



UK Research Office  
Brussels

# UKRO Technical Update on GAP for projects with UK organisations

22 September 2022



# About UKRO

## We support UK research intensive organisations

Unique partnership between UKRI and subscribing organisations

Provide a service to more than 140 subscribing organisations

A Brussels-based team of advisors

Part of UKRI's wider International team

UK National Contact Point for  
ERC and Marie Skłodowska-Curie Actions



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# State of play

- Association to Horizon Europe still main goal, UK ready to formalise Protocol I
  - Joint Declaration accompanied the TCA announcement
- European Commission's guidance in the [Q&A on the UK's participation in Horizon Europe](#) is valid
  - UK is considered to be associated – same rights as MS/AC at the application stage
  - **Continue to apply as beneficiary from Associated Country – NOT as Associated Partner**
- Timing for association not known – impact on your successful projects
  - Grant Agreement signature process is affected (association must be formalised for the UK participant to be able to sign GA in the capacity as a beneficiary)
  - UK Government has put short-term measures in place ([UK Horizon Europe Guarantee](#)) to ensure continuation of UK participation in successful projects (as Associated Partners)
    - **The Guarantee now covers all Horizon Europe calls that close on or before 31 December 2022**



# Useful links

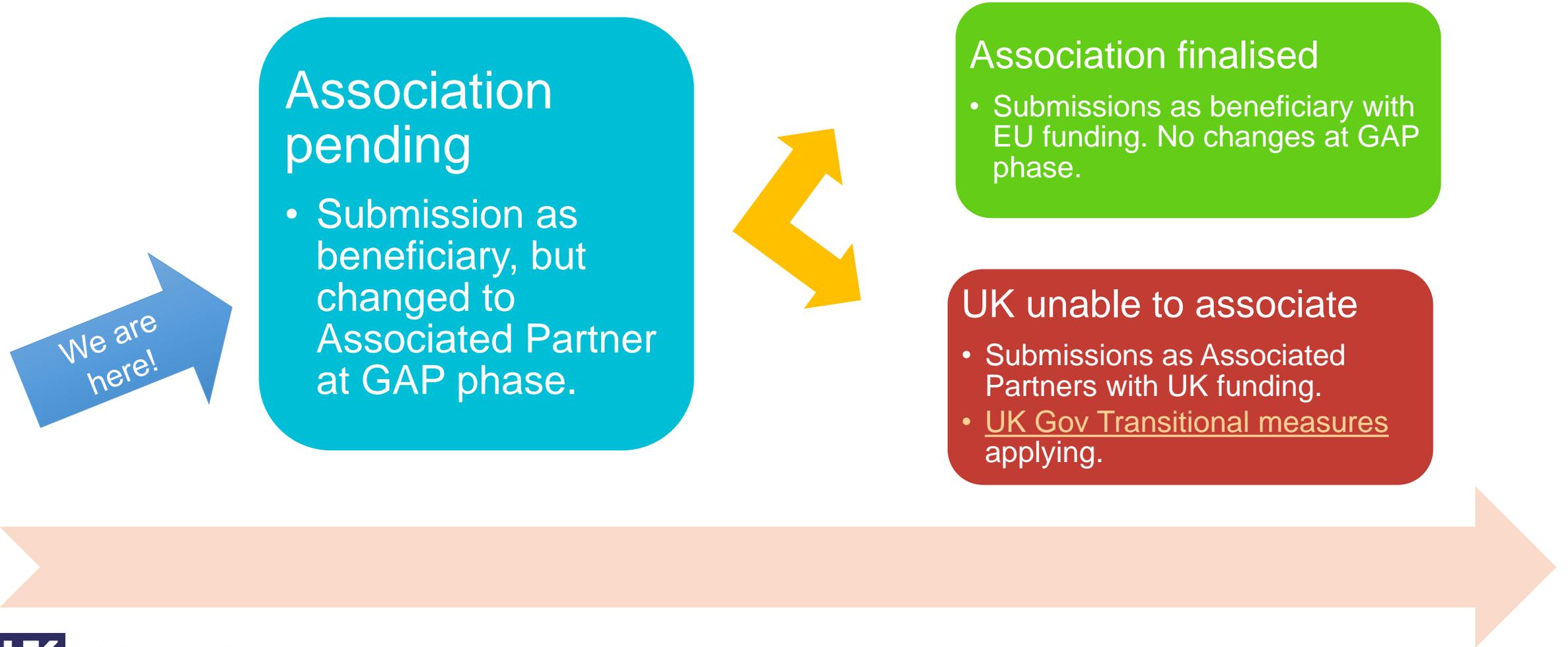
- [UKRO Q&A on GAP for Projects with UK Organisations](#)
- European Commission's Horizon Europe Coordinators' Day
  - [26 January 2022 – event's recording](#) and [15 June 2022 – event's recording](#)
- [UKRO factsheet on UK participation in EU Programmes](#)
- European Commission's [Q&A on the UK's participation in Horizon Europe](#)
- Universities UK International updates on UK participation in Horizon Europe (with UK Science and Innovation Network, Department for Business, Energy and Industrial Strategy and UKRO)
  - [previous events' recordings](#)
  - **Horizon Europe update - 28 September 2022 (10:00-11:00 BST) – [registration open](#)**
- [UK Government Horizon Europe guarantee official page](#)
- [UKRI How to apply for guarantee funding website](#)
  - Questions can be sent to [eugrantsfunding@ukri.org](mailto:eugrantsfunding@ukri.org)



