Open Data Maturity

Policy

2025
Open Data Maturity Report

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Chapter 4: Open data policy

Over the years, the EU has developed a comprehensive policy framework to accelerate the opening of data held by the public sector. The Open Data Directive (Directive (EU) 2019/1024) is the most recent framework for open data policy in the EU. The directive, which had to be transposed into EU Member States' national laws by July 2021, aims to enhance the openness and utility of public sector data through requirements such as:

- stimulating the publishing of dynamic data and the uptake of application programming interfaces (APIs);
- limiting the exceptions under which public bodies may charge more than the marginal costs of dissemination for the reuse of their data;
- strengthening the transparency requirements for public–private agreements involving public sector information.

The directive applies to a wide range of information (e.g. written texts, databases and audio files) held by Member States' public sector bodies, public authorities, publicly owned companies and publicly funded research initiatives.

The directive also introduced the concept of high-value datasets (HVDs), which are public datasets associated with important socioeconomic benefits for society, the environment and the economy. The related implementing regulation (Commission Implementing Regulation (EU) 2023/138) sets out rules to ensure that certain datasets included in the six thematic categories defined in the regulation are made available free of charge, in machine-readable formats, through APIs and, where relevant, as a bulk download.

The **policy** dimension of the open data maturity (ODM) assessment is designed to encourage the practical implementation of policy measures. Governance structures, operating models, processes and activities are needed to realise the ambitions outlined in policies and strategies.

In brief, the policy dimension investigates countries' policies and strategies regarding open data, the national governance models for managing open data and the measures deployed to implement the policies and strategies. Table 1 summarises the key elements of the policy dimension.

Table 1: Indicators of the policy dimension

Indicator	Key elements
Policy framework	This indicator assesses whether national and subnational open data policies and strategies exist and how comprehensive they are. It looks at the presence of action plans, measures to incentivise publication and reuse, and support for real-time, geospatial and citizen-generated data. It also considers discoverability on the European Data Portal, data inventories and progress on HVDs.
Governance of open data	This indicator explores how governance structures enable coordination and stakeholder inclusion. It considers the existence of governance models, official roles and public documentation of responsibilities. It also looks at support for local and regional initiatives and regular exchanges between providers, reusers and open data officers.
Open data implementation	This indicator evaluates how policies and strategies are put into practice. It looks at data publication plans, monitoring and revision processes, and measures to address implementation challenges. It also considers support for data holders, training for civil servants and activities promoting open data literacy across society.

This chapter will first present overall performance on the policy dimension and then provide a summary of the results and best practices for each indicator.

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4.1. Overall performance on the policy dimension

In 2025, the policy dimension continues to lead in maturity across the EU-27, maintaining its position as the most advanced dimension in the ODM assessment. The average maturity score in the EU-27 is 93 % (Figure 1). This marks a 2 percentage point (pp) increase compared with 2024 and the second consecutive year that the policy dimension has exceeded the 90 % threshold. The growth is largely attributed to a 3 pp rise in the 'policy framework' indicator, which now also stands at 93 %, the largest increase among the three policy indicators. The 'open data implementation' indicator also saw a 2 pp improvement and is the most mature indicator of the policy dimension, reaching 94 % maturity.

At the country level, **Estonia**, **France**, **Italy**, **Lithuania**, **Poland** and **Ukraine** fulfil all the requirements (100 %) set out in this dimension (Figure 2). **Czechia**, **Ireland**, **Spain** and **Cyprus** follow closely, with scores of 99 %, each excelling in different indicators: **Cyprus** achieved full marks in the 'governance of open data' indicator, while **Czechia** and **Ireland** did so in the 'open data implementation' indicator. Overall, 18 countries scored at least the same as the EU-27 average of 93 %.

Highlight from Italy – ensuring effective policy implementation

A relevant development observed in this year's report is how countries are strengthening processes to implement and monitor open data policies. **Italy** offers a strong example through its structured approach combining planning, monitoring and capacity building.

Public administrations are required to adopt data publication plans, as recommended by the national open data guidelines. These plans prioritise HVDs, dynamic data and user-requested information. Concrete examples include the monthly publication calendar of the National Institute for Insurance against Accidents at Work and regional strategies such as Apulia's Decision Support System project, which integrates administrative data (e.g., protocol and document management) and domain-specific datasets (e.g., tourism, culture, etc.) into a single regional data lake.

Implementation is supported by robust monitoring. The Agency for Digital Italy (AgID) tracks progress through its digital transformation dashboard, which reports dataset growth on dati.gov.it and progress against targets in its three-year plan for information technology in public administration. The basket of key datasets further enables annual monitoring at the national and regional levels.

Policies are regularly updated: the latest three-year plan (2024–2026) was adopted in December 2024. Guidelines also define licensing requirements and recommend International Organization for Standardization standards for data quality.

To assist data holders and civil servants, AgID provides guidance, conducts webinars and launched the AgID Academy to strengthen digital skills. Training initiatives such as the national strategy for digital skills, the Syllabus platform and programmes by the National School of Administration ensure effective policy implementation across all levels (i.e. national and regional, as previously mentioned).

Read more about this trend in Section 4.4.

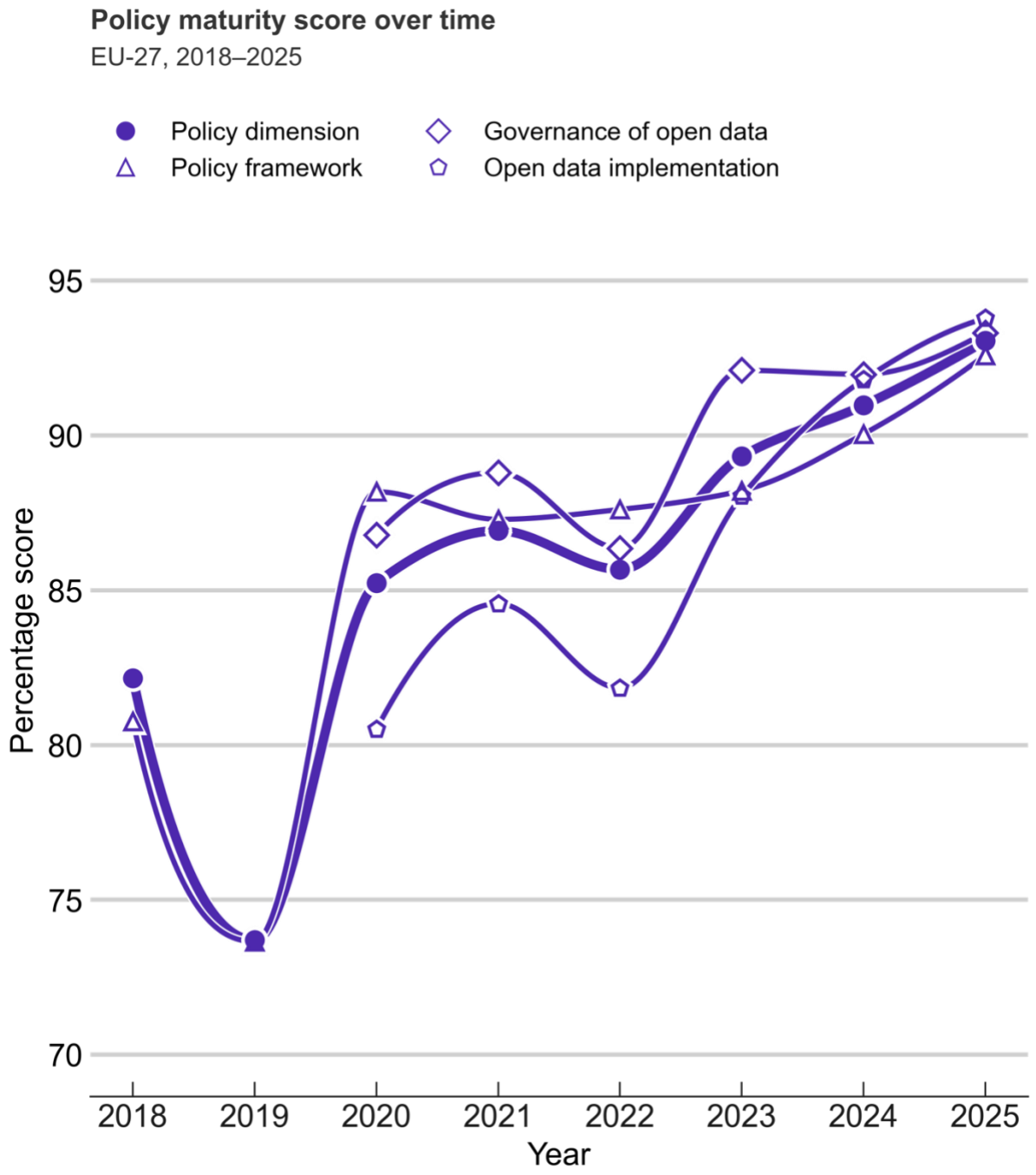

Figure 1: The EU-27 average score on the policy dimension has risen steadily over the past four years (2022–2025).

