

Digital Transformation Scheme:

Round 1 Guide for Applicants

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Contents

1.	Introduction	3
2.	Objectives	3
3.	DTS Funding	4
4.	Procedures for Making an Application	4
4.2 F 4.3 A 4.4 A 4.5 C 4.6 C 4.7 F 4.8 C 4.9 C 4.10 Gene De M	Submitting an Application Registration Application Checklist Accuracy of Information Closing Date Confidential Material Freedom of Information Data Protection Conflicts of Interest State Aid Funding eral Block Exemption Regulation (GBER): Minimis Aid Children First Act	2 2 2 3 5 5 6 6
5.	Assessment Procedure	8
5.2 F	Preliminary Assessment Preliminary Assessment Qualitative Assessment Strategic Assessment Commissioner Ratification The Decision-making Process Funding Decisions Contracting Disclaimer	8 11 11 12 12 13 13
Арре	endix 1 – State Aid Exemptions under GBER	15
Арре	endix 2 – Definition of SMEs	19
Prelii Qual Strat	endix 3 – Assessment Scoring Matrices iminary Assessment Scoring Matrix litative Assessment Scoring Matrix tegic Assessment Scoring Matrix	20 20 20 21
Appe	endix 4 – Digital Accessibility and Al Guidance	22



1. Introduction

Coimisiún na Meán ("An Coimisiún"), Ireland's commission for regulating broadcasters and online media and supporting media development. It is responsible for operating various funding schemes including the Digital Transformation Scheme (DTS).

The Digital Transformation Scheme (DTS) is a funding scheme which aims to support Public Service Content Providers (PSCP's) transition to a sustainable digital model thereby ensuring the long-term viability of independent, trustworthy, accessible and diverse high-quality public service content.

It is designed to provide support for media providers to accelerate the digital upskilling of their existing workforce with the requisite training to thrive and compete in the national and global digital media sector whilst also funding the essential modernisation of infrastructure and digital tools for business development.

2. Objectives

The broad aims of the DTS are:

- Support Sector Training Needs: Address identified digital capability and skill gaps by equipping
 media professionals with future-ready digital first skills through targeted training and reskilling.
- Support Sector Technology Needs: Support the modernisation of media infrastructure and use of
 innovative tools to adapt to the digital landscape and meet the needs of media consumers and assist
 the financial sustainability of the media sector.
- **Prominence:** Increase level of prominence and 'findability' of public service content through digital transformation measures thereby assisting audiences in accessing trustworthy, reliable and accurate information.
- **Irish Language:** Support the digital transformation of Irish language Public Service Content Providers.
- **Plurality:** Encourage and increase digital capability and activity across a diverse range of sources thereby promoting a resilient and representative media landscape in Ireland.
- **Use of New Technology:** Enable equitable adoption and ethical utilisation of productivity-enhancing tools, including AI, that serve to enhance accessibility, efficiency and engagement while preserving editorial integrity with human oversight and safeguarding media sector employment. (e.g. analysing and personalising audience engagement, transcription, subtitling, assistive social media monitoring, sifting large datasets)
- Accessibility: Support digital accessibility training and enhance technology to incorporate features such as transcription, text-to-speech and Irish Sign Language (ISL) interpretation to advance accessibility.
- Youth Engagement: Support the development of innovative and sustainable digital approaches to engage diverse and younger audiences, meeting youth where they are, across the platforms, channels and formats they actively use.
- **Collaboration:** Foster greater collaboration and leverage economies of scale in the development and implementation of new training and technologies.
- Sustainability: Encourage digital solutions with low environmental impact and long-term viability. Incorporate best green practices in digital content delivery (e.g. renewable energy usage, sustainable streaming, green server hosting, reduced data centre usage.)



3. DTS Funding

An Coimisiún has allocated €3 million of the €10m allocated for Media Funding Schemes in 2025 to the Digital Transformation Scheme (DTS). This funding covers the grants and the administration costs of the Scheme.

4. Procedures for Making an Application

4.1 Submitting an Application

All applications must be made via the online form at cnam.submit.com by 12 noon on the closing date for the funding round, unless otherwise stated. Applications can only be submitted when a funding round is open. Each funding round will be open for a minimum of four weeks prior to the published closing date. Incomplete applications will be disqualified. An Coimisiún's decision in this regard will be final.

4.2 Registration

Media service providers must be registered as an Applicant on cnam.submit.com. If you are unsure how to submit an application, please contact An Coimisiún at digital@cnam.ie for information and assistance.

4.3 Application Checklist

To make an application for funding, you must answer 'yes' to the following 12 questions:

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Т	I have read the Digital Transformation Scheme and the DTS Guide for Applicants – DTS Round 1.	Y/N
2	I have registered on the online platform as an applicant and the media provider/s is / are also	Y/N
	registered as a provider on cnam.submit.com.	
3	I will complete the online application form and will ensure that all third-party confirmations are	Y/N
	included within the application. Any material considered confidential will be marked and the rationale	
	for seeking confidentiality clearly set out.	
4	I and the applicant team have the current capability and full capacity to deliver the project as set out	Y/N
	from beginning to completion.	
5	My application is focused on Digital Transformation as defined by the Scheme.	Y/N
6	My project is not already funded by another public fund.	Y/N
7	I meet all the eligibility requirements as outlined in the Scheme.	Y/N
8	My project directly supports the Scheme's objective(s).	Y/N
9	The Applicant is a regulated entity and the funded project will be subject to the relevant codes and	Y/N
	standards of a recognised EU media regulator such as An Coimisiún or the Press Council of Ireland.	
10	I will provide a Digital Transformation project plan and detail how it forms part of future business	Y/N
	activities.	
11	The proposed project is ready to go.	Y/N
12	Any personal information included with the application is necessary.	Y/N
The a	answer to all the above questions should be 'yes'. When you are satisfied 1 – 12 are complete, you are	ready to submit
	application via cnam.submit.com	,
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4.4 Accuracy of Information

All information submitted as part of an application for funding must be true and correct.

