

TERMS OF REFERENCE (ToR)

SAFEBORDERS Project

AI Intelligence Platform Development

PRAG-style External Action Tender

Project duration: January 2025 – December 2026 (24 months).

1. Background and Context

The **SAFEBORDERS** project is funded by the European Union under the **Internal Security Fund (ISF) – Organised Crime call (ISF-2023-TF2-AG-OC)** and aims to strengthen the prevention and prosecution of trafficking in human beings, with a particular focus on child trafficking. The project is implemented by a transnational consortium coordinated by the Centre for European Constitutional Law (Greece) and involving public authorities, research institutes, civil society organisations and technical partners from Belgium, Bulgaria, Finland, Greece, Italy, Poland, Portugal and Romania, with cooperation extending to Western Balkan countries. By bringing together judicial authorities, prosecutors, frontline practitioners and technology experts, the project promotes cross-border cooperation, capacity building and the development of innovative tools to support victim identification, investigations and prosecutions.. One of the main projects focuses is on the development of an AI-powered Intelligence Suite designed to analyse patterns, trends, methodologies, and systemic characteristics of trafficking phenomena.

Due to legal, ethical, and privacy constraints, the project does not rely exclusively on closed judicial case files. Instead, it applies a diversified, EU-compliant data strategy grounded in retrospective, lawfully obtained, and anonymised data.

2. Objectives of the Assignment

The objective of this assignment is to design, develop, test, and deploy secure, ethical, and privacy-preserving AI-based IT tools capable of

processing and analysing structured and unstructured anonymised data related to trafficking in human beings. The tools shall support research, prevention, policy development, risk analysis, and training activities under SAFEBORDERS project.

3. Scope of Work

The contractor shall be responsible for the following tasks:

- Requirements analysis in cooperation with the respective project work package partners and data-contributing stakeholders
- Design of system architecture and AI models for trend, pattern, and systemic analysis
- Development of data ingestion pipelines aligned with work package submission and classification rules
- Implementation of structured metadata handling and typology-based data classification
- Integration of privacy-by-design anonymisation mechanisms
- Implementation of bias mitigation, transparency, and explainability features
- Testing, validation, and quality assurance of AI components
- Deployment in a secure, EU-hosted environment
- Preparation of technical documentation, user guidance, and data governance documentation
- Provision of maintenance and technical support during the contract period

4. Data Categories and Sources

All AI tools developed under this assignment shall rely exclusively on data submitted in accordance with Work package Partner Instructions (see

Annex I) . Each data item must be retrospective, lawfully obtained, appropriately anonymised, and clearly classified under exactly one of the following categories:

- Case Files: Closed judicial or administrative cases for which a final decision has been issued.
- National / International Reports: National, regional, EU, or international reports, including statistics, legislation, regulatory frameworks, methodologies, trend analyses, academic research, and civil society publications.
- Frontline Reports: Structured reports produced by frontline actors (such as NGOs, shelters, social services, outreach teams, border authorities), referring to documented cases, aggregated observations, operational trends, or systemic gaps.

Unsubstantiated or intelligence-only data, including suspected or alleged cases, lists or profiles of individuals, and ongoing investigations, shall not be incorporated.

5. Data Packaging, Metadata, and Access Rules

Data ingestion and processing functionalities shall be compatible with packaging and submission rules. Each data item shall be treated as a single submission unit and may consist of one file or a compressed archive where multiple files relate to the same item.

The system shall support structured metadata ingestion, including mandatory metadata elements such as submission type, country, years covered, trafficking type, access conditions, and data origin. Where data sources are provided as links, access conditions (open, free registration, or paid access) must be clearly documented.

6. Anonymisation, Privacy, and Data Protection

Privacy-by-design and data protection are core principles of the SAFEBORDERS Intelligence Suite. The contractor shall implement advanced

anonymisation mechanisms ensuring the removal or pseudonymisation of all personal identifiers prior to processing. No information enabling direct or indirect identification of children shall be processed.

All processing shall comply with Regulation (EU) 2016/679 (GDPR), applicable national legislation, and the project's ethical and fundamental rights safeguards governing the use of AI tools in the context of trafficking in human beings.

7. Cultural Sensitivity and Trauma-Informed Design

The AI tools shall support culturally sensitive and trauma-informed use. Functional design shall ensure that outputs, interfaces, and guidance support respectful engagement and avoid re-traumatisation. Where relevant, linguistic and contextual support modules shall be designed for scalability.

8. Legal, Ethical, and Regulatory Framework

All activities shall comply with EU and national legal frameworks, including GDPR and relevant ethical standards. The contractor shall ensure alignment with the principles of the EU Artificial Intelligence Act, including risk-based system design, transparency, human oversight, and bias mitigation.

Cybersecurity measures shall follow EU best practices, including secure development life cycles, access control, encryption, logging, and incident response.

