP
✘	WP/call

I.1.2 Submitting your proposal

Proposals must be submitted by the coordinator **on-line** via the Electronic Submission Service of the Participant Portal and before the call deadline.

We will record the date and time the coordinator submits the proposal, and immediately sends a confirmation e-mail to all applicants.

If you have not received this e-mail, it is because the proposal has not been submitted.

If you miss the call deadline, your proposal will be disregarded by the system and we will not consider it as submitted.

The system carries out basic verification checks for completeness of the proposal, internal data consistency, virus infection file types, size limitations etc.

- ⚠ The system will check page limits in specific parts of the proposal and, if necessary, suggest that you shorten it. After the deadline, unless otherwise indicated in the call, any excess pages will be overprinted with a 'watermark', indicating to evaluators that these pages must be disregarded.

Before the call deadline, the coordinator may replace the proposal with new proposals. We will only keep for evaluation the most recent version submitted.

After the call deadline, changes or additions are no longer possible, unless we ask you to clarify any obvious

clerical errors on your part.

After the call deadline, the system will issue an e-receipt which will be available to all participants via the Participant Portal; it will contain

- the full proposal incl. proposal title, acronym and unique proposal identifier (proposal number);
- the name of the relevant programme part and call identifier; and
- the date and time of receipt (i.e. the call deadline).

 If during the final days of the submission process there is a fault in the system, we may decide to extend the call deadline accordingly.

I.1.3 After proposal submission

Access by the FCH2 JU

We have no access to the proposal before the call deadline. However, so that we can plan the evaluation process and meet the deadline for informing you of the outcome, we will ask you consent to access certain information before the call deadline:

- the call title and the topic for which the proposal is submitted
- the title of the proposal, summary information, keywords
- the identity codes of your organisation(s)

 A disclaimer will inform you that we will be accessing this information and we will give you the opportunity to refuse access.

Withdrawing a proposal

The coordinator can subsequently withdraw your proposal - the guidance documents will explain how to do this.

Multiple proposals

If the coordinator submits a number of similar proposals, we may ask him to choose one or more of them to be withdrawn.

Complaints

If you think that the submission of your proposal was not entirely successful due to a technical error on the side of the Commission, the coordinator may lodge a complaint through the [IT Helpdesk](#) on the Participant Portal. For the complaint to be admissible it must be filed **within 4 calendar days** following that of the call closure. You will receive an acknowledgement of receipt the same or next working day.

You should *secure a PDF version of all the B-parts and annexes of your proposal holding a time stamp* (file attributes listing the date and time of creation and last modification) that is prior to the call deadline dd/mm/yyyy:hh:mm, as well as any proof of the alleged failure (e.g. screen shots). Later in the procedure you may be requested by the IT Helpdesk to provide these items. Please, note that any information regarding the proposal will be treated in a strictly confidential manner.

In order that a complaint would be upheld, the IT audit trail (application log files and access log files of the EC IT-systems involved) must show that there was indeed a technical problem at the EC side which prevented you from submitting (or resubmitting) the proposal using the electronic submission system.

You will be notified about the outcome of the treatment of your complaint as soon as possible and at latest within 15 working days following the reception of your complaint. If a decision cannot be reached in this term

you will receive a holding reply.

If your complaint is upheld, the secured files (provided by you to the IT helpdesk), for which the investigation has demonstrated that technical problems at the EC side prevented (re)submitting, will be used as a reference for accepting the proposal for subsequent evaluation. In absence of such documents, the version present in the IT system will be evaluated.

I.2 Admissibility & eligibility check

Summary

This section explains how and why the FCH2 JU:

- checks admissibility and eligibility of the proposal

Rules:

- × Art 131(2) FR
- × Art 201 RAP
- × Art 7-10 RfP
- × WP/call

I.2.1 Admissibility and eligibility check

We will check your proposal for admissibility (against the general conditions on admissibility set out in General Annex B to the FCH2 JU Annual Work Plan and, if relevant the specific conditions on admissibility set out in the call).

