Proposal Evaluation Form

EUROPEAN COMMISSION

Horizon Europe (HORIZON)

Evaluation Summary Report - Innovation actions

Call: HORIZON-CL4-2025-03

Type of action: HORIZON-IA

Proposal number: 101296996

Proposal acronym: RADIATE

Duration (months): 48

Proposal title: Responsible, InnovAtive anD complIant europeAn daTa Ecosystems

Activity: HORIZON-CL4-2025-03-DATA-13

N.	Proposer name	Country	Total eligible costs	%	Grant Requested	%
1	THE UNIVERSITY OF NOTTINGHAM	UK	806,187.5	8.69%	806,187.5	9.27%
2	CHARITE - UNIVERSITAETSMEDIZIN BERLIN	DE	1,509,187.5	16.26%	1,509,187.5	17.36%
3	WAGENINGEN UNIVERSITY	NL	516,393.75	5.56%	516,393.75	5.94%
4	UNIVERSITAT WIEN	AT	468,750	5.05%	468,750	5.39%
5	VASTRA GOTALANDSREGIONEN	SE	339,562.5	3.66%	339,562.5	3.90%
6	AIT AUSTRIAN INSTITUTE OF TECHNOLOGY GMBH	AT	503,077.5	5.42%	503,077.5	5.79%
7	RHEINISCH-WESTFAELISCHE TECHNISCHE HOCHSCHULE AACHEN	DE	440,287.5	4.74%	440,287.5	5.06%
8	CERTX AG	CH	598,437.5	6.45%	418,906.25	4.82%
9	UPPSALA UNIVERSITET	SE	495,937.5	5.34%	495,937.5	5.70%
10	UNIVERSITEIT MAASTRICHT	NL	432,312.5	4.66%	432,312.5	4.97%
11	FONDEN DEMOCRACY X	DK	819,875	8.83%	819,875	9.43%
12	ATHINA-EREVNITIKO KENTRO KAINOTOMIAS STIS TECHNOLOGIES TIS PLIROFORIAS, TON EPIKOINONION KAI TIS GNOSIS	EL	425,938.75	4.59%	425,938.75	4.90%
13	EUROPEAN BUSINESS SUMMIT NETWORK	BE	338,437.5	3.65%	338,437.5	3.89%
14	AIQURIS GmbH	DE	1,355,063.75	14.60%	948,544.63	10.91%
15	REGULATORY AUTHORITY FOR ENERGY (RYTHMISTIKI ARHI ENERGIAS)	EL	232,190	2.50%	232,190	2.67%
	Total:		9,281,638.75		8,695,588.38	

Abstract:

RADIATE is a groundbreaking project designed to transform data governance by turning the complex landscape of EU legislation into an accessible, actionable process for innovators. The project's core activities focus on building a holistic ecosystem solution that goes far beyond simple legal guidance.

The project's unique approach lies in the integration of cutting-edge AI technology with a human-centric methodology. This is achieved by first building an AI-driven platform that will comprise advanced compliance technology integrating AI, cybersecurity, language technologies, and privacy preservation (Area 1 of the call). The RADIATE Platform will not just react to existing law; it will anticipate changes, providing organisations with real-time, actionable assurance to support their compliance efforts. This technical innovation is balanced by extensive real-world validation through diverse use cases, ensuring the RADIATE Platform is not only robust but also genuinely useful and tailored to the needs of different sectors. Partners will work together to bring the resulting TRL8 platform to market and ensure sustainability by providing services through integration into TEF Health.

A key differentiator is the project's commitment to a multi-actor, participatory approach. It will conduct citizen consultations to ensure the technology is aligned with public values and develop a detailed understanding of the EU data ecosystems. This deep engagement extends to a broad range of stakeholders—from regulators to industry bodies—to ensure the solution is both effective and trustworthy. Through co-design guided by systems-thinking, technology development will be responsive to the complexities of using AI for compliance in the real world. The project will then transform its findings into a comprehensive training program and policy advocacy, ensuring the knowledge and tools developed have a lasting legacy, influencing both industry practice and future European policy.

Evaluation Summary Report

Evaluation Result

Total score: 10.00 (Threshold: 10)

Criterion 1 - Excellence

Score: **4.00** (Threshold: 3 / 5.00 , Weight: -)

The following aspects will be taken into account, to the extent that the proposed work corresponds to the description in the work programme:
- Clarity and pertinence of the project's objectives, and the extent to which the proposed work is ambitious and goes beyond the state of the art.
- Soundness of the proposed methodology, including the underlying concepts, models, assumptions, inter-disciplinary approaches, appropriate consideration of the gender dimension in research and innovation content, and the quality of open science practices, including sharing and management of research outputs and engagement of citizens, civil society and end users where appropriate.

The RADIATE proposal aims to deliver an AI-enabled platform to support data compliance for data users by automating reasoning through compliance requirements, thus providing pragmatic, clear and actionable assurance to the users. This will include training to support users through the EU data ecosystem. The proposal's objectives are exceptionally clear and demonstrate a high degree of pertinence to the call, addressing Area 1, "Advanced compliance technology".

