# CESSDA Data Access Policy

## Version 2

Approved by the CESSDA General Assembly on 22 June 2022

## Executive Summary

The CESSDA Data Access Policy has been developed to provide a set of principles for CESSDA Service Providers (SPs) covering common standards for the provision of data and metadata access. The policy also aims to demonstrate CESSDA's commitment to open science while protecting both privacy and intellectual property rights. The policy was first published in 2016 and was updated in 2022 to cover new developments in legislation and standards covering data access; to reflect current needs and requirements for data access in the social science community; and as membership of CESSDA grows, to ensure its relevance across a wider range of SP organisations.

## Abbreviations and Acronyms

| CDC | CESSDA Data Catalogue |
|---|---|
| CESSDA | Consortium of European Social Science Data Archives |
| CMM | CESSDA Metadata Model |
| CMV | CESSDA Metadata Validator |
| CV | Controlled Vocabulary |
| DDI | Data Documentation Initiative |
| EQB | CESSDA Euro Question Bank |
| FAIR | Findability, Accessibility, Interoperability, Reusability |
| MDO | CESSDA Metadata Office |
| PID | Persistent Identifier |
| SP | Service Provider |

# CESSDA Data Access Policy

## Principle 1

All publicly funded metadata of each CESSDA Service Provider (SP) should be available to anyone regardless of status, nation or type of use, unless there are known requirements that prevent this. In accordance with the FAIR principles, study-level metadata records should remain available even after data are withdrawn.

## Principle 2

All publicly funded data of each CESSDA SP should be available to anyone regardless of status, nation or type of use, unless there are known requirements (such as access conditions agreed between the Data Owner and the SP) which prevent this.

## Principle 3

An agreement between the SP and the Data Owner covering data access arrangements must be in place for each data collection within each SP's holdings.

## Principle 4

All SPs will work towards making their data holdings compliant with the FAIR principles (Findable, Accessible, Interoperable and Reusable).

## Principle 5

SPs are required to offer their metadata for harvesting to the CESSDA services. For interoperability of the metadata, SPs must use the controlled vocabularies recommended by CESSDA.

## Principle 6

Catalogue metadata for each data collection in SPs' holdings must include a persistent identifier (PID) in accordance with the CESSDA PID Policy and the FAIR principles. SPs must also make clear to the end user how each data collection should be formally referred to upon reuse.

## Principle 7

Access conditions must be clearly displayed in the catalogue metadata record for each data collection in each SP's holdings, stating whether the data collection is open to all or if access is restricted in some way.

## Principle 8

Metadata harvested by CESSDA will be made available for harvesting to third parties. As noted in Principle 1, metadata should remain available even after data are withdrawn.

# Background and general information

The CESSDA Data Access Policy has been developed to provide a set of principles for CESSDA Service Providers (SPs) covering common standards for the provision of data access. The policy is based on the CESSDA Statutes[1] guidance on data access (specifically, Article 14). The policy also aims to demonstrate CESSDA's commitment to Open Science while protecting the privacy of data subjects and intellectual property rights of the Data Owners[2].

This document comprises Version 2.0 (2022) of the CESSDA Data Access Policy. The first version of the policy was published in 2016. The updated version was developed by the CESSDA Metadata Office (MDO) 2021-22 as the Deliverable D10 'Final policy document of CESSDA Data Access policy'. The draft update was opened to SPs for consultation after the CESSDA Service Providers' Forum (SPF) in October 2021 and then again for final comments after the following SPF in April 2022. All comments and feedback were incorporated before finalisation of the updated policy in May 2022.

# Revisions and amendments made in Version 2

Since the last version was published, new developments concerning the needs and requirements for data access in the social science community have arisen. They include the FAIR data principles[3] (Findable, Accessible, Interoperable and Reusable) and other external initiatives that CESSDA needs to comply with, such as the General Data Protection Regulation (GDPR)[4], the EU's Open Science Policy[5], and CESSDA's own developments, such as the CESSDA PID Policy[6]. All need to be reflected in the Data Access Policy. Also, new SPs have joined CESSDA since the last version was published. The policy therefore needs to be updated to ensure it is relevant across a range of different SP organisations.

The main changes are as follows:

- The language used has been simplified and clarified.
- The list of principles has been shortened from 14 to eight. This avoids repetition and allows the policy to concentrate on common areas of collaboration, such as Open Science, metadata practice and standards, where CESSDA's role is greatest.

