

Grant Management Rules

ACRONYMS	3
1 PURPOSE AND SCOPE.....	4
2 ROLES AND RESPONSIBILITIES	4
3 DEFINITIONS.....	5
3.1 GRANT.....	5
3.2 LEAD APPLICANT AND CO-APPLICANTS	5
3.3 BENEFICIARY(IES) AND COORDINATOR.....	5
3.4 ASSOCIATE ORGANIZATIONS.....	5
3.5 AFFILIATED ENTITIES	5
3.6 THIRD PARTIES.....	5
3.7 CONTRACTORS.....	5
4 PRINCIPLES OF ICMPD GRANT MANAGEMENT	5
4.1 TRANSPARENCY	5
4.2 EQUAL TREATMENT AND FAIRNESS.....	6
4.3 NON-RETROACTIVITY	6
4.4 CO-FINANCING.....	6
4.5 NO DOUBLE-FINANCING.....	6
4.6 NO-PROFIT	6
4.7 PROPORTIONALITY	6
5 GENERAL RULES	6
5.1 CODE OF ETHICS AND BUSINESS CONDUCT.....	6
5.2 COMMUNICATION AND OUTREACH	7
5.3 CROSS-CUTTING ISSUES.....	8
5.4 VISIBILITY RULES.....	8
5.5 DATA PROTECTION.....	8
5.6 RECORD KEEPING	8
5.7 GRANT MANAGEMENT DOCUMENTS.....	8
5.8 LANGUAGE.....	8
6 GRANT SCHEMES	8
6.1 TYPES OF GRANT SCHEMES.....	8
6.2 FORMS OF GRANTS	9
6.3 DEROGATIONS.....	10
7 CALL FOR PROPOSALS PREPARATION	10
7.1 CALL FOR PROPOSALS DOCUMENTS	10

Filename: Grant Management Rules		Distribution: ICMPD Employees	
Drafted	Approved	Released	Effective from
Finka	Brimbal	14/09/2022	14/09/2022

8	CALL FOR PROPOSALS APPLICATION STAGE	10
8.1	PUBLICATION AND ADVERTISING	10
8.2	QUESTIONS FROM APPLICANTS	10
8.3	ADDENDUM OF THE CALL FOR PROPOSALS	10
8.4	CANCELLATION OF A CALL FOR PROPOSALS	11
8.5	SUBMISSION OF PROPOSALS	11
9	EVALUATION PROCEDURE	11
9.1	GRANT EVALUATION COMMITTEE (GEC)	11
9.2	OPENING SESSION	12
9.3	EVALUATION CRITERIA	12
9.4	EXCLUSION CHECKS AND SANCTIONS LIST	13
9.5	CLARIFICATIONS DURING THE EVALUATION PROCEDURE	14
9.6	SCORING AND LIST OF PROPOSALS RECOMMENDED FOR FUNDING	14
9.7	RESULTS OF THE EVALUATION	14
10	COMPLAINTS	15
10.1	COMPLAINTS	15
11	GRANT CONTRACTING	15
11.1	THE SPECIAL CONDITIONS AND CONTRACT ANNEXES	15
11.2	BUDGET CLEARANCE	16
11.3	PRE-FINANCING GUARANTEE	16
11.4	DUE DILIGENCE REPORT	16
11.5	SIGNATURE OF THE GRANT CONTRACT	17
11.6	COMMUNICATION	17
12	MONITORING AND REPORTING	17
12.1	MONITORING	17
12.2	FIELD VISITS	17
12.3	REPORTING AND PAYMENTS	17
12.4	RECOGNITION OF COSTS	17
13	CLOSURE OF THE ACTION	17
13.1	CLOSURE OF THE GRANT CONTRACT	17

Acronyms

AEC	Administrative and Eligibility Check
CA	Contract Amendment
CFBM	Corporate Financial and Budget Management
DoM	Director of Management
GC	Grant Contract
GEC	Grant Evaluation Committee
M&E	Monitoring and Evaluation
PGU	Procurement and Grants Unit
PIT	Project Implementation Team
RMU	Resource Management Unit
RMO	Resource Management Officer(s)

1 Purpose and scope

The purpose of this document is to provide a normative framework for grant management in ICMPD, which aims to:

- ensure that grant applications are within the scope of ICMPD’s strategic goals;
- facilitate the coordination between all stakeholders involved in grant management throughout the grant lifecycle;
- ensure that ICMPD is compliant with uniform administrative and audit requirements for award of grants;
- minimise the risks inherent to grant management.