# Grant Preparation process



# Where we are at the moment?



# Commission Q&A

[European Commission's Q&A](#) confirms **UK eligibility** to apply:

*“UK entities including universities, research centres, scientists, innovative businesses, industry, etc. can participate in the first calls for proposals of Horizon Europe as soon as they are published on the European Commission’s website.”*

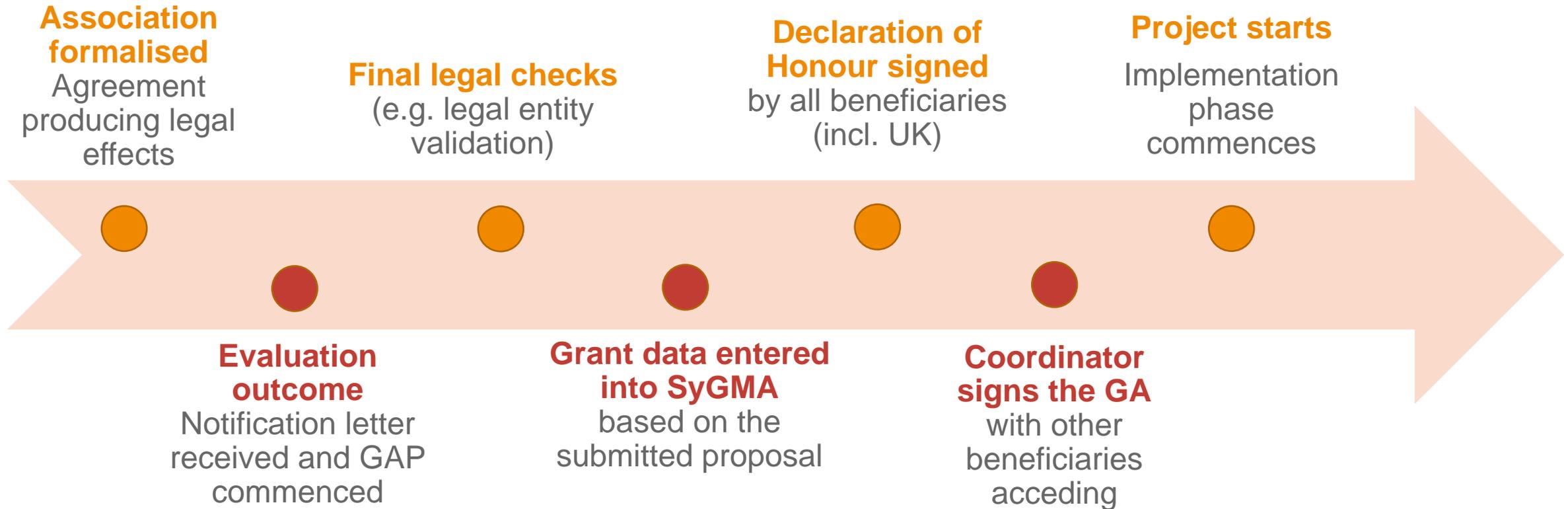
*“...UK applicants are treated as if the UK is an associated country throughout the process, from admissibility and eligibility to evaluation, up until the preparation of grant agreements.”*



