

REPORT

# An Analysis of Open Science Policies in Europe, v7

April 2021



## Table of Contents

1.	Introduction.....	2
2.	Executive summary.....	4
3.	International policy and Horizon Europe .....	4
4.	INFRAEOSC Projects.....	7
5.	National OS policies examined .....	10
6.	Country Profiles.....	22
6.1	Overview.....	22
6.2	Member states with existing national policies (12/27).....	26
	BELGIUM (BE).....	26
	CYPRUS (CY).....	27
	CZECH REPUBLIC (CZ).....	27
	FINLAND (FI).....	27
	FRANCE (FR).....	28
	IRELAND (IE).....	29
	ITALY (IT).....	30
	LITHUANIA (LT).....	30
	NETHERLANDS (NL).....	31
	SLOVENIA (SI).....	32
	SPAIN (ES).....	32
6.3	Member states with no national policy but which are active in this space (15/27).....	34
	AUSTRIA (AT).....	34
	BULGARIA (BG).....	34
	CROATIA (HR).....	34
	DENMARK (DK).....	35
	ESTONIA (EE).....	35
	GERMANY (DE).....	36
	GREECE (EL).....	36
	HUNGARY (HU).....	37
	LATVIA (LV).....	37
	LUXEMBOURG (LU).....	37
	MALTA (MT).....	37
	POLAND (PL).....	37
	PORTUGAL (PT).....	38
	ROMANIA (RO).....	38
6.4	Selected non-EU countries .....	39
	ICELAND (IS).....	39
	SERBIA (RS).....	40
	SWITZERLAND (CH).....	40
	UNITED KINGDOM (UK).....	41
7.	Looking forward.....	43
8.	Acknowledgements.....	43

## 1. Introduction

This Open Science policy update is the seventh in a series prepared in partnership between SPARC Europe and the Digital Curation Centre (DCC) and reflects changes in the European policy landscape since our last update was released in August 2020.<sup>1</sup>

This document presents an updated review of national Open Data and Open Science policies in Europe as of March 2021. As with previous updates, this report does not cover Open Access to publications policies but rather focuses on research data. It is important to note here that we considered national policies and also national laws, research plans and roadmaps, concordats and codes of research practice as part of this review. We concentrated on the twenty-seven EU member states, but we also considered relevant countries from the European Research Area, namely Iceland, Norway, Serbia, Switzerland and the UK. In this update we focus specifically on presenting and analysing national policies. National Funder Policies are listed separately in Table 3.

Based on work for the FAIRsFAIR Project<sup>2</sup>, we include a section in this report that presents a deeper analysis of the national policy documents.<sup>3</sup> This section analyses the policies against ten policy elements including: policy scope, data definition, mandates, exceptions, mentions of FAIR, DMPs, data citation, data availability statements, re-use, IP and licensing, and costs.<sup>4</sup> This does not analyse funder policies, which are increasingly under development as published in the recent policy report for FAIRsFAIR, however, this might be considered in future versions depending on feedback. The data collected for the deeper analysis is openly accessible from Zenodo.<sup>5</sup>

Continuing our approach of working collaboratively with the European research community to prepare these updates, we are particularly grateful to the OpenAIRE National Open Access Desks (NOADs) for their help in identifying relevant documents and initiatives and in particular for extremely helpful comments and pointers to documents which are not currently available in English or are works in progress and have not yet been publicised. This data has passed by the OpenAIRE NOADs for verification and this draft is available for further comment by the community.

Since the last update, Italy has released a National Open Science Plan together with a National Plan for Research. Over the past year we have seen nations focusing efforts on addressing the Covid-19 crisis and numerous Open Science and policy-related initiatives have been launched aimed at increasing immediate open access to publications, research data, and code. As regards international OS policy, numerous countries have also implemented the Open Data Directive and the European Commission issued its General Model Grant Agreement for Horizon Europe in February 2021.

National Open Science policies have also been a strong focus within a number of initiatives and projects associated with the implementation of the European Open Science Cloud (EOSC) and we outline a number of these in Section 4. Their focus is on assisting Member States and Associated Countries with EOSC readiness and, as part of this work, there are ongoing efforts to support policy harmonisation across Europe. These efforts may result in a number of new policies and/or policy updates over the next few years.

Summary of changes since version 6:

An overview of the EU Directive on Open Data and the Re-use of Public Sector Information (PSI Directive) and Horizon Europe data-sharing requirements: both of which will have continued influence on national Open Science policy development.

An update on the ongoing European Open Science Cloud (EOSC) policy-related activities among the European Commission supported INFRAEOSC 5b projects.

---

<sup>1</sup> SPARC Europe, & Digital Curation Centre. (2019, August 28). *An Analysis of Open Science Policies in Europe v6*. Zenodo. <https://doi.org/10.5281/zenodo.4005612>

<sup>2</sup> D3.1 FAIR Policy Landscape Analysis <http://doi.org/10.5281/zenodo.3558173>

<sup>3</sup> FAIRsFAIR Project: [www.fairsfair.eu](http://www.fairsfair.eu)

<sup>4</sup> This update employs a subset of the policy characterisation elements developed in the FAIRsFAIR project. <http://doi.org/10.5281/zenodo.3550544>

<sup>5</sup> Open Science Policies in Europe v5, 2020 Dataset <http://doi.org/10.5281/zenodo.3689437>

Updates of the following country profiles:

- Austrian entry updated
- Belgian entry updated
- Croatian entry updated
- Danish entry updated
- Dutch entry updated
- Italian entry updated
- Latvian entry updated
- Luxembourg entry updated
- Serbian entry updated
- Swiss entry updated
- UK entry was updated

The information held within this report is accurate to the best of DCC's knowledge as of March 2021. We will continue to investigate the open data policy landscape across Europe, updating this document periodically. It is a living document. If you are aware of existing policies or relevant national initiatives, or have corrections to share, please get in touch: [info@dcc.ac.uk](mailto:info@dcc.ac.uk)

## 2. Executive summary

As of March 2021, we count 14 national policies, of which 11 are those of EU member states (Belgium, Cyprus, Czech Republic, Finland, France, Ireland, Lithuania, The Netherlands, Slovenia and Slovakia and Spain). In the European Research Area, four non-EU members have national policies (Switzerland, Norway, Serbia and the UK).

To summarise changes since the previous update released in August 2020, no new national policies have been added, but as we present in section 5, several countries have progressed national level Open Science activities. As noted in section 3 of the previous version of this report,<sup>6</sup> there have been many examples of good practice around providing immediate open access to publications, data and code as a direct response to the COVID-19 crisis which has resulted in the development of multiple vaccines and therapies that are currently being rolled out in record time. In addition, the imminent deadline for implementation of the Directive on Open Data and the Re-use of Public Sector Information (PSI Directive) in Member States,<sup>7</sup> the ongoing development of the European Open Science Cloud (EOSC), and the publishing of the Horizon Europe Draft Grant Agreement and the first calls under Horizon Europe<sup>8</sup> are positive influences on the development or refinement of Open Science policies - both on national and local levels - in the year ahead. A brief summary of the Open Data Directive and Horizon Europe and the model Grant Agreement are provided in section three of this report. In version 6, we introduced a number of Horizon 2020 funded regional and thematic policy initiatives<sup>9</sup> aiming to help realise the vision of the European Open Science Cloud (EOSC). Section 4 provides a short update on the activities of these initiatives.

The results of our detailed analysis of national policy elements has revealed:

- About two thirds of national policies provide a definition for data
- Data sharing is mostly recommended rather than mandated
- Exceptions to data sharing are allowed in most policies yet few currently require formal justifications
- Under half of the policies refer to the FAIR principles explicitly while most do implicitly
- DMPs are required or recommended by most policies
- Expectations around data citation are not yet common in policies
- None of the policies require data availability statements
- IP is covered in the majority of policies
- Specific license types are included in about a third of policies

## 3. International policy and Horizon Europe

**The EU Directive on Open Data and the Re-use of Public Sector Information (PSI Directive)<sup>10</sup>** or Open Data Directive was adopted on 20 June 2019 and Member States should aim to have implemented the Directive by 16 July 2021. The Directive places an emphasis on enhancing the way that publicly funded research data should be made available, accessed and shared. The goals for change to this directive were to improve digital public services through a greater focus on data openness, greater use of AI and business support to tech start-ups among other things. Article 10 of the directive states that “Member States shall support the availability of research data by adopting national policies and relevant actions aiming at making publicly funded research data openly available (‘open access policies’) following the principle of ‘open by default’ and compatible with FAIR principles.” This directive applies to data that are created through publicly funded research as well as those that are generated in co-funded public and private sector projects. The directive follows the European Commission maxim of ‘as open as possible, as closed as necessary’ and accordingly allows for legitimate data sharing exceptions.

---

<sup>6</sup> SPARC Europe, & Digital Curation Centre. (2019, August 28). *An Analysis of Open Science Policies in Europe v6*. Zenodo. <https://doi.org/10.5281/zenodo.4005612>

<sup>7</sup> Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1561563110433&uri=CELEX:32019L1024>

<sup>8</sup> Horizon Europe – the next research and innovation programme: [https://ec.europa.eu/info/horizon-europe-next-research-and-innovation-framework-programme\\_en](https://ec.europa.eu/info/horizon-europe-next-research-and-innovation-framework-programme_en)

<sup>9</sup> EOSC Regional Projects: <https://www.eoscsecretariat.eu/communities/eosc-regional-projects>

<sup>10</sup> EU Directive on Open Data and the Re-use of Public Sector Information (PSI Directive) <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1561563110433&uri=CELEX:32019L1024>

The directive also introduces the concept of high-value datasets which are ‘subject to a separate set of rules ensuring their availability free of charge, in machine readable formats, provided via Application Programming Interfaces (APIs) and, where relevant, as bulk download’.<sup>11</sup> High-value data are defined as those ‘the re-use of which is associated with important benefits for society, the environment and the economy, in particular because of their suitability for the creation of value-added services, applications and new, high-quality and decent jobs, and of the number of potential beneficiaries of the value-added services and applications based on those dataset’.<sup>12</sup> The Commission has been working collaboratively to define a list of six thematic categories for high-value data which currently include geospatial; earth observation and the environment, meteorological, statistics, companies and company ownership and mobility.<sup>13</sup>

The European Commission has collected and shared information on how different Member States and European Economic Area (EEA) countries have implemented the directive.<sup>14</sup> As this valuable resource makes clear, there are different ways to implement the directive including the adoption of specific PSI re-use measures, through a combination of new measures specifically addressing re-use and legislation predating the Directive, and by adapting legislative frameworks for access to documents to include re-use of public sector information.

In addition to the Directive on Open Data and the Re-use of Public Sector Information (PSI Directive) the European Commission has also confirmed its commitment to facilitating Open Science in the requirements for participation in the upcoming **R&I Framework Programme Horizon Europe**<sup>15</sup> which runs from 2021-2027. The programme aims to mainstream ‘open science practices for improved quality and efficiency of R&I, and active engagement of society’.<sup>16</sup> The General Model Grant Agreement Draft was published on 25 Feb 2021 and sets out specific grant requirements for beneficiaries.<sup>17</sup> Under Horizon Europe, participants will be required to:

- Establish and regularly update a Data Management Plan
- Deposit data in a trusted repository and provide open access through it
- CC BY or CC 0 (or equivalent) license required to open data
- Apply exceptions to open access (duly justified in the DMP; legitimate interests or constraints);
- Provide information via the repository about any other research output or any other tools and instruments needed to re-use or validate the data;
- Ensure that metadata is open under CC0 or equivalent license and are in line with the FAIR principles, including grant information, licensing terms, and PIDs);
- Calls may, in addition, require beneficiaries to provide (digital or physical) access to data or other results to validate scientific publications;
- In the case of a public emergency, beneficiaries must – if requested – immediately deposit any research output in a repository and make it open access under a CC BY licence, a Public Domain Dedication (CC 0) or equivalent.<sup>18</sup>

Under Horizon Europe there is a shift from open research data to research data management<sup>19</sup> which reflects the fact that not all data can be shared openly and reinforces the maxim ‘as open as possible, as closed as necessary’. As with Horizon 2020, costs associated with RDM (for example data storage, processing and preservation) remain eligible. To support this vision, the European Commission will provide dedicated support to open science policy actions, including its new Open

---

<sup>11</sup> European Commission website <https://digital-strategy.ec.europa.eu/en/policies/open-data-0>

<sup>12</sup> See Article 2: Definitions of the directive

<sup>13</sup> See Annex 1 of the directive

<sup>14</sup> Implementation of the Public Sector Information Directive available from <https://digital-strategy.ec.europa.eu/en/policies/public-sector-information-directive>

<sup>15</sup> Horizon Europe [https://ec.europa.eu/info/horizon-europe-next-research-and-innovation-framework-programme\\_en](https://ec.europa.eu/info/horizon-europe-next-research-and-innovation-framework-programme_en)

<sup>16</sup> European Commission presentation ‘Horizon Europe - Investing to shape our future’ March 19, 2021

[https://ec.europa.eu/info/sites/info/files/research\\_and\\_innovation/funding/presentations/ec\\_rtd\\_he-investing-to-shape-our-future.pdf](https://ec.europa.eu/info/sites/info/files/research_and_innovation/funding/presentations/ec_rtd_he-investing-to-shape-our-future.pdf)

<sup>17</sup> General Model Grant Agreement, Horizon Europe (HORIZON) Euratom Research and Training Programme (EURATOM), [https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/agr-contr/general-mga\\_horizon-euratom\\_en.pdf](https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/agr-contr/general-mga_horizon-euratom_en.pdf), p 108-109

<sup>18</sup> *ibid*

<sup>19</sup> *ibid*

Research Europe publishing platform to allow for the sharing of outputs.<sup>20</sup> This platform was launched on 24 March 2021.<sup>21</sup> The platform requires open access to research data supporting articles under the principle ‘as open as possible, as closed as necessary’.<sup>22</sup> The European Commission also encourages modernising recognition and reward systems on national levels which are crucial to the success of OA and OS. To this end, the inclusion of assessment of open science practices as part of Horizon Europe award criteria for proposal evaluation is a welcome addition.

The European Commission’s commitment to Open Science is also clearly stated in the new EC communication on the ERA which was published at the end of September 2020. The **ERA for Research and Innovation** sets out the plan for building a common scientific and technological area. To increase the excellence and efficiency of the European R&I system, it states that traditional ‘single market’ elements of the ERA, including the implementation of open science, needs to accelerate. It emphasises Open Science’s value in reinforcing excellence and trust in science by making research more reusable and reproducible: thereby facilitating research quality, efficiency and innovation.

It highlights the development of the European Open Science Cloud (EOSC) as a common, federated, European framework for openly sharing research data and services and sees it grow into a trusted European research and innovation space and platform for various sectors. It also reports the launch of its Open Research Europe publishing platform seamlessly integrating publicly funded research into a single European data space.

The new ERA also underlines the importance of incentivising collaboration and sharing results to stimulate multidisciplinary research. It points out that a multi-stakeholder approach will be necessary to co-ordinate and synchronise reform in the research assessment system at institutional, regional, national and international levels.

The Commission announces that it will:

“9. Launch, via the Horizon Europe Programme, a platform of peer-reviewed open access publishing; analyse authors’ rights to enable sharing of publicly funded peer-reviewed articles without restriction; ensure a European Open Science Cloud that is offering findable, accessible, interoperable and reusable research data and services (Web of FAIR); and incentivise open science practices by improving the research assessment system.”<sup>23</sup>

---

<sup>20</sup> Open Research Europe: <https://open-research-europe.ec.europa.eu/>

<sup>21</sup> Commission launches open access publishing platform for scientific papers  
[https://ec.europa.eu/commission/presscorner/detail/en/IP\\_21\\_1262](https://ec.europa.eu/commission/presscorner/detail/en/IP_21_1262)

<sup>22</sup> Open Research Europe policies, Data availability. <https://open-research-europe.ec.europa.eu/about/policies/>

<sup>23</sup> *ibid*

#### 4. INFRAEOSC Projects

To support the implementation of the European Open Science Cloud (EOSC), the European Commission has supported a number of collaborative efforts at the regional level to increase up-take for the European Open Science Cloud (EOSC).<sup>24</sup> Five projects have been funded under the INFRAEOSC 5b call – four regional initiatives and one thematic project targeting the photon and neutron community. The projects all run from 2019-2022. Below, we briefly describe each of the five projects and provide a summary of their policy-related activities and objectives. The summaries below are distilled from a collection of position papers that were released in March/April 2021.

**EOSC-Nordic**<sup>25</sup> is a regional project with 24 partners and aims to foster the take-up of EOSC by coordinating relevant initiatives taking place in Finland, Sweden, Norway, Denmark, Iceland, Estonia, Latvia, and Lithuania. A key area of activity within the project is to support harmonisation at the policy and service-provisioning level in compliance with EOSC agreed standards and practices. EOSC-Nordic includes a policy-oriented work package and aims to engage with policymakers, funding agencies and governance bodies to raise awareness of EOSC and its potential benefits. In relation to policies, EOSC Nordic will:

- assess the landscape<sup>26</sup> and support EOSC and regional efforts to harmonise policies on research data
- provide advice on removing legal restrictions from creating EOSC in the Nordic and Baltic context
- facilitate discussion around the future of EOSC in the Nordic and Baltic context.
- provide guidelines to provide sustainable funding levels for Open Science implementation by including FAIR and Open Science requirements on future funding programmes

**EOSC-Pillar**<sup>27</sup> aims to coordinate data infrastructures and services across Austria, Belgium, France, Germany, and Italy with an overall objective of establishing a federation model for open science services. Policy is a key area for EOSC Pillar and the project has:

- performed a study into the legal and policy state of the art in the involved countries, which highlights commonalities to be leveraged and identifies gaps or challenges to be tackled in order to help harmonise and improve the national policies and strategies related to FAIR data and Open Science.
- drafted recommendations for policymakers concerning the rules and procedures with respect to legal issues regarding open access and open data as well as for services management, with a focus on the management of service level agreements.
- initiated a blueprint and guidelines for service providers and researchers in EOSC-Pillar on legal aspects of service and data provisioning in a European and international context<sup>28</sup>.