4.5 Closing Date

The application and relevant attachments must be submitted via cnam.submit.com by **5pm on Friday, October 24, 2025**.



4.6 Confidential Material

Information which an applicant considers to be confidential should be highlighted and marked as 'Confidential Material'. An Coimisiún will ensure that such information is appropriately handled including on completion of the application process.

4.7 Freedom of Information

An Coimisiún undertakes to use its best endeavours to hold confidential any material provided in response to this process, subject to An Coimisiún's obligations under law, including the Freedom of Information Act 2014 ("FOI Act"). Applicants and grantees are asked to consider if any of the information supplied to An Coimisiún in an application or during subsequent contracting should **not** be disclosed because of its sensitive content, to identify this content and to specify the reasons for its sensitivity. An Coimisiún will consult with applicants about confidential, personal or commercially sensitive information before making a decision on any request received under the FOI Act. Such information may be released in response to an FOI request.

4.8 Data Protection

In order to operate this funding round effectively, we will require information about the applicant and detailed information on the proposed content. This data and documentation may include personal information such as job titles, salaries and e-mail addresses.

An Coimisiún shall comply with its obligations under the General Data Protection Regulation Directive, the Data Protection Act 2018 and any other applicable data privacy laws and regulations when handling and processing any such personal information submitted to this funding initiative. The information submitted in an application, including any personal information, will be used to process the application and to liaise with the applicant.

Any personal information submitted (excluding the Contractor's contact details used for the purposes of the round) will only be retained if the application is successful. Such information would be required for the funding contract and subsequent measuring of the performance of the grant and the associated outcomes. The information may also be used for the purpose of reviewing the scheme and by external researchers. In such instances all personal information would be anonymised.

An Coimisiún is obligated and committed to protecting all personal data submitted in response to a call for applications to this funding round. An Coimisiún has an appointed Data Protection Officer who is registered with the Data Protection Commission. You can find out more on how An Coimisiún processes personal information and An Coimisiún's terms and conditions at: Data protection & privacy - Coimisiún na Meán

4.9 Conflicts of Interest

An Coimisiún must comply with the Ethics in Public Office Act (1995) and the Standards in Public Office Act (2001). In this regard if, as an applicant, you become aware of circumstances which might give rise to a conflict of interest in the context of your application, you must promptly bring such circumstances to the attention of An Coimisiún.



4.10 State Aid Funding

The Digital Transformation Scheme (DTS) is operating under both the <u>General Block Exemption Regulation</u> (Commission Regulation (EU) No. 651/2014) (the "GBER"), as amended, and the <u>De Minimis Regulation</u> (Commission Regulation (EU) 2023/2831) ("**De Minimis**"), as amended. DTS grants will be awarded pursuant to the GBER or pursuant to De Minimis.

General Block Exemption Regulation (GBER):

Overview

The GBER is an EU measure that exempts Member States from the obligation to notify and seek EU Commission approval before funding is granted, once all of the relevant GBER criteria are satisfied. There are a number of categories of State aid declared in the GBER as being compatible with the internal market and, therefore, exempt from the requirement for prior notification and approval by the European Commission. An Coimisiún has identified certain exemptions within the GBER as being relevant to the projects eligible for funding under the DTS. The relevance of the GBER is that the rules contained therein will help determine the appropriate level, including maximum amount, of funding available in respect of projects that will be awarded DTS funding.

Categories of Aid

The following categories of GBER aid may be supported under the DTS. A detailed description of the eligible activities that can be supported under these GBER categories and the maximum amounts permitted to be paid under such categories are set out in Appendix 1:

-	
	Article 17: Investment Aid to SMEs
	Article 18: Aid for Consultancy in favour SMEs
	Article 25: Aid for Research and Development Projects
	Article 28: Innovation Aid for SMEs
	Article 29: Aid for process and organisational innovation
	Article 31: Training Aid

Type of Undertaking Applying for Funding

Applicants seeking support under GBER will be required to declare the size of their organisation - specifying whether it qualifies as a small or medium-sized enterprise or as a large enterprise in accordance with the EU definition of enterprise size. See Appendix 2.

Maximum Percentage of Funding Available

In general, An Coimisiún will allocate grants under the Scheme that represent between 50-70% of the eligible costs, the amounts of such grants which will be subject to the limitations regarding what is permitted to be paid under GBER and under De Minimis, as applicable.

Applicants are required to provide full details regarding the level and source of any other funding for all aspects of the budget.



The following matrices provide an example of the possible percentages to be allocated:

Grant Category (Refer to Grant Types in the scheme Document)	Minimum Grant	Maximum Grant	Grant awarded will not represent more than the following percentage of the total budget
Digital Infrastructure	€10,000	€350,000	50%
Digital Skills	€5,000	€300,000	Up to 70%
Development/Training			
Digi Partnership &	€20,000	€250,000	50%
Collaboration			
Accessibility &	€5,000	€250,000	50%
Inclusion Projects			
Digital Media	€5,000	€200,000	50%
Consultancy			
Digital Content Innovation	€10,000	€200,000	50%

Incentive Effect

DTS funding allocated pursuant to GBER shall apply only to aid which has an incentive effect. Aid shall be considered to have an incentive effect if the beneficiary has submitted a written application for the aid to An Coimisiún before work on the project starts.