2 Roles and responsibilities

<p>Project Implementation Team</p>	<p>Supervises and monitors the implementation of the action throughout the grant lifecycle in accordance with the Grant Contract. Develops the Call for Proposals and Direct Award application package documents. Coordinates with the various internal stakeholders to ensure proper implementation of the grant scheme. Guides the beneficiary and acts as the ICMPD focal point during implementation of the action(s) financed by the grant scheme. Ensures adequate knowledge management and shares lessons learnt for content matters.</p>
<p>Procurement and Grants Unit (PGU) / Resource Management Unit (RMU) Brussels</p>	<p>Responsible for the administrative implementation of grant schemes. Ensures compliance with the legal framework. Checks and provides feedback on the Call for Proposals and Direct Award application package documents. Assumes responsibility for the communication with applicants during Call for Proposals stage and during evaluation. Ensures knowledge management and shares lessons learnt for process matters.</p>
<p>Resource Management Officer (RMO) / Resource Management Unit (RMU) Brussels</p>	<p>Monitors the overall financial implementation of grant schemes. Ensures that financial reports are in line with the legal framework as well as eligibility rules and regulations. Ensures knowledge management and shares lessons learnt for process matters.</p>
<p>Grant Evaluation Committee (GEC)</p>	<p>Assesses the feasibility, suitability and compliance of applications within the framework defined in the Call for Proposals and ensures transparency, equal treatment and fairness during the grant award process.</p>
<p>Corporate Financial and Budget Management (CFBM)</p>	<p>Puts in place measures to ensure that the financial risk for ICMPD remains reasonable. Executes payments and/or recovery orders. Defines the principles for the Grant Contract’s recognition of expenditure. Leads expenditure verification missions.</p>
<p>Director of Management (DoM)</p>	<p>Approves GEC compositions and GEC reports. In case of a recommendation to award, this shall constitute a decision of awarding a grant. Approves exceptions to the present rules.</p>

3 Definitions

3.1 Grant

A grant is a direct financial contribution from either ICMPD or a project budget to:

- finance a certain number of activities that together constitute an action;
- develop operational and/or financial capacities of the grant beneficiaries, thus covering their functional and structural costs.

The objective(s) of an action shall correspond and contribute to achieving either ICMPD's strategic goals or those of the project implemented by ICMPD defined in the framework governing the grant scheme.

3.2 Lead applicant and co-applicants

For proposals that are submitted by several applicants, one applicant shall assume the role of the lead applicant. The lead applicant is responsible for submitting an application and the completeness of the application documents. All communication regarding an application shall be channelled through the lead applicant. The other organisations involved in the application next to the lead applicant as implementing parties are called "co-applicants".

3.3 Beneficiary(ies) and coordinator

A beneficiary is the legal entity receiving a grant for an action and is responsible for its implementation in line with the applicable legal framework (Grant Contract). In case an application with co-applicants is selected for funding, the lead applicant shall be the "coordinator" of the action. The coordinator is the sole entity responsible for the grant vis-à-vis ICMPD. The other organisations involved in the application are called "co-beneficiaries". The coordinator is responsible for signing the grant agreement after having received all the required powers of attorney from co-applicants. The grant agreement will detail the specific obligations of the beneficiary and, where appropriate, of the coordinator and the co-beneficiaries.

3.4 Associate organizations

Other organisations may participate in an action as associate organisations where this serves the aim of the action. These organisations shall not be a party of a grant agreement concluded with ICMPD.

3.5 Affiliated entities

Affiliated entities are legal entities which have a specific relationship with a beneficiary. On that basis, they can incur eligible costs for the action covered by a grant under certain conditions. The definition of affiliated entities is provided in the documents governing a specific grant scheme.

3.6 Third parties

Entities other than beneficiaries, affiliated entities and associate organisations are considered as third parties. Third parties can provide a cash contribution to the implementation of the action but are not involved in the implementation of an action.

3.7 Contractors

Contractors are entities that enter in a contractual relationship with a beneficiary for the delivery of goods, works or services. They cannot be part of a Grant Contract. Contractors shall be chosen following the procurement rules governing a grant scheme.

4 Principles of ICMPD Grant Management

4.1 Transparency

The implementation of grant schemes shall be transparent. Relevant information shall be made available to all potential applicants/beneficiaries.

4.2 Equal treatment and fairness

No preferential treatment may be given to any potential applicant/beneficiary. This rule applies not only to the procedure of identifying and selecting beneficiaries but also during the implementation of an action.

4.3 Non-Retroactivity

Only costs related to activities implemented after the signature of a contract can be considered eligible. In exceptional and duly justified cases, costs incurred before contract signature may be considered retroactively eligible. Grants may not be awarded for actions already completed.