**EOSC-Synergy**<sup>29</sup> brings together Spain, Portugal, the UK, Czech Republic, Slovakia, Poland, the Netherlands, and Germany to support policy harmonisation and the federation of national research e-Infrastructures, scientific data and thematic services. A key aim for the project is to bridge the gap between national initiatives and EOSC. Policy harmonisation is a key objective for the project and EOSC-Synergy will:

- support the alignment of national policies and practices including access to services, data protection and privacy, infrastructure security, leveraging public investments, alignment of practices and service management
- with FAIRsFAIR, work towards the implementation of a FAIR data baseline, including self-assessment capabilities
- implement a skills development framework that promotes EOSC adoption by the research communities including training and adoption of common interfaces, standards and best practices.

---

<sup>24</sup> European Open Science Cloud: <https://ec.europa.eu/research/openscience/index.cfm?pg=open-science-cloud>

<sup>25</sup> <https://www.eosc-nordic.eu/>

<sup>26</sup> <https://www.eosc-nordic.eu/insights-from-the-national-initiatives-survey/>

<sup>27</sup> <https://www.eosc-pillar.eu/>

<sup>28</sup> Foggetti, Nadina, Gerin Laslier, Maryvonne, Di Giorgio, Sara, Haile Gebreyesus, Netsanet, Müller, Sabine, van Nieuwerburgh, Inge, ... Van Wezel, Jos. (2021). EOSC-Pillar D4.1 Legal and Policy Framework and Federation Blueprint. <https://doi.org/10.5281/zenodo.4486609>

<sup>29</sup> <https://www.eosc-synergy.eu/>



**NI4OS**<sup>30</sup> represents a partnership of 15 Member States and Associated Countries across southeast Europe and will provide technical and policy support for the on-boarding of service providers into EOSC. NI4OS will:

- based on an initial landscape assessment<sup>31</sup>, support harmonisation of governance structures on the national level and their involvement in pan-European governance
- support on-boarding of service providers to EOSC<sup>32</sup>
- define rewarding and incentive mechanisms for ORDM and FAIR that can be used by different stakeholders<sup>33</sup>
- develop several tools that support ORDM and FAIR. In particular NI4OS-Europe has developed
  - a Licence Clearance Tool (LCT) which facilitates and automates the clearance of rights (copyright) for resources before they are publicly released under an open license and/or stored at a publicly trusted FAIR repository<sup>34</sup>
  - the EOSC RoP Legal & Ethics Compliance Tool (RoLECT), which provides an aggregated guided assessment for EOSC RoP focusing on legal and ethical aspects of compliance<sup>35</sup>
  - the Repository Policy Generator Tool (RePol), which is a web-tool that guides through the process of defining a repository policy<sup>36</sup>
- deliver training activities that build capacity on technical, organisational and legal aspects to support FAIR and Open Research Data Management (ORDM)<sup>37</sup>.

**ExPaNDS**<sup>38</sup> is a collaboration between 10 national Photon and Neutron Research Infrastructures (PaN RIs) as well as EGI. ExPaNDS aims to deliver standardised, interoperable, and integrated data sources and data analysis services for national PaN RIs. Work in the project includes a number of data policy-related activities:

- a landscaping analysis<sup>39</sup> of the current state of data policy at ExPaNDS partner RIs
- the development of an extended data policy framework for national PaN RIs (draft version published Sep 2020)<sup>40</sup>
- in-depth consultations with ExPaNDS partners on the draft data policy framework, leading to the publication of a final version of the framework in Aug 2021
- a review of national research data policy landscapes relevant to ExPaNDS partner RIs
- an evaluation of how recent FAIRsFAIR Data Policy Recommendations<sup>41</sup> relate to the PaN context and their translation, where applicable, into PaN-specific recommendations
- collaboration with the PaNOSC<sup>42</sup> project on data policy related outcomes<sup>43</sup>

---

<sup>30</sup> <https://ni4os.eu/>

<sup>31</sup> <https://doi.org/10.5281/zenodo.4486609>

<sup>32</sup> Anastas Mishev, & Dusan Vudragovic. (2020, February 28). Best practices for on-boarding and related policies. Zenodo. <http://doi.org/10.5281/zenodo.3736143>

<sup>33</sup> <https://doi.org/10.5281/zenodo.3736147>

<sup>34</sup> <https://lct.ni4os.eu>

<sup>35</sup> <https://rolelect.ni4os.eu>

<sup>36</sup> <https://repol.ni4os.eu/>

<sup>37</sup> An event in Moldova is scheduled in September 2020 <https://ni4os.eu/2020/08/25/ni4os-europe-national-capacity-building-training-event-in-the-domain-of-open-science-for-moldova-registration-is-open/>

<sup>38</sup> <https://expands.eu/>

<sup>39</sup> Ashton, A., Da Graca Ramos, S., Matthews, B. et al. (2019). ExPaNDS data landscaping survey. <https://doi.org/10.5281/zenodo.3673811>

<sup>40</sup> Matthews, B., McBirnie, A., Vukolov, A. et al. (2020). Draft extended data policy framework for Photon and Neutron RIs. <https://doi.org/10.5281/zenodo.4014811>

<sup>41</sup> Davidson, J., Grootveld, M., Whyte, A. et al. (2020). Policy Enhancement Recommendations. <https://doi.org/10.5281/zenodo.3686901>

<sup>42</sup> The Photon and Neutron Open Science Cloud (PaNOSC) is a European project for making FAIR data a reality in 6 [pan-]European Research Infrastructures (RIs), developing and providing services for scientific data and connecting these to the European Open Science Cloud (EOSC). <https://www.panosc.eu>

<sup>43</sup> Gotz, A., Perrin, J-F., Fangohr, H. et al. (2020). PaNOSC FAIR Research Data Policy framework. <https://doi.org/10.5281/zenodo.3862701>

Under INFRAEOSC 5c, the **FAIRsFAIR**<sup>44</sup> project will supply practical solutions for the use of the FAIR data principles throughout the research data life cycle. A key emphasis for the project is on fostering FAIR data culture and the uptake of good practices in making data FAIR. In relation to policies, FAIRsFAIR carried out an analysis of data policies at various levels (nation, funder, organisation) to identify elements that support or hinder FAIR data practice.<sup>45</sup> Based on this analysis, FAIRsFAIR developed a set of 22 recommendations on how policies might be enhanced to enable the production and reuse of FAIR data.<sup>46</sup> Following an open call for policy support that closed in February 2021<sup>47</sup>, FAIRsFAIR will work with selected policy makers to review their policies against the recommendations and provide guidance on where improvements may be needed.

To support coordination across these projects and to feed into the broader work of the EOSC Landscape Working Group<sup>48</sup>, the **National Policy and Governance Task Force**<sup>49</sup> and **Landscaping Task Force**<sup>50</sup> have been established including representatives from all of the INFRAEOSC projects. Through the FAIRsFAIR project, SPARC Europe and DCC are members of both of these Task Forces. The two Task Forces collaborated to deliver a workshop held in May 2020 as part of EOSChub Week<sup>51</sup> to discuss potential EOSC readiness indicators at the country level. Following the workshop, there have been two iterations of a working proposal for living indicators - including the existence of Open Science policies - to monitor MS progress towards EOSC readiness<sup>52</sup>. Through EOSC co-creation funding, a dashboard for monitoring these indicators is currently being designed as a prototype. As these living indicators are formally defined and agreed, there will be areas where current policies could be made more explicit to support future EOSC readiness assessments. However, ongoing assessment of Open Science policy content will require community agreement on which policy elements should be monitored and how.

The ongoing work of these projects and coordinating initiatives should ensure that new and existing policies can be better aligned to support EOSC participation and enable FAIR data. SPARC Europe and DCC will continue to review the outcomes and ensure that they are fed into future Open Science policy updates as relevant.

---

<sup>44</sup> <https://www.fairsfair.eu/>

<sup>45</sup> <https://doi.org/10.5281/zenodo.3558172>

<sup>46</sup> <https://fairsfair.eu/policy-enhancement-recommendations>

<sup>47</sup> <https://fairsfair.eu/form/open-call-policy-enhancement-support>

<sup>48</sup> <https://www.eoscsecretariat.eu/working-groups/landscape-working-group>

<sup>49</sup> <https://www.eoscsecretariat.eu/news-opinion/working-together-eosc-collaboration-agreement>

<sup>50</sup> <https://eoscsecretariat.eu/working-groups/landscape-working-group>

<sup>51</sup> <https://www.eosc-hub.eu/eosc-hub-week-2020/agenda/national-policy-developments-supporting-eosc-implementation>

<sup>52</sup> Arvola, Maijastiina, Beckmann, Volker, Budroni, Paolo, Castelli, Donatella, Cavalli, Valentino, Davidson, Joy, Van Wezel, Jos. (2021, January 20). Second Working Proposal for Living Indicators to Monitor MS Progresses Towards EOSC Readiness. Zenodo. <http://doi.org/10.5281/zenodo.4452799>

## 5. National OS policies examined

In this section, we present a summary of recent policy activities at the Member State and relevant country level. Starting with our analysis of Open Science Policies v5 which was released in February 2020, we introduced a more structured approach to analysing the content of the policies to better support comparison. To this end, we reviewed a range of national Open Science policies<sup>53</sup> against eleven policy elements: scope, data definition, mandates, exceptions, mentions of FAIR, DMPs, data citation, data availability statements, re-use, IP and licensing, and costs. The analysis of policy content against this set of policy elements enables us to highlight areas where further alignment would be advised across countries as well as to share examples of good practices for policymakers. The policies reviewed are generally national collaborative policies, government plans, frameworks or strategies; we do not include research funder policies in this analysis. There are however indications of on-going activity across MS<sup>54</sup>. The national profiles in this section are presented as correct, to the best of our knowledge, of the state of affairs in each country in March 2021.

### 5.1 Policy scope

The majority of national policies studied address both Open Access to publications and research data in one combined policy. These include policies of the Czech Republic, Cyprus, the Netherlands, Ireland, Finland and Serbia. The *Norwegian National Strategy on Access to and Sharing of Research Data*, however, is purely dedicated to research data as is the UK's *Concordat on Open Research Data*.<sup>55,56</sup>

Other policies have wider scopes, including the French *National Plan for Open Science* policy which, aside from OA to publications and research data, addresses the development and preservation of software and commitments for the Open Government Partnership (OGP).<sup>57</sup> The Slovak Republic also aligns its policy to the OGP. This is, therefore, more unique in scope since it is an OGP action plan.<sup>58</sup> For example, it addresses Open Education and Open Science, Government Open to Dialogue, Open Information (Open Government data), and Open Justice.

The *White Paper for a Swiss Information Provisioning and Processing Infrastructure 2020* addresses another type of scope since it primarily addresses research infrastructure as a whole, with data management one of its foci amongst others including ID management, e-publishing, e-learning, cloud computing and others.<sup>59</sup> Infrastructure is also addressed by the Irish Framework.<sup>60</sup>

---

<sup>53</sup> Fourteen policy documents were reviewed for this section. Twelve policy documents were from MS including Cyprus, Czech Republic (2 national level policy documents), Finland, France, Ireland, Netherlands, Serbia, Slovakia, Slovenia, and Spain. Three documents were from Associated Countries including Norway, Switzerland, and the UK.

<sup>54</sup> As noted in the introduction sections to this report, Italy has introduced a national plan since our last report 'An Analysis of Open Science Policies in Europe v6'. However, the policy documents are currently available only in Italian and as such we have not been able to include them in the analysis of policy content. Accordingly, the tables presented in section 5 are unchanged from those presented in An Analysis of Open Science Policies in Europe v6. Zenodo.

<https://doi.org/10.5281/zenodo.4005612>

<sup>55</sup> Norway: *National Strategy on Access to and Sharing of Research Data*,

[https://www.regjeringen.no/contentassets/3a0ceea1c9b4611a1b86fc5616abde7/en-gb/pdfs/national-strategy-on-access\\_summary.pdf](https://www.regjeringen.no/contentassets/3a0ceea1c9b4611a1b86fc5616abde7/en-gb/pdfs/national-strategy-on-access_summary.pdf)

<sup>56</sup> UK: *Concordat on Open Research Data*, <https://www.ukri.org/files/legacy/documents/concordatonopenresearchdata-pdf/>

<sup>57</sup> French *National Plan for Open Science*, 2018, <https://www.ouvri.lascience.fr/national-plan-for-open-science-4th-july-2018/>

<sup>58</sup> Slovak Republic: *The Open Government Partnership National Action Plan of the Slovak Republic 2020 – 2021*, [https://www.opengovpartnership.org/wp-content/uploads/2019/12/Slovakia\\_Action-Plan\\_2019-2021\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/12/Slovakia_Action-Plan_2019-2021_EN.pdf)

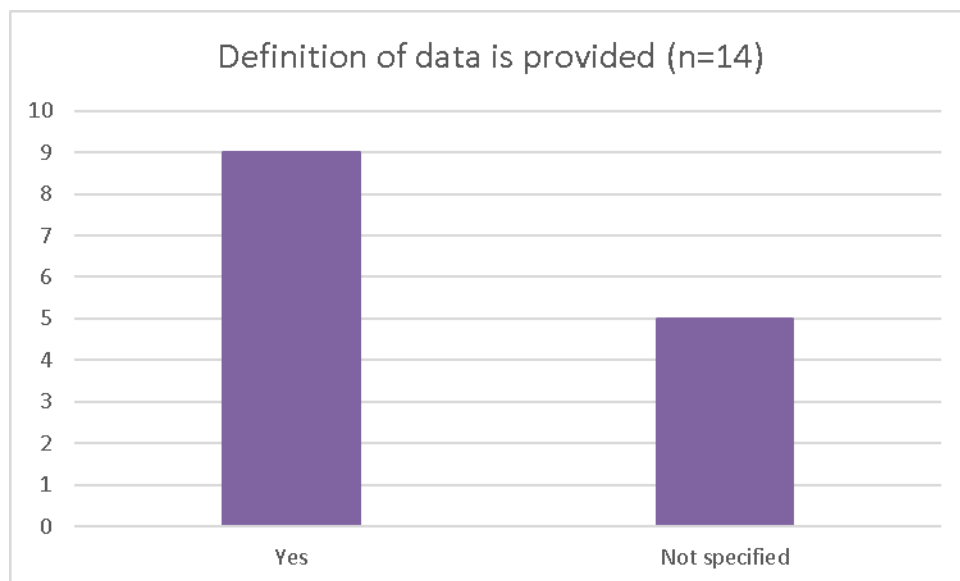
<sup>59</sup> Switzerland: *White Paper for a Swiss Information Provisioning and Processing Infrastructure 2020*, [https://www.swissuniversities.ch/fileadmin/swissuniversities/Dokumente/Organisation/SUK-P/SUK\\_P-2/WhitePaper\\_V1.1-EN.pdf](https://www.swissuniversities.ch/fileadmin/swissuniversities/Dokumente/Organisation/SUK-P/SUK_P-2/WhitePaper_V1.1-EN.pdf)

<sup>60</sup> Ireland: *National Framework on the Transition to an Open Research Environment*, 2019, [http://norf-ireland.net/wp-content/uploads/2019/07/NORF\\_Framework\\_10\\_July\\_2019-2.pdf](http://norf-ireland.net/wp-content/uploads/2019/07/NORF_Framework_10_July_2019-2.pdf)

## 5.2 Data definition

A clear data definition is critical for effective policy implementation. It is important for policymakers to define what sorts of outputs are covered by the term data and which of these they expect researchers should - or are recommended to - make available.

Figure 1. Number of policies that provide a definition of data.



The majority of the national policies studied for this report provide a definition for research data although they are not always well aligned, which brings complexity to the understanding that researchers have on what is required if moving to a new country.

Two national policies provide particular clarity to researchers on what is intended with respect to research data that should be shared. The French *National Plan for Open Science* provides a very clear yet concise definition:

*“Research data: Factual records (figures, texts, images, sounds, videos, etc.) used as primary sources for research and which are generally accepted by the scientific community as being necessary to validate research results.”*<sup>61</sup>

The *National Policy of the Republic of Cyprus for Open Access to Scientific Information* also provides a clear definition that provides slightly more detail:

*“Science Data is the primary information, namely the data or numbers which were collected and are considered as a basis for reflection, discussion or calculation in order to carry out a scientific research. Examples of scientific data include statistical data, results of experiments, measurements, observations resulting from field research, survey results, recordings of interviews and images, with emphasis on data available at digital form.”*<sup>62</sup>

The Finnish Action Programme also specifies what is not included in the definition, i.e. physical resources, which can be very helpful for providing further clarity on what is *not* required. The Finnish Action Programme describes three research data

<sup>61</sup> France: *National Plan for Open Science*, 2018, p. 10

<sup>62</sup> Cyprus: *The National Policy of the Republic of Cyprus for Open Access to Scientific Information*, 2016, p. 4  
<http://opensciency.ucy.ac.cy/wp-content/uploads/2019/09/FINAL-EN-National-Policy-for-Open-Access-to-Scientific-Information.pdf>

types in more detail: cumulative, permanent and public data, which is helpful to show the range of data that should be considered at different stages of the research lifecycle.<sup>63</sup>

### 5.3 Mandates

The majority of national policies studied do not mandate or require open access to research data so far but rather suggest or recommend this practice.

