



EUROPEAN COMMISSION
Directorate General Justice and Consumers
Programme and Financial management



GRANT AGREEMENT

NUMBER — 847643 — HC

This **Agreement** ('the Agreement') is **between** the following parties:

on the one part,

the **European Union** ('the EU'), represented by the European Commission ('the Commission'),

represented for the purposes of signature of this Agreement by Daniela BANKIER, Head of Unit, Directorate-General for Justice and Consumers, Programme and Financial management,

and

on the other part,

1. 'the coordinator':

MINISTRY OF JUSTICE, TRANSPARENCY AND HUMAN RIGHTS (GMJ), established in MESOGEION 96, ATHENS 11527, Greece, represented for the purposes of signing the Agreement by Head of NSRF of the Ministry of Justice, Transparency and HR, Ioannis Kokaras

and the following other beneficiaries, if they sign their 'Accession Form' (see Annex 3 and Article 40):

2. **HELLENIC PARLIAMENT (EPIS)**, established in Vassilissis Sofias 11, Athens 106 71, Greece,

3. **PANTEIO PANEPISTIMIO KOINONIKON KAIPOLITIKON EPISTIMON (UPSPS)**, established in ODOS SYNGROU 136, KALLITHEA ATHINA 176 71, Greece, VAT number: EL090015175,

Unless otherwise specified, references to 'beneficiary' or 'beneficiaries' include the coordinator.

The parties referred to above have agreed to enter into the Agreement under the terms and conditions below.

By signing the Agreement or the Accession Form, the beneficiaries accept the grant and agree to implement the action under their own responsibility and in accordance with the Agreement, with all the obligations and conditions it sets out.

The Agreement is composed of:

Terms and Conditions

- | | |
|---------|---|
| Annex 1 | Description of the action |
| Annex 2 | Estimated budget for the action |
| | Annex 2a Not applicable |
| Annex 3 | Accession Forms |
| Annex 4 | Model for the financial statements |
| Annex 5 | Model for the certificate on the financial statements (CFS) |
| Annex 6 | Not applicable |

TERMS AND CONDITIONS

TABLE OF CONTENTS

CHAPTER 1 GENERAL	8
ARTICLE 1 — SUBJECT OF THE AGREEMENT	8
CHAPTER 2 ACTION	8
ARTICLE 2 — ACTION TO BE IMPLEMENTED	8
ARTICLE 3 — DURATION AND STARTING DATE OF THE ACTION	8
ARTICLE 4 — ESTIMATED BUDGET AND BUDGET TRANSFERS	8
4.1 Estimated budget	8
4.2 Budget transfers	8
CHAPTER 3 GRANT	8
ARTICLE 5 — GRANT AMOUNT, FORM OF GRANT, REIMBURSEMENT RATE AND FORMS OF COSTS	8
5.1 Maximum grant amount	8
5.2 Form of grant, reimbursement rates and forms of costs	9
5.3 Final grant amount — Calculation	9
5.4 Revised final grant amount — Calculation	10
ARTICLE 6 — ELIGIBLE AND INELIGIBLE COSTS	11
6.1 General conditions for costs to be eligible	11
6.2 Specific conditions for costs to be eligible	12
6.3 Conditions for costs of affiliated entities to be eligible	14
6.4 Ineligible costs	14
6.5 Consequences of declaration of ineligible costs	15
CHAPTER 4 RIGHTS AND OBLIGATIONS OF THE PARTIES	15
SECTION 1 RIGHTS AND OBLIGATIONS RELATED TO IMPLEMENTING THE ACTION	15
ARTICLE 7 — GENERAL OBLIGATION TO PROPERLY IMPLEMENT THE ACTION	15
7.1 General obligation to properly implement the action	16
7.2 Consequences of non-compliance	16
ARTICLE 8 — RESOURCES TO IMPLEMENT THE ACTION — THIRD PARTY INVOLVED IN THE ACTION	16
ARTICLE 8a — IMPLEMENTATION OF ACTION TASKS BY BENEFICIARIES NOT RECEIVING EU FUNDING	16
ARTICLE 9 — PURCHASE OF GOODS, WORKS OR SERVICES	16

9.1 Rules for purchasing goods, works or services	16
9.2 Consequences of non-compliance	17
ARTICLE 10 — IMPLEMENTATION OF ACTION TASKS BY SUBCONTRACTORS	17
10.1 Rules for subcontracting action tasks	17
10.2 Consequences of non-compliance	18
ARTICLE 11 — IMPLEMENTATION OF ACTION TASKS BY AFFILIATED ENTITIES	18
ARTICLE 11a — FINANCIAL SUPPORT TO THIRD PARTIES	18
11a.1 Rules for providing financial support to third parties	18
11a.2 Financial support in the form of prizes	18
11a.3 Consequences of non-compliance	18
SECTION 2 RIGHTS AND OBLIGATIONS RELATED TO THE GRANT ADMINISTRATION	18
ARTICLE 12 — GENERAL OBLIGATION TO INFORM	18
12.1 General obligation to provide information upon request	18
12.2 Obligation to keep information up to date and to inform about events and circumstances likely to affect the Agreement	19
12.3 Consequences of non-compliance	19
ARTICLE 13 — KEEPING RECORDS — SUPPORTING DOCUMENTATION	19
13.1 Obligation to keep records and other supporting documentation	19
13.2 Consequences of non-compliance	20
ARTICLE 14 — SUBMISSION OF DELIVERABLES	20
14.1 Obligation to submit deliverables	20
14.2 Consequences of non-compliance	21
ARTICLE 15 — REPORTING — PAYMENT REQUESTS	21
15.1 Obligation to submit reports	21
15.2 Reporting periods	21
15.2a Request(s) for further pre-financing payment(s)	21
15.3 Periodic reports — Requests for interim payments	21
15.4 Final report — Request for payment of the balance	21
15.5 Information on cumulative expenditure incurred	22
15.6 Currency for financial statements and conversion into euro	22
15.7 Language of reports	23
15.8 Consequences of non-compliance	23
ARTICLE 16 — PAYMENTS AND PAYMENT ARRANGEMENTS	23
16.1 Payments to be made	23

16.2 Pre-financing payment(s) — Amount	23
16.3 Interim payments — Amount — Calculation	23
16.4 Payment of the balance — Amount — Calculation	24
16.5 Notification of amounts due	24
16.6 Currency for payments	24
16.7 Payments to the coordinator — Distribution to the beneficiaries	24
16.8 Bank account for payments	25
16.9 Costs of payment transfers	25
16.10 Date of payment	25
16.11 Consequences of non-compliance	25
ARTICLE 17 — CHECKS, REVIEWS, AUDITS AND INVESTIGATIONS — EXTENSION OF FINDINGS	26
17.1 Checks, reviews and audits by the Commission	26
17.2 Investigations by the European Anti-Fraud Office (OLAF)	28
17.3 Checks and audits by the European Court of Auditors (ECA)	28
17.4 Checks, reviews, audits and investigations for international organisations	28
17.5 Consequences of findings in checks, reviews, audits and investigations — Extension of findings	28
17.6 Consequences of non-compliance	30
ARTICLE 18 — EVALUATION OF THE IMPACT OF THE ACTION	30
18.1 Right to evaluate the impact of the action	30
18.2 Consequences of non-compliance	30
SECTION 3 OTHER RIGHTS AND OBLIGATIONS	30
ARTICLE 19 — PRE-EXISTING RIGHTS AND OWNERSHIP OF THE RESULTS (INCLUDING INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS)	31
19.1 Pre-existing rights and access rights to pre-existing rights	31
19.2 Ownership of results and rights of use	31
19.3 Consequences of non-compliance	31
ARTICLE 20 — CONFLICT OF INTERESTS	31
20.1 Obligation to avoid a conflict of interests	31
20.2 Consequences of non-compliance	31
ARTICLE 21 — CONFIDENTIALITY	32
21.1 General obligation to maintain confidentiality	32
21.2 Consequences of non-compliance	32
ARTICLE 22 — PROMOTING THE ACTION — VISIBILITY OF EU FUNDING	32

22.1 Communication activities by the beneficiaries	32
22.2 Communication activities by the Commission	33
22.3 Consequences of non-compliance	34
ARTICLE 23 — PROCESSING OF PERSONAL DATA	34
23.1 Processing of personal data by the Commission	34
23.2 Processing of personal data by the beneficiaries	34
23.3 Consequences of non-compliance	35
ARTICLE 24 — ASSIGNMENTS OF CLAIMS FOR PAYMENT AGAINST THE COMMISSION	35
CHAPTER 5 DIVISION OF BENEFICIARIES' ROLES AND RESPONSIBILITIES	35
ARTICLE 25 — DIVISION OF BENEFICIARIES' ROLES AND RESPONSIBILITIES	35
25.1 Roles and responsibilities towards the Commission	35
25.2 Internal division of roles and responsibilities	35
25.3 Internal arrangements between beneficiaries — Consortium agreement	36
CHAPTER 6 REJECTION OF COSTS — REDUCTION OF THE GRANT — RECOVERY — SANCTIONS — DAMAGES — SUSPENSION — TERMINATION — FORCE MAJEURE	37
SECTION 1 REJECTION OF COSTS — REDUCTION OF THE GRANT — RECOVERY — SANCTIONS	37
ARTICLE 26 — REJECTION OF INELIGIBLE COSTS	37
26.1 Conditions	37
26.2 Ineligible costs to be rejected — Calculation — Procedure	37
26.3 Effects	37
ARTICLE 27 — REDUCTION OF THE GRANT	37
27.1 Conditions	38
27.2 Amount to be reduced — Calculation — Procedure	38
27.3 Effects	38
ARTICLE 28 — RECOVERY OF UNDUE AMOUNTS	38
28.1 Amount to be recovered — Calculation — Procedure	38
ARTICLE 29 — ADMINISTRATIVE SANCTIONS	41
SECTION 2 LIABILITY FOR DAMAGES	41
ARTICLE 30 — LIABILITY FOR DAMAGES	41
30.1 Liability of the Commission	41
30.2 Liability of the beneficiaries	41
SECTION 3 SUSPENSION AND TERMINATION	41
ARTICLE 31 — SUSPENSION OF PAYMENT DEADLINE	41
31.1 Conditions	41

31.2 Procedure	41
ARTICLE 32 — SUSPENSION OF PAYMENTS	42
32.1 Conditions	42
32.2 Procedure	42
ARTICLE 33 — SUSPENSION OF THE ACTION IMPLEMENTATION	43
33.1 Suspension of the action implementation, by the beneficiaries	43
33.2 Suspension of the action implementation, by the Commission	43
ARTICLE 34 — TERMINATION OF THE AGREEMENT OR OF THE PARTICIPATION OF ONE OR MORE BENEFICIARIES	44
34.1 Termination of the Agreement, by the beneficiaries	45
34.2 Termination of the participation of one or more beneficiaries, by the beneficiaries	45
34.3 Termination of the Agreement or of the participation of one or more beneficiaries, by the Commission	46
SECTION 4 FORCE MAJEURE	49
ARTICLE 35 — FORCE MAJEURE	49
CHAPTER 7 FINAL PROVISIONS	50
ARTICLE 36 — COMMUNICATION BETWEEN THE PARTIES	50
36.1 Form and means of communication	50
36.2 Date of communication	50
36.3 Addresses for communication	51
ARTICLE 37 — INTERPRETATION OF THE AGREEMENT	51
37.1 Precedence of the Terms and Conditions over the Annexes	51
37.2 Privileges and immunities	51
ARTICLE 38 — CALCULATION OF PERIODS, DATES AND DEADLINES	51
ARTICLE 39 — AMENDMENTS TO THE AGREEMENT	51
39.1 Conditions	51
39.2 Procedure	52
ARTICLE 40 — ACCESSION TO THE AGREEMENT	52
40.1 Accession of the beneficiaries mentioned in the Preamble	52
40.2 Addition of new beneficiaries	53
ARTICLE 41 — APPLICABLE LAW AND SETTLEMENT OF DISPUTES	53
41.1 Applicable law	53
41.2 Dispute settlement	53
ARTICLE 42 — ENTRY INTO FORCE OF THE AGREEMENT	54

CHAPTER 1 GENERAL

ARTICLE 1 — SUBJECT OF THE AGREEMENT

This Agreement sets out the rights and obligations and the terms and conditions applicable to the grant awarded to the beneficiaries for implementing the action set out in Chapter 2.

CHAPTER 2 ACTION

ARTICLE 2 — ACTION TO BE IMPLEMENTED

The grant is awarded for the action entitled ‘**Developing a comprehensive strategy against racism, intolerance and hate crime — HC**’ (‘**action**’), as described in Annex 1.

ARTICLE 3 — DURATION AND STARTING DATE OF THE ACTION

The duration of the action will be **24 months** as of 01/10/2019 (‘**starting date of the action**’).

ARTICLE 4 — ESTIMATED BUDGET AND BUDGET TRANSFERS

4.1 Estimated budget

The ‘**estimated budget**’ for the action is set out in Annex 2.

It contains the estimated eligible costs and the forms of costs, broken down by beneficiary and budget category (see Articles 5, 6).

4.2 Budget transfers

The estimated budget breakdown indicated in Annex 2 may be adjusted — without an amendment (see Article 39) — by transfers of amounts between beneficiaries, budget categories and/or forms of costs set out in Annex 2, if the action is implemented as described in Annex 1.

However :

- the beneficiaries may not add costs relating to subcontracts not provided for in Annex 1, unless such additional subcontracts are approved by an amendment or in accordance with Article 10;
- the transfers between budget categories must stay below 20% of the total costs for the action set out in Annex 2, unless they are approved by an amendment.

CHAPTER 3 GRANT

ARTICLE 5 — GRANT AMOUNT, FORM OF GRANT, REIMBURSEMENT RATE AND FORMS OF COSTS

5.1 Maximum grant amount

The ‘**maximum grant amount**’ is **EUR 189,648.51** (one hundred and eighty nine thousand six hundred and forty eight EURO and fifty one eurocents).

5.2 Form of grant, reimbursement rate and forms of costs

The grant reimburses **80%** of the action’s eligible costs (see Article 6) (‘**reimbursement of eligible costs grant**’) (see Annex 2).

The estimated eligible costs of the action are **EUR 237,060.64** (two hundred and thirty seven thousand sixty EURO and sixty four eurocents).

Eligible costs (see Article 6) must be declared under the following forms (‘**forms of costs**’ or ‘**cost forms**’):

- (a) for **direct personnel costs**: as actually incurred costs (‘**actual costs**’)
- (b) for **direct travel and subsistence costs**: as actually incurred costs (**actual costs**);
- (c) for **direct costs of subcontracting**: as actually incurred costs (**actual costs**);
- (d) for direct costs of **providing financial support to third parties**: not applicable;
- (e) for **other direct costs**: as actually incurred costs (‘**actual costs**’);
- (f) for **indirect costs**: on the basis of a flat-rate applied as set out in Article 6.2.Point F (‘**flat-rate costs**’);

5.3 Final grant amount — Calculation

The ‘**final grant amount**’ depends on the actual extent to which the action is implemented in accordance with the Agreement’s terms and conditions.

This amount is calculated by the Commission — when the payment of the balance is made — in the following steps:

- Step 1 – Application of the reimbursement rate to the eligible costs
- Step 2 – Limit to the maximum grant amount
- Step 3 – Reduction due to the no-profit rule
- Step 4 – Reduction due to substantial errors, irregularities or fraud or serious breach of obligations

5.3.1 Step 1 — Application of the reimbursement rate to the eligible costs

The reimbursement rate (see Article 5.2) is applied to the eligible costs (actual costs and flat-rate costs; see Article 6) declared by the beneficiaries (see Article 15) and approved by the Commission (see Article 16).

5.3.2 Step 2 — Limit to the maximum grant amount

If the amount obtained following Step 1 is higher than the maximum grant amount set out in Article 5.1, it will be limited to the latter.

5.3.3 Step 3 — Reduction due to the no-profit rule

The grant must not produce a profit.

‘**Profit**’ means the surplus of the amount obtained following Steps 1 and 2 plus the action’s total receipts, over the action’s total eligible costs.

The ‘**action’s total eligible costs**’ are the consolidated total eligible costs approved by the Commission.

The ‘**action’s total receipts**’ are the consolidated total receipts generated during its duration (see Article 3).

The following are considered **receipts**:

- (a) income generated by the action;
- (b) financial contributions given by third parties to the beneficiary, specifically to be used for costs that are eligible under the action.

The following are however **not** considered receipts:

- (a) financial contributions by third parties, if they may be used to cover costs other than the eligible costs (see Article 6);
- (b) financial contributions by third parties with no obligation to repay any amount unused at the end of the period set out in Article 3.

If there is a profit, it will be deducted in proportion to the final rate of reimbursement of the eligible actual costs approved by the Commission (as compared to the amount calculated following Steps 1 and 2).

5.3.4 Step 4 — Reduction due to substantial errors, irregularities or fraud or serious breach of obligations

If the grant is reduced (see Article 27), the Commission will calculate the reduced grant amount by deducting the amount of the reduction (calculated in proportion to the seriousness of the errors, irregularities or fraud or breach of obligations, in accordance with Article 27.2) from the maximum grant amount set out in Article 5.1.

The final grant amount will be the lower of the following two:

- the amount obtained following Steps 1 to 3 or
- the reduced grant amount following Step 4.

5.4 Revised final grant amount — Calculation

If — after the payment of the balance (in particular, after checks, reviews, audits or investigations;

see Article 17) — the Commission rejects costs (see Article 26) or reduces the grant (see Article 27), it will calculate the ‘**revised final grant amount**’ for the action or for the beneficiary concerned.

This amount is calculated by the Commission on the basis of the findings, as follows:

- in case of **rejection of costs**: by applying the reimbursement rate to the *revised* eligible costs approved by the Commission for the beneficiary concerned;
- in case of **reduction of the grant**: by deducting the amount of the reduction (calculated in proportion to the seriousness of the substantial errors, irregularities or fraud or breach of obligations, in accordance with Article 27.2) from the maximum grant amount set out in Article 5.1 or from the maximum EU contribution indicated for the beneficiary in the estimated budget (see Annex 2).

In case of **rejection of costs and reduction of the grant**, the revised final grant amount will be the lower of the two amounts above.

ARTICLE 6 — ELIGIBLE AND INELIGIBLE COSTS

6.1 General conditions for costs to be eligible

‘**Eligible costs**’ are costs that meet the following criteria:

(a) for **actual costs**:

- (i) they must be actually incurred by the beneficiary;
- (ii) they must be incurred in the period set out in Article 3, with the exception of costs relating to the submission of the final report (see Article 15);
- (iii) they must be indicated in the estimated budget set out in Annex 2;
- (iv) they must be incurred in connection with the action as described in Annex 1 and necessary for its implementation;
- (v) they must be identifiable and verifiable, in particular recorded in the beneficiary’s accounts in accordance with the accounting standards applicable in the country where the beneficiary is established and with the beneficiary’s usual cost accounting practices;
- (vi) they must comply with the applicable national law on taxes, labour and social security, and
- (vii) they must be reasonable, justified and must comply with the principle of sound financial management, in particular regarding economy and efficiency;

(b) for **unit costs**: not applicable;

(c) for **flat-rate costs**:

- (i) they must be calculated by applying the flat-rate set out in Annex 2, and

- (ii) the costs (actual costs) to which the flat-rate is applied must comply with the conditions for eligibility set out in this Article;

(d) for **lump sum costs**: not applicable.

6.2 Specific conditions for costs to be eligible

Costs are eligible if they comply with the general conditions (see above) and the specific conditions set out below, for each of the following budget categories:

- A. direct personnel costs;
- B. direct travel and subsistence costs;
- C. direct costs of subcontracting;
- D. not applicable;
- E. other direct costs.
- F. indirect costs.

‘Direct costs’ are costs that are directly linked to the action implementation and can therefore be attributed to it directly. They must not include any indirect costs (see Point F below).

‘Indirect costs’ are costs that are not directly linked to the action implementation and therefore cannot be attributed directly to it.

A. Direct personnel costs

Types of eligible personnel costs

A.1 Personnel costs are eligible if they are related to personnel working for the beneficiary under an employment contract (or equivalent appointing act) and assigned to the action (**‘costs for employees (or equivalent)’**). They must be limited to salaries, social security contributions, taxes and other costs included in the **remuneration**, if they arise from national law or the employment contract (or equivalent appointing act).

They may also include **additional remuneration** for personnel assigned to the action (including payments on the basis of supplementary contracts regardless of their nature), if:

- (a) it is part of the beneficiary’s usual remuneration practices and is paid in a consistent manner whenever the same kind of work or expertise is required;
- (b) the criteria used to calculate the supplementary payments are objective and generally applied by the beneficiary, regardless of the source of funding used.

A.2 The **costs for natural persons working under a direct contract** with the beneficiary other than an employment contract or **seconded by a third party against payment** are eligible personnel costs, if:

- (a) the person works under the beneficiary’s instructions and, unless otherwise agreed with the beneficiary, on the beneficiary’s premises;
- (b) the result of the work carried out belongs to the beneficiary, and

- (c) the costs are not significantly different from those for personnel performing similar tasks under an employment contract with the beneficiary.

Calculation

Personnel costs must be calculated by the beneficiaries as follows:

{hourly rate
multiplied by
number of actual hours worked on the action}.

The number of actual hours declared for a person must be identifiable and verifiable (see Article 13).

The total number of hours declared in EU or Euratom grants, for a person for a year, cannot be higher than the annual productive hours used for the calculations of the hourly rate. Therefore, the maximum number of hours that can be declared for the grant are:

{number of annual productive hours for the year (see below)
minus
total number of hours declared by the beneficiary, for that person for that year, for other EU or Euratom grants}.

The ‘**hourly rate**’ is the calculated as follows:

{actual annual personnel costs for the person
divided by
number of individual annual productive hours}.

using the personnel costs and the number of annual productive hours for each full financial year covered by the reporting period concerned. If a financial year is not closed at the end of the reporting period, the beneficiaries must use the hourly rate of the last closed financial year available.

The ‘number of individual annual productive hours’ is the total actual hours worked by the person in the year. It may not include holidays and other absences (such as sick leave, maternity leave, special leave, etc). However, it may include overtime and hours spent in meetings, trainings and other similar activities.

B. Direct travel and subsistence costs

Travel and subsistence costs (including related duties, taxes and charges, such as non-deductible value added tax (VAT) paid by beneficiaries that are not public bodies acting as public authority) are eligible if they are in line with the beneficiary’s usual practices on travel.

C. Direct costs of subcontracting (including related duties, taxes and charges, such as non-deductible value added tax (VAT) paid by beneficiaries that are not public bodies acting as public authority) are eligible if the conditions in Article 10.1.1 are met.

D. Direct costs of providing financial support to third parties

Not applicable

E. Other direct costs

E.1 The **depreciation costs of equipment, infrastructure or other assets** (new or second-hand) as recorded in the beneficiary's accounts are eligible, if they were purchased in accordance with Article 9.1.1 and written off in accordance with international accounting standards and the beneficiary's usual accounting practices.

The **costs of renting or leasing** equipment, infrastructure or other assets (including related duties, taxes and charges, such as non-deductible value added tax (VAT) paid by beneficiaries that are not public bodies acting as public authority) are also eligible, if they do not exceed the depreciation costs of similar equipment, infrastructure or assets and do not include any financing fees.

The only portion of the costs that will be taken into account is that which corresponds to the duration of the action and rate of actual use for the purposes of the action.

E.2 **Costs of other goods and services** (including related duties, taxes and charges, such as non-deductible value added tax (VAT) paid by beneficiaries that are not public bodies acting as public authority) are eligible, if they are purchased specifically for the action and in accordance with Article 9.1.1.

Such goods and services include, for instance, consumables and supplies, dissemination, protection of results, certificates on the financial statements (if they are required by the Agreement), translations and publications.

F. Indirect costs

Indirect costs are eligible if they are declared on the basis of the flat-rate of 7% of the eligible direct costs (see Article 5.2 and Points A to E above).

Beneficiaries receiving an operating grant¹ financed by the EU or Euratom budget cannot declare indirect costs for the period covered by the operating grant.

6.3 Conditions for costs of affiliated entities to be eligible

Not applicable

6.4 Ineligible costs

'**Ineligible costs**' are:

- (a) costs that do not comply with the conditions set out above (Article 6.1 to 6.3), in particular:

¹ For the definition, see Article 121(1)(b) of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council of 25 October 2012 on the financial rules applicable to the general budget of the Union and repealing Council Regulation (EC, Euratom) No 1605/2002 (OJ L 218, 26.10.2012, p.1) ('**Financial Regulation No 966/2012**'): '**operating grant**' means direct financial contribution, by way of donation, from the budget in order to finance the functioning of a body which pursues an aim of general EU interest or has an objective forming part of and supporting an EU policy.

- (i) costs related to return on capital;
 - (ii) debt and debt service charges;
 - (iii) provisions for future losses or debts;
 - (iv) interest owed;
 - (v) doubtful debts;
 - (vi) currency exchange losses;
 - (vii) bank costs charged by the beneficiary's bank for transfers from the Commission;
 - (viii) excessive or reckless expenditure;
 - (ix) deductible VAT;
 - (x) costs incurred during suspension of the implementation of the action (see Article 33);
 - (xi) in-kind contributions provided by third parties;
- (b) costs declared under another EU or Euratom grant (including grants awarded by a Member State and financed by the EU or Euratom budget and grants awarded by bodies other than the Commission for the purpose of implementing the EU or Euratom budget); in particular, indirect costs if the beneficiary is already receiving an operating grant financed by the EU or Euratom budget in the same period;
- (c) costs for staff of a national (or local) administration, for activities that are part of the administration's normal activities (i.e. not undertaken only because of the grant);
- (d) costs (especially travel and subsistence costs) for staff or representatives of EU institutions, bodies or agencies;
- (e) costs for activities that do not take place in one of the eligible countries set out in the call for proposals — unless approved by the Commission.

6.5 Consequences of declaration of ineligible costs

Declared costs that are ineligible will be rejected (see Article 26).

This may also lead to any of the other measures described in Chapter 6.

CHAPTER 4 RIGHTS AND OBLIGATIONS OF THE PARTIES

SECTION 1 RIGHTS AND OBLIGATIONS RELATED TO IMPLEMENTING THE ACTION

ARTICLE 7 — GENERAL OBLIGATION TO PROPERLY IMPLEMENT THE ACTION

7.1 General obligation to properly implement the action

The beneficiaries must implement the action as described in Annex 1 and in compliance with the provisions of the Agreement and all legal obligations under applicable EU, international and national law.

7.2 Consequences of non-compliance

If a beneficiary breaches any of its obligations under this Article, the grant may be reduced (see Article 27).

Such breaches may also lead to any of the other measures described in Chapter 6.

ARTICLE 8 — RESOURCES TO IMPLEMENT THE ACTION — THIRD PARTY INVOLVED IN THE ACTION

The beneficiaries must have the appropriate resources to implement the action.

If it is necessary to implement the action, the beneficiaries may:

- purchase goods, works and services (see Article 9);
- call upon subcontractors to implement action tasks described in Annex 1 (see Article 10).

In these cases, the beneficiaries retain sole responsibility towards the Commission and the other beneficiaries for implementing the action.

ARTICLE 8a — IMPLEMENTATION OF ACTION TASKS BY BENEFICIARIES NOT RECEIVING EU FUNDING

Not applicable

ARTICLE 9 — PURCHASE OF GOODS, WORKS OR SERVICES

9.1 Rules for purchasing goods, works or services

9.1.1 If necessary to implement the action, the beneficiaries may purchase goods, works or services.

The beneficiaries must make such purchases ensuring the best value for money or, if appropriate, the lowest price. In doing so, they must avoid any conflict of interests (see Article 20).

The beneficiaries must ensure that the Commission, the European Court of Auditors (ECA) and the European Anti-Fraud Office (OLAF) can exercise their rights under Articles 17 and 18 also towards their contractors.

9.1.2 Beneficiaries that are ‘contracting authorities’ within the meaning of Directive 2004/18/EC² (or 2014/24/EU³) or ‘contracting entities’ within the meaning of Directive 2004/17/EC⁴ (or 2014/25/EU⁵) must comply with the applicable national law on public procurement.

9.2 Consequences of non-compliance

If a beneficiary breaches any of its obligations under Article 9.1.1, the costs related to the contract concerned will be ineligible (see Article 6) and will be rejected (see Article 26).

If a beneficiary breaches any of its obligations under Article 9.1.2, the grant may be reduced (see Article 27).

Such breaches may also lead to any of the other measures described in Chapter 6.

ARTICLE 10 — IMPLEMENTATION OF ACTION TASKS BY SUBCONTRACTORS

10.1 Rules for subcontracting action tasks

10.1.1 If necessary to implement the action, the beneficiaries may award subcontracts covering the implementation of certain action tasks described in Annex 1.

Subcontracting may cover only a limited part of the action.

The beneficiaries must award the subcontracts ensuring the best value for money or, if appropriate, the lowest price. In doing so, they must avoid any conflict of interests (see Article 20).

The tasks to be implemented and the estimated cost for each subcontract must be set out in Annex 1 and the total estimated costs of subcontracting per beneficiary must be set out in Annex 2. The Commission may however approve subcontracts not set out in Annex 1 and 2 without amendment (see Article 39), if:

- they are specifically justified in the technical report and
- they do not entail changes to the Agreement which would call into question the decision awarding the grant or breach the principle of equal treatment of applicants.

The beneficiaries must ensure that the subcontracted work is performed in one of the eligible countries set out in the call for proposals (‘place of performance obligation’) — unless otherwise approved by the Commission.

² Directive 2004/18/EC of the European Parliament and of the Council of 31 March 2004 on the coordination of procedures for the award of public work contracts, public supply contracts and public service contracts (OJ L 134, 30.04.2004, p. 114).

³ Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC (OJ L 94, 28.3.2014, p. 65).

⁴ Directive 2004/17/EC of the European Parliament and of the Council of 31 March 2004 coordinating the procurement procedures of entities operating in the water, energy, transport and postal services sectors (OJ L 134, 30.04.2004, p. 1).

⁵ Directive 2014/25/EU of the European Parliament and of the Council of 26 February 2014 on procurement by entities operating in the water, energy, transport and postal services sectors and repealing Directive 2004/17/EC (OJ L 94, 28.3.2014, p. 243).

The beneficiaries must ensure that the Commission, the European Court of Auditors (ECA) and the European Anti-Fraud Office (OLAF) can exercise their rights under Articles 17 and 18 also towards their subcontractors.

10.1.2 The beneficiaries must ensure that their obligations under Articles 20, 21, 22 and 30 also apply to the subcontractors.

Beneficiaries that are ‘contracting authorities’ within the meaning of Directive 2004/18/EC (or 2014/24/EU) or ‘contracting entities’ within the meaning of Directive 2004/17/EC (or 2014/25/EU) must comply with the applicable national law on public procurement.

10.2 Consequences of non-compliance

If a beneficiary breaches any of its obligations under Article 10.1.1, the costs related to the subcontract concerned will be ineligible (see Article 6) and will be rejected (see Article 26).

If a beneficiary breaches any of its obligations under Article 10.1.2, the grant may be reduced (see Article 27).

Such breaches may also lead to any of the other measures described in Chapter 6.

ARTICLE 11 — IMPLEMENTATION OF ACTION TASKS BY AFFILIATED ENTITIES

Not applicable

ARTICLE 11a — FINANCIAL SUPPORT TO THIRD PARTIES

11a.1 Rules for providing financial support to third parties

Not applicable

11a.2 Financial support in the form of prizes

Not applicable

11a.3 Consequences of non-compliance

Not applicable

SECTION 2 RIGHTS AND OBLIGATIONS RELATED TO THE GRANT ADMINISTRATION

ARTICLE 12 — GENERAL OBLIGATION TO INFORM

12.1 General obligation to provide information upon request

The beneficiaries must provide — during implementation of the action or afterwards and in accordance with article 25.2 — any information requested in order to verify eligibility of the costs, proper implementation of the action and compliance with the other obligations under the Agreement.

12.2 Obligation to keep information up to date and to inform about events and circumstances likely to affect the Agreement

Each beneficiary must keep information stored in the Participant Portal Beneficiary Register (via the electronic exchange system; see Article 36) up to date, in particular, its name, address, legal representatives, legal form and organisation type.

Each beneficiary must immediately inform the coordinator — which must immediately inform the Commission and the other beneficiaries — of any of the following:

- (a) **events** which are likely to affect significantly or delay the implementation of the action or the EU's financial interests, in particular:
 - (i) changes in its legal, financial, technical, organisational or ownership situation
- (b) **circumstances** affecting:
 - (i) the decision to award the grant or
 - (ii) compliance with requirements under the Agreement.

12.3 Consequences of non-compliance

If a beneficiary breaches any of its obligations under this Article, the grant may be reduced (see Article 27).

Such breaches may also lead to any of the other measures described in Chapter 6.