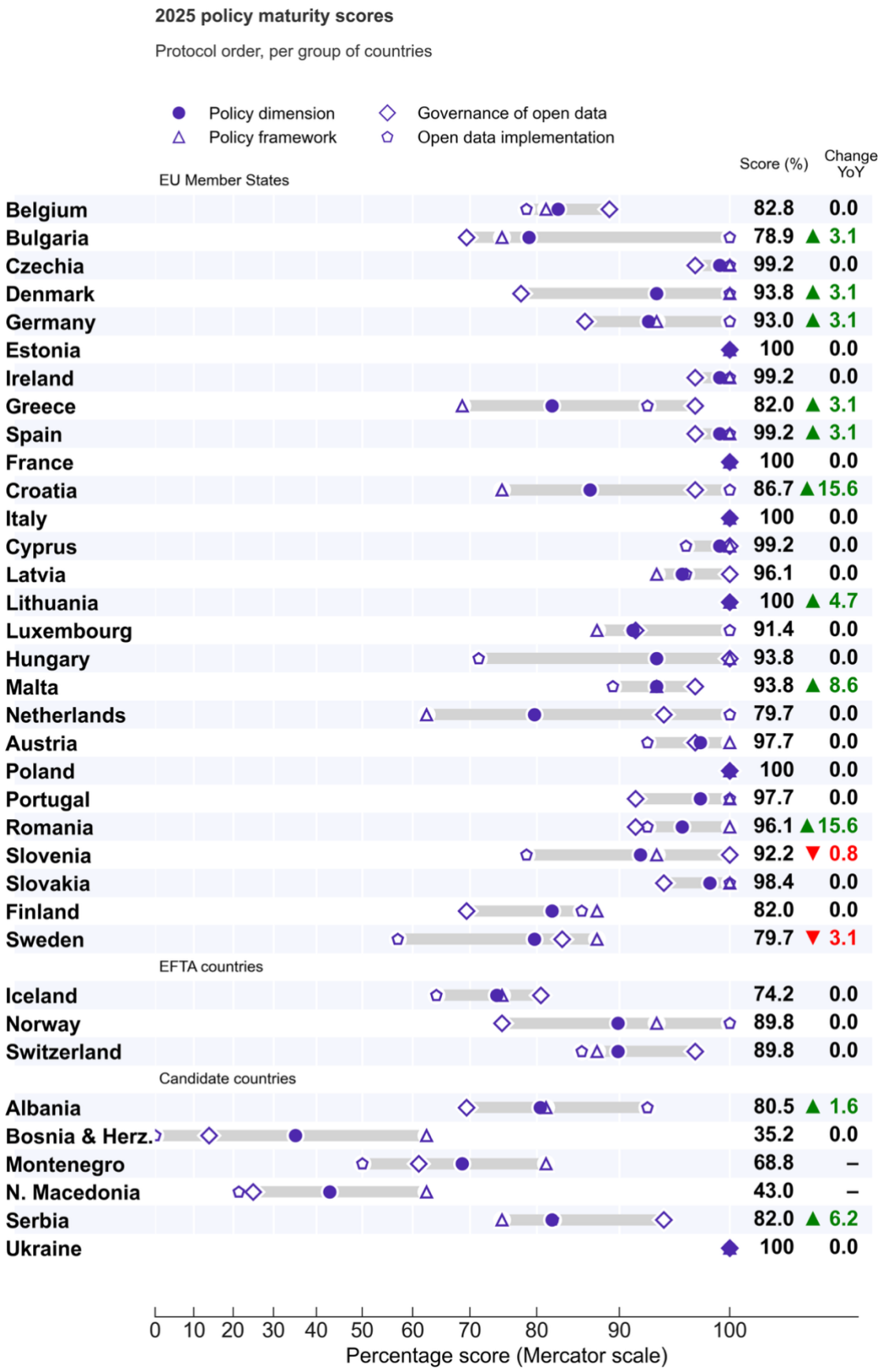

Figure 2: Eleven participating countries improved their scores on the policy dimension in 2025.
NB: EFTA, European Free Trade Association; YoY, year-on-year.

Croatia (+ 16 pp), **Romania** (+ 16 pp) and **Malta** (+ 9 pp) recorded the strongest year-on-year improvements in the policy dimension. **Croatia's** progress was driven by major gains in the 'governance of open data' indicator (+ 33 pp), following the official establishment of a national coordination body to oversee and support open data policy implementation. **Romania** achieved the greatest increase in the 'policy framework' indicator (+ 31 pp), largely due to the adoption of the national open data strategy for 2024–2028 and its action plan, which introduced clear objectives and governance structures. **Malta's** improvement in the policy dimension was supported by a 29 pp rise in the 'open data implementation' indicator. This growth reflects Malta's updated legislation, and the introduction of publication plans at the level of individual public bodies, ensuring consistent application of open data policies and strengthening governance processes.

Highlight from Croatia – inclusive governance for open data

Croatia has introduced a robust governance model to drive its open data agenda. In 2025, the Member State established the Coordination for the Implementation of the Open Data Policy, a multistakeholder body that monitors compliance, improves data accessibility and supports public authorities. Members include representatives from the Ministry of Justice, Public Administration and Digital Transformation, the Office of the Information Commissioner and the State Geodetic Administration. The coordination body can form thematic working groups involving local authorities, academia, businesses and civil society, ensuring broad participation.

This model builds on the Act on the Right to Access to Information, which mandates public bodies to appoint information officers responsible for publishing data and handling reuse requests. At the national level, the open data portal serves as a central hub. It is complemented by local portals such as the City of Zagreb's platform, which publishes machine-readable datasets for reuse.

Knowledge exchange is embedded in Croatia's approach: coordination meetings, regular updates and shared resources on standards foster collaboration between the national team and portal maintainers. Partnerships with academia, such as the University of Zagreb's Faculty of Electrical Engineering and Computing, further strengthen the ecosystem by engaging students in dataset quality analysis.

This inclusive governance structure ensures alignment between national and local initiatives and promotes stakeholder engagement across sectors.

Read more about this trend in Section 4.3.

Highlight from Poland – building a reuse culture through its open data handbook
European countries are increasingly using practical resources to promote open data reuse within the public sector. **Poland** stands out with the second edition of its open data handbook, published by the Ministry of Digital Affairs. This updated handbook responds to the needs of government offices by providing clear steps to build an organisational structure for data openness and reuse. It introduces new data categories, explains how regulations shape open data policies and showcases ready-made solutions such as Poland's Data Portal and the Polish portal for culture and science. The handbook serves as a checklist for offices, guiding them through their responsibilities for opening data and fostering a reuse culture. It complements Poland's open data programme for 2021–2027 and the associated legal standard, which define the 'pillars of openness' and include tools such as an openness checklist for compliance. **Read more about this trend in Section 4.2.**

Overall, only two countries – **Slovenia** and **Sweden** – experienced minor decreases in their performance on the policy dimension year-on-year. In both cases, the decrease (Slovenia, – 1 pp; Sweden, – 3 pp) was driven by a reported reduction in the number of events held annually to promote open data and data literacy to a broader public.

4.2. Policy framework

The 'policy framework' indicator evaluates open data policies, strategies and action plans at the national, regional and local levels. Specifically, this indicator investigates whether concrete mechanisms are in place to support the publication of, access to, discoverability of and reuse of several types of data, including real-time, geospatial and citizen-generated data.

Open data policies and strategies

National open data policies are formalised rules and guidelines that govern open data within a country. In the case of Member States, national policies should include legislative measures to comply with the Open Data Directive, ensuring the reuse of public sector information and promoting interoperability and fair access to open data across the EU. On the other hand, open data strategies are principles and goals that countries want to achieve in the field of open data based on their open data policies. Furthermore, regional and local policies and strategies can complement national policies, focusing on the implementation and execution of open data practices tailored to regional governance structures. Table 2 presents an overview of how countries responded to the questions on this topic.

Table 2: Countries' responses to questions on open data policies and strategies

	Is there a national open data policy?	*Is there a national open data strategy?*	*Is there an open data policy/strategy at the regional or local level?*
EU-27	All 27 Member States (100 %) report having an open data policy.	27 Member States (100 %), with **Romania** as the latest addition, report having a stand-alone national open data strategy or relevant open-data-related objectives, actions and timelines incorporated within broader national policies.	20 Member States (74 %) report having an open data policy/strategy at the regional or local level. Four Member States (15 %) responded 'not applicable' due to the specific governance structures in place (e.g. having a small country size).
EFTA	**Iceland**, **Norway** and **Switzerland** all report having an open data policy.	**Norway** and **Switzerland** report having a national open data strategy, while **Iceland** reports that relevant open-data-related objectives are incorporated within its broader national policies and that work has begun on a general data strategy that will include open data.	**Iceland**, **Norway** and **Switzerland** report having an open data policy/strategy at the regional or local level. **Norway** emphasises that its national strategy is developed in collaboration with relevant local and regional authorities.
Candidate	**Albania**, **Bosnia and Herzegovina**, **Montenegro**, **North Macedonia**, **Serbia** and **Ukraine** all report having an open data policy.	**Albania**, **Montenegro**, **North Macedonia** and **Ukraine** report having a national open data strategy, while **Serbia** reports that relevant open-data-related objectives are incorporated within its broader national policies.	**Serbia** and **Ukraine** report having an open data policy/strategy at the regional or local level.