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[1] See the STATUTES of CESSDA ERIC at https://www.cessda.eu/About/Governance/Statutes

[2] See role definitions for Data Owners and others in section 3.

[3] FAIR principles, https://www.go-fair.org/fair-principles/ , accessed 17 February 2022.

[4] General Data Protection Regulation, https://www.gdpreu.org/, accessed 24 February 2022.

[5] The EU's open science policy, https://ec.europa.eu/info/research-and-innovation/strategy/strategy-2020-2024/our-digital-future/open-science_en#the-eus-open-science-policy

[6] Hausstein, Brigitte; Horton, Laurence (2022). CESSDA ERIC Persistent Identifier Policy 2022 (Version 2.1). Zenodo. https://doi.org/10.5281/zenodo.6607000

- Flexibility has been added in areas such as licensing, so that SPs can follow the laws and practises in their own countries.
- New background developments that inform the policy (FAIR, the EU Open Science policy, GDPR, etc.) have been taken into consideration. Where these affect individual principles, advice and background information has been provided in the implementation notes.
- New developments that directly affect requirements for data access (e.g., the FAIR principles) have been incorporated.
- The requirements placed on SPs by the CESSDA PID Policy have been included.
- The implementation notes have been (where possible) shortened, amended and where necessary extended, in compliance with the adapted principles.

## A note on roles: Data Owners, Data Creators and Data Controllers

Terms used for roles around the ownership and control of data can be confusing. Some roles relevant here, such as 'Data Controller' are defined in GDPR[7], whereas others (such as Data Owner, Data Creator, Data Distributor, etc.) are more commonly used in data repository/archive management.

- The term 'Data Owner' is used in this document to define the rights holder of the data. It may refer to a person or organisation.
- The 'Data Creator' is the entity who actually creates the data.
- The 'Data Controller' is defined in GDPR as 'the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data'.

The Data Owner, Data Creator and Data Controller may, or may not, be the same entity, so it is important to mention all three roles here.

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[7] GDPR Data Controllers and Data Processors are defined at https://www.gdpreu.org/the-regulation/key-concepts/data-controllers-and-processors/, accessed 18 February 2022. (While GDPR Data Processors are also important for repository/archive management, they are not directly relevant to this document and so not included here.)

# Implementation Notes for the Principles

## Principle 1

*Principle 1: All publicly funded metadata of each CESSDA Service Provider (SP) should be available to anyone regardless of status, nation or type of use, unless there are known requirements that prevent this. In accordance with the FAIR principles, study-level metadata records should remain available even after data are withdrawn.*

At the very least, the titles and other key metadata of the data collections in the holdings of each SP should be publicly available if possible. This principle represents and encourages FAIR-compliant metadata practice among SPs and reflects the CESSDA Statutes[8]. When a data collection is withdrawn, a study-level metadata record should remain available (sometimes referred to as a 'tombstone page'). This means a record of its existence is maintained; its persistent identifier still has a location to resolve to; and users may still find publications, researchers, etc. associated with the data (see FAIR principle A2[9]). Where SPs operate a data deletion or 'takedown' policy, it should cover the retention of study-level (and any other available) metadata.

SPs generally have more control over the availability of metadata than data (see implementation notes for Principle 2 below), though some variable-level metadata, such as psychological tests, may be subject to restrictions. In addition, commercial for-profit use of metadata may not be permitted. If there is a known requirement that prevents metadata for certain collections being publicly available, SPs should provide some explanatory text on their website which explains their non-conformance to this principle in those cases. Where SPs hold data for preservation purposes only, a public metadata record should still be provided to help identify the collection.

Metadata should be available free of charge at the point of use where possible. SPs can still charge for administrative services they may provide for additional handling of the metadata (e.g., copying it to a device, posting it, etc.).

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[8] CESSDA Statutes, Article 14,
https://www.cessda.eu/content/download/1466/20924/file/STATUTES%20ERIC%20CESSDA%20UPD%2014.01.2022.pdf, accessed 24 February 2022.
[9] A2: Metadata should be accessible even when the data is no longer available, https://www.go-fair.org/fair-principles/a2-metadata-accessible-even-data-no-longer-available/, accessed 17 February 2022.