4.4 Co-financing

Actions shall be co-financed in order to maintain a certain level of ownership on the side of the beneficiary. The minimum percentage of co-financing is variable and shall be defined in the grant scheme. Co-financing can be an 'in-kind' (non-monetary) and/or direct 'financial' contribution depending on the grant scheme. Co-financing is always considered as a contribution from the beneficiary, even if a third party provides it. The percentage of co-financing as defined in the Call for Proposals and in the Special Conditions of the Grant Contract, which is used to establish the final amount of the grant. In exceptional and duly justified cases, co-financing may not be required.

4.5 No double-financing

Each action may give rise to the award of only one grant, there shall not be duplicate funding of the same action. Applicants shall indicate the sources and amounts of any other funding received or applied for in the same financial year for the same action including operating grants.

4.6 No-profit

A grant may not produce a profit for the beneficiary(ies) or for the partners, unless otherwise specified in the Special Conditions and non-application of no-profit principle is foreseen in these rules. Profit is defined as a surplus of the receipts over the eligible costs approved by ICMPD when the request for payment of the balance is made.

The no-profit principle shall not apply to:

- actions with the objective to reinforce the financial capacity of a beneficiary;
- actions that generate an income to ensure their continuity after the contract period;
- study, research, training or education support paid to natural persons or other direct support paid to natural persons most in need;
- low-value grants (i.e. grants of EUR 60 000 or less).

4.7 Proportionality

Measures adopted by ICMPD shall not exceed the limits of what is appropriate and necessary. The choice of a grant scheme and its implementation shall be proportionate to the subject and value of the desired action.

5 General rules

5.1 Code of ethics and business conduct

5.1.1 Standard provisions

1. Respecting Human Rights
2. Zero Tolerance for Sexual Exploitation and Sexual Abuse
3. Prohibition against Money Laundering and Support to Terrorism
4. Prohibition of Assistance to Drug Traffickers

5. Anti-trafficking in Persons
6. Prohibition Against the Use of Child Labour

ICMPD is committed to the principles of the Universal Declaration of Human Rights and the UN Global Compact, and expects its suppliers and partners to share these values. ICMPD does not tolerate, in any context, the use of servitude, child labour, forced labour, human trafficking or slavery in any part of its grant schemes. ICMPD's staff members/personnel shall not, either directly or indirectly, engage throughout the grant process in any practice inconsistent with international human rights laws and standards that prevent, inter alia, child labour, sexual exploitation and trafficking in human beings.

5.1.2 Standards of behaviour

5.1.2.1 Ethical behaviour

Impartiality and honesty

ICMPD staff members/personnel shall observe the highest standard of ethics throughout the grant scheme to ensure the integrity, fairness and transparency of the grant process. Grantees shall be selected and contracts awarded based on ICMPD's Grant Rules and defined selection and award criteria.

Segregation of duties

To reduce the risk of error, waste or wrongful acts and the risk of not detecting such problems, no single individual or team shall perform all key stages of a grant scheme. Duties and responsibilities shall be assigned systemically to a number of individuals to ensure that effective checks and balances are in place. The different stages of a grant scheme shall be carried out, to the extent possible, by different employees with the relevant competencies. As a minimum, two officials shall be involved in carrying out and reviewing the grant scheme.

Conflict of Interest

A conflict of interest exists where the impartial and objective exercise of an actor is compromised for reasons involving family, emotional life, political or national affinity, economic interest or any other direct or indirect personal interest. ICMPD can take various steps to mitigate the conflict of interest. This may include preventing staff members to work with the same beneficiary for a long period of time or having the employee sign a Declaration of Impartiality describing his or her relationship with the applicants or beneficiary(ies).

5.1.2.2 Counter fraud and corruption

Kickbacks

A kickback is an illegal payment intended as compensation for preferential treatment or any other type of improper services received. ICMPD does not pay money for, make use of, or accept gifts (gratuities, favours, services, commissions, discounts, entertainment, hospitality, loans etc.) to obtain, retain, or procure business or services.

False claim acts

A false claim occurs when a person knowingly submits false or inaccurate information to obtain payment from ICMPD. ICMPD, its employees, partners and contractors shall maintain high standards of ethical conduct governing the selection, award, implementation, and oversight of all program activities.

5.2 Communication and outreach

Communication

During the Call for Proposals period and during the evaluation of proposals, the communication with applicants is the responsibility of PGU/RMU. Relevant communication tasks can be delegated by PGU/RMU to PIT. For direct awards, the communication shall be channelled through the negotiation team. The modalities for communicating with applicants shall be defined in the Guidelines for Applicants.

Outreach

ICMPD uses different channels to reach potential applicants. These channels shall be defined prior to the publication of the Call for Proposals.

