Ruisrock, leijan lennätystä by Innanen, Heikki - Finnish Heritage Agency, Finland - CC BY

europeana

Data Governance for the common European data space for cultural heritage Strategy and Plan, Jan 2023

Table of Contents

Introduction

This strategy describes the actions to iteratively and progressively develop an approach for the governance of data in the common European data space for cultural heritage.

This document facilitates transitioning from the current frameworks and standards, starting from the Europeana Licensing Framework, towards supporting operations in the data space for cultural heritage, while providing transparency to facilitate engagement with all relevant stakeholders.

This document has been prepared by Ariadna Matas (Europeana Foundation), with contributions from Antoine Isaac (Europeana Foundation), Esther Huyer (Capgemini Invent), Fred Saunderson (National Library of Scotland), Julia Fallon (Europeana Foundation), Kerstin Arnold (Archives Portal Europe), Marie-Véronique Leroi (Ministry of Culture, France), Paul Keller (Open Future) and Valentine Charles (Europeana Foundation).

This document was first published in January 2023. The last edits were made in January 2023.

Background

Data governance can be broadly understood as the rules that govern the creation, preservation, collection, access to and use of data on the basis of various organisational tools, principles, processes and standards. For many years, the **Europeana Initiative has been governing data** through tools such as the Europeana Licensing Framework (ELF), the Europeana Publishing Framework (EPF), the Europeana Data Model (EDM), alongside various policies, processes and infrastructure.

As the Europeana Initiative builds and deploys the data space for cultural heritage, the **rules that determine how data is governed need to evolve** too in order to, among other things, support the sharing and facilitate the reuse of additional types of data, through new means and for new purposes. Indeed, the tender[1] for the deployment of a common European data space for cultural heritage describes the idea of a data governance mechanism that could build upon existing frameworks and models and comprise 'a set of rules of legislative, administrative and contractual nature that determine the conditions to access, process, use and share data in a trustful and transparent manner'.

---

[1] As described in Chapter 1.4.2.1

This strategy is designed to guide and manage the transition from the current set-up, based on individually developed frameworks and standards, towards a coordinated and cohesive approach to data governance that builds upon them.

While the current tools can continue to support data sharing and reuse as they did prior to the development of the data space for cultural heritage, they need to evolve in scope and substance, in response to clear user needs, towards a mechanism for the governance of data in the data space for cultural heritage.

> **For example,** *the Data Space infrastructure currently supports the creation and use of semantic tags, transcriptions and subtitles that enrich data and as a result create a more valuable experience for users of digital cultural heritage. As these enrichment tools continue to be developed and deployed, the existing rules need to be developed to facilitate enriched data to contribute towards higher quality and greater reuse.*

This generally also represents an opportunity for an overarching review of their various elements to ensure that they respond to contemporary needs, challenges and organisational objectives, that they are flexible and easily adaptable, and that they function effectively in practice by designing new implementation measures.

> **For example**, *some cultural heritage institutions sharing data with the Europeana Initiative have expressed concerns with the list of rights statements available to express rights and reuse conditions of digital objects. Some have brought to our attention the incompatibility of national standards and obligations for opening up cultural heritage metadata with the Creative Commons Public Domain Dedication. After further research and evaluation, these concerns should be addressed and changes should be reflected in the rules that govern data.*

This strategy strongly relies on the Europeana Licensing Framework as its starting point. It is designed to address changes needed to its various elements and implementation measures, in view, among other things, to update and develop the rules described in the Data Exchange Agreement and relevant terms. Given the strong connections between the Europeana Licensing Framework, the Europeana Publishing Framework and Europeana Data Model, there are various actions that will require changes or implementation measures that are within the scope of these tools.

