



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS

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**NOTE FOR THE ATTENTION OF THE MEMBERS OF THE COMMITTEE FOR THE
HOME AFFAIRS FUNDS**

Ref.: **HOME-Funds/2025/41**

**Subject: Launch of the call for expression of interest under the Specific Action
“Roll-out of the Secure Information Exchange Network Application -
SIENA” under the Internal Security Fund (ISF) –
Reference: ISF/2026/SA/1.1.2**

1. INTRODUCTION

Regulation (EU) 2021/1149 of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund ⁽¹⁾ provides that Member States may receive funding for specific actions in addition to their initial allocation in their respective programmes.

Specific actions aim to fund transnational or national projects that bring Union added value in accordance with the objectives of the Fund for which one, several or all Member States may receive an additional allocation to their programmes.

They will be implemented as one of the components of the Thematic Facility in line with Article 8 of the above-mentioned Regulation and in accordance with the relevant financing decisions for the work programme 2023-2027 for the ISF Thematic Facility ⁽²⁾.

By the present note, the Commission launches a call for expression of interest under the Specific Action the Specific Action “Roll-out of the Secure Information Exchange Network Application - SIENA”, in line with the actions listed in the above-mentioned Commission financing decisions.

Specific actions will be implemented by Member States participating in the Internal Security Fund via funding received in addition to the allocation under their ISF programmes.

⁽¹⁾ Regulation (EU) 2021/1149 of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund

⁽²⁾ Internal Security Fund (2021-2027) - Migration and Home Affairs

Funding for specific actions is added to the Member States' programme allocations by means of a programme amendment. That additional funding is earmarked for the specific action concerned and shall not be used for other actions in the Member State's programme, except in duly justified circumstances and as approved by the Commission through the amendment of the programme.

Whereas the regular EU co-financing rate under the Member States' programmes will not exceed 75% of the total eligible expenditure, projects implemented under specific actions may benefit from an increased co-financing rate of up to 90% of total eligible expenditure.

The specific action must be implemented by the Member States in accordance with the ISF Regulation and the Common Provisions Regulation (EU) 2021/1060 (CPR) ⁽³⁾. This includes compliance with fundamental rights.

Your attention is in particular drawn to one provision of the CPR. As regards the valued added tax ("VAT") eligibility regime, Article 64(1)(c) of the CPR provides that VAT is not eligible, except:

- (i) "for operations the total cost of which is below EUR 5 000 000 (including VAT);
- (ii) for operations the total cost of which is at least EUR 5 000 000 (including VAT) where it is non-recoverable under national VAT legislation".

2. CALL FOR EXPRESSION OF INTEREST UNDER THE SPECIFIC ACTION

2.1. Background for the specific action

In the context of an increased level of criminal activity within the EU and the emergence of global threats, Member States shall ensure that their law enforcement authorities (LEAs) can exchange criminal information and intelligence with their counterparts across the border with a high level of trust; that such information is swiftly transmitted to the appropriate recipient under all circumstances, that sensitive and personal data are not disclosed unnecessarily or inadvertently, that the information is not ultimately misused by targeted criminal networks, with the direct consequence of undermining the law enforcement actions and that of third parties, notably in the context of hybrid threats, do not exploit the information to destabilise the EU, the Member States, and their respective institutions.

Against this background, the operational deployment of the Secure Information Exchange Network Application (SIENA), managed and developed by Europol ⁽⁴⁾ in accordance with Regulation (EU) 2016/794 and its full rollout to all entities combatting highly mobile and serious criminal networks across the EU, such as customs authorities, drugs enforcement services, and units tasked with combating organised crime, is more necessary than ever. A full-scale deployment, tailored to operational needs, will render

⁽³⁾ Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.

⁽⁴⁾ <https://www.europol.europa.eu/how-we-work/services-support/information-exchange/secure-information-exchange-network-application-siena>

the use of non-EU managed communication channels obsolete, thereby significantly reinforcing the strategic autonomy of the EU in the area of operational law enforcement cooperation.