## Principle 2

*Principle 2: All publicly funded data of each CESSDA SP should be available to anyone regardless of status, nation or type of use, unless there are known requirements (such as access conditions agreed between the Data Owner and the SP) which prevent this.*

This principle represents the ideal situation. In practice, however, CESSDA recognises that the Data Owner is the final arbiter of access conditions, not SPs, who must abide by agreements made with Data Owners. Also, under the FAIR principles, data does not have to mean completely 'open'[10] data, which CESSDA recognises would present problems for SPs. To improve compliance to FAIR and the EU Directive on Open Data and the use and the reuse of public information[11], SPs and Data Owners should agree to make future data deposits 'as open as possible and as closed as necessary'[12] and ideally apply the standardised licences recommended under FAIR[13]. CESSDA acknowledges that it may not be possible to revise agreements already in place for existing data holdings.

The key requirements which may prevent data from being made available for all to re-use include: non-anonymized content including personal data[14]; contractual issues, intellectual property requirements (especially with data that are linked); national security; and commercial sensitivity (see CESSDA Statutes[15] Articles 14(3)m 14(4) and 14(6) respectively). CESSDA assumes that, with regard to anonymisation, privacy and consent, SPs adhere to the GDPR[16] as applied within their country and any additional national legislation. The data should certainly be available for public research and education purposes, but commercial for-profit

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[10] Open data can be defined in slightly different ways. CESSDA prefers to use the term 'intelligent openness' with regard to data, as defined by the UK Royal Society: "Realising the benefits of open data requires effective communication through a more intelligent openness: data must be accessible and readily located; they must be intelligible to those who wish to scrutinise them; data must be assessable so that judgments can be made about their reliability and the competence of those who created them; and they must be usable by others." See The Royal Society (2012), 'Science as an open enterprise', https://royalsociety.org/~/media/Royal_Society_Content/policy/projects/sape/2012-06-20-SAOE.pdf, p.7, accessed 8 June 2021

[11] EU Directive on open data and the use and the reuse of public information, https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=LEGISSUM:4405374, accessed 15 February 2022.

[12] The phrase 'As open as possible, as closed as necessary' is commonly quoted, but an authoritative source is the H2020 Program Guidelines Online Manual, https://ec.europa.eu/research/participants/docs/h2020-funding-guide/cross-cutting-issues/open-access-data-management/open-access_en.htm , accessed 6 September 2021.

[13] R1.1: (Meta)data are released with a clear and accessible data usage license https://www.go-fair.org/fair-principles/r1-1-metadata-released-clear-accessible-data-usage-license/, accessed 21 February 2022.

[14] Pseudonymization of the data does not exempt it from GDPR, see https://www.gdpreu.org/, accessed 24 February 2022..

[15] CESSDA Statutes, ibid.

[16] GDPR, ibid.

use may not be permitted. SPs can also charge for special or value-added services they may provide while handling the data (e.g., copying data to a device, posting it, or maintaining a safe room for on-site data access).

## Principle 3

*Principle 3: An agreement between the SP and the Data Owner covering data access arrangements must be in place for each data collection within each SP's holdings.*

SPs need an agreement, adhering to national law, in place for each data collection[17], to cover redistribution. This agreement protects SPs against any use which the Data Owner (see role definitions above) may object to.

The agreement between the SP and the Data Owner may be limited to a set of terms and conditions, but it is important to ensure that users actively agree to them. The agreement should state who the Data Owner (rights owner) is, and should give the conditions under which the SPs can provide access. Furthermore, it should cover data accessed through an API.

In addition to an access agreement, while mindful of the Creative Commons[18] (CC) goal to remove the barriers of registration where possible, CESSDA recommends that SPs have user registration in place for access to data holdings where possible (this does not apply to metadata, which should be openly available as set out in Principle 1 regardless of the licence applied to the accompanying data)[19].

User registration for data access enables SPs to gather information to help understand and provide evidence for the use and impact of data. This may be mandated by funders and used to create and monitor Key Performance Indicators (KPIs), so it is valuable information. FAIR principle A1.2, covering authentication and authorisation for data access, also notes that 'It often makes sense to request users to create a user account for a repository'[20]. CESSDA recognises, however, that sometimes open download without registration is the only option, for example where data holdings are freely available under a CC or other open licence, or local laws mandate Open Access.

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[17] 'data collection' may also be known as a 'study' or 'dataset' for SSH data, etc.

[18] https://creativecommons.org/ accessed 21 February 2022.

