

APPENDIX I

ASSESSMENT FOR DATA SPACE GOVERNANCE

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Assessment for Data Space Governance

This assessment has been developed as a practical tool to support the design of governance arrangements for data spaces. It is structured around four interconnected pillars:

- ▶ **Purpose** defines the mission, scope, and beneficiaries of the data space, setting its long-term direction.
- ▶ **Principles** articulate the normative commitments and values (including transparency, accountability, and DSD) that should guide governance.
- ▶ **Processes** establish the institutional structures, decision-making mechanisms, and oversight functions needed to enact governance.
- ▶ **Practices & Policies** operationalize governance through concrete rules, standards, and tools across the data lifecycle.

Together, these pillars guide stakeholders through the key questions of governance: why the data space exists, what values underpin it, how decisions are made, and what operational rules are required to make it work in practice.

The questions are not intended to prescribe a single model. Instead, they are designed to support structured discussions and self-evaluation to help align diverse stakeholders to consider what they have done to incorporate digital self-determination into data space governance. Used in workshops, consultations, or internal planning, they can help ensure that governance frameworks are transparent, inclusive, and durable—and that they uphold digital self-determination as a core commitment.

ASSESSMENT

This assessment includes **72 questions**—14 for purpose, 18 for principles, 18 for processes, and 22 for practices and policies. The minimum point total is 72 and the maximum point total is 216.

To calculate their score, data space operators should go through the assessment, responding to the questions, writing down their score for each section. At the end, they should go back and add their total score together. A rubric below offers general guidance on how to interpret the total score, but data space operators may also find it useful to look at the category with the lowest score as an indicator of the kinds of governance issues they may want to specifically address.

RUBRIC

Point Total	Description
172–216 points (>80%)	The data space has strongly embedded digital self-determination across all four categories. There are multiple avenues by which community members and other stakeholders can make their interests known and see it acted upon. Barring other circumstances, the data space is likely to align with local needs and build trust across the community.
107–215 points (>50%)	The data space has taken some efforts to embed digital self-determination into governance—but there may be some gaps or limits to this work. Operators may have only focused on one or two aspects of governance or put limits on the degree to which public input informs activities. The data space may foster some amount of trust but more work needs to be done to ensure alignment with local interests and expectations.
70–106 points (<49.9%)	The data space may want to more seriously integrate digital self-determination into governance. Efforts to embed local needs may be lacking across all four categories. There may be a lack of knowledge of how the data space supports the community's interests or considers their perspective. The data space may have difficulty securing and sustaining high levels of trust.

1. PURPOSE

Objectives of the Data Space

The purpose section should help stakeholders clearly define **why the data space exists** and what collective objectives it aims to serve. This establishes legitimacy, alignment, and shared expectations.

GUIDING QUESTIONS

MISSION & PUBLIC VALUE

What overarching societal or sectoral challenges does this data space address?

- ☐ **3 Points:** There is a clear overarching societal or sectoral challenge that the data space addresses.
- ☐ **2 Points:** The data space only indirectly addresses some societal or sectoral challenge or there is a lack of consensus.
- ☐ **1 Point:** The data space has little to no relevance to a societal or sectoral challenge.

Does the intended goal of the data space align with some community priority or provide some other material support to community members?

- ☐ **3 Points:** The intended goal of the data space clearly aligns with the community's priorities or, if not, provides some tangible support to community members.
- ☐ **2 Points:** The intended goal of the data space aligns with the priorities of only some members in the community or offers some other support that is not universally valued.
- ☐ **1 Point:** The intended goal of the data space is unrelated to or directly at odds with the priorities of community members. Any support offered is irrelevant or has no value for the community.

SCOPE & BOUNDARIES

Does the community understand the proposed data lifecycle in its entirety (e.g. from the type of data that will be collected to how it will be used)?

- ☐ **3 Points:** The community understands the proposed data lifecycle in its entirety because information on the data has been delivered in a format and style it can understand.
- ☐ **2 Points:** While information is not broadly accessible, community members with specialized knowledge or a position of authority can understand the data lifecycle in its entirety.
- ☐ **1 Point:** Information on the data lifecycle is either unavailable or incomplete. It is not possible for any member of the community to meaningfully understand the data use.

Are there objections regarding any data types, analytic techniques, or applications?

Are these absolute or can a data application be in any way justified?

- ☐ **3 Points:** If there are objections regarding any data types, analytic techniques, or applications, that element has been excluded from the data space or the community has agreed on a mitigating factor that can justify its inclusion.
- ☐ **2 Points:** If there are objections regarding any data types, analytic techniques, or applications, that element has been noted. The data space operators have tried to justify their decision in a clear and credible way, even if this justification is not broadly accepted.
- ☐ **1 Point:** The data space operator has either not sought to understand community objections or it has not tried to credibly justify its own decision-making to external parties.