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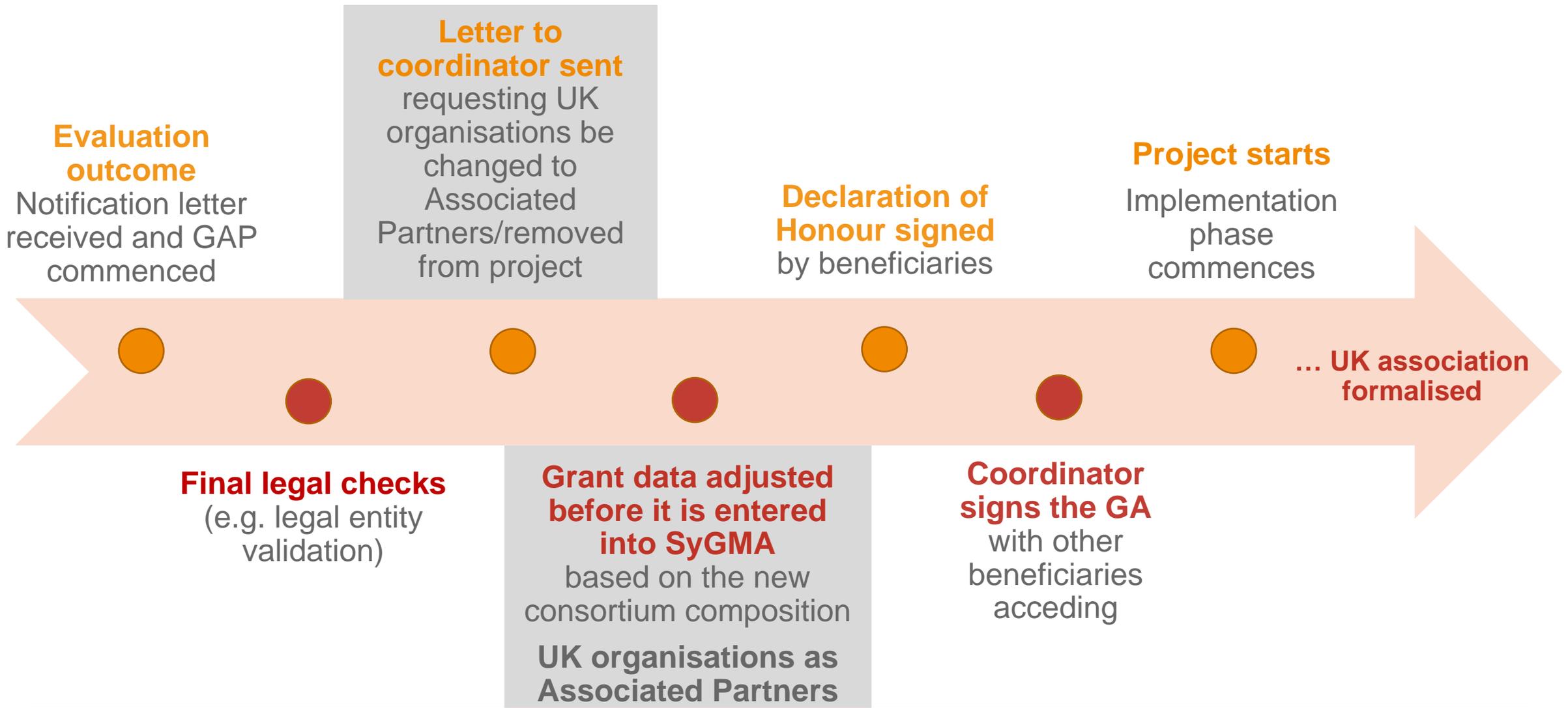


# GAP timeline (WITH association concluded)



GA signature – max. 8 months from call deadline (can be extended in exceptional cases)

# GAP timeline (WITHOUT association concluded)



GA signature – max. 8 months from call deadline (can be extended in exceptional cases)

# IT issues with FTOP

The Funding & Tender Opportunities Portal (FTOP) is still under development, so proposal submission/GAP phase are affected by many technical issues, including:

- International European Research Organisation (IERO)
- Gender Equality Plan (GEP)
- Cost breakdown...