About this strategy

The body of this strategy is organised around categorised actions. The actions have been identified on the basis of general review needs, use cases, changes to law and policy, or needs expressed by various stakeholders. They are categorised according to four stages of a policy management cycle:

- Stakeholder engagement: actions contribute to the process for identifying, engaging and managing engagement with stakeholders in the development and implementation of data governance mechanisms.
- Research: actions ensure that scenarios and use cases for development and implementation measures are identified and articulated, with clarity on the problem to be solved, so that solutions can be designed relying on objective data, evidence and stakeholders' input.
- Design and Development: actions translate results from previous stakeholder engagement and/or research into tangible policy-based tools and resources.
- Implementation, maintenance and measurement: actions support the practical deployment, implementation and maintenance of the solutions designed. These are also followed by assessing the impact of the solution undertaken, using data gathered during the implementation phases.

The policy management cycle is intended to guide the development and management of policy-based solutions to specific use cases. Solutions can range from narrow, such as new policy documents, to broader actions, such as refining frameworks. The general or specific nature of the action is identified below every action title. Stakeholder engagement and iterative development are essential features threaded throughout the cycle. This cycle is sequential: an action moves from one stage to the next, such as from research once complete, to design and development, and then on to implementation (with the exception of stakeholder engagement).

While this strategy describes the process, as new policies, rules and implementation measures are developed, approaches for the governance of data will progressively take shape, possibly leading to changes to the Europeana Licensing Framework as well as, in the long run, to other related frameworks, standards and tools. To ensure interoperability within and with the other data spaces, the data governance mechanism will have to be implemented by the bodies in charge of the governance of the data space.

The actions initially identified within this strategy take place from September 2022 to August 2024. However, timeframes are indicative and will be regularly reviewed and adapted to progress, dependencies and capacity. The identification of additional use cases and opportunities will also lead to changes to the strategy.

In order to successfully conduct the actions described in this strategy, it is important that the following principles are respected:

- **Transparency**, in order to facilitate collaboration and participation from stakeholders and experts. This will be achieved through the publication of this

strategy, and periodic and timely updates published through Europeana Pro and other relevant channels.

- **Iterations**, in order to be able to support and respond to changes that will progressively happen in the data space. To support this, this strategy is built to be flexible, describes initial steps, and will be developed and enriched with time.
- **Collaboration**, to facilitate participation from stakeholders and experts. In particular, policy and technology should work hand in hand to co-design the rules that govern the data.

The Europeana Foundation will manage the process and conduct most of the efforts needed to deliver the work described in the strategy. A group of individuals representing the various stakeholders in this discussion will have oversight and give direction on all aspects of this strategy. Partners within the Europeana Data Space Consortium will be engaged in actions as appropriate. In addition, each of the steps within this strategy points to relevant stakeholders and experts that should be invited to participate and collaborate in shaping the data governance rules.

Actions for the development and implementation of data governance

This section describes the various actions that support the transition from existing frameworks and models, in particular the Europeana Licensing Framework, towards an approach for the governance of data in the data space for cultural heritage.

1. Stakeholder engagement

The following action contributes to the process for identifying, engaging and managing engagement with stakeholders in the development and implementation of data governance mechanisms.

Action 1.1. Coordinate a Data Governance Stakeholder Working Group

Time frame: January 23 to August 24 General framework/mechanism related action

While the various steps described in this document will be coordinated by the Europeana Foundation, experts and stakeholders are the ones who should shape the rules, so that approaches to data governance respond to their needs. The Foundation can contribute by facilitating dialogue and consultation, reconciling diversity of opinions and supporting their practical implementation and maintenance. A group representing stakeholders, such as providers and users of data, or other data spaces, will have oversight on the various steps, decision-making, and will be able to inform and involve their respective networks.

Outputs		- Stakeholder working group brief - Regular stakeholder meetings
Dependencies		/
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission, Member States [CEDCHE]
	Experts consulted	/

Action 1.2. Identify user needs through stakeholder consultation

General framework/mechanism related action

The practical implementation of the Europeana Licensing Framework has raised various challenges, resulting, for example, in the lack of accuracy of many rights statements, but opportunities have also been identified by stakeholders. These needs should be evaluated more in depth, on a regular basis, and result in priorities within this strategy.

Outputs		Brief analysing consultation results
Dependencies		/
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission, Member States [CEDCHE]
	Experts consulted	Capgemini Invent

2. Research

The following actions ensure that scenarios and use cases for development and implementation measures are identified and articulated, with clarity on the problem to be solved, so that solutions can be designed relying on objective data, evidence and stakeholders' input.