The Directive (EU) 2023/977 on the exchange of information between law enforcement authorities, responds to such challenges when aiming at improving, facilitating and securing the exchange of information and intelligence, in the area of police cooperation by requiring each country to establish or designate a Single Point of Contact (SPOC) responsible for coordinating and facilitating the exchange of information under this Directive, by establishing common rules for information exchange between law enforcement authorities, and ensuring that Member States' Single Points of Contact are equipped with management tools for exchanging information, i.e. case management system (CMS). SIENA is made mandatory for all transmissions and communications, with only limited exceptions. The SPOC CMS shall be connected and made interoperable by 12 December 2024, whereas the connection to SIENA of the competent law enforcement authorities exchanging under the Directive shall be carried out by 12 June 2027.

This action supports both individual and joint efforts by Member States to assess operational requirements, develop and implement strategic plans, and realise the full operationalisation of the SIENA in support of the exchange of information under Directive (EU) 2023/977. It also facilitates the mutual exchange of expertise among national law enforcement authorities responsible for planning, deploying, and ensuring the operational use of SIENA, notably with regards to its effectiveness and efficiency.

Funding provided through the Specific Action “Roll out of SIENA” is complementary with actions that Member States could finance under their ISF programmes in accordance with the ISF basic act, aimed at national activities needed to implement the new obligations in accordance with the Directive on information exchange.

2.2. Indicative budget available

The indicative amount envisaged for this “Specific Action SIENA” (ISF/2026/SA/1.1.2) is **EUR 12 225 000**, subject to an amendment to the ISF Thematic Facility financing decision mentioned in Section 1 above ⁽⁵⁾.

To ensure equal and fair treatment between Member States, **the maximum amount to be allocated to each Member State is indicated in Annex 1 to this note.**

Ensuring the full roll out of SIENA in application of the Directive on information exchange builds on two kinds of input from national LEAs, which thus define the two strands of the allocation per Member State:

- (a) a fixed amount of EUR 150 000 shall be allocated to each Member State (amounting in total to EUR 3 900 000) to cover input at national level, which are independent of the number of police officers in each Member State's LEAs and relate i.a. to the design and adaptation of the interconnection of the national CMS and other national IT systems, and

⁽⁵⁾ The amendment aims to ensure sufficient funding for shared management in the ISF Thematic Facility work programme. The indicative budget of this call will have to be revised downwards if the amendment is not adopted as planned.

- (b) a variable amount per Member State (to cover i.a. the deployment to end users of the SIENA applications) calculated from the remaining total of EUR 8 325 000 according to the number of police officers in each Member State's LEAs based on the 2020 EUROSTAT database ⁽⁶⁾ and an amount of EUR 5,535835642 per police officer.

The requested amount, i.e. Union contribution to the Member State's ISF programme (including Technical Assistance 6%) should not be higher per application than the amount in column 3 (sum of columns 1 and 2) of Annex 1.

2.3. Scope and purpose of the specific action

The objective of this specific action is to support Member States participating in the ISF in implementing at national level the activities that fall under Articles 13, 15(3)(a) and 16(1)(f) of the Directive on information exchange.

The specific action proposed **can include** the following activities:

- Setting up, adapting and maintaining ICT systems that contribute to the implementation of the Directive on information exchange, namely but not exclusively:
 - o the connection of each Member State's national Single Point of Contact (SPOC as the central entity responsible for coordinating and facilitating the exchange of information) to SIENA by insuring the interoperability of its Case Management Systems (CMS) with SIENA;
 - o the material extension of the scope of the information exchanged under the Directive to those necessitating classified levels – starting from EU RESTRICTED and above, notably with regards to sensitive to highly sensitive material and intelligence linked to hybrid threats (including the use of SIENA RESTRICTED web services);
 - o the effective roll out of SIENA as the EU default communication channel to all competent law enforcement authorities involved in cross-border criminal information exchange, particularly first line officers and mobile field units combatting serious and organised crime, as well as all relevant personnel assigned to, or operating under, the SPOC structure.
- Training on the use of such systems,
- Testing and improving the interoperability components and data quality of such systems,
- Hardware (**NB:** within the limit of the 35% threshold for equipment, means of transport and security-relevant facilities as stipulated in Article 13(7) of ISF Regulation),
- Cost of staff involved in the activities that are supported by the Fund or activities requiring involvement of staff for technical or security-related reasons.