(Questions P1, P2 and P3)

In 2025, all countries participating in the ODM assessment report have a dedicated national open data policy. These policies often include a commitment to making public sector data openly available by default, treating official documents as public resources unless legitimate exceptions apply. Their legal basis is typically provided through instruments such as freedom of information / access to information laws, dedicated acts on public sector information or open data, or a combination of these.

There is also growing momentum to turn high-level regulatory principles into concrete, actionable strategies. Often, governments embed open data commitments within broader national frameworks on data governance, digitalisation, artificial intelligence (AI) and e-government. For example, in 2025 **Montenegro** has treated open data as a strategic priority across multiple strategies such as the digital

transformation strategy , public administration reform strategy and the smart specialisation strategy. Similarly, **Portugal** embeds open data in its national digital strategy, while **Hungary** locates open data objectives within its national AI strategy and national digitalisation strategy for 2022–2030.

In 2025, some local and regional open data strategies claim to align with national objectives while tailoring actions to local priorities. For instance, in **France**, many municipalities and regions have their own strategies, coordinated through Open Data France, a national association that supports harmonisation and provides tools for local governments. In **Lithuania**, some municipalities implement the mandatory national policy but customise their portals and datasets for local needs (e.g. Open Vilnius and Open Kaunas).

More countries also report that their local and regional open data strategies include partnerships with non-governmental stakeholders (e.g. academia, the private sector and civil society). For example, in **France**, the region of Rennes's Rudi project (involving an urban data interface) creates a shared governance model for data exchange among diverse stakeholders. Similarly, in **Spain**, the Madrid City Council's open government plan outlines engagement with professional reusers and researchers to maximise the value of open data.

Open data action plans

An open data action plan typically outlines the specific measures and steps that need to be implemented to achieve the goals set by the national open data strategy or policy. Table 3 presents an overview of how countries responded to the question on this topic.

Table 3: Countries' responses to the question on open data action plans

	Does the national strategy/policy include an action plan with measures to be implemented in the open data field?
EU-27	26 Member States (96 %), **all except Croatia**, report that their national strategy/policy includes an action plan with measures to be implemented in the open data field. **Romania** is the latest Member State to report that the national strategy/policy includes an action plan with measures to be implemented.
EFTA	**Iceland**, **Norway** and **Switzerland** report that their national strategy/policy includes an action plan with measures to be implemented in the open data field.
Candidate	**Albania**, **Bosnia and Herzegovina**, **Montenegro**, **North Macedonia**, **Serbia** and **Ukraine** all report that their national strategy/policy includes an action plan with measures to be implemented in the open data field.

(Question P4)

The most common focus of countries' action plans continues to be on publishing more accessible, reusable and regularly updated open data. Rather than simply increasing the number of open datasets, the emphasis of several countries has shifted towards publishing more dynamic, API-enabled data and embedding interoperability standards. For example, **Italy's** updated three-year plan for information technology in public administration sets clear objectives to increase the number of open dynamic datasets published through APIs and expand spatial datasets under the Infrastructure for Spatial Information in the European Community (Inspire) Directive, ensuring real-time accessibility and compliance with EU directives. **Lithuania** is implementing an API development and management model, integrating at least 376 information systems and registers, and populating a centralised metadata repository to enable automated interoperable data flows.

Additionally, accessibility is reinforced through portal modernisation and feature upgrades, such as in the case of **Spain's** overhaul of its national open data platform and **Slovenia's** redesign of its national open data portal, moving beyond simple cataloguing to user-centric functionality. Reusability is also treated more as a strategic priority, supported by financial instruments and agreements. **Lithuania's** EUR 66 million programme, **Spain's** four-year commitment to foster public sector information reuse and the data economy, and **Slovenia's** dedicated reuse fund to incentivise projects are recent examples of this trend.

Monitoring the usage and impact of open data also remains central, with more formal governance structures being cited in 2025. Namely, **Germany** reports submitting biennial progress reports to parliament and operates a dedicated monitoring process. Similarly, **Czechia** tracks implementation status through its 'digital Czech Republic' plan and **Romania** embeds milestones and indicators overseen by an interministerial committee.

Incentives for data publication and access

Stimulating the publishing of dynamic data and the uptake of APIs is one of the goals of the Open Data Directive. Dynamic data is data that changes asynchronously over time and is periodically updated as new information becomes available. Real-time data is data that changes and needs updating at very frequent intervals, in most cases several times a minute. On the other hand, citizen-generated data is the data that people or their organisations produce to directly monitor, demand or drive change on issues that affect them. Table 4 presents an overview of how countries responded to the questions on this topic.

Table 4: Countries' responses to questions on incentives for data publication and access

	Does the national strategy/policy outline measures to incentivise the publication of and access to real-time or dynamic data?	*Does the national strategy/policy outline measures to incentivise the publication of and access to citizen-generated data?*
EU-27	23 Member States (85 %) now report that their national strategy or policy includes measures to encourage the publication and access to real-time or dynamic data. **Croatia** has joined this group since the previous reporting period.	16 Member States (59 %) report that their national strategy/policy outlines measures to incentivise the publication of and access to citizen-generated data. **Lithuania** and **Romania** are the newest countries in this group.

	Does the national strategy/policy outline measures to incentivise the publication of and access to real-time or dynamic data?	*Does the national strategy/policy outline measures to incentivise the publication of and access to citizen-generated data?*
EFTA	**Iceland**, **Norway** and **Switzerland** report that their national strategy/policy outlines measures to incentivise the publication of and access to real-time or dynamic data.	None of the three participating EFTA countries reports that its national strategy/policy outlines measures to incentivise the publication of and access to citizen-generated data.
Candidate	**Albania**, **Montenegro**, **Serbia** and **Ukraine** report that their national strategy/policy outlines measures to incentivise the publication of and access to real-time or dynamic data.	**Ukraine** reports that its national strategy/policy outlines measures to incentivise the publication of and access to citizen-generated data.

(Questions P5 and P6)

Legal frameworks continue to play an important role in enabling the publication of and access to dynamic and/or real-time data and citizen-generated data. In terms of citizen-generated data, **France**, **Hungary**, **Portugal** and **Romania** report including citizen-generated data in national portals and strategies in 2025, signalling a shift beyond the 2024 emphasis on consent mechanisms towards structured onboarding and labelling of non-state data. **Romania's** new open data strategy embeds citizen contributions in public workflows, with a portal update enabling publication on the national platform. In **Hungary**, the national digital strategy prioritises expanding datasets with citizen-generated data and has led to the creation of the digital citizenship programme, which publishes regionally aggregated, non-identifiable datasets (e.g. education and welfare statistics) for public and commercial reuse.

Highlight from Ukraine – institutionalising citizen-generated data through business-to-business/business-to-government frameworks

Ukraine's draft open data strategy for 2025–2027 sets out measures to strengthen the publication and accessibility of citizen-generated data, positioning it as a key component of the national data ecosystem. A central element of the strategy is the creation of a regulatory framework for business-to-business and business-to-government data exchange, enabling structured, machine-readable data sharing between businesses and government. This approach aims to foster innovation, support the development of the digital economy and encourage the implementation of modern technological solutions.

Additionally, the strategy explores economic incentives, including the possibility of a special tax regime for enterprises developing products based on open data, to attract investment and stimulate start-up growth in the data economy.

Supporting the reuse of open data

The primary aims of the Open Data Directive are to encourage the opening of public sector information and to stimulate its reuse. Therefore, measures in the countries' open data strategies or policies that support the reuse of open data by the public and private sectors can support the downstream activities of making data openly available. Table 5 presents an overview of how countries responded to the questions on this topic.

Table 5: Countries' responses to questions on supporting the reuse of open data

	Does the national strategy/policy foster the discoverability of data from your country on data.europa.eu?	*Does the national strategy/policy outline measures to support the reuse of open data by the public sector?*	*Does the national strategy/policy outline measures to support the reuse of open data by the private sector?*
EU-27	23 Member States (85 %) report that their policies and strategies involve the publishing of data on data.europa.eu. However, the other Member States tend to make their data discoverable on data.europa.eu in practice, even though this is not explicitly stated in a policy or strategy.	26 Member States (96 %), **all except Belgium**, report that their open data policies and strategies outline measures to support the reuse of open data by the public sector.	24 Member States (89 %), **all except Bulgaria**, **Luxembourg** and the **Netherlands**, report that their open data policies and strategies outline measures to support the reuse of open data by the private sector. **Croatia** is the newest country to report this.
EFTA	**Norway** reports that its policies and strategies involve the publishing of data on data.europa.eu to foster discoverability.	**Iceland**, **Norway** and **Switzerland** all report that their open data policies and strategies outline measures to support the reuse of open data by the public sector.	**Iceland**, **Norway** and **Switzerland** all report that their open data policies and strategies outline measures to support the reuse of open data by the private sector.
Candidate	**Ukraine** reports that its policies and strategies involve the publishing of its national data on data.europa.eu to foster discoverability.	**Albania**, **Bosnia and Herzegovina**, **Montenegro**, **Serbia** and **Ukraine** report that their open data policies and strategies outline measures to support the reuse of open data by the public sector.	**Albania**, **Bosnia and Herzegovina**, **Montenegro**, **Serbia** and **Ukraine** report that their open data policies and strategies outline measures to support the reuse of open data by the private sector.