[19] The EU provides a vocabulary that may be a useful reference for SPs when setting access rights with data owners- see Publications Office of the European Union, EU Vocabularies, https://op.europa.eu/en/web/eu-vocabularies/concept-scheme/-/resource?uri=http://publications.europa.eu/resource/authority/access-right, accessed 15 March 2022.

[20] FAIR Principle A1.2: The protocol allows for an authentication and authorisation where necessary, https://www.go-fair.org/fair-principles/a1-2-protocol-allows-authentication-authorisation-required/, accessed 22 February 2022.

## Principle 4

*Principle 4: All SPs will work towards making their data holdings compliant with the FAIR principles (Findable, Accessible, Interoperable and Reusable).*

The FAIR principles[21] for scientific data management and stewardship are based on four goals; namely, to make scientific digital data more Findable, Accessible, Interoperable, and Reusable. The principles provide best practice for data producers and publishers when dealing with data (or any digital object) and their associated metadata (information about that digital object). Adherence to the FAIR principles is imperative in order for CESSDA to remain a leading player in the international scientific community, and is reflected in the aims of the Statutes[22]. The Consortium has included the FAIR principles explicitly in its policy considerations (e.g., the CESSDA PID policy), and its general agenda and strategic development plans. For example, as indicated in the notes for Principle 7 below, CESSDA's plans to create a harmonisation filter for the Data Catalogue to enable users to search by data access category will increase interoperability and compliance with FAIR Principles A1.2[23] and R1.1.[24]

Recently, technical tests have been created to allow the evaluation of the FAIRness of digital objects on the web, such as F-UJI[25] (other tests are in development). The evaluation is performed automatically. The findings include information on how many FAIR tests were passed successfully and why. While individual tests may need some further development, running them can help SPs evaluate their level of FAIRness and provide guidance for needed improvements.

## Principle 5

*Principle 5: SPs are required to offer their metadata for harvesting to the CESSDA services. For interoperability of the metadata, SPs must use the controlled vocabularies recommended by CESSDA.*

The relevant CESSDA services that utilise SPs' harvested metadata are the CESSDA Data Catalogue (CDC) and the CESSDA Euro Question Bank (EQB). SPs should provide their metadata to CESSDA Services using the Data Documentation Initiatives (DDI) standard, and use the DDI profiles provided by the CESSDA Metadata Validator[26] (CMV) for the CDC and

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[21] See footnote 3 above.

[22] CESSDA Statutes, ibid.

[23] FAIR Principle A1.2, ibid.

[24] FAIR Principle R1.1, ibid.

[25] F-UJI Automated FAIR Data Assessment Tool, https://www.fairsfair.eu/f-uji-automated-fair-data-assessment-tool, accessed 24 March 2022.

[26] CESSDA Metadata Validator profiles, https://cmv.cessda.eu/documentation/index.html, accessed 23 February 2022.

EQB. The profiles currently cover DDI-Codebook, DDI-Nesstar, and DDI Lifecycle. Usage notes and element status (mandatory, recommended and optional) are provided with each profile for guidance, so that SPs can ensure their metadata can fit the profile and be accepted into the services. The published CESSDA Metadata Model[27] also provides a comprehensive set of metadata elements to guide SPs' work. However, CESSDA recognises that legacy metadata can be difficult and resource-intensive for SPs to upgrade and so some exceptions from the rule can be allowed. In addition, some metadata held by SPs (such variable and question-level metadata for certain psychological tests) cannot be openly shared.

The use of controlled vocabularies (CVs) allows for interoperability between SPs' metadata and simplifies the use of the CESSDA data portal. Therefore, the use of such CVs leads to greater harmonisation across SPs, aligning closely to the FAIR principles. To facilitate the easy use of CVs in SPs' metadata, the CESSDA Vocabulary Service (CVS) provides a range of CVs for social science metadata in a variety of languages, based on the DDI Alliance controlled vocabularies. Guidance on their use is also provided in the CESSDA Metadata Model (CMM).