## ▼ Cost Break Down



The participant is established in a non-eligible Country (country potentially to be associated but association not in force) and is requesting a grant amount. Please check whether there is an appropriate justification allowing this exception.

**Thank you for reporting any new messages to UKRO!**

# Letter to the Coordinator (1)

- Can be an official letter from the Head of Unit, or a message from the PO in the FTOP's messaging system:
  - **UK coordinators need to give up this role** (as they do not sign the GA).
  - **Request to change UK organisations to AP without EU funding/to remove UK organisations from the project** (if not becoming AP) → reduction of EU contribution, unless activities of UK organisations taken over by other consortium partners.
  - **Request to address consortium eligibility issues** (if any) after UK partners' switch to AP
    - Adding new partners from eligible countries and rearranging the work/budget, as necessary.

This cannot put into question the initial decision to award the grant.

Failure address eligibility issues by the stated deadline will make the project ineligible and grant preparation will be terminated.

- **ERC grants: UK organisations cannot be host institutions** (until association is completed) → Suggestion to move the grant to another country.

# Letter to the Coordinator (2)

- **Novelty: Possibility for UK organisations to be reinstated as beneficiaries once association is completed:**

*“...the consortium may choose between the following options that may be combined:*

*a) the tasks and budget of the applicant(s) established in the UK are taken over either by the remaining eligible applicant(s) or by one or more additional new applicants established in a MS/AC.*

*(b) the applicant(s) established in the UK may participate as associated partners, in agreement with the rest of the consortium. In this case, the legal entities established in the UK must fund their tasks without Union funding. **The total EU funding to the project will be reduced accordingly**, except for tasks and budget taken over by existing or new eligible applicants.”*

# Letter to the Coordinator (3)

*“The UK entities may be later re-established as beneficiaries/affiliated entities through a grant amendment requested by the consortium if:*

- (i) the instrument of association with the UK [Protocol I] becomes applicable,*
  - (ii) this association agreement provides for its retroactive application prior to the start of the action,*
  - (iii) there is a corresponding financial contribution from the UK to the relevant call.*
- Subject to the fulfilment of these conditions, the granting authority may approve reimbursement of the costs incurred from the beginning of the action.*

*Please note that this is a potential future option and as of today, we cannot foresee whether it will materialize.”*

**Open questions remain about this possibility.**

**UKRI T&Cs foresee UK organisations remaining APs for the entire project.**

# Declaration of Honour

**Continue with the granting process as usual until told otherwise.**

- UK organisations can continue to sign the Declaration of Honour (DoH).
- DoH is confirmation from the beneficiaries that they are not subject to any administrative sanctions that would preclude them from obtaining EU funding and that they will abide by the rules of the programme (set out in the Model Grant Agreement).
- Normally required within 3-6 weeks after commencing the GAP (internal EC rules).
- Will not be taken into account after switching to Associated Partner.

# Associated Partners

Associated partners are **organisations that implement action tasks but without receiving EU funding.**

They **do not sign the GA** but **implement important parts of the project** and are thus often involved actively in the consortium.

Therefore, the **Grant Agreement mentions them and defines their role** (rights and obligations).



# Associated Partners (cont.)

- Associated Partners **must be listed in Article 9.1**, their tasks must be mentioned in Annex 1.
- The financial contribution of Associated Partners to the project is not transferred to the GA, but is indicated in SyGMA (for statistical purposes only).
- **Obligations that must be extended to Associated Partners:**
  - Proper implementation (Article 11)
  - Avoiding conflict of interest (Article 12)
  - Confidentiality and security obligations (Article 13)
  - Ethics (Article 14)
  - Ensuring visibility to EU funding (Article 17.2)
  - Respecting specific rules for the action implementation (see Article 18)
  - Information obligations (Article 19)
  - Record-keeping (see Article 20).

# Associated Partners – Project activities

- According to the EC, technically, **no limit to the extent of R&I activities** that AP can be involved in, but **they must not coordinate projects**.
  - **Important!** Distinction between administrative and scientific coordination:
    - **Admin coordination:** Article 7 of the Grant Agreement lists specific tasks of the coordinator that cannot be performed by anyone else (incl. the beneficiaries): e.g. submitting reports, making payments, etc.
    - **‘Scientific coordination’** is not regulated by the Grant Agreement and can be delegated to participants (incl. APs) with necessary knowledge of the project activities and sufficient resources.