(Questions P7, P8 and P9)

A prominent trend in country responses about enhancing the reuse of open data by both the private and the public sectors is ensuring that open data is accessible and of high quality. In this regard, countries continue to invest in making open data technically reusable across administrations, by not only committing to common principles (e.g. findable, accessible, interoperable and reusable (FAIR)) but also building the infrastructure that enforces them. In 2025, **Czechia**, **France**, **Malta**, **Slovenia** and **Ukraine** report that they are deploying data exchange platforms, APIs and registers that enable seamless integration and reuse of open data in public sector operations. For example, **Malta** has implemented a data exchange platform to enable interoperability and data sharing between public administration entities, as part of its national strategy. In addition, **Slovenia** is upgrading its national open data portal with API capabilities, allowing public bodies to publish and reuse data more effectively. This is complemented by broader support for open data infrastructure across its ministries.

In terms of the private sector, **Austria**, **Italy**, **Norway**, **Portugal** and **Romania** report creating structured environments where multiple stakeholders such as the government, private companies and academia can securely share and experiment with open data. These environments often provide governance, technical infrastructure and processes that enable the co-development of solutions, testing of prototypes and exchange of knowledge in a controlled setting. For example, **Romania's** open data strategy introduces data spaces and 'living labs' as a way of creating safe environments for public, academic and private actors to collaborate on innovative projects. **Austria's** digital action plan outlines a data hub and data partnerships, offering structured collaboration channels for small and medium-sized enterprises and other stakeholders to leverage public sector data. Additionally, **Norway's** digitalisation strategy promotes collaboration between public authorities and industry associations to ensure efficient digital value chain integration and data sharing.

Countries continue to use training and capacity-building initiatives to improve data quality and reuse. In 2025, however, this trend shows a shift towards more specialised and role-specific training. Instead of broad awareness programmes, some countries are embedding technical skills into operational roles. For example, **Slovakia** offers practical SPARQL training for data stewards to query metadata, and **Slovenia** runs dedicated sessions for open data editors at the Administrative Academy of the Ministry of Public Administration. **Spain** integrates real open datasets into official courses for public employees, linking training directly to reuse scenarios. **Ukraine** goes further by targeting leadership with organisational and educational activities to embed open data into decision-making.

Highlight from Spain – the open government data initiative
To foster the reuse of open data within the public sector, **Spain** continuously showcases real-world applications and data-driven business models on its national open data platform. This virtual space now features 483 applications and 99 business models, with over 40 new solutions added in the past year. These examples serve as inspiration and guidance for public entities exploring the potential of open data. Explore the growing catalogue of applications developed using open data and examples of companies and organisations that have created innovative solutions using open data.

Data inventories

A data inventory is a comprehensive catalogue of the datasets held by an organisation and can be used to plan the opening of appropriate datasets. Data inventories can also include data collected by public bodies that cannot be published as open data (e.g. in relation to the European Data Governance Regulation (Regulation (EU) 2022/868)). Table 6 presents an overview of how countries responded to the questions on this topic.

Table 6: Countries' responses to questions on data inventories

	Do policies and strategies mandate that public bodies carry out and maintain a data inventory, whether at the national or local level?	*Do these data inventories include the data collected by public bodies that cannot be published as open data?*
EU-27	26 Member States (96 %), **all except** the **Netherlands**, report that their open data policy or strategy mandates that public bodies maintain a data inventory.	25 Member States (93 %), **all except** **Bulgaria** and the **Netherlands**, report that their data inventories include the data collected by public bodies that cannot be published as open data.
EFTA	**Norway** and **Switzerland** report that their open data policy or strategy mandates that public bodies maintain a data inventory.	**Norway** and **Switzerland** report that their data inventories include the data collected by public bodies that cannot be published as open data.
Candidate	**Albania**, **Bosnia and Herzegovina**, **Montenegro**, **North Macedonia** and **Ukraine** report that their open data policy or strategy mandates that public bodies maintain a data inventory.	**Albania**, **Bosnia and Herzegovina**, **Montenegro**, **North Macedonia** and **Ukraine** report that their data inventories include the data collected by public bodies that cannot be published as open data.

(Questions P10-a and P10-b)

National legislation, such as open data laws and freedom of information acts, continues to be the most common means to mandate the implementation and maintenance of data inventories. Several countries mandate that public bodies publish their data inventories on a centralised national portal, which serves as a single point of access for open data. Countries such as **France**, **Hungary**, **Norway** and **Spain** report that they have institutionalised roles such as designated data stewards to oversee the creation, maintenance and publication of data inventories. **Spain**, for example, has institutionalised local responsibility for data inventories through a set of standard rules issued by the Spanish Federation of Municipalities and Provinces. These rules require each local authority to maintain a structured inventory of datasets and information sources, with this task being assigned to designated staff who essentially act as local data stewards.

Data inventories across Europe are evolving from including only open data to being comprehensive registries that include all public sector datasets, even those that cannot be published openly. This shift is strongly driven by the Data Governance Act, which requires mechanisms for safe reuse of protected data. In line with the obligations set out in this act, countries have appointed or empowered competent authorities to oversee access to protected data under the act's framework. Many countries are

implementing methods of ensuring that protected datasets are discoverable. For example, **Lithuania** is building a metadata catalogue and a state data lake for protected datasets.

Highlight from Poland – hybrid model of data inventory publication
Poland's national open data portal serves as a central platform for publishing and accessing public sector datasets. At the national level, central public sector organisations are legally obliged to publish datasets on the portal, following structured publication schedules and API development plans outlined in the open data programme for 2021–2027. These schedules are monitored by open data officers and updated every six months. At the local level, participation is voluntary. Cities and municipalities are encouraged to develop annual schedules for opening selected datasets and may publish them either on the national open data portal or on their own open data portals. Gdańsk, Kraków, Poznań, Warsaw and Wrocław, for example, have their own open data portals. The national portal is designed to harvest datasets from these local portals to create a more unified data landscape. To support this integration, the Ministry of Digital Affairs has organised training programmes for local public sector employees, combining theoretical instruction on data openness with practical exercises on preparing and publishing datasets on the national open data portal. Several hundred employees were trained between 2023 and 2025, with additional workshops planned due to high demand.

Highlight from France – coordinated ministerial support for data inventories
France has developed a robust support system for data inventory creation through its interministerial digital transformation programme, Tech.Gouv, and the open data unit Etalab. Each ministry designates open data officers who collaborate with Etalab to identify, structure and publish their data inventories. Workshops are held to define key considerations, and ministries such as those of the economy, culture, agriculture and the armed forces have actively engaged in inventory development. These efforts are aligned with national strategies and prime ministerial directives, which require ministries to draft data roadmaps and create inventories for the national portal. The approach emphasises discoverability, reuse and strategic planning across government.

Prioritising high-value datasets

HVDs are datasets that hold significant potential for economic, social or environmental benefits when made openly available. Commission Implementing Regulation (EU) 2023/138, adopted in December 2022 and published in January 2023, lays down a list of specific HVDs and the arrangements for their publication and reuse. The ODM questionnaire included two questions to enquire about countries' progress with implementing this regulation. Table 7 presents an overview of how countries responded.

Table 7: Countries' responses to questions on implementing the EU regulation on HVDs

	Is your country applying Commission Implementing Regulation (EU) 2023/138 on HVDs?	*Have the public bodies in your country denoted relevant datasets as HVDs in their metadata?*
EU-27	All Member States (100 %) report that they are working towards applying the EU regulation on HVDs.	25 Member States (93 %) report that their public bodies with HVDs have denoted this in the datasets' metadata. The most recent additions are **Denmark**, **Spain**, **Malta** and **Romania**.

(Questions P11 and P12)

NB: Non-EU countries were not surveyed on this question as Commission Implementing Regulation (EU) 2023/138 on HVDs applies only to Member States.

On average, progress remains most advanced for **statistics** (82 %) and **geospatial** (79 %) datasets (Figure 3). While **company and company ownership** datasets (72 %) remain as one of the less mature categories, **meteorological** datasets are now reported as the least advanced category, a regression from previous years (70 %). The maturity of **mobility** datasets (75 %) has reportedly improved the most year-on-year.

Turning to the underlying requirements, the most significant progress is seen in terms of identifying and inventorying HVDs (82 %), followed by setting up new roles and workflows (79 %) and addressing legal barriers (76 %). Requirements related to technical progress score the lowest: metadata availability and quality (74 %), standardised means to structure, describe and access data (74 %), machine-readable formats via APIs (73 %) and bulk downloading (73 %). While this overall profile is the same as last year, with technical progress being less mature than legal and organisational progress, maturity scores for technical progress have improved more year-on-year than those for legal and organisational progress.