## Principle 6

*Principle 6: Catalogue metadata for each data collection in SPs' holdings must include a persistent identifier (PID) in accordance with the CESSDA PID Policy and the FAIR principles. SPs must also make clear to the end user how each data collection should be formally referred to upon reuse.*

As part of the strategy to increase the findability[28] of CESSDA's data holdings, including a PID in each metadata record is mandatory. To provide maximum flexibility to SPs who may be using different recognised identifier systems, the CESSDA Services have been designed to accept several types of recognised and supported PIDs. These are outlined in the CESSDA PID policy.[29]

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[27] Akdeniz, Esra, Borschewski, Kerrin, Moilanen, Katja, Jääskeläinen, Taina, Jakobsen, Morten, Storviken, Silje, Beeken, Jeannine, Bell, Darren, & Bolton, Sharon. (2021). CMM CESSDA Metadata Model (2.0). Zenodo. https://doi.org/10.5281/zenodo.4751455 , with accompanying User Guide: Jakobsen, Morten, Storviken, Silje, Borschewski, Kerrin, Akdeniz, Esra, Moilanen, Katja, Jääskeläinen, Taina, Beeken, Jeannine, Bell, Darren, & Bolton, Sharon. (2021). User Guide for the CESSDA Metadata Model version 2.0 (2.0). Zenodo. https://doi.org/10.5281/zenodo.4672248

[28] FAIR Principle F1: (Meta) data are assigned globally unique and persistent identifiers, https://www.go-fair.org/fair-principles/f1-meta-data-assigned-globally-unique-persistent-identifiers/ , accessed 23 February 2022.

[29] The PIDs currently accepted by CESSDA Tools and Services are: Digital Object Identifier (DOI); Handle (including ePIC-handles); Uniform Resource Name (URN); and Archival Resource Key (ARK). For further information please refer to the CESSDA PID Policy.

As well as providing a stable source reference that remains resolvable over time, the inclusion of a PID is crucial for the citation and referencing of data. Citing data properly using a PID is not only good scholarly practice, giving credit to the data creator and aiding the reproducibility of research, but also means that data and associated metadata remain findable, and so accessible and reusable, even if their location changes. SPs should provide a recommended citation for each data collection, if possible in an interoperable, machine-readable format so that it can be used in bibliographic software.

## Principle 7

*Principle 7: Access conditions must be clearly displayed in the catalogue metadata record for each data collection in each SP's holdings, stating whether the data collection is open to all or if access is restricted in some way.*

In accordance with the FAIR principle A1.2[30] CESSDA requires SPs to provide information on access conditions within the catalogue record for each data collection in its holdings, and CESSDA Statute Article 14(5) notes that "Service Providers shall maintain fair, open and transparent procedures regarding access to the data and metadata in their custody"[31]. The text should state clearly whether prospective users need to meet particular requirements in order to be able to access the data collection, or whether it is open for all to use. The catalogue element covering access conditions should be included in the metadata made available for harvesting for the CDC. To aid interoperability of access conditions, the CDC will in future[32] enable users to filter metadata records by data access type, providing easier retrieval of open data across CESSDA. A flag to cover data access will be included in the CDC metadata profiles to enable SPs to tag their records accordingly.[33]

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[30] FAIR Principle A1.2, ibid.

[31] CESSDA Statutes, ibid.

[32] This requirement was covered in the first version of the Data Access Policy under Principle 11 (Access conditions to data shall, by 2022, be fully interoperable). It was not possible to complete the work by 2022 because additions are needed to the DDI schema in order to create a flag element for the CDC metadata profiles. The DDI Alliance plans to add the elements in the next releases of DDI-Codebook and DDI-Lifecycle, so development can then go forward.

[33] Initially, no detail on the restrictions will be needed for the flag, just an indication that the data are open access, or have some kind of access condition attached. Future development will aim to include more granular filtering by type of access restriction.

## Principle 8

*Principle 8: Metadata harvested by CESSDA will be made available for harvesting to third parties. As noted in Principle 1, metadata should remain available even after data are withdrawn.*

CESSDA will open up the harvested metadata to third parties, such as the European Open Science Cloud (EOSC) portal, following the recommendations in the Open Archives Initiative Protocol for Metadata Harvesting[34] (OAI-PMH) on duplications. SPs are free to make their metadata harvestable to third parties themselves. The reasons for ensuring that a metadata record remains available even when data are withdrawn are set out in the notes for Principle 1 above. Where metadata are harvested by third parties and consumed into systems further removed from CESSDA's and SPs' own catalogues and websites, clear information on provenance and accessibility becomes even more important.

## Author List

| Organisation | Name | Contact information |
|---|---|---|
| UK Data Service | Sharon Bolton | sharonb@essex.ac.uk |

## Peer-review

| Organisation | Name | Contact information |
|---|---|---|
| GESIS - Leibniz Institute for the Social Sciences | Kerrin Borschewski | kerrin.borschewski@gesis.org |

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[34] https://www.openarchives.org/pmh/, accessed 6 September 2021.