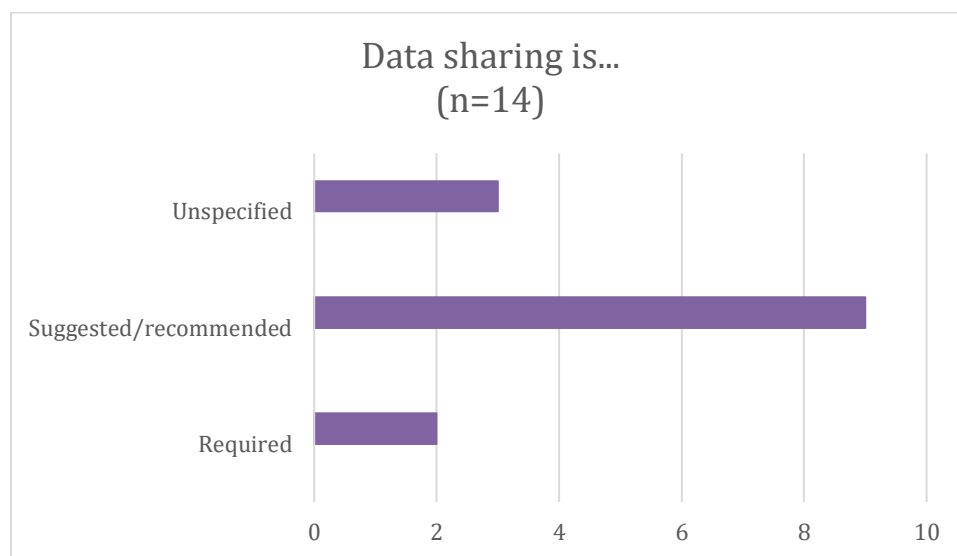


Figure 2. Number of policy mandates related to data sharing.

Two examples of those who do require data sharing include the Norwegian *National Strategy on Access to and Sharing of Research Data* and the Slovenian *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020* with its pilot programme which allows opt-outs. The French *National Plan Open Science* does not yet require data sharing but has plans to introduce this mandate.<sup>64 65 66</sup> Most of the other policies recommend or suggest data sharing providing more ambitions, frameworks, strategies and principles for working with research data where requirements are less prescriptive.

<sup>63</sup> Finland: *Open Science and data - Action Programme for the Finnish Scholarly Community*, p. 6  
[http://www.doria.fi/bitstream/handle/10024/164174/UNIFI\\_Open\\_Science\\_and\\_Data\\_Action\\_Programme.pdf?sequence=1&isAllowed=y](http://www.doria.fi/bitstream/handle/10024/164174/UNIFI_Open_Science_and_Data_Action_Programme.pdf?sequence=1&isAllowed=y)

<sup>64</sup> Norway: *National Strategy on Access to and Sharing of Research Data*, p. 6

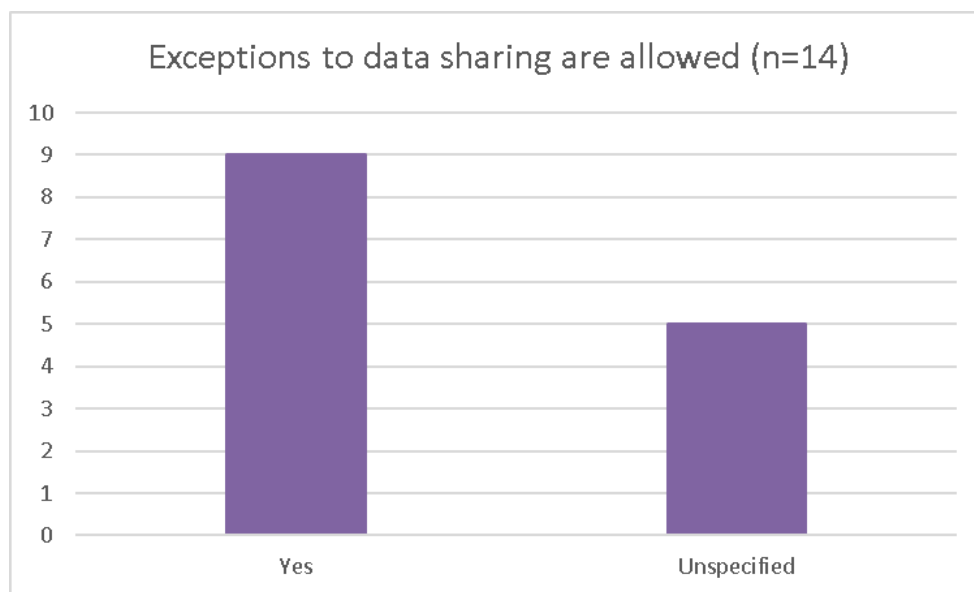
<sup>65</sup> Slovenia: *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020*, 2015, p. 20  
<https://www.gov.si/assets/ministrstva/MIZS/Dokumenti/ZNANOST/Strategije/National-strategy-of-open-access-to-scientific-publications-and-research-data-in-Slovenia-2015-2020.pdf>

<sup>66</sup> France: *National Plan for Open Science*, 2018, p. 6

#### 5.4 Exceptions

To make research data as open as possible but as closed as necessary, the majority of national policies allow exceptions to sharing data.

Figure 3. Number of policies that allow exceptions to data sharing.



Most policies allow legitimate exceptions to data sharing where data relates to national security, or where there are issues relating to confidentiality, privacy, intellectual property rights, and trade secrets. A few policies provide further information which provide greater clarity on what is expected, which others might consider when revising or developing new research data policy. For example, the Slovenian policy text on data sharing exceptions is succinct, and states that if data cannot be made available, its associated metadata should be made available making clear what data are available and where.

*“If access to research data is limited because of the legitimate exemptions, then at least openly accessible metadata have to be prepared for the catalogue of a thematic data centre that specify where and under which conditions the research data is available.”<sup>67</sup>*

Slovenia is currently running a pilot programme on Open Access to Scientific Publications and Research Data which clearly specifies which circumstances allow for opting-out. The policy draws directly from the Horizon 2020 European Commission Open Access policy to ensure alignment.<sup>68</sup>

*“Exemptions from the default fully open access have to be exactly defined and founded, e.g. because of the national security, the protection of personal data and the intellectual property rights of private co-funders. Legal and ethical aspects for open access have to be verified. If access to research data is limited because of the legitimate exemptions, then at least openly accessible metadata have to be prepared for the catalogue of a thematic data centre that specify where and under which conditions the research data is available.”<sup>69</sup>*

The UK’s *Concordat on Open Research Data* includes an extensive section on exceptions to data sharing.<sup>70</sup> The Concordat makes exceptions its second principle:

<sup>67</sup> Slovenia: *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020*, 2015, p. 6

<sup>68</sup> *Guidelines to the Rules on Open Access to Scientific Publications and Open Access to Research Data in Horizon 2020*, European Commission, 2017

<sup>69</sup> *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020*, 2015, p 6

<sup>70</sup> UK: *Concordat on Open Research Data*, p. 9

*“There are sound reasons why the openness of research data may need to be restricted but any restrictions must be justified and justifiable.”*

The Concordat calls for governance arrangements to be put in place for personal data protection to safeguard privacy and confidentiality and makes clear that access to data should “be proportionate to the level of risk associated with the particular data holding”.<sup>71</sup> When making data available, one is advised to regard “legal, regulatory and ethical requirements – including applicable data protection laws and relevant codes on research ethics and research integrity” an element that is rarely mentioned in other policies reviewed for this report. The Concordat also refers to the challenge of sharing open research data that might be in conflict with the interests of companies or third-party data providers who collaborate with research institutions and universities. It suggests developing protocols on whether, when, and how certain commercially sensitive data may be made openly accessible; ensuring that there is “an appropriate balance between openness and commercial incentives” so as to nurture innovation and collaborations between academia and industry while making as much of the resulting data as possible accessible for reuse. Furthermore, the Concordat states that a valid reason for restricting data access comes into play when the costs of preserving or supplying data are disproportionately large.

The Norwegian policy states that certain data – though closed for legitimate reasons at one point in time – may be made available at a later point in time. It also states that certain closed data may be available to certain users provided they meet clearly stated access criteria.<sup>72</sup> This approach demonstrates that closed access can be temporary and that controlled access options should be considered where open access is not feasible.

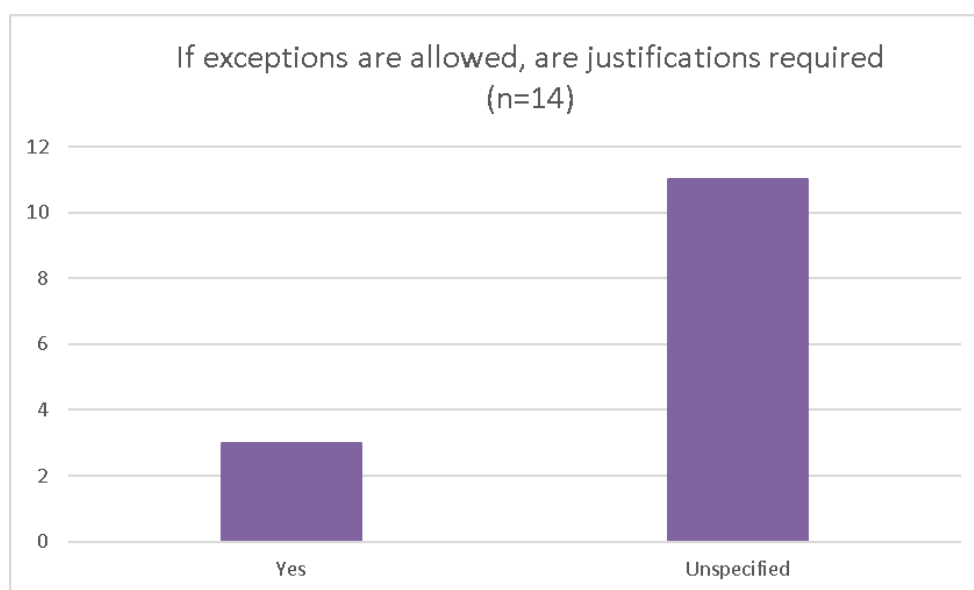


Figure 4. Number of policies that require justifications for not sharing data.

<sup>71</sup> Ibid

<sup>72</sup> Norway: *National Strategy on Access to and Sharing of Research Data*, p. 6

Justifications for data not sharing data are required by just three of the policies studied. The UK *Concordat on Open Research Data*, the *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020* and by the *National Strategy on Open Access to Scientific Information of the Czech Republic for 2017–2020*.<sup>73 74 75</sup>

The UK *Concordat on Open Research Data*, in its second principle, states that:

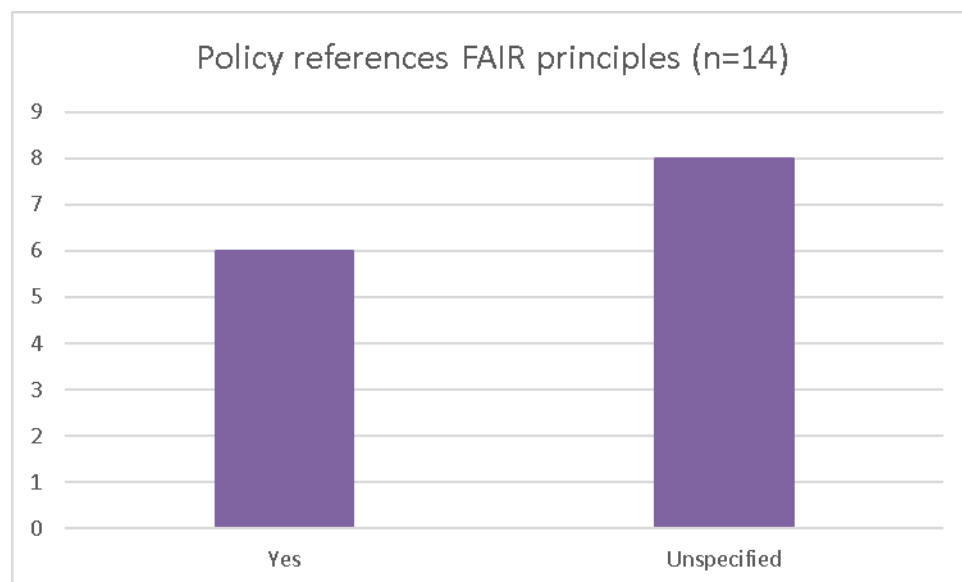
*“constraints on openness must not be applied on a blanket basis but should be justified and justifiable case by case. Research organisations or individual researchers withholding data must therefore consider carefully the grounds on which they are acting and be prepared to justify their actions.”*<sup>76</sup>

This approach helps deter those from easily opting-out of sharing research data without sound reasons. As noted, this is not yet standard practice but highly advisable to foster a culture where data-sharing becomes standard practice.

### 5.5 Mentions of FAIR

Requiring FAIR data is increasingly gaining ground in Europe. Nevertheless, as at March 2021, only six of the identified national OS policies mention FAIR explicitly. These include the policies from the Netherlands, France, the UK, Finland, Spain and the recent Irish *National Framework on the Transition to an Open Research Environment*.<sup>77</sup>

Figure 5. Number of policies that reference FAIR.



Others meanwhile refer to elements of the FAIR principles without mentioning them explicitly. For example, the Slovakian policy inserts Open Science into an Open Government Partnership Action Plan (Slovak Republic).<sup>78</sup> In its definition, it specifies that data “must be accessible, easy to understand and work with them must be possible without constraints (technical and licensing)” which supports the majority of the FAIR principles without naming them explicitly. It is advisable that policies in future refer to FAIR specifically to better promote a culture of FAIR practice.

<sup>73</sup> UK: *Concordat on Open Research Data*, p. 9

<sup>74</sup> *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020*, 2015, p. 6

<sup>75</sup> *National Strategy on Open Access to Scientific Information of the Czech Republic for 2017–2020*

<sup>76</sup> UK: *Concordat on Open Research Data*, p. 10

<sup>77</sup> Ireland: *National Framework on the Transition to an Open Research Environment*, 2019, [http://norf-ireland.net/wp-content/uploads/2019/07/NORF\\_Framework\\_10\\_July\\_2019-2.pdf](http://norf-ireland.net/wp-content/uploads/2019/07/NORF_Framework_10_July_2019-2.pdf)

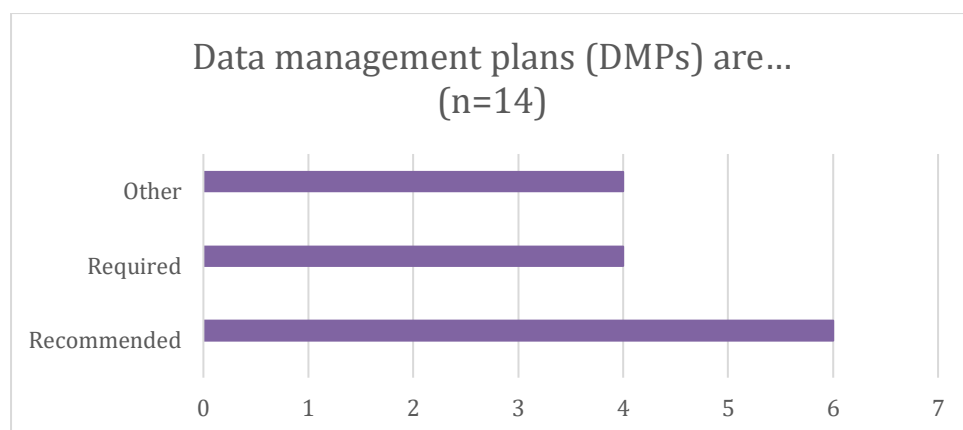
<sup>78</sup> Slovak Republic: *The Open Government Partnership National Action Plan of the Slovak Republic 2017 – 2019*, p. 7, footnote 7



## 5.6 DMPs

As at March 2021, four of the selected national policies require data management plans (DMPs). These include the French *National Plan for Open Science*, the *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020*, the Irish *National Framework on the Transition to an Open Research Environment* and the Norwegian *National Strategy on Access to and Sharing of Research Data*.<sup>79 80 81</sup> Most other national policies studied recommend rather than require DMPs. Requiring DMPs is good practice as developing outline plans at the outset of new research and updating them over the life of the project helps to ensure that risks can be mitigated, and challenges overcome.

Figure 6. Number of policy mandates for DMPs.



The timing of developing the DMP varies across policies. Of those with requirements or recommendations, two policies request DMPs be created at the pre-award stage (*The Open Government Partnership National Action Plan of the Slovak Republic 2017 – 2019* and *the UK Concordat on Open Research Data*). One policy request that DMPs are generated at the post-award stage (the Norwegian *National Strategy on Access to and Sharing of Research Data* policy). The *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015 – 2020* does not specify when the DMP should be prepared.<sup>82 83</sup> No policies specifically call for the sharing of DMPs throughout the research process as some funders are.

<sup>79</sup> France: *National Plan for Open Science*, 2018, p. 6

<sup>80</sup> Slovenia: *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020*, 2015, p. 19

<sup>81</sup> Ireland: *National Framework on the Transition to an Open Research Environment*, 2019, p. 8

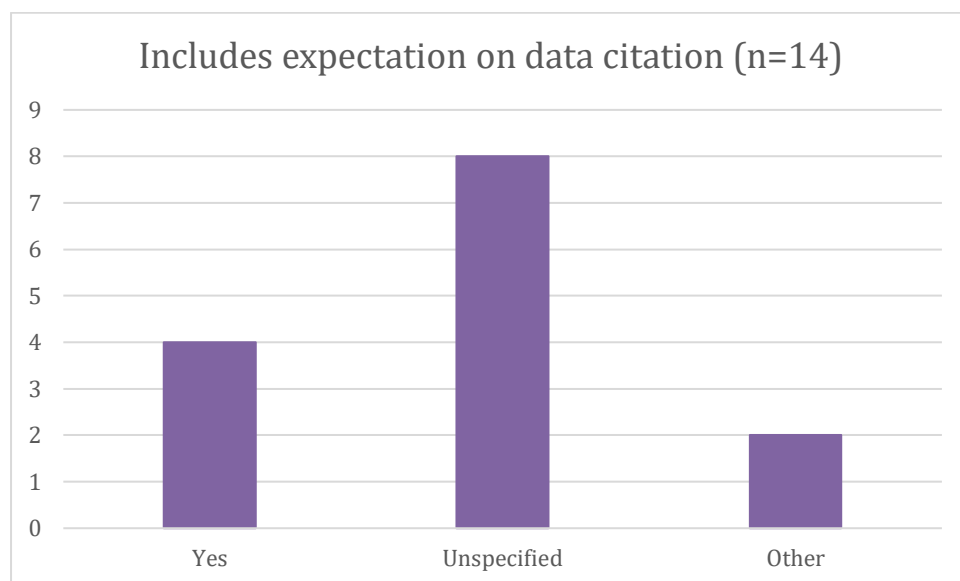
<sup>82</sup> Norway: *National Strategy on Access to and Sharing of Research Data*, p. 4

<sup>83</sup> Slovenia: *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015 – 2020*, 2015, p. 19

## 5.7 Data citation

Data is a valuable output of the research process. To progress the recognition of data and other research outputs including software as legitimate research outputs in their own right, it is vital that the formal acknowledgment of the creator(s) is encouraged by all stakeholders (national policies, funding bodies, publishers and research performing organisations), and then in a standardised way. Standards for data citation are necessary to ensure that citations can be easily aggregated as a more varied collection of research outputs are considered worthy of appraisal as part of the research evaluation process.