During the time between the publication of the Call for Proposals and the closing date for submission of applications, a range of methods may be used to ensure maximum outreach to potential applicants. Channels shall be chosen ensuring maximum transparency and equal treatment of all applicants taking into account the scope of a grant scheme.

All information and material shared for outreach purposes shall comply with ICMPD regulations. If any information or documents are decided to be shared via different channels, depending on the content, it shall be followed by a disclaimer.

5.3 Cross-cutting issues

Environmental issues, gender equality, accessibility for disabled people and other cross-cutting issues shall be taken into account by ICMPD, beneficiaries and the applicants for Call for Proposals. The decision on which aspects are considered shall align with the specific grant scheme.

5.4 Visibility rules

All project material shall follow ICMPD graphic standards including ICMPD typefaces and colours, as outlined in the ICMPD Corporate Design Manual. Additional donor visibility requirements may be followed when relevant.

5.5 Data protection

Data protection shall be handled in accordance with ICMPD's Data Protection Rules and Procedures.

5.6 Record keeping

ICMPD shall keep record of all relevant documents for the period of seven years. The period is extended if the agreement with the donor indicates a longer period.

Beneficiary(ies) shall keep all records, accounting and supporting documents related to the Grant Contract for the period indicated in the contract.

5.7 Grant management documents

The standard forms and templates shall be used in grant schemes. Any exception shall be authorized by PGU/RMU.

5.8 Language

The working language of grant management, grants procedures, and grant documents shall be English, unless otherwise agreed during the planning phase with the Project Implementation Team, Directorate and beneficiaries, if applicable.

6 Grant schemes

6.1 Types of grant schemes

Grant beneficiaries shall be identified through one of the two grant schemes:

- a) Direct Award: A non-competitive procedure where it is not necessary to organise a call for proposals before awarding grants. Direct award / contracting may be authorised by the CoOS in the following circumstances:
 - in case of a monopoly in which the beneficiary is the only entity able to implement the action;
 - when the beneficiary is already identified within the framework governing the grant scheme;

- when the value of the grant is very low (up to EUR 10,000 per grant) and it is not considered as part of larger grant scheme;
- when there is urgency, where such urgency was not foreseeable.

In such cases, a written record (negotiation report or note for the file) shall be provided documenting the process and providing appropriate reasons for such determination.

- b) Call for Proposals: A competitive procedure in which applicants submit proposals within a restricted or open deadline. In this case, maximum outreach to potential applicants shall be ensured. As a minimum requirement, the Call for Proposals shall be published on the ICMPD website.

Application deadlines can take the form of:

- a) Open deadline: The Call for Proposals is open for a determined period during which proposals can be submitted at any time. The evaluation procedure is continuous and repeats itself throughout the duration of the Call for Proposals as long as there is budget available.
- b) Restricted deadline: The Call for Proposals is published with a fixed deadline. The evaluation procedure covers all submitted proposals at the same time.

Calls for Proposals can be managed through one or two step procedure:

- a) 1-step procedure: all applicants are free to submit a full application.
- b) 2-step procedure: all applicants may ask to take part but only the applicants who have been shortlisted (on the basis of a concept note in response to a Call for Proposals launched through published guidelines for applicants) are invited to submit a full application.

Based on the nature of the Call for Proposals, the amount available for grants may be subdivided into different geographical and/or thematic lots.

6.2 Forms of grants

Grants may take the form of reimbursement of eligible costs based on the following forms:

- a) actual costs incurred by the beneficiary(ies) and affiliated entity(ies);
- b) one or more simplified cost options;
- c) A combination of a) and b).

Simplified costs options may take the form of:

- a) unit costs, which cover all or certain specific categories of eligible costs that are clearly identified in advance by reference to an amount per unit;
- b) lump sums, which cover in global terms all or certain specific categories of eligible costs that are clearly identified in advance;
- c) flat-rate financing, which covers specific categories of eligible costs, which are clearly identified in advance, by applying a percentage.

The methods used by the beneficiary(ies) to determine unit costs, lump sums, flat-rates shall be clearly described and substantiated in Annex III of the Grant Contract when relevant and shall ensure compliance with the principle of co-financing (as applicable) and no double-financing. The information used can be based on the beneficiary(ies)'s historical and/or actual accounting and cost accounting data, external information where available and appropriate, statistical data or expert judgment (provided by internally available experts or procured) or other objective information.

Use of financing not linked to costs can be used only in duly justified cases, confirmed by the donor (when relevant) and approved by CoOS.

6.3 Derogations

On a case-by-case analysis, the CoOS may approve derogations from the grant management rules. Derogations shall be kept limited to the necessary minimum and to be duly justified by an operational, policy or other need.