# Associated Partners – Project activities

- **AP can be Work Package leaders**, although there was initially an incorrect message in SyGMA stating otherwise (issue should be resolved by now).
  - Alternative solution proposed by EC – sign the GA without AP as WP leader and process an amendment at a later stage.
- However, some **cost eligibility issues with Financial Support to Third Parties** (cascaded funding):
  - EU contribution is passed on to individuals or organisations (e.g. SMEs) through competitions.
  - EC guidance explains that this cost category is not intended for AP...

# Associated Partners & FSTP

- The Annotated MGA clearly explains which categories of participants may provide financial support to third parties:
  - *“If eligible under the Grant Agreement... **the beneficiaries/affiliated entities may charge costs under ‘Financial support to third parties’** where giving such support is part of the action activities.”*
- Furthermore, the AMGA also confirm that these costs must comply with the general eligibility conditions:
  - *“The costs must comply with the following eligibility conditions:*
    - ***fulfil the general conditions for actual costs to be eligible** (i.e. incurred during the action duration, necessary, linked to the action, etc; see Article 6.1(a))...* → Not possible for payments to be administered by APs, but claimed to the grant by beneficiaries.

# Associated Partners (cont.)

- Need for a **contractual relationship with one (or more) beneficiaries**, or the consortium as a whole.
  - One or more beneficiaries need(s) to be responsible for the AP's activities, incl. technical reporting, etc.
  - **No template provided by the EC**, but can be based on the Consortium Agreement (e.g. new version of [DESCA](#) for Associated Partners – with certain adjustments where necessary).
    - Some contractual obligations from the GA apply to AP.
    - The Associated Partner must be subject to (technical) audits and checks by Court of Auditors, Granting Authority, etc.
    - AP rights concerning the results must be compatible with the beneficiaries' obligations under the GA (e.g. Open Science obligations, etc.)
    - Things like participation in consortium meetings and APs' voting rights up to the consortium to decide.

# Associated Partners (cont.)

- The **change of status is performed by the coordinator/EC Project Officer** responsible for encoding the project data – the process will be explained by the PO and there is also a step-by-step guide in the [Horizon Europe Online Manual](#).

Step	Action	Image
<b>1. Add Associated Partner:</b>		
1.1	Click on <b>Add New Associated Partner</b>	

- The UK organisation is **not required to perform any changes in the system itself**, although it may need to provide some additional information, if requested by the coordinator.
- Likely consequence of the change: **Loss access to project data on the EC Portal.**

# Associated Partners vs Affiliated Entities

- Affiliated entities (former linked third parties in H2020) **must fulfil the same conditions for participation and funding as beneficiaries.**
- Example from AGA:

**Example:** *Company A established in Germany is a beneficiary in a HE grant. A owns B, a French company and also owns C, an US company. B and C may be considered affiliates to A, however only B may participate as affiliated entity to A, because company C is established in a third country that is not eligible. C can participate as associated partner.*

# Special cases

- **Calls with restrictions on participation of organisations based in MS/AC, but controlled by TC/organisations based in TC** – Participation not allowed even as AP, subcontractors, etc. to protect the EU's security, assets and autonomy.
- **Twinning/Teaming projects**
  - Treated in the same way as other collaborative projects.
    - Associated Partners can participate as long as basic eligibility conditions for consortia are met.
    - Need to ensure eligibility of the project by adding another organisation from an eligible MS/AC.
    - **Additional complication:** the project is linked to the profile of and expertise that can be provided by the 'advanced country' partner and the potential new beneficiary (replacing the UK beneficiary) should not put into question the initial decision to award the grant.
- **MSCA projects...**

# What About MSCA?

UKRI Guarantee will provide funding for all eligible successful awardees of MSCA actions

- Awardees will receive **the full value of their funding**
- It will be possible to transfer some of the UKRI funding to cover project wide activities
  - Question 61 of [Guarantee guidance](#)
- **Will follow MSCA eligibility and funding rules** (as much as possible)
  - Including mobility rule, cost related to visas, Immigration surcharge etc, part-time working, project suspensions etc.
- **Family allowance, special needs allowance and the long-term leave allowance**
  - Can be applied at anytime during project implementation (where applicable)
- **Recruited researchers are NOT considered MSCA fellows**