De Minimis Aid

Under De Minimis, the current ceiling for all De Minimis aid, regardless of the source of such De Minimis aid, awarded to any single undertaking by any State agency or public body over a three-year period is €300,000. De Minimis aid of up to €300,000 per undertaking over any period of three years is allowed by the European Commission under the De Minimis Regulation as this is considered to be at a level which will not have a substantive effect on trade between Member States nor distort or threaten to distort competition and therefore can be awarded without notification to or clearance by the European Commission.

Applicants must declare to An Coimisiún any De Minimis aid received by them from any public body in the three years before funding is received from An Coimisiún (and any "in progress" applications for state funding). All projects will be checked for De Minimis applicability as part of the initial application and on submission of claims, and this may result in applications being ineligible for grant aid under this Scheme.

Applicants seeking support under the De Minimis Regulation will be required to submit a declaration to An Coimisiún declaring all De Minimis aid received over the past three years, in accordance with EU State Aid Rules. It should be noted that a false declaration resulting in the threshold of €300,000 being exceeded could later give rise to the aid being recovered by An Coimisiún with interest.

Cumulation

Where aid is granted to beneficiaries under the DTS through a mix of GBER and De Minimis funding and such funding is for the same identifiable eligible costs, such cumulation shall only by be permitted and provided by An Coimisiún insofar as the GBER aid intensities for the relevant aid/eligible costs in question are respected.



Monitoring & Reporting Requirements

An Coimisiún will retain records with information and supporting documents to establish that all the conditions laid down in the GBER and in De Minimis are fulfilled for 10 years from the date of the last award of aid under the DTS fund.

4.11 Children First Act

As a public body, An Coimisiún has obligations under the Children First Act (2015). Where An Coimisiún is funding a project or activity which involves children or vulnerable adults, both an Coimisiún and the grantee are obliged to comply with the provisions of the Act. If one or more of your proposed activities involve children or vulnerable adults, this should be indicated in the application form. Please note that as a condition of funding you will be asked to provide a copy of your Child Protection Policy/Vulnerable Adult Protection Policy and to provide assurances that your project is operating in compliance with the Children First Act. A National Guidance document in relation to Children First can be found here.

5. Assessment Procedure

There are four stages in the assessment process and each stage involves the assessment of an application against predetermined criteria which are underpinned by the report of the Future of Media Commission (FoMC), the Broadcasting Act 2009, as amended, and the objectives of An Coimisiún. The assessment and decision phases are:

- Qualification (Preliminary Assessment)
- Qualitative Assessment
- Strategic Assessment
- Commissioner Ratification

For the guidance of applicants, An Coimisiún sets out below how the procedures for each of the stages will be applied in assessing applications.

5.1 Preliminary Assessment

Applications must meet a number of minimum criteria to be considered for funding. Applicants to the Scheme must be eligible to apply, and the application must be for Digital Transformation projects that are permitted by the Scheme.

In this context, Digital Transformation will encompass the adoption of digital upskilling, technologies and workflows to modernise the creation and distribution of trustworthy, high quality inclusive and accessible Public Service Media Content thereby maximising audience reach.

Further guidance on these criteria is set out below and the Preliminary Evaluation Scoring Matrix is set out at Appendix 3 for information and reference. If any of these minimum criteria are not met, applications will be disqualified. An Coimisiún's decision in this regard will be final.



5.1.1 Who can apply for funding?

Applications to the Digital Transformation Scheme may be submitted by media service providers on a platform neutral basis. The eligibility criteria set the minimum standards which must be achieved to be eligible to apply for funding.

- **Compliance:** Broadcast media will be required to demonstrate a track record of compliance with Coimisiún na Meán broadcasting codes and standards.
- Membership of a Regulatory Body: Newspapers and online publications must provide evidence of both a membership of a relevant self-regulatory body i.e. the Press Council of Ireland, and a track record of compliance with same.
- Public Service Content Producer: Applicants must be entities that produce and distribute public service content, such as news, culture, and community-focused programming. This includes broadcasters, newspapers, and online platforms.
- **Digital Transformation Commitment:** An Coimisiún will expect applicants to provide a Digital Transformation project plan and detail how it forms part of future business activities.
- **Demonstration of Need:** Applicants must demonstrate a clear need for digital transformation, outlining how the funding will enhance their ability to deliver public service content to audiences more effectively and efficiently.
- Meet Scheme Objectives: Applicants must clearly demonstrate the Scheme objective(s) to which their proposal aligns.

5.1.2 What can the Scheme fund?

Round 1 Funding is available to support applications for Digital Transformation Projects.