Denmark, **Estonia**, **France**, **Latvia**, **Lithuania** and **Finland** are highly mature in terms of their implementation of the HVD regulation, achieving a maturity score of 95 % or higher on average. On the other hand, **Bulgaria**, **Croatia** and **Hungary** report the least advancement in implementing the HVD regulation, with each Member State having a maturity score of less than 50 %.

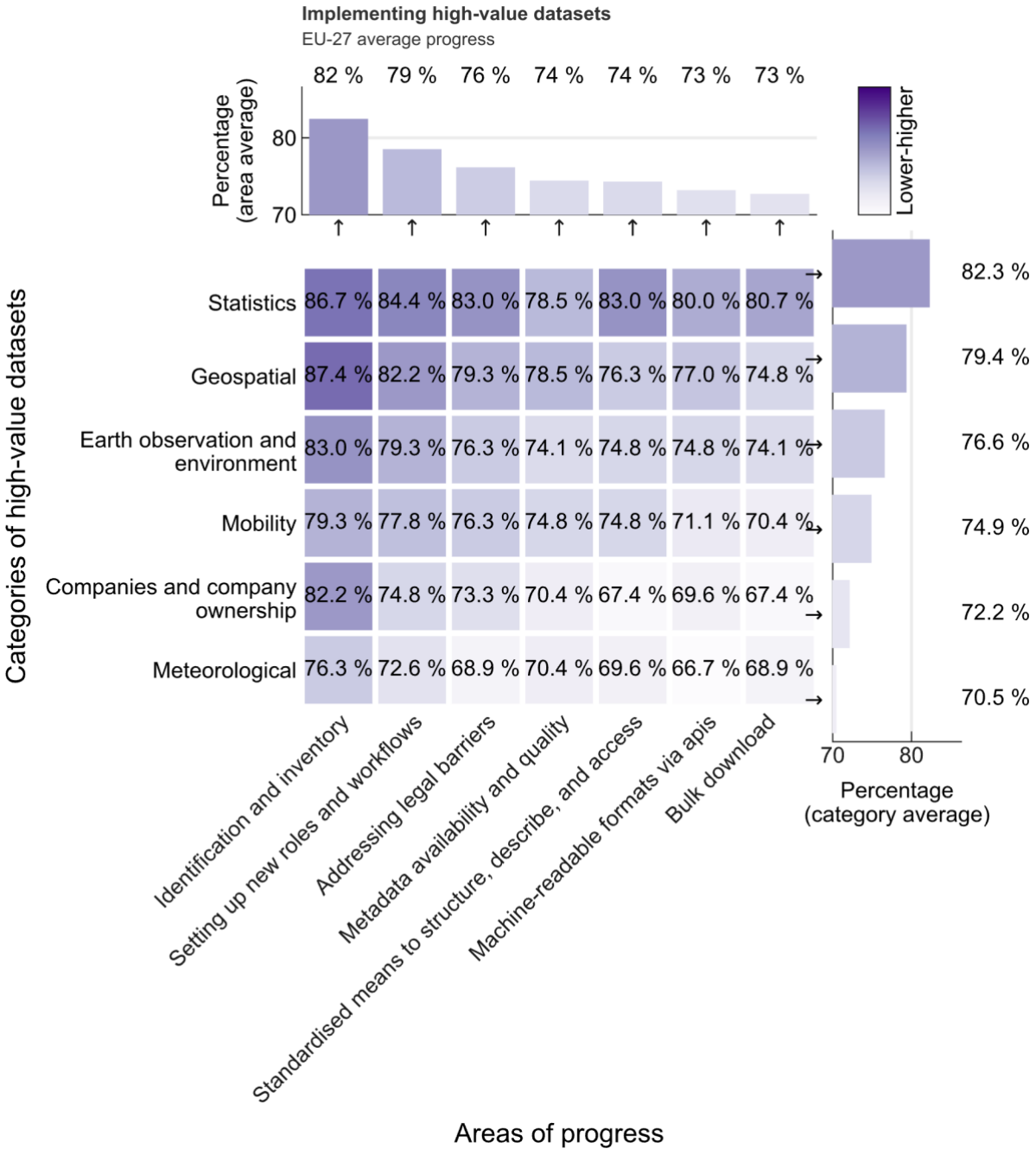

Figure 3: Average maturity scores of the six categories of HVD and seven areas of activity.

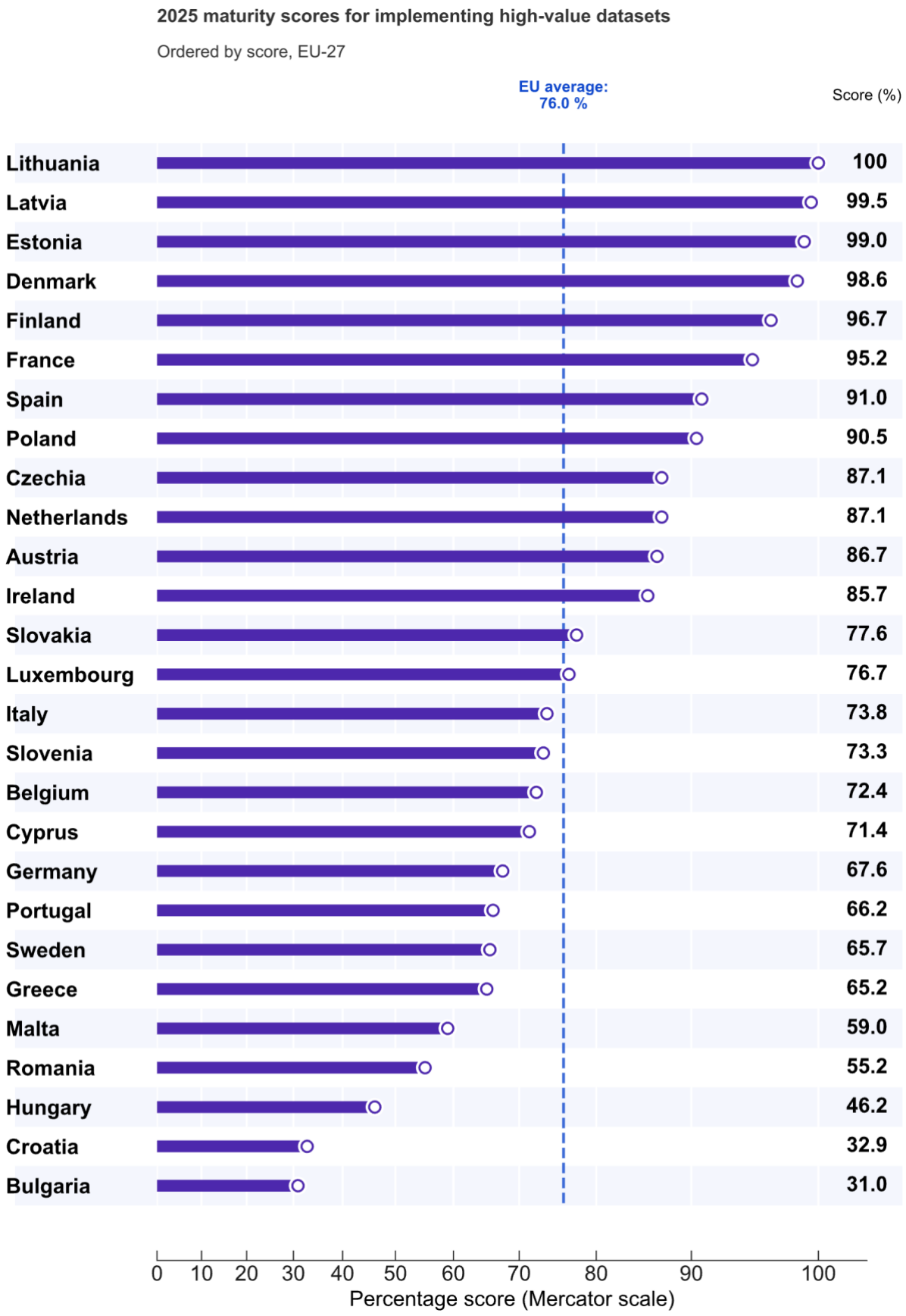

Figure 4: Fourteen Member States are at least equal to the EU average maturity for implementing the requirements on HVDs.

4.3. Governance of open data

This indicator evaluates the governance structures and operating models in place at the national, regional and local levels to support open data initiatives. This includes both the appointment of civil servants with a remit on open data and the exchange of knowledge and experiences within the public sector and between the public sector and open data reusers.

Governance structures

A governance structure for open data is the formal system or framework that ensures various open data stakeholders' participation, collaboration and inclusion. This framework helps to ensure that open data initiatives are inclusive, transparent and aligned with the needs of all stakeholders. Governance structures can be top-down, with coordinating power exercised by an established body, or enacted using a hybrid model, allowing for regional autonomy while maintaining central oversight. Either way, countries will often have mechanisms for engaging stakeholders within their governance systems. Table 8 presents an overview of how countries responded to the questions on this topic.