ARTICLE 13 — KEEPING RECORDS — SUPPORTING DOCUMENTATION

13.1 Obligation to keep records and other supporting documentation

The beneficiaries must — for a period of **five years after the payment of the balance** — keep records and other supporting documentation in order to prove the proper implementation of the action and the costs they declare as eligible.

They must make them available upon request (see Article 12) or in the context of checks, reviews, audits or investigations (see Article 17).

If there are on-going checks, reviews, audits, investigations, litigation or other pursuits of claims under the Agreement (including the extension of findings; see Articles 17), the beneficiaries must keep the records and other supporting documentation until the end of these procedures.

The beneficiaries must keep the original documents. Digital and digitalised documents are considered originals if they are authorised by the applicable national law. The Commission may accept non-original documents if they considers that they offer a comparable level of assurance.

13.1.1 Records and other supporting documentation on the technical implementation

The beneficiaries must keep records and other supporting documentation on the technical implementation of the action, in line with the accepted standards in the respective field.

13.1.2 Records and other documentation to support the costs declared

The beneficiaries must keep the records and documentation supporting the costs declared, in particular the following:

- (a) for **actual costs**: adequate records and other supporting documentation to prove the costs declared, such as contracts, subcontracts, invoices and accounting records. In addition, the beneficiaries' usual cost accounting practices and internal control procedures must enable direct reconciliation between the amounts declared, the amounts recorded in their accounts and the amounts stated in the supporting documentation;
- (b) for **unit costs**: not applicable;
- (c) for **flat-rate costs**: adequate records and other supporting documentation to prove the eligibility of the costs to which the flat-rate is applied. The beneficiaries do not need to identify the costs covered or provide supporting documentation (such as accounting statements) to prove the amount declared at a flat-rate.
- (d) for **lump sum costs**: not applicable.

In addition, for **personnel costs** (declared as actual costs), the beneficiaries must keep **time records** for the number of hours declared. The time records must be in writing and approved by the persons working on the action and their supervisors, at least monthly. In the absence of reliable time records of the hours worked on the action, the Commission may accept alternative evidence supporting the number of hours declared, if it considers that it offers an adequate level of assurance.

As an exception, for **persons working exclusively on the action**, there is no need to keep time records, if the beneficiary signs a **declaration** confirming that the persons concerned have worked exclusively on the action.

13.2 Consequences of non-compliance

If a beneficiary breaches any of its obligations under this Article, costs insufficiently substantiated will be ineligible (see Article 6) and will be rejected (see Article 26), and the grant may be reduced (see Article 27).

Such breaches may also lead to any of the other measures described in Chapter 6.

ARTICLE 14 — SUBMISSION OF DELIVERABLES

14.1 Obligation to submit deliverables

The coordinator must submit:

- a **mid-term progress report** on the implementation of the action, within 30 days after half of the reporting period set out in Article 15.2 has passed;
- the '**deliverables**' identified in Annex 1, in accordance with the timing and conditions set out in it.

14.2 Consequences of non-compliance

If the coordinator breaches any of its obligations under this Article, the Commission may apply any of the measures described in Chapter 6.

ARTICLE 15 — REPORTING — PAYMENT REQUESTS

15.1 Obligation to submit reports

The coordinator must submit to the Commission (see Article 36) the technical and financial report(s) set out in this Article. This report includes the request(s) for payment and must be drawn up using the forms and templates provided in the electronic exchange system (see Article 36).

15.2 Reporting periods

The action has one ‘**reporting period**’:

- RP1: from month 1 to month 24

15.2a Request(s) for further pre-financing payment(s)

Not applicable

15.3 Periodic reports — Requests for interim payments

Not applicable

15.4 Final report — Request for payment of the balance

The coordinator must submit — within 60 days following the end of the reporting period — a final report, which includes the request for payment of the balance.

The **final report** must include the following:

- (a) a ‘**final technical report**’ containing:
 - (i) an **explanation of the work carried out** by the beneficiaries;
 - (ii) an **overview of the implementation** of the action, including milestones and deliverables identified in Annex 1.

This report must include explanations justifying the differences between work expected to be carried out in accordance with Annex 1 and that actually carried out;

- (iii) a summary for publication by the Commission;
 - (iv) the answers to the ‘**questionnaire**’: not applicable;
- (b) a ‘**final financial report**’ containing:

- (i) an **‘individual financial statement’** (see Annex 4) from each beneficiary, for the reporting period.

The individual financial statement must detail the eligible costs (actual costs and flat-rate costs; see Article 6) for each budget category (see Annex 2).

The beneficiaries must declare all eligible costs, even if — for actual costs and flat-rate costs — they exceed the amounts indicated in the estimated budget (see Annex 2). Amounts which are not declared in the individual financial statement will not be taken into account by the Commission.

The individual financial statements must also detail the **receipts of the action** (see Article 5.3.3).

Each beneficiary must **certify** that:

- the information provided is full, reliable and true;
 - the costs declared are eligible (see Article 6);
 - the costs can be substantiated by adequate records and supporting documentation (see Article 13) that will be produced upon request (see Article 12) or in the context of checks, reviews, audits and investigations (see Article 17), and
 - that all the receipts have been declared (see Article 5.3.3);
- (ii) an **explanation of the use of resources** and the information on subcontracting (see Article 10) from each beneficiary, for the reporting period concerned;
- (iii) not applicable;
- (iv) a **‘final summary financial statement’**, created automatically by the electronic exchange system, consolidating the individual financial statement(s) for the reporting period and including the **request for payment of the balance**;
- (v) a **‘certificate on the financial statements’** (drawn up in accordance with Annex 5) for each beneficiary, if:
- it requests an EU contribution of EUR 325 000 or more as reimbursement of actual costs and
 - the maximum EU contribution indicated, for that beneficiary, in the estimated budget (see Annex 2) as reimbursement of actual costs is EUR 750 000 or more.

15.5 Information on cumulative expenditure incurred

Not applicable

15.6 Currency for financial statements and conversion into euro

Financial statements must be drafted in euro.

Beneficiaries with accounting established in a currency other than the euro must convert the costs recorded in their accounts into euro, at the average of the daily exchange rates published in the C series of the *Official Journal of the European Union*, calculated over the corresponding reporting period.

If no daily euro exchange rate is published in the *Official Journal of the European Union* for the currency in question, they must be converted at the average of the monthly accounting rates published on the Commission's website, calculated over the corresponding reporting period.

Beneficiaries with accounting established in euro must convert costs incurred in another currency into euro according to their usual accounting practices.

15.7 Language of reports

All report(s) (including financial statements) must be submitted in the language of the Agreement.

15.8 Consequences of non-compliance

If the report(s) submitted do not comply with this Article, the Commission may suspend the payment deadline (see Article 31) and apply any of the other measures described in Chapter 6.

If the coordinator breaches its obligation to submit the report(s) and if it fails to comply with this obligation within 30 days following a written reminder, the Commission may terminate the Agreement (see Article 34) or apply any of the other measures described in Chapter 6.

ARTICLE 16 — PAYMENTS AND PAYMENT ARRANGEMENTS

16.1 Payments to be made

The following payments will be made to the coordinator:

- a **pre-financing payment**;
- one **payment of the balance**, on the basis of the request for payment of the balance (see Article 15).

16.2 Pre-financing payment(s) — Amount

The aim of the pre-financing is to provide the beneficiaries with a float.

It remains the property of the EU until the payment of the balance.

The amount of the pre-financing payment will be EUR **151,718.81** (one hundred and fifty one thousand seven hundred and eighteen EURO and eighty one eurocents).

The Commission will — except if Article 32 applies — make the pre-financing payment to the coordinator within 30 days from the accession of all beneficiaries to the Agreement (see Article 40).

16.3 Interim payments — Amount — Calculation

Not applicable

16.4 Payment of the balance — Amount — Calculation

The payment of the balance reimburses the remaining part of the eligible costs incurred by the beneficiaries for the implementation of the action.

If the total amount of earlier payments is greater than the final grant amount (see Article 5.3), the payment of the balance takes the form of a recovery (see Article 28).

If the total amount of earlier payments is lower than the final grant amount, the Commission will pay the balance within 90 days from receiving the final report (see Article 15.4), except if Articles 31 or 32 apply.

Payment is subject to the approval of the final report. Its approval does not imply recognition of compliance, authenticity, completeness or correctness of its content.

The **amount due as the balance** is calculated by the Commission by deducting the total amount of pre-financing and interim payments (if any) already made, from the final grant amount determined in accordance with Article 5.3:

$$\begin{aligned} & \{ \text{final grant amount (see Article 5.3)} \\ & \text{minus} \\ & \{ \text{pre-financing and interim payments (if any) made} \} \}. \end{aligned}$$

If the balance is positive, it will be paid to the coordinator.

The amount to be paid may however be offset — without the beneficiaries' consent — against any other amount owed by a beneficiary to the Commission or an executive agency (under the EU or Euratom budget), up to the maximum EU contribution indicated, for that beneficiary, in the estimated budget (see Annex 2).

If the balance is negative, it will be recovered from the coordinator (see Article 28).

16.5 Notification of amounts due

When making payments, the Commission will formally notify to the coordinator the amount due, specifying that it concerns the payment of the balance.

For the payment of the balance, the notification will also specify the final grant amount.

In the case of reduction of the grant or recovery of undue amounts, the notification will be preceded by the contradictory procedure set out in Articles 27 and 28.

16.6 Currency for payments

The Commission will make all payments in euro.

16.7 Payments to the coordinator — Distribution to the beneficiaries

Payments will be made to the coordinator.

Payments to the coordinator will discharge the Commission from its payment obligation.

The coordinator must distribute the payments between the beneficiaries without unjustified delay.

16.8 Bank account for payments

All payments will be made to the following bank account:

Name of bank: BANK OF GREECE

Full name of the account holder: EU FUNDING PROGR IMPLEMENTED OUTSIDE
STRUCTURAL AND INVESTMENT FUNDS

Full account number (including bank codes):

IBAN code: GR8501000130000007100192403

16.9 Costs of payment transfers

The cost of the payment transfers is borne as follows:

- the Commission bears the cost of transfers charged by its bank;
- the beneficiary bears the cost of transfers charged by its bank;
- the party causing a repetition of a transfer bears all costs of the repeated transfer.

16.10 Date of payment

Payments by the Commission are considered to have been carried out on the date when they are debited to its account.

16.11 Consequences of non-compliance

16.11.1 If the Commission does not pay within the payment deadlines (see above), the beneficiaries are entitled to **late-payment interest** at the rate applied by the European Central Bank (ECB) for its main refinancing operations in euros ('reference rate'), plus three and a half points. The reference rate is the rate in force on the first day of the month in which the payment deadline expires, as published in the C series of the *Official Journal of the European Union*.

If the late-payment interest is lower than or equal to EUR 200, it will be paid to the coordinator only upon request submitted within two months of receiving the late payment.

Late-payment interest is not due if all beneficiaries are EU Member States (including regional and local government authorities or other public bodies acting on behalf of a Member State for the purpose of this Agreement).

Suspension of the payment deadline or payments (see Articles 31 and 32) will not be considered as late payment.

Late-payment interest covers the period running from the day following the due date for payment (see above), up to and including the date of payment.

Late-payment interest is not considered for the purposes of calculating the final grant amount.

16.11.2 If the coordinator breaches any of its obligations under this Article, the grant may be reduced (see Article 27) and the Agreement or the participation of the coordinator may be terminated (see Article 34).

Such breaches may also lead to any of the other measures described in Chapter 6.

ARTICLE 17 — CHECKS, REVIEWS, AUDITS AND INVESTIGATIONS — EXTENSION OF FINDINGS

17.1 Checks, reviews and audits by the Commission

17.1.1 Right to carry out checks

The Commission will — during the implementation of the action or afterwards — check the proper implementation of the action and compliance with the obligations under the Agreement, including assessing deliverables and reports.

For this purpose, the Commission may be assisted by external persons or bodies.

The Commission may also request additional information in accordance with Article 12. The Commission may request the beneficiaries to provide such information to it directly.

Information provided must be accurate, precise and complete and in the format requested, including electronic format.

17.1.2 Right to carry out reviews

The Commission may — during the implementation of the action or afterwards — carry out reviews on the proper implementation of the action (including assessment of deliverables and reports) and compliance with the obligations under the Agreement.

Reviews may be started **up to five years after the payment of the balance**. They will be formally notified to the coordinator or beneficiary concerned and will be considered to have started on the date of the formal notification.

If the review is carried out on a third party (see Articles 9 to 11a), the beneficiary concerned must inform the third party.

The Commission may carry out reviews directly (using its own staff) or indirectly (using external persons or bodies appointed to do so). It will inform the coordinator or beneficiary concerned of the identity of the external persons or bodies. They have the right to object to the appointment on grounds of commercial confidentiality.

The coordinator or beneficiary concerned must provide — within the deadline requested — any information and data in addition to deliverables and reports already submitted (including information on the use of resources). The Commission may request beneficiaries to provide such information to it directly.

The coordinator or beneficiary concerned may be requested to participate in meetings, including with external experts.

For **on-the-spot** reviews, the beneficiaries must allow access to their sites and premises, including to external persons or bodies, and must ensure that information requested is readily available.

Information provided must be accurate, precise and complete and in the format requested, including electronic format.

On the basis of the review findings, a '**review report**' will be drawn up.

The Commission will formally notify the review report to the coordinator or beneficiary concerned, which has 30 days to formally notify observations ('**contradictory review procedure**').

Reviews (including review reports) are in the language of the Agreement.

17.1.3 Right to carry out audits

The Commission may — during the implementation of the action or afterwards — carry out audits on the proper implementation of the action and compliance with the obligations under the Agreement.

Audits may be started **up to five years after the payment of the balance**. They will be formally notified to the coordinator or beneficiary concerned and will be considered to have started on the date of the formal notification.

If the audit is carried out on a third party (see Articles 9 to 11 a), the beneficiary concerned must inform the third party.

The Commission may carry out audits directly (using its own staff) or indirectly (using external persons or bodies appointed to do so). It will inform the coordinator or beneficiary concerned of the identity of the external persons or bodies. They have the right to object to the appointment on grounds of commercial confidentiality.

The coordinator or beneficiary concerned must provide — within the deadline requested — any information (including complete accounts, individual salary statements or other personal data) to verify compliance with the Agreement. The Commission may request beneficiaries to provide such information to it directly.

For **on-the-spot** audits, the beneficiaries must allow access to their sites and premises, including to external persons or bodies, and must ensure that information requested is readily available.

Information provided must be accurate, precise and complete and in the format requested, including electronic format.

On the basis of the audit findings, a '**draft audit report**' will be drawn up.

The Commission will formally notify the draft audit report to the coordinator or beneficiary concerned, which has 30 days to formally notify observations ('**contradictory audit procedure**'). This period may be extended by the Commission in justified cases.

The ‘**final audit report**’ will take into account observations by the coordinator or beneficiary concerned. The report will be formally notified to it.

Audits (including audit reports) are in the language of the Agreement.

The Commission may also access the beneficiaries’ statutory records for the periodical assessment of flat-rate amounts.

17.2 Investigations by the European Anti-Fraud Office (OLAF)

Under Regulations No 883/2013⁷ and No 2185/96⁸ (and in accordance with their provisions and procedures), the European Anti-Fraud Office (OLAF) may — at any moment during implementation of the action or afterwards — carry out investigations, including on-the-spot checks and inspections, to establish whether there has been fraud, corruption or any other illegal activity affecting the financial interests of the EU.

17.3 Checks and audits by the European Court of Auditors (ECA)

Under Article 287 of the Treaty on the Functioning of the European Union (TFEU) and Article 161 of the Financial Regulation No 966/2012⁹, the European Court of Auditors (ECA) may — at any moment during implementation of the action or afterwards — carry out audits.

The ECA has the right of access for the purpose of checks and audits.

17.4 Checks, reviews, audits and investigations for international organisations

Not applicable

17.5 Consequences of findings in checks, reviews, audits and investigations — Extension of findings

17.5.1 Findings in this grant

Findings in checks, reviews, audits or investigations carried out in the context of this grant may lead to the rejection of ineligible costs (see Article 26), reduction of the grant (see Article 27), recovery of undue amounts (see Article 28) or to any of the other measures described in Chapter 6.

Rejection of costs or reduction of the grant after the payment of the balance will lead to a revised final grant amount (see Article 5.4).

⁷ Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999 (OJ L 248, 18.09.2013, p. 1).

⁸ Council Regulation (Euratom, EC) No 2185/1996 of 11 November 1996 concerning on-the-spot checks and inspections carried out by the Commission in order to protect the European Communities’ financial interests against fraud and other irregularities (OJ L 292, 15.11.1996, p. 2).

⁹ Regulation (EU, EURATOM) No 966/2012 of the European Parliament and of the Council of 25 October 2012 on the financial rules applicable to the general budget of the Union and repealing Council Regulation (EC, EURATOM) No 1605/2002 (OJ L 298, 26.10.2012, p. 1).

Findings in checks, reviews, audits or investigations may lead to a request for amendment for the modification of Annex 1 (see Article 39).

Checks, reviews, audits or investigations that find systemic or recurrent errors, irregularities, fraud or breach of obligations may also lead to consequences in other EU or Euratom grants awarded under similar conditions (**‘extension of findings from this grant to other grants’**).

Moreover, findings arising from an OLAF investigation may lead to criminal prosecution under national law.

17.5.2 Findings in other grants

The Commission may extend findings from other grants to this grant (**‘extension of findings from other grants to this grant’**), if:

- (a) the beneficiary concerned is found, in other EU or Euratom grants awarded under similar conditions, to have committed systemic or recurrent errors, irregularities, fraud or breach of obligations that have a material impact on this grant and
- (b) those findings are formally notified to the beneficiary concerned — together with the list of grants affected by the findings — **no later than five years after the payment of the balance** of this grant.

The extension of findings may lead to the rejection of costs (see Article 26), reduction of the grant (see Article 27), recovery of undue amounts (see Article 28), suspension of payments (see Article 32), suspension of the action implementation (see Article 33) or termination (see Article 34).

17.5.3 Procedure

The Commission will formally notify the beneficiary concerned the systemic or recurrent errors and its intention to extend these audit findings, together with the list of grants affected.

17.5.3.1 If the findings concern **eligibility of costs**: the formal notification will include:

- (a) an invitation to submit observations on the list of grants affected by the findings;
- (b) the request to submit **revised financial statements** for all grants affected;
- (c) the **correction rate for extrapolation** established by the Commission on the basis of the systemic or recurrent errors, to calculate the amounts to be rejected, if the beneficiary concerned:
 - (i) considers that the submission of revised financial statements is not possible or practicable or
 - (ii) does not submit revised financial statements.

The beneficiary concerned has 90 days from receiving notification to submit observations, revised financial statements or to propose a duly substantiated **alternative correction method**. This period may be extended by the Commission in justified cases.

The Commission may then start a rejection procedure in accordance with Article 26, either on the basis of the revised financial statements, the alternative method or the correction rate announced.

17.5.3.2 If the findings concern **substantial errors, irregularities or fraud or serious breach of obligations**: the formal notification will include:

- (a) an invitation to submit observations on the list of grants affected by the findings and
- (b) the flat-rate the Commission intends to apply according to the principle of proportionality.

The beneficiary concerned has 90 days from receiving notification to submit observations or to propose a duly substantiated alternative flat-rate.

The Commission may then start a reduction procedure in accordance with Article 27, either on the basis of the alternative flat-rate or the flat-rate announced.

17.6 Consequences of non-compliance

If a beneficiary breaches any of its obligations under this Article, any insufficiently substantiated costs will be ineligible (see Article 6) and will be rejected (see Article 26).

Such breaches may also lead to any of the other measures described in Chapter 6.

ARTICLE 18 — EVALUATION OF THE IMPACT OF THE ACTION

18.1 Right to evaluate the impact of the action

The Commission may carry out interim and final evaluations of the impact of the action measured against the objective of the EU programme.

Evaluations may be started during implementation of the action and **up to five years after the payment of the balance**. The evaluation is considered to start on the date of the formal notification to the coordinator or beneficiaries.

The Commission may make these evaluations directly (using its own staff) or indirectly (using external bodies or persons it has authorised to do so).

The coordinator or beneficiaries must provide any information relevant to evaluate the impact of the action, including information in electronic format.

18.2 Consequences of non-compliance

If a beneficiary breaches any of its obligations under this Article, the Commission may apply the measures described in Chapter 6.

SECTION 3 OTHER RIGHTS AND OBLIGATIONS

ARTICLE 19 — PRE-EXISTING RIGHTS AND OWNERSHIP OF THE RESULTS (INCLUDING INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS)

19.1 Pre-existing rights and access rights to pre-existing rights

Where industrial and intellectual property rights (including rights of third parties) exist prior to the Agreement, the beneficiaries must establish a list of these pre-existing industrial and intellectual property rights, specifying the owner and any persons that have a right of use.

The coordinator must — before starting the action — submit this list to the Commission.

Each beneficiary must give the other beneficiaries access to any pre-existing industrial and intellectual property rights needed for the implementation of the action and compliance with the obligations under the Agreement.

19.2 Ownership of results and rights of use

The results of the action (including the reports and other documents relating to it) are owned by the beneficiaries.

The beneficiaries must give the Commission the right to use the results for their communication activities under Article 22.

19.3 Consequences of non-compliance

If a beneficiary breaches any of its obligations under this Article, the grant may be reduced (see Article 27).

Such a breach may also lead to any of the other measures described in Chapter 6.

ARTICLE 20 — CONFLICT OF INTERESTS

20.1 Obligation to avoid a conflict of interests

The beneficiaries must take all measures to prevent any situation where the impartial and objective implementation of the action is compromised for reasons involving economic interest, political or national affinity, family or emotional ties or any other shared interest (**'conflict of interests'**).

They must formally notify to the Commission without delay any situation constituting or likely to lead to a conflict of interests and immediately take all the necessary steps to rectify this situation.

The Commission may verify that the measures taken are appropriate and may require additional measures to be taken by a specified deadline.

20.2 Consequences of non-compliance

If a beneficiary breaches any of its obligations under this Article, the grant may be reduced (see Article 27) and the Agreement may be terminated (see Article 34).

Such breaches may also lead to any of the other measures described in Chapter 6.

ARTICLE 21 — CONFIDENTIALITY

21.1 General obligation to maintain confidentiality

During implementation of the action and **for five years after the payment of the balance**, the parties must keep confidential any data, documents or other material (in any form) that is identified as confidential at the time it is disclosed (**‘confidential information’**).

They may use confidential information to implement the Agreement.

The confidentiality obligations no longer apply if:

- (a) the disclosing party agrees to release the other party;
- (b) the information becomes generally and publicly available, without breaching any confidentiality obligation;
- (c) the disclosure of the confidential information is required by EU or national law.

21.2 Consequences of non-compliance

If a beneficiary breaches any of its obligations under this Article, the grant may be reduced (see Article 27).

Such breaches may also lead to any of the other measures described in Chapter 6.

ARTICLE 22 — PROMOTING THE ACTION — VISIBILITY OF EU FUNDING

22.1 Communication activities by the beneficiaries

22.1.1 General obligation to promote the action and its results

The beneficiaries must promote the action and its results.

22.1.2 Information on EU funding — Obligation and right to use the EU emblem

Unless the Commission requests or agrees otherwise, any communication activity related to the action (including at conferences, seminars, in information material, such as brochures, leaflets, posters, presentations, etc., in electronic form, via social media, etc.) and any infrastructure, equipment or major result funded by the grant must:

- display the EU emblem and
- include the following text:

“This [insert appropriate description, e.g. report, publication, conference, infrastructure, equipment, insert type of result, etc.] was funded by the European Union’s Rights, Equality and Citizenship Programme (2014-2020).”

When displayed in association with another logo, the EU emblem must have appropriate prominence.

For the purposes of their obligations under this Article, the beneficiaries may use the EU emblem without first obtaining approval from the Commission.

This does not, however, give them the right to exclusive use.

Moreover, they may not appropriate the EU emblem or any similar trademark or logo, either by registration or by any other means.

22.1.3 Disclaimer excluding Commission responsibility

Any communication activity related to the action must indicate the following disclaimer:

“The content of this [insert appropriate description, e.g. report, publication, conference, etc.] represents the views of the author only and is his/her sole responsibility. The European Commission does not accept any responsibility for use that may be made of the information it contains.”

22.2 Communication activities by the Commission

22.2.1 Right to use beneficiaries’ materials, documents or information

The Commission may use information relating to the action, documents notably summaries for publication and public deliverables as well as any other material, such as pictures or audio-visual material received from any beneficiary (including in electronic form).

This does not change the confidentiality obligations in Article 21, which still apply.

The right to use a beneficiary’s materials, documents and information includes:

- (a) **use for its own purposes** (in particular, making them available to persons working for the Commission or any other EU institution, body, office or agency or body or institutions in EU Member States; and copying or reproducing them in whole or in part, in unlimited numbers);
- (b) **distribution to the public** (in particular, publication as hard copies and in electronic or digital format, publication on the internet, as a downloadable or non-downloadable file, broadcasting by any channel, public display or presentation, communicating through press information services, or inclusion in widely accessible databases or indexes);
- (c) **editing or redrafting** for communication and publicising activities (including shortening, summarising, inserting other elements (such as meta-data, legends, other graphic, visual, audio or text elements), extracting parts (e.g. audio or video files), dividing into parts, use in a compilation);
- (d) **translation**;
- (e) **giving access in response to individual requests** under Regulation No 1049/2001¹⁰, without the right to reproduce or exploit;
- (f) **storage** in paper, electronic or other form;

¹⁰ Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents, OJ L 145, 31.5.2001, p. 43.

- (g) **archiving**, in line with applicable document-management rules, and
- (h) the right to authorise **third parties** to act on its behalf or sub-license the modes of use set out in Points (b), (c), (d) and (f) to third parties if needed for the communication and publicising activities of the Commission.

If the right of use is subject to rights of a third party (including personnel of the beneficiary), the beneficiary must ensure that it complies with its obligations under this Agreement (in particular, by obtaining the necessary approval from the third parties concerned).

Where applicable (and if provided by the beneficiaries), the Commission will insert the following information:

“© – [year] – [name of the copyright owner]. All rights reserved. Licensed to the European Union (EU) under conditions.”

22.3 Consequences of non-compliance

If a beneficiary breaches any of its obligations under this Article, the grant may be reduced (see Article 27).

Such breaches may also lead to any of the other measures described in Chapter 6.

ARTICLE 23 — PROCESSING OF PERSONAL DATA

23.1 Processing of personal data by the Commission

Any personal data under the Agreement will be processed by the Commission under Regulation No 45/2001¹¹ and according to the ‘notifications of the processing operations’ to the Data Protection Officer (DPO) of the Commission (publicly accessible in the DPO register).

Such data will be processed by the ‘**data controller**’ of the Commission for the purposes of implementing, managing and monitoring the Agreement or protecting the financial interests of the EU or Euratom (including checks, reviews, audits and investigations; see Article 17).

The persons whose personal data are processed have the right to access and correct their own personal data. For this purpose, they must send any queries about the processing of their personal data to the data controller, via the contact point indicated in the privacy statement(s) on the Commission websites.

They also have the right to have recourse at any time to the European Data Protection Supervisor (EDPS).

23.2 Processing of personal data by the beneficiaries

The beneficiaries must process personal data under the Agreement in compliance with applicable EU and national law on data protection (including authorisations or notification requirements).

¹¹ Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data (OJ L 8, 12.01.2001, p. 1).

The beneficiaries may grant their personnel access only to data that is strictly necessary for implementing, managing and monitoring the Agreement.

The beneficiaries must inform the personnel whose personal data are collected and processed by the Commission. For this purpose, they must provide them with the privacy statement(s) (see above), before transmitting their data to the Commission.

23.3 Consequences of non-compliance

If a beneficiary breaches any of its obligations under Article 23.2, the Commission may apply any of the measures described in Chapter 6.

ARTICLE 24 — ASSIGNMENTS OF CLAIMS FOR PAYMENT AGAINST THE COMMISSION

The beneficiaries may not assign any of their claims for payment against the Commission to any third party, except if approved by the Commission on the basis of a reasoned, written request by the coordinator (on behalf of the beneficiary concerned).

If the Commission has not accepted the assignment or the terms of it are not observed, the assignment will have no effect on it.

In no circumstances will an assignment release the beneficiaries from their obligations towards the Commission.

CHAPTER 5 DIVISION OF BENEFICIARIES' ROLES AND RESPONSIBILITIES

ARTICLE 25 — DIVISION OF BENEFICIARIES' ROLES AND RESPONSIBILITIES

25.1 Roles and responsibilities towards the Commission

The beneficiaries have full responsibility for implementing the action and complying with the Agreement.

The beneficiaries are jointly and severally liable for the **technical implementation** of the action as described in Annex 1. If a beneficiary fails to implement its part of the action, the other beneficiaries become responsible for implementing this part (without being entitled to any additional EU funding for doing so), unless the Commission expressly relieves them of this obligation.

The **financial responsibility** of each beneficiary is governed by Articles 28, 29 and 30.

25.2 Internal division of roles and responsibilities

The internal roles and responsibilities of the beneficiaries are divided as follows:

(a) Each **beneficiary** must:

- (i) keep information stored in the Participant Portal Beneficiary Register (via the electronic exchange system) up to date (see Article 12);

- (ii) inform the coordinator immediately of any events or circumstances likely to affect significantly or delay the implementation of the action (see Article 12);
- (iii) submit to the coordinator in good time:
 - individual financial statement(s) for itself and, if required, certificates on the financial statement(s) (see Article 15);
 - the data needed to draw up the technical report(s) (see Article 15);
 - any other documents or information required by the Commission under the Agreement, unless the Agreement requires the beneficiary to submit this information directly.

(b) The **coordinator** must:

- (i) monitor that the action is implemented properly (see Article 7);
- (ii) act as the intermediary for all communications between the beneficiaries and the Commission (in particular, providing the Commission with the information described in Article 12), unless the Agreement specifies otherwise;
- (iii) provide a pre-financing guarantee if requested by the Commission (see Article 16.2);
- (iv) request and review any documents or information required by the Commission and verify their completeness and correctness before passing them on to the Commission;
- (v) submit the deliverables and report(s) to the Commission (see Articles 14 and 15);
- (vi) ensure that all payments are made to the other beneficiaries without unjustified delay (see Article 16);

The coordinator may not subcontract the above-mentioned tasks.

25.3 Internal arrangements between beneficiaries — Consortium agreement

The beneficiaries must have internal arrangements regarding their operation and co-ordination to ensure that the action is implemented properly. These internal arrangements must be set out in a written ‘**consortium agreement**’ between the beneficiaries, which may cover:

- internal organisation of the consortium;
- management of access to the electronic exchange system;
- distribution of EU funding;
- additional rules on rights and obligations related to pre-existing rights and results (see Article 19);
- settlement of internal disputes;

- liability, indemnification and confidentiality arrangements between the beneficiaries.

The consortium agreement must not contain any provision contrary to the Agreement.

CHAPTER 6 REJECTION OF COSTS — REDUCTION OF THE GRANT — RECOVERY — PENALTIES — DAMAGES — SUSPENSION — TERMINATION — FORCE MAJEURE

SECTION 1 REJECTION OF COSTS — REDUCTION OF THE GRANT — RECOVERY — PENALTIES

ARTICLE 26 — REJECTION OF INELIGIBLE COSTS

26.1 Conditions

The Commission will — **at the payment of the balance** or **afterwards** — reject any costs which are ineligible (see Article 6), in particular following checks, reviews, audits or investigations (see Article 17).

The rejection may also be based on the **extension of findings from other grants to this grant** (see Article 17.5.2).

26.2 Ineligible costs to be rejected — Calculation — Procedure

Ineligible costs will be rejected in full.

If the rejection of costs does not lead to a recovery (see Article 28), the Commission will formally notify the coordinator or beneficiary concerned of the rejection of costs, the amounts and the reasons why (if applicable, together with the notification of amounts due; see Article 16.5). The coordinator or beneficiary concerned may — within 30 days of receiving notification — formally notify the Commission of its disagreement and the reasons why.

If the rejection of costs leads to a recovery, the Commission will follow the contradictory procedure with pre-information letter set out in Article 28.

26.3 Effects

If the Commission rejects costs **at the payment of the balance**, it will deduct them from the total eligible costs declared, for the action, in the final summary financial statement (see Article 15.3 and 15.4). It will then calculate payment of the balance as set out in Article 16.3 or 16.4.

If the Commission rejects costs **after the payment of the balance**, it will deduct the amount rejected from the total eligible costs declared, by the beneficiary, in the final summary financial statement. It will then calculate the revised final grant amount as set out in Article 5.4. If the revised final grant amount is lower than the final grant amount, the Commission will recover the difference (see Article 28).