# MSCA Postdoctoral Fellowships

- Mono beneficiary scheme covered by the Horizon Europe guarantee guidance
- The **full value of the unit costs** under “**Contributions for the recruited researcher**” **must be paid** to the researcher by the end of their fellowship
- UKRI funding can be used to cover the costs associated with **secondments, non- academic sector placements, and the outgoing phase of the global fellowship**
- It will be possible to **delay start dates** inline with MSCA rules
- It will be possible to **suspend projects** and or go part time during project implementation
- UK based organisations can host non-UK based MSCA fellows on secondments but **can no longer host** the non-academic sector placements



# Associated Partners in MSCA Doctoral Networks

Associated Partners are expected to be fully integrated into the project and have an integral role in enriching the training experience of a researcher

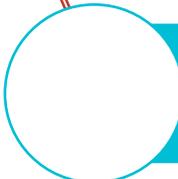
- Can be established anywhere in the world and be from any sector
- Do not sign the Grant Agreement, **but must provide a letter of Commitment**
- Must be included under the appropriate subheadings in part B
- **Cannot be project coordinators**, but can be work package leaders
- **If they have their own funding/external funding they can recruit Doctoral Candidates (DCs)**
  - Do not count towards the overall EU person-month limit per DN and are not considered MSCA fellows
  - Should be included in Table 3.1d Individual Research Projects
- UK partner will contribute to technical reporting
- DC must be recruited on a full employment contract in line with MSCA rules



# MSCA DN - Additional Points to Consider



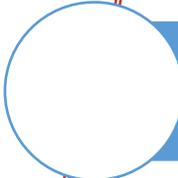
Recruited researchers funded by the EC, must be enrolled in a doctoral programme leading to the award of a doctoral degree in at least one EU Member State or Horizon Europe Associated Country



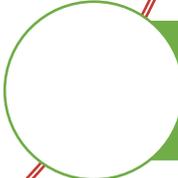
No more than 40% of the EU contribution may be allocated to beneficiaries in the same country



Industrial Doctorates: DC must spend at least 50% of their fellowship duration in the non-academic sector



Joint Doctorate DN: at least three independent legal entities must be entitled to award doctoral degrees and at least two of the institutions involved in conferring a joint, double or multiple doctoral degree must be established in an EU Member State and/or Horizon Europe Associated Country.



The recruited researchers must be enrolled in a doctoral programme leading to the award of a doctoral degree in at least two EU Member State or Horizon Europe Associated Countries.

# Associated Partners in MSCA Staff Exchanges

Third Countries (Associated Partners) are an integral element of Staff Exchanges

- Associated Partners can be established anywhere in the world and be from any sector
  - [Depending on location](#) may be eligible for EC funding
- Do not sign the Grant Agreement, **but must provide a letter of Commitment**
- Must be included under the appropriate subheadings in part B
- **Cannot be project coordinators**, can lead work packages
- UKRI will fund all secondments as encoded in the UK partners budget line:
  - **Secondments from the UK to a beneficiary**
  - **Secondments from the UK to a third country eligible for EC funding**
  - **Secondments from the UK to a third country not eligible for EC funding**
  - **Secondments from third country eligible for EC funding to the UK**
- Standard staff and secondment eligibility rules will apply
- Secondments will not be encoded in Sygma
- UK partner will contribute to technical reporting



# Associated Partners in MSCA COFUND

Associated Partners have an integral role in enriching the training experience of a researcher.

- Associated Partners can be established anywhere in the world and be from any sector
- Do not sign the Grant Agreement, but **must provide a letter of Commitment**
- Must be included under the appropriate subheadings in part B
- **Cannot be project coordinators**, can lead work packages
- Can be added during the lifetime of the project
- If they have their own funding/external funding they can recruit Doctoral Candidates or Postdoctoral Researchers
  - Do not count towards the overall EU person-months and are not considered MSCA fellows
- MSCA eligibility rules for the recruited researchers will apply
- Recruited researchers must be recruited on a full employment contract in line with MSCA rules
- UK partner will contribute to technical reporting





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# Thank you



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