⁽⁶⁾ The EUROSTAT database on the number of police officers per Member State in 2020, as last updated by all 26 Member States, is available in sheet 3 of the download version of [crim_just_job] Personnel in the criminal justice system by sex and in Annex 1.

Besides the ineligible activities listed in Article 5(5) of the ISF Regulation, the specific action should not finance activities related to:

- Meetings, conferences, workshops and events.
- Activities with and in third countries.

Member States should also indicate in their application form under which output and result indicators (see Annex 2) their project will fall.

2.4. Expected results

As part of the roll out of SIENA by Member States by 12 June 2027, the expected results would be:

- Member States' Single Points of Contact and all their competent law enforcement authorities potentially involved in the exchange of information under the Directive on information exchange are directly connected to SIENA, including, where appropriate, through mobile devices,
- Member States' Single Points of Contact and all their competent law enforcement authorities use SIENA to send requests for information, provide information pursuant to such requests or provide information on their own initiative under Chapter II or III or under Article 12 of the said Directive,
- The interoperability of the national Case Management System with SIENA, ensuring, in particular, that incoming communications through SIENA can be directly recorded in, and that outgoing communications through SIENA can be directly sent from, the case management system.
- The staff of Member States' Single Points of Contact and all competent law enforcement authorities is provided with access to adequate and regular training on the use of SIENA.

The specific action proposed should not start before 12 June 2024 and should ideally be completed by 12 June 2027 at the latest.

2.5. Target audience for the specific action

All 26 Member States which are participating in the Internal Security Fund.

3. PROCEDURE FOR APPLICATION

3.1. Admissibility and assessment aspects

To be considered admissible a proposal must:

1. be submitted by a Member State identified in Annex 1 to this call and consist of only one proposal per Member State,
2. be submitted within the deadline (see below) to the ISF specific actions functional mailbox HOME-ISF-SPECIFIC-ACTIONS@ec.europa.eu,

3. consist of the official ISF/2026/SA/1.1.2 Application form attached to this Note, together with the Budget form, which must be readable and complete (all fields necessary for assessment are filled in),
4. be submitted by the Managing Authority on behalf of the entity in the Member State that will be responsible for the implementation of the specific action,
5. identify a project beneficiary (an entity) that will be responsible for the implementation of the specific action in the Member State.

As regards the assessment phase, DG HOME will allocate an amount to each admissible application, the activities of which are assessed as falling within the purpose and the scope of this specific action. The maximum amount allocated per Member State is indicated in Annex 1. Member States may request less.

In the simplified application form for this specific action, a Member State should confirm its intention to participate in the specific action, indicate the scope and the nature of the activities that it aims to implement under the specific action, confirm that it will use the allocated amount solely for the specific action's intended purpose and describe how the activities will complement other funding available under their ISF programme 2021-2027.

Member States are encouraged to explain the financial envelope proposed and ensure coherence between the amounts for the activities and the needs identified at national level.

Member States must ensure respect for the horizontal principles described in Article 9 of Regulation (EU) 2021/1060, including respect for fundamental rights and compliance with the Charter of Fundamental Rights of the European Union, as well as Regulation (EU) 2016/679 and Directive (EU) 2016/680 ⁽⁷⁾.

Moreover, Member States must also ensure that the envisaged actions are not affected by a reasoned opinion delivered by the Commission in respect of infringement proceedings under Article 258 of the Treaty on the Functioning of the European Union (TFEU) that put in doubt the legality and regularity of expenditure or the performance of the actions (Article 8(5) of Regulation (EU) 2021/1149).