- **Skills Development and Training Grants:** Reskill and upskill the media sector, address skills gaps in areas such as but not limited to, digital journalism and ethics, digital accessibility, curation, preservation, audience engagement, AI, data analytics/Search Engine Optimisation (SEO) and multiplatform storytelling. See Appendix 4.
- **Digital Infrastructure Grants:** Implement, or make significant upgrades to, essential business and IT infrastructure to better serve audiences (In areas such as but not limited to CMS, servers, cloud services, apps, AI tools).
- Partnership and Collaboration Grants: Foster greater collaboration and leverage economies of scale in the development and implementation of digital transformation projects in areas such as but not limited to training and technology.
- Accessibility and Inclusion Grants: Support digital accessibility training and enhance technology to incorporate features such as transcription, text-to-speech and Irish Sign Language (ISL) interpretation to advance accessibility. See Appendix 4.
- **Digital Consultancy Grants:** Support the media sector with strategic digital transformation challenges and opportunities and help organisations to identify and introduce best practice digital training, technologies & solutions to optimise content prominence.
- **Digital Innovation Grants:** Support the delivery of new digital-first or multimedia public service content and encourage novel approaches to engage with changing media consumer preferences.



5.1.3 What are Eligible Costs?

Funding supports for Digital Transformation Scheme: Eligible Costs

Digital Upskilling/Reskilling

Training: Reskilling and upskilling the media sector in areas including but not limited to digital journalism and ethics, digital accessibility, curation, preservation, audience engagement, AI, data analytics and multi-platform storytelling.

Digital Transformation Consultancy

Consultancy Service/Advisory for organisational Digital Transformation.

Software and Digital Tools

> CMS, Digital Asset Management Systems. Podcasting/Streaming Platforms. Editing/Scheduling Software. Licencing of Cloud/SaaS tools (software as a service).

Project Equipment

Digital Production/Broadcasting/AV Equipment. Essential Computers/Servers/Networking Gear. New Studio Upgrade/ Digitisation Kits. DAB transmission Hardware.

Website Platform/Player Development

Creation/Innovative Upgrade of Websites/Players incorporating new technology. SEO optimisation, mobile responsiveness, analytics integration. Multilingual Support/Accessibility Features

Audience Engagement

➤ Use of CRM tools to segment and Target Audiences. Social Media Automation Tools. Analytics Software (Data driven system for targeted content distribution)

Al & Automation for Content and Operations

Al tools driving transcription, captioning, voice over tools. Automation of Publishing workflows

Equipment purchased under this funding Scheme must be procured in accordance with standard business procurement practices, ensuring transparency, value for money and compliance with applicable public procurement regulations. Applicants should ensure all proposed expenditures are eligible under the scheme guidelines and that the total project cost represents good value for money.

Proposals should provide a rationale for all costs in their budget notes/detailed budget breakdown. Applicants must provide detailed budget notes relating to all costs in the budget submitted with their application. These budget notes will be taken into account during the qualitative assessment phase and the more detail that is provided, the more useful it will be to assessors. Eligible costs may also include financial costs including the M45 grant claim report required for all public-sector grant monies.



5.1.4 What are Ineligible Costs?

Funding will not be available to finance:

- Projects that do not have a clear digital transformation component.
- Direct production of content.
- > Routine or business as usual upgrades of digital systems already in use.
- Paid-for software trials with technology vendors. Assessments from technology platform or software providers, external digital experts must be solution agnostic.
- Consultancy, training and other activity unrelated to digital transformation and to the objectives of the scheme.
- Projects where the objective is to develop or upgrade systems for the monetisation of content (e.g. paywalls, subscription systems, advertising technology).
- > Funding for creating permanent positions for Digital Transformation.
- > Projects solely aimed at achieving environmental/sustainability outcomes.

5.2 Preliminary Assessment

Applications must meet a number of minimum criteria to be considered for funding. Applicants to the scheme must be eligible to apply, and the application must be for projects of work and the associated permitted costs.

Further guidance on these criteria is set out below and the Preliminary Assessment Scoring Matrix is set out at Appendix 3 for information and reference. If any of these minimum criteria is not met, applications will be disqualified. An Coimisiún's decision in this regard will be final.

5.3 Qualitative Assessment

If the applicant and application are deemed eligible following the Preliminary Evaluation Assessment , the application qualifies for consideration for the award of funding. The next stage is the Qualitative Assessment, during which each application is assessed on its own merits, against predetermined qualitative criteria, which are embedded in the objectives of the Digital Transformation Scheme (DTS). The Qualitative Assessment Scoring Matrix is set out in Appendix 3 for information and reference.

We will assess how the application will align with the overall aims and objectives of Digital Transformation Scheme. Whether the applicant demonstrates a clear need for digital transformation including goals, activities, timelines and results outlining how funding support will enhance their ability to deliver public service content to audiences more effectively and efficiently. The assessment will consider whether the expected project outcomes are made clear and are realistic and whether the proposal has clearly shown 'incentive effect' i.e. that this project could not proceed in the same way without funding? Proposals will be assessed for demonstrating innovation and encouraging plurality while increasing digital capability and activity across a diverse range of platforms meeting audiences on the platforms where they are.

There are 3 mandatory criteria. An applicant must achieve a score of 50% or more in each mandatory criterion to qualify for further assessment for the award of funding. The mandatory assessment criteria are as follows:

- Digital Transformation Impact, Incentive Effect and Quality of Application.
- Feasibility, Resources & Case Made for Funding.
- Innovation and Public Value.



