

PROGRAMMA DIRITTI, UGUAGLIANZA E CITTADINANZA

TOPIC: Prevent and combat gender-based violence and violence against children

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Topic Description

Scope:

For the purposes of this call gender-based violence is defined as violence directed against a person because of that person's gender or as violence that affects persons of a particular gender disproportionately.

Violence against children is understood to mean "all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation including sexual abuse" as listed in Article 19(1) of the United Nations Convention on the Rights of the Child (<http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>) and in alignment with the United Nations Committee on the Rights of the Child's General comment No. 13 (2011) on the right of the child to freedom from all forms of violence (http://www2.ohchr.org/english/bodies/crc/docs/CRC.C.GC.13_en.pdf).

1. Priorities

1.1 Prevention of gender-based violence (GBV): The focus is on primary prevention, i.e. changing social attitudes and behaviour, in order to end tolerance of all forms of violence. This involves tackling prejudices and gender stereotypes and norms that encourage or condone violence, as well as preventing victimisation through education about healthy relationships and their rights.

(Indicative amount: 2 500 000 EUR)

1.2 Protection and support for victims of gender-based violence and violence against children, including through tackling under-reporting and promoting multi-disciplinary

cooperation among relevant professionals (For projects relevant to children, see child rights approach definition: paragraph 59 of General Comment No 13 of the UN Committee on the rights of the child).

This priority aims to contribute to the implementation of:

- Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime;
- Directive 2011/99/EU on the European Protection Order; and/or
- Regulation 606/2013 on mutual recognition of protection measures in civil matters

(Indicative amount: 3 206 000 EUR)

1.3 The coordination and/or adaptation of support services for sexual and gender-based violence to include refugees and migrants (children, women, LGBTQI persons, young men and boys), in particular to ensure their recovery from such trauma. The aim is not to create new or parallel services but to adapt them in an inclusive manner. This call will not fund operating or running costs, but is intended to build capacity and adapt frameworks to include people in migration, in a practical way, for example where outreach to new reception facilities and structures are needed or where the involvement of cultural mediators/interpreters could help.

(Indicative amount: 3 000 000 EUR)

1.4 Treatment of perpetrators, in order to prevent reoffending.

The aim is to support the development of perpetrator treatment programmes and capacity-building among professionals working in this area, with the aim of preventing reoffending and further protecting victims.

(Indicative amount: 1 000 000 EUR)

1.5 National coordinating frameworks or action plans for violence against children (supporting Member States and other actors). The aim is to support Member States in developing and implementing national coordinating frameworks to eliminate all forms of violence against children (which would cover a number of different areas and issues), in line with the 10 Principles for integrated child protection systems and taking account of the Council of Europe Policy Guidelines on Integrated National Strategies for the Protection of Children from Violence as well as United Nations Committee on the Rights of the Child General Comment 13 (2011) on the right of the child to freedom from all forms of violence.

(Indicative amount: 3 000 000 EUR)

2. Description of the activities

Project activities may include:

For all priorities:

- mutual learning, exchange of good practices, cooperation
- design and implementation of protocols, development of working methods which may be transferable to other regions or countries
- capacity building and training for professionals

For priorities 1 and 2:

- awareness-raising and education activities

For priority 3:

- empowerment of refugee/migrant communities and efforts to include them in support services
- adaptation of existing services/structures/frameworks/methodology, including outreach to new reception facilities and structures or involvement of new actors (e.g. cultural mediators/interpreters)

For priority 5:

- development or adaptation and/or implementation of national coordinating frameworks or action plans for violence against children, taking account of the different national starting points (See in particular Section VI of GC 13);
- awareness-raising and capacity-building to foster participation and ownership in the development of such national frameworks or action plans in line with paragraph 71 of United Nations Committee on the Rights of the Child, General Comment No 13 (2011, for instance through a multidisciplinary working group which meets regularly and has appropriate decision-making power.

Given the challenges and known gaps in national as well as transnational cooperation and coordination, all proposals submitted under priorities, 2, 3 and 5, should describe how their project would enhance interagency and multidisciplinary cooperation and collaboration, both at national and at transnational levels (e.g. in planning for dealing with cases with crossborder aspects), including across governmental departments, to ensure the closer involvement of relevant authorities, in cooperation with other actors (e.g. civil society, academia, practitioners, etc.). Such frameworks will need to be integrated with other sectoral frameworks.