Specific areas already identified and addressed in the [Design and development](#) or [Implementation, maintenance and measurement](#) sections stem from discussions with stakeholders to date, and will continue to be evaluated, refined and expanded upon as the needs of the data space evolve.

Action 2.1. Analyse the conditions that govern metadata provided

Specific policy/tool related action

National standards for expressing reuse conditions of cultural heritage metadata have been developing across European Union Member States. Most establish an obligation to attribute the cultural heritage institution that generates or makes the data available that is based on copyright and sui generis rights. These might be incompatible with the approach followed by Europeana Foundation through using the Creative Commons Public Domain Dedication for metadata, which can result in valuable metadata not

being shared via the Europeana Core Service Platform and/or the common European data space for cultural heritage.

After conducting research to understand policy, legislation and practice, a creative effort should be made to design a solution to address this problem. This shouldn't necessarily rely on copyright, and it should strive for simplicity in reuse conditions, interoperability, and make use of technological possibilities to encourage attribution, work for all stakeholders and facilitate compatibility across national standards, while being mindful of the impact that changes can have on reuse.

Outputs		Brief describing possible scenarios, respective concerns and impact, for rules on metadata
Dependencies		/
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission, Member States [CEDCHE]
	Experts consulted	Capgemini Invent, Rights Statements Consortium, Creative Commons

Action 2.2. Evaluate copyright in 3D models

Time frame: September 23 to January 24 Specific policy/tool related action

Through the [2021 Recommendations on a common European data space for cultural heritage](), the European Commission encourages Member States to step up their efforts for the 3D digitisation of cultural heritage artefacts, monuments, sites, and intangible heritage, and facilitating their reuse as much as possible. To contribute to this, research should be conducted on how existing tools and policy manages and addresses property rights and copyright questions in the digitisation of this cultural heritage. It is also essential to understand the extent to which rights exist and can or cannot be claimed to the 3D model itself, and on paradata, and assess the need for changes to adequately express reuse possibilities and conditions.

Outputs		Brief analysing copyright considerations in 3D models
Dependencies		/
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network

		Association], data partners [Europeana Aggregators' Forum], European Commission, Member States [CEDCHE]
	Experts consulted	Europeana 3D Taskforce, Capgemini Invent

Action 2.3. Understand considerations for the display and use of personal data in digital cultural heritage

Time frame: March 23 to August 24 Specific policy/tool related action

Digital cultural heritage often contains personal data, either through information in the metadata, or through the digital objects. Cultural heritage institutions across the European Union make assessments to decide whether they have a legal basis to share this data via the data space, or bear a risk to do so. A better understanding of data protection and privacy obligations is necessary, just like with copyright conditions, and eventually processes and practices can be adapted to support the assessments made by cultural heritage institutions, for example via a more detailed take down process.

Outputs		Brief analysing privacy considerations in digital cultural heritage
Dependencies		/
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission, Member States [CEDCHE]
	Experts consulted	Capgemini Invent

Action 2.4. Evaluate available rights statements and metadata fields

Time frame: June to November 23 Specific policy/tool related action

Currently, some cultural heritage institutions sharing data with the Europeana Core Service Platform use rights statements developed by the Rights Statements Consortium but not supported by the Europeana Core Service Platform. It is necessary to regularly evaluate the list of rights statements that those who provide data to the data space for cultural heritage can rely on, to ensure that it responds to their needs. In addition, various data providers have expressed an interest in reconsidering the structure of rights information under the Europeana Data Model.

This can entail considering whether additional statements need to be designed and developed, and evaluating whether the Europeana Data Model needs updates to accommodate opportunities to facilitate communicating relevant information following legal, policy changes and institutional practices.