ARTICLE 27 — REDUCTION OF THE GRANT

27.1 Conditions

The Commission may — **at the payment of the balance** or **afterwards** — reduce the grant, if:

- (a) a beneficiary (or a natural person who has the power to represent or take decisions on its behalf) has committed:
 - (i) substantial errors, irregularities or fraud or
 - (ii) serious breach of obligations under the Agreement or during the award procedure (including improper implementation of the action, submission of false information, failure to provide required information, breach of ethical principles) or
- (b) a beneficiary (or a natural person who has the power to represent or take decisions on its behalf) has committed — in other EU or Euratom grants awarded to it under similar conditions — systemic or recurrent errors, irregularities, fraud or serious breach of obligations that have a material impact on this grant (**extension of findings from other grants to this grant**; see Article 17.5.2).

27.2 Amount to be reduced — Calculation — Procedure

The amount of the reduction will be proportionate to the seriousness of the errors, irregularities or fraud or breach of obligations.

Before reduction of the grant, the Commission will formally notify a '**pre-information letter**' to the coordinator or beneficiary concerned:

- informing it of its intention to reduce the grant, the amount it intends to reduce and the reasons why and
- inviting it to submit observations within 30 days of receiving notification

If the Commission does not receive any observations or decides to pursue reduction despite the observations it has received, it will formally notify **confirmation** of the reduction (if applicable, together with the notification of amounts due; see Article 16).

27.3 Effects

If the Commission reduces the grant at the time of **the payment of the balance**, it will calculate the reduced grant amount for the action and then determine the amount due as payment of the balance (see Articles 5.3.4 and 16.4).

If the Commission reduces the grant **after the payment of the balance**, it will calculate the revised final grant amount for the action or for the beneficiary concerned (see Article 5.4). If the revised final grant amount is lower than the final grant amount, the Commission will recover the difference (see Article 28).

ARTICLE 28 — RECOVERY OF UNDUE AMOUNTS

28.1 Amount to be recovered — Calculation — Procedure

The Commission will — **at the payment of the balance** or **afterwards** — claim back amount that was paid but is not due under the Agreement.

The coordinator is fully liable for repaying debts of the consortium (under the Agreement), even if it has not been the final recipient of those amounts.

In addition, the beneficiaries (including the coordinator) are jointly and severally liable for repaying any debts under the Agreement (including late-payment interest) — up to the maximum EU contribution indicated, for each beneficiary, in the estimated budget (as last amended; see Annex 2).

28.1.1 Recovery at payment of the balance

If the payment of the balance takes the form of a recovery (see Article 16.4), the Commission will formally notify a ‘**pre-information letter**’ to the coordinator:

- informing it of its intention to recover, the amount due as the balance and the reasons why and
- inviting the coordinator to submit observations within 30 days of receiving notification.

If no observations are submitted or the Commission decides to pursue recovery despite the observations it has received, it will **confirm** the amount to be recovered and formally notify to the coordinator a **debit note** with the terms and the date for payment (together with the notification of amounts due; see Article 16.5).

If payment is not made by the date specified in the debit note, the Commission will **recover** the amount:

- (a) by ‘**offsetting**’ it — without the coordinator’s consent — against any amounts owed to the coordinator by the Commission or an executive agency (from the EU or Euratom budget).

In exceptional circumstances, to safeguard the EU’s financial interests, the Commission may offset before the payment date specified in the debit note;

- (b) not applicable;

- (c) by **holding** the other beneficiaries jointly and severally **liable** — up to the maximum EU contribution indicated, for each beneficiary, in the estimated budget (as last amended; see Annex 2)

- (d) by **taking legal action** (see Article 41) or by **adopting an enforceable decision** under Article 299 of the Treaty on the Functioning of the EU (TFEU) and Article 79(2) of the Financial Regulation No 966/2012.

If payment is not made by the date in the debit note, the amount to be recovered (see above) will be increased by **late-payment interest** at the rate set out in Article 16.11, from the day following the payment date in the debit note, up to and including the date the Commission receives full payment of the amount.

Partial payments will be first credited against expenses, charges and late-payment interest and then against the principal.

Bank charges incurred in the recovery process will be borne by the beneficiary, unless Directive 2007/64/EC applies.

28.1.2 Recovery of amounts after payment of the balance

If — after the payment of the balance — the Commission revised the final grant amount for the action or for the beneficiary concerned (see Article 5.4), due to a rejection of costs or reduction of the grant, and the revised final grant amount is lower than the final grant amount (see Article 5.3), the Commission will:

- if the rejection or reduction does *not* concern a specific beneficiary: claim back the difference from the coordinator (even if it has not been the final recipient of the amount in question)

or

- otherwise: claim back the difference from the beneficiary concerned.

The Commission will formally notify a **pre-information letter** to the coordinator or beneficiary concerned:

- informing it of its intention to recover, the amount to be repaid and the reasons why and
- inviting it to submit observations within 30 days of receiving notification.

If no observations are submitted or the Commission decides to pursue recovery despite the observations it has received, it will **confirm** the amount to be recovered and formally notify to the coordinator or beneficiary concerned a **debit note**. This note will also specify the terms and the date for payment.

If payment is not made by the date specified in the debit note, the Commission will **recover** the amount:

- (a) by '**offsetting**' it — without the coordinator's or beneficiary's consent — against any amounts owed to the coordinator or beneficiary concerned by the Commission or an executive agency (from the EU or Euratom budget).

In exceptional circumstances, to safeguard the EU's financial interests, the Commission may offset before the payment date specified in the debit note;

- (b) by **holding** the other beneficiaries jointly and severally **liable**, up to the maximum EU contribution indicated, for each beneficiary, in the estimated budget (as last amended; see Annex 2);

- (c) by **taking legal action** (see Article 41) or by **adopting an enforceable decision** under Article 299 of the Treaty on the Functioning of the EU (TFEU) and Article 79(2) of the Financial Regulation No 966/2012.

If payment is not made by the date in the debit note, the amount to be recovered (see above) will be increased by **late-payment interest** at the rate set out in Article 16.11, from the day following the date for payment in the debit note, up to and including the date the Commission receives full payment of the amount.

Partial payments will be first credited against expenses, charges and late-payment interest and then against the principal.

Bank charges incurred in the recovery process will be borne by the beneficiary, unless Directive 2007/64/EC applies.

ARTICLE 29 — ADMINISTRATIVE SANCTIONS

In addition to contractual measures, the Commission may also adopt administrative sanctions under Articles 106 and 131(4) of the Financial Regulation No 966/2012 (i.e. exclusion from future procurement contracts, grants and expert contracts and/or financial penalties).

SECTION 2 LIABILITY FOR DAMAGES

ARTICLE 30 — LIABILITY FOR DAMAGES

30.1 Liability of the Commission

The Commission cannot be held liable for any damage caused to the beneficiaries or to third parties as a consequence of implementing the Agreement, including for gross negligence.

The Commission cannot be held liable for any damage caused by any of the beneficiaries or third parties involved in the action, as a consequence on implementing the Agreement.

30.2 Liability of the beneficiaries

Except in case of force majeure (see Article 35), the beneficiaries must compensate the Commission for any damage it sustains as a result of the implementation of the action or because the action was not implemented in full compliance with the Agreement.

SECTION 3 SUSPENSION AND TERMINATION

ARTICLE 31 — SUSPENSION OF PAYMENT DEADLINE

31.1 Conditions

The Commission may — at any moment — suspend the payment deadline (see Article 16.2 to 16.4) if a request for payment (see Article 15) cannot be approved because:

- (a) it does not comply with the provisions of the Agreement (see Article 15);
- (b) the technical or financial report(s) have not been submitted or are not complete or additional information is needed, or
- (c) there is doubt about the eligibility of the costs declared in the financial statements and additional checks, reviews, audits or investigations are necessary.

31.2 Procedure

The Commission will formally notify the coordinator of the suspension and the reasons why.

The suspension will **take effect** the day notification is sent by the Commission (see Article 36).

If the conditions for suspending the payment deadline are no longer met, the suspension will be **lifted** — and the remaining period will resume.

If the suspension exceeds two months, the coordinator may request the Commission if the suspension will continue.

If the payment deadline has been suspended due to the non-compliance of the technical or financial report(s) (see Article 15) and the revised report or statement is not submitted or was submitted but is also rejected, the Commission may also terminate the Agreement or the participation of the beneficiary (see Article 34.3.1(i)).

ARTICLE 32 — SUSPENSION OF PAYMENTS

32.1 Conditions

The Commission may — at any moment — suspend payments, in whole or in part for one or more beneficiaries, if:

- (a) a beneficiary (or a natural person who has the power to represent or take decision on its behalf) has committed or is suspected of having committed:
 - (i) substantial errors, irregularities or fraud or
 - (ii) serious breach of obligations under this Agreement or during the award procedure (including improper implementation of the action, submission of false information, failure to provide required information, breach of ethical principles), or
- (b) a beneficiary (or a natural person who has the power to represent or take decision on its behalf) has committed — in other EU or Euratom grants awarded to it under similar conditions — systemic or recurrent errors, irregularities, fraud or serious breach of obligations that have a material impact on this grant (**extension of findings from other grants to this grant**; see Article 17.5.2).

If payments are suspended for one or more beneficiaries, the Commission will make partial payment(s) for the part(s) not suspended. If suspension concerns the payment of the balance, the payment (or recovery) of the amount(s) concerned after suspension is lifted will be considered to be the payment that closes the action.

32.2 Procedure

Before suspending payments, the Commission will formally notify the coordinator or beneficiary concerned:

- informing it of its intention to suspend payments and the reasons why and
- inviting it to submit observations within 30 days of receiving notification.

If the Commission does not receive observations or decides to pursue the procedure despite the observations it has received, it will formally notify **confirmation** of the suspension. Otherwise, it will formally notify that the suspension procedure is not continued.

The suspension will **take effect** the day the confirmation notification is sent by the Commission.

If the conditions for resuming payments are met, the suspension will be **lifted**. The Commission will formally notify the coordinator or beneficiary concerned.

The beneficiaries may suspend implementation of the action (see Article 33.1) or terminate the Agreement or the participation of the beneficiary concerned (see Article 34.1 and 34.2).

ARTICLE 33 — SUSPENSION OF THE ACTION IMPLEMENTATION

33.1 Suspension of the action implementation, by the beneficiaries

33.1.1 Conditions

The beneficiaries may suspend implementation of the action or any part of it, if exceptional circumstances — in particular *force majeure* (see Article 35) — make implementation impossible or excessively difficult.

33.1.2 Procedure

The coordinator must immediately formally notify to the Commission the suspension (see Article 36), stating:

- the reasons why and
- the expected date of resumption.

The suspension will **take effect** the day this notification is received by the Commission.

Once circumstances allow for implementation to resume, the coordinator must immediately formally notify the Commission and request an **amendment** of the Agreement to set the date on which the action will be resumed, extend the duration of the action and make other changes necessary to adapt the action to the new situation (see Article 39) — unless the Agreement or the participation of a beneficiary has been terminated (see Article 34).

The suspension will be **lifted** with effect from the resumption date set out in the amendment. This date may be before the date on which the amendment enters into force.

Costs incurred during suspension of the action implementation are not eligible (see Article 6).

33.2 Suspension of the action implementation, by the Commission

33.2.1 Conditions

The Commission may suspend implementation of the action or any part of it, if:

- (a) a beneficiary (or a natural person who has the power to represent or take decisions on its behalf) has committed or is suspected of having committed:
- (i) substantial errors, irregularities or fraud or
 - (ii) serious breach of obligations under this Agreement or during the award procedure (including improper implementation of the action, submission of false declaration, failure to provide required information, breach of ethical principles) or
- (b) a beneficiary (or a natural person who has the power to represent or take decisions on its behalf) has committed — in other EU or Euratom grants awarded to it under similar conditions — systemic or recurrent errors, irregularities, fraud or serious breach of obligations that have a material impact on this grant (**extension of findings from other grants to this grant**; see Article 17.5.2).

33.2.2 Procedure

Before suspending implementation of the action, the Commission will formally notify the coordinator or beneficiary concerned:

- informing it of its intention to suspend the implementation and the reasons why and
- inviting it to submit observations within 30 days of receiving notification.

If the Commission does not receive observations or decides to pursue the procedure despite the observations it has received, it will formally notify **confirmation** of the suspension. Otherwise, it will formally notify that the procedure is not continued.

The suspension will **take effect** five days after confirmation notification is received (or on a later date specified in the notification).

It will be **lifted** if the conditions for resuming implementation of the action are met.

The coordinator or beneficiary concerned will be formally notified of the lifting and the Agreement will be **amended** to set the date on which the action will be resumed, extend the duration of the action and make other changes necessary to adapt the action to the new situation (see Article 39) — unless the Agreement has already been terminated (see Article 34).

The suspension will be lifted with effect from the resumption date set out in the amendment. This date may be before the date on which the amendment enters into force.

Costs incurred during suspension are not eligible (see Article 6).

The beneficiaries may not claim damages due to suspension by the Commission (see Article 30).

Suspension of the action implementation does not affect the Commission's right to terminate the Agreement or participation of a beneficiary (see Article 34), reduce the grant or recover amounts unduly paid (see Articles 27 and 28).

ARTICLE 34 — TERMINATION OF THE AGREEMENT OR OF THE PARTICIPATION OF ONE OR MORE BENEFICIARIES

34.1 Termination of the Agreement by the beneficiaries

34.1.1 Conditions and procedure

The beneficiaries may terminate the Agreement.

The coordinator must formally notify termination to the Commission (see Article 36), stating:

- the reasons why and
- the date the termination will take effect. This date must be after the notification.

If no reasons are given or if the Commission considers the reasons do not justify termination, the Agreement will be considered to have been '**terminated improperly**'.

The termination will **take effect** on the day specified in the notification.

34.1.2 Effects

The coordinator must — within 60 days from when termination takes effect — submit the final report (see Article 15.4).

If the Commission does not receive the report(s) within the deadline (see above), no costs will be taken into account.

The Commission will **calculate** the final grant amount (see Article 5.3) and the balance (see Article 16.4) on the basis of the report(s) submitted. Only costs incurred until termination are eligible (see Article 6). Costs relating to contracts due for execution only after termination are not eligible.

Improper termination may lead to a reduction of the grant (see Article 27).

After termination, the beneficiaries' obligations (in particular, Articles 15, 17, 18, 19, 21, 22, 24, 26, 27 and 28) continue to apply.

34.2 Termination of the participation of one or more beneficiaries, by the beneficiaries

34.2.1 Conditions and procedure

The participation of one or more beneficiaries may be terminated by the coordinator, on request of the beneficiary concerned or on behalf of the other beneficiaries.

The coordinator must formally notify termination to the Commission (see Article 36) and inform the beneficiary concerned.

If the coordinator's participation is terminated without its agreement, the formal notification must be done by another beneficiary (acting on behalf of the other beneficiaries).

The notification must include:

- the reasons why;

- the opinion of the beneficiary concerned (or proof that this opinion has been requested in writing);
- the date the termination takes effect. This date must be after the notification, and
- a request for amendment (see Article 39), with a proposal for reallocation of the tasks and the estimated budget of the beneficiary concerned (see Annexes 1 and 2) and, if necessary, the addition of one or more new beneficiaries (see Article 40). If termination takes effect after the period set out in Article 3, no request for amendment must be included, unless the beneficiary concerned is the coordinator. In this case, the request for amendment must propose a new coordinator.

If this information is not given or if the Commission considers that the reasons do not justify termination, the participation will be considered to have been **terminated improperly**.

The termination will **take effect** on the day specified in the notification.

34.2.2 Effects

The beneficiary concerned must submit to the coordinator:

- (i) a technical report and
- (ii) a financial statement covering the period to the date when termination takes effect.

This information must be included by the coordinator in the final report (see Article 15.4).

If the request for amendment is rejected by the Commission (because it calls into question the decision awarding the grant or breaches the principle of equal treatment of applicants), the Agreement may be terminated according to Article 34.3.1(c).

If the request for amendment is accepted by the Commission, the Agreement is **amended** to introduce the necessary changes (see Article 39).

Improper termination may lead to a reduction of the grant (see Article 27) or termination of the Agreement (see Article 34).

After termination, the concerned beneficiary's obligations (in particular Articles 15, 17, 18, 19, 21, 22, 24, 26, 27 and 28) continue to apply.

34.3 Termination of the Agreement or of the participation of one or more beneficiaries, by the Commission

34.3.1 Conditions

The Commission may terminate the Agreement or the participation of one or more beneficiaries, if:

- (a) one or more beneficiaries do not accede to the Agreement (see Article 40);
- (b) a change to their legal, financial, technical, organisational or ownership situation is likely to

substantially affect or delay the implementation of the action or calls into question the decision to award the grant;

- (c) following termination of participation for one or more beneficiaries (see above), the necessary changes to the Agreement would call into question the decision awarding the grant or breach the principle of equal treatment of applicants (see Article 39);
- (d) implementation of the action is prevented by force majeure (see Article 35) or suspended by the coordinator (see Article 33.1) and either:
 - (i) resumption is impossible, or
 - (ii) the necessary changes to the Agreement would call into question the decision awarding the grant or breach the principle of equal treatment of applicants;
- (e) a beneficiary is declared bankrupt, being wound up, having its affairs administered by the courts, has entered into an arrangement with creditors, has suspended business activities, or is subject to any other similar proceedings or procedures under national law;
- (f) a beneficiary (or a natural person who has the power to represent or take decisions on its behalf) has been found guilty of professional misconduct, proven by any means;
- (g) a beneficiary does not comply with the applicable national law on taxes and social security;
- (h) a beneficiary (or a natural person who has the power to represent or take decisions on its behalf) has committed fraud, corruption, or is involved in a criminal organisation, money laundering or any other illegal activity;
- (i) a beneficiary (or a natural person who has the power to represent or take decisions on its behalf) has committed:
 - (i) substantial errors, irregularities or fraud or
 - (ii) serious breach of obligations under the Agreement or during the award procedure (including improper implementation of the action, submission of false information, failure to provide required information, breach of ethical principles);
- (j) a beneficiary (or a natural person who has the power to represent or take decisions on its behalf) has committed — in other EU or Euratom grants awarded to it under similar conditions — systemic or recurrent errors, irregularities, fraud or serious breach of obligations that have a material impact on this grant (**extension of findings from other grants to this grant**; see Article 17.5.2);
- (k) not applicable.

34.3.2 Procedure

Before terminating the Agreement or participation of one or more beneficiaries, the Commission will formally notify the coordinator or beneficiary concerned:

- informing it of its intention to terminate and the reasons why and

- inviting it, within 30 days of receiving notification, to submit observations and — in case of Point (i.ii) above — to inform the Commission of the measures to ensure compliance with the obligations under the Agreement.

If the Commission does not receive observations or decides to pursue the procedure despite the observations it has received, it will formally notify to the coordinator or beneficiary concerned **confirmation** of the termination and the date it will take effect. Otherwise, it will formally notify that the procedure is not continued.

The termination will **take effect**:

- for terminations under Points (b), (c), (e), (g), (i.ii) and (k) above: on the day specified in the notification of confirmation (see above);
- for terminations under Points (a), (d), (f), (h), (i.i) and (j) above: on the day after the notification of the confirmation is received.

34.3.3 Effects

(a) for **termination of the Agreement**:

The coordinator must — within 60 days from when termination takes effect — submit a final report (see Article 15.4).

If the Agreement is terminated for breach of the obligation to submit report(s) (see Articles 15.8 and 34.3.1(i)), the coordinator may not submit any report(s) after termination.

If the Commission does not receive the report(s) within the deadline (see above), no costs will be taken into account.

The Commission will **calculate** the final grant amount (see Article 5.3) and the balance (see Article 16.4) on the basis of the report(s) submitted. Only costs incurred until termination takes effect are eligible (see Article 6). Costs relating to contracts due for execution only after termination are not eligible.

This does not affect the Commission's right to reduce the grant (see Article 27) or to impose administrative sanctions (Article 29).

The beneficiaries may not claim damages due to termination by the Commission (see Article 30).

After termination, the beneficiaries' obligations (in particular Articles 15, 17, 18, 19, 21, 22, 24, 26, 27 and 28) continue to apply.

(b) for **termination of the participation of one or more beneficiaries**:

The coordinator must — within 60 days from when termination takes effect — submit a request for amendment (see Article 39), with a proposal for reallocation of the tasks and estimated budget of the beneficiary concerned (see Annexes 1 and 2) and, if necessary, the addition of one or more new beneficiaries (see Article 40). If termination is notified after the period set out

in Article 3, no request for amendment must be submitted unless the beneficiary concerned is the coordinator. In this case the request for amendment must propose a new coordinator.

The beneficiary concerned must submit to the coordinator:

- (i) a technical report and
- (ii) a financial statement covering the period to the date when termination takes effect.

This information must be included by the coordinator in the final report (see Article 15.4).

If the request for amendment is rejected by the Commission (because it calls into question the decision awarding the grant or breaches the principle of equal treatment of applicants), the Agreement may be terminated according to Article 34.3.1(c).

If the request for amendment is accepted by the Commission, the Agreement is **amended** to introduce the necessary changes (see Article 39).

After termination, the concerned beneficiary's obligations (in particular Articles 15, 17, 18, 19, 21, 22, 24, 26, 27 and 28) continue to apply.

SECTION 4 FORCE MAJEURE

ARTICLE 35 — FORCE MAJEURE

'Force majeure' means any situation or event that:

- prevents either party from fulfilling their obligations under the Agreement,
- was unforeseeable, exceptional situation and beyond the parties' control,
- was not due to error or negligence on their part (or on the part of third parties involved in the action), and
- proves to be inevitable in spite of exercising all due diligence.

The following cannot be invoked as force majeure:

- any default of a service, defect in equipment or material or delays in making them available, unless they stem directly from a relevant case of force majeure,
- labour disputes or strikes, or
- financial difficulties.

Any situation constituting force majeure must be formally notified to the other party without delay, stating the nature, likely duration and foreseeable effects.

The parties must immediately take all the necessary steps to limit any damage due to force majeure and do their best to resume implementation of the action as soon as possible.

The party prevented by force majeure from fulfilling its obligations under the Agreement cannot be considered in breach of them.

CHAPTER 7 FINAL PROVISIONS

ARTICLE 36 — COMMUNICATION BETWEEN THE PARTIES

36.1 Form and means of communication

Communication under the Agreement (information, requests, submissions, ‘formal notifications’, etc.) must:

- be made in writing and
- bear the number of the Agreement.

Until the payment of the balance: all communication must be made through the electronic exchange system and using the forms and templates provided there.

After the payment of the balance: formal notifications must be made by registered post with proof of delivery (‘formal notification on paper’).

Communications in the electronic exchange system must be made by persons authorised according to the Participant Portal terms & conditions. For naming the authorised persons, each beneficiary must have designated — before the signature of this Agreement — a ‘legal entity appointed representative (LEAR)’. The role and tasks of the LEAR are stipulated in his/her appointment letter (see Participant Portal terms & conditions).

If the electronic exchange system is temporarily unavailable, instructions will be given on the Commission websites.

36.2 Date of communication

Communications are considered to have been made when they are sent by the sending party (i.e. on the date and time they are sent through the electronic exchange system).

Formal notifications through the **electronic** exchange system are considered to have been made when they are received by the receiving party (i.e. on the date and time of acceptance by the receiving party, as indicated by the time stamp). A formal notification that has not been accepted within 10 days after sending is considered to have been accepted.

Formal notifications **on paper** sent by **registered post** with proof of delivery (only after the payment of the balance) are considered to have been made on either:

- the delivery date registered by the postal service or
- the deadline for collection at the post office.

If the electronic exchange system is temporarily unavailable, the sending party cannot be considered in breach of its obligation to send a communication within a specified deadline.

36.3 Addresses for communication

The **electronic** exchange system must be accessed via the following URL:

<https://ec.europa.eu/research/participants/portal/desktop/en/projects/>

The Commission will formally notify the coordinator and beneficiaries in advance any changes to this URL.

Formal notifications on paper (only after the payment of the balance) addressed **to the Commission** must be sent to the following address:

European Commission
Directorate General Justice and Consumers
Programme and Financial management (MO59 4/021)
B-1049 Brussels
BELGIUM

Formal notifications on paper (only after the payment of the balance) addressed **to the beneficiaries** must be sent to their legal address as specified in the Participant Portal Beneficiary Register.

ARTICLE 37 — INTERPRETATION OF THE AGREEMENT

37.1 Precedence of the Terms and Conditions over the Annexes

The provisions in the Terms and Conditions of the Agreement take precedence over its Annexes.

Annex 2 takes precedence over Annex 1.

37.2 Privileges and immunities

Not applicable

ARTICLE 38 — CALCULATION OF PERIODS, DATES AND DEADLINES

In accordance with Regulation No 1182/71¹², periods expressed in days, months or years are calculated from the moment the triggering event occurs.

The day during which that event occurs is not considered as falling within the period.

ARTICLE 39 — AMENDMENTS TO THE AGREEMENT

39.1 Conditions

¹² Regulation (EEC, Euratom) No 1182/71 of the Council of 3 June 1971 determining the rules applicable to periods, dates and time-limits (OJ L 124, 8/6/1971, p. 1).

The Agreement may be amended, unless the amendment entails changes to the Agreement which would call into question the decision awarding the grant or breach the principle of equal treatment of applicants.

Amendments may be requested by any of the parties.

39.2 Procedure

The party requesting an amendment must submit a request for amendment signed in the electronic exchange system (see Article 36).

The coordinator submits and receives requests for amendment on behalf of the beneficiaries (see Annex 3).

If a change of coordinator is requested without its agreement, the submission must be done by another beneficiary (acting on behalf of the other beneficiaries).

The request for amendment must include:

- the reasons why;
- the appropriate supporting documents, and
- for a change of coordinator without its agreement: the opinion of the coordinator (or proof that this opinion has been requested in writing).

The Commission may request additional information.

If the party receiving the request agrees, it must sign the amendment in the electronic exchange system within 45 days of receiving notification (or any additional information the Commission has requested). If it does not agree, it must formally notify its disagreement within the same deadline. The deadline may be extended, if necessary for the assessment of the request. If no notification is received within the deadline, the request is considered to have been rejected.

An amendment **enters into force** on the day of the signature of the receiving party.

An amendment **takes effect** on the date agreed by the parties or, in the absence of such an agreement, on the date on which the amendment enters into force.

ARTICLE 40 — ACCESSION TO THE AGREEMENT

40.1 Accession of the beneficiaries mentioned in the Preamble

The other beneficiaries must accede to the Agreement by signing the Accession Form (see Annex 3) in the electronic exchange system (see Article 36) within 30 days after its entry into force (see Article 42).

They will assume the rights and obligations under the Agreement with effect from the date of its entry into force (see Article 42).

If a beneficiary does not accede to the Agreement within the above deadline, the coordinator must — within 30 days — request an amendment to make any changes necessary to ensure proper

implementation of the action. This does not affect the Commission's right to terminate the Agreement (see Article 34).

40.2 Addition of new beneficiaries

In justified cases, the beneficiaries may request the addition of a new beneficiary.

For this purpose, the coordinator must submit a request for amendment in accordance with Article 39. It must include an Accession Form (see Annex 3) signed by the new beneficiary in the electronic exchange system (see Article 36).

New beneficiaries must assume the rights and obligations under the Agreement with effect from the date of their accession specified in the Accession Form (see Annex 3).

ARTICLE 41 — APPLICABLE LAW AND SETTLEMENT OF DISPUTES

41.1 Applicable law

The Agreement is governed by the applicable EU law, supplemented if necessary by the law of Belgium.

41.2 Dispute settlement

If a dispute concerning the interpretation, application or validity of the Agreement cannot be settled amicably, the General Court — or, on appeal, the Court of Justice of the European Union — has sole jurisdiction. Such actions must be brought under Article 272 of the Treaty on the Functioning of the EU (TFEU).

If a dispute concerns administrative sanctions, offsetting or an enforceable decision under Article 299 TFEU (see Articles 28, 29 and 30), the beneficiaries must bring action before the General Court — or, on appeal, the Court of Justice of the European Union — under Article 263 TFEU.

ARTICLE 42 — ENTRY INTO FORCE OF THE AGREEMENT

The Agreement will enter into force on the day of signature by the Commission or the coordinator, depending on which is later.

SIGNATURES

For the coordinator

For the Commission



EUROPEAN COMMISSION
Directorate-General for Justice and Consumers
Programme and Financial management

ANNEX 1 (part A)

REC Action Grant

NUMBER — 847643 — HC

Table of Contents

1.1. The project summary.....	3
1.2. The list of beneficiaries.....	4
1.3. Workplan Tables - Detailed implementation.....	5
1.3.1. WT1 List of work packages.....	5
1.3.2. WT2 List of deliverables.....	6
1.3.3. WT3 Work package descriptions.....	10
Work package 1.....	10
Work package 2.....	15
Work package 3.....	18
Work package 4.....	22
Work package 5.....	34
1.3.4. WT4 List of milestones.....	38
1.3.5. WT5 Critical Implementation risks and mitigation actions.....	47
1.3.6 WT6 Summary of project effort in person-months.....	50
1.3.7. WT7 Tentative schedule of project reviews.....	51

1.1. The project summary

Project Number ¹	847643	Project Acronym ²	HC
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One form per project

General information

Project title ³	Developing a comprehensive strategy against racism, intolerance and hate crime
Starting date ⁴	01/10/2019
Duration in months ⁵	24
Call (part) identifier ⁶	REC-RRAC-HATE-AG-2018
Topic	REC-RRAC-HATE-AG-2018 Restricted call for proposals for public authorities on preventing and combating racism, xenophobia and other forms of intolerance, and in particular hate crime and hate speech
Fixed EC Keywords	
Free keywords	hate crime, capacity and trust building, awareness campaign, hate speech, human rights, National Action Plan against racism and intolerance, public prosecutors trainings, evaluation report

Abstract ⁷

Objectives

- To form a comprehensive strategy against racism, intolerance and hate speech
- To improve reporting of hate crimes by disseminating hate crime victims' rights
- To raise public awareness
- To promote capacity building for prosecutors, public officers and MPs, as well as targeted communities
- To induce trust building of targeted communities towards the judiciary and law-enforcement authorities
- To effectively prosecute hate crimes

Activities

- Elaboration of a National Action Plan against Racism and Intolerance
- Publicity actions through a media plan, an awareness campaign against racism and intolerance and creation of a Web page for the National Council against Racism and Xenophobia
- Activities of capacity and trust building
- Edition of an Evaluation Report and a Report for the European added value of the project by the Centre for Political Research of Panteion University

Type and number of persons benefiting from the project

- 40 public prosecutors
- 180 members of all targeted communities and potential victims of hate crimes
- members of the Hellenic Parliament
- 30 public officers involved in combatting racism, intolerance and hate crimes
- the entire population

Expected results

- To develop a comprehensive strategy against racism, intolerance and hate crimes
- To foster awareness raising
- To promote human rights perspective and equal citizenship for all humans,
- To increase capacity of all stakeholders (targeted communities, public authorities, the judiciary and members of the parliament),
- To reinforce access to justice for victims of hate crimes
- To increase hate crime reporting
- To produce transferable best practices and results at European level

Type and number of deliverables to be produced

- 11 capacity and trust building outputs
- 2 national training outputs
- 1 national policy deliverable (Action Plan)
- 3 public awareness deliverables
- 2 reports

1.2. List of Beneficiaries

Project Number ¹	847643	Project Acronym ²	HC
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List of Beneficiaries

No	Name	Short name	Country	Project entry month ⁸	Project exit month
1	MINISTRY OF JUSTICE, TRANSPARENCY AND HUMAN RIGHTS	GMJ	Greece	1	24
2	HELLENIC PARLIAMENT	EPIS	Greece	1	24
3	PANTEIO PANEPISTIMIO KOINONIKON KAIPOLITIKON EPISTIMON	UPSPS	Greece	1	24

1.3. Workplan Tables - Detailed implementation Associated with document Ref. Ares(2019)3853615 - 17/06/2019

1.3.1. WT1 List of work packages

WP Number ⁹	WP Title	Lead beneficiary ¹⁰	Person-months ¹¹	Start month ¹²	End month ¹³
WP1	Management and Coordination of the Project	1 - GMJ	24.10	1	24
WP2	National Action Plan against Racism and Intolerance	1 - GMJ	6.00	1	6
WP3	Awareness raising - Publicity	1 - GMJ	22.00	1	24
WP4	Capacity and Trust Building	1 - GMJ	9.30	1	18
WP5	Program evaluation	3 - UPSPS	18.00	1	24
Total			79.40		

1.3.2. WT2 list of deliverables

Deliverable Number ¹⁴	Deliverable Title	WP number ⁹	Lead beneficiary	Type ¹⁵	Dissemination level ¹⁶	Due Date (in months) ¹⁷
D1.1	Project review meeting 1	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	2
D1.2	Project review meeting 2	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	4
D1.3	Project Review Meeting 3	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	6
D1.4	Project review meeting 4	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	8
D1.5	Project review meeting 5	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	10
D1.6	Project review meeting 6	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	12
D1.7	Project review meeting 7	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	14
D1.8	Project review meeting 8	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	16

Deliverable Number¹⁴	Deliverable Title	WP number⁹	Lead beneficiary	Type¹⁵	Dissemination level¹⁶	Due Date (in months)¹⁷
D1.9	Project review meeting 9	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D1.10	Project review meeting 10	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	20
D1.11	Project review meeting 11	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	22
D1.12	Project review meeting 12	WP1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	24
D1.13	Progress report	WP1	1 - GMJ	Report	Confidential, only for members of the consortium (including the Commission Services)	13
D2.1	National Action Plan against Racism and Intolerance	WP2	1 - GMJ	Report	Public	6
D3.1	Media Plan	WP3	1 - GMJ	Report	Public	3
D3.2	Awareness raising campaign against racism and intolerance/ Material to be used	WP3	1 - GMJ	Other	Public	18
D3.3	Website for the National Council against Racism and Intolerance	WP3	1 - GMJ	Websites, patents filling, etc.	Public	24
D4.1	Guide for the Rights of Hate Crime Victims	WP4	1 - GMJ	Report	Public	6
D4.2	Workshop 1	WP4	3 - UPSPS	Other	Confidential, only for members of the consortium (including the	18

Deliverable Number¹⁴	Deliverable Title	WP number⁹	Lead beneficiary	Type¹⁵	Dissemination level¹⁶	Due Date (in months)¹⁷
					Commission Services)	
D4.3	Workshop 2	WP4	2 - EPIS	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.4	Workshop 3	WP4	3 - UPSPS	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.5	Training course 1	WP4	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.6	Training course 2	WP4	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.7	Educational meeting 1	WP4	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.8	Educational meeting 2	WP4	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.9	Educational meeting 3	WP4	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.10	Educational meeting 4	WP4	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18

Deliverable Number¹⁴	Deliverable Title	WP number⁹	Lead beneficiary	Type¹⁵	Dissemination level¹⁶	Due Date (in months)¹⁷
D4.11	Educational meeting 5	WP4	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.12	Educational meeting 6	WP4	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.13	One-day-conference	WP4	2 - EPIS	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D5.1	Evaluation report	WP5	3 - UPSPS	Report	Public	24
D5.2	Report for the European Added Value	WP5	3 - UPSPS	Report	Public	24

1.3.3. WT3 Work package descriptions

Work package number ⁹	WP1	Lead beneficiary ¹⁰	1 - GMJ
Work package title	Management and Coordination of the Project		
Start month	1	End month	24

Objectives

To attain effectively the pre - determined goals of the project by efficiently using existing resources. To plan, organize, actuate, control, and accomplish the project's objectives. To coordinate all activities related to the project in order to accomplish them in estimated time in the best possible way.