For priority 5, all proposals will be scrutinised closely and measured against the Council of Europe Policy Guidelines on Integrated National Strategies for the Protection of Children from Violence and United Nations Committee on the Rights of the Child General Comment No 13 (2011) on the right of the child to freedom from all forms of violence. The national starting point(s) and the rationale for project choices must be clearly described. The degree to which the proposal is aligned with these two documents will be evaluated under the award criterion 'a) relevance'.

For priorities 1, 2, 3 and 4, projects are welcome to focus on specific forms of violence or particular groups of victims. Proposals should include justification for these choices, which will be assessed under the award criterion 'a) relevance'.

This call does not aim to fund projects in the areas of:

- conformity assessments of the transposition of Directive on the rights of victims of crime (2012/29/EU) into national law.

The following types of activities will not be funded by the Commission:

- activities supporting individual political parties
- provision of financial support to third parties
- legal actions before national or international courts regardless of their grounds or objectives.

Applicants are invited to take note of previously funded projects:

- <http://ec.europa.eu/justice/grants/results/daphne-toolkit/>;
- http://ec.europa.eu/justice/fundamental-rights/files/rights_child/compilation_previously_funded_projects_rights_of_the_child_and_violence_against_children.pdf;
- and http://ec.europa.eu/justice/grants1/closed-calls/index_en.htm

The continuation or follow-up of successful initiatives, including the scaling up of existing initiatives and/or testing them in a different context, may be funded if it is aligned with one of the priorities. However, the exact duplication of an initiative will not be funded.

Applicants shall explain and demonstrate how their proposals are aligned with the respective EU policies and with the documents published by the European Commission or

referred to below (see bibliography). The degree of relevance to the priorities of the call for proposals will be assessed under the award criterion 'a) relevance'.

For projects in the area of violence against children, projects must take a rights-based approach and be clearly grounded in the EU Charter of Fundamental rights and the UN Convention on the rights of the child (UNCRC). Applicants are required to include clear and explicit references to EU and international law and standards they will adhere to or be guided by in project design, implementation, evaluation and monitoring and explain the project rationale.

This call aims to fund targeted, practical projects ensuring maximum tangible and demonstrable benefits and impacts on the lives of beneficiaries. The projects should be practical projects rather than research and should include a combination of elements to form a coherent whole. All projects should not only develop a sound methodology using recognised existing good practice or tried and tested intervention models but consist of a large proportion of practical implementation measures and outcomes. These aspects will be taken into account when evaluating the quality of proposals. Applicants are invited to consider the weighting of the work streams, with a view to ensuring maximum practical benefits, positive outcomes and impacts for the target groups and the final beneficiaries, and to check that the management and coordination work streams (including travel) are not over-resourced. Activities such as the development of materials, the mapping of existing materials or research should be, at most, minor components of project proposals. If included, the need should be solidly justified in the proposal; they should lead to practical applications and interventions.

For priorities 1, 2, and 4 applicants are, where appropriate and possible, encouraged to embed a "behavioural" approach (for further details please refer to "Applying Behavioural Sciences to EU Policy-making", Joint Research Centre Scientific and Policy Report (2013): <http://ftp.jrc.es/EURdoc/JRC83284.pdf>) in their project, as a solution to the issues at stake often requires behavioural change. Behavioural sciences seek to understand how people make decisions in practice; how their behaviour is influenced by the context in which their decisions are made and how they are likely to respond to certain options. We welcome applications that clearly identify the behavioural element at stake (i.e. the factor(s) that has/have an impact on the target group's decision and behaviour).

Any training and/or practical tools should have an overarching objective to make the system work better to improve outcomes for the beneficiaries. This may include development and delivery of new training modules/tools or roll out and delivery of previously tried and tested training modules/tools. Proposals should describe how access to those to be trained will be assured and describe how training/tools will be rolled out in the participating countries. In terms of promoting sustainability, capacity-building should preferably focus on train-the-trainer approaches and may also include tools such as checklists/draft protocols, etc. For transnational projects, any training modules developed

should be made available with a view to being replicated or adapted for reuse in other EU Member States. New training modules must be piloted and, if necessary, adapted prior to delivery.