# Appendix: Mapping of Version 1 (2016) to Version 2 (2022)

This section provides an indication of the differences between the principles in versions 1 and 2 of the Data Access Policy. In most cases, due to developments and advances both internal and external to CESSDA, the mapping is not exact.

| Version 2 (2022) | Version 1 (2016) |
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| **Principle 1**<br>All publicly funded metadata of each CESSDA Service Provider (SP) should be available, free of charge at the point of use, for public research and education, unless there are known requirements that prevent this. In accordance with the FAIR principles, metadata records should remain available even after data are withdrawn. | *Principle 4:*<br>*All data holdings, documentation and metadata of each service provider shall be available free at the point of access for public research and education.*<br><br>*Principle 5:*<br>*All data holdings of each Service Provider shall be identifiable on the public web.*<br><br>*Principle 7:*<br>*Each data collection shall have documentation which allows its use.* |
| **Principle 2**<br>All publicly funded data of each CESSDA Service Provider (SP) should be available, free of charge at the point of use, for public research and education, unless there are known requirements (such as access conditions agreed between the Data Owner and the SP) which prevent this. | *Principle 2:*<br>*The responsibilities of a user regarding the use of any data collection shall be managed by a licence/agreement between the Service Provider and the user.*<br><br>*Principle 3:*<br>*All data holdings shall be available to anyone regardless of status, nation or type of use (except redistribution) unless there are other known requirements which prevent it.*<br><br>*Principle 4:*<br>*All data holdings, documentation and metadata of each service provider shall be* |

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|---|---|
| | *available free at the point of access for public research and education.* |
| | *Principle 5:* |
| | *All data holdings of each Service Provider shall be identifiable on the public web.* |
| | *Principle 7:* |
| | *Each data collection shall have documentation which allows its use.* |
| | *Principle 8:* |
| | *Documentation shall be accessible without restriction and at no cost unless there are other known requirements which prevent it.* |
| **Principle**         **3**<br>An agreement between the SP and the Data Owner covering data access arrangements must be in place for each data collection within each SP's holdings. | *Principle 1:*<br>*The responsibilities of a Service Provider (SP) regarding access to any data collection shall be managed by a licence/agreement between the data owner and the SP.*<br><br>*Principle 12:*<br>*Access conditions shall be applied only taking into account: disclosure risk, intellectual property, and reasonable first use period.*<br><br>*Principle 13:*<br>*Service Providers shall advise data owners on the most appropriate access conditions.* |
| **Principle**         **4**<br>All SPs will work towards making their data holdings compliant with the FAIR principles (Findable, Accessible, Interoperable and Reusable). | *Principle 7:*<br>*Each data collection shall have documentation which allows its use.* |
| **Principle**         **5**<br>SPs are required to offer their metadata for | *Principle 9:* |

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| harvesting to the CESSDA services. For interoperability of the metadata, SPs must use controlled vocabularies recommended by CESSDA. | *Resource-discovery metadata in a structured format shall be openly available for any third-party to harvest.* |
| **Principle**          **6**<br>Catalogue metadata for each data collection in SPs' holdings must include a persistent identifier (PID) in accordance with the CESSDA PID Policy and the FAIR principles. SPs must also make clear to the end user how each data collection should be formally referred to upon reuse. | *Principle 10:*<br>*Resource-discovery metadata shall, by 2020, include a persistent identifier.* |
| **Principle**          **7**<br>Access conditions must be clearly displayed in the catalogue metadata record for each data collection in each SP's holdings, stating whether the data collection is open to all or if access is restricted in some way. | *Principle 6:*<br>*Each data collection shall have its access conditions clearly displayed.*<br><br>*Principle 11:*<br>*Access conditions to data shall, by 2022, be fully interoperable.* |
| **Principle**          **8**<br>Metadata harvested by CESSDA will be made available for harvesting to third parties. As noted in Principle 1, metadata should remain available even after data are withdrawn. | *Principle 9:*<br>*Resource-discovery metadata in a structured format shall be openly available for any third-party to harvest.* |
| No match. This statement has been withdrawn as a principle, since it concerns the policy rather than data or metadata arrangements. The update schedule is noted in section 1 above. | *Principle 14:*<br>*This policy shall be reviewed by the Director, every five years or more frequently if required.* |