5.4 Strategic Assessment

In instances where there are more qualifying applications than funds available, An Coimisiún will have a further assessment phase. This will focus on the quality of individual applications and the overall package of funding awards that best fulfils the aims of the Scheme collectively. A final package of recommendations is then submitted to the Commissioners for consideration and ratification. The Strategic Assessment Scoring Matrix is set out in Appendix 3. The assessment criteria for this phase are:

- Digital Transformation Need, Relevance and Timelines
- Potential for Sectoral Impact
- Advancing Digital Accessibility
- Recommendations from the Qualitative Assessment Panels
- Audiences Engagement
- Digital Sustainability
- Irish Language

5.5 Commissioner Ratification

The final stage involves the Commissioners' consideration of the package of recommendations emerging from the previous assessment phases. Following ratification, each applicant is notified by e-mail of the funding decision pertaining to their application.

5.6 The Decision-making Process

The following procedures will be followed by An Coimisiún in determining the suitability of an applicant for the award of funding:

5.6.1 An initial evaluation will be made of each application to ensure that it meets the qualifying criteria of the Scheme, including applicant eligibility, and that all the information and documentation required have been submitted. Any applicant who does not meet any one of the listed criteria will be disqualified and will be excluded from the application process (refer to Appendix 1). An Coimisiún staff will check for any potential conflicts of interest with the assessors prior to distributing any applications to the next stage of assessment.

5.6.2 The eligible applications are then arranged in groups and assigned to a Qualitative Assessment Panel. For information, for Round 1 funding applications, the groupings may be informed by proposal type, format, amount requested and so forth.

The Panel could be made up of An Coimisiún staff or of An Coimisiún staff and external assessors, and in the formation of each panel, An Coimisiún will take into account the appropriate skills and experience required to assess the projects. Each panel member assesses each application independently and then a meeting is convened to discuss each application. The panel will agree on a score for each application, and a list of the funding recommendations will be agreed upon. An Coimisiún will then circulate a draft of the matters agreed upon to each panel member for consideration and approval. On completion of all the panel assessment meetings, including signoff on the assessment meeting documentation, the complete list of funding recommendations is compiled. A funding award will be granted to the strongest application, as agreed by the panel.

5.6.3 A Strategic Assessment Panel is established of senior members of An Coimisiún management and staff members involved in the running of the Scheme round. This forum considers collectively the Qualitative Assessment Phase scores, the Panel recommendations and the strategic criteria.



An Coimisiún is obligated to aim for a balance of outcomes that facilitates the best overall mix of Digital Transformation Projects based on the applications received for the round. For the Round 1 funding, the applications that best fulfil the objectives of the funding round and scheme and accordingly achieve the highest scores will be awarded funding.

5.6.4 The final stage sees the Commissioners make the final decisions on the applications, considering the recommendations emerging from the previous assessment phases.

5.7 Funding Decisions

Successful applications

Where An Coimisiún has approved an application for funding, the following steps apply:

- i. A Coimisiún will inform the applicant of the decision, setting out any condition(s) attached to the funding offer.
- ii. An Coimisiún will make public a list of the funding offers ratified by the Commissioners.
- iii. The successful applicant must confirm acceptance of the offer of funding and any condition(s) stipulated by An Coimisiún.
- iv. A successful applicant is required to enter into a contractual agreement with An Coimisiún, on terms to be specified by An Coimisiún. Such terms include the provision of contract deliverables by the successful applicant, and a schedule relating to the drawdown of funds by an applicant. Funds are administered by An Coimisiún in accordance with the terms of the contractual agreement.

Unsuccessful applications

Where An Coimisiún has rejected an application for funding, applicants are notified individually and provided with information on the performance of their application in the assessment process. The notification of the funding decision to the applicant will indicate at what stage the application was rejected:

- If the application is rejected during the Qualification Assessment, the notification will indicate 'Rejected - Preliminary'.
- If an application is rejected during the Qualitative Assessment, the notification will indicate it as 'Rejected Stage 1' when the Round has been ratified.
- If an application is rejected during the Strategic Assessment, the notification status will indicate it as 'Rejected Stage 2' when the Round has been ratified.

5.8 Contracting

When contracting with An Coimisiún, a successful applicant will be required to provide certain deliverables to An Coimisiún. For information, below is a **non-exhaustive** list of what would be required at contracting. Note that these documents do not have to be in place when making an application, they are included here for guidance only:

- Budget
- Finance Plan
- Bank Statement confirming co-funding capacity where required
- Retention of all receipts and invoices
- Project plan, including milestones, outputs and outcomes
- Grant Details
- No Set Off Letter from the relevant Bank
- Tax Clearance Information
- Insurance



Reporting

The grantee must report on the expenditure of the grant to confirm that it has been used for the purpose as outlined in the application for funding and as approved by An Coimisiún on the award of funding. Project outcome reports will be required. An Coimisiún will provide outcome report guidelines.

In this regard, all grantees must submit a final report within two months of the completion date of the project and grant agreement. All reports should contain information on how the money has been spent and the outcomes achieved. This should include but not limited to evidence of digital skills training attendance and completion, consultancy services provided, technology and digital projects implemented and any other feedback or areas you want to highlight. Please use the Final Project Report form published by An Coimisiún.

Audit

All grantees must retain documentary evidence of expenditure incurred against the grant for audit purposes. An Coimisiún will conduct random audits as provided for in An Coimisiún's funding contract. All funding contracts and associated deliverables and financials are also open to EU audits.

Duplication of Funding

If successful you will be asked to certify that the costs of the activities proposed are not being met from any other source.

5.9 Disclaimer

The information supplied in this document is not an exhaustive account of the statutory requirements and legal obligations on applicants for funding under the Scheme. It should not be regarded as a complete or authoritative statement of the law. Persons to whom the present document is made available must make their own independent assessment after taking their own professional advice and making such further investigations, as they deem necessary on all relevant matters.