It carefully and thoroughly explains the current barriers towards adherence to compliance, and clearly explains the objectives of the project, divided into four clear objectives. Its central aim, to develop a TRL 8 platform that transforms the "complex landscape of EU legislation into an accessible, actionable process," is highly ambitious, both in terms of scope and innovation level. However, the way in which the proposed work will reach TRL8 is unclear. Five relevant use cases are clearly described, although there is a lack of clarity regarding what actions a user could/will take to address/overcome the non-compliance cases detected by the RADIATE solution.

The main activities of the methodology are clearly detailed, and the underlying concepts, models, and assumptions are clearly stated; in fact, the soundness of the proposed methodology is a defining strength of this proposal. The proposal presents a mature, interdisciplinary methodology that strategically balances its technical core (WP2, the AI-driven NLP and reasoning engine) with foundational work packages designed to address the "invisible labor" and administrative burdens of achieving compliance. This is demonstrated by the design of the architecture and choice of technologies (use of LLMs, the derivation of a knowledge graph and a semantic representation of regulations using NLP into machine readable requirements) resulting in a viable approach. The methodology is further strengthened by a clear commitment to open science practices and a well-defined, multi-actor approach to the "engagement of citizens and end users" through WP6. Finally, the project is clearly interdisciplinary through its selection of partners as well as the methodology, combining research, development, in-situ testing with a large user group (including citizens), and dissemination and exploitation plans.

Although it could be argued that the proposal does not clearly state how the proposed work goes beyond the state of the art (as there is no direct comparison to current existing solutions and the planned contributions in terms of innovations), it does propose an innovative combination of NLP and formal methods (e.g. semantic reasoning) that should move the proposal beyond the current state of the art, together with a platform that not only reacts to existing law but actively "anticipates changes" in the regulatory environment. However, there is a lack of clarity regarding the potential influence of the gender dimension, which is especially crucial in the healthcare domain. Finally, the proposal fails to satisfactorily identify the mandatory complementarities with other projects from the HORIZON-CL4-2024-DATA-01-01 and HORIZON-CL4-2021-DATA-01-01 call topics.

Criterion 2 - Impact

Score: **3.50** (Threshold: 3 / 5.00 , Weight: -)

The following aspects will be taken into account, to the extent that the proposed work corresponds to the description in the work programme:
- Credibility of the pathways to achieve the expected outcomes and impacts specified in the work programme, and the likely scale and significance of the contributions from the project.
- Suitability and quality of the measures to maximise expected outcomes and impacts, as set out in the dissemination and exploitation plan, including communication activities.

The pathways for achieving the expected outcomes are detailed and credible in terms of adequacy and ambition. They focus is primarily on contributing to the specific work programme objectives, though little is said regarding their relevance to the remaining objectives.

The likely "scale and significance" of the contributions overall are potentially very high, based on an exceptionally strong and suitable exploitation plan, and the expected impacts are described with respect to their work packages. The credibility of the pathway related to the concrete, structural integration into the TEF-Health platform is outstanding, aided by the fact that Partner 2 is the lead of the 60M€ TEF-Health project; thus providing a direct, non-speculative route to a large-scale user base. Furthermore, the potential is huge for the system to assist users to easily ensure adherence to the increasing amount of regulations. Yet little detail is given as to possible synergies with the Data Spaces Support Centre (DSSC), a mandatory requirement for all proposals in this topic, thus the connection to the core European data ecosystem is unclear.

The impact strategy is supported by identifying barriers to achieving the targeted impact and addressing these with appropriate mitigation strategies. However, SMART goals are not considered, and the KPIs listed for the broader impact are very general and only partially measurable, other impact related KPIs are not clearly described. Therefore, it may be difficult for the project to measure its success through the use of KPIs, although the proposal outlines a strategy whereby the outcome of the project will be tested on the platform itself. Evaluating RADIATE with regards to compliance and regulations will greatly justify the impact of the project, if the evaluation is successful.

The dissemination, exploitation and communication plan is clearly described and extensive, with a suitable set of stakeholders, objectives, activities and timeline that should maximise the expected outcomes of the project. There is a high degree of ambition in the number of activities, which could pose challenges, but could also contribute to delivering the potential impact. Dissemination and communication activities not only rely on traditional channels, but also consider more modern approaches to reach citizens.

The strategy for the management of intellectual property is well outlined, however the proposal fails to consider the expected revenue for profit-partners, consequently, the return on investment (ROI) for these partners cannot be assessed.

Criterion 3 - Quality and efficiency of the implementation

Score: **2.50** (Threshold: 3 / 5.00 , Weight: -)

The following aspects will be taken into account, to the extent that the proposed work corresponds to the description in the work programme:
- Quality and effectiveness of the work plan, assessment of risks, and appropriateness of the effort assigned to work packages, and the resources overall.
- Capacity and role of each participant, and the extent to which the consortium as a whole brings together the necessary expertise.