Outputs		Brief describing needs by cultural heritage institutions sharing data through the data space, and options
Dependencies		- Action 1.2. Identify user needs through stakeholder consultation - Action 4.4. Coordinate the Rights Statements Consortium
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission, Member States [CEDCHE]
	Experts consulted	Rights Statements Consortium, Creative Commons, Capgemini Invent

Action 2.5. Identify areas for further research

Time frame: January 23 to August 24 General framework/mechanism related action

It is important to constantly identify and define areas where there is a specific need to design and develop policy and implementation measures. As part of this strategy, and alongside user research, we will work to articulate areas that require further research, to build a strong basis from which data governance 'design' and 'implementation' work can be delivered.

Outputs		Short reports outlining use cases
Dependencies		[not dependant on other priorities, but impacts most priorities below]
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission, Member States [CEDCHE]
	Experts consulted	Academic researchers in each of the candidate areas

3. Design and development

The following section outlines actions that translate results from previous stakeholder engagement and/or research into tangible policy-based tools and resources.

Action 3.1. Define common language for 'Data Governance' for the data space for cultural heritage

Expected time frame: January to July 23 General framework/mechanism related action

Data governance can mean different things to different people and organisations. For the purpose of collaboratively shaping approaches to the governance of data for the data space for cultural heritage, it is important to create a common understanding of what falls within the scope of data governance in the context of the data space for cultural heritage. This should include collaboratively deciding what type of mechanism is needed and its structure.

Outputs		- Brief describing the scope of 'data governance' - Update of the Europeana Glossary
Dependencies		Action 1.1. Coordinate a Data Governance Stakeholder Working Group
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission
	Experts consulted	Capgemini Invent

Action 3.2. Outline guiding principles for the governance of data

Time frame: February to August 23 General framework/mechanism related action

In order to develop the rules for the governance of data in a way that is consistent, coherent and sustainable, and so that policy and technology can work hand in hand, it is important to outline guiding principles that can be applied across all of the policies and rules developed as part of the steps described in this strategy. This will help bring stakeholder and expert positions together, and will provide direction in the future.

Outputs	Policy outlining principles and values for the governance of data

Dependencies		Action 1.1. Coordinate a Data Governance Stakeholder Working Group
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission, Member States [CEDCHE]
	Experts consulted	Capgemini Invent

Action 3.3. Define the rules that govern enrichments

Time frame: September 22 to August 23 Specific policy/tool related action

Enrichments, including metadata enhancements, transcriptions, subtitles and translations, both machine and human-generated, are key to increasing the quality and value of cultural heritage data. Their production, dissemination and use will continue to be strengthened in the data space for cultural heritage. They do not all currently fall within the scope of frameworks and standards used by the Europeana Core Service Platform, which means, for example, permissions and reuse conditions have not been addressed in a standardised and sustainable way for certain types of data. Addressing this problem requires a consistent and efficient approach that is mindful of priorities and principles in ingestion, provenance, display and data quality.

Outputs		Enrichments policy
Dependencies		Action 1.2. Identify user needs through stakeholder consultation
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission, Member States [CEDCHE]
	Experts consulted	Capgemini Invent

Action 3.4. Develop an approach to identify inaccurate rights statements

Time frame: June 23 to September 23 Specific policy/tool related action

In 2018 and 2019, two accuracy reports provided information on the overall percentages of accurate and inaccurate rights information in the Europeana website.

These reports describe the state of accuracy in the Europeana website, identify the percentage of accurate and inaccurate material and the main types of inaccuracies, and make recommendations to address them (e.g. identifying one particular set of records whose change of rights statement would significantly change the percentage of accurate rights information). As inaccuracies seem to persist, and we define measures to correct them, we need to be able to measure progress and improvement of the accuracy of rights statements, in a way that is sustainable and can be compared over time.

Outputs		Methodology for evaluating the accuracy of rights information
Dependencies		/
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum]
	Experts consulted	Rights Statements Consortium, Creative Commons

Action 3.5. Develop the cooperation agreement and standardised terms

Time frame: November 23 to May 24 Specific policy/tool related action

The findings from research, policies and rules defined and agreed on as part of the efforts undertaken in previous priorities should be turned into a set of contractual conditions that the relevant parties, including those who provide the data and those who use it, should comply with. This should take the shape of a cooperation agreement that builds upon the Europeana Data Exchange Agreement, and of various sets of standardised terms, including website terms and conditions, that develop existing terms.