An Coimisiún makes no representation or warranty, express or implied, with respect to the information contained in the present document or with respect to any oral or written information made or to be made available to any potential applicant or its professional advisers. Any liability in this regard is expressly disclaimed.



Appendix 1 – State Aid Exemptions under GBER

Article 17: Investment aid to SMEs

Type of Aid

 Investment aid to SMEs operating inside or outside the territory of the union shall be compatible with the internal market.

Eligible Costs

The eligible costs shall be either or both of the following:

- a) the costs of investment in tangible and intangible assets;
- b) the estimated wage costs of employment directly created by the investment project, calculated over a period of two years.
- c) a combination of part of the costs referred to in points (a) and (b) but not exceeding the amount of point (a) or (b), whichever is higher.
- In order to be considered an eligible cost for the purposes of this Article, an investment shall consist of the following:
 - a) an investment in tangible and/or intangible assets relating to the setting-up of a new establishment, the extension of an existing establishment, diversification of the output of an establishment into new additional products or a fundamental change in the overall production process of an existing establishment; or
 - b) an acquisition of assets belonging to an establishment that has closed or would have closed had it not been purchased. Sole acquisition of the shares of an undertaking does not qualify as investment. The transaction shall take place under market conditions. In principle, only the costs of buying the assets from third parties unrelated to the buyer shall be taken into consideration. However, if a member of the family of the original owner, or one or more employees, takes over a small enterprise, the condition that the assets shall be bought from third parties unrelated to the buyer does not apply.

Intangible assets shall fulfil all of the following conditions:

- a) they shall be used exclusively in the establishment receiving the aid;
- b) they shall be regarded as amortizable assets;
- c) they shall be purchased under market conditions from third parties unrelated to the buyer;
- d) they shall be included in the assets of the undertaking for at least three years;

Employment directly created by an investment project shall fulfil the following conditions:

- a) it shall be created within three years of completion of the investment;
- b) there shall be a net increase in the number of employees in the establishment concerned, compared with the average over the previous 12 months;
- c) it shall be maintained during a minimum period of three years from the date the post was first filled.

Aid Intensity

The aid intensity shall not exceed:

- a) 20 % of the eligible costs in the case of small enterprises;
- b) 10 % of the eligible costs in the case of medium-sized enterprises.



Article 18: Aid for consultancy in favour of SMEs

Type of Aid:

Aid for consultancy in favour of SMEs shall be compatible with the internal market.

Eligible Costs

- The eligible costs shall be the costs of consultancy services provided by external consultants.
- The services concerned shall not be a continuous or periodic activity nor relate to the undertaking's usual operating costs, such as routine tax consultancy services, regular legal services or advertising.

Aid Intensity

• The aid intensity shall not exceed 50 % of the eligible costs.

Article 25: Aid for research and development projects

Type of Aid

- Aid for research and development projects, including projects having received a Seal of Excellence quality label under the Horizon 2020 SME-instrument, shall be compatible with the internal market.
- The aided part of the research and development project shall completely fall within one or more of the following categories:
 - a) Fundamental research
 - b) Industrial research
 - c) Experimental development
 - d) Feasibility studies

Eligible Costs

- The eligible costs of research and development projects shall be allocated to a specific category of research and development and shall be the following:
 - a) personnel costs: researchers, technicians and other supporting staff to the extent employed on the project;
 - b) costs of instruments and equipment to the extent and for the period used for the project. Where such instruments and equipment are not used for their full life for the project, only the depreciation costs corresponding to the life of the project, as calculated on the basis of generally accepted accounting principles are considered as eligible.
 - c) costs for of buildings and land, to the extent and for the duration period used for the project. With regard to buildings, only the depreciation costs corresponding to the life of the project, as calculated on the basis of generally accepted accounting principles are considered as eligible. For land, costs of commercial transfer or actually incurred capital costs are eligible.
 - d) costs of contractual research, knowledge and patents bought or licensed from outside sources at arm's length conditions, as well as costs of consultancy and equivalent services used exclusively for the project:
 - e) additional overheads and other operating expenses, including costs of materials, supplies and similar products, incurred directly as a result of the project;
- The eligible costs for feasibility studies shall be the costs of the study.

Aid Intensity

- The aid intensity for each beneficiary shall not exceed:
 - a) 100% of the eligible costs for fundamental research;
 - b) 50% of the eligible costs for industrial research;



- c) 25% of the eligible costs for experimental development;
- d) 50% of the eligible costs for feasibility studies.
- The aid intensities for industrial research and experimental development may be increased up to a maximum aid intensity of 80% of the eligible costs as follows:
 - a) by 10 percentage points for medium-sized enterprises and by 20 percentage points for small enterprises.
 - b) by 15 percentage points if one of the following conditions is fulfilled:
 - i. The project involves effective collaboration:
 - between undertakings among which at least one is an SME, or is carried out in at least two Member States, or in a Member State and in a Contracting Party of the EEA Agreement, and no single undertaking bears more than 70 % of the eligible costs, or
 - between an undertaking and one or more research and knowledge-dissemination organisations, where the latter bear at least 10% of the eligible costs and have the right to publish their own research results;
 - ii. the results of the project are widely disseminated through conferences, publication, open access repositories, or free or open source software.
- The aid intensities for feasibility studies may be increased by 10 percentage points for medium-sized enterprises and by 20 percentage points for small enterprises.