What geographies, communities, or domains does the data space cover?

- ☐ **3 Points:** The data space operators have definitively outlined the geographies, communities, and domains that the data space covers.
- ☐ **2 Points:** The data space operators have offered general guidance on the geographies, communities, and domains that the data space covers but there remain some ambiguities in overall focus or direction.
- ☐ **1 Point:** Little to no attempt has been made to define the boundaries of the data space. The scope is vague, with a high potential for mission creep.

BENEFICIARIES & STAKEHOLDERS

Who are the intended direct beneficiaries and who may be indirectly impacted by data space activities?

- ☐ **3 Points:** The data space has identified intended direct beneficiaries and who also may be indirectly impacted by data space activities. It has ensured that the data space does not widen any disparities or exacerbate inexistent inequities.
- ☐ **2 Points:** The data space has identified intended direct beneficiaries but has not examined larger consequences or any indirect impacts. There has been limited work done to understand how benefits may impact the relationships between beneficiaries.
- ☐ **1 Point:** The data space has not identified any beneficiaries beyond the involved stakeholders. It cannot clearly identify the consequences of its activities nor whether the data space will exacerbate inequities.

Do these stakeholders see sufficient value in their involvement and, if not, what do they still need?

- ☐ **3 Points:** All stakeholders see sufficient value or a need met by their involvement in the data space, one that will sustain their involvement long-term.
- ☐ **2 Points:** Most stakeholders can connect their interests to the data space's success or there is sufficient political will (or other incentive) to motivate involvement in the short term.
- ☐ **1 Point:** The data space relies on the good will of stakeholders and there is little guarantee of sustained support in the long term.

How do stakeholders understand their relationship with one another? Do they see the data space as impacting them equitably?

- ☐ **3 Points:** Stakeholders understand who else is participating in the data space and their relationships to one another. They have no concerns about these other parties and see no equity, ethics, or conflict of interest concerns.
- ☐ **2 Points:** Stakeholders understand who else is participating in the data space even if the exact role or relationship is nebulous. There may be some concerns about certain participants that have not been fully addressed.
- ☐ **1 Point:** Stakeholders do not have full visibility on other data space participants or have serious objections to the involvement of certain parties that have not been addressed.

ALIGNMENT WITH BROADER GOALS

What goals are other institutions pursuing and to what extent does the data space align with these goals?

- ☐ **3 Points:** The goals of other institutions in the domain space or sector align with the goals of the data space.
- ☐ **2 Points:** The goals of the data space do not align with the interests of other institutions but they are not operating in competition or tension.
- ☐ **1 Point:** The goal of the data space is in tension with the goal of other institutions in the domain or sector.

Do the community and other stakeholders consider these other goals a priority?

- ☐ **3 Points:** The goal that the data space seeks to accomplish is highly salient within the community or among relevant stakeholders. It is considered a priority issue to be addressed.
- ☐ **2 Points:** The data space achieves a goal that some community members and stakeholders value, even if they have other interests that take higher precedence.
- ☐ **1 Point:** The data space addresses an issue or challenge that most stakeholders and community members see as unimportant or in direct opposition to higher priority interests.

Are the relationships between these goals clear and explicable to others?

- ☐ **3 Points:** The data space operators have clearly explained their goals and how these relate to other goals in the community of interest. This explanation is clear, concise, and easily accessible.
- ☐ **2 Points:** The data space operators have explained their goals but the information is not universally understandable because it is not in a format that is clear, concise, or easily accessible.
- ☐ **1 Point:** The data space operators have declined to communicate how their goals relate to others. Efforts to engage with other interests are tokenistic.

MEASURING SUCCESS

What short-, medium-, and long-term outcomes might result from the data space that the community considers important to justify the (re-)use?

- ☐ **3 Points:** The data space operators have clearly identified a set of short-, medium-, and long-term outcomes that align with what the community considers important to justify the (re-)use.
- ☐ **2 Points:** The data space operators have identified some short-, medium-, and long-term outcomes, but the set is incomplete, weakly linked to community priorities, or not sufficiently specific to justify (re-)use.
- ☐ **1 Point:** The data space operators have not articulated meaningful outcomes, or outcomes are disconnected from what the community considers important to justify (re-)use.

How does the community want this information communicated to ensure accountability?

- ☐ **3 Points:** These goals have been communicated in a format that the community prefers and in a language it can readily understand so as to ensure accountability.
- ☐ **2 Points:** The data space operators have communicated goals and outcomes, but the format, timing, or accessibility is uneven, limiting accountability for most community members.
- ☐ **1 Point:** Goals and outcomes are not communicated in an accessible way, leaving the community unable to track progress or hold operators accountable.