7 Call for Proposals preparation

7.1 Call for Proposals documents

The Call for Proposals documents shall at least include:

- a) Guidelines for Applicants,
- b) Application form,
- c) Budget form (with the exception of specific simplified cost options where due to their nature it is not relevant),
- d) Evaluation forms (Administrative and eligibility checks and award criteria evaluation),
- e) Grant Contract template with annexes,
- f) Legal entity form,
- g) Financial identification form.

Additional documents may be required depending on the specific Call for Proposals: (non-exhaustive list):

- a) Declaration of honour (mandatory for grants above 10,000 EUR),
- b) Due diligence form / Financial and operational capacity form,
- c) Mandates for co-applicants (If not included in the application form).

The Call for Proposals application package comprises the Call for Proposals documents used by the applicants to create their application.

Any exception to the required documentation shall be approved by PGU/RMU.

8 Call for Proposals application stage

8.1 Publication and advertising

ICMPD has the responsibility to notify the public of all Calls for Proposals unless duly justified restrictions are in place due to specific nature of a particular grant scheme. ICMPD fulfils this responsibility by announcing open Calls for Proposals on the ICMPD webpage and dedicated application platforms. Upon PGU/RMU approval, additional means, such as project specific websites, can be used.

The Call for Proposals documents are published centrally via modalities defined and administered by PGU/RMU. All information of general interest regarding a Call for Proposals shall be announced in a Clarification note via modalities defined and administered by PGU/RMU.

8.2 Questions from applicants

Applicants may ask questions about Call for Proposals via the modalities defined in the Guidelines for Applicants. ICMPD shall publish responses that are of general interest for all applicants via the modalities defined in the Guidelines for Applicants.

8.3 Addendum of the Call for Proposals

An addendum of a Call for Proposals shall be published in case changes to the Call for Proposals documents are required. Addenda shall be issued during the time between publication of the Call for Proposals and the last date that ICMPD can issue clarifications.

8.4 Cancellation of a Call for Proposals

ICMPD shall cancel a Call for Proposals at its own discretion if duly justified. A clarification note for cancellation shall be published.

8.5 Submission of proposals

Submission of proposals shall be organized as to ensure:

- a) equal treatment;
- b) confidentiality of application documents;
- c) integrity of data.

Electronic submission shall be preferred. The submission system shall ensure that:

- a) the exact time and date of the receipt of applications can be determined precisely;
- b) limited access to the application(s) only by authorised persons;
- c) during the different stages of the award procedure only authorised persons have access to the applications and may give access to the application as needed for the evaluation procedure;
- d) it is reasonably ensured that any attempt to infringe any of the conditions set out in points a) to c) can be detected.

9 Evaluation procedure

The indicative timeline of the evaluation and the evaluation criteria shall be outlined in the Guidelines for Applicants. The evaluation procedure shall include at the minimum the following steps:

- Establishment of the Grant Evaluation Committee,
- Opening session,
- Evaluation (Administrative and eligibility checks, selection and award criteria checks) and exclusion checks,
- Preparation of GEC report,
- Communication of results.

9.1 Grant Evaluation Committee (GEC)

A GEC is established on an ad hoc basis, and its composition shall cut across both technical and administrative services. The composition of a GEC shall be proposed by the Project Implementation Team as appropriate, and approved by the CoOS. Representatives of partner organisations and external or internal experts may also participate in the GEC as observers.

The minimum number of committee members is five, to be comprised of at least the following:

- A non-voting chairperson that is provided by PGU/RMU, who ensures the integrity of the evaluation process. The GEC chairperson is responsible for overall coordination of the evaluation process in accordance with ICMPD's grant rules and procedures;
- Three evaluators (voting members), who possess the technical or administrative capacities to give an informed opinion on proposals. The evaluators shall be ICMPD staff from the Project Implementation Team, internal experts and/or from other organisations. The voting members of the GEC have collective responsibility for decisions taken by the committee;
- A non-voting secretary, who supports the chairperson. The main responsibilities of this position are to prepare the GEC report and provide administrative support related to the evaluation process.

Additional members can be appointed to the GEC as evaluators (voting members), secretaries or observers. The chairperson of the GEC can invite additional observers to express their opinion on applications. The chair of the GEC and the evaluators are free to decide whether or not they take observers' opinions into consideration. Depending on the nature of a Call for Proposals, involvement of external assessors may be foreseen for different stages of evaluation process.

The principles of impartiality and confidentiality shall be observed by all members and observers of the GEC at all stages of the evaluation process. At the time of the GEC constitution, all members shall sign a declaration of impartiality and confidentiality form, confirming their personal independence and neutrality with regard to the subject matter dealt within the context of the specific grant scheme evaluation. Should these conditions cease to exist during the evaluation procedure, the GEC member concerned shall immediately inform the GEC chairperson and withdraw from the GEC. Any evaluator or observer who has or might have an actual or potential conflict of interest with any applicant shall declare it and immediately withdraw from the GEC.