Figure 7. Number of policies that have expectations on data citation.



Four policies include an expectation on data citation including the UK’s *Concordat on Open Research Data*, the *Norwegian National Strategy on Access to and Sharing of Research Data*, the *Irish National Framework on the Transition to an Open Research Environment* and the *White Paper for a Swiss Information Provisioning and Processing Infrastructure 2020*.<sup>84 85 86</sup> Ireland’s policy makes the case most succinctly:

*“A robust citation mechanism for referencing data is necessary for research validation and to make data findable and accessible.”<sup>88</sup>*

The UK’s *Concordat on Open Research Data* underlines the importance of data citation and acknowledging data creators and requires data to be cited although it does not provide details on how this should be done. The *Open Government Partnership National Action Plan of the Slovak Republic 2017 – 2019* does include specific information on the importance of using persistent identifiers for researchers and outputs (specifically ORCID and DataCite<sup>89</sup>) which is essential for standardised citation practice.

The UK Concordat also makes the case for data citation in the research evaluation process, which is key for embedding data sharing data in the research process. The example below shows good practice that other policymakers may wish to emulate.

<sup>84</sup> UK: *Concordat on Open Research Data*, p. 5, 7, 12, 13, 16

<sup>85</sup> Norway: the *Norwegian National Strategy on Access to and Sharing of Research Data*, p. 7

<sup>86</sup> *National Framework on the Transition to an Open Research Environment*, 2019, p.

<sup>87</sup> *White Paper for a Swiss Information Provisioning and Processing Infrastructure 2020*, p.

<sup>88</sup> Ireland: *National Framework on the Transition to an Open Research Environment*, 2019, p. 7

<sup>89</sup> Slovak Republic: *The Open Government Partnership National Action Plan of the Slovak Republic 2017 – 2019*, p. 16-17

*“Production of open research data should be acknowledged formally as a legitimate output of the research process and should be recognised as such by employers, research funders and others in contributing to an individual’s professional profile in relation to promotion, research assessment and research funding decisions. Such formal recognition should be accompanied by the development and use of responsible metrics that allow the collection and tracking of data use and impact. In general, data citations should be accorded appropriate importance in the scholarly record relative to citations of other research objects, such as publications.”<sup>90</sup>*

The Open Science and data - Action Programme for the Finnish Scholarly Community goes one step further and refers to a data citation roadmap that was developed in 2018.<sup>91 92</sup>

### 5.8 Data availability statements

None of the policies reviewed currently require data availability statements to be included in research publications.

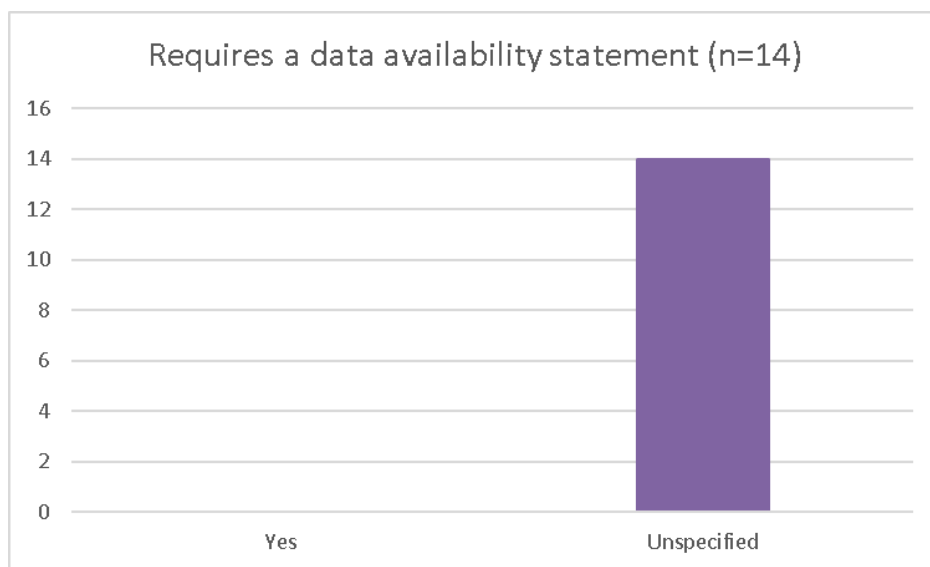


Figure 8. Number of policies that require data availability statements.

This is unfortunate as providing a clear link between the publication and the underlying data is crucial for supporting reproducibility and re-use. Requiring data availability statements stimulates researchers to provide concrete information on where and under what conditions data can be accessed. A growing number of publishers now require data availability statements to enable substantiation of written results against the underlying data. National policies should consider endorsing the inclusion of data availability statements in research publications as part of good research practice.

<sup>90</sup> UK: *Concordat on Open Research Data*, p. 13

<sup>91</sup> Finland: *Open Science and data - Action Programme for the Finnish Scholarly Community*, p. 7

<sup>92</sup> Laine, H (ed.) 2018, *Tracing Data - Data Citation Roadmap for Finland*. Helsinki, Finland: Finnish Committee for Research Data. <http://urn.fi/URN:NBN:fi-fe201804106446>

### 5.9 Re-use, IP and licensing

Stimulating data re-use saves time, increases potential for collaboration, enhances the return on investment for research activities, increases the impact of research funding, and accelerates the pace of discovery. Many of the policies reviewed do aim to stimulate data re-use including the Netherlands, Norway, Slovenia, Slovak Republic, and the UK.

The Dutch policy makes data re-use one of its key ambitions:

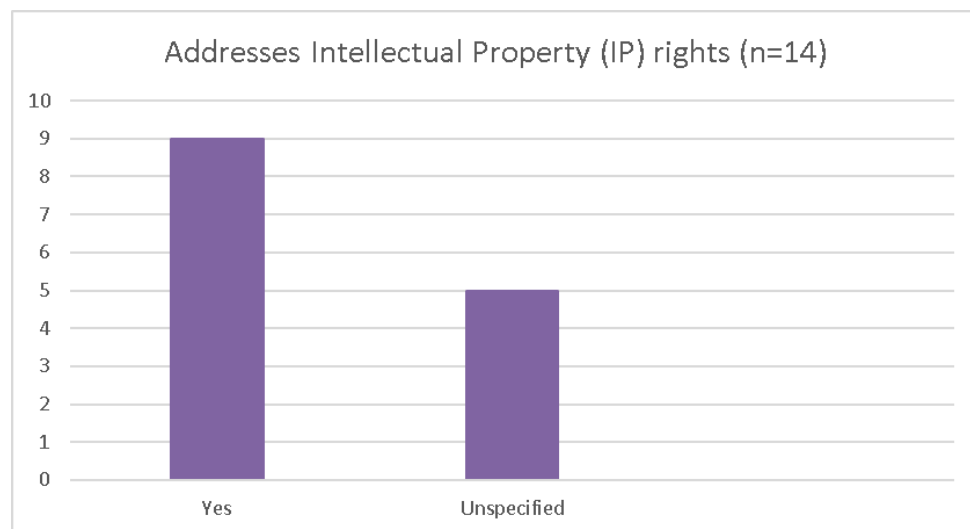
*“To set clear and agreed technical and policy-related preconditions to facilitate reuse of research data, including provision of the necessary expertise and support.”<sup>93</sup>*

The policy promotes re-use on several levels: calling on researchers to re-use the data and services of others where possible, to make their data accessible for re-use, and to allow for their research to be reproduced.<sup>94</sup> The Slovak Republic policy goes further to make a commitment to seek mechanisms to monitor the re-use of research data.<sup>95</sup> Norway’s policy succinctly refers to the importance of describing data effectively and sharing information on how it can be re-used.

*“Research data must be adapted for searchability and retrieval and, when relevant, structured for genuine reusability. This means, among other things, that the data must be equipped with reliable metadata and published under a license that clearly specifies how the data can be used.”<sup>96</sup>*

As at March 2021, just over half of the analysed national policies mention IP related to data in some form. These include Cyprus, France, the Czech Republic, the Slovak Republic, Slovenia, Switzerland, Serbia, the Netherlands and the UK.

Figure 9. Number of policies that address IP in some form.



Countries that address IP generally approach it when describing the conditions under which data should or should not be made available (i.e. when abiding by IPR, or in the case of copyright infringement). Slovenia goes one step further by pointing out the importance of respecting IP while at the same time using licensing to enable re-use with a section entitled *Licensing scientific information with open access licenses enables the widest reuse of research results*.

*“Public research organisations should, also with encouraging the use of open access licenses (e.g., Creative Commons), encourage licensing the scientific publications, and when necessary, the research data according to the*

<sup>93</sup> Netherlands: *National Plan Open Science*, 2017, p5 [https://www.openscience.nl/files/openscience/2019-02/nationalplanopenscience\\_en.pdf](https://www.openscience.nl/files/openscience/2019-02/nationalplanopenscience_en.pdf)

<sup>94</sup> Netherlands: *National Plan Open Science*, 2017, p. 23

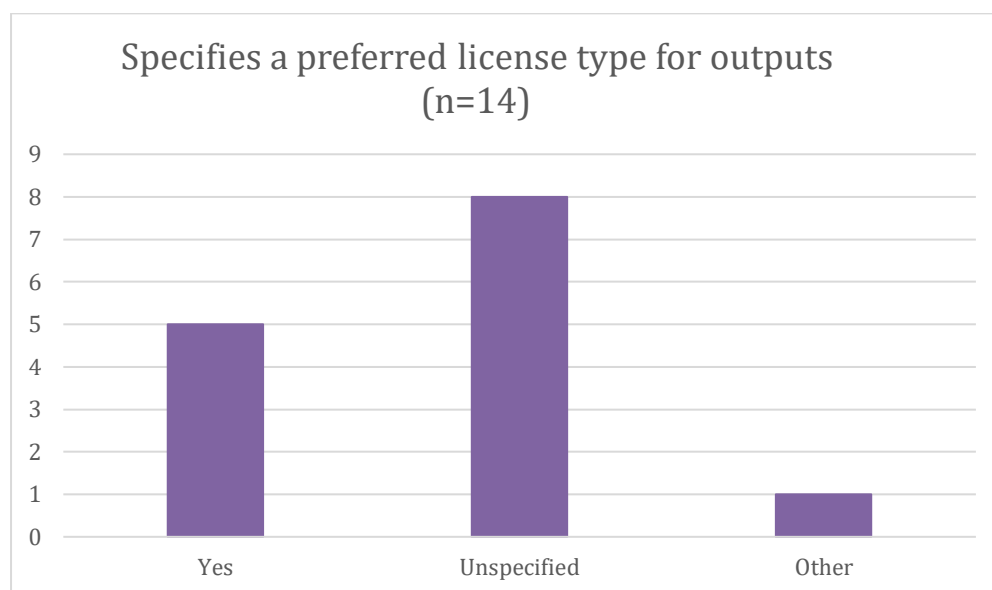
<sup>95</sup> Slovak Republic: *Open Government Partnership National Action Plan of the Slovak Republic 2017 – 2019*, p. 23

<sup>96</sup> Norway: *National Strategy on Access to and Sharing of Research Data*, p6

*open access principles so that copyright of authors and third parties will be respected and the widest possible open access and re-use of scientific publications and research data enabled.*<sup>97</sup>

Several policies address the legal challenges in making data available for re-use around the exploitation and ownership of data IP and the need for more action in this area. To help put effective reuse strategies in place, more research, reports or common guidelines are necessary as specified by the Swiss or the Dutch policies. The Dutch policy also points out the need for more research into research data ownership for public and private entities.<sup>98</sup> It also suggests the need for a code of conduct, principles or tighter opt-out criteria for both business and research communities. More research and work are clearly necessary on this topic to truly enable the more comprehensive reuse of research data.

Figure 10. Number of policies that specify a preferred license type.



Five national policies refer to a specific licence type for outputs, including the Creative Commons licence. One policymaker promotes the use of open licences without naming a specific type. As an example, Slovenia’s policy states

<sup>97</sup> Slovenia: *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020*, 2015, p.11

<sup>98</sup> Netherlands: *National Plan Open Science*, 2017, p. 23

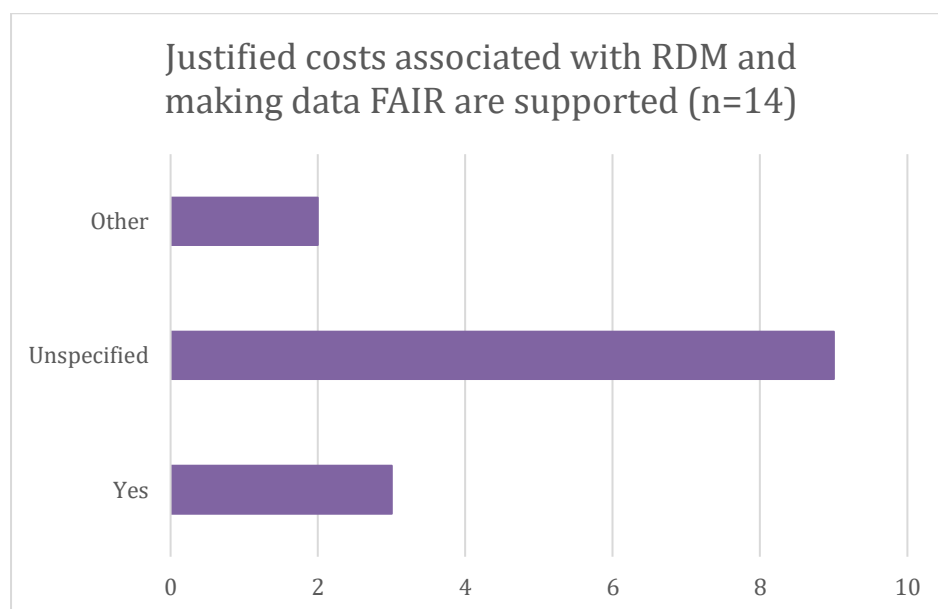
*“Programmes and projects in the pilot programme must take measures to enable for third parties to access, mine, exploit, reproduce and disseminate the research data, free of charge to all users. Licensing with open access licenses Creative Commons (CC BY or CC0) is a straightforward and effective way to attain this goal.”<sup>99</sup>*

While it is good practice to specify open licenses in policies, it is also crucial to provide adequate support to help researchers determine when a license is relevant for their outputs, how to choose the best license for their needs and how to associate licenses with their outputs.

### 5.10 Costs

It is essential that policies address the issue of eligible costs relating to RDM since policy implementation will depend on the resources available to make data FAIR or accessible to lesser or greater extents. However, this is often tasked to the national research funder rather than specified in a national policy, plan or strategy.

Figure 11. Number of policies that allow justified costs for RDM.



As at March 2021, three national policies explicitly mention justifying costs associated with RDM and making data FAIR (explicitly or implicitly). These include the French *National Plan for Open Science*, the Government of Slovenia’s *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020*, and the UK’s *Concordat on Open Research Data*. Slovenia states that costs incurred related to OA to research data are eligible for reimbursement for example.<sup>100</sup>

<sup>99</sup> Slovenia: *National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015 - 2020*, 2015, p. 20

<sup>100</sup> Ibid

## 6. Country Profiles

### 6.1 Overview

In this section, we present the policy landscape by providing short country profiles and list within each the policy in question and any other relevant documents and developments towards policy making on open science/open data. We present a short context for the work that is ongoing, and developments since the first version of this report back in 2016.

We have sought to identify where national open data policies are linked to other agendas, such as Open Access or Open Science more broadly. In addition to addressing the benefits of openness, it should be said that many of these policies are also explicit about situations where data should not be shared, for ethical, commercial or security-related reasons.

Below we present national policies (Table 1) and laws (Table 2), in two separate tables, with names of, and links to, each individual document. Table 3 presents links to National Funder Policies whereas Table 4 presents further analysis of each policy document.