Article 28: Innovation aid for SMEs

Type of Aid

• Innovation aid for SMEs shall be compatible with the internal market

Eligible Costs

- The eligible costs shall be the following:
 - a) costs for obtaining, validating and defending patents and other intangible assets;
 - costs for secondment of highly qualified personnel from a research and knowledge-dissemination organization or a large enterprise, working on research, development and innovation activities in a newly created function within the beneficiary and not replacing other personnel;
 - c) costs for innovation advisory and support services;

Aid Intensity

The aid intensity shall not exceed 50 % of the eligible costs.



Article 29: Aid for Process and Organisational Innovation

Type of Aid

Aid for process and organisational innovation shall be compatible with the internal market

Eligible Costs

- The eligible costs shall be the following:
 - a) personnel costs;
 - b) costs of instruments, equipment, buildings and land to the extent and for the period used for the project;
 - c) costs of contractual research, knowledge and patents bought or licensed from outside sources at arm's length conditions;
 - additional overheads and other operating costs, including costs of materials, supplies and similar products, incurred directly as a result of the project.

Aid Intensity

 The aid intensity shall not exceed 15 % of the eligible costs for large undertakings and 50 % of the eligible costs for SMEs.

Article 31: Training Aid

Type of Aid

- Training aid shall be compatible with the internal market.
- Aid shall not be granted for training which undertakings carry out to comply with national mandatory standards on training.

Eligible Costs

The eligible costs shall be the following:

- a) trainers' personnel costs, for the hours during which the trainers participate in the training;
- b) trainers' and trainees' operating costs directly relating to the training project such as travel expenses, accommodation costs, materials and supplies directly related to the project, depreciation of tools and equipment, to the extent that they are used exclusively for the training project;
- c) costs of advisory services linked to the training project;
- d) trainees' personnel costs and general indirect costs (administrative costs, rent, overheads) for the hours during which the trainees participate in the training.

Aid Intensity

The maximum aid intensities are as follows:-

Size of Undertaking	Small	Medium	Large
Maximum Aid Intensity	70%	60%	50%
Maximum Aid Intensity if	70%	70%	60%
training is given to			
workers with disabilities			
or disadvantaged			
workers			



- Where aid is granted to the maritime transport sector, the aid intensity may be increased to 100% of the eligible costs provided the following conditions are met:-
- a) The trainees are not active members of the crew but are supernumerary on board; and
- b) The training is carried out on board of ships entered in Union registers.

Appendix 2 - Definition of SMEs

The <u>European Commission Recommendation 2003/361/EC</u> (the "**Recommendation**") defines enterprises as follows:

"An enterprise is any entity engaged in an economic activity, irrespective of its legal form".

Enterprises qualify as micro, small and medium-sized enterprises (SMEs) under the Recommendation if they fulfil the criteria laid down in the Recommendation which are summarised in the table below.

In addition to the staff headcount ceiling, an enterprise qualifies as an SME under the Recommendation if it meets either the turnover ceiling or the balance sheet ceiling, but not necessarily both.

Micro Enterprise	Defined as having 9 employees or less and an annual turnover and/or annual balance sheet total not in excess of €2m.
Small Enterprises	Defined as having 49 employees or less and an annual turnover and/or annual balance sheet total not in excess of €10m.
Medium sized enterprises	Defined as having between 50 and 249 employees and an annual turnover not in excess of €50m and/or an annual balance sheet total not in excess of €43m.
Large enterprises	Defined as having in excess of 250 employees and an annual turnover in excess of €50m and/or an annual balance sheet total not in excess of €43m.



Appendix 3 – Assessment Scoring Matrices

Preliminary Assessment Scoring Matrix

Criteria	Yes/ No
Eligibility: Is the applicant eligible to apply for funding under the Digital Transformation Scheme and does the application comply with the fundamental requirements of the scheme? This has regard to whether: the status of the applicant complies with the requirements of the Scheme. Is the applicant an eligible regulated media organisation established within the EU and a provider of public service content?	
Has the applicant provided a Digital Transformation Plan? Has the applicant provided confirmation that the proposed project directly relates to Digital Transformation as specified in the Scheme.	
Is the application complete?	
Has the applicant complied with all the competition guidelines and submitted all the relevant documentation?	

If any of these minimum criteria are not met, applications will not be considered further.

Qualitative Assessment Scoring Matrix

Criteria	Available
Digital Transformation Impact, Incentive Effect & Quality of Application:	Score 50
To what extent does the proposal demonstrate alignment with the overall aims and objectives of Digital Transformation Scheme?	
Does the applicant demonstrate a clear need for digital transformation including goals, activities, timelines and results outlining how funding support will enhance their ability to deliver public service content to audiences more effectively and efficiently. Are the expected project outcomes clear and are they realistic?	
Could this project proceed in the same way without funding? Does the proposal explain clearly how the funding will make a difference (Incentive Effect) i.e. does the proposal aim to deliver significant and timely outcomes not possible without An Coimisiún's support?	
Does the proposal encourage plurality, increasing digital capability and activity across a diverse range of platforms meeting audiences on the platforms where they are?	
Feasibility, Resources & Case made for Funding (including track-record): To what extent does the proposal demonstrate ability to deliver the project?	40
Has the applicant provided a realistic Digital Transformation project plan and detailed how the proposal forms part of overall future business activities?	
Does the budget and budget notes explain why particular cost lines are necessary and justified? Does the proposal represent value-for-money and is the amount of funding requested from An Coimisiún realistic?	
Does the proposal specify the track record of the applicant and any key personnel involved in the project illustrating strength and suitability of the team including but not limited to demonstrating the relevant understanding of the technical, editorial, managerial skills and an understanding of the ethical, societal and digital risks associated with the proposed transformation (e.g data privacy, editorial independence, algorithmic bias)?	
Has the applicant satisfactorily demonstrated capacity to deliver, outlining the tools, technology or other resources used to carry out the work?	
risks associated with the proposed transformation (e.g data privacy, editorial independence, algorithmic bias)? Has the applicant satisfactorily demonstrated capacity to deliver, outlining the tools, technology or other	