To be considered admissible, a proposal must be:

- submitted in the Electronic Submission System before the deadline given in the call conditions;
- readable, accessible and printable.

Incomplete proposals may be considered inadmissible. This includes the requested administrative data, the proposal description, and any supporting documents specified in the call. General Annex B to the FCH2 JU Annual Work Plan lists the necessary supporting documents.

In case of an 'obvious clerical error' (e.g. *omission to submit evidence or information on a non-substantial element of the proposal*), we may first ask you to provide the missing information or supporting documents.

- ⚠ If the missing information or document would substantially change the proposal, it will not be taken into account.

We will also check your proposal for ineligibility (against the general eligibility criteria set out in General Annexes A and C to the FCH2 JU Annual Work Plan and the specific eligibility conditions set out in the call).

Example:

Research & innovation actions require, for instance, a minimum of three independent legal entities established in different Member States or associated countries¹.

- ⚠ Your proposal must also correspond to the topic description for your call.

I.2.2 Outcome of the admissibility & eligibility check

If your **proposal** is considered **inadmissible** or **ineligible**, we will inform your coordinator (via a 'proposal rejection letter' sent through the electronic exchange system), together with the reasons why and how to appeal.

If the proposal is (for the moment) eligible, but you are not, we will inform you and your coordinator (via an '**applicant rejection letter**' sent through the electronic exchange system).

¹ Further conditions may be set out in the call.

II From evaluation to grant signature

Rules:

- × Art 128(2), 131(3), 132(1,2), 133 FR
- × Art 202, 203, 204 RAP
- × Art 15, 40 RfP
- × WP/call

II.1 Evaluation of proposals and operational capacity check

Summary

This section explains how the FCH2 JU

- chooses its experts
- evaluates your operational capacity
- evaluates your proposal (on its scientific merit)
- establishes its ranked list

Key points

- We will evaluate your proposal with the help of independent external experts.
- We will be guided by the following:
 - **Excellence.** Projects must demonstrate high quality in relation to the topics and criteria set out in the calls.
 - **Transparency.** Funding decisions must be based on clearly described rules and procedures, and applicants should receive adequate feedback on the outcome of the evaluation.
 - **Fairness and impartiality.** All proposals submitted in response to a call are treated equally and evaluated impartially on their merits, irrespective of their origin or the identity of the applicants.
 - **Efficiency and speed.** Evaluation, award and grant preparation should be done as quickly as possible without compromising quality or neglecting the rules.
 - **Ethics and security.** Proposals must not contravene fundamental ethical principles or relevant security procedures

II.1.1 Evaluation and operation capacity

If your proposal is admissible and eligible (or if admissibility and/or eligibility cannot immediately be determined), it will be evaluated by independent experts on its scientific merits.

All proposals within a call (or within a coherent part of a call) are evaluated together.

To evaluate your capability, the experts will also give an opinion on your operational capacity to implement the action

II.1.2 Evaluation by independent experts

In order to ensure that only proposals of the highest quality are selected for funding, we rely on **independent experts** for the evaluation of proposals ('evaluators').

How are the evaluators selected? We appoint independent evaluators for each call from the database of experts. When selecting evaluators, we look for:

- a high level of skill, experience and knowledge in the relevant areas (*e.g. project management, innovation, exploitation, dissemination and communication*)

and, provided the above condition can be satisfied, a balance in terms of:

- skills, experience and knowledge;
- geographical diversity;
- gender;
- where appropriate, the private and public sectors, and
- an appropriate turnover from year to year.

In principle, your proposal will be examined initially by at least three experts (in many cases, five or more). Additional **ethics experts** will be appointed for the ethics review.

In addition, the evaluation process may be followed by one or more **independent observers**:

- to observe the practical workings of the evaluation process;
 - to give independent advice on:
 - the conduct and fairness of the evaluation sessions;
 - the application of the award criteria;
 - ways in which the procedures could be improved
- but
- not to express views on the proposals or the other experts' opinions.