Outputs	Cooperation agreement and standardised terms drafted
Dependencies	- Action 1.1. Coordinate a Data Governance Stakeholder Working Group - Action 2.1. Analyse the conditions that govern metadata provided - Action 3.1. Define common language for 'Data Governance' for the data space for cultural heritage - Action 3.2. Outline guiding principles for the governance of data

Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission, Member States [CEDCHE]
	Experts consulted	Capgemini Invent

4. Implementation, maintenance and measurement

This section describes actions that support the practical deployment, implementation, and maintenance of the solutions designed. These are also followed by assessing the impact of the solution undertaken, using data gathered during the implementation phases.

Action 4.1. Train data providers in relation to data governance

Time frame: June 23 to August 24 General framework/mechanism related action

The success in practice of the various actions identified above is dependent on putting in place relevant measures, in particular building the capacity of those who can or should rely on the rules defined for the governance of data. This can be done for specific areas, such as data protection, copyright in 3D models, or metadata conditions, and through various approaches, such as guidance and training.

Outputs		● Training resources ● Events
Dependencies		Action 2.1. Identify user needs through stakeholder consultation
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum]
	Experts consulted	Europeana Capacity Building Working Group, Capgemini Invent

Action 4.2. Train users of digital cultural heritage in relation to data governance

Time frame: June 23 to August 24 General framework/mechanism related action

The Europeana Initiative's frameworks and standards have been designed to make reuse conditions transparent. In order to ensure that they can effectively foster and encourage the reuse of digital cultural heritage, it is essential that users of such data understand the reuse conditions. Their capacity can be built by creating recommendations, case studies, guidelines and training resources that explain the legal and practical possibilities for reusing such data. This can be designed with specific types of uses in mind.

Outputs		- Training resources - Events
Dependencies		Action 2.1. Identify user needs through stakeholder consultation
Contributing	Stakeholders consulted	Europeana Foundation staff, cultural heritage professionals and digital cultural heritage users [Europeana Network Association], data partners [Europeana Aggregators' Forum], European Commission
	Experts consulted	Europeana Capacity Building Working Group, Capgemini Invent

Action 4.3. Implement the cooperation agreement and standardised terms

Time frame: June 24 onwards Specific policy/tool related action

A process should be in place to coordinate and support the signature of the cooperation agreement by the relevant parties. This needs to go hand in hand with the training efforts described above and tailored to this particular action.

Outputs	Cooperation agreement and terms and conditions are in force
Dependencies	- Action 2.1. Analyse the conditions that govern metadata provided - Action 2.3. Understand considerations for the display and use of personal data in digital cultural heritage - Action 3.1. Define common language for 'Data Governance' for the data space for cultural heritage - Action 3.2. Outline guiding principles for the governance of data - Action 3.5. Develop the cooperation agreement and standardised terms

		• Action 4.1. Training data providers in relation to data governance
Contributing	Stakeholders consulted	Europeana Aggregators' Forum [aggregators], CEDCHE [EU Member States], users of digital cultural heritage, European Commission, Europeana Foundation staff, Europeana Network Association [cultural heritage professional]
	Experts consulted	Data Spaces Support Centre

Action 4.4. Coordinate the Rights Statements Consortium

Time frame: September 22 to August 24 Specific policy/tool related action

Rights Statements play a crucial role in making it possible to communicate the reuse conditions that it gives access to. It is in the Europeana Initiative's best interest that the Rights Statements Consortium's work continues to be strengthened and developed.

Outputs		/ [ongoing]
Dependencies		Action 1.2. Identify user needs through stakeholder consultation
Contributing	Stakeholders consulted	Europeana Aggregators' Forum [aggregators], users of digital cultural heritage, European Commission, Europeana Foundation staff, Europeana Network Association [cultural heritage professional]
	Experts consulted	/

Action 4.5. Implement article 14 of the CDSM Directive

Time frame: September 23 to January 24 Specific policy/tool related action

The Copyright in the Digital Single Market Directive (CDSM Directive) created new opportunities for the reuse of public domain material. This presents an opportunity to increase the amount of public domain material available through the data space for cultural heritage. This can be done by developing a campaign to encourage the update of rights statements of public domain material made available via the data space for cultural heritage, in line with the Directive.