All projects for each of the priorities under this call can be either national or transnational and should be elaborated in close partnership with and/or be led by appropriate key players, such as child protection agencies, police, health services, the judiciary, victim support organisations, helplines, refugee and asylum seeker services, social workers, etc. Applicants must document that they have the prior commitment of participating key players. Good quality cooperation among partners will be instrumental in making innovative projects successful. Regardless of whether projects are national or transnational in nature, they should aim to produce results that create or contribute to implementation of standards at European level, or that could be transferable to other Member States.

At least one public authority from each participating country must either be involved in the project (as applicant or co-applicant) or by providing substantial support. For projects related to gender-based violence, these public authorities can be national, regional or local Ministries/agencies/equality bodies responsible for gender equality and/or provision of services to victims of violence or perpetrators; police, judicial, health or education authorities etc., as relevant. For projects related to children, these public authorities can be Ministries and/or agencies responsible for children (e.g. child protection agencies and services, national guardianship institutions, Ministries for children, child protection, education, health, social affairs, justice, children's ombudspersons and/or national human rights institutes for children, responsible regional authorities, etc). The rationale for the choice must be documented and explained in Part B Project Description and Implementation. In practical terms, it means that if, for instance, a transnational project is submitted by a partnership involving four different eligible countries, at least four public authorities as described above (one per each eligible country) must either be involved in the project as applicant or partner(s) or express in writing their support for the application. In the latter case, this support will be expressed through Annex 5 - Letter from the public authority supporting the application. The requirement will be assessed under the award criterion b) quality.

Mainstreaming

Projects funded under this call shall also seek to promote equality between women and men and the rights of the child. Gender and rights of the child mainstreaming means integrating a gender and rights of the child perspective in the design, implementation, monitoring and evaluation of a project, as appropriate. Consequently, when relevant, the applicant shall take the necessary steps to ensure that gender equality and child-related issues are taken into account by paying attention to the situation and particular needs of women and men and of children. It is, for example, essential that projects do not silence, stereotype, stigmatise, lay the blame on or discriminate against women or men. Projects

should contribute to empowering women and to ensuring that they achieve their full potential and enjoy the same rights as men.

All proposals relevant to children are expected to respect the child's right to participate and be aligned with Article 24 of the Charter, relevant EU law and the UN Convention on the rights of the child and describe how they will contribute to the implementation of the 10 principles for integrated child protection systems (see bibliography). The child's right to be heard, as set out in UNCRC Article 12 and General Comment No 12, must be an integral part of all project activities. Proposals must make children's involvement central and integral to the project, for example in designing and reviewing responses to reports and actual cases of child victims, in reviewing services, in assessing what needs to be changed at system level, in empowering children to be involved in decisions that affect them and in empowering children and young people to help themselves and other children, etc. Are there possibilities to involve children in project design prior to submission of proposals? Are the views of children on issues addressed in the call (possibly gathered elsewhere) reflected in the proposal? Accessible guidance on how to ensure child participation is also contained in the Lundy Model of Participation and the Lundy Voice Model Checklist for Participation, designed by Professor Laura Lundy of Queen's University, Belfast (see bibliography).

Projects funded under this call shall also comply with the prohibition of discrimination based on any of the grounds listed in Article 21 of the Charter of Fundamental Rights of the European Union (the "Charter"), in accordance with and within the limits set by Article 51 of the Charter. Among others the Commission encourages applicants to promote equal employment opportunities for all its staff and team. The beneficiary is encouraged to foster an appropriate mix of people, whatever their ethnic origin, religion, age, gender and ability.

Finally, all projects under this call shall respect and shall be implemented in line with the rights and principles enshrined in the Charter.

Child protection/safeguarding policy

If a project will involve direct contact with children, the beneficiaries of funding (including partners) need to provide their child protection/safeguarding policy, if they work directly with children during the project. Each partner must provide their own child protection policy if they will be working directly with children. However, given the subject matter of these calls, for all projects concerning children, child safeguarding must be central to project design and implementation, for example for national coordinating frameworks, and must be addressed. The applicant must describe and submit the child protection/safeguarding policy it will adhere to (see Annex 4 of the Guide for applicants). A child protection policy should include standards that cover four broad areas: (1) policy, (2) people, (3) procedures, and (4) accountability. More information on these areas can be found in "Child safeguarding standards and how to implement them" issued by Keeping Children Safe

(see bibliography). The quality of the applicant's child safeguarding/protection policy will be assessed under award criterion b) quality.