How do stakeholders evaluate trade-offs between competing interests? Are there any interests that supersede all others?

- ☐ **3 Points:** The data space operators understand how stakeholders and the community of interest evaluate trade-offs between interests. There is a clear prioritization of what to pursue if there is a conflict between two intended objectives.
- ☐ **2 Points:** The data space operators have some understanding of trade-offs, but prioritization is informal, contested, or not clearly documented when conflicts arise.
- ☐ **1 Point:** Trade-offs are handled ad hoc or implicitly; stakeholders cannot explain how conflicts are resolved or what interests supersede others.

SCORE TOTAL: PURPOSE: _____ of 42 TOTAL

2. PRINCIPLES

Guiding Values for the Data Space

Principles articulate the **normative foundation** of the data space and foster **trust** within a data space arrangement. They define what values and commitments will guide governance choices, partnerships, and data use. They also serve as benchmarks against which practices and processes can be tested and adapted.

GUIDING QUESTIONS

INCLUSIVITY AND REPRESENTATION

How does the community want to preserve its control in data governance?

- ☐ **3 Points:** The community has been meaningfully solicited and there are clear mechanisms to preserve its control in data governance.
- ☐ **2 Points:** Community input has been sought and some concrete arrangements exist to preserve influence, but key elements are incomplete or uneven (e.g., accessibility of channels, enforceability, clarity of representation/mandate, or demonstrable impact on decisions).
- ☐ **1 Point:** Community control is largely absent or informal; representation is unclear; participation relies on ad hoc engagement with limited visibility, limited influence on decisions, and no reliable way to preserve control as uses and risks evolve.

What degree of importance does it assign this work and its involvement in it?

- ☐ **3 Points:** These mechanisms reflect the level of importance that the community itself assigns to the work and its involvement in the data space.
- ☐ **2 Points:** Mechanisms exist, but they only partly reflect the level of importance the community assigns: involvement is under-scoped or inconsistent (e.g., consultation is periodic rather than continuous, representation/mandates are unclear, feedback is collected but not systematically responded to, participation is not resourced, or there is limited evidence that community input changes priorities, rules, or decisions).
- ☐ **1 Point:** Mechanisms do not reflect the level of importance the community assigns: involvement is minimal, symbolic, or ad hoc (e.g., one-off engagement, no defined channels or representation, no records of input or responses, no decision checkpoints requiring community input, no resourcing/ownership), and there is no credible evidence that community priorities shape governance outcomes over time.

Are there any relevant groups at risk of exclusion, underrepresentation, or marginalization? What specialized engagement is needed to reach them and represent their interests?

- ☐ **3 Points:** If there are any groups at risk of exclusion, underrepresentation, or marginalization, these groups have been identified and there are dedicated mechanisms to reaching them and preserving their interests.
- ☐ **2 Points:** Some groups at risk of exclusion, underrepresentation, or marginalization have been identified and there are some targeted steps to reach them, but the approach is incomplete or uneven (e.g., engagement is occasional rather than sustained, outreach relies on generic channels, representation is informal, dedicated capacity/resources are limited, or there is limited evidence that their input is reflected in governance decisions).
- ☐ **1 Point:** Groups at risk of exclusion, underrepresentation, or marginalization have not been identified, or identification is superficial, and there are no dedicated mechanisms to reach them or preserve their interests.

TRANSPARENCY AND COMMUNICATION

What do community members view as important when it comes to day-to-day and strategic operations of the data space (e.g. data provenance, access rights, governance decisions)?

- ☐ **3 Points:** Community priorities are elicited and documented, translated into governance requirements, and embedded into operations and strategic decision-making, with ongoing feedback/contestation and periodic updates as uses/risks evolve.
- ☐ **2 Points:** Some priorities are identified and reflected in practice, but coverage is partial (day-to-day vs strategic), enforcement/visibility is uneven, or feedback does not reliably change decisions.
- ☐ **1 Point:** Priorities are not identified or remain informal; operations and decisions are set by institutions/ad hoc processes with little visibility, influence, or adaptation for the community.

What mechanisms can the data space use to provide visibility onto these elements?

- ☐ **3 Points:** The data space provides sustained, practical visibility into these elements through documented, accessible mechanisms (e.g., clear records of data provenance and flows, transparent access conditions and changes, published governance decisions with rationales, and logs/registries that allow affected parties to understand what happened and why), and these visibility tools support feedback and contestation over time.

- ☐ **2 Points:** Some visibility mechanisms exist, but they are incomplete or uneven (e.g., limited to certain data/products or actors, hard to access or interpret, not regularly updated, missing rationales, or not linked to feedback/contestation), so community understanding and influence is only partial.
- ☐ **1 Point:** Visibility is largely absent or informal; key elements are opaque, scattered, or only available on request, with no reliable records, no systematic publication of decisions/rationales, and no practical way for affected parties to track or challenge what occurs.