Table 8: Countries' responses to questions on governance structures

	Is there a governance structure in place that enables the participation and/or inclusion of various open data stakeholders?	*How would you classify the model used for governing open data in your country?*
EU-27	26 Member States (96 %), **all except Bulgaria**, report that their governance structures enable the participation and inclusion of various stakeholders in open data policies. **Croatia** is the most recent Member State to report this.	20 Member States (74 %) report using a hybrid model, combining elements of a top-down and a bottom-up approach. Seven Member States (26 %) report that they implement a top-down approach.
EFTA	**Iceland**, **Norway** and **Switzerland** all report that their governance structures enable the participation and inclusion of various stakeholders in open data policies.	**Iceland**, **Norway** and **Switzerland** all report using a hybrid model, combining elements of a top-down and a bottom-up approach.
Candidate	**Albania**, **Serbia** and **Ukraine** report that their governance structures enable the participation and inclusion of various stakeholders in open data policies.	**Albania**, **Bosnia and Herzegovina**, **Montenegro**, **North Macedonia**, **Serbia** and **Ukraine** all report using a hybrid model, combining elements of a top-down and a bottom-up approach.

(Questions P13 and P14)

Most countries report having a hybrid governance model, and this is typically characterised by a central authority orchestrating the ecosystem, while there are also participatory methods to include non-central actors (e.g. subnational governments, civil society, academia, the private sector). Examples from 2025 include **Lithuania**, which mandates that institutions respond to user requests logged on its national portal and empowers open data coordinators to liaise with local stakeholders.

Multistakeholder forums, such as boards, working groups and round tables, continue to be popular participatory governance mechanisms. These bodies bring together various open data stakeholders to identify needs and set agendas. In some cases, specialised subgroups are established to work on priority topics. For example, **Portugal's** Data Governance Technical Working Group has a subgroup on interoperability and secure sharing. Other countries have created working groups with different focuses. For example, **Switzerland** uses the Open Government Data forum and two operational working groups – one for legal matters and one for matters related to the national portal – under a specialist federal body to guide implementation of its open data master plan.

Local and regional governance structures

To ensure the effective publication and reuse of open data across a country, governance must be established not only at the national level but also at the subnational level. This entails national governments creating an enabling environment for subnational entities to thrive in their open data endeavours. Although structural and legal limitations might exist, national governments often provide technical, monetary and advisory support to local administrations for their open data initiatives. Table 9 presents an overview of how countries responded to the questions on this topic.

Table 9: Countries' responses to questions on local and regional governance structures

	Does the governance structure ensure that the local and regional open data initiatives are facilitated and supported at the national level?	*To what degree do local/regional public bodies conduct open data initiatives?*
EU-27	24 Member States (89 %), **all except Germany** and **Finland**, report that their governance structures ensure that local and regional open data initiatives are facilitated and supported nationally. **Belgium** reports that this is 'not applicable', since the federal level has no authority over open data projects at the regional level.	Ten Member States (37 %) report that all local/regional public bodies in their countries conduct open data initiatives, and eight Member States (30 %) report that the majority of local/regional public bodies do so.
EFTA	**Iceland** and **Norway** report that their governance structures ensure that local and regional open data initiatives are facilitated and supported nationally.	**Norway** and **Switzerland** report that the majority of the local/regional public bodies in their countries conduct open data initiatives. **Iceland** reports that only a few public bodies in its country conduct open data initiatives.
Candidate	**Serbia** and **Ukraine** report that their governance structures ensure that local and regional open data initiatives are facilitated and supported nationally.	**Ukraine** reports that all local/regional public bodies conduct open data initiatives. **Montenegro** and **Serbia** report that approximately half of the local/regional public bodies conduct open data initiatives, and **Albania**, **Bosnia and Herzegovina** and

		North Macedonia report that only a few public bodies do so.

(Questions P15 and P16)

In 2025, national entities provide support for local and regional open data initiatives in the following key ways.

- **Technical support.** Countries such as **Ireland**, **Spain**, **Lithuania**, **Poland** and **Sweden** note that having shared national platforms, catalogues and technical advisory channels helps lower the barrier for local bodies to publish, describe and federate datasets without having to build or maintain their own full stack. For example, **Lithuania** complements its open data portal with state-level integration work (forming a state data lake) that inventories municipal information systems and opens datasets. Municipal staff are also equipped with the Municipal DataLab application for analysis and decision support.
- **Capacity-building support.** In order to build local officials' skills in publishing, managing and using open data, countries such as **Czechia**, **Lithuania**, **Poland** and **Sweden** note that providing capacity-building support such as training, workshops, clinics, guidance materials and peer learning helps local bodies contribute to open data initiatives. For example, the **Swedish** Association of Local Authorities and Regions runs the Professions Network for Open and Shared Data (Oppnadataprofessionsnätverk), a collaborative forum for municipal and regional staff. The network offers seminars, practical workshops, and tailored guidance on applying Sweden's open data legislation and EU directives in local contexts. **Czechia's** national open data team regularly participates in regional conferences and educational events to upskill municipalities.
- **Advisory support.** Countries such as **Bulgaria**, **Ireland**, **Lithuania**, **Poland**, **Serbia** and **Spain** provide practical, hands-on assistance through staffed projects, structured programmes and reusable materials. For example, **Lithuania** and **Poland** use reusable materials, such as Poland's updated open data handbook and Lithuania's newsletters, and organise centrally managed training projects that embed national expertise into local practice.

Highlight from Ireland – Irish technical services framework

To help public bodies comply with the Open Data Directive, **Ireland** established the technical services framework, a streamlined mechanism for accessing specialised open data services. This framework acts as a pool of pre-qualified service providers for open data and data management, ensuring that public sector bodies can quickly obtain expert support without lengthy procurement processes.

Through a simple request form, authorities can access services such as:

- **data management** – audits, cataloguing, preparation, publication, maintenance and maturity assessment;
- **hosted open data platform solutions** – ready-to-use infrastructure for publishing and managing datasets;
- **consultancy services** – expert guidance on open data and data management practices.

By centralising technical expertise and simplifying service delivery, the framework accelerates compliance and reduces the burden on local and regional bodies, making open data implementation more efficient and sustainable.

Outlining open data roles and responsibilities

A network of open data officers serves as a system for communication and collaboration between the national open data team and various open data officers across different regions or sectors within the country. Having civil servants across public sector bodies with an official remit on open data can facilitate the process of making data open. Table 10 presents an overview of how countries responded to the questions on this topic.

Table 10: Countries' responses to questions on open data roles and responsibilities

	Is a document describing the responsibilities and governance structure of the national (and/or regional/local) open data team publicly available?	*Does the governance model include the appointment of official roles in civil services that are dedicated to open data (e.g. open data officers)?*
EU-27	25 Member States (93 %), with **Croatia** being the newest addition, report that they have a publicly available document describing the responsibilities and governance structure of the national (and/or regional/local) open data team. **Denmark** and **Sweden** do not report having such a document available.	25 Member States (93 %), **all except Belgium** and **Denmark**, report that their governance model includes the appointment of dedicated open data roles in the civil service.
EFTA	**Switzerland** reports that it has a publicly available document describing the responsibilities and governance structure of the national (and/or regional/local) open data team.	**Iceland** and **Switzerland** report that their governance models include the appointment of dedicated open data roles in the civil service.
Candidate	**Albania**, **Bosnia and Herzegovina**, **Montenegro**, **Serbia** and **Ukraine** report that they have a publicly available document describing the responsibilities and governance structure of the national (and/or regional/local) open data team. **North Macedonia** does not report having such a document available.	**Albania**, **Montenegro**, **North Macedonia**, **Serbia** and **Ukraine** report that their governance models include the appointment of dedicated open data roles in the civil service.

(Questions P17 and P19)

Official roles in the civil service that are dedicated to open data are reported in various forms. **Slovakia** and **Switzerland** report these roles to be data stewards, who manage metadata and ensure data quality, whereas **Austria**, **Bulgaria**, **Germany** and **Serbia** report that open data coordinators are responsible for publication workflows and compliance. In addition, **France** and **Malta** report appointing chief data officers who oversee broader data governance.

The trend of national laws requiring specific roles focused on open data continues in 2025. For example, Article 8(3) of **Bulgaria's** ordinance on the standard conditions for the reuse of public sector information mandates all public sector bodies to appoint designated staff members responsible for managing their organisation's profile on the open data portal. These individuals perform all core

functions associated with the role of an open data officer, including coordination with the national portal and the responsible national body.

Highlight from France – comprehensive governance model
France demonstrates a comprehensive governance model that embeds open data roles across all levels of government. At the national level, the General Data Administrator (Administrateur général des données) coordinates public data policy, sets strategic priorities and oversees a network of chief data officers in each ministry. At the ministerial level, chief data officers manage data policy (e.g. open data, quality and reuse) supported by Etalab (France's national open data and digital innovation unit), which runs the network of chief data officers. Some ministries also appoint open data officers to focus on dataset publication and act as intermediaries between Etalab and internal teams, while data stewards handle technical and organisational aspects of data publication. At the local level, each regional representative (*préfet*) designates a referent for data, algorithms and source codes to promote openness. Additionally, the Interministerial Digital Directorate, the French central government body responsible for steering France's digital transformation across all ministries and public administrations, coordinates a network of API managers to enable dynamic data access.