Monitoring and evaluation

Appropriate attention has to be given to developing a robust evidence base and involving reliable monitoring, evaluation and reporting procedures based on recognised methodological approaches, developed by a competent and experienced policy impact evaluator for further details please refer to "Applying Behavioural Sciences to EU Policy-making", Joint Research Centre Scientific and Policy Report (2013): <http://ftp.jrc.es/EURdoc/JRC83284.pdf>), in consultation with the relevant project partners. This should include defining the expected impact of the activity in measurable terms and defining a robust methodology and indicators to measure the impact of the activity. For priorities 1, 2 and 4, this should go beyond simply surveying participants on their appreciation of activities and deliverables, and assess how activities and the use of deliverables have led to attitudinal and behavioural changes among the target group, e.g. there is lower tolerance of gender-based violence and the target group states they are more likely to intervene when witnessing it, or when witnessing a situation that could lead to gender-based violence, victims are more likely to report experiences of violence, the target group uses learned techniques in their daily/working life, etc. Though applicants are free to choose the method for evaluating the impact of the activities, the method should be robust and appropriate, and involve rigorous data collection and monitoring. For priorities 1, 2, 3 and 4, it should provide reliable results on "what works" and "what does not work" (for further details please refer to "Social Experimentation - A methodological guide for policy makers", Written by J-Pal Europe, at the request of Directorate General for Employment, Social Affairs and Inclusion) – see bibliography. Proposals must make provisions to document the number of persons reached, provide anonymised data disaggregated by sex and by age, and must describe in their grant application how this will be done and how the target group will be reached.

Sustainability of projects and dissemination of results

Applications should include a clear communication, dissemination and sustainability plan, with measures to maintain and monitor results after the end of funding. Applicants should also describe the potential for scaling up the measure, should the activities produce the expected results. The projects should aim at ensuring their durability and appropriate dissemination, including at the end of funding (by promoting and enabling access to their results to the widest possible audience).

3. Expected results

- increased reporting of violence to the police and other services, with appropriate mechanisms in place to facilitate this;

- increased capacity of stakeholders and relevant professionals to address issues related to sexual and gender-based violence and violence against children, including through strengthened multiagency cooperation;
- increased number of quality victim support services, including those providing for targeted and integrated support for victims with specific needs, such as victims of sexual violence, victims of violence in close-relationships, providing for trauma support and counselling;
- improved protection and support standards for victims of gender-based violence and violence against children including people in migration;
- increased awareness of sexual and gender-based violence and violence against children, including in the context of migration;
- increased child protection system specialist support for child victims implementing a child-centred and child rights approach;
- changes in attitudes and behaviour as regards the issue of gender-based violence (including lower tolerance and victim-blaming) among the general population and particular groups, e.g. relevant professionals, witnesses and bystanders, vulnerable groups, etc;
- reduced risk of sexual and gender-based violence and violence against children;
- system-strengthening through capacity-building to ensure that structures for the prevention of and responses to violence against women, children and other groups particularly targeted are extended or adapted to also include refugees and migrants;
- expansion/adaptation to ensure a coherent and coordinated approach to the provision of support services for victims of sexual and gender based violence;
- strengthened cooperation and exchange of information between competent European/national/regional/local authorities in relation to sexual and gender-based violence and to violence against children, including in cross-border situations, in line with the 10 Principles for integrated child protection systems;
- better focus on prevention of and responses to violence for people in migration;

- new/reinvigorated/improved national coordinating frameworks for the elimination of all forms of violence against children are aligned with General Comment No 13 of the UN Committee on the rights of the child, and Council of Europe Guidance and reflect the 10 Principles for integrated child protection systems;
- reinvigoration of national focus on the elimination of violence against children;
- improved clarity and transparency in roles and responsibilities for the elimination of violence against children;
- increased capacity of child protection actors to prevent and respond to violence against children in an integrated and multidisciplinary approach;
- national authorities responsible for addressing violence against children are better placed to cooperate and coordinate with their counterparts across the EU;
- effective prevention measures for violence against children are developed and implemented.