Description of work and role of partners

WP1 - Management and Coordination of the Project [Months: 1-24]

GMJ

It includes:

1. Co-ordination. The Core Project Team will co-ordinate the management of the project. All activity planning will roll out jointly with the Partners, followed the division of tasks already agreed in this document. All partners will use existing communication and consultation structures, so that project decisions are taken in a timely manner, and with the appropriate involvement of partners.
2. Management. The Project manager will lead the overall programme of activities. The Core Project Team will ensure the supervision and support of all project staff, advice on policy matters and make use for opportunities for synergy.
3. Quality control. The Core Project Team will uphold the quality of project components, ensuring that products and documents are responsive to national, local or community needs.
4. Logistical planning, implementation and support. The project foresees implementation reports, the collection, registration, certification of physical cost implementation, monthly meetings with the partners.
5. Financial management. A budget assistant will carry out regular budget planning, monitoring and revision, review expenditure and re-allocate funds as needed. He will collect financial documents and release payments.
6. Monitoring and evaluation. The project will maintain all project files, so as to be certain that outputs, outcomes and impact will be able to be processed and evaluated. Thus, future performance and results could improve establishing links between the past, present and future actions. All project's outcomes will be delivered to the Centre for Political Research of Panteion University which will undertake the composition of the European Added Value Report and the Evaluation Report.

Participation per Partner

Partner number and short name	WP1 effort
1 - GMJ	24.10
Total	24.10

List of deliverables

Deliverable Number ¹⁴	Deliverable Title	Lead beneficiary	Type ¹⁵	Dissemination level ¹⁶	Due Date (in months) ¹⁷
D1.1	Project review meeting 1	1 - GMJ	Other	Confidential, only for members of the consortium (including	2

List of deliverables

Deliverable Number ¹⁴	Deliverable Title	Lead beneficiary	Type ¹⁵	Dissemination level ¹⁶	Due Date (in months) ¹⁷
				the Commission Services)	
D1.2	Project review meeting 2	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	4
D1.3	Project Review Meeting 3	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	6
D1.4	Project review meeting 4	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	8
D1.5	Project review meeting 5	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	10
D1.6	Project review meeting 6	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	12
D1.7	Project review meeting 7	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	14
D1.8	Project review meeting 8	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	16
D1.9	Project review meeting 9	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D1.10	Project review meeting 10	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	20

List of deliverables

Deliverable Number ¹⁴	Deliverable Title	Lead beneficiary	Type ¹⁵	Dissemination level ¹⁶	Due Date (in months) ¹⁷
D1.11	Project review meeting 11	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	22
D1.12	Project review meeting 12	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	24
D1.13	Progress report	1 - GMJ	Report	Confidential, only for members of the consortium (including the Commission Services)	13

Description of deliverables

1. Bimonthly implementation, evaluation and performance reports. There will take place twelve (12) bimonthly meetings with the Partners. Their records will be kept in Management Team Headquarters. There will also be twelve (12) printed reports in Greek, which will present and monitor emerging issues, performed activities and budget overview. They will also record the progress of the project, evaluate the outcomes and describe the stakeholders engaging. The meetings' reports will be electronically available. 6 copies of them will be distributed after each meeting (2 for every partner).

2. Progress report in English for the first 12 months of project's implementation.

D1.1 : Project review meeting 1 [2]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the second month. The meeting's records will be kept in Management Team Headquarters. The output will be α printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.2 : Project review meeting 2 [4]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the fourth month. The meeting's records will be kept in Management Team Headquarters. The output will be α printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.3 : Project Review Meeting 3 [6]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the sixth month. The meeting's records will be kept in Management Team Headquarters. The output will be α printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.4 : Project review meeting 4 [8]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the eighth month. The meeting's records will be kept in Management Team Headquarters. The output will be α printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.5 : Project review meeting 5 [10]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the tenth month. The meeting's records will be kept in Management Team Headquarters. The output will be a printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.6 : Project review meeting 6 [12]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the twelfth month. The meeting's records will be kept in Management Team Headquarters. The output will be a printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.7 : Project review meeting 7 [14]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the fourteenth month. The meeting's records will be kept in Management Team Headquarters. The output will be a printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.8 : Project review meeting 8 [16]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the sixteenth month. The meeting's records will be kept in Management Team Headquarters. The output will be a printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.9 : Project review meeting 9 [18]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the eighteenth month. The meeting's records will be kept in Management Team Headquarters. The output will be a printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.10 : Project review meeting 10 [20]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the twentieth month. The meeting's records will be kept in Management Team Headquarters. The output will be a printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.11 : Project review meeting 11 [22]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the twenty-second month. The meeting's records will be kept in Management Team Headquarters. The output will be a printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.12 : Project review meeting 12 [24]

Bimonthly meeting with the Partners examining the project's progress. The meeting will be held in Management Team Headquarters at the end of the twenty-fourth month. The meeting's records will be kept in Management Team Headquarters. The output will be a printed report in Greek which will secure careful monitoring and control processes so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through the report, thus achieving adequate monitoring.

D1.13 : Progress report [13]

Progress report to the EC, in English.

Schedule of relevant Milestones

Milestone number¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
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Work package number ⁹	WP2	Lead beneficiary ¹⁰	1 - GMJ
Work package title	National Action Plan against Racism and Intolerance		
Start month	1	End month	6

Objectives

To form a comprehensive national strategy against racism, intolerance and hate crime, to achieve better coordination of public authorities, to express a zero tolerance state policy towards racism, intolerance and hate crimes, and to effectively prevent and combat racism, intolerance and hate crimes.

Description of work and role of partners

WP2 - National Action Plan against Racism and Intolerance [Months: 1-6]

GMJ

The present Work Package concerns the Elaboration of a National Action Plan against Racism and Intolerance, which will present a comprehensive national strategy against racism, intolerance and hate crimes. The existing state of play will be described, including national legislation, policy and practice, based on reliable data. It will also highlight the problems that should be addressed and it will set the goals that need to be achieved, by identifying the priorities and by taking into account international standards and best practices. Based on the above, the Action Plan will present the necessary institutional interventions of all public authorities involved (not only of the Ministry of Justice), with specific targets and benchmarks. It should also be stressed that regarding the Action Plan there will be consultation with the National Council against Racism and Intolerance (NCRI), an inter-ministerial body assigned with the task of developing policies on preventing and combating racism and intolerance. This body is composed by representatives of the relevant Ministries and of civil society actors. The NCRI will also monitor the implementation of the Action Plan. This will ensure the sustainability and long-term results of the Activity.

Participation per Partner

Partner number and short name	WP2 effort
1 - GMJ	6.00
Total	6.00

List of deliverables

Deliverable Number ¹⁴	Deliverable Title	Lead beneficiary	Type ¹⁵	Dissemination level ¹⁶	Due Date (in months) ¹⁷
D2.1	National Action Plan against Racism and Intolerance	1 - GMJ	Report	Public	6

Description of deliverables

The National Action Plan against Racism and Intolerance will be printed in Greek in 500 copies to be disseminated. It will be also available in electronic format in Greek and in English. It will consist approximately of 100 pages. It addresses to general public and more specifically to all targeted communities. In order to elaborate the Action Plan, the appropriate methodology will be identified. The Action Plan will be drafted by an expert, who will also undertake its translation in English. Moreover, the Action Plan will be uploaded on the websites of the National Council against Racism and Intolerance and the Ministry of Justice to be publicly available.

The first step in order to draft the National Action Plan Against Racism and Intolerance is to consult with the National Council against Racism and Intolerance (NCRI) on the methodology of the Action Plan. NCRI, which has already

been established, is an inter-ministerial body assigned with the task of developing policies on preventing and combating racism and intolerance. It is composed by representatives of the Ministries involved, of the National Commission for Human Rights, of UNHCR, of RVRN (comprised of 46 NGOs) and other important stakeholders of the civil society. According to its mandate, one of its main tasks is the development of a comprehensive strategy against racism, intolerance and hate crimes. The NCRI has already discussed the matter and has concluded that the Action Plan will include actions planned by the Ministries and the NCRI itself. After the consultation phase, all actions planned by the various Ministries will be compiled. Then, the Plan will be drafted according to international standards. The draft Action Plan will be submitted to NCRI for comments and observations and it will be revised based on these comments.

D2.1 : National Action Plan against Racism and Intolerance [6]

The National Council against Racism and Intolerance (NCRI) will elaborate the National Action Plan against Racism and Intolerance which will include actions of the Ministries involved in NCRI and the NCRI itself. Non-state stakeholders will make suggestions to state authorities for actions. The Action Plan will be printed in Greek in 500 copies to be disseminated and translated in English. It will be uploaded on the websites of the National Council against Racism and Intolerance and the Ministry of Justice to be publicly available. It will present a comprehensive national strategy against racism, intolerance and hate crimes. The existing state of play will be described, including national legislation, policy and practice, based on reliable data. It will also highlight the problems that should be addressed and it will set the goals that need to be achieved, by identifying the priorities and by taking into account international standards and best practices. Based on the above, the Action Plan will present the necessary institutional interventions of all public authorities involved (not only of the Ministry of Justice), with specific targets and benchmarks. The Action Plan will also include a presentation of the actions adopted in the present project (trainings, trust building meetings, awareness raising campaign, NCRI's Webpage, Guide).

Schedule of relevant Milestones

Milestone number ¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
MS1	National Action Plan against Racism and Intolerance	1 - GMJ	1	The National Action Plan against Racism and Intolerance will contribute to the development of a comprehensive strategy against racism, intolerance and hate crime, by recording all respective institutional interventions based on reliable data and needs, while taking into consideration European best practices. The Action Plan will present a comprehensive national strategy against racism, intolerance and hate crimes, by presenting the necessary institutional interventions of all public authorities involved (not only of the Ministry of Justice), with specific targets and benchmarks. The Action Plan also constitutes not only a prerequisite for the Workshop that will take place in the Centre of Political Research of Panteion

Schedule of relevant Milestones

Milestone number ¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
				<p>University with the support of NCRI about its elaboration, aiming at identifying the methodology, the positive outcomes, the challenges and the lessons learned from drafting the Action Plan, but it is also a prerequisite for the Evaluation Report and the Report for the European Added Value as well. The first step in order to draft the National Action Plan Against Racism and Intolerance is to consult with the National Council against Racism and Intolerance (NCRI) on the methodology of the Action Plan. The NCRI has already discussed the matter and has concluded that the Action Plan will include actions planned by the Ministries and the NCRI itself. Then, the Plan will be drafted according to international standards. The draft Action Plan will be submitted to NCRI for comments and observations and it will be revised based on these comments.</p>

Work package number ⁹	WP3	Lead beneficiary ¹⁰	1 - GMJ
Work package title	Awareness raising - Publicity		
Start month	1	End month	24

Objectives

To raise awareness of the general population against racism, intolerance and hate crimes and to provide information, to complement the national strategy against racism and intolerance with actions targeting the general population, to express a zero tolerance state policy towards racism, intolerance and hate crimes, to effectively prevent and combat racism, intolerance and hate crimes.

Description of work and role of partners

WP3 - Awareness raising - Publicity [Months: 1-24]

GMJ

It includes the above actions:

1. Development of a media plan for an awareness-raising campaign against racism, intolerance and hate crime, 2. Launching an Awareness raising campaign against racism and intolerance, and 3. Creating of a website for the National Council Against Racism and Intolerance.

The media plan needs to take into account the specific purpose of the awareness raising campaign and other similar successful campaigns and needs to determine the best way to convey a message to the target audience and set out a systematic process that synchronizes all contributing elements in order to achieve the campaign's goal. As the need to increase awareness-raising within the Greek society has been identified, this will be achieved through an effective media campaign concerning these phenomena, which has never been conducted before. The target of the campaign is to raise awareness of the general population against racism, intolerance and hate crimes and to provide information. The campaign will be one of the elements complementing a comprehensive national strategy. Moreover, through the campaign, the state will express a zero tolerance policy against these phenomena. The Web page for the National Council against Racism and Intolerance will complement the latter activity. As NCRI is the most appropriate body to provide information on issues concerning racism, intolerance and hate crimes, policies, legislation and victim's rights, a webpage providing publicly available information on these issues is most useful. The Website will constantly provide updated data and information.

Participation per Partner

Partner number and short name	WP3 effort
1 - GMJ	22.00
Total	22.00

List of deliverables

Deliverable Number ¹⁴	Deliverable Title	Lead beneficiary	Type ¹⁵	Dissemination level ¹⁶	Due Date (in months) ¹⁷
D3.1	Media Plan	1 - GMJ	Report	Public	3
D3.2	Awareness raising campaign against racism and intolerance/Material to be used	1 - GMJ	Other	Public	18

List of deliverables

Deliverable Number ¹⁴	Deliverable Title	Lead beneficiary	Type ¹⁵	Dissemination level ¹⁶	Due Date (in months) ¹⁷
D3.3	Website for the National Council against Racism and Intolerance	1 - GMJ	Websites, patents filling, etc.	Public	24

Description of deliverables

1. Development of a media plan for an awareness-raising campaign against racism, intolerance and hate crime. Such a campaign should include the most appropriate publicity activities, taking into consideration the nature of the phenomenon that it seeks to combat. The media plan should take into account successful campaigns against racism, intolerance and hate crimes that have been conducted in other countries, not only by states, but also by international organizations or NGOs. The media plan will determine the best way to convey a message to the target audience and set out a systematic process that synchronizes all contributing elements in order to achieve the campaign's goal. The Media Plan will select the optimal media platforms for the Awareness Raising Campaign to use. It will determine the best combination of media to achieve the project objectives and determine the best way to convey a message to the target audiences. It will set out a systematic process that synchronizes all contributing elements in order to achieve the given goals. The Media Plan will be mentioned and evaluated in the Evaluation Report. It will also be electronically available.

2. Awareness raising campaign against racism and intolerance. The campaign will be conducted based on the aforementioned Media Plan. Having identified target groups and channels to use, the Campaign will develop and promote the selected messages in accordance with what is defined in the Media Plan. The Campaign is also monitored and evaluated by the Core Project Team and the Centre for Political Research of Panteion University. The Campaign addresses to the general population and potential hate crime victims. It is one of the elements complementing a comprehensive national strategy. The Campaign and its results will be treated in the Evaluation Report and the Report for European Added Value. The creation of a Media Plan followed by an awareness raising campaign will undoubtedly raise public awareness, leading to preventing and combating racism, intolerance and hate crimes and to reinforcing victims' access to justice.

3. Creation of a website for the National Council Against Racism and Intolerance providing updated data and information.

The National Council against Racism and Intolerance (NCRI), is an inter-ministerial body established in 2015 following the recommendation of the European Commission against Racism and Intolerance of the Council of Europe. NCRI is Greece's most important body on similar issues. It is tasked, among others, with the development of policies on preventing and combating racism and intolerance. It consists of representatives of the relevant Ministries and civil society actors. Therefore, NCRI is the most appropriate body to provide information on issues concerning racism, intolerance and hate crimes, policies, legislation and victim's rights. Moreover, it has already undertaken important actions that need to be disseminated. For this reason, a webpage providing publicly available information on these issues is of crucial importance. There will also be a direct link with the webpage of Ministry of Justice, Transparency and Human Rights. The Webpage will also be translated to English. It will have a visits counter.

D3.1 : Media Plan [3]

It is about the development of a media plan for an awareness-raising campaign against racism, intolerance and hate crime. Such a campaign should include the most appropriate publicity activities, taking into consideration the nature of the phenomenon that it seeks to combat. The media plan will take into account successful campaigns against racism, intolerance and hate crimes that have been conducted in other countries, not only by states, but also by international organizations or NGOs. The media plan will determine the best way to convey the message to the target audience and set out a systematic process that synchronizes all contributing elements in order to achieve the campaign's goal. The Media Plan will be available electronically.

D3.2 : Awareness raising campaign against racism and intolerance/Material to be used [18]

The Campaign will be in accordance with what is defined in the Media Plan. The target of the campaign is to raise awareness of the general population against racism, intolerance and hate crimes and to provide information. The campaign will be one of the elements complementing the comprehensive national strategy. Moreover, through the campaign, the state will express a zero tolerance policy against these phenomena. It is very important to notify at this

point that it is not possible to provide more information about the Campaign such as activities/outputs/materials to be produced, firstly because the Media Plan will define what kind of material will be used to convey the message of the campaign (for instance booklets/leaflets, film and videos, etc.), and secondly because the Campaign will be subcontracted, involving "a contract providing for experts to evaluate an action without specifying the documents they should read, the event they should attend, the person they should interview, etc" in the sense of Article 10 of the Grant Agreement. Outputs: - samples of all materials realized in the framework of the campaign.

D3.3 : Website for the National Council against Racism and Intolerance [24]

The National Council against Racism and Intolerance (NCRI) is an inter-ministerial body established in 2015 following the recommendation of the European Commission against Racism and Intolerance of the Council of Europe. NCRI is Greece's most important body on these issues. Among others, it has been assigned with the task of developing policies for the preventing and combating racism and intolerance. It consists of representatives of the relevant Ministries and civil society executives. Therefore, NCRI is the most appropriate body to provide information on issues concerning racism, intolerance and hate crimes, policies, legislation and victim's rights. Moreover, it has already undertaken important actions that need to be disseminated. For this reason, a webpage providing publicly available information on these issues is most useful. The website will be linked with the Webpage of the Ministry of Justice, Transparency and Human Rights. It will be in Greek and in English and have a visits counter. It will be regularly updated.

Schedule of relevant Milestones

Milestone number ¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
MS2	Media Plan	1 - GMJ	3	The launching of the Media Plan will define the strategy of the Awareness Campaign against Racism and Intolerance, and will describe the objectives, the strategy and the media schedule. The Media Plan will determine the best way to convey the message to the target audience, taking into consideration the significance and the human rights context of the message. The Awareness raising Campaign cannot be implemented without the drafting of the Media Plan. The Media Plan will be mentioned and evaluated in the Evaluation Report. The Media Plan will also be electronically available.
MS3	Awareness raising campaign	1 - GMJ	18	The Awareness raising campaign against racism and intolerance will be conducted based on the Media Plan. The campaign will be one of the elements complementing a comprehensive national strategy. The Campaign and its results will be treated in

Schedule of relevant Milestones

Milestone number ¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
				<p>the Evaluation Report and the Report for European Added Value. The creation of a Media Plan followed by an awareness raising campaign will undoubtedly raise public awareness, leading to preventing and combating racism, intolerance and hate crimes and to reinforcing victims' access to justice. The Web page for the National Council against Racism and Intolerance will complement the latter activity, by constantly providing updated data and information.</p>
MS4	<p>Webpage for the National Council against Racism and Intolerance</p>	<p>1 - GMJ</p>	<p>24</p>	<p>It refers to the Webpage for the National Council against Racism and Intolerance, which will be linked with the Webpage of Ministry of Justice, Transparency and Human Rights, and regularly updated. Currently there is just a banner of NCRI on the Ministry of Justice webpage, providing only the mandate of NCRI. The website will present the National Action Plan against Racism and Intolerance and other relevant material, such as the Guide on Hate Crime Victims' Rights, spots from the awareness raising campaign etc. It will have a visits counter.</p>

Work package number ⁹	WP4	Lead beneficiary ¹⁰	1 - GMJ
Work package title	Capacity and Trust Building		
Start month	1	End month	18

Objectives

- To increase capacity of victims and targeted communities and to build trust towards the authorities in order to address under-reporting of hate crimes
- To increase capacity and to raise awareness of Members of the Parliament to understand and combat racism, intolerance and hate speech
- To increase the capacity of prosecutors to effectively prosecute hate crimes
- To increase capacity of public authorities in order to build a comprehensive strategy against racism, intolerance and hate crimes, by presenting the lessons learned from the elaboration of the first National Action Plan against Racism and Intolerance
- Overall objective: To address the needs in capacity building identified from the project 'Building a Comprehensive Criminal Justice Response to Hate Crime', funded by the European Commission under ref. JUST/2015/RRAC/AG/TRAI/ 9025 and implemented by the Office of Democratic Institutions and Human Rights (ODIHR) of OSCE and the Hellenic Ministry of Justice.

Description of work and role of partners

WP4 - Capacity and Trust Building [Months: 1-18]

GMJ, EPIS, UPSPS

The present Work package includes: A Guide for the Rights of Hate Crime Victims, three (3) Workshops in the Centre of Political Research of Panteion University (two on the rights of victims of hate crimes, based on the Guide for the Rights of Hate Crime Victims, and one concerning the elaboration of the National Action Plan against Racism and Intolerance). It also includes an international One-day-conference in the Hellenic Parliament concerning the role of Members of the Parliaments in combating racism, intolerance, as well as hate speech, six (6) educational meetings of prosecutors with targeted communities, where prosecutors will inform the communities about the rights of victims of hate crimes and the procedures for reporting a crime, and two (2) training courses for public prosecutors concerning hate crimes aiming at their effective investigation and the prosecution of hate crime and cases of hate speech. Following the training conducted by ODIHR in collaboration with Supreme Court's Prosecution Office (Training for Trainers), the prosecutors trained at that occasion will train other prosecutors. In this way, the sustainability and long-term results of the previous project are going to be achieved. All the above action will promote capacity building for prosecutors, public officers and MPs, as well as targeted communities, and will enhance trust building of targeted communities towards the judiciary and law-enforcement authorities. For instance, the educational Meetings of prosecutors with targeted communities, where prosecutors will inform the communities about the rights of victims of hate crimes and the procedures for reporting a crime, will lead to trust building towards the judiciary and law enforcement authorities. In addition to the above, the capacity building and awareness raising activities of the project are expected to have long term results not only for the direct beneficiaries of the respective activities, but also for other members of the respective target group.

Participation per Partner

Partner number and short name	WP4 effort
1 - GMJ	2.50
2 - EPIS	0.50
3 - UPSPS	6.30
Total	9.30

List of deliverables

Deliverable Number¹⁴	Deliverable Title	Lead beneficiary	Type¹⁵	Dissemination level¹⁶	Due Date (in months)¹⁷
D4.1	Guide for the Rights of Hate Crime Victims	1 - GMJ	Report	Public	6
D4.2	Workshop 1	3 - UPSPS	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.3	Workshop 2	2 - EPIS	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.4	Workshop 3	3 - UPSPS	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.5	Training course 1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.6	Training course 2	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.7	Educational meeting 1	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.8	Educational meeting 2	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.9	Educational meeting 3	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.10	Educational meeting 4	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18

List of deliverables

Deliverable Number ¹⁴	Deliverable Title	Lead beneficiary	Type ¹⁵	Dissemination level ¹⁶	Due Date (in months) ¹⁷
D4.11	Educational meeting 5	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.12	Educational meeting 6	1 - GMJ	Other	Confidential, only for members of the consortium (including the Commission Services)	18
D4.13	One-day-conference	2 - EPIS	Other	Confidential, only for members of the consortium (including the Commission Services)	18

Description of deliverables

1. Guide for the Rights of Hate Crime Victims. The Guide will include the existing legal framework concerning the rights of victims of hate crimes and the procedures to be followed by the victims to report hate crimes, as well as a list of all relevant stakeholders. It will include useful information on the rights of victims of hate crimes in order to encourage reporting and to protect victims from secondary victimization. The guide will be drafted by an expert in Greek. It will be printed in a total of 2.000 copies in a A5 size in colour, containing a short text of about 7 pages in Greek and its translation in 9 languages (English, French, Farsi, Urdu, Arabic, Pashto, Albanian, Russian and Georgian). It will be distributed to civil society organizations, targeted communities, the Hellenic Police, prosecutor offices, public hospitals and migrants' Reception Centers (the so called "hot-spots"). The two (2) workshops on the rights of victims of hate crimes which will take place in the Centre of Political Research of Panteion University will be based on the above-mentioned Guide. The Guide will also be used and disseminated during the educational/trust building meetings of prosecutors with targeted communities. Moreover, feedback on the dissemination and impact of the Guide will be included in the Evaluation Report, as well as in the Report on European Added Value. Furthermore, the Guide will also be electronically available.

2. Three (3) capacity building workshops addressed to public officers and members of the targeted communities will take place in the Centre of Political Research of Panteion University. Two (2) of them will refer to the rights of victims of hate crimes, based on the Guide for the Rights of Hate Crime Victims which is a prerequisite for these workshops. In order to address under-reporting, the workshops will try to increase capacity of all targeted communities, provide information on victims' rights and on the procedures to be followed to report hate crimes. The third workshop concerns the elaboration of the National Action Plan against Racism and Intolerance and it will be addressed to civil servants. The workshop will present the Action Plan to the participants aiming at identifying the methodology, the positive outcomes, the challenges and the lessons learned from drafting the National Action Plan against Racism and Intolerance, in order to increase the capacity of public authorities when drafting a comprehensive strategy against racism the intolerance. The results of the three workshops will be elaborated in the Evaluation Report which will assess the project, record the results produced and provide proposals for future actions based on actions implemented.

3. An international One-day-conference concerning the role of Members of the Parliament in combating racism, intolerance, as well as hate speech will take place in the Hellenic Parliament. The role of politicians to combat hate speech, but also to promote legislative initiatives that fight racism and discrimination is considered extremely important. The involvement of members of the Hellenic Parliament will guarantee the effectiveness of future legislation against racism, discrimination and hate crimes and its compliance with international standards. It will also ensure increased awareness in public discourse against hate speech.

Members of the European Parliament, members of the CoE Parliamentary Assembly and international experts (e.g. Members of the European Commission against Racism and Intolerance - ECRI) will participate to the Conference, creating thus a forum for European dialogue. The participants will exchange views and European best practices on the role of Parliaments in combating racism, intolerance and hate speech. The one-day-conference will have live television coverage. Models and mechanisms which can be applied not only regionally or nationally but also EU widely, will be presented. The aim of the conference is to raise awareness and capacity of MPs, in order to combat racism, intolerance and hate speech. Records of the Conference will be kept and presented as well as conclusions in a report. Proposals, effects and deductions of the Conference will be treated both in the Evaluation Report and in the Report on the European Added Value.

4. Six (6) trust building/ educational meetings between public prosecutors and targeted communities will take place in the premises of the communities. Prosecutors will provide information to the communities about the rights of victims of hate crimes and the procedures for reporting a crime, increasing thus victims' access to justice and improving the cooperation between victims, NGOs and law enforcement agents. The prosecutors will meet with the communities in their own premises, in small meetings with a direct, immediate, in-person exchange, in order to build trust towards the judiciary and law enforcement authorities. The Guide for the Rights of Victims of Hate Crimes will also be used and disseminated during the meetings. Feedback of the meetings will be included in the Evaluation Report.

5. Two (2) training courses for public prosecutors. Based on the needs identified by previous projects, namely the project 'Building a Comprehensive Criminal Justice Response to Hate Crime', funded by the European Commission under ref. JUST/2015/RRAC/AG/ TRAI/9025 and implemented by the Office of Democratic Institutions and Human Rights (ODIHR) of OSCE and the Hellenic Ministry of Justice, two "training for trainers" seminars of 20 prosecutors each concerning hate crimes are going to be conducted, so that prosecutors are able to effectively investigate and prosecute hate crime and hate speech cases. The material that will be used has already been produced in the context of the aforementioned project. Moreover, the prosecutors trained at that occasion will train other prosecutors in the future. In this way, the sustainability and long-term results of the trainings are going to be achieved. The related procedure, effects and impact will be presented in the Evaluation Report, as well as the Report on the European Added Value.

D4.1 : Guide for the Rights of Hate Crime Victims [6]

The Guide will include the existing legal framework concerning the rights of victims of hate crimes and the procedures to be followed by the victims to report hate crimes, as well as a list of all relevant stakeholders. The guide will be drafted by an expert in Greek. It will be printed in a total of 2.000 copies in a A5 size in colour. It will contain a short text of about 7 pages in Greek and its translation in 9 languages (English, French, Farsi, Urdu, Arabic, Pashto, Albanian, Russian and Georgian). It will be electronically available as it will be uploaded in the Website of the Ministry of Justice and in the Website for the National Council against Racism and Intolerance.

D4.2 : Workshop 1 [18]

It will take place in the Centre of Political Research of Panteion University. It will concern the rights of victims of hate crimes, based on the Guide for the Rights of Hate Crime Victims where 30 members of all targeted communities will participate. In order to address under-reporting, Workshop 1 will try to increase capacity of all targeted communities, provide information on victims' rights and on the procedures to be followed to report hate crimes. The role of civil society organizations in victims' support will also be presented. The event will last up to one day. There will be 31 questionnaires (30 for the participants and one for the lecturer) containing questions related to whether the workshop has achieved its purpose of capacity and trust building. The spokesmen will be: a person from Panteion University, a person from the Ministry of Justice and the expert who elaborated the Guide for the Rights of Hate Crime Victims. Complementary outputs of the workshop will be: An agenda, a signed presence list, a training material package and presentation of the speakers.

D4.3 : Workshop 2 [18]

It will take place in the Centre of Political Research of Panteion University. It will concern the rights of victims of hate crimes, based on the Guide for the Rights of Hate Crime Victims where 30 members of all targeted communities will participate. In order to address under-reporting, Workshop 2 will try to increase capacity of all targeted communities, provide information on victims' rights and on the procedures to be followed to report hate crimes. The role of civil society organizations in victims' support will also be presented. The event will last up to one day. There will be 31 questionnaires (30 for the participants and one for the lecturer) containing questions related to whether the workshop has achieved its purpose of capacity and trust building. The spokesmen will be: a person from Panteion University, a person from the Ministry of Justice and the expert who elaborated the Guide for the Rights of

Hate Crime Victims. Complementary outputs of the workshop will be: An agenda, a signed presence list, a training material package and presentation of the speakers.

D4.4 : Workshop 3 [18]

The Workshop will concern the elaboration of the National Action Plan against Racism and Intolerance. 30 public officers from all ministries involved will participate. The workshop will aim at identifying the methodology, the positive outcomes, the challenges and the lessons learned from drafting the National Action Plan against Racism and Intolerance, in order to increase the capacity of public authorities when drafting a comprehensive strategy against racism the intolerance. In particular, it will aim at introducing the members of NCRI and other civil servants that are not members of the NCRI to methodologies on elaborating Action Plans on Human Rights (and in particular against Racism and Intolerance), on the process of elaborating the first National Action Plan against Racism and Intolerance, on experiences and best practices from other European States, as well as methods to evaluate the results of the Action Plan. It will be organized by the Centre of Political Research of Panteion University with the cooperation of the National Council against Racism and Intolerance. It will also present the National Action Plan to the participants. There will be 31 questionnaires (30 for the participants and one for the lecturer) containing questions related to whether the workshop has achieved its purpose of strengthening the capacity building of creating of a National Action Plan. The spokesmen will be: a person from Panteion University, the President of NCRI, a person from the Ministry of Justice who is also civil society representative, and the expert who drafted the National Action Plan. Complementary outputs of the workshop will be: An agenda, a signed presence list, a training material package and presentation of the speakers.