3.2. Application procedure

Deadline for the application: Member States are invited to submit their proposals by **30 January 2026** at the latest, using the official ISF/2026/SA/1.1.2 Application form attached to this Note and its budget form. Proposals can be submitted in any official EU language (project summary should however always be in English). For reasons of efficiency, it is strongly advised to use English for the entire proposal.

⁽⁷⁾ Directive (EU) 2016/680 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA. Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and the free movement of such data.

In line with the Regulation (EC) No 1049/2001⁽⁸⁾, any document held by the Commission, including documents containing sensitive information, may be subject to a request for public access.

To ensure equal and fair treatment of the proposals and allow the Commission to allocate at the same date all the available funding, DG HOME will assess all proposals simultaneously. Therefore, proposals submitted after the deadline will not be admissible.

The Members of the Committee for the Home Affairs Funds will be informed at the latest 10 working days before the deadline for the submission of the proposals in case the deadline for the submission of proposals is extended.

E-mail address for the application: The proposals should be submitted to the ISF specific actions functional mailbox HOME-ISF-SPECIFIC-ACTIONS@ec.europa.eu. Member States may submit additional documentation if necessary.

No modification to the application is allowed once the deadline for submission has elapsed. However, if there is a need to clarify certain aspects or to correct clerical mistakes, the Commission may contact the applicant/ lead Member State during the evaluation process. A reply should be provided by the Member State within 3 working days from the request date.

Any requests for clarification by the Member States on this call may be sent by 7 January 2025 at the latest, to the ISF specific actions functional mailbox HOME-ISF-SPECIFIC-ACTIONS@ec.europa.eu.

Requests for clarifications should be sent **ONLY by the Managing Authority**. The Managing Authority has an important role to play in explaining to potential beneficiaries the applicable rules and specificities of the ISF programme and the Specific Actions scheme, as well as helping them to prepare their applications. The Managing Authority should be their sole contact point and has the responsibility to review and reply to any questions received from applicants. It may, however, address these questions to the Commission services if further clarification is needed. As projects under specific actions are managed at national level, according to national rules, specific questions on eligibility of costs should be addressed first to the Managing Authority.

To respect the principles of equal treatment and transparency, the replies to the written requests for clarification received will be sent to all Member States, via HOME-AFFAIRS-FUNDS-COMMITTEE@ec.europa.eu.

DG HOME will inform Member States of the outcome of this call for expression of interest under the Specific Action **by end February 2026**.

4. AMENDMENT OF THE ISF PROGRAMMES AND ELIGIBILITY OF EXPENDITURE

After having been informed of the outcome of this call for expression of interest under the Specific Action, each Member State should submit to the Commission a request to

⁽⁸⁾ 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.

amend its ISF programme, via SFC. The amended programme should include a short description of the specific action, adjust the output and result indicators, and include the costs and codes linked to this specific action (respectively in the description and under tables 1, 2 and 3 of Specific Objective 1, and table 6 of the programme). When amending an ISF programme of a Member State, two situations may arise regarding the eligibility of expenditure ⁽⁹⁾:

1. For Member States that have included all the types of interventions listed in Annex VI table 2 of the ISF regulation that are relevant to the “Specific Action SIENA” ISF/2026/SA/1.1.2 in table 2.1.3 of Specific Objective 1 in their *initially approved* ISF programme: expenditure for the “Specific Action SIENA” will be eligible as of 12/06/2024.

2. For Member States that have *not* included all the types of interventions listed in Annex VI table 2 of the ISF regulation that are relevant to the “Specific Action SIENA” ISF/2026/SA/1.1.2 in table 2.1.3 of Specific Objective 1 in their *initially approved* ISF programme: expenditure for the “Specific Action SIENA” will be eligible from the date of the submission by the Member State of its request for the amendment of the ISF programme that will add the respective types of interventions in the programme.

Yours faithfully,

Silvia MICHELINI

Enclosure: Annex 1 (allocations), Annex 2 (indicators), Application package (application and budget forms)

(⁹) Art. 63(7) of Regulation (EU) 2021/1060.