4. Bibliography

Behavioural insights and experimentation

"Social Experimentation - A methodological guide for policy makers", Written by J-Pal Europe, at the request of Directorate General for Employment, Social Affairs and Inclusion: <http://ec.europa.eu/social/main.jsp?catId=88&langId=en&furtherEvents=yes&eventsId=790>

"Applying Behavioural Sciences to EU Policy-making", Joint Research Centre Scientific and Policy Report (2013): <http://ftp.jrc.es/EURdoc/JRC83284.pdf>

Joana Sousa Lourenço, Emanuele Ciriolo, Sara Rafael Almeida, and Xavier Troussard. Behavioural insights applied to policy: European Report 2016: <https://ec.europa.eu/jrc/en/research/crosscutting-activities/behavioural-insights>

Sara Rafael Almeida, Joana Sousa Lourenço, Dessart François Jacques, and Emanuele Ciriolo. Insights from behavioural sciences to prevent and combat violence

against women. Literature review (2016) <https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/insights-behavioural-sciences-prevent-and-combat-violence-against-women-literature-review>

Gender equality and violence against women

Policy documents/background information:

DG Justice and Consumers' webpages on gender equality and violence against women:
<http://ec.europa.eu/justice/gender-equality/> <http://ec.europa.eu/justice/saynostopvaw/>

"Strategic engagement for gender equality 2016-2019":
http://ec.europa.eu/justice/gender-equality/files/documents/151203_strategic_engagement_en.pdf

Factsheet summarising key concrete actions aimed at eliminating all forms of violence against women and girls in the EU: http://ec.europa.eu/justice/gender-equality/files/documents/140303_factsheet_vaw_en.pdf

Commission and EEAS Communication "Towards the elimination of female genital mutilation": http://ec.europa.eu/justice/gender-equality/files/gender_based_violence/131125_fgm_communication_en.pdf

Data and reports:

Results of the European Fundamental Rights Agency (FRA) survey on women's experiences of violence: <http://fra.europa.eu/en/publication/2014/violence-against-women-eu-wide-survey-main-results-report>

Results of the European Foundation for the Improvement of Living and Working Conditions (Eurofound)'s European Working Conditions Surveys (EWCS):
<http://www.eurofound.europa.eu/surveys/2015/sixth-european-working-conditions-survey-2015>

Report on "Attitudes Towards Violence Against Women in the EU":
http://ec.europa.eu/justice/gender-equality/files/documents/151125_attitudes_enege_report_en.pdf

Report on "FGM in Europe – An analysis of court cases":
http://ec.europa.eu/justice/gender-equality/files/documents/160205_fgm_europe_enege_report_en.pdf

European Institute for Gender Equality (EIGE)'s studies on gender-based violence:
<http://eige.europa.eu/gender-based-violence/eige-studies>

Eurobarometer on gender-based violence (2016):
<http://ec.europa.eu/COMMMFrontOffice/publicopinion/index.cfm/Survey/getSurveyDetail/yearFrom/1974/yearTo/2016/surveyKy/2115>

Violence against children and rights of the child

EU acquis on the rights of the child: http://ec.europa.eu/justice/fundamental-rights/files/acquis_rights_of_child.pdf (in particular the Victims' rights directive 2012/29/EU Directive 2011/93/EU on child sexual abuse and exploitation and Directive 2011/36/EU on trafficking in human beings)

DG Justice website on rights of the child: http://ec.europa.eu/justice/fundamental-rights/rights-child/index_en.htm;

Ten principles for integrated child protection systems:
http://ec.europa.eu/justice/fundamental-rights/files/2015_forum_roc_background_en.pdf

DG JUSTICE website on child protection systems:
http://ec.europa.eu/justice/fundamental-rights/rights-child/protection-systems/index_en.htm;

Council of Europe Policy Guidelines on Integrated National Strategies for the Protection of Children from Violence:
<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168046d3a0>

UN Convention on the rights of the child:
<http://www.ohchr.org/EN/professionalinterest/pages/crc.aspx>