**Table 1 - List of National Policies in Europe; status March 2021**

<b>National Policies of EU Member States</b>	
In alphabetical order by country code	
<b>Country</b>	<b>Name of policy</b>
CY	<a href="#">National Policy of the Republic of Cyprus for Open Access to Scientific Information</a>
CZ	<a href="#">Action Plan for Implementation of the National Strategy on Open Access to Scientific Information of the Czech Republic for 2017–2020</a>
CZ	<a href="#">National Strategy on Open Access to Scientific Information of the Czech Republic for 2017–2020</a>
ES	<a href="#">State Plan for Research, Development and Innovation 2017-2020</a>
FR	<a href="#">National Plan for Open Science</a>
FI	<a href="#">Open Science and data - Action Programme for the Finnish Scholarly Community</a>
IE	<a href="#">National Framework on the Transition to an Open Research Environment</a>
IT	<a href="#">National Programme for Research 2021-2027</a> that contains the extended abstract (section 6.2) of the <a href="#">National Plan Open Science</a> to be issued in 2021 as a stand-alone document
NL	<a href="#">National Plan Open Science</a>
SI	<a href="#">National Strategy of Open Access to Scientific Publications and Research Data in Slovenia 2015-2020</a>
SK	<a href="#">The Open Government Partnership National Action Plan of the Slovak Republic 2020-2021</a>
<b>Selected non-EU National Policies</b>	
CH	<a href="#">White Paper for a Swiss Information Provisioning and Processing Infrastructure 2020</a>
NO	<a href="#">National Strategy on Access to and Sharing of Research Data</a>
SRB	<a href="#">Open Science Platform</a>
UK	<a href="#">Concordat on Open Research Data (Policy of a UK multi-stakeholder group, including research funders and higher education associations)</a>

Table 2 - List of National Laws; status March 2021

National Laws referring to Open Science, i.e. research data, in European Member States	
FR	<a href="#">Law for a Digital Republic</a>
LT	<a href="#">Law on Higher Education and Research</a>

Table 3 List of selected National Funder Policies

National Funder Policies	
AT	<a href="#">FWF Open Access Policy: Open Access to Research Data</a>
BE	<a href="#">BELSPO Open Research Data mandate</a>
DE	<a href="#">DFG Guidelines on the Handling of Research Data</a>
LT	<a href="#">LMT Guidelines on Open Access to Scientific Publications and Data</a>
NO	<a href="#">The Research Council Policy for Open Science</a>
PT	<a href="#">FCT Policy on management and sharing of data and other results arising from FCT-funded research</a>
SE	<a href="#">FORMAS Guidelines for applicants</a>
UK	<a href="#">UKRI Common Principles on Data Policy (Policy of UK national funder organisation UK Research and Innovation)</a>



Table 4 - Countries with National Policies in Place<sup>101</sup>

MEMBER STATE / COUNTRY	TYPE OF POLICY (STATUTE, GOVERNMENT MINISTRY, FUNDER POLICY)	YEAR POLICY CAME INTO EFFECT	SPONSORING ORGANISATION (MINISTRY, FUNDER, ETC)	SCOPE / COVERAGE BEYOND DATA	LINKED TO OA / OPEN SCIENCE POLICY?	SOFT/HARD <sup>102</sup>	COVERAGE OF SKILLS OR TRAINING?	MONITORING AND/OR COMPLIANCE <sup>103</sup>
<b>EU</b>								
BE	Code of Ethics	2009	Learned Societies, supported by Federal Government	Protocols	No	Hard	No	No
CY	Joint policy of Government and Funder	2016	Working group involving government ministry, funder and universities	Publications	Yes	Soft	Yes	Yes
CZ	National Strategy	2017	Ministry of Science, Research and Innovation	Publications	Yes	Soft	Yes	No
ES	State Plan	2018	Ministry	Covers data alongside many other RDI related issues, including OA	Yes	Soft	Yes	No
FI	Action plan	2018	Finnish Universities' Council of Rectors	Data only	No	Soft	No	No
FR	Law/National Plan	2016/2018	Parliament/Ministry	Covers data alongside many other ICT related issues, including OA	Yes	Hard	No/Yes	No

<sup>101</sup> In this table we also include national funders that have had a significant national impact.

<sup>102</sup> Here we define a 'hard' policy as one that employs language such as "must" or "should", as opposed to soft policies which more gently advise or encourage.

<sup>103</sup> In this column, a "No" entry means either that compliance is not addressed explicitly or is devolved to a lower level.

IE	National Framework	2019	Ministry for Training, Skills, Innovation, Research and Development	Publications, Infrastructure	No	Hard	Yes	Yes
IT	National Plan	2021	Ministry of Research	N/A	N/A	N/A	N/A	N/A
LT	Law	2016	Parliament	Publications	Yes	Hard	No	Yes
NL	National Plan / Concordat	2017	Ministry	Publications	Yes	Soft	Yes	Yes
SK	National Action Plan	2017	Government	Publications	Yes	Soft	No	Yes
SI	National Policy	2015	Government	Publications	Yes	Hard	Yes	Yes
<i>NON-EU</i>								
NO	National Strategy	2017	Government	Only data	No	Hard	No	No
CH	White Paper	2014	Universities	Covers data alongside many other ICT related issues, including OA	Yes	Hard	Yes	Yes
RS	National policy	2018	Ministry	Open Science	Yes	Soft	Yes	Yes
UK	National Policy / Concordat	2015/2016	Funding Council, Research Councils, Universities, Private Funder	Software (in the FAQs and Concordat)	No	Hard	Yes	No

## 6.2 Member states with existing national policies (12/27)

### BELGIUM (BE)

An Open Access clause was adopted in the Belgian Copyright law<sup>104</sup> in Sep. 2018. This law gives authors the right to make research publications available in open access if the publication is a result of research funded by public funds for at least 50%, with a maximum embargo period of 6 months for STM and 12 months for SSH. The law doesn't mention data specifically. This law completes and reinforces the recent decree<sup>105</sup> of the fédération Wallonie-Bruxelles (FWB) which requires the deposit in open access of scientific articles in institutional repositories. We have included this law here, as it demonstrates Belgium's commitment to OA, which could see a stronger focus on research data in the future. In 2020, the Flemish Open Science Board (FOSB) has been formally established. This board has set up an Open Science Roadmap for Flanders<sup>106</sup>, including KPIs for Open Science in Flanders.

The Belgian research funder, BELSPO, published an Open Research Data Mandate<sup>107</sup> on 3<sup>rd</sup> December 2019. The mandate applies to digital data and associated metadata, collected by research projects partially or fully funded by BELSPO. The policy covers issues such as selection of repositories, the FAIR principles, data formats and licensing (recommending CCO and CC BY licenses). The policy also recognises that some data will need protecting and refers to "as open as possible, as closed as necessary" principle in that respect. DMPs are a requirement for all grantees who use, re-use or generate data and refers users to a BELSPO DMP template.

Preserving and providing access to data to allow verification of published research is addressed within the "Code of Ethics for Scientific Research in Belgium"<sup>108</sup>, which states that "the primary data of a research project and the protocols must be kept and made accessible during a determined and sufficient period of time. When publications, especially review and summary articles, do not contain all the necessary data for verification, the data should nevertheless be available." (p8.) The rationale for RDM stems from the need for verifiability of research results.

The Belgian approach, which is similar in some ways to Estonia's Statement of Principles, was led by the Learned Societies of Belgium, with the support of the Federal Government, and covers both primary data and the protocols and methods required to replicate scholarly findings. The document draws legitimacy from its origins within the Belgian learned societies, claiming that: "A code of ethics offers advantages in relation to legal or statutory standards. Indeed, it is impossible to elaborate precise rules covering all cases and circumstances. Furthermore, a code, which is based on the values shared by researchers, has a greater moral legitimacy than the rules imposed top down."

It is noteworthy for being the longest-lived of the policies considered in this report. While this is a 'hard' policy in terms of its language, the policy appeals more to the scholar's sense of being part of a community sharing high standards than some other 'carrot-and-stick' types approaches. This is demonstrated by the process of its creation, via the Learned Societies. Skills and training are addressed only in very general terms, in that researchers must become skilled in all techniques necessary to conduct their research, data management being but one of these.

#### *Additional information*

In addition to the Code of Ethics, "The Brussels Declaration on Open Access"<sup>109</sup> of 2012 (signed by the federal, Flemish and Brussels-Wallonia Science Ministers), commits the signatories to "investigating possibilities and new

---

<sup>104</sup> Belgian Copyright Law.

[http://www.ejustice.just.fgov.be/cgi/article.pl?urlimage=%2Fmopdf%2F2018%2F09%2F05\\_1.pdf%23Page81&caller=summary&language=fr&pub\\_date=2018-09-05&numac=2018031589](http://www.ejustice.just.fgov.be/cgi/article.pl?urlimage=%2Fmopdf%2F2018%2F09%2F05_1.pdf%23Page81&caller=summary&language=fr&pub_date=2018-09-05&numac=2018031589)

<sup>105</sup> Open Access Decree. <https://openaccess.be/2018/05/08/an-open-access-mandate-adopted-by-the-wallonia-brussels-federation-government/>

<sup>106</sup> Open Science in Vlaanderen. <https://www.ewi-vlaanderen.be/nieuws/open-science-vlaanderen-uitgewerkte-roadmap>

<sup>107</sup> BELSPO Open Research Data Mandate.

[http://www.belspo.be/belspo/openscience/doc/ORD\\_Policy\\_Dec2019.pdf](http://www.belspo.be/belspo/openscience/doc/ORD_Policy_Dec2019.pdf)

<sup>108</sup> Code of Ethics for Scientific Research in Belgium.

<https://www.kuleuven.be/english/research/integrity/practices/belspo-code>

<sup>109</sup> The Brussels Declaration on Open Access. <https://openaccess.be/2012/11/29/brussels-declaration-on-open-access-signed-by-ministers-nollet-magnette-and-lieten/signedbrussels-declaration-on-open-access/>

opportunities in the broad Open Access field, all in frequent collaboration with relevant stakeholders, considering Open Access to scientific publications a forerunner of new initiatives in the ‘Open Data’ and ‘Open Science’ areas”.

Research Foundation Flanders (FWO), a national funding agency now mandates the use of DMPs for all projects funded by the agency.<sup>110</sup> For the FWO, the emphasis of their RDM policy is currently focused on long-term data preservation and management. Research data should be preserved for a period of at least five years from the end of each funded research project.

#### CYPRUS (CY)

The National Policy of the Republic of Cyprus for Open Access to Scientific Information<sup>111</sup> was developed via a working group including government, national funder and universities, and approved at Government level in 2016, although – as with the Portuguese and Norwegian policies – it is important to note that the Cypriot policy encourages without mandating. The Horizon 2020 Open Data Pilot is currently the only ‘hard’ mandate governing HE research in Cyprus. The national policy has also been adopted by the national funder, the Research Promotion Foundation (RPF), and universities are expected to follow the national policy, but are also free to create their own institutional policies which align with it. The policy covers both data and Open Access publications and encourages Data Management Plans for funded projects and requests that all researchers submit data and metadata to a suitable repository. Monitoring of compliance is described, through a special Monitoring Mechanism. Revision of the policy is under discussion in 2020.

#### CZECH REPUBLIC (CZ)

A National Strategy on Open Access To Scientific Information (2017–2020) was approved by the Government in 2017, which covers both research publications and research data. This document originates from the office of the Deputy Prime Minister and is pitched at quite a high level. In the first half of 2019, a long foreseen Action Plan for Implementation of the National Strategy on Open Access to Scientific Information of the Czech Republic for 2017–2020 was approved by the Czech Government. The Action Plan defines concrete goals and methods in the aim of fulfilling general ideas of the National Strategy.

Besides the National Strategy, several research institutions in the Czech Republic have their own Open Access policies, for example, AV ČR, MUNI, VŠB-TUO, and VUT, to name some of them. A brief overview of the current situation of Open Access in the Czech Republic can be found on the Open Access in the Czech Republic website<sup>112</sup>.

#### FINLAND (FI)

On 10<sup>th</sup> December 2019 a Declaration for Open Science and Research (Finland) 2020-2025<sup>113</sup> was approved by the National Open Science and Research Steering Group. The Declaration was jointly created by the Finnish Research Community and provides a common direction for the development of Open Science within the community. With regard to Open Research Data, the declaration refers to the principles of “as open as possible, as closed as necessary” and the FAIR principles. The next step will be for the research community to express its commitment to the declaration. Open Science Coordination will invite all the organisations of the research community in Finland to sign the joint Declaration for Open Science and Research in February 2020.

The Finnish universities’ council of rectors (UNIFI) established the 2018 Open Science and data - Action Programme for the Finnish Scholarly Community<sup>114</sup>, which is being co<sup>115</sup>ordinated by The Federation of Finnish Learned Societies. The Action programme refers to FAIR data as one of the key three themes of the programme, the other two being

---

<sup>110</sup> <https://www.fwo.be/en/the-fwo/organisation/data-management-plan/>

<sup>111</sup> Cyprus National Policy of the Republic of Cyprus for Open Access to Scientific Information. <http://opensciencency.ucy.ac.cy/wp-content/uploads/2019/09/FINAL-EN-National-Policy-for-Open-Access-to-Scientific-Information.pdf>

<sup>112</sup> Open Access in the Czech Republic website. <http://openaccess.cz/en/open-access-in-the-czech-republic/>

<sup>113</sup> Declaration for Open Science and Research (Finland) 2020-2025. [https://avointiede.fi/sites/default/files/2020-02/declaration2020\\_0.pdf](https://avointiede.fi/sites/default/files/2020-02/declaration2020_0.pdf)

<sup>114</sup> Open Science and data - Action Programme for the Finnish Scholarly Community.

[http://www.doria.fi/bitstream/handle/10024/164174/UNIFI\\_Open\\_Science\\_and\\_Data\\_Action\\_Programme.pdf?sequence=1&isAllowed=y](http://www.doria.fi/bitstream/handle/10024/164174/UNIFI_Open_Science_and_Data_Action_Programme.pdf?sequence=1&isAllowed=y)

<sup>115</sup> The Federation of Finnish Learned Societies. <https://www.tsv.fi/en>

'open publications' and 'culture of openness'. The action programme follows on from the development of Finland's "Open Science and Research Roadmap 2014–2017"<sup>116</sup>, which was led by the government's Ministry of Education and Culture, and sets out the policy framework for a national approach. The document is both ambitious – its aim is "to make Finland the leading country for openness in science and research by 2017, and for the opportunities afforded by open science to be extensively harnessed in Finnish society" – and it is consequently broad in scope, covering publications, data, methods and tools. It is linked to the national Open Access strategy and is complemented by an Open Science Handbook and a Data Management Guide for Finnish researchers.

The language used is relatively hard, using terms such as "will" rather than "should". Monitoring and compliance responsibilities are divided amongst stakeholder groups, and responsibility for skills and training is delegated to the Doctoral Training Centres, placing it firmly within the academic domain, and putting the emphasis on shared best practice as opposed to a top-down mandate. The Roadmap refers to a forthcoming Certificate of Open Research, due in 2017.

## FRANCE (FR)

The French approach is, together with Lithuania, the most high level of all: the "Law for a Digital Republic"<sup>117</sup> (Loi n°2016-1321 pour une République numérique) passed by the French Parliament in 2016. Designed by the French government as a framework for the development of the entire national digital economy, this is also the most wide-ranging of all the policies examined in this study, covering a multitude of digital issues, including both Open Access publications and research data. Article 30 ensures the re-usability of open data deriving from public funding:

When data result from a research activity funded for at least half by the State, local authorities or public institutions, by national agencies or by European Union grant are not protected by a specific right or a particular regulation and have been made public by the researcher, the institution or the research agency, their reuse is free. The publisher of a scientific publication [...] cannot limit the reuse of the research data made public in the publication.<sup>118</sup>

The French law is unlike most of the other policies in that it focuses on rights, rather than obligations, such as the right to access research data and the right to deposit publications in an Open Access repository. In practical terms, it seems somewhat obvious to say that implementation and monitoring will not be the duty of the French parliament but rather devolved to individual research organisations and publishers, although the ultimate arbiter of any disputes will be the French legal system. Being a law, it is very much a hard policy.

In July 2018, the Ministry of Higher Education, Research and Innovation adopted the ambitious National Plan for Open Science<sup>119</sup>. The plan presents three broad commitments under the headings:

- 'Generalising Open Access to Publications'
- 'Structuring Research Data and Making it Available through Open Access'
- 'Be part of a sustainable European and international open science dynamic'

Each commitment is accompanied by a short Roadmap section, which outlines the stepping stones to meeting each commitment. The section on open data can be summarised in the following quote:

*"Our ambition is to make sure that the data produced by French public research are gradually structured in accordance with FAIR principles (Easy to find, Accessible, Interoperable, Reusable), preserved and, when this is possible, open."<sup>120</sup>*

---

<sup>116</sup> Finland's Open Science and Research Roadmap 2014–2017.

<http://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/75210/okm21.pdf?sequence=1&isAllowed=y>

<sup>117</sup> French Law for a Digital Republic. <https://www.legifrance.gouv.fr/eli/loi/2016/10/7/ECFI1524250L/jo/texte>

<sup>118</sup> OpenAIRE blog, *New French Digital Republic Law boosts support for OA and TDM*, 29.11.2016.

<https://www.openaire.eu/blogs/new-french-digital-republic-law-boosts-support-for-oa-and-tdm-1>

<sup>119</sup> France's National Plan for Open Science. [https://cache.media.enseignementsup-recherche.gouv.fr/file/Recherche/50/1/SO\\_A4\\_2018\\_EN\\_01\\_leger\\_982501.pdf](https://cache.media.enseignementsup-recherche.gouv.fr/file/Recherche/50/1/SO_A4_2018_EN_01_leger_982501.pdf)

<sup>120</sup> National Plan for Open Science (2018) p.6. [http://cache.media.enseignementsup-recherche.gouv.fr/file/Recherche/50/1/SO\\_A4\\_2018\\_EN\\_01\\_leger\\_982501.pdf](http://cache.media.enseignementsup-recherche.gouv.fr/file/Recherche/50/1/SO_A4_2018_EN_01_leger_982501.pdf)

The Plan references the "Artificial Intelligence Strategy"<sup>121</sup> which was launched in March 29, 2018, where the President announced the establishment of openness principles by default for all data published by projects funded by public funds. The plan furthermore recognizes the limitations placed on some data by law, professional secrecy, commercial limitations and IPR issues etc. Data processing will now be an eligible research expense in funded projects and researchers will be invited to submit their data to in certified data repositories. The plan also states that Data Management Plans will be generalized; a prize for research data will be set up to reward and highlight research teams who are excelling in this area and pledges the support of France to the RDA and software and technical solution development in this field.

The main national research funder (ANR) has also an Open Science policy<sup>122</sup>, which specifically addresses open research data and is guided by the principle of "as open as possible, as closed as necessary". The agency draws their grantees attention to data management and all projects funded from 2019 requires data management plans.