Within its mandate, the GEC shall be responsible for the following:

- a) establishing a schedule for the main steps of the evaluation process;
- b) performing and/or confirming opening and administrative and eligibility checks;
- c) performing and/or confirming the operational and financial capacity check
- d) performing and/or confirming the evaluation of the award criteria of the proposals received;
- e) recommending the award of grant to the CoOS.

All decisions and recommendations taken by the GEC shall be recorded in written form in the GEC report and duly archived.

9.2 Opening session

Applications shall not be accessed until the opening session. At the opening session, the registration details of the proposals received are checked and the proposals numbered sequentially.

The register of proposals shall contain the following information:

- a) the registration number of the proposal;
- b) the date and hour of receipt;
- c) the reference of the Call for Proposals;
- d) the applicants name and address.

9.3 Evaluation criteria

Applications are evaluated on the basis of evaluation criteria established in the Guidelines for Applicants. The criteria shall be precise, non-discriminatory and not prejudicial to fair competition. They shall be established prior to the publication of the Call for Proposals to ensure a fair and transparent evaluation. The criteria shall not be modified during the evaluation.

9.3.1 Administrative and eligibility criteria

All proposals received within the given deadline shall be subject to administrative and eligibility checks to verify that they fulfil the criteria stated in the Guideline of Applicants.

If any of the requested information is missing or incorrect, the proposal may be rejected on that sole basis and shall not be evaluated further.

Following the opening session and the administrative and eligibility checks, the GEC shall decide on any contentious case and proceed with the evaluation of the proposals.

All GEC decisions on administrative compliance and eligibility shall be fully recorded and justified in the GEC report. ICMPD archives proposals not considered for further evaluation.

9.3.2 Selection criteria (operational, financial and other checks)

Applicants shall be selected based on clear and non-discriminatory selection criteria for the purpose of assessing that the applicant has sufficient financial, economic, technical and professional capacity to implement the proposed action. The chosen criteria shall be relevant, proportionate, non-discriminatory, may not go beyond the scope defined in the Call for Proposals Guidelines for Applicants and shall take account of the legitimate interests of the applicant, in particular, its right to the protection of its technical and business secrets. It shall be possible to verify compliance with the chosen criteria through documentary evidence.

9.3.3 Award criteria

Award criteria are specific to a Call for Proposals. They shall allow to assess the quality of applications in relation to the objectives of the Call for Proposals and ensure that those applications are selected which maximise the effectiveness of the funding provided. Award criteria shall be reasonable in number and as clear as possible so as not to render the evaluation of the applications more difficult.

Evaluations are made by using an evaluation grid. Where a scoring system is used, the overall assessment shall be based on the scores obtained under each heading (award criterion).

A minimum threshold of points shall be established in the Guidelines for Applicants. A minimum threshold may be established also for particular sections or headings. A proposal that does not reach the minimum threshold shall not be recommended for funding. In case of a Call for Proposals with a fixed deadline, the GEC report shall list all proposals received as well as their respective scores.

9.4 Exclusion checks and sanctions list

An applicant shall be excluded from participation in a grant scheme if they fall into one or more of the conditions/lists specified by the donor/contributor through the Agreement between ICMPD and the donor/contributor. ICMPD shall rely on the remedies provided by its donors/contributors. Nevertheless, such reliance shall be done with proportionality.

Without excluding the above paragraph, and in observance of the principle of proportionality, ICMPD shall exclude applicants from participation in Call for Proposals which were found in situations of:

- a) Bankruptcy, insolvency or winding-up procedures,
- b) Breach of obligations relating to the payment of taxes or social security contributions,
- c) Grave professional misconduct, including misrepresentation,
- d) Fraud,
- e) Corruption,
- f) Conduct related to a criminal organisation,
- g) Money laundering or terrorist financing,
- h) Terrorist offences or offences linked to terrorist activities,
- i) Child labour and other forms of trafficking in human beings.

The right of defence and the remedial measures put in place by the entity to demonstrate the applicant's reliability shall be taken into account when deciding on exclusion from funding on the above-mentioned situations.

9.5 Clarifications during the evaluation procedure

If clarifications regarding an application are required from applicants at any stage of the evaluation procedure, the request for clarification and further related communication on this matter is to be made in writing or in meetings chaired by PGU/RMU.

Clarifications shall not be requested if they would violate the principle of equal treatment.