⚠ Experts that have a **conflict of interests** will be excluded by us.

We consider that a conflict of interest exists, if an expert:

- was involved in the preparation of a proposal;
- benefits directly or indirectly if a proposal is accepted;
- has a close family or personal relationship with any person representing an applicant;
- is a director, trustee or partner or is in any way involved in the management of an applicant;
- is employed or contracted by one of the applicants or any named subcontractors;

Such an expert may, however, exceptionally be invited to take part in the evaluation session, if all of the following apply:

- the expert works in a different department/laboratory/institute from where the action is to be carried out
- the bodies operate with a high degree of autonomy and
- such a role is justified by the requirement to appoint the best available experts and by the limited size of the pool of qualified experts (and this is documented).
- is a member of an advisory group set up by the FCH2 JU to advise on the preparation of work plans;
- is a National Contact Point;
- is a member of a H2020 programme committee;

We decide whether a conflict of interest exists — taking account of the objective circumstances, available

information and related risks — when an expert:

- was employed by one of the applicants in the last three years;
- is involved in a contract or grant agreement, grant decision, membership of management structures (e.g. member of *management or advisory board etc.*) or research collaboration with an applicant or a fellow researcher, or had been so in the last three years
- is in any other situation that could cast doubt on their ability to participate in the evaluation of the proposal impartially, or that could reasonably appear to do so in the eyes of an external third party.

We will publish on the [“Reference Documents” page of the Participant Portal](#) at least once a year the list of experts who have assisted us (integrated into the H2020 experts list) together with their area of expertise.

II.1.3 Award criteria — Scoring — Thresholds

Your proposal will be evaluated against the following **award criteria**:

- excellence,
- impact and
- quality and efficiency of implementation

and according to the **weighting** and **thresholds** that are set out in the FCH2 JU Annual Work Plan ([General Annex F](#) to the work plan).

In order to be considered for funding, your proposal must score above a certain threshold for each criterion, and above an overall threshold.

Thresholds may vary according to the work programme.

For each criterion, your proposal will be given **scores** of 0 to 5 (half marks are possible), as follows:

- 0 — The proposal fails to address the criterion or cannot be assessed due to missing or incomplete information (unless the result of an 'obvious clerical error');
- 1 — Poor: the criterion is inadequately addressed or there are serious inherent weaknesses;
- 2 — Fair: the proposal broadly addresses the criterion but there are significant weaknesses;
- 3 — Good: the proposal addresses the criterion well but with a number of shortcomings;
- 4 — Very good: the proposal addresses the criterion very well but with a small number of shortcomings;
- 5 — Excellent: the proposal successfully addresses all relevant aspects of the criterion; any shortcomings are minor.

The maximum overall score is therefore 15.

Exception: If the work plan/call provides for a weighting factor, this will be used to determine the final ranking.

- ⚠ Proposals will be evaluated on their own merit, and not their potential should certain changes be made. Proposals with an inflated budget are likely to receive a lower score.

II.1.4 Evaluation process

The evaluation process has **three phases**:

Phase 1 — Individual evaluation

Phase 2 — Consensus group

Phase 3 — Panel review

Before starting the evaluation process, the **experts are briefed** on:

- the evaluation processes and procedures (including selection and award criteria);
 - the content of the R&I topics under consideration;
 - the terms of their contract (*e.g. confidentiality, impartiality, conflicts of interest, completing tasks and approving reports, penalties for non-compliance*);
 - disregarding excess pages;
 - the need to evaluate proposals as they are submitted, rather than their potential should certain changes be made.
- ⚠ In FCH2 JU (under Horizon 2020), there will be no scope for recommending improvements to proposals (including improvements on the budget). In particular, proposals with a significantly inflated budget, taking into account cost efficiency considerations, should receive a lower score and may not pass the thresholds.

Phase 1 — Individual evaluation

Each expert carries out an evaluation and prepares an '**individual evaluation report (IER)**' with comments and scores for each criterion.