#### *Additional information*

As a member of the G8, together with Germany, Italy and the UK, France is party to the G8 science ministers statement, made in London on 12 June 2013.<sup>123</sup> This statement "proposes to the G8 for consideration new areas for collaboration and agreement on global challenges, global research infrastructure, open scientific research data, and increasing access to the peer-reviewed, published results of scientific research."

France is a member of The Open Government Partnership, and the OGP National Action Plan<sup>124</sup> presents commitments to open science.

#### **IRELAND (IE)**

In July 2019 the Minister of State for Training, Skills, Innovation, Research and Development launched a new National Framework on the Transition to an Open Research Environment<sup>125</sup>. The framework is a first step in a process to create a National Action Plan for the transition to an open research environment in Ireland. The framework is aligned with European Commission policy and developed in response to EU Recommendation 2018/790 25 April 2018, which asks Member States to set and implement clear policies which cover open access to publications, management of research data etc., preservation and reuse of scientific information, infrastructures for open research, skills and competencies and incentives and rewards.<sup>126</sup>

With regard to open access publications, the frameworks states that "all Irish scholarly publications resulting from publicly funded research will be openly available by default from 2020 onwards."<sup>127</sup>

The framework specifically aims to enable FAIR data by supporting the foundational principles of Findable, Accessible, Interoperable and Reusable research data. To support FAIR data, the framework specifically highlights skills and competencies; research management planning and DMPs; interoperability across disciplines, systems and domains; the use of citations and persistent identifiers. Regarding data openness, the framework refers to the EC guidance that data should be "as open as possible, as closed as necessary"<sup>128</sup> and that funders and institutions should support requirements for data management and sharing through grant conditions, and monitor compliance.

---

<sup>121</sup> Artificial Intelligence Strategy. <https://www.aiforhumanity.fr/en/>

<sup>122</sup> ANR Open Science policy. <https://anr.fr/en/anrs-role-in-research/values-and-commitments/open-science/>

<sup>123</sup> G8 Science Ministers Statement (2013), URL:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/206801/G8\\_Science\\_Meeting\\_Statement\\_12\\_June\\_2013.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/206801/G8_Science_Meeting_Statement_12_June_2013.pdf)

<sup>124</sup> Open Government Partnership (OGP) National Action Plan. <https://www.opengovpartnership.org/wp-content/uploads/2018/08/France-Action-Plan-2018-2020-English.pdf>

<sup>125</sup> National Framework on the Transition to an Open Research Environment. [http://norf-ireland.net/wp-content/uploads/2019/07/NORF\\_Framework\\_10\\_July\\_2019-2.pdf](http://norf-ireland.net/wp-content/uploads/2019/07/NORF_Framework_10_July_2019-2.pdf)

<sup>126</sup> Commission Recommendation (EU) 2018/790 of 25 April 2018 on access to and preservation of scientific information C/2018/2375. (OJ L 134, 31.5.2018, p. 12–18). Available online: <http://data.europa.eu/eli/reco/2018/790/oj>

<sup>127</sup> Government of Ireland, (2019) National Framework on the Transition to an Open Research Environment.

Prepared by the National Open Research Forum, p. 6. Available online: [http://norf-ireland.net/wp-content/uploads/2019/07/NORF\\_Framework\\_10\\_July\\_2019-2.pdf](http://norf-ireland.net/wp-content/uploads/2019/07/NORF_Framework_10_July_2019-2.pdf)

<sup>128</sup> Ibid. p 8.

Until now, the EPA (Environmental Protection Agency) was the sole Irish funder requiring data deposit from projects which they fund. “All significant datasets produced during the research project must be submitted to the EPA at the end of the project for archiving in the EPA Research Data Archive. Some other funders’ OA publications policies also mention archiving data where possible, and a few HEIs, including Trinity College Dublin and University College Cork, have introduced RDM policies.<sup>129</sup>

#### ITALY (IT)

On February 1, 2021 the Ministry of Research issued the National Programme for Research 2021-2027<sup>130</sup> that contains the extended abstract (section 6.2<sup>131</sup>) of the National Plan Open Science, to be issued in 2021 as a stand alone document. Several individual universities and research centres are creating their own policies to manage research data and provide support to researchers; some research centres have consolidated experience in research data management in their own specific domains.

In recent years several OS and RDM events and training activities have been organised under the auspices of OpenAIRE<sup>132</sup>, RDA<sup>133</sup>, EOSC-Pillar<sup>134</sup> and the Italian Association for the Promotion of Open Science<sup>135</sup>, but the lack of a single, central body to coordinate these efforts has been noted. OpenAIRE NOAD<sup>136</sup> provides support to all Open Science stakeholders. A small working group, the Italian Open Science Support Group (IOSSG)<sup>137</sup> has a number of supporting documents. ICDI (Italian Computing and Data Infrastructure)<sup>138</sup> gathers representatives of some of the main Italian Research Infrastructures and national nodes of European Infrastructures with the aim of promoting synergies at national level in order to optimize Italian participation in current European challenges in this sector, including the European Open Science Cloud (EOSC), the European Data Infrastructure (EDI) and HPC. ICDI is one of four founding members of the EOSC Association. In 2021 ICDI is developing a national Competence Centre (CC)<sup>139</sup> aimed at providing training and support on FAIR data management and Open Science. The CC aims at building a network of experts in Open Science and FAIR data management to support the national community and the enhancement and development of related skills. One of the activities of the Competence Centre, driven by CNR, is the new open-science.it portal which will be a one stop shop for news and information about Open Science in the Country. The portal is to be launched in 2021.

#### LITHUANIA (LT)

Although Lithuania has a Law on Higher Education and Research<sup>140</sup> (2009, revised 2015 and 2016) which covers Open Access and research data, stipulating that “the results of all research works carried out in state higher education and research institutions must be communicated to the public,” in practice the more relevant policy document is the Research Council of Lithuania’s “Guidelines on Open Access to Scientific Publications and Data” (2016)<sup>141</sup>. These guidelines likewise cover both publications and data. Skills are not addressed, but responsibilities for various aspects of Open Access and Open Data are covered in detail, indeed in more explicit detail than most of the other national policies. As with France, the only other EU country known to have enshrined OA and research data in law, the focus

---

<sup>129</sup> In a distant but still noteworthy initiative, the Irish government’s Government Reform Unit has recently published its “Open Data Strategy 2017 – 2022” which notes an intention to “Explore the possibility to broaden the initiative to include Open Research Data, in line with the requirements of the Horizon 2020 research programmes, and with emerging policy in Irish research funding bodies. Where research is publicly-funded, make the research findings available in Open Data formats.” This exploratory work is anticipated to begin in 2021.

<sup>130</sup> <https://www.mur.gov.it/it/aree-tematiche/ricerca/programmazione/programma-nazionale-la-ricerca>

<sup>131</sup> <https://www.mur.gov.it/sites/default/files/2021-01/Pnr2021-27.pdf>

<sup>132</sup> <https://www.openaire.eu/>

<sup>133</sup> <https://rd-alliance.org/>

<sup>134</sup> <https://www.eosc-pillar.eu/>

<sup>135</sup> <https://aisa.sp.unipi.it/chi-siamo/>

<sup>136</sup> <https://www.openaire.eu/noad-activities>

<sup>137</sup> <https://sites.google.com/view/iossg/home>

<sup>138</sup> <https://www.icdi.it/en/>

<sup>139</sup> <https://www.icdi.it/en/activities/tf-cc>

<sup>140</sup> Lithuanian Law on Higher Education and Research. <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/548a2a30ead611e59b76f36d7fa634f8?jfwid=rp9xf47k7>

<sup>141</sup> Lithuania’s Guidelines on Open Access to Scientific Publications and Data. [https://www.lmt.lt/data/public/uploads/2016/09/eng\\_-atvira-prieiga-\\_galutinis.pdf](https://www.lmt.lt/data/public/uploads/2016/09/eng_-atvira-prieiga-_galutinis.pdf)



is more on rights than on obligations, and the inference is that universities will be responsible for developing their own policies, procedures, guidance and monitoring systems.

#### *Additional information*

Some research institutions in Lithuania, including Kaunas University of Technology, Lithuanian University of Health Sciences, Mykolas Romeris University, Vytautas Magnus University, Lithuanian University of Educational Sciences and Vilnius Gediminas Technical University are understood to have adopted institutional policies aligned with the Research Council guidelines, the Horizon 2020 Open Access Mandate and Open Research Data Pilot, and the Guidelines on Data Management in Horizon 2020.<sup>142</sup>

#### **NETHERLANDS (NL)**

In February 2017 the National Plan Open Science<sup>143</sup> in the Netherlands was published. This Plan shows the ambition of the involved institutes towards Open Science. The implementation of this plan has been followed up by the National Platform Open Science. Together with the publishing of the plan a new website was launched: National Platform Open Science.

There are 17 parties involved like the Ministry of Education, Culture and Science, national funders NWO and ZonMw, the Academy KNAW, DANS, Association of Universities VSNU, the National Library KB etc.

The focus of the Platform was to accelerate the key areas: full open access publishing; optimal reuse of research data; corresponding evaluation systems for recognition and rewards; and encouraging and supporting open science.

In May 2019 NPOS changed to a programme, with a number of projects in the field of the above-mentioned topics. The projects below are outlined in a report (in Dutch) available from the NPOS website:

- Transition costs Open Science
- Exploration of broadening Open Access to books
- Exploration and optimization of the national data landscape
- Professionalising data stewardship: competences, training and education
- Indicators Open Science
- Accelerate Open Science: organising a yearly National Open Science Festival
- Citizen Science

Starting from 1st January 2020, the national funding agency Netherlands Organisation for Scientific Research (NWO) updated its data management protocol. The basic principles will remain. Researchers need to carefully manage data resulting from NWO-funded research and prospectively plan for data sharing and preservation. The guiding principle is that research data should be as open as possible, as closed as necessary. To ensure that data optimally benefits the wider research community and society, data should be made findable, accessible, interoperable and reusable (FAIR).

In 2019, NWO launched an initiative for the voluntary international alignment of research data management policies together with Science Europe. This initiative resulted in the Science Europe Data Management Plan Core Requirements and criteria for the selection of trustworthy repositories.

For all grants awarded from the 1st of January 2020, a new data management plan (DMP) template will apply. This template is in line with Science Europe's Core Requirements for Data Management Plans and it will better support researchers in ensuring that their data are FAIR.

---

<sup>142</sup> Further information is available in the blog post at <http://eifl.net/eifl-in-action/open-access-lithuania>

<sup>143</sup> National Plan Open Science. <https://www.openscience.nl/en/national-platform-open-science/national-plan-open-science>



#### SLOVAKIA (SK)

In Slovakia there are no OS policies on institutional/national level adopted yet and there are also no specific policies for open data. However, towards the end of 2019, a new "Action Plan for Open Government in Slovak Republic for years 2020-2021"<sup>144</sup> was approved by the Government. A key goal, as outlined in the section dedicated to Open Science, is to adopt a National Open Science strategy. The deadline for adoption is the end of 2021. Main points of the strategy are: Academic publications, thesis etc. published OA and under CC license; Obligations to create institutional policies for OS at every university; Developing guidelines for implementation of repositories at universities/institutions; FAIR data and DMP as compulsory for every scientific project funded from public sources; Contract „publish and read“; OS as part of educational process - at second and third level of education; special education for further librarians/information specialists, Online platform with OS courses; Change in evaluation of scientific staff – take into account OS also; Citizen science.

In 2017, Open Government Partnership National Action Plan of the Slovak Republic 2017 – 2019<sup>145</sup> was approved and includes Open Science policy commitments. There are no special policies for Open Research Data. Open Data is mentioned in above for example, to introduce the basic principles of Open Access to scientific publications under a public license under the Operational Program Research and Innovation; establish conditions for passportization of open research data under a public license and monitor its implementation in practice. Implementation work is ongoing.

#### SLOVENIA (SI)

National open access strategy<sup>146</sup> was adopted by the Government of the Republic of Slovenia in September 2015 and is fully aligned with the H2020 open access policy. The Strategy contains a chapter on an open data pilot, more or less in line with the EU H2020 pilot. It contains a requirement for Open Access by default, the production of a data management plan, and recommendations about where to store data for the long term. The government strategy was followed by an action plan<sup>147</sup> which covers 2015-2020 wherein the national research agency will adapt the regulation and specify the scope and details of an open data pilot. It is expected that the coverage of the infrastructure will be broadened to include preservation and access as well as data storage and archiving. The Slovenian Research Agency is member of cOAlition S and will include Plan S provisions in all new funding calls opened after 1 January 2021 (see Implementation Roadmap of cOAlition S Organisations<sup>148</sup>).

#### SPAIN (ES)

The Spanish Government published the State Plan for Research, Development and Innovation 2017-2020 in January 2018<sup>149</sup>. The plan includes a new focus on open access to scientific publications and research data.<sup>150</sup> The State Plan is the main instrument of the State Government for developing and achieving those objectives set at the Spanish Strategy for Science and Technology and Innovation 2013-2020, and at the Europe 2020 Strategy. The state plan presents a new focus on research data with a voluntary mandate that data from research funded by public funds should be stored and made available through Open Access for purposes of replication and reproduction of research and analysis.

---

<sup>144</sup> Action Plan for Open Government in Slovak Republic for years 2020-2021.

[http://www.minv.sk/swift\\_data/source/rozvoj\\_obcianskej\\_spolocnosti/otvorene\\_vladnutie/akcne\\_plany/akcny\\_plan\\_ogp\\_2020\\_2021/AP%20OGP%202020%20-%202021\\_material.pdf](http://www.minv.sk/swift_data/source/rozvoj_obcianskej_spolocnosti/otvorene_vladnutie/akcne_plany/akcny_plan_ogp_2020_2021/AP%20OGP%202020%20-%202021_material.pdf)

<sup>145</sup> Open Government Partnership National Action Plan of the Slovak Republic 2017 – 2019.

[https://www.minv.sk/swift\\_data/source/rozvoj\\_obcianskej\\_spolocnosti/otvorene\\_vladnutie/akcne\\_plany/2017\\_2019/Slovakia-OGP-nap-2017-english.pdf](https://www.minv.sk/swift_data/source/rozvoj_obcianskej_spolocnosti/otvorene_vladnutie/akcne_plany/2017_2019/Slovakia-OGP-nap-2017-english.pdf)

<sup>146</sup> Slovenian National open access strategy.

<https://www.gov.si/assets/ministrstva/MIZS/Dokumenti/ZNANOST/Strategije/National-strategy-of-open-access-to-scientific-publications-and-research-data-in-Slovenia-2015-2020.pdf>

<sup>147</sup> Slovenian open access action plan.

<https://www.gov.si/assets/ministrstva/MIZS/Dokumenti/ZNANOST/Strategije/Akciski-nacrt-izvedbe-nacionalne-strategije-odprtega-dostopa-do-znanstvenih-objav-in-raziskovalnih-podatkov-v-Sloveniji-2015-2020.pdf>

<sup>148</sup> Implementation Roadmap of cOAlition S Organisations. <https://www.coalition-s.org/plan-s-funders-implementation/>

<sup>149</sup> Spanish State Plan for Research, Development and Innovation 2017-2020.

<http://www.ciencia.gob.es/stfls/MICINN/Prensa/FICHEROS/2018/PlanEstatalIDI.pdf>

<sup>150</sup> 2017-2020 Plan Estatal de Investigación Científica y Técnica y de Innovación (pages 30-31)

The plan outlines how funded research projects may include, as an option, a plan for the management of research data that will be deposited in national/institutional/international repositories after the end of the project. The plan also recognises that data must be protected and some may not be amenable to openness for reasons of security, confidentiality or commercial reasons. The plan recommends that evaluation of researchers should take into account work published in open repositories and this regards both publications as well as research data.

Furthermore, two HE consortia (“Consortio Madroño” in Madrid and CSUC in Catalonia) have developed RDM services to support their researchers. Work is currently underway to create guidance and policies for member institutions based on the LEARN model policy.<sup>151</sup>

---

<sup>151</sup> LEARN, Highlights of the Fifth LEARN Workshop in Barcelona, 09.02.2017. <http://learn-rdm.eu/en/highlights-of-the-fifth-learn-workshop-in-barcelona/>

### 6.3 Member states with no national policy but which are active in this space (15/27)

Fifteen further EU states do not yet have active policies in place but are known to be developing national approaches.

#### AUSTRIA (AT)

Austria has no national policies at present. However, in 2020 the Open Science Network Austria (OANA) Working Group delivered Recommendations for a National Open Science Strategy in Austria<sup>152</sup>. In 2021, the Austrian Ministry of Education, Science and Research (BMBWF) will, on the basis of these recommendations, develop a national open science strategy for Austria. A number of national open science initiatives have been active in Austria for a number of years, such as:

- The Austrian Science Fund (FWF) has an open science policy, which mandates open access to research data, collected and/or analysed using FWF funds for projects approved from 1 January 2019, under new guidelines<sup>153</sup>. The guidelines were developed following a pilot project of 12 research projects. The guidelines mandate open access to research data on which the research publications of the project are based. Research data are all data necessary to reproduce and to verify the results of the publications, including the associated metadata. All research data and their metadata should be FAIR (findable, accessible, interoperable and reusable) the guidelines provide criteria for choosing repositories, licencing models and persistent identifiers.
- The project FAIR Data Austria aims to implement the FAIR principles at an institutional level in Austria. The National Node RDA Austria is actively supporting this initiative and dedicated to representing emerging research and data management communities throughout Austria. A FAIR Office Austria will be established and will support the alignment of tools and services for research data management with the FAIR principles and will provide services to all stakeholders.