Public Value and Innovation: Does the project deliver clear public value? Does the project provide evidence that it serves a clear public interest i.e. advancing digital accessibility for all users, enhancing access to trustworthy information, supporting democratic participation?	10
How innovative is the proposal in its approach to Digital Transformation i.e. through training, technologies, digital content distribution, workflows or audience engagement methods?	

An applicant must score a minimum of 50% under each criterion to qualify for consideration of award of funding.

Strategic Assessment Scoring Matrix

Criteria	Available Score
Digital Transformation Need and Potential for Sectoral Impact: To what extent does the project address a Digital Transformation need in the media organisation? Does the proposal outline how the funding is essential to support the viability of independent, trustworthy, accessible and diverse high-quality public service content? What is the scale and depth of the Digital Transformation project's potential impact? Will it create change? Set new digital standards within the organisation? Act as a potential exemplar and/or have shared applicability across the sector?	25
Digital Accessibility: Has the applicant outlined innovative approaches leveraging digital capability to advance digital accessibility to public service content?	20
Audience Engagement: Does the proposal leverage digital transformation to reach youth and minority/underserved audiences in more effective and efficient ways?	15
Irish Language: To what extent does the proposal advance the Irish Language through Digital Transformation?	15
Digital Sustainability: Has the applicant provided details of an approach to environmentally sustainable Digital Transformation initiatives that help lessen the impact of the project's activities on the environment?	15
Qualitative Assessment Score: Score awarded by the Qualitative Assessment Panel.	10



Appendix 4 - Digital Accessibility and Al Guidance

Digital Accessibility Guidance

This fund can support Irish media organisations to advance digital accessibility projects in line with the European Accessibility Act (EAA) and the National Human Rights Strategy for Disabled People 2025-2030. Projects must demonstrate both a clear digital transformation objective and a measurable improvement in accessibility for audiences.

In line with the principle of "Nothing About Us Without Us", applicants are strongly encouraged to consult with Disabled Persons' Organisations (DPOs) to ensure that the proposed solutions genuinely address the needs, preferences, and rights of people with disabilities. Projects that demonstrate meaningful co-design or consultation with disability stakeholders will receive positive consideration during evaluation. This approach aligns with Ireland's obligations under the UN Convention on the Rights of Persons with Disabilities (UNCRPD) and promotes the development of accessible digital tools informed by lived experience. For more information on universal design please consult: Centre for Excellence in Universal Design - Centre for Excellence in Universal Design

Eligible projects can include:

- Training Programmes on Inclusive Media Practices: including but not limited to accessibility standards, tools, and inclusive content design.
- Assistive Technologies in Media Production: Tools such as automated captioning/subtitling, audio description services, Irish Sign Language Interpretation or AI supporting real-time translation for users with disabilities. Accessible Content Management Systems (CMS)
- Accessible Public Service Content Platforms: Developing new accessible websites, mobile apps, or streaming services and inclusive audience engagement tools enabling persons with disabilities to participate more fully in journalism and public discourse.

Al Guidance

Funding is available for digital transformation projects, including those involving Artificial Intelligence, provided that all Al-related components comply with the EU Artificial Intelligence Act and demonstrate a clear commitment to the responsible, ethical, and transparent use of the technology.

Applicants must demonstrate a clear understanding of the Act's provisions, particularly as they relate to the use of high-risk AI systems. These include, but are not limited to, AI systems used in content moderation, biometric identification, or those that may influence democratic processes or access to information. All AI components in funded projects must reflect a commitment to trustworthy, transparent, and human-centred AI. Applicants must describe how human oversight will be implemented in both the technical design and operational deployment of the AI system ensuring content undergoes a process of human review/editorial control and someone holds editorial responsibility for its publication.

Applicants should demonstrate that they possess the necessary knowledge, skills, and organisational capacity to manage Al-related risks and obligations under the EU Al Act. This includes evidence of training for project leads and relevant staff. Proposals should include evidence of collaboration with legal, data protection, or Al ethics experts, where appropriate

A core requirement is the integration of effective human oversight mechanisms throughout the AI system lifecycle. This includes but is not limited to defined roles and responsibilities for human supervisors, preventing over-reliance on automation and enabling manual intervention where AI outputs may pose ethical,



legal, or reputational risks. Applicants must describe how human oversight will be implemented in both the technical design and operational deployment of the AI system.

Al Projects must uphold the highest standards of transparency and accountability, especially where Al may influence editorial processes, audience interactions, or public access to media. Applicants must explain how they will, where required, ensure explainability of Al systems and communicate the use of Al tools to users and the public monitoring and addressing unintended consequences (e.g. bias, misinformation)

Applicants are strongly encouraged to consult the EU AI Act for more information EU AI Act - DETE