9.6 Scoring and list of proposals recommended for funding

The GEC shall take a cooperative approach, looking for consensual results. In case consensus is not possible, the Chair will put the decision to the vote. Decisions are taken by simple majority of voting members.

Some frameworks governing the grant scheme could foresee a consultation process on proposals received involving stakeholders (e.g. EU Delegation or donor). The result of the consultation is informative for the GEC members and shall never be considered binding.

9.7 Results of the evaluation

9.7.1 Grant Evaluation Committee report

The results of the evaluation and the corresponding recommendation for award of a contract shall be contained in a written report prepared by PGU/RMU and countersigned by Chair, Secretary(ies) and evaluators (voting members). The report shall summarise the main elements of the evaluation procedure and justify the recommendation for awarding the contract to one or more applicants. The GEC report lists the proposals that are recommended for award with the related maximum amounts (ICMPD contribution and related percentages). Dissenting views, if any, shall be recorded in the report. The GEC report, including the recommendation to award a grant to the successful applicant(s) shall be approved by the CoOS, whose approval constitutes decision to award a grant.

9.7.2 Reserve list

A reserve list may be constituted based on the scores obtained in the evaluation and annexed to the GEC report. In case the funds available are not sufficient to cover the full costs of a proposal, the GEC shall decide how to proceed between the three options below:

Option 1: The GEC takes into consideration the first proposal in the reserve list that could fit within the budgetary envelope available.

Option 2: In the case of Calls for Proposals with open deadlines, the GEC decides to request resubmission of an equivalent proposal but with lower costs. This option is used when the nature of the activities is innovative and/or very specialised, and it is considered by the GEC members that some components of the proposal can be cut in order to fit the budget available.

Option 3: If the difference between the budget available and the total amounts of the proposals is low, the GEC could suggest ICMPD to reduce the amount of one or more grants in order to fit within the available envelope. Changes to the proposals in order to decrease the costs shall not modify the nature of the proposal and/or its methodological approach. The duration of the action may be subject to change in order to decrease the costs insofar as the methodology and the nature of the activities are not unreasonably affected.

The GEC report shall state the option chosen, if relevant.

9.7.3 Communication of results to applicants

Upon approval of the GEC report, the ICMPD representative responsible for the grant scheme shall inform all applicants about the results of the evaluation procedure via the modalities defined in the Guidelines for Applicants.

All applicants shall be informed of the outcome of the evaluation procedure within a reasonable time period, unless justifiable circumstances may prevent such information.

The communication to successful applicants shall stipulate that it does not constitute a formal commitment to issue a grant and should not be considered as such. Contracts are awarded based only on the finalisation of the contracting phase. If required, applicants shall also be notified of any recommendations and/or conditions for contract award set by the GEC.

9.7.4 Publication of results

To ensure the necessary visibility, grant award decisions shall be published in the most appropriate and proportionate manner. Awarded grants shall be listed at least on the ICMPD website and/or the website governing the grant scheme. Additional requirements may be stipulated in the legal framework governing the grant scheme. A list of all grants awarded in the course of a financial year shall be published the following year on the ICMPD website and, if relevant, in other appropriate media. In duly justified cases, an exception to the publication of the awarded entity may be granted by the CoOS based on a formal request from the beneficiary. ICMPD may also waive publication for reasons of confidentiality and security.

10 Complaints

10.1 Complaints

An applicant having a dispute or complaint regarding a grant procedure, shall address their complaint in writing to the CoOS. The written note shall provide details of the basis upon which the dispute or complaint is being lodged including:

- a clear statement regarding what they consider was defective in the grant process;
- copies of, or references to, information to support the complaint;
- a statement regarding what they wish to achieve as an outcome from the complaint procedure.

The CoOS shall investigate the complaint involving relevant ICMPD staff and reply to the complainant within 15 working days. If the /applicant is not satisfied with the answer received they may address himself to the Director General. The Director General shall establish a complaints committee and relevant procedures, taking on board, if so warranted, external experts. The decision of the complaints committee shall be binding for all parties.

11 Grant contracting

The Grant Contract shall be signed within a reasonable timeframe following the grant decision.

11.1 The Special Conditions and Contract Annexes

The Grant Contract comprises the Special Conditions and Contract Annexes:

- The Special Conditions specify the project duration, total project budget and the grant amount, grant percentage, reporting and payment schedule. In addition, they may specify other action specific conditions.
- Annex I: Description of the Action is based on the application form submitted and including potential changes resulting from clarifications requested. By signing the Contract, the Coordinator commits to implementing all activities described in this Annex and to deliver the stated outputs and results.
- Annex II: General Conditions specify the general obligations of the contract. This Annex describes obligations on reporting, provision of information, ownership of equipment,

evaluation/monitoring, accounts, technical and financial checks, extension, suspension, termination of the projects, payment methods and other legal issues.