Network of open data teams, officers and reusers

Communication and collaboration between various stakeholders are important for fostering a functional open data ecosystem. A regular exchange of knowledge and experiences between stakeholders can play a significant role in enhancing the quality and accessibility of open data and in creating feedback loops for improving open data policies. Table 11 presents an overview of how countries responded to the questions on this topic.

Table 11: Countries' responses to questions on communication and collaboration between stakeholders

	Is there a regular exchange of knowledge or experiences between the national open data team and the team maintaining the national portal?	*Is there a regular exchange of knowledge or experiences between the national open data team and the wider network of open data officers in your country?*	*Is there a regular exchange of knowledge or experiences between public sector bodies (i.e. the providers) and open data reusers (e.g. academia, citizens and businesses)?*
EU-27	26 Member States (96 %), **all except Finland**, report that the national open data team and the team maintaining the national portal in their countries have regular exchanges.	All Member States (100 %) report that the national open data team and the wider network of open data officers in their countries have regular exchanges.	All Member States (100 %) report that public sector bodies and open data reusers in their countries regularly exchange knowledge and experiences.
EFTA	**Iceland**, **Norway** and **Switzerland** all report that the national open data team and the team maintaining the national portal in their countries have regular exchanges.	**Iceland**, **Norway** and **Switzerland** all report that the national open data team and the wider network of open data officers in their countries have regular exchanges.	**Iceland**, **Norway** and **Switzerland** all report that public sector bodies and open data reusers in their countries regularly exchange knowledge and experiences.

	Is there a regular exchange of knowledge or experiences between the national open data team and the team maintaining the national portal?	*Is there a regular exchange of knowledge or experiences between the national open data team and the wider network of open data officers in your country?*	*Is there a regular exchange of knowledge or experiences between public sector bodies (i.e. the providers) and open data reusers (e.g. academia, citizens and businesses)?*
Candidate	**Albania**, **Montenegro**, **North Macedonia**, **Serbia** and **Ukraine** report that the national open data team and the team maintaining the national portal in their countries have regular exchanges.	**Albania**, **Montenegro**, **Serbia** and **Ukraine** report that the national open data team and the wider network of open data officers in their countries have regular exchanges.	**Montenegro**, **Serbia** and **Ukraine** report that public sector bodies and open data reusers in their countries regularly exchange knowledge and experiences.

(Questions P18, P20 and P21)

Countries continue to report formalised groups that help structure collaboration as a method of ensuring regular exchange of knowledge between the national open data team and the team maintaining the national portal, in addition to their national network of open data officers. For example, **Germany's** reports leveraging its product board for multi-party coordination and **Lithuania's** Open Data Club connect core actors around portal and data-opening issues. **Austria** combines strategic and technical coordination through Cooperation Open Government Data Austria and specialist groups (Fachgruppe), while **Switzerland's** open government data working group Corstat provides a similar structure.

Forums also remain a widely used method for knowledge exchange in countries' open data ecosystems. Unlike one-way communication channels, these are interactive spaces that enable dialogue among various open data stakeholders. In 2025, forums are reported to take the form of online platforms (e.g. **Norway's** Datalandsbyen), conferences and hackathons (e.g. **Iceland's** conference on the Icelandic data ecosystem and **Slovenia's** hackathons), and specialised thematic sessions within broader events (e.g. **Portugal's** Interoperable Europe Roadshow).

Highlight from Ukraine – Data+ communication platform

The Data+ communication platform in **Ukraine** exemplifies an effective approach to ensuring regular exchange of knowledge and experiences between the national open data team and a broader network of open data officers. Established with the support of the Ministry of Digital Transformation, the platform fosters collaboration among government bodies, civil society, experts and data providers.

Throughout 2024, seven community meetings were organised to address critical topics such as legislative developments, technical challenges and strategic planning. Discussions included the first reading of the draft law on personal data protection, the implications of the draft law on access to electronic registers and issues related to verifying and publishing data from the Unified State Register of Addresses. The platform facilitated consultations on the open data development strategy for 2025–2027 and introduced a methodology for ranking cities by the maturity of their open data publication practices. It also delivered capacity-building initiatives, including an online training session on using artificial intelligence in the field of open data.

By combining regular stakeholder meetings, public consultations and targeted training, Data+ creates a structured environment for continuous dialogue and knowledge sharing.

4.4. Open data implementation

This indicator looks at the practical steps taken to turn open data strategies into action. It focuses on the support provided to data holders, including those managing real-time, geospatial and citizen-generated data, to help them publish datasets effectively. It also considers efforts to build open data literacy, both within public administrations and among the wider public, through targeted initiatives and capacity-building activities.

Data publication plans

Data publication plans – that is, specific workflows or internal data management and monitoring processes for the publication of datasets – play a key role in ensuring that datasets are published consistently and effectively. Table 12 presents an overview of how countries responded to the question on this topic.

Table 12: Countries' responses to the question on data publication plans

	Do data publication plans exist at the public body level?
EU-27	All Member States (100 %) report that they have publication plans for open data at the public body level.
EFTA	**Norway** and **Switzerland** report that they have publication plans for open data at the public body level.
Candidate	**Albania** and **Ukraine** report that they have publication plans for open data at the public body level.

(Question P22)

Most countries have established legal requirements that oblige public sector bodies to create and follow data publication plans. The publication of open data is often supported by centralised national platforms or geoportals, which offer structured workflows and procedures to guide the publication of such data in a consistent and coordinated manner.

Highlight from Lithuania – systematic approach to data publication

Lithuania has established a multilayered approach to data publication planning, which is coordinated primarily by the State Data Agency. The approach includes the following.

- **The national data-opening plan.** The State Data Agency prepares and publishes a national data-opening plan on the national open data portal, developed in coordination with relevant institutions and based on user-submitted requests for new or updated datasets. This process is formalised in the official data-opening procedure.
- **Institution-level planning.** Individual institutions also maintain their own data-opening plans. For example, the State Enterprise Centre of Registers, which manages key national registers, has published new open datasets as part of its strategy. Additionally, dataset-specific planning can be made visible on the national portal.
- **Inventorisation.** An overview of inventorisation and publication planning at the state information systems level is available via an interactive dashboard published by the State Data Agency.

Implementation plans and monitoring processes

Governments can benefit from setting up reliable processes that support the implementation of open data strategies and ensure policies stay relevant through regular updates. Table 13 presents an overview of how countries responded to the questions on this topic.

Table 13: Countries' responses to questions on implementation plans and monitoring processes

	Are there processes to ensure that the open data policies/strategy previously mentioned are implemented?	*Do you update your policy/strategy as appropriate to ensure its success, such as based on data collected for monitoring?*
EU-27	All Member States (100 %) report that they have processes to ensure that their open data policies and strategies are implemented.	22 Member States (81 %) report that they have procedures in place to update their policy/strategy as appropriate. **Germany**, **Greece** and **Malta** are the Member States that newly report this.
EFTA	**Iceland**, **Norway** and **Switzerland** all report that they have processes to ensure that their open data policies and strategies are implemented.	**Norway** and **Switzerland** report that they have procedures in place to update their policy/strategy as appropriate.
Candidate	**Albania**, **Montenegro**, **North Macedonia**, **Serbia** and **Ukraine** report that they have processes to ensure that their open data policies and strategies are implemented.	**Albania**, **Serbia** and **Ukraine** report that they have procedures in place to update their policy/strategy as appropriate.

(Questions P23 and P24)

The most frequently mentioned mechanism for ensuring the implementation of open data strategies and policies is regular progress monitoring. In many cases, the monitoring of progress is mandated by the open data strategies and policies themselves. On top of that, many countries also update their policy/strategy based on the latest insights and inputs provided by various ministries and institutions.

Highlight from Spain – annual evaluation and targeted action

Spain follows an annual evaluation cycle to guide the development and refinement of its open data initiatives. Each year, the results of a national questionnaire assessing the state of open data inform the priorities and actions for the following 12 months. In 2025, this process led to a series of targeted improvements and new resources aimed at enhancing both data publication and user engagement.

Key developments included the creation of implementation materials for Spain's new Data Catalogue Vocabulary Application Profile (DCAT-AP) (DCAT-AP-ES), helping data publishers transition to the updated specification. The Member State also introduced advanced data science exercises, such as building conversational AI agents using public data, to support more sophisticated reuse scenarios.

Spain continued to improve the usability of its national portal, with updates to navigation and user experience, and optimised guidelines for publishing high-quality data in formats such as comma-separated values (CSV) or via APIs. In response to user demand, new guides and reports were published, covering topics including portal deployment, exploratory data analysis and municipal innovation.

To further engage the public, Spain launched a podcast channel and developed infographics on open data applications in urban management, sustainability and geospatial techniques. These efforts reflect a commitment to continuous improvement, driven by feedback from users and data publishers, and supported by regular monitoring and strategic planning.