#### BULGARIA (BG)

The Bulgarian Government published a National Strategy for Development of Scientific Research in the Republic of Bulgaria 2017 – 2030. Better Science for Better Bulgaria<sup>154</sup>. The strategy contains recommendations regarding the development of a national policy on open access to scientific results. Recommendation 13 states that “Planning open access and long-term conservation of the original data. The archiving of data should be planned, so as to ensure present and future access to them.”<sup>155</sup>

#### CROATIA (HR)

No national policy is yet in place, but there is much on-going work in this area. National policies on access and preservation of scientific information (both publications and data) are under the responsibility of the Ministry of Science, Education and Sports. The Ministry strongly supports open access to scientific information to provide maximum impact from the research they support. The Croatian Research and Innovation Infrastructures Roadmap 2014-2020<sup>156</sup> addresses the promotion of open access to research data, “especially data funded from public sources.” (See p.8, paragraphs g to j.)

---

<sup>152</sup> Recommendations for a National Open Science Strategy in Austria

<https://zenodo.org/record/4109242#.YFSZl6-mO6Y>

<sup>153</sup> Austrian Science Fund Open Access to Research Data guidelines <https://www.fwf.ac.at/en/research-funding/open-access-policy/open-access-to-research-data/>

<sup>154</sup> National Strategy for Development of Scientific Research in the Republic of Bulgaria 2017 – 2030. Better Science for Better Bulgaria. <http://horizon2020.mon.bg/?h=downloadFile&fileId=436>

<sup>155</sup> See OpenAIRE entry on Bulgaria for information on the recommendations. Available online:

<https://www.openaire.eu/os-bulgaria>

<sup>156</sup> Croatian Research and Innovation Infrastructures Roadmap 2014-2020. <http://knowledgebase.e-irg.eu/documents/243153/304945/Croatian+research+and+innovation+infrastructures+roadmap.pdf/56971624-8d9e-4280-a9c8-96798660e605?version=1.0>

## DENMARK (DK)

A Danish National Strategy for Open Access was revised in June 2018. The strategy states that the implementation of Open Access is to take place through the green model and to monitor this transition to OA publications, an OA indicator service has been set up. With regard to open access to research data The Ministry of Higher Education commissioned experts in 2017 to carry out a preliminary analysis of the potential for implementing FAIR data in Denmark, which may be a precede policy or strategy formation in this area. The report was published in March 2018 and highlights, for example, the need for national coordination and cooperation across research actors, libraries and research funding actors. The ministry webpage refers to a longstanding tradition of data management and refers back to work carried out in 2014 carried out by the Steering Group for National Data Management, which presented a strategy on data management in 2015 (in Danish.) This advocates a structured, holistic approach to data management, data preservation and data infrastructures, with a bottom-up process based on stakeholder collaboration. (Source: NordForsk (2016), "Open Access to Research Data – Status, Issues and Outlook"<sup>157</sup>). A National Forum for Data Management (Danish language) was formed in 2015, with representatives from the Danish universities and national libraries and a secretariat from DeIC. Its vision is "to promote academic and research initiatives in research data management within universities and link them in a national and international cooperation."

The Danish policy employs terms such as "should" and "shall", although practical implementation and monitoring are devolved to individual research organisations via their own policies and procedures. The strategy, being a national one, is quite wide-ranging, covering both data and the software/protocols necessary to re-run experiments (although not publications, which are mentioned only in passing), noting also the need to foster research data management skills. The strategy is clearly the product of considerable liaison across and between stakeholder groups and is sensitive to the differences between academic disciplines in terms of how research data management should be organised in practice.

Another document worthy of note is the Danish Code of Conduct for Research Integrity<sup>158</sup>, which was published in 2014 and is widely referred to by Danish Research Institutions. This code has a specific section on Data Management, which declares that research institutions should allow access to primary materials and data, except when legal and ethical reasons

## ESTONIA (EE)

Responsibility for research data lies with the Estonian Research Council, who host a webpage dedicated to it (in English<sup>159</sup>). Their report "Open Science in Estonia - Open Science Expert Group of the Estonian Research Council, Principles and Recommendations for Developing National Policy"<sup>160</sup> outlines the current state of play. The expert committee behind this report comprise representatives of government ministries, Estonian universities and the national library, so here again we see an example of a collaborative, consultative and collegiate approach.

In late 2019 the Ministry of Education and Research started the development of an Open Science Roadmap, which is expected to result in a policy in two years, as well as the establishment of an Estonian Open Science Competence Centre as a support system for OS in Estonia.<sup>161</sup>

The document is wide-ranging in terms of its scope, covering publications, data, code and methodologies, and addresses the relationship between data and OA publications. It is not a mandate as such, but rather lays out a series of (fairly strongly worded) recommendations for a national policy. Skills are explicitly addressed, with responsibility for developing researcher abilities and understanding placed at the door of the research libraries. As in the Danish

---

<sup>157</sup> NordForsk Open Access to Research Data – Status, Issues and Outlook.

[https://old.nordforsk.org/en/publications/publications\\_container/open-access-to-research-data-2013-status-issues-and-outlook](https://old.nordforsk.org/en/publications/publications_container/open-access-to-research-data-2013-status-issues-and-outlook)

<sup>158</sup> Danish Code of Conduct for Research Integrity. <https://ufm.dk/en/publications/2014/files-2014-1/the-danish-code-of-conduct-for-research-integrity.pdf>

<sup>159</sup> Estonian Research Council webpage on research data - English version.

<http://www.etag.ee/en/activities/horizontal-topics/open-science/http://www.etag.ee/en/activities/horizontal-topics/open-science/>

<sup>160</sup> Open Science in Estonia - Open Science Expert Group of the Estonian Research Council, Principles and Recommendations for Developing National Policy. <https://www.etag.ee/wp-content/uploads/2017/03/Open-Science-in-Estonia-Principles-and-Recommendations-final.pdf>

<sup>161</sup> See Estonia OpenAIRE profile for further information. <https://www.openaire.eu/os-estonia>

case, monitoring and compliance are expected to be devolved to individual institutions' policy documents. In practical terms, RDM in Estonia remains a work in progress. Most research projects will deposit their output, including data, with international publishers and third-party service providers. University libraries – such as Tartu and Tallinn - have joined the DataCite consortium and offer data archiving services. Some research centres are also members of CLARIN and DARIAH, and the national data archive for social science data (ESTA) is a CESSDA member.

#### GERMANY (DE)

In Germany, DFG (the main German research funder) has “DFG Guidelines on the Handling of Research Data”<sup>162</sup> which also point towards a set of “Data “developed in partnership between a number of high profile German research organisations and adopted by the Alliance of German Science Organisations in June 2010. The DFG policy focuses on research data, although it also addresses the software and methods necessary for validation and/or replication. It is a hard policy, and does not explicitly address skills or training, but does make reference to the necessity of national infrastructure funding, which could be seen to cover human as well as technical infrastructure. (The accompanying Principles document, an analogue of which the UK also uses in its FAQs, does address skills explicitly.)

As with the Dutch approach, the German policy emphasises the need to formally recognise the effort and time required for data management:

The commitment and efforts of researchers to make research data available, for example the subject-specific further development of the discussion process or the technical possibilities of archiving, evaluating and networking research data should be given greater emphasis in the appraisal of scientific qualifications and achievements.

#### *Additional information*

In 2017 the Helmholtz Association, a union of 18 German scientific-technical and biological-medical research Centres, adopted a position paper on the management of research data<sup>163</sup>. This includes a commitment to “store research data from the Centres within suitable data infrastructures and make them available openly and free of charge for subsequent use by science and society.”

As a member of the G8, together with France, Italy and the UK, Germany is party to the G8 science ministers statement, made in London on 12 June 2013.<sup>164</sup> This statement “proposes to the G8 for consideration new areas for collaboration and agreement on global challenges, global research infrastructure, open scientific research data, and increasing access to the peer-reviewed, published results of scientific research.”

#### GREECE (EL)

Law 4310/2014 supports open access to publicly funded research; however Greece does not have a national Open Access/Open Science policy as of yet. On the 29 and 30 November 2018 OpenAIRE organised a Greek Open Science Symposium<sup>165</sup> which aimed at understanding the current research ecosystem and prioritise actions towards the development of a National Open Science Strategy. Drawn from discussions during the 1st day, a proposal for the reformulation of a National Open Science High Level Task Force under the auspices of the General Secretariat of Research and Technology (GSRT) was made.

---

<sup>162</sup> DFG Guidelines on the Handling of Research Data.

[https://www.dfg.de/en/research\\_funding/proposal\\_review\\_decision/applicants/research\\_data/index.html](https://www.dfg.de/en/research_funding/proposal_review_decision/applicants/research_data/index.html)

<sup>163</sup> Recommendations for guidelines at the Helmholtz centres on handling research data. [https://gfzpublic.gfz-potsdam.de/pubman/faces/ViewItemOverviewPage.jsp?itemId=item\\_4422888](https://gfzpublic.gfz-potsdam.de/pubman/faces/ViewItemOverviewPage.jsp?itemId=item_4422888)

<sup>164</sup> G8 Science Ministers Statement (2013), *op. cit.*

<sup>165</sup> Greek Open Science Symposium. <https://www.openaire.eu/events/eventdetail/573/-/open-science-symposium-in-greece-policies-infrastructures-service>

#### HUNGARY (HU)

No policy is yet in place, but first steps are being taken in Autumn 2017, with the formation of a joint committee on open science. The committee has produced a policy draft which is currently being discussed.

#### LATVIA (LV)

Latvia is currently developing a national Open Science strategy which is planned to be released for public consultation in Q2, 2021 with an aim to approve it in the Cabinet of Ministers by the end of 2021. The draft strategy has a 3-pillar structure: open access, FAIR data and citizen science. The strategy covers incentives and rewards, e-infrastructures and tools, skills, monitoring, and state-of-the-art open science resource development.

#### LUXEMBOURG (LU)

Luxembourg has had a National Policy on Open Access<sup>166</sup> since 2015, which focuses on open access to publications. The national research funder (FNR) is a strong supporter of OA and led the policy's adoption. FNR have had an OA policy since 2017 and have now adopted a new policy based on Plan S starting from 2021, along with a policy on, which applies to all FNR funded projects where funding decision was made after 1<sup>st</sup> January 2021. This policy is aligned with the Core Requirements for Data Management Plans as defined by Science Europe in their Practical Guide to the International Alignment of Research Data Management<sup>167</sup>.

The Open Science Forum was held by OpenAIRE in Luxembourg in November 2018 and ahead of the event a working group consisting of stakeholders including CEOs from Luxembourg research institutions, as well as researchers and representatives from OpenAIRE, gathered to discuss a Luxembourg National Plan for Open Science. This working group will define a Luxembourg-wide plan for open access to science. Five principles, including publications in open access journals, making data openly available, developing infrastructure, as well as making adjustments to how researchers and proposals are evaluated with a focus on open science practice, will be at the heart of the open science plan for Luxembourg.

#### MALTA (MT)

Malta does not have a national Open Access/Open Science policy. Open Access to publicly funded research is anchored within Malta's National Research and Innovation Strategy 2020. There is work underway to compile a National Open Science Policy for Malta, which is currently being undertaken by The University of Malta (UM) Library and MCST and other national stakeholders. Malta has been granted support<sup>168</sup> under the H2020 Policy Support Facility so as to develop and implement a National Open Access Policy. The University of Malta adopted an Open Access Policy<sup>169</sup> which was approved by Senate on 20th September, 2017 but this focuses solely on open access to publications.

#### POLAND (PL)

An initial document on the future of OA in Poland was published in 2015 with the title "Directions of the development of open access to research publications and research results in Poland. The document addresses data briefly, in a single paragraph stating that, in line with EC recommendations, Open Access should also be extended to research data, and recommends that research institutions and individual researchers should open research data taking into consideration world trends and best practices. These recommendations are non-binding.

---

<sup>166</sup> National Policy on Open Access. <http://storage.fnr.lu/index.php/s/O4DDe2SgEL0N9J5>

<sup>167</sup> Science Europe's Practical Guide to the International Alignment of Research Data Management. <https://scienceeurope.org/our-resources/practical-guide-to-the-international-alignment-of-research-data-management/>

<sup>168</sup> Specific Support to Malta – "Open Access: an opportunity for Malta"  
Recommendations for the Development of a National Policy for Open Access to publications, research data and related issues

[https://rio.jrc.ec.europa.eu/sites/default/files/report/SS%20Malta\\_Final%20Report.pdf](https://rio.jrc.ec.europa.eu/sites/default/files/report/SS%20Malta_Final%20Report.pdf)

<sup>169</sup> Malta's Open Access Policy. <https://www.um.edu.mt/library/oar/handle/123456789/20022>

In parallel, the Polish Ministry of Science and Higher Education has also undertaken to:

- Analyse how data are processed, preserved, curated and shared in the Polish research environment;
- Identify best practices, strategies and policies for Open Data worldwide;
- Consult with key stakeholders to identify noteworthy differences between specific disciplines.<sup>170</sup>

In April 2018, 'Report on Open Access Policy in Poland' along with guidelines and educational materials on Open Access was published by the Ministry, which summarises OA efforts for the last two years, which has been hindered by a number of barriers such as lack of resources and systematic approach. The Ministry has declared that a new Open Access policy will be published.

#### PORTUGAL (PT)

A preparation of a National Policy for Open Science is underway in Portugal. The work is initiated by the Government and Ministry for Science, Technology and Higher Education (MCTES). The website<sup>171</sup> set up for Open Science in Portugal, describes the three pillars of the policy to be: (1) transparency in practices, methodology, observation and data collection, (2) public availability and re-use of scientific data, (3) public access and transparency in scientific communication, (4) use of web-based tools to facilitate scientific collaboration.

FCT (the national research funder) has a policy on management and sharing of data and other results arising from FCT-funded research<sup>172</sup>. In practice this is a general, aspirational call for researchers to share their data, and not a mandatory policy. The policy document is brief, at under two pages in length, and very much on the soft (suggest and encourage) end of the scale. It "encourages researchers to make available the data resulting from R&D projects it finances in appropriate Open Access databases, where possible," with scope for opting out if the nature of the data does not lend itself to open sharing. The focus is on sharing data (and other research outputs, such as samples and software models) "*with other researchers.*" [our italics]

The policy suggests that a data management plan should be produced, proposing a basic template/table of contents, and that best practice be followed for whichever scientific discipline the research sits closest to. The only mandatory element of the policy is that FCT must be credited as a funder of any dataset made openly available. Skills are not addressed in the document, and – given the soft, aspirational approach – compliance is not covered either, but the document is clear that the policy will continue to be developed in order to "converge with international best practices, in particular with the initiatives of this domain that may be established within the European Union."

#### ROMANIA (RO)

Currently, Romania does not have a national Open Access/ Open Science policy although discussions are underway with various stakeholders with the view to develop one. Open Access is however mentioned in The National Plan for Research and Innovation 2015-2020.

In 2019, the UEFISCDI (Executive Agency for Higher Education, Research, Development and Innovation Funding<sup>173</sup>) in partnership with the Ministry of Education and Research have started a process of developing a national strategic framework for Open Science. The process is led by Open Science Hub Romania<sup>174</sup> who is also the Romanian OpenAIRE NOAD. The OpenAIRE Romania NOAD will start implementing a project financed through European structural funds which includes a strong component dedicated to the elaboration of a proposal for an Open Science national strategy. In late 2018, the Romanian Government did approve the 2018-2020 National Action Plan. The Plan includes a commitment which aims to lead to the adoption of a national Open Access strategy to research results, by implementing pilot programs and substantiating Open Government Partnership research and public consultations. The institution in charge with this activity is the Romanian Ministry of Research and Innovation.

SWEDEN (SE)

---

<sup>170</sup> Further information is available in the blog post at <https://www.openaire.eu/blogs/poland-initial-open-access-policy-1>

<sup>171</sup> <https://www.ciencia-aberta.pt/about-open-science>

<sup>172</sup> Policy on management and sharing of data and other results arising from FCT-funded research [https://www.fct.pt/documentos/PoliticaAcessoAberto\\_Dados.pdf](https://www.fct.pt/documentos/PoliticaAcessoAberto_Dados.pdf)

<sup>173</sup> UEFISCDI Executive Agency for Higher Education, Research, Development and Innovation Funding. <https://uefiscdi.gov.ro>

<sup>174</sup> Open Science Hub Romania. <https://uefiscdi.gov.ro/open-science-hub>



While no policies are yet in place, the Swedish Research Council (Vetenskapsrådet, VR) published a “Proposal for National Guidelines for Open Access to Scientific Information”<sup>175</sup> in January 2015. This proposal includes a section on Guidelines for Open Access to publications, and a description of a process towards providing Open Access also to research data. The intention is that all research data, produced in whole or in part through public funding, should be made openly available as soon as possible, with the default responsibility for archiving and preservation of data falling on the shoulders of the Swedish HEIs, with pathfinder work currently underway coordinated by the Swedish Research Council (in a similar way to the National Library’s coordination of Open Access implementation. (Source: NordForsk (2016), op. cit.)

In 2017 VR received the Swedish government’s assignment to coordinate the national implementation of open access to research data. This will be carried out in conjunction with the National Library of Sweden and the National Archive of Sweden. VR intends to be a driving actor for policies regarding open access to research data, particularly with regard to developing guidelines and generating incentives for researchers to make their research data open.

In 2018 VR received the assignment from the Swedish Government to develop criteria assessing the extent to which research data, partly or fully resulting from public funding, complies with the so-called FAIR principles. The results are reported in the report Criteria for FAIR Research Data (in Swedish, which also gives recommendations on how to achieve FAIR research data in Sweden.

#### 6.4 Selected non-EU countries

##### ICELAND (IS)

Discussions on Open Access to research data have recently been initiated both within the Ministry of Education, Science and Culture and at the National and University Library, and awareness of the importance of issues relating to open access to digital research results, especially for smaller countries, is growing. The Ministry of Education set up a working group late 2019 who should focus on developing a policy on open science in accordance with the strategic plan for Icelandic higher education and research for the years 2017–2021. The importance of structured data management and open access to research data is likely to be included there. Currently, no requirements on (e.g.) providing a data management plan are imposed when applying for a grant in the public competitive funds. (Source: NordForsk (2016), op. cit.)