D4.5 : Training course 1 [18]

Based on the needs identified by previous projects, namely the project 'Building a Comprehensive Criminal Justice Response to Hate Crime', funded by the European Commission under ref. JUST/2015/RRAC/AG/ TRAI/9025 and implemented by the Office of Democratic Institutions and Human Rights (ODIHR) of OSCE and the Hellenic Ministry of Justice, the present training course for 20 prosecutors conducted by a trained prosecutor concerning hate crimes will take place, so that prosecutors are able to effectively investigate and prosecute hate crime and hate speech cases. Following the training conducted by ODIHR in collaboration with Supreme Court's Prosecution Office (Training for Trainers) for the aforementioned project, the prosecutors trained at that occasion will train other prosecutors. In this way, the sustainability and long-term results of the previous project are going to be achieved. Concerning the choice of Prosecutors who will participate in the training, the Ministry of Justice will request from the Supreme Court Prosecutor to make the selection based on the following criteria: - To give priority to the Special Prosecutors on Hate Crime, - To the geographical spread of the prosecutors who will participate, with special emphasis on the Aegean Islands, - To attain a Gender balance. The procedure of selection or nomination by the judiciary is followed in every activity involving the participation of a judge or prosecutor. The training will last up to one day. There will also be 21 questionnaires (20 for the trainees and one for the trainer). There will also be a briefing on the purposes of the questionnaire stressing out the fact that they are not made to control the prosecutors but to facilitate the project's progress. Complementary outputs of the training course will be: An agenda, a signed presence list, a training material package and presentation of the speakers.

D4.6 : Training course 2 [18]

Based on the needs identified by previous projects, namely the project 'Building a Comprehensive Criminal Justice Response to Hate Crime', funded by the European Commission under ref. JUST/2015/RRAC/AG/ TRAI/9025 and implemented by the Office of Democratic Institutions and Human Rights (ODIHR) of OSCE and the Hellenic Ministry of Justice, the present training course for 20 prosecutors conducted by a trained prosecutor concerning hate crimes will take place, so that prosecutors are able to effectively investigate and prosecute hate crime and hate speech cases. Following the training conducted by ODIHR in collaboration with Supreme Court's Prosecution Office (Training for Trainers) for the aforementioned project, the prosecutors trained at that occasion will train other prosecutors. In this way, the sustainability and long-term results of the previous project are going to be achieved. Concerning the choice of Prosecutors who will participate in the training, the Ministry of Justice will request from the Supreme Court Prosecutor to make the selection based on the following criteria: - To give priority to the Special Prosecutors on Hate Crime, - To the geographical spread of the prosecutors who will participate, with special emphasis on the Aegean Islands, - To attain a Gender balance. The procedure of selection or nomination by the judiciary is followed in every activity involving the participation of a judge or prosecutor. The training will last up to one day. There will also be 21 questionnaires (20 for the trainees and one for the trainer). There will also be a briefing on the purposes of the questionnaire stressing out the fact that they are not made to control the prosecutors but to facilitate the project's progress. Complementary outputs of the workshop will be: An agenda, a signed presence list, a training material package and presentation of the speakers.

D4.7 : Educational meeting 1 [18]

The educational meeting between a prosecutor and 30 members of targeted communities (for instance LGBTIQ groups, refugees, migrants and asylum seekers, persons with disabilities, etc.) will take place at the premises of the Communities. The prosecutor will inform the communities about the rights of victims of hate crimes and the procedures for reporting a crime. The prosecutor will meet with the communities with a direct, immediate, in-person exchange, in order to build trust towards the judiciary and law enforcement authorities, taking into account the key principles on hate crime victims' access to justice, support and protection developed by the EU High Level Group on combating racism, xenophobia and other forms of intolerance. The meeting will last up to one day. There will be 30 questionnaires, in order to process and evaluate the meetings' results and whether the trust building purpose has been achieved. Complementary outputs of the educational meeting will be: An agenda, a signed presence list, a training material package and presentation of the speaker.

D4.8 : Educational meeting 2 [18]

The educational meeting between a prosecutor and 30 members of targeted communities (for instance LGBTIQ groups, refugees, migrants and asylum seekers, persons with disabilities, etc.) will take place at the premises of the Communities. The prosecutor will inform the communities about the rights of victims of hate crimes and the procedures for reporting a crime. The prosecutor will meet with the communities with a direct, immediate, in-person exchange, in order to build trust towards the judiciary and law enforcement authorities, taking into account the key principles on hate crime victims' access to justice, support and protection developed by the EU High Level Group on combating racism, xenophobia and other forms of intolerance. The meeting will last up to one day. There will be 30 questionnaires, in order to process and evaluate the meetings' results and whether the trust building purpose has been achieved. Complementary outputs of the educational meeting will be: An agenda, a signed presence list, a training material package and presentation of the speaker.

D4.9 : Educational meeting 3 [18]

The educational meeting between a prosecutor and 30 members of targeted communities (for instance LGBTIQ groups, refugees, migrants and asylum seekers, persons with disabilities, etc.) will take place at the premises of the Communities. The prosecutor will inform the communities about the rights of victims of hate crimes and the procedures for reporting a crime. The prosecutor will meet with the communities with a direct, immediate, in-person exchange, in order to build trust towards the judiciary and law enforcement authorities, taking into account the key principles on hate crime victims' access to justice, support and protection developed by the EU High Level Group on combating racism, xenophobia and other forms of intolerance. The meeting will last up to one day. There will be 30 questionnaires, in order to process and evaluate the meetings' results and whether the trust building purpose has been achieved. Complementary outputs of the educational meeting will be: An agenda, a signed presence list, a training material package and presentation of the speaker.

D4.10 : Educational meeting 4 [18]

The educational meeting between a prosecutor and 30 members of targeted communities (for instance LGBTIQ groups, refugees, migrants and asylum seekers, persons with disabilities, etc.) will take place at the premises of the Communities. The prosecutor will inform the communities about the rights of victims of hate crimes and the procedures for reporting a crime. The prosecutor will meet with the communities with a direct, immediate, in-person exchange, in order to build trust towards the judiciary and law enforcement authorities, taking into account the key principles on hate crime victims' access to justice, support and protection developed by the EU High Level Group on combating racism, xenophobia and other forms of intolerance. The meeting will last up to one day. There will be 30 questionnaires, in order to process and evaluate the meetings' results and whether the trust building purpose has been achieved. Complementary outputs of the educational meeting will be: An agenda, a signed presence list, a training material package and presentation of the speaker.

D4.11 : Educational meeting 5 [18]

The educational meeting between a prosecutor and 30 members of targeted communities (for instance LGBTIQ groups, refugees, migrants and asylum seekers, persons with disabilities, etc.) will take place at the premises of the Communities. The prosecutor will inform the communities about the rights of victims of hate crimes and the procedures for reporting a crime. The prosecutor will meet with the communities with a direct, immediate, in-person exchange, in order to build trust towards the judiciary and law enforcement authorities, taking into account the key principles on hate crime victims' access to justice, support and protection developed by the EU High Level Group on combating racism, xenophobia and other forms of intolerance. The meeting will last up to one day. There will be 30 questionnaires, in order to process and evaluate the meetings' results and whether the trust building purpose has been achieved. Complementary outputs of the educational meeting will be: An agenda, a signed presence list, a training material package and presentation of the speaker.

D4.12 : Educational meeting 6 [18]

The educational meeting between a prosecutor and 30 members of targeted communities (for instance LGBTIQ groups, refugees, migrants and asylum seekers, persons with disabilities, etc.) will take place at the premises of the Communities. The prosecutor will inform the communities about the rights of victims of hate crimes and the procedures for reporting a crime. The prosecutor will meet with the communities with a direct, immediate, in-person exchange, in order to build trust towards the judiciary and law enforcement authorities, taking into account the key principles on hate crime victims' access to justice, support and protection developed by the EU High Level Group on combating racism, xenophobia and other forms of intolerance. The meeting will last up to one day. There will be 30 questionnaires, in order to process and evaluate the meetings' results and whether the trust building purpose has been achieved. Complementary outputs of the educational meeting will be: An agenda, a signed presence list, a training material package and presentation of the speaker.

D4.13 : One-day-conference [18]

An international one-day-conference will take place in the Hellenic Parliament concerning the role of Members of the Parliaments in combatting racism, intolerance, as well as hate speech. Members of the Hellenic Parliament, Members of the European Parliament, Members of the CoE Parliamentary Assembly and international experts (e.g. Members of the European Commission against Racism and Intolerance - ECRI) will participate. The participants will exchange views and European best practices on the role of Parliaments in combatting racism, intolerance and hate speech, in order to raise awareness and build capacity for Members of the Parliaments. There will be 15-20 speakers. There will be live TV coverage for the one-day-Conference, broadcasted by the Hellenic Parliament's channel. A report will follow the one-day-Conference concerning the Parliament Members' role in combatting racism. Complementary outputs of the one-day-conference will be: An agenda, a signed presence list, and presentation of the speakers.

Schedule of relevant Milestones

Milestone number ¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
MS5	Workshops in the Centre of Political Research of Panteion University	3 - UPSPS	18	Three (3) capacity building workshops addressing to communities and respective NGOs concerning the rights of victims will take place in the Centre of Political Research of Panteion University. Two (2) of them will refer to the rights of victims of hate crimes, based on the Guide for the Rights of Hate Crime Victims. In order to address under-reporting, the workshops will try to increase capacity of all targeted communities, provide information on victims' rights and on the procedures to be followed to report hate crimes. The third one concerns the elaboration of the National Action Plan against Racism and Intolerance. The workshop will present the Action Plan to the participants (public officers) aiming at identifying the methodology, the positive

Schedule of relevant Milestones

Milestone number ¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
				<p>outcomes, the challenges and the lessons learned from drafting the National Action Plan against Racism and Intolerance, in order to increase the capacity of public authorities when drafting a comprehensive strategy against racism the intolerance. The results of the three workshops will be elaborated in the Evaluation Report which will assess the project, record the results produced and provide proposals for future actions based on actions implemented.</p>
MS6	Guide for the Rights of Hate Crime Victims	1 - GMJ	6	<p>It refers to the creation of a Guide for the Rights of Hate Crime Victims. The Guide will include useful information on the rights of victims of hate crimes in order to encourage reporting and to protect victims from secondary victimization. The Guide will be translated in nine (9) languages (English, French, Farsi, Urdu, Arabic, Pashto, Albanian, Russian and Georgian). It will be printed in a total of 2.000 copies. The Guide on the Rights of Hate crimes victims will be distributed to civil society organizations, targeted communities, the Hellenic Police, prosecutor offices, public hospitals and migrants' Reception Centers (the so called "hot-spots"). The two (2) workshops on the rights of victims of hate crimes which will take place in the Centre of Political Research of Panteion University will be based on the above-mentioned Guide. The Guide will also be used and disseminated during the educational/trust building meetings of prosecutors with targeted communities.</p>

Schedule of relevant Milestones

Milestone number ¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
				Moreover, feedback on the dissemination and impact of the Guide will be included in the Evaluation Report, as well as in the Report on European Added Value. The Guide, will also be electronically available.
MS7	Training courses for Public Prosecutors	1 - GMJ	18	Based on the needs identified by previous projects, namely the project 'Building a Comprehensive Criminal Justice Response to Hate Crime', funded by the European Commission under ref. JUST/2015/RRAC/AG/TRAI/9025 and implemented by the Office of Democratic Institutions and Human Rights (ODIHR) of OSCE and the Hellenic Ministry of Justice, two training courses for 40 prosecutors concerning hate crimes are going to be conducted, so that prosecutors are able to effectively investigate and prosecute hate crime and hate speech cases. Based on the results of the aforementioned project, we consider that one of the most useful actions that were implemented have been the trainings (capacity building actions) for prosecutors. These trainings have increased the alertness of justice's response to hate crimes. In particular, two "training for trainers" seminars of 20 prosecutors each will be conducted by trained prosecutors and experts. The material that will be used has already been produced in the context of the aforementioned project. Moreover, the prosecutors trained at that occasion will train other prosecutors in the future. In this way, the sustainability and long-term

Schedule of relevant Milestones

Milestone number ¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
				<p>results of the trainings are going to be achieved. The related procedure, effects and impact will be presented in the Evaluation Report, as well as the Report on the European Added Value.</p>
MS8	One-day-Conference	2 - EPIS	18	<p>An international conference concerning the role of Members of the Parliament in combatting racism, intolerance, as well as hate speech will take place in the Hellenic Parliament. The role of politicians to combat hate speech, but also to promote legislative initiatives that fight racism and discrimination is considered extremely important. For this reason and taken into consideration that an Agreement for a comprehensive response to hate crimes has been concluded in the context of the project 'Building a Comprehensive Criminal Justice Response to Hate Crime' between the Administration, the Judiciary and Civil Society, the involvement of the Parliament will fill in the gap for a comprehensive strategy against racism, intolerance and hate crimes. Moreover, the involvement of members of the Hellenic Parliament will guarantee the effectiveness of future legislation against racism, discrimination and hate crimes and its compliance with international standards. It will also ensure increased awareness in public discourse against hate speech. Members of the European Parliament, members of the CoE Parliamentary Assembly and international experts (e.g. Members of the European</p>

Schedule of relevant Milestones

Milestone number ¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
				<p>Commission against Racism and Intolerance - ECRI) will participate to the Conference, creating thus a forum for European dialogue. The participants will exchange views and European best practices on the role of Parliaments in combatting racism, intolerance and hate speech. The one-day-conference will have live television coverage. Models and mechanisms which can be applied not only regionally or nationally but also EU widely, will be presented. The records of the Conference will be kept and presented as well as conclusions made in a report. Proposals, effects and deductions of the Conference will be treated both in the Evaluation Report and in the Report on the European Added Value.</p>
MS9	Educational Meetings	1 - GMJ	18	<p>Six (6) trust building/ educational meetings between public prosecutors and targeted communities will take place in the premises of the communities. Prosecutors will provide information to the communities about the rights of victims of hate crimes and the procedures for reporting a crime, thus increasing victims' access to justice and improving the cooperation between victims, NGOs and law enforcement agents. The prosecutors will meet with the communities in their own premises, in small meetings with a direct, immediate, in-person exchange, in order to build trust towards the judiciary and law enforcement authorities, taking into account the key guiding principles on hate crime victims' access to</p>

Schedule of relevant Milestones

Milestone number¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
				justice, support and protection developed by the EU High Level Group on combating racism, xenophobia and other forms of intolerance. The Guide for the Rights of Victims of Hate Crimes will also be used and disseminated during the meetings. Feedback of the meetings will be included in the Evaluation Report which will also analyze existing data related for instance to crime reporting, effect/impact of the meetings, conclusions and proposals.

Work package number ⁹	WP5	Lead beneficiary ¹⁰	3 - UPSPS
Work package title	Program evaluation		
Start month	1	End month	24

Objectives

To provide a transparent basis for accountability for results, for decision-making on policies and programmes, for learning, for drawing lessons and for improvement.
 To monitor and evaluate the programme, to assess the overall benefits of the present project and to present proposals based on implemented actions.

Description of work and role of partners

WP5 - Program evaluation [Months: 1-24]

UPSPS

The present Work Package contains an Evaluation Report and a Report for the European Added Value. The final evaluation report will describe how the programme was monitored. It refers to an overall evaluation of the project with a record of the results produced, proposals for future actions based on actions implemented, positive impacts and sustainability of results. The Report for the European added value will concern European added value, lessons learned and best practices that derive from the project, including proposals and actions that need to be undertaken for results' sustainability, and a SWOT analysis.

As the credibility and objectivity of monitoring and evaluation reports depend very much on the independence and the expertise of the evaluators, the Centre for Political Research of Panteion University which has been established as a 'Laboratory' of Political Sociology and Comparative Political Analysis", will undertake this project ensuring the objectivity and reliability of both aforementioned reports.

Participation per Partner

Partner number and short name	WP5 effort
3 - UPSPS	18.00
Total	18.00

List of deliverables

Deliverable Number ¹⁴	Deliverable Title	Lead beneficiary	Type ¹⁵	Dissemination level ¹⁶	Due Date (in months) ¹⁷
D5.1	Evaluation report	3 - UPSPS	Report	Public	24
D5.2	Report for the European Added Value	3 - UPSPS	Report	Public	24

Description of deliverables

1. The Evaluation Report will be written in Greek and translated in English. It will constitute an overall evaluation of the project with a record of the results produced, proposals for future actions based on actions implemented, positive impacts and sustainability of results, in order to measure its effectiveness and estimate the sustainability of results. The Report will describe the lessons learned and highlight the best practices. It will be elaborated by the Centre for Political Research of the Panteion University of Social and Political Sciences, which will monitor and gather all documents (questionnaires, reports, reviews, etc.) and electronic files, as to process them and proceed to the afore-

mentioned outcomes. It will also focus on the issues of sustainability and long-term results and will provide proposals to guarantee such results. Furthermore, it will be electronically available.

2. The Report for the European added value will be written in Greek and translated in English, and will propose lessons learned and best practices derived by the project, including proposals and actions that need to be undertaken for the results' sustainability. The issue of sustainability and long-term results will be of major importance. European best practices that will be considered for the implementation of the project will also be highlighted, as well as challenges, difficulties and problems that might possibly arise when forming such a comprehensive strategy. The results of the Report on the European Added Value can be disseminated in other EU Members states in order to ensure the trans-national impact of the project, taking into consideration that positive changes in one country can motivate reform in other EU member States. It will involve all branches of the state (the executive, the legislative, the judiciary) and civil society, being thus a useful tool for all EU member states when designing a comprehensive strategy to combat racism, intolerance and hate crimes. The Report will be elaborated by the Centre for Political Research of the Panteion University of Social and Political Sciences, which will monitor and gather all documents (questionnaires, reports, reviews, etc.) and electronic files. It will also be electronically available.

D5.1 : Evaluation report [24]

The Centre for Political Research of Panteion University of Social and Political Sciences will elaborate an Evaluation Report concerning the project's progress and implementation. The Report will be printed in Greek and translated in English. It will also be available electronically and distributed in 10 copies. It will include an overall evaluation of the project, focusing mainly on its effectiveness, with a record of the results produced, the policies that were developed, proposals for future actions based on actions implemented, positive impacts and sustainability of results.

D5.2 : Report for the European Added Value [24]

The report will concern European added value, lessons learned and best practices that derive from the project, including proposals and actions that need to be undertaken for results' sustainability, and a SWOT analysis. It will be printed in Greek and translated in English. It will be available electronically and distributed in 30 copies. The Report on the European added value will be a useful tool for all EU member states when designing a comprehensive strategy to combat racism, intolerance and hate crimes. The results of the Report on the European Added Value can be disseminated in other EU Members states in order to ensure the trans-national impact of the project, taking into consideration that positive changes in one country can motivate reform in other EU member States.

Schedule of relevant Milestones

Milestone number¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
MS10	Evaluation Report	3 - UPSPS	24	The Evaluation Report constitutes an overall evaluation of the project with a record of the results produced, proposals for future actions based on actions implemented, positive impacts and sustainability of results, in order to measure its effectiveness and estimate the sustainability of results. The Report will describe the lessons learned and highlight the best practices. It will be elaborated by the Centre for Political Research of the Panteion University of Social and Political Sciences, which will monitor and gather all documents (questionnaires,

Schedule of relevant Milestones

Milestone number ¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
				reports, reviews, etc.) and electronic files, as to process them and proceed to the afore-mentioned outcomes. It will also focus on the issues of sustainability and long-term results and will provide proposals to guarantee such results. Furthermore, It will also be electronically available.
MS11	Report on the European Added Value	3 - UPSPS	24	Our proposal also contains a report on the European Added Value, proposing lessons learned and best practices derived by the project, including proposals and actions that need to be undertaken for the results' sustainability. The Report will be elaborated by the Centre for Political Research of the Panteion University of Social and Political Sciences, which will monitor and gather all documents (questionnaires, reports, reviews, etc.) and electronic files. It will thoroughly present lessons learned and transferable best practices that derive from the project, including proposals and actions that need to be undertaken for results' sustainability, as well as a SWOT analysis. The issue of sustainability and long-term results will be of major importance. European best practices that will be considered for the implementation of the project will also be highlighted, as well as challenges, difficulties and problems that might possibly arise when forming such a comprehensive strategy. The results of the Report on the European Added Value can be disseminated in other EU Members states

Schedule of relevant Milestones

Milestone number¹⁸	Milestone title	Lead beneficiary	Due Date (in months)	Means of verification
				<p>in order to ensure the trans-national impact of the project, taking into consideration that positive changes in one country can motivate reform in other EU member States, since lessons learned issued from such an effort are valuable for many EU member states that are also facing similar challenges and also intend to form a comprehensive strategy. Furthermore, the Report will also be electronically available.</p>

1.3.4. WT4 List of milestones

Milestone number ¹⁸	Milestone title	WP number ⁹	Lead beneficiary	Due Date (in months) ¹⁷	Means of verification
MS1	National Action Plan against Racism and Intolerance	WP2	1 - GMJ	1	<p>The National Action Plan against Racism and Intolerance will contribute to the development of a comprehensive strategy against racism, intolerance and hate crime, by recording all respective institutional interventions based on reliable data and needs, while taking into consideration European best practices. The Action Plan will present a comprehensive national strategy against racism, intolerance and hate crimes, by presenting the necessary institutional interventions of all public authorities involved (not only of the Ministry of Justice), with specific targets and benchmarks. The Action Plan also constitutes not only a prerequisite for the Workshop that will take place in the Centre of Political Research of Panteion University with the support of NCRI about its elaboration, aiming at identifying the methodology, the positive outcomes, the challenges and the lessons learned from drafting the Action Plan, but it is also a prerequisite for the Evaluation Report and the Report for the European Added Value as well. The first step in order to draft the National Action Plan Against Racism and Intolerance is to consult with the National Council against Racism and Intolerance (NCRI) on the methodology of the Action Plan. The NCRI has already discussed the matter and has concluded that the Action Plan will include actions planned by the Ministries and the NCRI itself. Then, the Plan will be drafted according</p>

Milestone number ¹⁸	Milestone title	WP number ⁹	Lead beneficiary	Due Date (in months) ¹⁷	Means of verification
					to international standards. The draft Action Plan will be submitted to NCRI for comments and observations and it will be revised based on these comments.
MS2	Media Plan	WP3	1 - GMJ	3	The launching of the Media Plan will define the strategy of the Awareness Campaign against Racism and Intolerance, and will describe the objectives, the strategy and the media schedule. The Media Plan will determine the best way to convey the message to the target audience, taking into consideration the significance and the human rights context of the message. The Awareness raising Campaign cannot be implemented without the drafting of the Media Plan. The Media Plan will be mentioned and evaluated in the Evaluation Report. The Media Plan will also be electronically available.
MS3	Awareness raising campaign	WP3	1 - GMJ	18	The Awareness raising campaign against racism and intolerance will be conducted based on the Media Plan. The campaign will be one of the elements complementing a comprehensive national strategy. The Campaign and its results will be treated in the Evaluation Report and the Report for European Added Value. The creation of a Media Plan followed by an awareness raising campaign will undoubtedly raise public awareness, leading to preventing and combating racism, intolerance and hate crimes and to reinforcing victims' access to justice. The Web page for the National Council against Racism and Intolerance will complement the latter activity,

Milestone number ¹⁸	Milestone title	WP number ⁹	Lead beneficiary	Due Date (in months) ¹⁷	Means of verification
					by constantly providing updated data and information.
MS4	Webpage for the National Council against Racism and Intolerance	WP3	1 - GMJ	24	It refers to the Webpage for the National Council against Racism and Intolerance, which will be linked with the Webpage of Ministry of Justice, Transparency and Human Rights, and regularly updated. Currently there is just a banner of NCRI on the Ministry of Justice webpage, providing only the mandate of NCRI. The website will present the National Action Plan against Racism and Intolerance and other relevant material, such as the Guide on Hate Crime Victims' Rights, spots from the awareness raising campaign etc. It will have a visits counter.
MS5	Workshops in the Centre of Political Research of Panteion University	WP4	3 - UPSPS	18	Three (3) capacity building workshops addressing to communities and respective NGOs concerning the rights of victims will take place in the Centre of Political Research of Panteion University. Two (2) of them will refer to the rights of victims of hate crimes, based on the Guide for the Rights of Hate Crime Victims. In order to address under-reporting, the workshops will try to increase capacity of all targeted communities, provide information on victims' rights and on the procedures to be followed to report hate crimes. The third one concerns the elaboration of the National Action Plan against Racism and Intolerance. The workshop will present the Action Plan to the participants (public officers) aiming at identifying the methodology, the positive outcomes, the challenges and the lessons learned from drafting the National

Milestone number ¹⁸	Milestone title	WP number ⁹	Lead beneficiary	Due Date (in months) ¹⁷	Means of verification
					<p>Action Plan against Racism and Intolerance, in order to increase the capacity of public authorities when drafting a comprehensive strategy against racism the intolerance. The results of the three workshops will be elaborated in the Evaluation Report which will assess the project, record the results produced and provide proposals for future actions based on actions implemented.</p>
MS6	Guide for the Rights of Hate Crime Victims	WP4	1 - GMJ	6	<p>It refers to the creation of a Guide for the Rights of Hate Crime Victims. The Guide will include useful information on the rights of victims of hate crimes in order to encourage reporting and to protect victims from secondary victimization. The Guide will be translated in nine (9) languages (English, French, Farsi, Urdu, Arabic, Pashto, Albanian, Russian and Georgian). It will be printed in a total of 2.000 copies. The Guide on the Rights of Hate crimes victims will be distributed to civil society organizations, targeted communities, the Hellenic Police, prosecutor offices, public hospitals and migrants' Reception Centers (the so called "hot-spots"). The two (2) workshops on the rights of victims of hate crimes which will take place in the Centre of Political Research of Panteion University will be based on the above-mentioned Guide. The Guide will also be used and disseminated during the educational/trust building meetings of prosecutors with targeted communities. Moreover, feedback on the dissemination and impact of the Guide will be included in the Evaluation Report, as well</p>

Milestone number ¹⁸	Milestone title	WP number ⁹	Lead beneficiary	Due Date (in months) ¹⁷	Means of verification
					as in the Report on European Added Value. The Guide, will also be electronically available.
MS7	Training courses for Public Prosecutors	WP4	1 - GMJ	18	Based on the needs identified by previous projects, namely the project 'Building a Comprehensive Criminal Justice Response to Hate Crime', funded by the European Commission under ref. JUST/2015/RRAC/AG/TRAI/9025 and implemented by the Office of Democratic Institutions and Human Rights (ODIHR) of OSCE and the Hellenic Ministry of Justice, two training courses for 40 prosecutors concerning hate crimes are going to be conducted, so that prosecutors are able to effectively investigate and prosecute hate crime and hate speech cases. Based on the results of the aforementioned project, we consider that one of the most useful actions that were implemented have been the trainings (capacity building actions) for prosecutors. These trainings have increased the alertness of justice's response to hate crimes. In particular, two "training for trainers" seminars of 20 prosecutors each will be conducted by trained prosecutors and experts. The material that will be used has already been produced in the context of the aforementioned project. Moreover, the prosecutors trained at that occasion will train other prosecutors in the future. In this way, the sustainability and long-term results of the trainings are going to be achieved. The related procedure, effects and impact will be presented in the Evaluation Report, as well

Milestone number ¹⁸	Milestone title	WP number ⁹	Lead beneficiary	Due Date (in months) ¹⁷	Means of verification
					as the Report on the European Added Value.
MS8	One-day-Conference	WP4	2 - EPIS	18	<p>An international conference concerning the role of Members of the Parliament in combatting racism, intolerance, as well as hate speech will take place in the Hellenic Parliament. The role of politicians to combat hate speech, but also to promote legislative initiatives that fight racism and discrimination is considered extremely important. For this reason and taken into consideration that an Agreement for a comprehensive response to hate crimes has been concluded in the context of the project 'Building a Comprehensive Criminal Justice Response to Hate Crime' between the Administration, the Judiciary and Civil Society, the involvement of the Parliament will fill in the gap for a comprehensive strategy against racism, intolerance and hate crimes. Moreover, the involvement of members of the Hellenic Parliament will guarantee the effectiveness of future legislation against racism, discrimination and hate crimes and its compliance with international standards. It will also ensure increased awareness in public discourse against hate speech. Members of the European Parliament, members of the CoE Parliamentary Assembly and international experts (e.g. Members of the European Commission against Racism and Intolerance - ECRI) will participate to the Conference, creating thus a forum for European dialogue. The participants will exchange</p>

Milestone number ¹⁸	Milestone title	WP number ⁹	Lead beneficiary	Due Date (in months) ¹⁷	Means of verification
					views and European best practices on the role of Parliaments in combatting racism, intolerance and hate speech. The one-day-conference will have live television coverage. Models and mechanisms which can be applied not only regionally or nationally but also EU widely, will be presented. The records of the Conference will be kept and presented as well as conclusions made in a report. Proposals, effects and deductions of the Conference will be treated both in the Evaluation Report and in the Report on the European Added Value.
MS9	Educational Meetings	WP4	1 - GMJ	18	Six (6) trust building/ educational meetings between public prosecutors and targeted communities will take place in the premises of the communities. Prosecutors will provide information to the communities about the rights of victims of hate crimes and the procedures for reporting a crime, thus increasing victims' access to justice and improving the cooperation between victims, NGOs and law enforcement agents. The prosecutors will meet with the communities in their own premises, in small meetings with a direct, immediate, in-person exchange, in order to build trust towards the judiciary and law enforcement authorities, taking into account the key guiding principles on hate crime victims' access to justice, support and protection developed by the EU High Level Group on combating racism, xenophobia and other forms of intolerance. The Guide for the Rights of Victims of Hate Crimes will also be used and

Milestone number ¹⁸	Milestone title	WP number ⁹	Lead beneficiary	Due Date (in months) ¹⁷	Means of verification
					disseminated during the meetings. Feedback of the meetings will be included in the Evaluation Report which will also analyze existing data related for instance to crime reporting, effect/impact of the meetings, conclusions and proposals.
MS10	Evaluation Report	WP5	3 - UPSPS	24	The Evaluation Report constitutes an overall evaluation of the project with a record of the results produced, proposals for future actions based on actions implemented, positive impacts and sustainability of results, in order to measure its effectiveness and estimate the sustainability of results. The Report will describe the lessons learned and highlight the best practices. It will be elaborated by the Centre for Political Research of the Panteion University of Social and Political Sciences, which will monitor and gather all documents (questionnaires, reports, reviews, etc.) and electronic files, as to process them and proceed to the afore-mentioned outcomes. It will also focus on the issues of sustainability and long-term results and will provide proposals to guarantee such results. Furthermore, It will also be electronically available.
MS11	Report on the European Added Value	WP5	3 - UPSPS	24	Our proposal also contains a report on the European Added Value, proposing lessons learned and best practices derived by the project, including proposals and actions that need to be undertaken for the results' sustainability. The Report will be elaborated by the Centre for Political Research of the Panteion University of Social and Political Sciences, which

Milestone number ¹⁸	Milestone title	WP number ⁹	Lead beneficiary	Due Date (in months) ¹⁷	Means of verification
					<p>will monitor and gather all documents (questionnaires, reports, reviews, etc.) and electronic files. It will thoroughly present lessons learned and transferable best practices that derive from the project, including proposals and actions that need to be undertaken for results' sustainability, as well as a SWOT analysis. The issue of sustainability and long-term results will be of major importance. European best practices that will be considered for the implementation of the project will also be highlighted, as well as challenges, difficulties and problems that might possibly arise when forming such a comprehensive strategy. The results of the Report on the European Added Value can be disseminated in other EU Members states in order to ensure the transnational impact of the project, taking into consideration that positive changes in one country can motivate reform in other EU member States, since lessons learned issued from such an effort are valuable for many EU member states that are also facing similar challenges and also intend to form a comprehensive strategy. Furthermore, the Report will also be electronically available.</p>