9. Reporting and Deliverables

The contractor shall provide regular progress reports, technical demonstrations, and agreed deliverables. Deliverables shall include technical documentation, data governance documentation, GDPR and ethics compliance documentation, and a final handover report.

10. Contractual Framework

The contract shall be governed by PRAG rules applicable to EU external action service contracts. Payments shall be linked to the successful completion of milestones and deliverables.

11. Requirements for Bidders (Eligibility and Technical Capacity)

Bidders must demonstrate adequate professional, technical and operational capacity to successfully design, develop and deploy the AI-based analytical platform described in this Terms of Reference. The following minimum requirements apply.

11.1 Professional Experience

The bidder must have proven experience in the development and implementation of advanced IT systems and AI-based analytical tools. In particular, the bidder shall demonstrate:

- At least **3 years of professional experience** in software development involving data analytics, machine learning or natural language processing.
- Previous involvement in **at least two (2) projects** concerning the development of analytical platforms, decision-support systems, or data processing tools handling complex structured and/or unstructured datasets.
- Experience in projects involving **sensitive or regulated data environments** (e.g. public administration, justice sector, research, healthcare, social services, or similar).
- Demonstrated capacity to implement **privacy-preserving and security-oriented architectures**.

11.2 Technical Expertise

The bidder must demonstrate the availability of qualified personnel with expertise covering the following areas:

- Machine learning / artificial intelligence development
- Data engineering and database architecture

- Cybersecurity and secure system deployment
- Data protection and privacy-by-design implementation
- User interface and usability design
- Technical documentation and system maintenance

At least one team member shall have documented experience in **ethical AI or trustworthy AI frameworks**, including transparency, explainability, bias mitigation, and human oversight.

11.3 Legal and Compliance Capacity

The bidder must demonstrate knowledge and practical experience in compliance with:

- Regulation (EU) 2016/679 (GDPR)
- Data anonymisation or pseudonymisation techniques
- Ethical handling of sensitive datasets
- EU standards for secure software development

Experience with projects funded by the European Union or international organisations will be considered an advantage but is not mandatory.

11.4 Operational Capacity

The bidder must:

- Be able to deploy and host solutions within the European Economic Area
- Provide maintenance and technical support during the contract period
- Ensure documentation and training materials in English
- Guarantee continuity of service through an identified project team

11.5 Exclusion Criteria

Bidders must not be subject to exclusion grounds under applicable EU procurement rules and must be able to provide declarations and supporting documents upon request.

Submission Deadline and Implementation Timeline

Bids must be submitted no later than **20 February 2026** at 23:59 (CET). Proposals received after the deadline will not be considered.

The selected contractor shall ensure the timely development of the AI platform in accordance with the project work plan. In particular, a functional pilot version of the platform must be delivered and ready for testing by **30 April 2026**. Subsequent refinements and adjustments will be implemented following the testing phase and validation by the project partners.

Annex I

Partner Instructions for Packaging and Submitting Data

1. Purpose

These instructions explain how SAFEBORDERS project partners must package, classify, and submit data to Vela in order to support the design and calibration of the SAFEBORDERS AI tools.

The tools will analyse patterns, trends, methodologies, and systemic characteristics related to trafficking in human beings, with a particular emphasis on child trafficking.

All submissions must be:

- Retrospective
- Lawfully obtained
- Appropriately anonymised
- Clearly classified and documented

2. Mandatory Submission Type Flag

Each item submitted must be flagged as one (and only one) of the following categories:

A. Case File

Closed judicial or administrative cases only, where a final decision has been issued.

B. National / International Report

National, regional, EU, or international reports, including but not limited to:

- Statistics
- Law reform and legislation
- Regulatory frameworks
- Methodologies
- Trend and risk analysis
- Academic research
- Civil society reports

C. Frontline Report

Structured reports produced by frontline actors (NGOs, shelters, social services, outreach teams), referring to:

- Documented cases
- Aggregated observations
- Operational trends
- Systemic gaps

This flag must appear:

- In the file name

- In the metadata/typology sheet

3. Links vs Documents – Access Rules

Preferred option: Accessible links

Partners should prioritise providing links instead of documents, provided that the link leads to content that:

- Is publicly accessible, or
- Requires only a free registration

Links must be accessible to Vela and the SAFEBORDERS tools without institutional credentials.

3.1 Links requiring free subscription

If access requires free registration, partners must:

- Provide the link
- Clearly note: *“Free subscription required before access”*

3.2 Paid subscription – partner has access

If access requires a paid subscription and the partner already has access, partners must:

- Provide the link as reference, and
- Upload the full document as an attachment

3.3 Paid subscription – partner has no access

If the partner does not have access but recommends the source, partners must:

- Provide the link
- Flag clearly that payment is required
- If possible, indicate:
 - Approximate subscription cost
 - Payment model (annual / monthly / per report)

4. File Packaging Rules

One item = one submission

Each individual item (case file, report, or frontline report) must be submitted as one unit.