They also indicate if the proposal:

- falls entirely outside the scope of the part of the call which they are evaluating or
- involves security issues that will need further scrutiny.

Phase 2 — Consensus group

The individual experts then form a 'consensus group' to come to a common view and agree on comments and scores (in a '**consensus report**').

- ⚠ If you have submitted your proposal to the Commission/FCH2 JU previously under Horizon 2020 or any other programme in the past two years, and if the work programme topics and criteria were comparable, the moderator of the consensus group may give a copy of the previous Evaluation Summary Report (see below) to the experts.

The group has an impartial 'moderator' (normally a FCH2 JU official), who:

- seeks a consensus and
- ensures that proposals are evaluated fairly, in line with the criteria.

If a consensus group cannot reach a common view, the consensus report will set out both the majority view and the dissenting views.

- ⚠ In some cases we may ask additional experts to examine the proposal, to establish whether a clear majority view exists.

Phase 3 — Panel review

Finally, a panel will review all the proposals within a call, or part of a call, to:

- make sure that the consensus groups have been consistent in their evaluations;
- if necessary, propose a new set of marks or comments and
- resolve cases where a minority view was recorded in the consensus report.

There will be **no** panel review:

- the work plan/call provides for an exception;
 - if there are sufficient funds to support all the proposals that passed the relevant thresholds.
- ⚠ There will also be no separate panel review if the same consensus group has examined all the proposals. In this case their final review will be done together with the consensus reports. This is considered to constitute the panel review.

The panel review is guided by a 'panel chairperson' (normally a FCH2 JU official) who must ensure fair and equal treatment of the proposals. A rapporteur (who may also be the chair) may be appointed to draft the panel report.

As part of the panel deliberations, the FCH2 JU may organise **hearings with the applicants** to:

- clarify the proposals and help the panel establish their final assessment and scores or
- improve the experts' understanding of the proposal.

The call documents will indicate if hearings will be organised.

Invitations to hearings are sent only to the coordinators of proposals with consensus scores above the individual and overall thresholds and, in some cases, also to those whose proposals passed the individual thresholds, but fell short of the overall threshold.

Hearings may not be used to modify proposals.

You may only provide explanations and clarifications in response to questions submitted to you in advance.

- ⚠ You may choose not to attend the hearing and to reply only in writing.

The panel may invite additional experts to clarify particular issues requiring specific expertise.

These experts may not take position on the proposal as a whole.

Hearings are usually held in Brussels, but may also be conducted by a written procedure, via telephone, or by video-conference.

The '**panel report**' includes the '**evaluation summary report (ESR)**' for each proposal (based on the consensus report, including comments and scores, and taking into account the panel's deliberations and any new scores or comments considered necessary), with explanations and a list of proposals passing all thresholds, along with a final score, ('**panel ranked list**') and, where necessary, the panel's recommendations for priority order in the event of equal scores, using the procedure set out in the work plan (or General Annexes to the work plan).

- ⚠ You will receive a copy of your evaluation summary report, when you will be informed of the outcome of the evaluation by the experts.

II.2. Outcome of the evaluation: FCH2 JU ranked list — Operational capacity check

We will rank the proposals that passed the thresholds according to the results of the evaluation by the experts ('FCH2 JU ranked list').

This ranked list consists of:

- a main list (proposals proposed for funding)
- normally also a reserve list (in case proposals are withdrawn, excluded or extra funding becomes available), including list of proposals that cannot be funded because of insufficient budget.

In addition, we will make a list of proposals that didn't pass the thresholds or has been found to be ineligible (*e.g. out of scope*).

If — on the basis of this ranking and the available budget — your proposal is on the main list, we will **invite you to the grant preparation stage** (via a 'grant information letter' sent through the electronic exchange system).

 This is not a commitment that we will fund your project.

You will receive this letter within 5 months of the call deadline.

If your proposal is put on a **reserve list**, we will **inform** your coordinator and let him/her know of any subsequent change.

If your **proposal** has **not** been **retained** for funding, we will inform your coordinator (via a 'proposal rejection letter' sent through the electronic exchange system), together with the reasons why and how to appeal.