1.3.5. WT5 Critical Implementation risks and mitigation actions

Risk number	Description of risk	WP Number	Proposed risk-mitigation measures
1	Delays at providing all required data in time. Project reporting is not adequate in order to identify project progress properly.	WP1	- Provide clear guidance on deadlines regarding for instance the project progress reports. - Inform the partners in time and in detail about the reporting process. - Monitor the reporting of the project partners.
2	Conflict between partners. Disagreement over project issues at the executive level.	WP1	Regular communication and bimonthly meetings with the partners in order to define the best common line/strategy and address all the differences.
3	Delays of the stakeholders involved to provide input or data.	WP1	Define a clear methodology, provide clear and precise information to the stakeholders, keep a constant communication, set specific deadlines.
4	Difficulties in identifying the participants and engaging them through the deliverables of this WP (for instance in identifying the key public officers for the workshop on the elaboration of the Action Plan)	WP4	Difficulties in identifying the participants and engaging them through the deliverables (for instance not to identify the key public officers for the workshop on the elaboration of the Action Plan). To deal with that risk we will define the participants in early stages of the project and schedule the plan for the workshops, conference, meetings and courses in early stage in order to ensure broad participation. In particular, we will inform early targeted communities and NGOs for the workshops on victims' rights. We will also engage the members of NCRI for the workshop on the elaboration of the Action Plan, since the NCRI will be involved in the future Action Plans as well. Concerning the workshops on victims' rights, we have already contacted the Racist Violence Recording Network (an umbrella organization of 46 NGOs) to explore the interest of NGOs in such workshops and indeed some NGOs expressed their interest in advance. Therefore, we consider that there is a strong interest in such meetings where participants will gain knowledge on their rights. Concerning the workshop on the Action Plan, the members of the NCRI will participate in the workshop as part of their duties. Moreover, members from other sectors of the administration will participate in order to gain useful knowledge on how to develop a National Action Plan, which is a common tool for the elaboration of national policies. Concerning the one-day-conference, we will define and approach the participants in early stages of the project in order to raise awareness and engage them to the benefits of their participation. MPs from the European Parliament and the Parliamentary Assembly of the CoE will also be engaged. This will motivate participation from various political groups and parties. We believe that apart from MPs from far-right political parties, MPs from all other

Risk number	Description of risk	WP Number	Proposed risk-mitigation measures
			<p>political parties will be interested to participate to the conference to show their commitment in the values of a democratic society. Concerning the recruiting and retaining of 40 public prosecutors for the training courses, the Supreme Court Prosecutor has expressed the will to conduct more training seminars on hate crimes. The commitment of the Supreme Court Prosecutor gives the example to the other prosecutors and insures as well the prosecutor's participation to the trainings. Moreover, the training course will be organized in cooperation with the Supreme Court Prosecutor who is the superior in rank prosecutor. Training seminars organized by the Supreme Court Prosecutor are always very popular to prosecutors from all over Greece, especially if travel expenses are covered. Concerning seminars, we already have the will, the training material and the expertise for such a training, and funding will facilitate its realization. Concerning the questionnaires, there will be a briefing on their purposes stressing out the fact that they are not made to control the prosecutors but to facilitate the project's progress.</p>
5	<p>Difficulty in identifying motivated participants for the International One-day-conference.</p>	WP4	<p>Define and approach the participants in early stages of the project in order to raise awareness and engage them to the benefits of their participation. MPs from the European Parliament and the Parliamentary Assembly of the CoE will also be engaged. This will motivate participation from various political groups and parties.</p>
6	<p>Recruiting and retaining of 40 public prosecutors for the training courses: - Risk of them declining to take part - Risk to react to the filling in of the questionnaires</p>	WP4	<p>The Supreme Court Prosecutor has expressed the will to conduct more training seminars on hate crimes. However, lack of resources to cover travel and accommodation costs is an impediment, especially for prosecutors who are serving in distant Prosecutors' Offices, such as the Aegean islands. For this reason, we have included training seminars to our proposal. We already have the will, the training material (ODIHR's material that was used for the training (PAHCT) has been translated and customized for Greece) and the expertise for such a training and funding will facilitate its realization. There will also be a briefing on the purposes of the questionnaire stressing out the fact that they are not made to check on the prosecutors but to facilitate the project's progress.</p>
7	<p>Risk if the Media plan does not take into account the specific purpose of the awareness raising campaign.</p>	WP3	<p>Clear guidance and instruction to subcontractor who assumes the drafting of the Media Plan. Other awareness raising campaigns against racism and discrimination of States or international NGOs may be taken into consideration, so that the</p>

Risk number	Description of risk	WP Number	Proposed risk-mitigation measures
			subcontractor has a clear understanding of the aim and spirit of the campaign.
8	Delays in gathering the material that will be uploaded in NCRI's Webpage.	WP3	Clear planning and implementation with all involved Partner in order to respect all deadlines (for instance for the drafting of the National Action Plan against Racism and Intolerance), by keeping a project's agenda and regularly communicating with the stakeholders involved.
9	Delays in collecting and processing all collected data (files, questionnaires, documents, etc.)	WP5	Collect all data as soon as they are completed. Draft and keep a scheduled plan related to data process.
10	Risk that public prosecutors who will attend the educational meetings with the communities decline to take part, or, if they take part, don't have good communication skills.	WP4	Concerning the educational/trust building meetings of prosecutors with CSOs, our aim is to establish good communication channels between Special Prosecutors on Hate Crimes and targeted communities. E.g. the Special Prosecutor on Hate Crimes of Thessalonica could meet with the Jewish Community which has a strong presence in the city. The Supreme Court Prosecutor has already expressed her agreement to conduct such meetings. Therefore, having ensured the commitment of the leadership, the implementation of this action won't be jeopardized. Moreover a person from the Ministry of Justice will work as a facilitator during the meetings and will urge the participants to ask questions to the Prosecutor. The Guide on the Rights of Victims of Hate Crimes will be also used and disseminated.
11	Awareness Raising Campaign: - Not to identify the right tools and channels to use - For the campaign to be considered a stand-alone initiative - Not to develop the campaign message which best serves the goals of the proposal and the project - Not to be sustainable and successful.	WP3	- Choose the appropriate and experienced campaign developer and provide him with clear guidance and instructions. - Prepare all the details in the Media Plan - Use other means as well in order to convey the message (National Action Plan, Guide for the Rights of Hate Crime Victims, etc.) - Monitor the whole making of the campaign process, evaluate the campaign, collect the best practice examples in order to contribute to the creation of a community of learning exchange - Ensure that all stakeholders involved have the same understanding of what they are working towards.

1.3.6. WT6 Summary of project effort in person-months

	WP1	WP2	WP3	WP4	WP5	Total Person/Months per Participant
1 - GMJ	24.10	6	22	2.50	0	54.60
2 - EPIS	0	0	0	0.50	0	0.50
3 - UPSPS	0	0	0	6.30	18	24.30
Total Person/Months	24.10	6	22	9.30	18	79.40

1.3.7. WT7 Tentative schedule of project reviews

Review number ¹⁹	Tentative timing	Planned venue of review	Comments, if any
RV1	24	To be decided.	In the framework of the evaluation of the final report, a review may take place.

1. Project number

The project number has been assigned by the Commission as the unique identifier for your project. It cannot be changed. The project number **should appear on each page of the grant agreement preparation documents (part A and part B)** to prevent errors during its handling.

2. Project acronym

Use the project acronym as given in the submitted proposal. It can generally not be changed. The same acronym **should appear on each page of the grant agreement preparation documents (part A and part B)** to prevent errors during its handling.

3. Project title

Use the title (preferably no longer than 200 characters) as indicated in the submitted proposal. Minor corrections are possible if agreed during the preparation of the grant agreement.

4. Starting date

Unless a specific (fixed) starting date is duly justified and agreed upon during the preparation of the Grant Agreement, the project will start on the first day of the month following the entry into force of the Grant Agreement (NB : entry into force = signature by the Commission). Please note that if a fixed starting date is used, you will be required to provide a written justification.

5. Duration

Insert the duration of the project in full months.

6. Call (part) identifier

The Call (part) identifier is the reference number given in the call or part of the call you were addressing, as indicated in the publication of the call in the Official Journal of the European Union. You have to use the identifier given by the Commission in the letter inviting to prepare the grant agreement.

7. Abstract

8. Project Entry Month

The month at which the participant joined the consortium, month 1 marking the start date of the project, and all other start dates being relative to this start date.

9. Work Package number

Work package number: WP1, WP2, WP3, ..., WPn

10. Lead beneficiary

This must be one of the beneficiaries in the grant (not a third party) - Number of the beneficiary leading the work in this work package

11. Person-months per work package

The total number of person-months allocated to each work package.

12. Start month

Relative start date for the work in the specific work packages, month 1 marking the start date of the project, and all other start dates being relative to this start date.

13. End month

Relative end date, month 1 marking the start date of the project, and all end dates being relative to this start date.

14. Deliverable number

Deliverable numbers: D1 - Dn

15. Type

Please indicate the type of the deliverable using one of the following codes:

R	Document, report
DEM	Demonstrator, pilot, prototype
DEC	Websites, patent filings, videos, etc.
OTHER	
ETHICS	Ethics requirement
ORDP	Open Research Data Pilot
DATA	data sets, microdata, etc.

16. Dissemination level

Please indicate the dissemination level using one of the following codes:

- PU Public
- CO Confidential, only for members of the consortium (including the Commission Services)
- EU-RES Classified Information: RESTREINT UE (Commission Decision 2005/444/EC)
- EU-CON Classified Information: CONFIDENTIEL UE (Commission Decision 2005/444/EC)
- EU-SEC Classified Information: SECRET UE (Commission Decision 2005/444/EC)

17. Delivery date for Deliverable

Month in which the deliverables will be available, month 1 marking the start date of the project, and all delivery dates being relative to this start date.

18. Milestone number

Milestone number: MS1, MS2, ..., MSn

19. Review number

Review number: RV1, RV2, ..., RVn

20. Installation Number

Number progressively the installations of a same infrastructure. An installation is a part of an infrastructure that could be used independently from the rest.

21. Installation country

Code of the country where the installation is located or IO if the access provider (the beneficiary or linked third party) is an international organization, an ERIC or a similar legal entity.

22. Type of access

- VA if virtual access,
- TA-uc if trans-national access with access costs declared on the basis of unit cost,
- TA-ac if trans-national access with access costs declared as actual costs, and
- TA-cb if trans-national access with access costs declared as a combination of actual costs and costs on the basis of unit cost.

23. Access costs

Cost of the access provided under the project. For virtual access fill only the second column. For trans-national access fill one of the two columns or both according to the way access costs are declared. Trans-national access costs on the basis of unit cost will result from the unit cost by the quantity of access to be provided.

Part B

Contents

1. Definition of the problem, needs assessment and objectives of the project	2
2. Relevance and justification	3
3. Expected results	5
4. European added value	6
5. Methodology	6
6. Timeline by work package.....	9
7. The partnership and the core project team	12
8. Subcontracting	13
9. Monitoring of the project implementation; risks and measures to mitigate them	13
10. Evaluation of the project activities, deliverables and results	15
11. Dissemination strategy and communication tools	16
12. Sustainability and long-term impact of the project results	18
13. Ethical issues related to the project	20
14. Mainstreaming	20
15. Description of child protection policy	21
16. English translation of the abstract	21

1. Definition of the problem, needs assessment and objectives of the project

What are the problems and/or the current situation? Which are the needs that the project aims to address?

In relation to these problems and needs, what are the major objectives that the project should attain? Who are the target group(s) of your activities and why were they chosen?

Note:

You are expected to provide here a needs assessment for your proposed activities. Such needs assessment should include relevant and reliable data and should contain a robust analysis clearly demonstrating the need for the action. The applicant can refer to existing research, studies, previous projects which had already identified the need. The needs assessment must make it clear to what extent the action will meet the need and this shall be quantified. You are requested to be specific and focus on the actual needs that your project will aim to address and not limit the analysis to general statements and information about the problems and needs of the target group in general.

Combating racism, intolerance and hate crimes has not always been a priority in Greece. However, in the past few years there has been a strong will to recognize and combat these phenomena. For instance, according to official records, 184 incidents with a potential bias motivation have been recorded in 2017 by police authorities. The data recorded by Racist Violence Recording Network (RVRN), a network of NGOs established by the National Commission for Human Rights and UNHCR/Greece report 102 incidents. It is the first time that the incidents recorded by state authorities are more than the incidents recorded by civil society organizations. This fact demonstrates that the authorities are more alert on combating hate crimes and that the recording system put in place by the Police and the Ministry of Justice since 2013 has been producing results. Concerning the fight against racism, intolerance and hate crimes, a series of measures have been adopted in Greece in the past few years. The respective legislative framework has been strengthened. Additionally, institutional and operational measures have been adopted to increase reporting and recording of hate crimes. For instance, the legislation on hate crimes has been amended in order to facilitate its implementation. Moreover, the National Council against Racism and Intolerance (NCRI) has been established, which is a body consisting of representatives of the Ministries involved, of the National Commission for Human Rights, of UNHCR, of RVRN and other important stakeholders of the civil society. According to its mandate, one of its main tasks is the development of a comprehensive strategy against racism, intolerance and hate crimes. In order to produce a valid and comprehensive strategy and take into account all relevant recommendations and international standards, the drafting of the strategy is included in the present application's deliverables. Moreover, such a strategy will build on the results of the project "Building a Comprehensive Criminal Justice Response to Hate Crimes" which was conducted by the Hellenic Ministry of Justice, Transparency and Human Rights in cooperation with the Office of Democratic Institutions and Human Rights of OSCE in the context of «JUST/2015/RRAC/AG, Action grants to prevent and combat racism, xenophobia, homophobia and other forms of intolerance, RIGHTS, EQUALITY AND CITIZENSHIP/JUSTICE PROGRAMME (2014-2020)». In addition to the above, measures have been adopted to improve reporting and recording of hate crimes. For instance, legislative measures have been adopted to facilitate reporting by migrants. This has been considered of great importance, given the high numbers of migrants and asylum seekers arriving to Greece since 2015. However, more needs to be done to increase awareness and urge reporting of hate crimes. A need expressed by the communities themselves is to be informed of victims' rights. For this reason, a Guide for the Rights of Hate Crime Victims (translated in nine languages) is included in the present proposal. Recording of hate crimes has also improved on the one hand because of the role of civil society and especially RVRN, but also because of the efforts of the Hellenic Police and the Ministry of Justice to record all crimes with a possible bias motivation. The aforementioned project implemented with ODIHR has already produced results in this direction. For example, the Supreme Court Prosecutor has recently issued guidelines to all prosecutors in order to improve recording of hate crimes through a flagging system. Moreover, the need to express a "zero tolerance" state policy towards racism, intolerance and hate crimes and the need to increase awareness-raising within the Greek society has been identified. This will be achieved through an effective media campaign concerning these phenomena, which has never been conducted before. Therefore, this aspect is also included in the present application.

Last but not least, the need to increase awareness of the Members of the Parliament (MPs) against racism, intolerance and hate speech is considered paramount, given the role of the Parliament, but also of politicians in general. For example, recent legislative initiatives concerning the LGBT community, like the Law on Registered Partnership which was extended to same sex couples or the Law on Legal Gender Recognition for transgender persons, triggered hate and homophobic speech, both within and outside the Parliament. The role of politicians to combat hate speech, but also to promote legislative initiatives that fight racism and discrimination is considered extremely important. For these reasons and taken into consideration that an Agreement for a comprehensive response to hate crimes has been concluded in the context of the aforementioned project between the Administration, the Judiciary and Civil Society, the involvement of the Parliament will fill in the gap for a comprehensive strategy against racism, intolerance and hate crimes. MPs and politicians are expected to realize the consequences of hate speech and to integrate counter-speech narratives in public speech. Moreover, the need to take into consideration multicultural inclusion and diversity in decision making will also be emphasized. In addition, the need for capacity and trust building for the targeted communities and respective NGOs is also taken into account.

The objectives are:

- To form a comprehensive strategy against racism, intolerance and hate crime,
- To express a zero tolerance state policy towards racism, intolerance and hate crimes,
- To fill in the gaps and respond to the needs identified from previous experience, such as the implementation of the project "Building a Comprehensive Criminal Justice Response to Hate Crimes,"
- To improve reporting of hate crimes by disseminating hate crime victims' rights,
- To raise public awareness,
- To promote capacity building for prosecutors, public officers and MPs, as well as targeted communities,
- To induce trust building of targeted communities towards the judiciary and law-enforcement authorities,
- To effectively prosecute hate crimes,
- To combat hate speech.

2. Relevance and justification

How does your project address the call priority under which you are applying? What is the project's contribution in this area?

What are the innovative aspects of the project?

It is well known that the Rights, Equality and Citizenship Programme 2014-2020 aims at contributing to the further development of an area where equality and the rights of persons, as enshrined in the Treaty, the Charter and international human rights conventions, are promoted and protected. In particular, the present call aims at preventing and combating racism, xenophobia and other forms of intolerance, and improving public authorities' responses to hate crime and hate speech. The project's main purpose is to fight racism and intolerance, to effectively prosecute hate crimes and combat hate speech.

The project builds on the lessons learned and on the needs identified through our participation to the above mentioned project "Building a Comprehensive Criminal Justice Response to Hate Crimes". By designing a comprehensive strategy through a National Action Plan against Racism and Intolerance, Greece will achieve better implementation of respective national legislation, including the Framework Decision 2008/913/JHA. In particular, the National Action Plan will include institutional and operational measures, and will require the development of institutional actions that widen and strengthen individual rights and freedoms and empower the function of the democratic institutions in general. The measures adopted will primarily refer to the prevention of racism, xenophobia and intolerance actions, determining measures of suppression in cases of their violation, for instance if someone or a group of person publicly incite another person or a group of persons to violence or hatred due to race, color, religion or descent, this person or group of persons will be punished according to what the institutional intervention stipulates. By setting high standard in fighting racism, intolerance and hate crime, the Action Plan will be considered a good practice for other countries. This will be the first time that such a comprehensive strategy is drafted in Greece.

The National Council against Racism and Intolerance (NCRI) will elaborate the National Action Plan against Racism and Intolerance. The NCRI is an inter-ministerial body assigned with the development of policies on preventing and combating racism and intolerance, and comprised of representatives of the Administration (the various ministries) as well as non-state stakeholders, such as UNHCR, the National Commission for Human Rights, labour organizations, the Racist Violence Recording Network (comprised of 46 NGOs), etc. According to NCRI's mandate, one of its main tasks is the development of a comprehensive strategy against racism, intolerance and hate crimes. Hence, in order to produce a valid and comprehensive strategy and take into account all relevant recommendations and international standards, the contribution of the NCRI is crucial for the drafting of the National Action Plan. The draft Action Plan will be submitted to NCRI for comments and observations and it will be revised based on these comments. As already decided by the NCRI, the first National Action Plan against Racism and Intolerance will include actions of the Ministries involved and the NCRI itself. After the consultation phase, all actions planned by the various Ministries will be compiled. Non-state stakeholders will make suggestions to state authorities for actions. Therefore, the NCRI will serve as a forum of dialogue at the preparation phase of the Action Plan. It will be presented in a public event. This could be done in a press conference or in the respective Committee of the Parliament. It will introduce the existing state of play and national legislation, based on reliable data. It will also highlight the problems that should be addressed and set the goals that need to be achieved, by identifying the priorities and by taking into account international standards and best practices. It will present the necessary institutional interventions of all public authorities involved (not only of the Ministry of Justice), with specific targets and benchmarks. The Plan will also introduce some project activities which also constitute milestones for the present proposal (Guide, trainings, trust building meetings, one-day-Conference) implementing thus the new institutional standards proposed by it. It is clear from the above that the Action Plan will be drafted in a participative way. As already mentioned, the NCRI which is responsible for drafting the Action Plan consists of non-governmental bodies as well, such as UNHCR, the National Commission for Human Rights, labour organizations and most importantly the Racist Violence Recording Network, an "umbrella" organization of civil society where 46 NGOs participate. It should be stressed that almost every targeted group is represented in the Racist Violence Recording Network. Apart from the participative drafting phase of the Action Plan, the first draft will be also submitted to public consultation electronically for any comments and suggestions.

Moreover, an effective media campaign is considered necessary in order to raise public awareness and to convey a strong message of a "zero tolerance" state policy. Such a campaign has never been conducted before.

In addition, based on the findings of the project "Building a Comprehensive Criminal Justice Response to Hate Crimes", we aim to foster capacity building of all stakeholders involved and to develop tools for addressing under-reporting of hate crimes. In particular, another innovative aspect of the project constitutes the educational trust building meetings between prosecutors and communities at risk of hate crimes. For the first time public prosecutors will meet with representative NGOs in the premises of the communities in small groups with a direct, immediate, in person exchange in order to build trust towards the judiciary and law enforcement authorities. The above action will be presented in the National Action Plan, and included in the Webpage for the National Council against Racism and Intolerance. It will be thoroughly analysed in the Evaluation Report and also mentioned in the European Added Value Report. Moreover, the trainings for public prosecutors will enhance their ability to effectively prosecute hate crimes. Additionally, the capacity building activities for targeted communities (e.g. the Guide for the Rights of Victims of Hate Crimes) are tools to address under-reporting, which is a key objective of the present call. The project promotes also the capacity of public officers to participate in the creation of an effective comprehensive strategy against racism and intolerance.

The involvement of members of the Hellenic Parliament will guarantee the effectiveness of future legislation in this field and its compliance with international standards. It will also ensure increased awareness in public discourse against hate speech.

Furthermore, our proposal aims at enhancing Greece's role in the field of combating racism, xenophobia and other forms of intolerance in Europe, taking into consideration the challenges presented in Europe from migratory pressures. The report on the European added value of this variety of activities, involving all branches

of the state (the executive, the legislative, the judiciary) and civil society, will be a useful tool for all EU member states when designing a comprehensive strategy to combat racism, intolerance and hate crimes.

3. Expected results

What are the expected results of the project? Who will benefit from these results and how?

How will the target groups of the project benefit concretely from the project results and what shall change for them?

How will these results contribute to achieving the objectives of the call priority under which you are applying?

Note:

Results are immediate changes that arise for the target groups after the completion of the project (e.g. improved knowledge, increased awareness). Results must be distinguished from deliverables, which are produced with the resources allocated to the project, e.g. training courses, conferences, leaflets.

The project builds on lessons learned and needs identified from the above mentioned project “Building a Comprehensive Criminal Justice Response to Hate Crimes”, which focused on improving criminal justice response to hate crimes. The current project aims to complement the previous project and to form a comprehensive strategy against racism, intolerance and hate crimes.

The project’s expected results can be summarized as follows:

- To establish a comprehensive national strategy against racism, intolerance and hate crimes,
- To increase public awareness through a media campaign,
- To provide with better information and to raise awareness on victim’s rights, through the Guide for the Rights of Hate Crime Victims and other activities, which will reinforce victims’ access to justice and address under-reporting of hate crimes. The number of reported hate crimes is expected to increase.
- To improve capacity of all relevant stakeholders (targeted communities, public officers, judiciary, Members of the Parliament),
- To improve implementation of national and European respective legislation,
- To prevent and combat racism, intolerance and hate crimes more effectively,
- To protect and promote human rights and equal citizenship for all persons more effectively,
- To produce transferable best practices and results at European level.

In particular, the elaboration of a National Action Plan against Racism and Intolerance will contribute to the development of a comprehensive strategy against racism, intolerance and hate crime, by recording all respective institutional interventions based on reliable data and needs, while taking into consideration European best practices.

Moreover, the elaboration of a Guide for the Rights of Hate Crime Victims translated in nine (9) languages will provide better information and awareness raising for all targeted communities. It will lead to increased reporting of hate crime and it will improve victims’ access to justice.

The creation of a Media Plan followed by an awareness raising campaign will undoubtedly raise public awareness, leading to preventing and combating racism, intolerance and hate crimes and to reinforcing victims’ access to justice. The Webpage for the National Council against Racism and Intolerance will complement the latter activity, by constantly providing updated data and information. The training courses for public prosecutors will improve their knowledge and awareness on the subject, but also their ability to effectively prosecute hate crimes. Furthermore, the workshops, the one-day-Conference at the Parliament and the educational meetings of public prosecutors with the targeted communities will promote capacity and trust building, as well as awareness raising. In the Report on the European added value, lessons learned and transferable best practices that derive from the project will be recorded in order to ensure that the project will provide useful results for other EU member states as well. The Evaluation Report will include an overall evaluation of the project’s activities in order to measure its effectiveness, as well as proposals for further actions that will ensure sustainable results.

4. European added value

What is the project's added value at European level?

How will you ensure that the project methodology and/or deliverables and/or results will be transferable at European level?

Note: *European added value of actions, including that of small-scale and national actions, shall be assessed in the light of criteria such as their contribution to the consistent and coherent implementation of Union law, and to wide public awareness about the rights deriving from it, their potential to develop mutual trust among Member States and to improve cross-border cooperation, their transnational impact, their contribution to the elaboration and dissemination of best practices or their potential to contribute to the creation of minimum standards, practical tools and solutions that address cross-border or Union-wide challenges.*

The “Report on the European Added Value” of the project, which will be translated in English, will describe the European added value of the project, i.e. the lessons learned and transferable best practices that derive from the project. The project has a considerable European added value since it focuses on the establishment of a comprehensive strategy against racism, intolerance and hate crimes and on actions that will form such a strategy. We consider that the lessons learned from such an effort are valuable for many EU member states that are also facing similar challenges and are intending to form such a comprehensive strategy. European best practices that will be considered for the implementation of the project will also be highlighted, as well as challenges, difficulties and problems that might possibly arise when forming such a comprehensive strategy. On the other hand, the Evaluation Report will provide an overall evaluation of the project, focusing mainly on its effectiveness, with a record of the results produced, the policies that were developed, the positive impacts and the sustainability of results. Therefore, both reports will describe the lessons learned from the project and will highlight best practices. The results of the Report on the European Added Value can be disseminated in other EU Members states in order to ensure the trans-national impact of the project, taking into consideration that positive changes in one country can motivate reform in other EU member States.

Moreover, cross-border dialogue will take place at the international Conference which will be organized by the Hellenic Parliament with the participation of members of the Hellenic Parliament, members of the European Parliament, of the CoE Parliamentary Assembly and international experts, being thus a forum for European dialogue.

5. Methodology

Outline the approach and methodology. Explain why this is the best approach to attain the objectives and the proposed results.

Explain the structure and complementarity of the work packages.

The project’s objectives are to form a comprehensive strategy against racism, intolerance and hate speech, including capacity and trust building between stakeholders, awareness raising not only of direct interested parties but also of the large public and to go forward with institutional interventions with long term impacts. Thus, a holistic approach concerning the activities that have been included seemed the most appropriate way to proceed, and best served our wish to establish Greece as a legitimate Partner in the anti-racist European perspective. Consequently, the project focuses on more than one target group or one kind of activities.

More specifically, the project will be run by the Ministry of Justice, Transparency and Human Rights and implemented by a Project Management Team consisting of qualified staff. There are two Partners: the Hellenic Parliament and the Centre for Political Research of the Panteion University of Social and Political Sciences. In addition, the project includes subcontracts to be procured and awarded according to European and national laws. The methodology described below is considered as the best approach to attain the objectives and the proposed results and is approved by all stakeholders (see paper agreement in the Annexes). All three partners are equally qualified for the actions they will undertake and will have the guidance of the Core Project Management Team, in order to ensure that all expected results will be delivered.

This project presents an integrated intervention system in the field of hate speech and hate crime, with five (5) work packages which complement each other. The first one “Management and coordination of the project” determines the way the project’s activities are organized in order to best achieve its objectives. Therefore, there will take place twelve (12) bimonthly meetings with the Partners and twelve (12) printed reports in Greek, which will present and monitor emerging issues, performed activities and budget overview. They will also record the progress of the project, evaluate the outcomes and describe the stakeholders engaging. The meetings' reports will be electronically available. Six (6) copies of them will be distributed after each meeting (two for every partner).

Work Package number 2, entitled “National Action Plan against Racism and Intolerance”, includes the elaboration of a National Plan in the above-mentioned field. The Action Plan will be drafted by an expert, who will also undertake its translation into English. It will be printed in 500 copies to be disseminated and also uploaded on the websites of the National Council against Racism and Intolerance and the Ministry of Justice, making it easily accessible to all. It will also include a presentation of the actions adopted in the present project (trainings, trust building meetings, awareness raising campaign, NCRI’s Webpage, Guide).

Work package 3, entitled “Awareness raising – Publicity”, proposes three deliverables. Firstly, a media plan defining ways to convey the message of combating racism and intolerance. The Media Plan will predetermine all media actions and means to achieve them. It will be elaborated by an expert. An awareness campaign will follow the Media Plan’s instructions on how to diffuse the communication messages to the target groups. The campaign will be subcontracted to third parties. In addition, a Web page for the National Council against Racism and Xenophobia will be developed by an expert, in order to provide information to stakeholders as well as promote the awareness raising campaign. The Web page will feature a visits counter as well as a link to the Web page of the Ministry of Justice, Transparency and Human Rights.

Work package 4, entitled “Capacity and Trust Building”, includes various capacity and trust building actions:

- A Guide for the Rights of Victims of Hate Crimes, drafted by an expert in Greek. The Guide will be translated into nine (9) languages. In particular, the Translation Department of the Ministry of Foreign Affairs will translate the Guide into English, French, Arabic, Albanian, Russian and Georgian, and freelance translators in Farsi, Urdu and Pashto.
- Capacity building workshops to communities and respective NGOs concerning the rights of victims. Three workshops will be organized by the Centre of Political Research of the Panteion University, with the cooperation of the National Council against Racism and Intolerance: Two (2) workshops on the rights of victims of hate crimes, based on the Guide for the Rights of Hate Crime Victims, and one (1) workshop concerning the elaboration of the National Action Plan against Racism and Intolerance (capacity building for the Administration), all to be held in the premises of the Panteion University. In particular, the latter workshop will aim at introducing the members of the National Council against Racism and Intolerance (NCRI) and other civil servants that are not members of the NCRI to methodologies on elaborating Action Plans on Human Rights (and in particular against Racism and Intolerance), on the process of elaborating the first National Action Plan against Racism and Intolerance, on experiences and best practices from other European States, as well as methods to evaluate the results of the Action Plan. The workshop will aim at increasing the capacity of the persons who were engaged in the drafting of the current Action Plan, who will be responsible for its evaluation and will also draft the next one.
- Educational and trust building meetings of communities and respective NGOs with public prosecutors. Six (6) educational and trust building meetings will be held in order for prosecutors to inform the communities about the rights of victims of hate crimes and the procedures for reporting a crime. The prosecutors will meet with the communities in their own premises, in small groups with a direct, immediate, in-person exchange, in order to build trust towards the judiciary and law enforcement authorities. Our goal is to establish good communication channels between Special Prosecutors on Hate Crimes and targeted communities. E.g. the Special Prosecutor on Hate Crimes of Thessalonica could meet with the Jewish Community which has a strong presence in the city.
- Two training courses for prosecutors concerning hate crimes will be organized, so that prosecutors are able to effectively investigate and prosecute hate crime and hate speech cases (capacity building actions for the prosecutors). At this point, we must stress out that in the framework of the project “Building a Comprehensive Criminal Justice Response to Hate Crimes” which was conducted by the Hellenic Ministry of

Justice, Transparency and Human Rights in cooperation with the Office of Democratic Institutions and Human Rights of OSCE in the context of «JUST/2015/RRAC/AG, Action grants to prevent and combat racism, xenophobia, homophobia and other forms of intolerance, RIGHTS, EQUALITY AND CITIZENSHIP/JUSTICE PROGRAMME (2014-2020)», a training seminar of 24 prosecutors has been conducted by ODIHR in cooperation with the Supreme Court Prosecutor (who is the hierarchical superior prosecutor). This training was a “Training for trainers” course, which has already produced results. For instance, one of the high-rank Prosecutors who attended the seminar conducted trainings of prosecutors from several Prosecutors’ Offices, as well as a seminar at the National School of Judges. Moreover, ODIHR’s material that was used for the training (PAHCT) has been translated and customized for Greece. This training material is ready for use. In addition to the above, the commitment of the Supreme Court Prosecutor has been a driving force for the training, as well as for the other initiatives undertaken by the judiciary in the context of the aforementioned project. As ODIHR’s expert underlined, the Supreme Court Prosecutor attended the three days training herself and requested detailed reports from all the prosecutors who attended the training. In this way, she demonstrated her commitment to combat hate crimes, giving the example to the other prosecutors as well. Her commitment to the fight against hate crimes is also evidenced by the fact that: She signed the “Agreement on inter-agency cooperation on addressing hate crimes in Greece” which was concluded between the various Ministries, the Supreme Court Prosecutor, the Supreme Court President, Civil Society and other stakeholders. She also participates in the “Agreement for Improving the Co-operation for Recording and Retaining Data on Hate Crimes” which will also be signed soon between law enforcement actors. She issued two guidelines on addressing hate crimes and on recording and retaining data on such crimes. The Supreme Court Prosecutor has expressed the will to conduct more training seminars on hate crimes. However, lack of resources to cover travel and accommodation costs is an impediment, especially for prosecutors who are serving in distant Prosecutors’ Offices, such as the Aegean islands. For this reason, our proposal includes training seminars. We already have the will, the training material and the expertise for such a training and funding will facilitate its realization.