United Nations Committee on the Rights of the Child General Comment 13 (2011) on the right of the child to freedom from all forms of violence:
http://www2.ohchr.org/english/bodies/crc/docs/CRC.C.GC.13_en.pdf

HUDOC database; case law of the ECtHR:
<http://www.echr.coe.int/Pages/home.aspx?p=caselaw/HUDOC&c>

European Law Handbook on rights of the child: FRA/CoE/ECtHR Handbook on European law relating to rights of the child:
<http://fra.europa.eu/en/publication/2015/handbook-european-law-child-rights>

Council of Europe Convention on the protection of children against sexual exploitation and sexual abuse (the Lanzarote Convention)

Child refugees and migrants

European Commission, DG Justice and Consumers, webpage children in migration:
http://ec.europa.eu/justice/fundamental-rights/rights-child/protection-systems/index_en.htm

European Commission, 10th European Forum on the rights of the child, the protection of children in migration, 28 – 30 November 2016, general background paper (and bibliography with further links)
http://ec.europa.eu/newsroom/document.cfm?doc_id=42359

European Commission, 10th European Forum on the rights of the child, the protection of children in migration, webpage with further details please refer to "Applying Behavioural Sciences to EU Policy-making", Joint Research Centre Scientific and Policy Report (2013): <http://ftp.jrc.es/EURdoc/JRC83284.pdf>, various links (programme, background documents, webstreaming, presentations):
http://ec.europa.eu/newsroom/just/item-detail.cfm?item_id=34456

European Commission, Compilation of data, situation and media reports on children in migration: http://ec.europa.eu/newsroom/document.cfm?doc_id=40299

Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action:
http://gbvguidelines.org/wp-content/uploads/2015/09/2015-IASC-Gender-based-Violence-Guidelines_lo-res.pdf

Compilation of previously funded projects violence against children/rights of the child

Compilation previously funded projects on violence against children and the rights of the child, 2013 – present: http://ec.europa.eu/justice/fundamental-rights/files/rights_child/compilation_previously_funded_projects_rights_of_the_child_and_violence_against_children.pdf

Child participation

Commission study evaluating legislation, policy and practice on child participation in EU28: Final report - Children and young people's summary - Research summary - Resource catalogue - Reports for each of the 28 Member States

Inclusion Europe participation rights children with disabilities
http://www.childrights4all.eu/?page_id=114

Welsh examples cited above: http://www.ssiacymru.org.uk/home.php?page_id=4769
and <http://www.participationworkerswales.org.uk/>

Laura, Lundy (2007) "'Voice" is not enough: conceptualising Article 12 of the United Nations Convention on the Rights of the Child', British Educational Research Journal, 33:6, 927- 942

Lundy Model of Participation and Lundy Voice Model Checklist:
http://ec.europa.eu/justice/fundamental-rights/files/lundy_model_child_participation.pdf

Ireland, Department of Children and Youth Affairs, National Strategy on Children and Young People's Participation in Decision-Making 2015-2020 (17 June 2015), p. 21-22.
Accessible here:

<http://dcya.gov.ie/documents/playandrec/20150617NatStratParticipationReport.pdf> and
Lundy Model of Participation and Lundy Voice Model Checklist:
http://ec.europa.eu/justice/fundamental-rights/files/lundy_model_child_participation.pdf

Child safeguarding policies

Keeping Children Safe standards: http://ec.europa.eu/justice/fundamental-rights/files/rights_child/standards_child_protection_kcsc_en.pdf

Topic conditions

Please read carefully all provisions below before the preparation of your application.

List of eligible countries

The Member States (MS) of the European Union (EU), including their overseas departments, and Iceland

Eligibility and admissibility conditions

2.1 Admissibility requirements are described under point 1 of part C of the Guide for applicants

2.2 Eligibility of the applicant and of the partners

Applicants and co-applicants must be public entities or private organisations, duly established in one of the countries participating in the Programme, or international organisations. Organisations which are profit-oriented must submit applications in partnership with public entities or private non-profit-oriented organisations.

2.3 Eligibility of the application

- (a) The project can be either national or transnational;
- (b) The application must involve at least two organisations (applicant and partner);
- (c) The EU grant applied for cannot be lower than EUR 75 000.