The Norwegian National Strategy on Access to and Sharing of Research Data<sup>176</sup> was published in December 2017 and “states three basic principles for publicly funded research data in Norway:

- Research data should be as open as possible and as closed as necessary.
- Research data should be processed and adapted in such a way that the content of the data can be exploited in the best possible way.
- Decisions on archiving and facilitating research data must be taken in the research communities.

The Government established a new directorate (UNIT) in 2017 that, in addition to offering services, will also coordinate and harmonise IT services, increase synergies, reduce duplication of efforts and oversee the implementation of the aforementioned principles.”<sup>177</sup>

---

<sup>175</sup> Swedish Research Council Proposal for National Guidelines for Open Access to Scientific Information.  
<https://www.vr.se/english/analysis/reports/our-reports/2015-03-02-proposal-for-national-guidelines-for-open-access-to-scientific-information.html>

<sup>176</sup> Norwegian National Strategy on Access to and Sharing of Research Data.  
[https://www.regjeringen.no/contentassets/3a0c3eaa1c9b4611a1b86fc5616abde7/en-gb/pdfs/national-strategy-on-access\\_summary.pdf](https://www.regjeringen.no/contentassets/3a0c3eaa1c9b4611a1b86fc5616abde7/en-gb/pdfs/national-strategy-on-access_summary.pdf)

<sup>177</sup> NEIC (2018) The State of Open Science in the Nordic Countries: Enabling data-driven science in the Nordic countries. A report by Anders O. Jaunsen for NEIC, September 2018, p. 13. Available online:  
[https://www.nordforsk.org/sites/default/files/2020/The\\_state\\_of\\_open\\_science\\_in\\_the\\_Nordic\\_countries\\_Single.pdf](https://www.nordforsk.org/sites/default/files/2020/The_state_of_open_science_in_the_Nordic_countries_Single.pdf)



The Research Council Policy for Open Science<sup>178</sup> has been developed by Research Council Norway and implemented from January 2020. It outlines measures for a well-functioning science system, namely: OS skills and expertise; OA publications; making research data accessible; data infrastructures for OS; career development and research assessment and transparency in funding and assessment processes.

#### SERBIA (RS)

In 2020 The Ministry of Education, Science and Technological Development (MESTD), adopted new Law on Science and Research<sup>179</sup> (in Serbian) which shows a commitment to Open Science. In one of the introductory articles (Article 4) the law states that "conducting research work in accordance with the principles of open science" is recognized as a fundamental principle of science and research.

Article 6 is furthermore entirely dedicated to open science, as follows:

- In order to increase the quality and visibility of scientific work, research is conducted in accordance with the principles of open science, with optimal use of scientific research infrastructure.
- The principle of open science and open access to scientific publications and research data is based on the recommendations of the European Commission and international good practice.

Serbia adopted a national science policy called 'Open Science Platform'<sup>180</sup> in July 2018. The which is also the main research funder in Serbia developed and published the policy, which is the national OA policy. The PASTEUR4OA and OpenAIRE projects contributed during the drafting phase.

The policy sets out the basic requirements for the depositing procedures, responsibilities for training, administration, monitoring the efficiency of OA policies, etc., but details will be set out in institutional policies. According to the policy, universities and research institutes should define and adopt their open science platforms within six months. Progress and compliance will be monitored by the Ministry. The overall focus of the policy is on OA publications resulting from MESTD research funding, which should now be mandatory (Green OA). Open research data is not mandated but recommended. The policy furthermore specifies instances where data should not be shared.

#### SWITZERLAND (CH)

As Switzerland is a federacy, a national policy will most likely never be created. However, a strategy<sup>181</sup> is being agreed, for open research data in 2021, by The State Secretariat for Education, Research and Innovation (SERI), swissuniversities, the Swiss National Science Foundation (SNSF) as well as the two federal universities ETH and EPFL. In 2019 Swissuniversities, the common voice of Swiss Universities, published Open Access guidelines, which refer to publications only. In October Swissuniversities<sup>182</sup> were commissioned by the State Secretariat for Education, Research and Innovation (SERI) to extend the National Strategy on Open Access to Open Research Data and to coordinate stakeholder activities with the Swiss National Science Foundation (SNSF), SWITCH and the Swiss Data Science Centre (SDSC).

In 2013 the programme "Scientific information: access, processing and safeguarding," initiated by the Rectors' Conference of Swiss Universities (Program SUC 2013-2016 P-2), addresses research data in its "White Paper for a Swiss Information Provisioning and Processing Infrastructure 2020"<sup>183</sup>. The Swiss approach is the least "policy-like" of the documents examined, and the most like a project plan. Labelled as a white paper and led by the umbrella group representing the heads of the Swiss universities, the document is wide-ranging in scope, addressing data amongst a number of other ICT infrastructure issues, including Open Access publications. It is difficult to categorise

---

<sup>178</sup> Research Council Norway's Policy for Open Science <https://www.forskingsradet.no/en/Adviser-research-policy/open-science/policy-for-open-science/>

<sup>179</sup> Serbian Law on Science and Research. <http://www.mpn.gov.rs/wp-content/uploads/2019/07/Zakon-onauci.pdf>

<sup>180</sup> Serbian Open Science Platform. <http://www.mpn.gov.rs/wp-content/uploads/2018/07/Platforma-za-otvorenu-nauku.pdf>

<sup>181</sup> SNF blog post on preparations for a national strategy for open research data.

<http://www.snf.ch/en/researchinFocus/newsroom/Pages/news-200409-national-strategy-on-open-data.aspx>

<sup>182</sup> Swissuniversities. <https://www.swissuniversities.ch/en/topics/digitalisation/open-science>

<sup>183</sup> Swissuniversities White Paper for a Swiss Information Provisioning and Processing Infrastructure 2020. [https://www.swissuniversities.ch/fileadmin/swissuniversities/Dokumente/Organisation/SUK-P/SUK\\_P-2/WhitePaper\\_V1.1-EN.pdf](https://www.swissuniversities.ch/fileadmin/swissuniversities/Dokumente/Organisation/SUK-P/SUK_P-2/WhitePaper_V1.1-EN.pdf)

this document as hard or soft, as it is more of a project plan, setting out what will be done. Non-compliance does not seem to be a likelihood, although reference is made to a potential future monitoring role for the Swiss National Science Foundation (SNSF). Further to this, in 2017 the SNSF released its Research Policy on Open Research Data<sup>184</sup>, in which it states that the SNSF expects all researchers to store their research data, to share the research data (unless there are ethical or legal reasons not to do so) and to deposit their data and metadata into repositories in re-usable formats, where they are open and easily findable.

#### UNITED KINGDOM (UK)<sup>185</sup>

The UK does not have a single national funder for research. The largest funder for research in the UK is UK Research and Innovation (UKRI), a non-departmental public body sponsored by the Department for Business, Energy and Industrial Strategy (BEIS) which was established in 2018. UKRI brings together the seven disciplinary research councils (formerly RCUK), Research England and Innovate UK. Each research council has its own data policies which grant-holders must follow.

The research councils, formerly RCUK, published the Common Principles on Data Policy<sup>186</sup> in 2011 which apply to all research funding opportunities. Guidance on best practice in the management of research data 2015<sup>187</sup> (updated 2018) is available to guide the interpretation of these common principles, independent of the specific data policy of the research council(s) that may be funding a particular project. The common data principles build on the Organisation for Economic Co-operation and Development (OECD) publication entitled 'Principles and Guidelines for Access to Research Data from Public Funding'. The common principles bring the data policies of the individual research council policies<sup>188</sup> together and help grant-holders understand the expectations. UKRI is currently considering the revisions to data policy and guidance. The updated version of the OECD's 2006 Recommendation on Access to Research Data from Public Funding will be an input to this.

UKRI is signatory to the Concordat on Open Research Data<sup>189</sup> 2016. The concordat has been developed by a UK multi-stakeholder group. This concordat will help to ensure that the research data gathered and generated by members of the UK research community is made openly available for use by others wherever possible in a manner consistent with relevant legal, ethical, disciplinary and regulatory frameworks and norms, and with due regard to the costs involved.

UKRI engages actively with national and international initiatives on open research data and is taking a leading and coordinating role in overseeing the development of open research data policies, infrastructure and services as outlined in the final report of the Open Research Data Taskforce<sup>190</sup> 2018. The Task Force has sought to build on the principles set out in the Concordat on Open Research Data, and to take account of wider moves towards open research data within the international landscape. UKRI is engaged with European open science and open data initiatives such as the European Open Science Cloud and Horizon Europe, and international forums such as the Research Data Alliance.

UKRI-funded researchers are required to, where applicable, to include a statement on how underlying research materials, such as data, samples or models, can be accessed when publishing research outputs in-scope of the RCUK Open Access Policy<sup>191</sup> 2013.

The Research Excellence Framework (REF), the UK system for assessing the quality of research in UK higher education institutions is jointly governed by the UK higher education (HE) funding bodies, comprising Research England, the Scottish Funding Council, the Higher Education Funding Council for Wales and the Department for the

---

<sup>184</sup> SNSF Research Policy on Open Research Data. [http://www.snf.ch/en/theSNSF/research-policies/open\\_research\\_data/Pages/default.aspx](http://www.snf.ch/en/theSNSF/research-policies/open_research_data/Pages/default.aspx)

<sup>185</sup> The United Kingdom left the European Union on 31<sup>st</sup> January 2020 and here counted along with non-EU countries for the first time

<sup>186</sup> <https://www.ukri.org/apply-for-funding/before-you-apply/your-responsibilities-if-you-get-funding/making-research-data-open/>

<sup>187</sup> <https://www.ukri.org/wp-content/uploads/2020/10/UKRI-221020-guidance-on-best-practice-management-of-research-data.pdf>

<sup>188</sup> [https://read.oecd-ilibrary.org/science-and-technology/oecd-principles-and-guidelines-for-access-to-research-data-from-public-funding\\_9789264034020-en-fr#page1](https://read.oecd-ilibrary.org/science-and-technology/oecd-principles-and-guidelines-for-access-to-research-data-from-public-funding_9789264034020-en-fr#page1)

<sup>189</sup> <https://www.ukri.org/wp-content/uploads/2020/10/UKRI-020920-ConcordatOnOpenResearchData.pdf>

<sup>190</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/775006/Realising-the-potential-ORDTF-July-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/775006/Realising-the-potential-ORDTF-July-2018.pdf)

<sup>191</sup> <https://www.ukri.org/wp-content/uploads/2020/10/UKRI-020920-OpenAccessPolicy.pdf>

Economy Northern Ireland. Research England is part of UKRI. For REF 2021, the sub-panels will assess the research environment and contribution to the vitality and sustainability of the wider discipline or research base. This includes progress towards an open research environment, open access policy requirements, and wider activity to encourage the effective sharing and management of research data.

#### Additional information

UKRI's research councils data policies: Arts and Humanities Research Council (AHRC)<sup>192</sup>; Biotechnology and Biological Sciences Research Council (BBSRC)<sup>193</sup>; Engineering and Physical Sciences Research Council (EPSRC)<sup>194</sup>; Economic and Social Research Council (ESRC)<sup>195</sup>; Medical Research Council (MRC)<sup>196</sup>; Natural Environment Research Council (NERC)<sup>197</sup>; and Science and Technology Facilities Council (STFC)<sup>198</sup>.

As a member of the G7 (formerly G8) the UK is party to the G8 Science Ministers Statement<sup>199</sup>2013. The statement "proposes to the G8 for consideration new areas for collaboration and agreement on global challenges, global research infrastructure, open scientific research data, and increasing access to the peer-reviewed, published results of scientific research."

There are several initiatives to develop common interfaces and data standards. For example, Jisc, a national agency to support universities and colleges, has set up data management shared services to ensure that research organisations avoid any additional costs by sharing practices, solutions and standards, making research sharing easier to implement. Jisc, working with the research sector (e.g. ARMA, UUK, RLUK, SCOUNL, UCISA), the Digital Curation Centre and the Software Sustainability Institute help to support practice development via advocacy, training and tools for researchers and research organisations.

Wellcome is an important charitable research funder in the UK and has its own data policy<sup>200</sup>.

#### Other Government Departments

The Department for International Development (DFID) published an Open and Enhanced Access policy<sup>201</sup> for the research that it funds, published in 2013.

The Department for Environment, Food and Rural Affairs (Defra) published an Open Data Strategy<sup>202</sup> in 2013, which provides a set of principles that will be applied by the Department for Environment, Food and Rural Affairs and its arms-length bodies to embed transparency and the publishing of data.

The National Institute for Health Research (NIHR) is funded by the Department of Health and Social Care, published a statement outlining the NIHR position on the sharing of research data<sup>203</sup> in 2019.

---

<sup>192</sup> <https://ahrc.ukri.org/about/policies/>

<sup>193</sup> <https://bbsrc.ukri.org/about/policies-standards/>

<sup>194</sup> <https://epsrc.ukri.org/about/standards/researchdata/>

<sup>195</sup> <https://esrc.ukri.org/funding/guidance-for-grant-holders/research-data-policy/>

<sup>196</sup> <https://mrc.ukri.org/research/policies-and-guidance-for-researchers/open-research-data-clinical-trials-and-public-health-interventions/>

<sup>197</sup> <https://nerc.ukri.org/research/sites/environmental-data-service-eds/policy/>

<sup>198</sup> <https://stfc.ukri.org/about-us/our-purpose-and-priorities/requesting-information-from-uk-research-and-innovation/scientific-data-policy/>

<sup>199</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/206801/G8\\_Science\\_Meeting\\_Statement\\_12\\_June\\_2013.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/206801/G8_Science_Meeting_Statement_12_June_2013.pdf)

<sup>200</sup> <https://wellcomeopenresearch.org/for-authors/data-guidelines>

<sup>201</sup> <https://www.gov.uk/government/publications/dfid-research-open-and-enhanced-access-policy>

<sup>202</sup> <https://www.gov.uk/government/publications/defra-open-data-strategy>

<sup>203</sup> [https://www.nihr.ac.uk/documents/nihr-position-on-the-sharing-of-research-data/12253#Sharing\\_Research\\_Data](https://www.nihr.ac.uk/documents/nihr-position-on-the-sharing-of-research-data/12253#Sharing_Research_Data)

## 7. Looking forward

The Covid-19 crisis highlighted the importance of Open Science and calls to action by governments, funders, charities and other organisations to provide immediate access to research data led to multiple vaccines being developed in record time. The European Commission, with its Directive on Open Data and the Re-use of Public Sector Information (PSI Directive), R&I Framework Programme Horizon Europe and the new ERA for Research and Innovation, has demonstrated its continued commitment to facilitating Open Science and making it the norm for research communities.

The ongoing activities of the regional INFRAEOSC projects and related EOSC Task Forces to support Open Science policy development, harmonisation and monitoring are helping Member States and other countries in the EEA to embrace Open Science at the national level. With their focus on both openness and FAIR, these initiatives will help to dispel confusion over these two related but separate concepts and support the practical implementation of the FAIR principles within national and international policy frameworks.

SPARC Europe and DCC will continue to monitor the policy landscape and the next update of this report is planned for October 2021. Prior to the next update, a review of the format of these reports will be carried out to ensure that the information is made most useful to policymakers and other relevant stakeholders across Europe and beyond. SPARC Europe and DCC welcome ideas on how to improve this series of reports. To get involved or to provide suggestions, please contact the DCC on [info@dcc.ac.uk](mailto:info@dcc.ac.uk).

## 8. Acknowledgements

Many thanks are due to several colleagues from across Europe who have helped to identify relevant policy changes or confirmed their absence: the 'Additional Information' sections are largely down to information and insight that they provided. Thanks in particular are due to Najila Rettberg for reaching out to the OpenAIRE NOADs, to Volker Beckmann, Anthony Ross-Hellauer and Anja Oberlaender (Austria & Germany), Myriam Mertens and Gwen Franck (Belgium), Milena Dobрева (Bulgaria & Malta), Anton Gerunov (Bulgaria), Vasiliki Koukounidou (Cyprus), Lenka Nemeckova and Michal Růžička (Czech Republic), Jesper Boserup Thestrup (Denmark), Raivo Ruusalepp and Priit Tamm (Estonia), André Dazy (France), Victoria Tsoukala, Marina Angelaki and Elli Papadopoulou (Greece), Gyöngyi Karácsony (Hungary), Anna Sigríður Guðnadóttir (Iceland), Breeda Herlihy and Niamh Brennan (Ireland), Paola Gargiulo and Liise Lehtsalu (Italy), Daina Ostrovska (Latvia), Gintare Tautkevičienė (Lithuania), Ryan Scicluna (Malta), Ingrid Dillo, Marjan Grootveld, Just de Leeuwe and Elly Dijk (Netherlands), Jens Harald Aasheim (Norway), Lidia Stępińska-Ustasiak (Poland), Eloy Rodrigues (Portugal), Ioana Spanach (Romania), Biljana Kosanovic (Serbia), Reme Melero (Spain), Irena Vipavc Brvar, Janez Štebe and Mojca Kotar (Slovenia), Beate Eellend (Sweden), André Hoffmann (Switzerland), Silvia Horakova (Slovakia), Iryna Kuchma (EIFL), Marlène Delhaye and Marin Dacos (France), Gerda McNeill (NOAD) and Katharina Rieck (Austria), Alexandra Vandervelde (Belgium), Alexander Blums (Latvia), Jonathan England (Luxembourg) Asger Væring Larsen and Anne Thorst Melbye (Denmark), Tahia Zaidi (UK). Thanks to Abigail McBirnie (ExPaNDs), Sophie Severan (PanOSC), Elena Toli (NI4OS), Emma Lazzeri, Sara Di Giorgio, Elen Giglia and Jos van Wezel (EOSC Pillar).

We gratefully acknowledge that, for this update, we have cooperated with the FAIRsFAIR project on collecting and analysing the policy data.

***This work was commissioned by SPARC Europe, co-financed by SPARC Europe and the Digital Curation Centre (DCC), and carried out by DCC.***