If the proposal is retained for funding, but **you may not participate** (*e.g. because you are found to have insufficient operational capacity or to be ineligible*), we will inform you and your coordinator (via an 'applicant rejection letter' sent through the electronic exchange system).

II.3 Grant preparation

Rules:

- ✘ Art 19 H2020 FP Reg
- ✘ Art 13(2,3), 14 RfP

II.3.1 Ethics review (ethics screening and ethics assessment)

Summary

This section explains how and why the Commission/FCH2 JU makes an:

- ethics review

Key points

- During proposal submission, you are asked to fill out the ‘ethics self-assessment’ for your proposal.

This consists of:

- the ‘ethics issue table’ in Part A of the [proposal templates](#) and
 - ‘ethics self-assessment’ in Part B of the [proposal templates](#) (i.e. a description of how the identified ethics issue is addressed and how it complies with applicable laws).
- We will check if your proposal **complies with ethical principles** (including research integrity) and **applicable international, EU and national law**.

All proposals will be screened for ethics issues (‘**ethics screening**’).

Proposals raising serious or complex ethics issues must undergo an ‘**ethics assessment**’ (*e.g. proposals involving significant research integrity issues*).

- Proposals that contravene ethical principles may be excluded at any time.

Ethics review

In parallel to the evaluation (or soon after), we will check — with the help of independent ethics experts — if your proposal complies with ethical principles and relevant legislation.

Ethics issues

Although the main focus is on the ethical dimension (*e.g. human rights and protection of human beings, animal protection and welfare, data protection and privacy, environmental protection, malevolent use of research results*), we will also look at ‘research integrity’ issues (*e.g. fabrication, falsification or plagiarism, including misrepresenting credentials and authorship improprieties*).

Ethics review process

The ethics review process has **one or two stages**:

Stage 1 — Ethics screening

Stage 2 — Ethics assessment

All proposals will go through an ethics review process (made up of one or two consecutive steps, depending on whether or not ethics issues are confirmed, whether they are adequately addressed as well as their severity and complexity).

We will start the **ethics screening** by flagging any ethics issues that are not already indicated in the

ethics self-assessment of your proposal and then examine whether they are adequately handled.

Example (ethics issues): impact on human beings, environment or animal welfare; processing of personal data; fabrication and falsification of data (plagiarism).

If your proposal raises serious or complex ethics issues, it will have to also undergo an **ethics assessment** (i.e. a more in-depth analysis).

Example (serious ethics issues that require ethics assessment): severe intervention on humans; multiple and interconnected ethics issues; lack of appropriate ethics framework in the country where the research will be conducted, etc.

 We may contact you during the ethics review, if we need more information or supporting documents.

Outcome of the ethics review: Ethics opinion

The ethics review culminates in one or more **ethics reports** (one for the ethics screening and one for the ethics assessment, if necessary) with an **ethics opinion**.

These ethics reports may:

- grant **ethics clearance** (for proposals that are ‘ethics-ready’, i.e. respect ethical principles and applicable law)
- grant **conditional ethics clearance** (for proposals where the experts make the clearance subject to conditions (i.e. ‘ethics requirements’) to be fulfilled before the signature of the grant agreement or to be included in the grant agreement)

The conditions may include:

- regular reporting
- appointing an independent ethics advisor or board (that may notably be tasked to report to the FCH2 JU on the compliance with the ethics requirements)
- an ethics check or audit
- submission of further information/documents
- necessary adaptation of the methodology to comply with ethical principles and relevant legislation
- recommend an **ethics assessment**, or
- **refuse** ethics clearance.

The reports may also contain ethics recommendations.

 During an ethics assessment, the experts may request a **second ethics assessment**, if they consider that the elements submitted do not allow them to provide an opinion.

If the report is **positive** (clearance or conditional clearance) or recommends an ethics assessment, it will be sent to your coordinator (via the electronic exchange system).