- Annex III: Budget of the Action includes the breakdown of project costs, as well as the expected sources of funding and justification of costs.
- Annex IV: Procurement by Grant Beneficiaries describes the procedures to be followed in case of awarding contracts for services, supplies and works to external organisations.
- Annex V: Payment Request for Grant Contract and Financial Identification Form contains standard template for requesting payment and for providing bank information .
- Annex VI: Model Narrative and Financial Report contains standard templates for Interim, Final Narrative and Financial Reports.
- Annex VII: Terms of Reference for an Expenditure Verification of a Grant Contract (either contracted by ICMPD or the Coordinator)
- Annex VIII: Pre-financing Guarantee Form
- Annex IX: Transfer of Ownership of Assets presents template to be used in case of transfer of ownership of equipment/supplies to the local -beneficiary(ies) and/or final beneficiaries.
- Annex X: Provisional Financial Report and Forecast

The Special Conditions are drafted following the granting decision. The ICMPD contribution and the implementation period cannot be increased during the contracting phase. However, the figures can be lowered, if needed.

Any deviation from the General Conditions foreseen shall be stipulated in Article 7 of the Special Conditions. Deviations, among other reasons, can be due to the nature of the beneficiary (e.g. UN agency, pillar-assessed organisations, public entity) that may, by their very nature, require a less restrictive approach than foreseen in the General Conditions.

Modification of the Special Conditions and other contract annexes is subject to PGU/RMU authorization. If any of the annexes is not applicable for a contract, it shall be indicated so in the Special Conditions.

11.2 Budget clearance

During budget clearance RMO/RMU shall review the breakdown of costs. The purpose of the budget clearance is to ensure that all costs included in the final budget are eligible and correctly presented.

11.3 Pre-financing guarantee

To limit the financial risk of ICMPD and ensure proper implementation of the planned actions, Grant Contracts may require pre-financing guarantees.

Pre-financing guarantees may not be required for pillar-assessed organisations or government agencies.

11.4 Due diligence report

In case no pre-financing guarantee is provided by a beneficiary, CFBM will prepare a due diligence report. The due diligence analysis may be conducted at any point before contract signature, depending on the grant scheme.

The requirement for a due diligence report may be waived by CFBM for low-value grants (grants below EUR 60 000) or in other duly justified cases.

The pre-financing rate is confirmed by CFBM on request from PGU/RMU.

11.5 Signature of the Grant Contract

A Grant Contract shall be signed by a legal representative of each party of the contract.

Paper-based and electronic signature shall be accepted. If the contract is signed on paper, at least two originals shall be signed, one for each party to the contract.

11.5.1 Amendment of Grant Contract and revision of budget

A request for amendment can only be solicited by a formal letter signed by a legal representative of the entity concerned or in exceptional cases through ICMPD decision.

Substantial changes to the contract (including the value of the contract) shall be made by means of a Contract Amendment (CA). These shall be signed by a legal representative of each entity. Minor changes, such as change of address, change of contact person or changes of bank account can be made by written notification to be annexed to the existing contract.

11.6 Communication

All communication from beneficiaries to ICMPD shall be channelled through the coordinator of the project. Communication shall be requested in writing from the coordinator and answered by the same means. There shall not be direct communication with partners on contractual issues.

12 Monitoring and reporting

12.1 Monitoring

Contracts shall be monitored regularly. The purpose of the monitoring is to ensure contractual compliance and that the activities are implemented as per the methodology and related timeline described in Annex I. It ensures proper follow-up of the action and allows ICMPD to take any mitigation measures when needed.

12.2 Field visits

There are two types of missions: verification missions and monitoring missions. The verification mission focuses on the financial and procedural aspects of Grant Contract implementation and is led by CFBM. The monitoring mission focuses on content aspects and is led by the Project Implementation Team. It is highly advisable to conduct joint missions whenever possible.

Both types of mission shall be followed by the issuance of a mission report to be shared with the coordinator.

12.3 Reporting and payments

Reporting and payment timeframes and outputs to be provided to ICMPD by the coordinator shall be defined in the Grant Contract. Any request for divergence from the Grant Contract shall be requested in writing by the beneficiary.

12.4 Recognition of costs

CFBM will assess whether there is a need or not to issue a note on recognition of expenditure of the Grant Contract. If deemed necessary, this document will state the level of expenditure under a Grant Contract for a specific period.

13 Closure of the action

13.1 Closure of the Grant Contract

The Grant Contract is closed once the final balance payment has been settled, either with a balance payment from ICMPD to the coordinator or with a payment from the coordinator to ICMPD on the basis of recovery note.