Monitoring charging practices relating to open data

Legal frameworks often define procedures to help public bodies understand when charging above marginal costs is allowed, and which entities are authorised to do so. Table 14 presents an overview of how countries responded to the question on this topic.

Table 14: Countries' responses to the question on monitoring charging practices

	Are there any processes in place to assess if public sector bodies are charging for data above the marginal costs?
EU-27	25 Member States (93 %), **all except Hungary** and **Sweden**, report that they implement processes to assess if public bodies charge above the marginal costs for the data they provide.
EFTA	**Iceland** and **Norway** report that they implement processes to assess if public bodies charge above the marginal costs for the data they provide.
Candidate	**Albania**, **Montenegro**, **Serbia** and **Ukraine** report that they implement processes to assess if public bodies charge above the marginal costs for the data they provide.

(Question P25)

Most countries have established clear legal frameworks that define when public bodies can charge for data and how fees are calculated. These rules often include transparency measures, such as publishing lists of authorised bodies, approved pricing methodologies and review schedules. For example, some countries require public bodies to notify a central authority before applying charges, while others, such as **Belgium** and **Austria**, involve advisory bodies or ministries in approving exceptions. In several cases, methodologies for determining prices are publicly available and subject to periodic review.

Enforcement mechanisms vary. Some countries, such as **Czechia** and **Spain**, allow users to report unjustified fees through catalogue feedback tools. In other countries, requesters must typically report overcharging to committees or oversight bodies. **Norway** is currently reviewing funding models as part of broader legislative reforms to align with EU directives. Meanwhile, countries such as **Serbia** prohibit charges altogether, reinforcing the principle of free access to open data.

Data literacy training and open data publication activities

Initiatives that support open data publication aim to help data holders make their information available in accessible formats. These efforts often include training programmes and capacity-building activities, which are frequently aligned with broader goals to strengthen civil servants' data skills. By integrating open data support into professional development, governments can ensure that public sector staff are prepared to manage data effectively and meet transparency objectives. Table 15 presents an overview of how countries responded to the questions on this topic.

Table 15: Countries' responses to questions on open data publication and data literacy training

	Are there any activities in place to assist data holders with publishing their data as open data?	*Is there a professional development or training p lan for civil servants working with data in your country?*
EU-27	All 27 Member States (100 %), with **Bulgaria** being the latest addition, have activities in place to assist data providers with their open data publication.	All 27 Member States (100 %), with **Malta** being the latest addition, report that they offer professional training to civil servants working with open data.

	Are there any activities in place to assist data holders with publishing their data as open data?	*Is there a professional development or training p lan for civil servants working with data in your country?*
EFTA	**Iceland**, **Norway** and **Switzerland** all report having activities in place to assist data providers with their open data publication.	**Iceland**, **Norway** and **Switzerland** all report offering professional training to civil servants working with open data.
Candidate	**Albania**, **Serbia** and **Ukraine** report having activities in place to assist data providers with their open data publication.	**Albania**, **Montenegro**, **Serbia** and **Ukraine** report that they offer professional training to civil servants working with open data.

(Questions P27 and P28)

Structured support and training for civil servants working with open data is a key component of national strategies in many countries. Professional development programmes are often delivered through national platforms or institutions, offering flexible learning formats such as video series (e.g. **Lithuania's** 27-part training), webinars (e.g. **Poland's** workshops for local authorities) and dedicated academies (e.g. **Ukraine's** Open Data Academy and Chief Digital Transformation Officer (CDTO) Campus). These initiatives aim to build long-term capacity and foster digital transformation across public administrations.

To assist data holders in publishing open data, countries provide a wide range of support services. These include technical consultations (e.g. **Spain's** multilevel support structure), legal and organisational guidance (e.g. the Open Data **France** team) and shared infrastructure such as metadata catalogues (e.g. in **Sweden**). Some countries also offer financial support (e.g. **Estonia**) or partner with external organisations to deliver specialised services (e.g. **Ireland's** collaboration with Derilinx). Designated open data officers or liaison roles are common, ensuring accountability and continuity in data publication efforts.

Highlight from Cyprus – onboarding support for public sector bodies

In **Cyprus**, a structured onboarding process helps public sector bodies prepare and publish their datasets on the national open data portal. The process begins with the assignment of an open data liaison officer, who then participates in a dedicated training programme. With guidance from the Open Data Team, public sector bodies develop a tailored data publication plan using provided templates and support materials. The data is then published gradually in accordance with this plan, while the Open Data Team monitors progress and prompts updates when needed. Public sector bodies are required to revise and resubmit their plans at least every two years, with most opting for annual updates. This cyclical approach ensures consistent engagement and alignment with open data goals.

4.5. Recommendations

Countries can use the following general advice to improve on the policy dimension of the ODM methodology. The recommendations are tailored to four levels of maturity, ranging from trendsetters to beginners.

Trendsetters

- Enhance and consolidate the open data ecosystems you support by developing thematic communities of providers and reusers. Continue to prioritise HVDs within the six specified categories, in line with the requirements.
- Steer the network of open data officers to enable data-driven policymaking at their level of government, delegating and decentralising monitoring activities. Maintain the connection between the national strategy and objectives and the needs of agencies and local authorities, with these needs expected to gain prominence over time.
- Work with training institutions to provide advanced open data courses and training, and tailor training curricula to cover more advanced topics. Such training can include guidance on compliance with open data laws and education on data literacy. Make such courses formally recognised and provide certification upon successful completion.

Fast-trackers

- Assist in the development of open data initiatives at the local and regional levels and seek to achieve better coordination with local and regional open data teams.
- Activate the network of open data officers and enable them to set up monitoring activities within their organisation (e.g. by developing plans for data publication and monitoring practices). Track progress against these plans and assist open data officers in alleviating barriers to data publication identified in their organisations.
- Ensure that existing open data courses and training materials are promoted and used. Cooperate with training organisations to develop new course offerings tailored to the needs of your national, regional and local administrations. Make such courses formally recognised and provide certification upon successful completion. Ensure that financial resources are allocated at all administrative levels to enable more civil servants to benefit from training.
- Focus on organising activities that better target the delivery of sustainable solutions. Move beyond creativity-stimulating competition formats (e.g. hackathons) to formats that provide opportunities for the medium- to long-term engagement of businesses. Ensure funding and political sponsorship (e.g. by having an organisation serve as a patron) for the winning ideas.

Followers

- Update the national strategy on open data to reflect technical and policy developments at the EU level, including on HVDs (Commission Implementing Regulation (EU) 2023/138) and the latest versions of the DCAT-AP such as release 3.0 of the main profile and its specific extensions such as DCAT-AP for HVDs and StatDCAT-AP, for statistical datasets.
- Set up a governance structure that accounts for the characteristics of your country. Engage potential reuse groups (e.g. data-gathering companies, research institutions, non-governmental organisations) in open data governance in your country. This will enable co-ownership around a common vision and buy-in for the actions of each sector.
- Develop a yearly plan for online activities (e.g. events, conferences) to promote open data. Focus on formats that encourage publication and reuse by both the public and private sectors.

Experiment with formats that both leverage creativity (e.g. hackathons) and enable the development of business opportunities for medium- to long-term engagements (e.g. data challenges).

- Encourage the network of open data liaison officers to set up data publication plans and monitor progress against these plans. Enable the open data officers to exchange knowledge and experiences between public sector bodies and with the broader network of reusers. Deepen the understanding within the network of open data officers of the benefits of open data reuse by the public sector.
- Ensure that existing open data courses and training materials are leveraged, and cooperate with public administrations and training organisations to develop open data training curricula for national, regional and local administrations. Enable such courses to be formally recognised and provide certification upon completion. Ensure that financial resources are allocated at all administrative levels to training activities for civil servants working with data.
- Enable meetings and engagement between reusers and publishers. Develop a deeper understanding of the demand side of open data and work with data providers to prioritise data publication in line with this demand.

Beginners

- Develop a national strategy for open data and align it with broader strategies at the national level (e.g. digital strategies and strategies for the modernisation of the public sector). Ensure the development of legal frameworks and ethical guidelines to govern the use of open data and generally safeguard sensitive and personal information.
- Rally support for the open data programme and political leadership within the top level of government. Showcase international research around the value of open data to emphasise the economic benefits of data exploitation. Use HVDs as a focal point.
- Establish a national-level team in charge of open data to ensure coordination of activities within the country and set up roadshows to increase understanding of the team's scope and activities among primary public administrations. Include all levels of government in this process.
- Organise a series of open data events at the national level and focus on engaging both data publishers and reusers in your country. Prioritise the promotion of reuse cases and best practices for data publication during such events.
- Set up relevant communication channels and assign contact people for data publication within public administrations (e.g. open data liaison officers). Maintain an active dialogue with data officers and enable regular exchanges of knowledge among them, focusing on efficient online channels and face-to-face meetings.
- Identify the primary data holders in the country and understand their main concerns and their perceived barriers to data publication. Take the first steps towards overcoming these barriers and unlocking the publication of data.
- Organise workshops and awareness-raising sessions with the primary data holders. Use materials already developed in other countries and at the European level for content and as a source of inspiration.

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