If the report is **negative** (no ethics clearance), we will inform your coordinator (via a ‘proposal rejection letter’ sent through the electronic exchange system), together with the reasons why and how to appeal.

II.3.2 Security scrutiny

Summary

This section explains how and why the FCH2 JU makes a:

- security scrutiny

Key points

- If your project deals with information that is ‘EU-classified’ under the [Commission internal Rules of Procedure](#), we will check how you propose to deal with information.
 - ① *For more information on ‘EU classification’, see the [Guide for classification](#).*
- ⚠ The security scrutiny is not a fully-fledged security check on all potentially security-relevant aspects of a proposal; it is limited to identifying actions that involve security-sensitive information (and classifying them and their deliverables as ‘classified deliverables’).

The security scrutiny does not concern other issues or ‘activities involving dual-use goods or dangerous materials and substances’.
- Security scrutiny will be used for most parts of Societal Challenge 7 — Secure Societies calls, but it may also apply to other proposals.

Security scrutiny

If your proposal deals with information that is ‘EU-classified’ under the [Commission internal Rules of Procedure](#)², it will have to undergo security scrutiny.

Proposals subject to security scrutiny

Your project will be subject to security scrutiny if:

- you declare in the proposal that it is ‘security-sensitive’, i.e. concerns EU-classified information
- the topic is flagged in the FCH2 JU Work Plan as potentially resulting in security-sensitive projects
- the FCH2 JU detects or suspects that:
 - classified information is, or may be, used as background and/or
 - it is planned that some results will be classified.

Documents and information to be provided

Unless you have already included them in your proposal, we will contact you to request the following:

- a ‘Security Aspect Letter (SAL)’ and ‘Security Classification Guide (SCG)’³, covering
 - the level of classification of background information (and the formal written authorisation by the competent security authorities to use this information);
 - the classified results (including which participant will have access to what information).

² Commission Decision 2001/844/EC, ECSC, Euratom amending the Commission’s internal Rules of Procedure (OJ L 317, 3.12.2001, p. 1–55). Available at <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02001D0844-20050202&qid=1395937087333&from=EN>.

³ See Section 27 of Commission Decision 2001/844/EC, ECSC, Euratom. Available at <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006D0548&from=EN>.

- a copy of the ‘Facility Security Clearances (FSC)’ (or of the FSC request).
- ⚠ The validity of the FSC may be checked by the Commission Security Directorate through the appropriate formal channel with the national security authorities (NSAs) involved.

Security scrutiny process

The ‘**security scrutiny committee**’ will check:

- the level of sensitivity of your proposal and
- that you have properly addressed all the security aspects.

This committee will give a **recommendation** on the level of ‘EU classification’ that is necessary.

If classification is required, the Security Aspect Letter (SAL)’ and ‘Security Classification Guide (SCG)’ will become ‘security requirements’ in Annex 1 to the grant agreement. It will be EU-classified at the level of the highest classification of the information used/produced by the action as indicated in the ‘security aspects letter (SAL)’ and ‘security classification guide (SCG)’)

If the proposal is too sensitive to be financed because you do not have the appropriate experience, skills or permissions to guarantee security of the information, we will refuse funding.

If we **refuse funding**, will inform your coordinator (via a ‘proposal rejection letter’ sent through the electronic exchange system), together with the reasons why and how to appeal.

- ⚠ If the reasons for rejection are themselves ‘EU classified’, we cannot include them in the rejection letter.

II.4 How to file a complaint

If you consider that we unduly rejected your proposal, the coordinator may file a **complaint** via the Participant Portal ('formal notifications box').

For specific complaints concerning the **evaluation of your proposal** (see section II.2), the coordinator may — within **30 days** of receiving the proposal rejection letter — file a **request for an evaluation review** via the Participant Portal, using the on-line forms provided.

⚠ The review covers only the procedural aspects of the evaluation, not the merits of the proposal.

If the complaint is justified, we will arrange for a re-evaluation and inform the coordinator.

If the complaint is not justified, we will inform the coordinator, together with the reasons why.