Concerning the choice of public Prosecutors who will participate in the training, training courses will be organised in cooperation with the Supreme Court Prosecutor who is the superior in rank prosecutor, who will primarily nominate the 40 prosecutors. The Ministry of Justice will request from the Supreme Court Prosecutor to make the selection based on the following criteria: a) To give priority to the Special Prosecutors on Hate Crime, b) To the geographical spread of the prosecutors who will participate, with special emphasis on the Aegean Islands, and c) To attain a Gender balance. The procedure of selection or nomination by the judiciary is followed in every activity involving the participation of a judge or prosecutor.

- An international conference concerning the role of Members of the Parliaments in combating racism, intolerance, as well as hate speech will be organized by the Hellenic Parliament. Members of the Hellenic Parliament, Members of the European Parliament, Members of the CoE Parliamentary Assembly and international experts (e.g. Members of the European Commission against Racism and Intolerance - ECRI) will participate. The participants will exchange views and European best practices on the role of Parliaments in combating racism, intolerance and hate speech. The one-day-conference will have live television coverage. Models and mechanisms which can be applied not only regionally or nationally but also EU widely, will be presented. The aim of the conference is to raise awareness and capacity of MPs, in order to combat racism, intolerance and hate speech.

Concerning the choice of MPs who will participate in the project, they will be selected from the relevant parliamentary committees. They will also be MPs representing the main parliamentary groups, and speakers from the Hellenic Parliament’s Scientific Service. The speakers will be selected via communication between the President’s office of the Hellenic Parliament (HeP), parliamentary groups and the Scientific Council of HeP. Apart from HeP, we will examine the involvement of representatives from relevant stakeholders (representatives from EU agencies, ministries, universities, etc.). At this point, we should also underline the fact that the choice of MPs is always in agreement with them so a possible denial of participation will be due to some extraordinary obligation.

In particular, concerning the MPs speakers: The MPs will be selected via communication between the President’s office the Parliament, parliamentary groups and the Scientific Council. They will be notified in very early stages of the project, so they will be given enough time to decline and approach alternative speakers.

MPs will be selected from the relevant parliamentary committees: Standing Committee on Social Affairs, Special Permanent Committee on Equality, Youth and Human Rights and Special Permanent Committee on monitoring the decisions of the European Court of Human Rights. They will also represent all parliamentary groups. There will be 15 – 20 speakers. Concerning the MPs the attendees: Invitations will be extended to all MPs, MEPs, members of the CoE Parliamentary Assembly, members of the Scientific Council of the Parliament, HeP's Foundation and other academics. Then, a press release will be issued and finally personal calls to all concerned will be made to verify their attendance.

Work package 5, entitled "Program Evaluation," contains two reports: an Evaluation Report assessing the project, recording the results produced and providing proposals for future actions based on actions implemented, and a Report on European Added Value, proposing lessons learned and best practices derived by the project, including proposals and actions that need to be undertaken for the results' sustainability. Both of them will be electronically available. The Evaluation Report will be printed in 10 copies and the Report on European Added Value in 30 copies to be disseminated. The two reports will be elaborated by the Centre for Political Research of the Panteion University of Social and Political Sciences, which will monitor and gather all documents (questionnaires, rapports, reviews, etc.) and electronic files, as to process them and proceed to the afore-mentioned deliverables.

As known, Work Packages interconnect and complement each other, presenting a coherent structure broken down to five (5) interdependent Work Packages, which aim at presenting a comprehensive strategy against racism, intolerance and hate speech and effectively preventing hate crimes.

6. Timeline by work package

Provide in a structured manner the timing of the activities per Work package by using, for instance, a Gantt chart.

Activities	Project months																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
WP1																								
Project review meeting 1	■	■																						
Project review meeting 2			■	■																				
Project review meeting 3					■	■																		
Project review meeting 4							■	■																
Project review meeting 5									■	■														
Project review meeting 6										■	■													
Project review meeting 7												■	■											
Project review meeting 8														■	■									
Project review meeting 9																■	■							
Project review meeting 10																		■	■					
Project review meeting 11																				■	■			
Project review meeting 12																						■	■	
Progress Report													■											
WP2																								
National Action Plan against Racism and Intolerance	■	■	■	■	■	■																		
WP3																								
Media Plan	■	■	■																					

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24		
Awareness raising campaign																										
Website for the NCRI																										
WP4																										
Guide for the Rights of Hate Crime Victims																										
Workshop 1							1 DAY																			
Workshop 2							1 DAY																			
Workshop 3							1 DAY																			
Training Course 1	1 DAY																									
Training Course 2	1 DAY																									
Educational meeting (EM) 1							1 DAY																			
EM 2							1 DAY																			
EM 3							1 DAY																			
EM 4							1 DAY																			
EM 5							1 DAY																			
EM 6							1 DAY																			
One-day-conference							1 DAY																			
WP5																										
Evaluation report																										
Report for the European Added Value																										

7. The partnership and the core project team

Describe the partnership of organisations implementing the project (applicant, partners). Explain how the partners were selected, and why is this partnership the best to attain the objectives of the project. Describe the value of the partnership, its strengths/weaknesses, the organisational arrangements within the partnership and how you will ensure coordination within the partnership.

Introduce the persons of the core project team and list the CVs (to be attached to the application) of the key people working in the project (project manager, financial manager and the key experts).

The three co-beneficiaries Partners for the project are the Ministry of Justice, Transparency and Human Rights, the Hellenic Parliament, and the Centre for Political Research of Panteion University of Social and Political Sciences.

The Parliament is the supreme democratic Institution that represents the citizens through an elected body of Members of Parliament (MPs). The legislative work, namely voting of Bills and Law Proposals and the exercise of parliamentary control over the Government, are the core Parliament activities.

The Ministry of Justice, Transparency and Human Rights was initially established as the State Justice Secretariat in April 1833. The General Secretariat for Human Rights of the Hellenic Ministry of Justice is responsible for undertaking initiatives for the promotion, protection and fulfilment of human rights, as well as for the compliance to international human rights obligations. To this end, the General Secretariat for Human Rights, is responsible among others to elaborate policy priorities and lines of actions for the promotion and protection of human rights, undertake the respective legislative and administrative initiatives, monitor the compliance to international human rights obligations and undertake actions to promote and protect human rights, through, inter alia, National Action Plans.

The Centre for Political Research was founded in 1989 with resolution of the Senate of Panteion University (19-4-1989). Since August 2015 the Centre for Political Research has been established as a 'Laboratory' of Political Sociology and Comparative Political Analysis. The Centre aims at contributing to the continuous improvement of teaching and researching activities of the Department of Political Science and History, in collaboration with its personnel, its undergraduate and graduate students, as well as with other operating research centres, at cooperating with other educational, research and scientific institutions in general and other public and private institutions in Greece and abroad, on subjects of common interest related to political - sociological research and dissemination of election results, at undertaking any other appropriate initiative to achieve the objectives, subjected always to the rules of the academic and research ethics.

The Ministry of Justice is charged with the development of legislative initiative in basic justice sectors, in which is included the harmonization of internal law with the rules of international law. It is entrusted with the management of judicial function, which is one of the three State functions. The Hellenic Parliament is the supreme democratic institution that represents the citizens through an elected body of Members of Parliament. The legislative is the second one of the three State functions and most important for the harmonization of Greek with European legislation. On the other hand, the Centre for Political Research of Panteion University aims at the designing and conducting of political and sociological research, thus supporting the empowerment of institutional intervention. Therefore, the three partners will act supplementary in attaining the proposal's objectives. As for the partnership weaknesses, there is always a risk of disagreements and friction among partners.

The coordination within the Partnership will be ensured by the core project team, constituted by:
 The Project Manager designs and leads the program of activities. He ensures the quality of implementation/project products, provides reporting, supervises project staff, advises on policy matters, liaises with partners to combine resources and prevents overlaps.
 The Senior Project Assistant monitors administrative roll-out including subcontracting and ensures compliance with grant agreement.

The Budget Assistant maintains financial overview to enable efficient implementation of the project, reviews expenditure for re-allocation of funds as needed, reconciles expenses and prepares financial reports for review by project staff.

The Project Assistant provides project management/logistical support for the predetermined activities. All the CVs of the core project team are attached to the Annexes.

The three partners will recruit all staff at project start. Additional expertise will be provided at no cost by the Ministry of Justice.

8. Subcontracting

If applicable, explain the reasons for any subcontracting in your project.

The present project includes subcontracting in Work Packages 3, where subcontracting is applied for the drafting of the Media Plan and the running of the awareness campaign.

It is easy to comprehend that subcontracting exists on the grounds of providing expertise and qualified staff in order to undertake all the activities described in the project. Public awareness through the elaboration of a well-planned and structured Media Plan as well as its implementation and public dissemination through an awareness raising campaign cannot be performed by the entities involved in the project due to the lack of qualifications and know-how of the core project team, and the insufficiency of the necessary equipment. Without subcontracting, some project purposes such as expressing a zero tolerance state policy towards racism, intolerance and hate crimes, raising public awareness, effectively prosecuting hate crimes, and combatting hate speech, will not be achieved.

Therefore, subcontracting is a rational and cost-effective solution to achieve the project's objectives within time limits. Subcontracting will be assigned to specialized Legal Entities and persons qualified for the particular tasks. Moreover, subcontracts will be procured and awarded according to European and national law.

9. Monitoring of the project implementation; risks and measures to mitigate them

How will you ensure that the project is implemented as planned and what methods will you use to monitor its progress?

What are the potential risks and what action do you plan to undertake to mitigate them?

The implementation phase is the phase where the deliverables are realized, and requires for the project plan to be thoroughly checked. As we strongly believe that the present project is one with a clear scope, activities, implementation process and well-defined objectives, the implementation is expected to be precise and well performed. Careful monitoring and control processes will be ensured through the edition of twelve (12) bimonthly implementation reports so as to assure that the final deliverables meet the initial action plan. Routine performance and quality control measurements will be evaluated on a regular basis through gathering reports, thus achieving adequate monitoring throughout the implementation. Moreover, the fact that there is subcontracting to the project provides objective oversight and contributes to project's better implementation. The Project Management Team constituted by well-trained staff will ensure the stakeholders' cooperation and arrange all meetings with the Partners. It will also gather information, assign tasks to specific people and have a good overview of the resources. It will also collect, register and certify physical cost implementation, and keep a file of supporting documents. In addition to the above, the NCRI will not only serve as a forum of dialogue at the preparation phase of the Action Plan, but it will also monitor its implementation.

In every project exist potential risks. The more significant ones are the following:

- Delays at providing all required data in time and not adequate project reporting in order to identify project progress properly. To mitigate that risk we will provide clear guidance on deadlines regarding for instance the project progress reports, we will inform the partners in time and in detail about the reporting process and we will monitor the reporting of the project partners.
- Conflict between partners and disagreement over project issues at the executive level. To deal with that risk we will keep regular communication and bimonthly meetings with the partners in order to define the best common line/strategy and address all the differences.
- Delays of the stakeholders involved to provide input or data. To cope with that risk we will define a clear methodology, provide clear and precise information to the stakeholders, keep a constant communication and set specific deadlines.
- Difficulties in identifying the participants and engaging them through the deliverables (for instance not to identify the key public officers for the workshop on the elaboration of the Action Plan). To deal with that risk we will define the participants in early stages of the project and schedule the plan for the workshops, conference, meetings and courses in early stage in order to ensure broad participation. In particular, we will inform early targeted communities and NGOs for the workshops on victims' rights. We will also engage the members of NCRI for the workshop on the elaboration of the Action Plan, since the NCRI will be involved in the future Action Plans as well. Concerning the workshops on victims' rights, we have already contacted the Racist Violence Recording Network (an umbrella organization of 46 NGOs) to explore the interest of NGOs in such workshops and indeed some NGOs expressed their interest in advance. Therefore, we consider that there is a strong interest in such meetings where participants will gain knowledge on their rights. Concerning the workshop on the Action Plan, the members of the NCRI will participate in the workshop as part of their duties. Moreover, members from other sectors of the administration will participate in order to gain useful knowledge on how to develop a National Action Plan, which is a common tool for the elaboration of national policies.
- Difficulty in identifying motivated participants for the International One-day-conference. To face that risk, we will define and approach the participants in early stages of the project in order to raise awareness and engage them to the benefits of their participation. MPs from the European Parliament and the Parliamentary Assembly of the CoE will also be engaged. This will motivate participation from various political groups and parties. We believe that apart from MPs from far-right political parties, MPs from all other political parties will be interested to participate to the conference to show their commitment in the values of a democratic society.
- Regarding the recruiting and retaining of 40 public prosecutors for the training courses: Risk of them declining to take part and reacting to the filling in of the questionnaires. The Supreme Court Prosecutor has expressed the will to conduct more training seminars on hate crimes. The commitment of the Supreme Court Prosecutor gives the example to the other prosecutors and insures as well the prosecutor's participation to the trainings. Moreover, the training course will be organized in cooperation with the Supreme Court Prosecutor who is the superior in rank prosecutor. Training seminars organized by the Supreme Court Prosecutor are always very popular to prosecutors from all over Greece, especially if travel expenses are covered. Concerning seminars, we already have the will, the training material and the expertise for such a training, and funding will facilitate its realization. Concerning the questionnaires, there will be a briefing on their purposes stressing out the fact that they are not made to control the prosecutors but to facilitate the project's progress.
- Risk if the Media plan does not take into account the specific purpose of the awareness raising campaign. To avoid that risk we will provide clear guidance and instruction to subcontractor who assumes the drafting of the Media Plan. Moreover, other awareness raising campaigns against racism and discrimination of States or international NGOs may be taken into consideration, so that the subcontractor has a clear understanding of the aim and spirit of the campaign.
- Delays in gathering the material that will be uploaded in NCRI's Webpage. To avoid that risk we will clearly collaborate with all involved Partners in order to respect all deadlines (for instance for the drafting of the National Action Plan against Racism and Intolerance), by keeping a project's agenda and regularly communicating with the stakeholders involved.
- Delays in collecting and processing all collected data (files, questionnaires, documents, etc.). To overcome that risks, we will collect all data as soon as they are completed, draft and keep a scheduled plan related to data process.

- Concerning the educational/trust building meetings of prosecutors with CSOs, risk that public prosecutors who will attend the educational meetings with the communities decline to take part, or, if they take part, will not have good communication skills. As the Supreme Court Prosecutor has already expressed her agreement to conduct such meetings, the implementation of this action won't be jeopardized. Moreover a person from the Ministry of Justice will work as a facilitator during the meetings and will urge the participants to ask questions to the Prosecutor.
- Concerning the Awareness Raising Campaign, there is the risk not to identify the right tools and channels to use, not to develop the campaign message which best serves the goals of the proposal and the project and not to be sustainable and successful. Moreover the Campaign may be considered a stand-alone initiative. To mitigate all these risks we will choose the appropriate and experienced campaign developer and give him clear guidance and instructions. We will prepare all the details in the Media Plan and use other means as well to convey the message (National Action Plan, Guide for the Rights of Hate Crime Victims, etc.). We will monitor the whole making of the campaign process and will ensure that all stakeholders involved have the same understanding of what they are working towards.

In addition to the above, the Core Project Team will comply with the submitted action plan by means of real time monitoring and analysis of the project implementation's progress. We will ensure the commitment of every member of Project management Team and direct stakeholders through often and direct communication, and will prioritize teamwork.

10. Evaluation of the project activities, deliverables and results

How will the project activities, the deliverables and the results be evaluated, and by whom?

Explain which quantitative and qualitative indicators you propose to use for the evaluation of the reach and coverage of project activities and project results.

Explain what data will be collected, according to what method and at what moments, including feedback from project participants (satisfaction surveys, evaluation forms, etc).

How will findings be analysed and reported and how will they be used.

Note: For the evaluation of the activities you will be requested to use the participation evaluation questionnaire to be provided by the Commission.

You must identify which indicators you will use from the list provided in the Indicators excel sheet and include them in the indicators of your project. You will be asked to report on those indicators as part of the project's Final Report.

Where relevant, data must be disaggregated by gender and by age.

The project activities, the outputs and results will be evaluated by the Centre for Political Research of Panteion University of Social and Political Sciences. The Centre will elaborate an Evaluation Report concerning the project's progress and implementation. How the project activities have effectively resulted in combating racism, intolerance and hate crimes will be assessed, using these results – level indicators:

- 93 questionnaires for the 3 workshops, the two of them related to the Guide for the Rights of Hate Crime Victims and the third for the National Action Plan against Racism and Intolerance,
- 1 report for the one-day-Conference about Parliament Members' role in combating racism,
- 12 project progress review meetings of the Project Management Team,
- 12 bimonthly reports,
- 180 questionnaires for the 6 educational meetings between public prosecutors and communities and respective NGOs,
- 42 questionnaires for the 2 training courses for public prosecutors,
- 4 budget/expenditure reports,
- Web page visits counter.

Each project event will be evaluated on site by participants, trainers and host institution using special questionnaires. Evaluation will also refer to project process, implementation and involvement of stakeholders, the identification of strengths and weaknesses. It will be based on project documentation (agendas, training materials, participants' lists, project progress review meeting minutes, questionnaires/feedback, conference report, budget/expenditure reports, etc.). It will look at project process, implementation and involvement of stakeholders, how it worked operationally, how networks were built and sustained, identifying strengths/weaknesses.

For accurate control and maximum efficiency of communication planning, there will be applied according to each category of actions, two different assessment methods: 1) Quantitative Evaluation. Measurement indexes of objective elements are monitored, such as the number of events, participants, etc. In particular, depending on the communication channels proposed by the Media Plan, the Awareness Raising Campaign will be evaluated by the frequency of coverage in Radio & TV, the number of press and media appearances, the number of Press Releases published, the number of guests and number of participants in events (comparison between invited and participants), and the number of visits and users on the internet of the sites related to the Campaign. We will count the number of hate crime cases reported in the police or other organizations before and after the campaign by civilians that witnessed these cases (we could also add a frame analysis of public discourse, especially via the media but this a project by itself), in order to foster awareness raising. We will distribute questionnaires to a number of stakeholders evaluating their capacity before and after the campaign, in order to increase capacity of all stakeholders (targeted communities, public authorities, the judiciary and members of the parliament), and we will assess the rate of cases that reach the judiciary system and compare the number of cases before and after the campaign, in order to reinforce access to justice for victims of hate crimes.

2) Qualitative Evaluation. Subjective elements of monitoring and evaluation of the action are more taken into consideration, for instance the integrity of the technical characteristics, the quality and completeness of the information provided. For instance, we will compare policy strategies against racism, intolerance and hate crimes in different periods of the Greek legislative tradition (divide the period in the past three decades - 1990s, 2000s, 2010s), in order to develop a comprehensive strategy against racism, intolerance and hate crimes. Furthermore, in order to evaluate the success of the proposal's communication strategy, we will use modern instruments and tools, which will record qualitatively and quantitatively characteristics of publicity activities.

11. Dissemination strategy and communication tools

How do you plan to disseminate (actively spread) information about the project, its activities and its results? Please specify in particular:

- **Communication needs and objectives:** What are the communication needs and objectives of the project?
- **Target groups and multipliers:** What are the target groups? Which stakeholders or other organisations could possibly be supporters and multipliers of the communication activities?
- **Key messages:** Which messages will the activities convey in order to meet the communication objectives?
- **Distribution channels/tools:** Which communication channels/tools will be used to convey the messages to your target groups and multipliers?
- How will your dissemination strategy facilitate further use and transferability of the project results?

The project's dissemination strategy is presented in Work Package 3 entitled "Awareness Raising – Publicity". First deliverable will be the elaboration of a Media Plan which will describe the objectives, the strategy and the media schedule, and will determine the best way to convey a message to the target audience.

Second deliverable will be the awareness raising campaign against racism and intolerance which is expected to combat social stereotypes and to change obsolete perceptions. The target of the campaign is to raise awareness of the general population against racism, intolerance and hate crimes and to provide information about present situation. Through the campaign, the state aims at expressing a zero tolerance policy against

these phenomena, thus the campaign will be one of the elements complementing a comprehensive national strategy. Having identified target groups and channels to use, the Campaign will develop and promote the selected messages in accordance with what is defined in the Media Plan. It is clear that the content of the Campaign's messages refer to combating hate speech, protecting human rights, preventing racism, xenophobia and other forms of intolerance. The Campaign addresses to the general population and potential hate crime victims. The information channels of the Campaign will be defined in the Media Plan. In particular, the campaign will be conducted based on the aforementioned Media Plan, which will present and propose the channels used to transmit the predetermined messages. It is possible that TV and radio spots will be broadcasted, given that Greek television channels promote messages of social interest for free. The distribution of leaflets in the premises of civil society organizations, at migrants' Reception Centers (the so called "hot-spots"), schools, and other selected distribution points constitute a possible way of conveying the Campaign's messages, given that the National Printing Office is assigned with the design, printing, management, distribution of publications serving a public purpose with a small price. In any case, we will be in constant communication with the Campaign developers exchanging our point of views in order to achieve the communication objectives.

At this point, we should stress out that subcontracting will be applied for the drafting of the Media Plan and the running of the awareness campaign. According to the Article 10 of the Grant Agreement, a contract providing for experts to evaluate an action without specifying the documents they should read, the events they should attend, the persons they should interview, etc, should be considered as subcontract. That is the reason why, at this point, we cannot clarify the information channels of the awareness campaign.

Third deliverable will be the Web Page for the National Council against Racism and Intolerance, which apart from providing information to the public, will also present the deliverables of the project (the National Action Plan, the Guide for the Victims of hate crimes, etc.) and will promote the awareness raising campaign. Moreover, it will be linked to the Webpage of the Ministry of Justice, Transparency and Human Rights. The website will be constantly updated, thus ensuring that the information provided is up-to-date, and the number of visits will be recorded as an indicator for the website's effectiveness. The Website will ensure that the results and collection of best practices are disseminated and made available outside Greece. Greece could be thus given an example and encourage other countries to follow. In general, as project activities include public information and awareness raising per se, the project's communication objectives are to diffuse information and achieve publicity of all project's activities as much as possible.

In addition, the international conference organized by the Hellenic Parliament will have live television coverage, communicating not only to members of Hellenic Parliament and other European institutions, but also to the general public, real data conclusions and proposals concerning racism and intolerance. The Guide on the Rights of Hate crimes victims will be distributed in civil society organizations, the Hellenic Police, prosecutor offices, public hospitals and migrants' Reception Centres. Furthermore, the two workshops organized by the Centre for Political Research of Panteion University concerning the rights of victims of hate crimes, as well as the six educational meetings of public prosecutors with targeted communities will also disseminate the Guide. The National Action Plan against Racism and Intolerance will be printed in 500 copies to be disseminated and will be uploaded on the websites of the National Council against Racism and Intolerance and the Ministry of Justice to be publicly available. Moreover, the workshop organized by the Centre for Political Research concerning the elaboration of the Action Plan will also present it to the participants.

Furthermore, the Ministry of Justice will promote the project's activities in every suitable occasion (e.g. public speeches of the political leadership of the Ministry of Justice, reference to the project in national reports to international organizations, in parliamentary scrutiny, etc.). This is expected by other high ranking officers involved in the project as well (e.g. the President of the Parliament). In general, since the project's activities form a part of Greece's national policy against racism, intolerance and hate crimes, they will be widely disseminated by state agents in Greece and abroad.

Attention will be also paid to internal communication. There will be twelve meetings with the partners and the Project Team, ensuring that all involved stakeholders communicate on a regular basis.

Depending on each activity, the target groups of the dissemination strategy include:

- The public,
- Targeted communities,
- Civil society organizations,
- The judiciary,
- Public officers, and
- Members of the Parliament.

Lastly, all target groups are expected to be supporters and multipliers of the visibility of the project's activities.

12. Sustainability and long-term impact of the project results

What is planned as follow-up of the project after the financial support of the European Union has ended? How will the sustainability of the project's results be assured? Are the project results likely to have a long-term impact? How?

Note: *In this part you should not list activities or deliverables of your project, but you should focus on the expected long-term impact of your project. The long-term impact refers to long-term socio-economic consequences that can be observed after a certain period following the completion of the project and may affect either the target groups of the project or other groups falling outside the boundary of the project, who may be winners or losers.*

First of all, the present project builds on the results of the above mentioned project "Building a Comprehensive Criminal Justice Response to Hate Crimes". This demonstrates the commitment of the Ministry of Justice to follow up on previous projects and to build on their results in a constructive and effective way.

The project includes institutional interventions with long term impacts:

Firstly, the National Council against Racism and Intolerance (NCRI) will undertake the elaboration of National Action Plan against Racism and Intolerance. By the L. 4356/2015, NCRI was established. The NCRI is an inter-ministerial body assigned with the development of policies on preventing and combating racism and intolerance, and comprised of representatives of the Administration (the various ministries) as well as non-state stakeholders, such as UNHCR, the National Commission for Human Rights, labor organizations, the Racist Violence Recording Network (comprised of 46 NGOs), etc. According to NCRI's mandate, one of its main tasks is the development of a comprehensive strategy against racism, intolerance and hate crimes. Therefore, the sustainability of the Action Plan is ensured, since the body that will be responsible for its development is established by law. NCRI will also monitor the implementation of the Action Plan. This will ensure the sustainability and long-term results of the Activity. In addition to the above, the National Action Plan against Racism and Intolerance will reveal all the needs and inadequacies of public administration on this field. All countries face challenges and the first step in order to face them is to identify them. An institutional approach against racism and intolerance is realistic with this Action Plan. It acknowledges that improving human rights is a public policy objective that can be implemented through the usual planning of the government. This Action Plan automatically integrates the above mentioned objective into the general objectives of the State and will be the model for future Action Plans. The participation of state institutions and stakeholders in the plan (as already decided by the NCRI, the Action Plan will include actions of the Ministries involved and the NCRI itself) imposes commitments to the highest-ranking institutional leadership, building a strong foundation for a coordinated effort against racism and intolerance in the country. Furthermore, the action plan will facilitate the implementation monitoring of the commitments undertaken and will apply pressure to all stakeholders involved to fulfil them so as vulnerable groups can be substantially benefited.

Moreover, the Action Plan will be the first Action Plan against Racism ever developed in Greece. However, it will not be the only one, since the development of Action Plans against Racism and Intolerance is one of the core institutional responsibilities of the NCRI. Therefore, the impact of the first Action Plan will be important because it will serve as the example for the Action Plans that will follow in the future.

In addition to the above, National Action Plans against Racism and Intolerance are not very common in Europe. Therefore, we consider that the Greek Action Plan against Racism and Intolerance may serve as a good practice for other EU member states. For example, we know that Belgium is also in the course of starting its own Action Plan against Racism and hate crimes.

Secondly, the workshop concerning the presentation of the National Action Plan will aim at introducing the members of NCRI and other civil servants that are not members of the NCRI to methodologies on elaborating Action Plans on Human Rights (and in particular against Racism and Intolerance), on the process of editing the first National Action Plan against Racism and Intolerance, on experiences and best practices from other European States, as well as methods to evaluate the results of the Action Plan. The workshop will aim at increasing the capacity of the persons who were engaged in the drafting of the current Action Plan, who will be responsible for its evaluation and will also draft the next one. In addition, members of the NCRI are appointed every three years. Therefore, training them and increasing their capacity to draft a National Action Plan will ensure sustainability of this activity for at least three years. Moreover, most of them are civil servants. Therefore, this activity will enhance institutional capacity.

Thirdly, the material produced in the context of the project (e.g. the Guide) will be used long after the termination of the project.

Fourthly, the capacity building and awareness raising activities of the project are expected to have long term results not only for the direct beneficiaries of the respective activities, but also for other members of the respective target group. For instance, prosecutors will be trained as trainers, so that they will be able to train themselves other prosecutors in the future. The objective of the trainings is to strengthen the capacities of prosecutors in investigating hate crimes, to increase awareness of international norms and standards of hate speech, and to consolidate knowledge of international human rights protection mechanisms and the procedures involving the dealing with fighting against racism, intolerance and hate crimes. It is certain that the prosecutors' training will lay the foundation for new principles in training for prosecutors by adopting peer-to-peer training, transferring thus skills from knowledgeable and experienced professionals to others, allowing for all personal and professional development and improving the expertise of all.

The trust building educational meetings between public prosecutors and targeted communities will also increase victims' access to justice in the future and will improve the cooperation between victims, NGOs and law enforcement agents. Apart from that, following the day conference, there will be gathering of information about the reaction of citizens towards the discussed legal initiatives with simple visualised examples, attraction of citizens' opinions, who have lost their interest in politics, presentation of the project in schools and universities (visitors of Hellenic Parliament Foundation), and promotion as well as effective networking across the European Union with the contribution of news agencies, media, universities, technological companies and non-governmental organizations.

All the above will also promote capacity building for prosecutors, public officers and MPs, as well as targeted communities. Additionally, the awareness raising campaign is expected to combat social stereotypes and to change obsolete perceptions. Finally, both the Evaluation Report and the Report on the European Added Value of the project will also focus on the issues of sustainability and long-term results and will provide proposals to guarantee such results.

Finally yet importantly, the Ministry of Justice will promote the project as well as the Action Plan in every suitable occasion (e.g. public speeches of the political leadership of the Ministry of Justice, reference to the project in national reports to international organizations, in parliamentary scrutiny, etc.). In general, since the project's activities form a part of Greece's national policy against racism, intolerance and hate crimes, they will be widely disseminated by state agents in Greece and abroad.

13. Ethical issues related to the project

Describe any ethical issues which you could come across during the implementation of your project, including with regard to interactions with target groups or persons benefiting from the project, and present your strategy to address them.

We do not expect to come across ethical issues. In the lifetime of similar projects, neither partners nor persons has raised ethical issues. Concerning the implication of the Parliament in the proposal, which is considered as a “closed environment”, we would like to mention that the Parliament has participated in many European funded programs through the years. In the profile of the Hellenic Parliament that accompanied the initial proposal, an objective in HeP’s strategic plan is “Constant communication with citizens and society with all available communication means”. Moreover, another one day conference has been organised on the 15th of March 2019. [As a relevant reference, please find a link to the conference site for migrants that EPIS (European Programs Implementation Service) organized at the Senate Hall of the Hellenic Parliament through the European Program “Science meets Parliaments /Science meets Regions” of the European Commission (EC), represented by the DG Joint Research Center (JRC) (DG JRC) JRC/BRU/2018/A.3/0008/ NC <http://www. www.eusci4parl.gr/en-gb/Home »>].

Concerning the Awareness Raising Campaign, which will be subcontracted, we should stress out that subcontracting will be assigned to specialized Legal Entities and persons qualified for the particular tasks. Moreover, subcontracts will be procured and awarded according to European and national law. When working with contracts, there are often many stipulations and requirements between the two parties involved. Sometimes, these stipulations may violate ethical beliefs and values. We will make sure that there will not be any restrictions of race or ethnicity in the contracts. Moreover, we have already classified as confidential deliverables such as meetings, workshops and conferences, so that we do not violate any human right.

In any case, security and privacy concerns will be thoroughly considered. We will ensure that short-term considerations do not prevail long-term considerations, in particular around implementation risks and security loopholes. The solutions will be designed to maximise the trust of stakeholders. Security will take into account: electronic and physical security, ensuring the traffic of data and the execution of processes are protected against malevolent third parties; and principles of personal data protection guaranteeing that interactions of (end) users are secure, respect privacy policies, are based on user-consent and provide for mechanisms of redress.

14. Mainstreaming

How do you plan to ensure mainstreaming of equality between women and men and the rights of the child, and respect of the Charter of Fundamental Rights in the activities of your project?

Gender perspective has been taken into consideration during the decision-making process and the preparation of the present application. All activities proposed refer equally to both women and men. Moreover, gender-mainstreaming will be taken into account in the implementation of all activities of the project. For instance, concerning the choice of Prosecutors who will participate in the training, the selection will be based among others on attaining a gender balance. Gender can be the single or one of multiple grounds of racism and discrimination. Moreover, the role of gender in hate crimes will also be addressed. Gender equality will also be promoted in the National Action Plan against Racism and Intolerance. All communication tools will give prominence to gender mainstreaming, in order to avoid the creation or reinforcement of inequalities.

Moreover, children related issues will also be addressed in each respective activity. For instance, hate crimes involving children will be approached both as hate crimes and as crimes against children, requiring additional guarantees in order to avoid secondary victimization.

The Charter of Fundamental Rights, the European Convention on Human Rights and other international human rights conventions, as well as guidelines and recommendations of human rights bodies and expert groups will also be taken into consideration for the implementation of the activities.

15. Description of child protection policy

If applicable

If the applicant and/or any of the partners work directly with/have contact with children, provide a description of the child protection policy of these organisations, covering the following topics:

- purpose of the child protection policy;
- application of the policy (applicable to which staff, in which situations);
- responsibility: who is responsible for ensuring that the policy is adhered to;
- description of recruitment and screening processes with regard to child protection policy (details of training on child protection policy and rights of the child, screening, vetting (criminal background check). Preventing harm to children: processes exist to help minimise the possibility of children being abused by those in positions of trust.