Outputs	Public domain campaign. Reingestion of public domain material with an accurate rights statement.

Dependencies		/
Contributing	Stakeholders consulted	Europeana Aggregators' Forum [aggregators], users of digital cultural heritage, European Commission, Europeana Foundation staff, Europeana Network Association [cultural heritage professional]
	Experts consulted	/

Action 4.6. Regularly correct inaccurate rights statements

Time frame: September 23 to August 24 Specific policy/tool related action

When inaccuracies are identified, steps are followed to encourage data partners to re-ingest the data with correct rights information. A clear process is described to provide transparency on the approach followed.

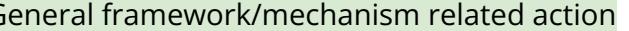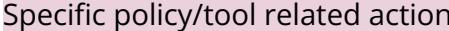| Outputs		Changes to rights statements
Dependencies		- Action 3.4. Develop an approach to identify inaccurate rights statements - Action 4.3. Implement the cooperation agreement and standardised terms - Action 4.5. Implement article 14 of the CDSM Directive
Contributing	Stakeholders consulted	Europeana Aggregators' Forum [aggregators], users of digital cultural heritage, European Commission, Europeana Foundation staff, Europeana Network Association [cultural heritage professional]
	Experts consulted	/

Annex. Timeline

Colour coding: General framework/mechanism related action Specific policy/tool related action

	Dec 22	Jan23	Feb23	Mar23	Apr 23	May23	Jun 23	Jul23	Aug23	Sept23	Aug23	Sept23	Oct23	Nov23	Dec23	Jan24	Feb24	Mar24	Apr24	May24	Jun24	Jul24	Aug24
Stakeholder engagement																							
1.1. Coordinate a Data Governance Stakeholder Working Group		G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G		G	G	G
1.2. Identify user needs through stakeholder consultation		G	G	G	G												G	G	G				
Research																							
2.1. Analyse the conditions that govern metadata provided				P	P	P	P	P	P														
2.2. Evaluate copyright in 3D models											P	P	P	P	P	P	P						
2.3. Understand considerations for the display and use of personal data in digital cultural heritage				P	P	P	P	P	P														
2.4. Evaluate available rights statements and metadata fields								P	P	P	P	P	P	P									
2.5. Identify areas for further research		G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G	G
Design and Development																							
3.1. Define common language for 'Data Governance' for the Data Space for Cultural Heritage		G	G	G	G	G	G	G	G														
3.2. Outline guiding principles for the governance of data			G	G	G	G	G	G	G	G	G												

	Dec 22	Jan23	Feb23	Mar23	Apr 23	May23	Jun 23	Jul23	Aug23	Sept23	Aug23	Sept23	Oct23	Nov23	Dec23	Jan24	Feb24	Mar24	Apr24	May24	Jun24	Jul24	Aug24
3.3. Define the rules that govern enrichments	▨	▨	▨	▨	▨	▨	▨	▨															
3.4. Develop approach to identify the rate of inaccurate rights statements							▨	▨	▨	▨	▨	▨	▨										
3.5. Develop the cooperation agreement and standardised terms														▨	▨	▨	▨	▨	▨	▨			
Implementation, maintenance and measurement																							
Action 4.1. Training data providers in relation to data governance							▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩
Action 4.2. Train users the reuse of digital cultural heritage in relation to data governance							▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩	▩			
4.3. Implement the cooperation agreement and standardised terms																				▨	▨	▨	▨
4.4. Coordinate the Rights Statements Consortium	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨			
4.5. Implement article 14 of the CDSM Directive													▨	▨	▨	▨		▨	▨				
4.6. Regularly correct inaccurate rights statements													▨	▨	▨	▨	▨	▨	▨	▨	▨	▨	▨

europeana

pro.europeana.eu

@EuropeanaEU