- Single file → submit directly
- Multiple files relating to the same item → compress into one ZIP folder

Examples:

- Closed case decision + annexes → one ZIP
- Report + dataset + methodology note → one ZIP

5. Submission Email & File Naming Convention (Mandatory)

Data submissions must be made to the specially created email: sbdata@vela.ngo No submissions should be made to Vela team members individual emails.

Each submission must follow the structure below and include the official SAFEBORDERS Partner Code.

[PARTNER-CODE][TYPE][COUNTRY][YEAR][SHORT-DESCRIPTOR].zip / .pdf / .docx

Where:

- **PARTNER-CODE** = official SAFEBORDERS partner number/code
- **TYPE** = CASE / REPORT / FRONTLINE
- **COUNTRY** = ISO or commonly accepted country abbreviation
- **YEAR** = main year covered (or year of decision for cases)
- **SHORT-DESCRIPTOR** = concise thematic description (no spaces)

Examples

- SB03_CASE_ROU_2020_ChildLabourTrafficking.zip
- SB01_REPORT_EU_2023_THB_Trends.pdf
- SB05_FRONTLINE_GRC_2021_UAC_Exploitation.docx

The partner code must:

- Appear first in the filename
- Match the official SAFEBORDERS partner list
- Be used consistently for all submissions

6. File Size and Transfer Method

Size thresholds

- **Up to 20 MB (zipped):** submit directly via email or designated upload channel
- **Over 20 MB:** use a secure file-transfer service

Partners may use:

- WeTransfer
- SwissTransfer
- OneDrive / SharePoint shared link
- Google Drive (download access enabled)
- Dropbox (download access enabled)

Links must:

- Allow file download
- Remain active for at least 30 days

7. Anonymisation Requirements

For Case Files and Frontline Reports:

- All personal identifiers must be removed prior to submission (unless fully in the public domain)
- No names, ID numbers, addresses, or contact details
- No information that could indirectly identify a child

If anonymisation is already embedded in the source material, this must be noted in the metadata.

8. Mandatory Metadata / Typology Information

Each submission must include a metadata sheet (Word, Excel, or designated form).

Core metadata (all submissions)

- SAFEBORDERS Partner Code
- Submission type (Case / Report / Frontline)

- Country or countries concerned
- Year(s) covered
- Trafficking type:
 - Child trafficking
 - Labour trafficking
 - Sexual exploitation
 - Criminal exploitation
 - Mixed / other
- Organization submitting
- Contact person (name, role, email)

Additional metadata – Case Files

- Year of crime
- Year of decision
- Type of decision (judicial / administrative)
- Authority issuing the decision
- Victim category (e.g. UAC, adult, mixed)
- Cross-border element (yes / no)

Additional metadata – National / International Reports

- Reporting organization / author
- Report type (official / academic / civil society)
- Geographic scope (national / EU / international)
- Methodology type (legal analysis, statistics, qualitative, mixed)
- Access type (open / free subscription / paid)

Additional metadata – Frontline Reports

- Type of frontline actor (NGO, shelter, outreach, social service)
- Nature of content (case-based / aggregated trends / operational analysis)
- Time period covered
- Level of aggregation (local / regional / national)

9. Quality and Scope Limitations

Partners must not submit:

- Open or ongoing cases
- Suspected or alleged cases
- Intelligence-only material
- Lists or profiles of individuals

The SAFEBORDERS tools are designed for pattern and system analysis, not operational enforcement.

10. Optional (Strongly Encouraged)

- Short explanatory note (½–1 page) explaining relevance
- Indication of how the item could support prevention, policy, or training
- Note if the source is updated periodically

11. Support and Clarifications

Partners are encouraged to contact Vela in advance for:

- Packaging questions
- Anonymisation guidance
- Access or subscription clarifications

ANNEX I: Parnter Submission Checklist

Before submitting, confirm the following:

- Submission type clearly flagged (Case / Report / Frontline)
- SAFEBOARDS Partner Code included in filename
- File naming convention followed
- One item per submission
- Files zipped where multiple documents exist
- File size within limits or shared via secure transfer
- All personal data anonymised
- Metadata sheet completed
- Access type (open / free / paid) clearly indicated

ANNEX II: GDPR and Ethical Compliance Checklist

- Data is retrospective and closed
- No ongoing investigations included
- No personal identifiers present
- No identifiable data related to children
- Purpose limited to analysis and tool design
- Lawful basis for data sharing confirmed
- Data minimisation respected
- Secure transfer method used
- Ethical risks assessed

If any item above cannot be confirmed, do not submit without contacting Vela.

ANNEX III: PARTNER SUBMISSION TEMPLATE

SAFEBORDERS Partner Code:

Organization Submitting:

Contact Person (Name / Role / Email):

Submission Type:

Country/Countries:

Year(s) Covered:

Trafficking Type:

Brief Description:

Access Type:

Link (if applicable):

Paid Subscription Cost (if applicable):

Additional Metadata (depending on submission type):