Not applicable

16. English translation of the abstract

If applicable

Not applicable

History of changes between your proposal and Annex I to the Grant Agreement "Description of the Action"

Please state whether you have made any changes in the data entered in on-line forms in the participant portal (which will become part A of the Description of the Action) when compared to part B of the original proposal (*Description of workpackages and activities*).

Changes suggested in the Evaluation Summary Report	YES	<p>Taken into consideration the complementary data and information suggested in the Evaluation Summary Report and in the Grant Data Agreement Preparation, we present the following changes:</p> <ul style="list-style-type: none"> - Risks: Analytical record of risks regarding our proposal and addition of mitigation measures (more information about how to overcome the risk of members of the Parliament and public prosecutors declining the participation in the workshops and the one-day-conference). - Deliverables: New classification in accordance with the instructions provided in the Grant Data Agreement Preparation in the Portal, and removal of the deliverables: questionnaires for the workshop, for the educational meetings and for the trainings, and for the report for the one-day-conference. - Effort: New calculation of the effort, according to the instructions provided in the Grant Data Agreement Preparation in the Portal. - Electronic access of deliverables: We added the information that the "Media Plan", the "Guide for the Rights of Hate crime victims", the "Evaluation report" and the "Report for the European added value will be also available electronically. The printed reports of the project review meetings will also be electronically available.
Other changes	YES	<p>Milestones: On applying the changes suggested, we have further delved into the project and thus, have come to revisit the series of milestones set and decreased them to better mark the project's goals.</p>

Please state whether you have made any changes in part B of the Description of the Action when compared to part B of the original proposal (*General Description of the project and applicant organisation*).

<p>Changes suggested in the Evaluation Summary Report</p>	<p>YES</p>	<p>There are no changes, only complementary data and information suggested in the Evaluation Summary Report and in the Grant Data Agreement Preparation, regarding the following:</p> <ul style="list-style-type: none"> - Timeline in section 6: <ul style="list-style-type: none"> ✓ We have replaced the previous timeline according to the instructions provided on the Grant Data Agreement Preparation (pp. 10-11). - National Action Plan against Racism and Intolerance: <ul style="list-style-type: none"> ✓ process of creating the Action Plan stressing out the fact that it will be drafted in a participative way since the NCRI which is responsible for drafting the Action Plan consists of non-governmental bodies, labor organizations and most importantly the Racist Violence Recording Network, an "umbrella" organization of civil society where 46 NGOs participate (p.4), ✓ project activities introduced in Action Plan (p. 4), - Ethical assessment: <ul style="list-style-type: none"> ✓ Concerning Hellenic Parliament (p.20) ✓ Concerning Awareness Raising Campaign (p. 20) - Awareness raising Campaign: <ul style="list-style-type: none"> ✓ Information channels (p.17) ✓ Evaluation of Campaign's success (p. 16) - Implementation of the Victims' Rights Directive (Framework Decision 2008/913/JHA): <ul style="list-style-type: none"> ✓ activities that will contribute to its implementation (p. 3). - Capacity building: <ul style="list-style-type: none"> ✓ selection procedure of members of the Parliament (pp. 8-9), ✓ identification of public prosecutors (p. 8), ✓ details for capacity building workshops for public authorities (pp. 7 & 19) - Innovative aspects of the project: <ul style="list-style-type: none"> ✓ concerning the National Action Plan (pp. 3-4) ✓ concerning the meetings for trust building between prosecutors and communities at risk of hate crimes (p. 4). - Sustainability measures concerning: <ul style="list-style-type: none"> ✓ training for prosecutors (pp. 7-8 & 19).
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		<ul style="list-style-type: none"> ✓ sustainability and impact of the Action Plan and how it will be used after the project to achieve the short and long terms objectives of the calls (pp. 18-19) ✓ the capacity building workshops for public authorities (p. 19) - Mitigation of risks concerning the project's implementation: <ul style="list-style-type: none"> ✓ About the selection and retainment of public prosecutors (p. 14), ✓ About the selection of members of the parliament (p.14). - Addition of number of copies: <ul style="list-style-type: none"> ✓ 6 printed reports for every project review meeting (p. 7), ✓ 10 for the Evaluation Report (p. 9), ✓ 30 for the Report on the European Added Value (p. 9). - Changes concerning subcontracting: <ul style="list-style-type: none"> ✓ We have erased the phrase "The printing of the Guide will be assigned to a subcontractor" (p. 7). ✓ In section 8 entitled "Subcontracting" (p.13), we made clear that subcontracting is only applied for the drafting of the Media Plan and the running of the Awareness raising Campaign. In addition, in Work Package 2, we have erased the phrase "subcontracting is applied for the printing of the National Action Plan against Racism and Intolerance", in Work Package 4, the phrase "subcontracting is applied for the printing of the Guide for the Rights of Hate Crime Victims and for additional services required in the events (for instance catering services)", and in Work Package 5, the phrase "subcontracting is applied for the printing of the Evaluation Report and the Report on the European Added Value" (p.13).
Other changes	NO	No of section/page(s), concise description of the change(s)

Note: Please note that changes to your original proposal should be limited to modifications suggested in the Evaluation Summary Report. We strongly advise against any other changes at this point as they may lead to the Commission considering the modified proposal as not compliant with the one recommended for funding and terminating the grant agreement preparation. Should you wish to introduce some modifications nevertheless (e.g. as a result of "force majeure" changes that occurred since the date of your original proposal), these must be indicated in the table. Failure to clearly signal any changes made to your proposal may lead to termination of the grant agreement preparation or – at any point following the signature of a grant agreement – to the termination of the grant agreement by the Commission. In accordance with Art. 34.3.1 (i)(ii).

ESTIMATED BUDGET FOR THE ACTION (page 1 of 2)

Estimated eligible ¹ costs (per budget category)										EU contribution			Action's estimated receipts			
A. Direct personnel costs	B. Direct travel and subsistence costs				C. Direct costs of subcontracting	[D. Direct costs of fin. support]	E. Other direct costs	F. Indirect costs ¹	Total costs	Reimbursement rate % ⁴	Maximum EU contribution ⁵	Maximum grant amount ⁶	Income generated by the action	Financial contributions given by third parties to the beneficiaries	Action's total receipts	
A.1 Employees (or equivalent) A.2 Natural persons under direct contract and seconded persons	B.1 Travel	B. Subsistence				D.1 Financial support D.2 Prizes	E.1 Equipment E.2 Other goods and services									
Form of costs ⁷	Actual	Actual	Actual	Unit ⁸		Actual	Actual	Actual	Flat-rate ⁹							
	a	b1	[b2]	No	Total [b2]	c	[d]	e	f = flat-rate * (a + b1 + b2 + c + [d] + e)	g = a + b1 + b2 + c + [d] + e + f	h	i = g * h	j	k	l	m = k + l
1. GMI	74,412.00	400.00	400.00			70,000.00	0.00	1,000.00	10,234.84	156,446.84	80	125,157.47	125,157.47	0.00	0.00	0.00
2. EPIS	0.00	3,200.00	2,800.00			0.00	0.00	19,000.00	1,750.00	26,750.00	80	21,400.00	21,400.00	0.00	0.00	0.00
3. UPSPS	35,340.00	0.00	0.00			0.00	0.00	15,000.00	3,523.80	53,863.80	80	43,091.04	43,091.04	0.00	0.00	0.00
Total consortium	109,752.00	3,600.00	3,200.00			70,000.00	0.00	35,000.00	15,508.64	237,060.64	80	189,648.51	189,648.51	0.00	0.00	0.00

ESTIMATED BUDGET FOR THE ACTION (page 2 of 2)

- (1) See Article 6 for the eligibility conditions.
- (2) The consortium remains free to decide on a different internal distribution of the EU funding (via the consortium agreement; see Article 25.3)
- (3) The indirect costs claimed must be free of any amounts covered by an operating grant (received under any EU or Euratom funding programme). A beneficiary that receives an operating grant during the duration of the action cannot claim any indirect costs for the year(s) covered by the operating grant (see Article 6.2.F)
- (4) For the reimbursement rate, see Article 5.2
- (5) This is the theoretical amount of the EU contribution, if the reimbursement rate is applied to all the budgeted costs. This theoretical amount is capped by the 'maximum grant amount'
- (6) The 'maximum grant amount' is the maximum grant amount decided by the Commission. It normally corresponds to the requested grant, but may be lower
- (7) See Article 5 for the cost forms
- (8) See Annex 2a 'Additional information on the estimated budget' for the details (units, cost per unit)
- (9) For the flat rate, see Article 6.2.F

ACCESSION FORM FOR BENEFICIARIES

HELLENIC PARLIAMENT (EPIS), established in Vassilissis Sofias 11, Athens 106 71, Greece, ('the beneficiary'), represented for the purpose of signing this Accession Form by the undersigned,

hereby agrees

to become beneficiary No ('2')

in Grant Agreement No 847643 ('the Grant Agreement')

between MINISTRY OF JUSTICE, TRANSPARENCY AND HUMAN RIGHTS **and** the European Union ('the EU'), represented by the European Commission ('the Commission'),

for the action entitled Developing a comprehensive strategy against racism, intolerance and hate crime (HC).

and mandates

***the coordinator** to submit and sign in its name and on its behalf any **amendments** to the Agreement, in accordance with Article 39.*

By signing this Accession Form, the beneficiary accepts the grant and agrees to implement it in accordance with the Agreement, with all the obligations and conditions it sets out.

SIGNATURE

For the beneficiary/new beneficiary/new coordinator

ACCESSION FORM FOR BENEFICIARIES

PANTEIO PANEPISTIMIO KOINONIKON KAIPOLITIKON EPISTIMON (UPSPS), established in ODOS SYNGROU 136, KALLITHEA ATHINA 176 71, Greece, VAT number: EL090015175, ('the beneficiary'), represented for the purpose of signing this Accession Form by the undersigned,

hereby agrees

to become beneficiary No ('3')

in Grant Agreement No 847643 ('the Grant Agreement')

between MINISTRY OF JUSTICE, TRANSPARENCY AND HUMAN RIGHTS **and** the European Union ('the EU'), represented by the European Commission ('the Commission'),

for the action entitled Developing a comprehensive strategy against racism, intolerance and hate crime (HC).

and mandates

the coordinator to submit and sign in its name and on its behalf any ***amendments*** to the Agreement, in accordance with Article 39.

By signing this Accession Form, the beneficiary accepts the grant and agrees to implement it in accordance with the Agreement, with all the obligations and conditions it sets out.

SIGNATURE

For the beneficiary/new beneficiary/new coordinator

MODEL ANNEX 4 JUST MGA — MULTI

FINANCIAL STATEMENT FOR [BENEFICIARY [name] / AFFILIATED ENTITY [name]] FOR REPORTING PERIOD [reporting period]

Eligible ¹ costs (per budget category)										Receipts			EU contribution			
A. Direct personnel costs		B. Direct travel and subsistence costs			C. Direct costs of subcontracting		[D. Direct costs of fin. support]	E. Other direct costs	F. Indirect costs ²	Total costs	Income generated by the action	Financial contributions given by third parties to the beneficiaries	Total receipts	Reimbursement rate ³ %	Maximum EU contribution ⁴	Requested EU contribution
A.1 Employees (or equivalent) A.2 Natural persons under direct contract seconded persons		B.1 Travel	B.2 Subsistence				[D.1 Financial support] [D.2 Prizes]	E.1 Equipment E.2 Other goods and services								
Cost form ⁵	Actual	Actual	Actual	Unit ⁶		Actual	Actual	Actual	Flat-rate ⁷							
	a	b1	[b2]	No	Total [b2]	c	[d]	e	f = flat-rate * (a + b1 + b2 + c [+d] + e)	g = a + b1 + b2 + c [+d] + e + f	h	i	j = h + i	k	l	m
[short name beneficiary / affiliated entity]																

The beneficiary/affiliated entity hereby confirms that:
 The information provided is complete, reliable and true.
 The costs declared are eligible (see Article 6).
 The costs can be substantiated by adequate records and supporting documentation that will be produced upon request or in the context of checks, reviews, audits and investigations (see Articles 12, 13 and 17).
 For the last reporting period: that all the receipts have been declared (see Article 5.3.3).

¹ Please declare all eligible costs, even if they exceed the amounts indicated in the estimated budget (see Annex 2). Only amounts that were declared in your individual financial statements can be taken into account later on, in order to replace other costs that are found to be ineligible.

¹ See Article 6 for the eligibility conditions.

² The indirect costs claimed must be free of any amounts covered by an operating grant (received under any EU or Euratom funding programme). A beneficiary that receives an operating grant during the duration of the action cannot claim any indirect costs for the year(s) covered by the operating grant (see Article 6.2.F).

³ See Article 5.2 for the reimbursement rate.

⁴ This is the theoretical amount of EU contribution that the system calculates automatically (by multiplying the reimbursement rate by the total costs declared). The amount you request (in the column 'requested EU contribution') may be less.

⁵ See Article 5.2 for the cost forms.

⁶ See Annex 2a 'Additional information on the estimated budget' for the details (units, cost per unit).

⁷ See Article 6.2.F for the flat-rate.

ANNEX 5

MODEL FOR THE CERTIFICATE ON THE FINANCIAL STATEMENT (CFS)

This document sets out:

- the objectives and scope of the independent report of factual findings on costs declared under a EU grant agreement financed under the Rights equality and citizenship Programme 2014-2020 or the Justice Programme 2014-2020 and
- a model for the certificate on the financial statement (CFS).

1. Background and subject matter

[OPTION 1 for actions with one RP and NO interim payments: Within 60 days of the end of the reporting period, the coordinator must submit to the Commission a **final report**, which should include (among other documents and unless otherwise specified in Article 15 of the Grant Agreement) a **certified financial statement** (CFS; see proposed model below) for each beneficiary and (if applicable) each affiliated entity, if:

- the cumulative amount of payments the beneficiary/affiliated entity requests as reimbursement of actual costs is EUR 325 000 or more and
- the maximum EU contribution indicated for that beneficiary/affiliated entity in the estimated budget (see Annex 2) as reimbursement of actual costs is EUR 750 000 or more.]

[OPTION 2 for actions with several RPs and interim payments: Within 60 days of the end of each reporting period, the coordinator must submit to the Commission a **periodic report**, which should include (among other documents and unless otherwise specified in Article 15 of the Grant Agreement) a **certified financial statement** (CFS; see proposed model below) for each beneficiary and (if applicable) each affiliated entity, if:

- the cumulative amount of payments the beneficiary/affiliated entity requests as reimbursement of actual costs is EUR 325 000 or more and
- the maximum EU contribution indicated for that beneficiary/affiliated entity in the estimated budget (see Annex 2) as reimbursement of actual costs is EUR 750 000 or more.

The CFS must be submitted every time the cumulative amount of payments requested (i.e. including in previous financial statements) reaches the threshold (i.e. a first certificate once the cumulative amount reaches 325 000, a second certificate once it reaches 650 000, a third certificate once it reaches 975 000, etc.).

Once the threshold is reached, the CFS must cover all reporting periods for which no certificate has yet been submitted.]

The beneficiary must provide the CFS for itself and, if applicable, for its affiliated entity(ies).

The **purpose** of the audit on which the CFS is based is to give the Commission ‘reasonable assurance’¹ that costs declared as eligible costs under the grant (and, if relevant, receipts generated in the course of the action) are being claimed by the beneficiary in accordance with the relevant legal and financial provisions of the Grant Agreement.

The **scope** of the audit is limited to the verification of eligible costs included in the CFS. The audit must be conducted in line with point 3 below.

Certifying auditors must carry out the audits in compliance with generally accepted **audit standards** and indicate which standards they have applied. They must bear in mind that, to establish a CFS, they must carry out a compliance audit and not a normal statutory audit. The eligibility criteria in the Grant Agreement always override normal accounting practices.

The beneficiary and the auditor are expected to address any **questions on factual data or detailed calculations** before the financial statement and the accompanying certificate are submitted. It is also recommended that the beneficiary take into account the auditor’s preliminary comments and suggestions in order to avoid a qualified opinion or reduce the scope of the qualifications.

Since the certificate is the main source of assurance for cost claims and payments, it will be easier to consider amounts as eligible if a **non-qualified certificate** is provided..

The submission of a certificate does not affect the Commission’s right to carry out its **own assessment or audits**. Neither does the reimbursement of costs covered by a certificate preclude the Commission, the European Anti-Fraud Office or the European Court of Auditors from carrying out checks, reviews, audits and investigations in accordance with Article 17 of the Grant Agreement.

The Commission expects the certificates to be issued by auditors according to the highest professional standards.

2. Auditors who may deliver a certificate

The beneficiary is free to choose a **qualified external auditor**, including its usual external auditor, provided that:

- the external auditor is **independent** from the beneficiary and
- the provisions of **Directive 2006/43/EC**² are complied with.

¹ This means a high degree of confidence.

² Directive [2006/43/EC](#) of the European Parliament and of the Council of 17 May 2006 on statutory audits of annual accounts and consolidated accounts or similar national regulations (OJ L 157, 9.6.2006, p. 87).

Independence is one of the qualities that permit the auditor to apply unbiased judgement and objective consideration to established facts to arrive at an opinion or a decision. It also means that the auditor works without direction or interference of any kind from the beneficiary.

Auditors are considered as providing services to the beneficiary under a **purchase contract** within the meaning of Article 9 of the Grant Agreement. This means that the costs of the CFS may normally be declared as costs incurred for the action, if the cost eligibility rules set out in Articles 6 and 9.1.1 of the Grant Agreement are fulfilled (especially: best value for money and no conflict of interests; see also below eligibility of costs of other goods and services). Where the beneficiary uses its usual external auditor, it is presumed that they already have an agreement that complies with these provisions and there is no obligation to find new bids. Where the beneficiary uses an external auditor who is not their usual external auditor, it must select an auditor following the rules set out in Article 9.1.1.

Public bodies can choose an external auditor or a competent public officer. In the latter case, the auditor's independence is usually defined as independence from the audited beneficiary 'in fact and in appearance'. A preliminary condition is that this officer was not involved in any way in drawing up the financial statements. Relevant national authorities establish the legal capacity of the officer to carry out audits of that specific public body. The certificate should refer to this appointment.

3. Audit methodology and expected results

3.1 Verification of eligibility of the costs declared

The auditor must conduct its verification on the basis of inquiry and analysis, (re)computation, comparison, other accuracy checks, observation, inspection of records and documents and by interviewing the beneficiary (and the persons working for it).

The auditor must examine the following documentation:

- the Grant Agreement and any amendments to it;
- the periodical and/or final report(s);
- *for personnel costs*
 - salary slips;
 - time sheets;
 - contracts of employment;
 - other documents (e.g. personnel accounts, social security legislation, invoices, receipts, etc.);
 - proofs of payment;
- *for travel and subsistence costs*
 - the beneficiary's internal rules on travel;
 - transport invoices and tickets (if applicable);
 - declarations by the beneficiary;
 - other documents (proofs of attendance such as minutes of meetings, reports, etc.);
 - proofs of payment;
- *for equipment costs*
 - invoices;
 - delivery slips / certificates of first use;

- proofs of payment;
- depreciation method of calculation;
- *for subcontracting*
 - the call for tender;
 - tenders (if applicable);
 - justification for the choice of subcontractor;
 - contracts with subcontractors;
 - invoices;
 - declarations by the beneficiary;
 - proofs of payment;
 - other documents: e.g. national rules on public tendering if applicable, EU Directives, etc.;
- *for costs of other goods and services*
 - invoices;
 - proofs of payment; and
 - other relevant accounting documents.

General eligibility rules

The auditor must verify that the costs declared comply with the general eligibility rules set out in Article 6.1 of the Grant Agreement.

In particular, the costs must:

- be actually incurred;
- be linked to the subject of the Grant Agreement and indicated in the beneficiary's estimated budget (i.e. the latest version of Annex 2);
- be necessary to implement the action which is the subject of the grant;
- be reasonable and justified, and comply with the requirements of sound financial management, in particular as regards economy and efficiency;³
- have been incurred during the action, as defined in Article 3 of the Grant Agreement (with the exception of the invoice for the audit certificate and costs relating to the submission of the final report);
- not be covered by another EU or Euratom grant (see below ineligible costs);
- be identifiable, verifiable and, in particular, recorded in the beneficiary's accounting records and determined according to the applicable accounting standards of the country where it is established and its usual cost-accounting practices;
- comply with the requirements of applicable national laws on taxes, labour and social security;
- be in accordance with the provisions of the Grant Agreement (see, in particular, Articles 6 and 9-11 a) and
- have been converted to euro at the rate laid down in Article 15.6 of the Grant Agreement:
 - for beneficiaries with accounts established in a currency other than the euro:
Costs incurred in another currency must be converted into euros at the average of the daily exchange rates published in the C series of the [EU Official Journal](#) determined over the corresponding reporting period.

³ To be assessed in particular on the basis of the procurement and selection procedures for service providers.

If no daily euro exchange rate is published in the EU Official Journal for the currency in question, the rate used must be the average of the monthly accounting rate established by the Commission and published on its [website](#);

- for beneficiaries with accounts established in euro:
Costs incurred in another currency should be converted into euros applying the beneficiary's usual accounting practice.

The auditor must verify whether expenditure includes **VAT** and, if so, verify that the beneficiary:

- cannot recover the VAT (this must be supported by a statement from the competent body) and
- is not a public body acting as a public authority.

The auditor should base his/her audit approach on the **confidence level** following a review of the beneficiary's internal control system. When using sampling, the auditor should indicate and justify the sampling size.

Specific eligibility rules

In addition, the auditor must verify that the costs declared comply with the specific cost eligibility rules set out in Article 6.2 and Articles 9.1.1, 10.1.1, 11.1.1, 11a.1.1 and 11a.2.1 of the Grant Agreement.

Personnel costs

The auditor must verify that:

- personnel costs have been charged and paid in respect of the actual time devoted by the beneficiary's personnel to implementing the action (justified on the basis of time sheets or other relevant time-recording system);
- personnel costs were calculated on the basis of annual gross salary, wages or fees (plus obligatory social charges, but excluding any other costs) specified in an employment or other type of contract, not exceeding the average rates corresponding to the beneficiary's usual policy on remuneration;
- the work was carried out during the period of implementation of the action, as defined in Article 3 the Grant Agreement;
- the personnel costs are not covered by another EU or Euratom grant (see below ineligible costs);
- for additional remunerations: the 2 conditions set out in Article 6.2.A.1 of the Grant Agreement are met (i.e. that it is part of the beneficiary's usual remuneration practices and is paid in a consistent manner whenever the same kind of work or expertise is required and that the criteria used to calculate the supplementary payments are objective and generally applied by the beneficiary, regardless of the source of funding used);
- for in-house consultants: the 3 conditions set out in Article 6.2.A.2 of the Grant Agreement are met (i.e. that the in-house consultant works under the beneficiary's instructions, that the result of the work carried out belongs to the beneficiary, and that the costs are not significantly different from those for personnel performing similar tasks under an employment contract).

The auditor should have assurance that the management and accounting system ensures proper allocation of the personnel costs to various activities carried out by the beneficiary and funded by various donors.

Travel and subsistence costs

The auditor must verify that travel and subsistence costs:

- have been charged and paid in accordance with the beneficiary's internal rules or usual practices (or, in the absence of such rules or practices, that they do not exceed the scale normally accepted by the Commission⁴;
- are not covered by another EU or Euratom grant (see below ineligible costs)
- were incurred for travels linked to action tasks set out in Annex 1 of the Grant Agreement;
- were incurred in the eligible countries set out in the call for proposals.

Equipment costs

The auditor must verify that:

- the equipment was acquired during the period of implementation of the action, as defined in Article 3 of the Grant Agreement;
- the equipment is purchased, rented or leased at normal market prices;
- public bodies have complied with the national rules on public procurement;
- the equipment is written off, depreciation has been calculated according to the tax and accounting rules applicable to the beneficiary and only the portion of the depreciation corresponding to the duration of the action has been declared and
- the costs are not covered by another EU or Euratom grant (see below ineligible costs).

Costs of other goods and services

The auditor must verify that:

- the purchase complies with best value for money (or lowest price) and that there was no conflict of interests;
- public bodies have complied with the national rules on public procurement;
- the costs are not covered by another EU or Euratom grant (see below ineligible costs).

Subcontracting costs

The auditor must verify that:

- the subcontracting complies with best value for money (or lowest price) and that there was no conflict of interests;
- the subcontracting was necessary to implement the action for which the grant is requested;
- the subcontracting was provided for in Annex 1 and Annex 2 or agreed to by the Commission at a later stage;

⁴ See the Guide for Applicants — Action Grants.

- the subcontracting is supported by accounting documents in accordance with national accounting law;
- public bodies have complied with the national rules on public procurement.

Ineligible costs

The auditor must verify that the beneficiary has not declared any costs that are ineligible under Article 6.4 of the Grant Agreement:

- costs relating to return on capital;
- debt and debt service charges;
- provisions for future losses or debts;
- interest owed;
- doubtful debts;
- currency exchange losses;
- bank costs charged by the beneficiary's bank for transfers from the Commission;
- excessive or reckless expenditure;
- deductible VAT;
- VAT incurred by a public body acting as a public authority;
- costs incurred during suspension of the implementation of the action;
- in-kind contributions from third parties;
- costs declared under other EU or Euratom grants (including those awarded by a Member State and financed by the EU or Euratom budget or awarded by bodies other than the Commission for the purpose of implementing the EU or Euratom budget); in particular, indirect costs if the beneficiary is already receiving an operating grant financed by the EU or Euratom budget in the same period;
- costs incurred for permanent staff of a national administration for activities that are part of its normal activities (i.e. not undertaken only because of the grant);
- costs incurred for staff or representatives of EU institutions, bodies or agencies;
- costs for activities that do/did not take place in one of the eligible countries specified in the call for proposals (unless approved by the Commission).

For more information on cost eligibility, see the Guide for applicants — Action Grants.

3.2 Verification of receipts

The auditor must verify that the beneficiary has declared receipts within the meaning of Article 5.3.3 of the Grant Agreement, i.e.:

- income generated by the action (e.g. from the sale of products, services and publications, conference fees) and
- financial contributions given by third parties, specifically to be used for costs that are eligible under the action.

3.3 Verification of the beneficiary's accounting system

The auditor must verify that:

- the accounting system (analytical or other suitable internal system) makes it possible to identify **sources of financing** for the action and related expenses incurred during the contractual period and

- expenses/income under the grant have been recorded systematically using a numbering system that **distinguishes** them from expenses/income for other projects.

Certificate on the financial statement (CFS)

To

[Beneficiary/affiliated entity's full name
address]

We, [full name of the audit firm/organisation], established in [full address/city/country], represented for signature of this audit certificate by [name and function of an authorised representative],

hereby certify

that:

1. We have **conducted an audit** relating to the costs declared in the financial statement of [name of beneficiary/affiliated entity] (the [beneficiary's]/[affiliated entity's]), to which this audit certificate is attached and which is to be presented to the European Commission under Grant Agreement No [insert number] — [insert acronym], covering costs for the following reporting period(s): [insert reporting period(s)].
2. We confirm that our audit was **carried out in accordance with generally accepted auditing standards** in compliance with ethical rules and on the basis of the provisions of the **Grant Agreement** and its Annexes (and in particular the audit methodology described in Annex 5).
3. The financial statement was examined and all necessary tests of [all/[X]]% of the supporting documentation and accounting records were carried out in order to obtain **reasonable assurance that**, in our opinion and on the basis of our audit
 - total costs of EUR [insert number] ([insert amount in words]) are eligible, i.e.:
 - actual;
 - determined in accordance with the [beneficiary's]/[affiliated entity's] accounting principles;
 - incurred during the period referred to in Article 3 of the Grant Agreement;
 - recorded in the [beneficiary's]/[affiliated entity's] accounts (at the date of this audit certificate);
 - comply with the specific eligibility rules in Article 6.2 of the Grant Agreement;
 - do not contain costs that are ineligible under Article 6.4 of the Grant Agreement, in particular:
 - costs relating to return on capital;
 - debt and debt service charges;
 - provisions for future losses or debts;
 - interest owed;
 - doubtful debts;
 - currency exchange losses;
 - bank costs charged by the [beneficiary's]/[affiliated entity's] bank for transfers from the Commission
 - excessive or reckless expenditure;

- deductible VAT;
 - VAT incurred by a public body acting as a public authority;
 - costs incurred during suspension of the implementation of the action;
 - in-kind contributions provided by third parties;
 - costs declared under other EU or Euratom grants (including those awarded by a Member State and financed by the EU or Euratom budget or awarded by bodies other than the Commission for the purpose of implementing the EU or Euratom budget); in particular, indirect costs if the [beneficiary]/[affiliated entity] is already receiving an operating grant financed by the EU or Euratom budget in the same period;
 - costs incurred for permanent staff of a national administration, for activities that are part of its normal activities (i.e. not undertaken only because of the grant);
 - costs incurred for staff or representatives of EU institutions, bodies or agencies;
 - costs for activities that do not take place in one of the eligible countries specified in the call for proposals (unless approved by the Commission);
 - [are claimed according to the euro conversion rate referred to in Article 15.6 of the Grant Agreement;]
- total **receipts** of EUR [insert number] ([insert amount in words]) have been declared under Article 5.3.3 of the Grant Agreement and
- the [beneficiary's]/[affiliated entity's] **accounting procedures** are in compliance with the accounting rules of the state in which it is established and permit direct reconciliation of the costs incurred for the implementation of the action covered by the EU grant with the overall statement of accounts relating to its overall activity.

[However, our audit opinion is **qualified** for:

- costs of EUR [insert number]
- receipts of EUR [insert number]

which in our opinion do not comply with the applicable rules.]

4. We are qualified/authorised to deliver this audit certificate [(for additional information, see appendix to this certificate)].
5. The [beneficiary]/[affiliated entity] paid a **price** of EUR [insert number] (including VAT of EUR [insert number]) for this audit certificate. [OPTION 1: These costs are eligible (i.e. incurred within 60 days of the end of the action referred to in Article 3 of the Grant Agreement) and included in the financial statement.][OPTION 2: These costs were not included in the financial statement.]

Date, signature and stamp

ANNEX 7

***[OPTION 1 if further pre-financing payments foreseen in Article 15.2a:
MODEL FOR THE STATEMENT ON THE USE OF THE PREVIOUS
PRE-FINANCING PAYMENT***

➤ For fields in **[grey in square brackets]**: enter the appropriate data

STATEMENT ON THE USE OF THE FIRST PRE-FINANCING PAYMENT

(To be filled out by the coordinator)

The undersigned:

- declares that [...] % of the first pre-financing payment of EUR [insert amount] paid for Grant Agreement No [insert number] — [acronym] have been used,
- declares that this is based on substantiated data (bank slip/treasury account) provided by each beneficiary,
- certifies that the information contained in the progress report is full, reliable and true, and is substantiated by adequate supporting documentation that can be produced in the context of checks, reviews, audits and investigations,
- requests a second pre-financing payment of EUR [insert amount].

SIGNATURE

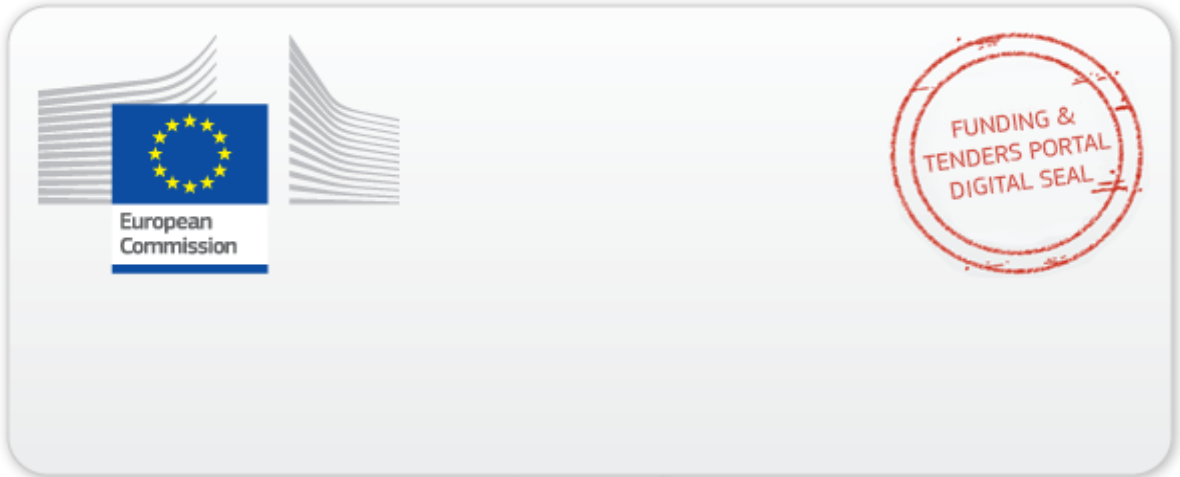
For the coordinator:

[electronic signature]

Done on [electronic time stamp]

/

[OPTION 2: Not applicable]



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