The quality of the proposed work plan is good and demonstrates a clear, coherent, and well-structured approach to achieving the project's objectives. The description of each of the individual work packages (WPs) is detailed and precise, with clearly defined tasks, deliverables, and interdependencies, and the allocation of these across members of the consortium reflects the project's robust interdisciplinary methodology. However, there is a lack of sufficient technical detail for the technology implementation work packages; specifically with respect to the choice of technologies upon which the work is going to be realised. Moreover, the plan adopts a waterfall approach that is mapped out over a four year duration; which is a sound approach in its own right. However, given the rate at which AI research is evolving, there may be a risk that decisions made early on may lose relevance throughout the project's duration, and little is stated as to how agile the project will be in adopting new innovation and research.

The assessment of risks in certain areas is mature; the Ethics Self-Assessment correctly identifies subtle but critical risks such as "automation bias", and proposes sound mitigations, including a "human-in-the-loop" design and a formal "Human Rights Impact Assessments (HRIA)" methodology. However, the level of detail regarding the identification of potential scientific, technical, and organisational risks is poor. Furthermore, there is insufficient attention to the potential risk of losing key partners and mitigating this through the identification of other capability or research to ensure the successful completion of the proposed work.

The allocation of effort and resources across work packages is broadly appropriate, reflecting good consideration of workload distribution and the specific expertise required for each task. However, the allocation of resources to project coordination and management is less than 10% which for large, regulated projects in a waterfall approach may be an underestimation of the resources required.

The consortium has a well balanced set of partners, ranging from academic research institutions, subject matter expert organisations, technology partners and end-user organisations in two main deployment sectors. This composition demonstrates a sophisticated understanding of the requirements for market and regulatory acceptance and provides maximum confidence in the project's ability to deliver a finalised, certified-ready product. Each participant's role is clearly defined and well justified. However, there is a heavy focus on the healthcare domain and while there is one use case from a further domain, it is not clearly shown how the contributions will have an overall applicability.

Scope of the application

Status: **Yes**

Comments (in case the proposal is out of scope)

Not provided

Exceptional funding

A third country participant/international organisation not listed in the General Annex to the Main Work Programme may exceptionally receive funding if their participation is essential for carrying out the project (for instance due to outstanding expertise, access to unique know-how, access to research infrastructure, access to particular geographical environments, possibility to involve key partners in emerging markets, access to data, etc.). (For more information, see the HE programme guide)

Please list the concerned applicants and requested grant amount and explain the reasons why.

Based on the information provided, the following participants should receive exceptional funding:

Not provided

Based on the information provided, the following participants should NOT receive exceptional funding:

Not provided

Use of human embryonic stem cells (hESC)

Status: **No**

If YES, please state whether the use of hESC is, or is not, in your opinion, necessary to achieve the scientific objectives of the proposal and the reasons why. Alternatively, please state if it cannot be assessed whether the use of hESC is necessary or not, because of a lack of information.

Not provided

Use of human embryos

Status: **No**

If YES, please explain how the human embryos will be used in the project.

Not provided

Activities excluded from funding

Status: **No**

If YES, please explain.

Not provided

Exclusive focus on civil applications

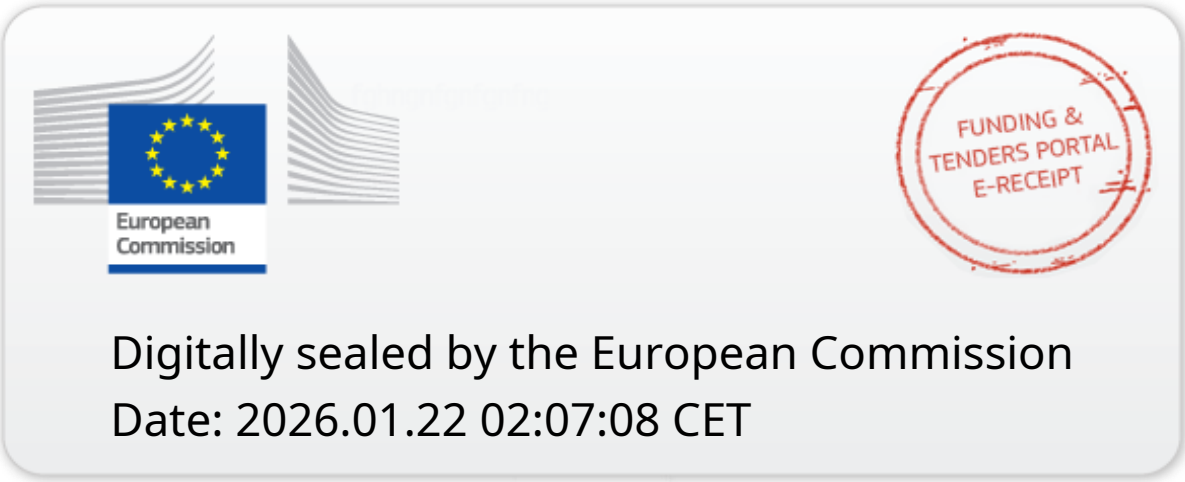
Status: **Yes**

If NO, please explain.

Not provided

Overall comments

Not provided



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