How can important decisions be explained in an intelligible manner, given the community's limited time, resource, and knowledge of data activities?

- ☐ **3 Points:** Every important decision gets a short, plain-language note: what/why/who/impact + where to see the supporting record, with a clear channel to ask/contest.
- ☐ **2 Points:** Explanations exist but are inconsistent (missing why/impact/who, too technical, or hard to find), so most community members can't reliably understand or respond.
- ☐ **1 Point:** Explanations are absent or ad hoc; decisions are effectively opaque, leaving the community without practical understanding or influence.

ACCOUNTABILITY AND AUTONOMY

Who is ultimately responsible for what decisions? How is this tracked and communicated?

- ☐ **3 Points:** Decision rights and accountability are explicitly assigned (roles/mandates), and decisions are traceable and reviewable via documented governance processes plus records (e.g., decision logs/traceability, published rules, and clear communication of "who decided what and why").
- ☐ **2 Points:** Responsibilities exist on paper, but tracking/communication is partial (e.g., unclear decision rights, incomplete records, limited traceability, or inconsistent communication to participants/communities).
- ☐ **1 Point:** Responsibility is unclear or fragmented; decisions are not consistently tracked or communicated, leaving accountability and oversight weak in practice.

What do community members see as appropriate measures to ensure compliance with legal, ethical, and internal governance standards?

- ☐ **3 Points:** Community expectations are gathered and turned into clear rules and checks (training, monitoring/audits, reporting, and consequences) that are actually used.
- ☐ **2 Points:** Some rules and checks exist, but they don't fully match community expectations or are applied unevenly (limited monitoring, weak reporting, unclear consequences).

- ☐ **1 Point:** Compliance relies on vague principles or ad hoc effort; there are no clear checks, reporting, or consequences aligned with community expectations.

What grievance or redress mechanisms do they expect if a rule is violated?

- ☐ **3 Points:** There is a clear, simple way to report violations; complaints are reviewed by a defined body; timelines and outcomes are communicated; fixes and remedies are possible.
- ☐ **2 Points:** A reporting path exists, but it's hard to use, slow, unclear, or rarely leads to meaningful outcomes.
- ☐ **1 Point:** No reliable grievance path; handling is informal and opaque, with no clear remedy.

EFFECTIVENESS AND AGILITY

What kind of results can be reasonably expected from the data space and at what speed?

- ☐ **3 Points:** Expected results are clearly defined (what, for whom, and how success is measured) with realistic timelines; progress is reviewed regularly and adjusted when conditions change.
- ☐ **2 Points:** Results or timelines are stated but vague or optimistic; tracking exists but is irregular, so expectations are only partly reliable.
- ☐ **1 Point:** Results and speed are unclear or unrealistic; there is no consistent way to track progress or recalibrate expectations.

Are there certain obligations—legal, ethical, professional—that may impede these results? Does the community understand these?

- ☐ **3 Points:** Key obligations are identified and explained in plain language; trade-offs are transparent; the community understands how obligations limit speed/scope and how decisions balance them.
- ☐ **2 Points:** Some obligations are identified, but explanations are partial or too technical; trade-offs are not consistently communicated, so understanding is uneven.
- ☐ **1 Point:** Obligations are not clearly identified or explained; constraints appear unexpectedly, creating confusion and mistrust.

What would be the cost of trying to accelerate or expand work?

- ☐ **3 Points:** Costs are assessed and communicated before scaling (money, staff time, technical effort, governance overhead, and risk); the community can see what is gained and what is sacrificed.
- ☐ **2 Points:** Some cost discussion exists, but it is incomplete (focuses on budget only, or ignores governance/risk impacts), so decisions to accelerate/expand are only partly informed.

- ☐ **1 Point:** Acceleration/expansion happens without a clear cost or risk assessment; hidden burdens fall on participants or affected groups.

DURABILITY

What kinds of risks exist that might compromise the data space's continued operation (e.g. financial support, leadership succession, conflict of interests, erosion of trust)?

- ☐ **3 Points:** The main risks are clearly identified and documented, including funding stability, leadership continuity, conflicts of interest, and trust risks, and there is a practical plan for how each would be handled if it happens.
- ☐ **2 Points:** Some risks are identified, but the list is incomplete or too general, or it is not clear how the data space would respond if the risk occurs.
- ☐ **1 Point:** Risks are not clearly identified; when problems arise they are handled case by case, which makes continued operation and trust fragile.

What contingencies would the community accept to safeguard against these risks?

- ☐ **3 Points:** The community has discussed and agreed in advance what “fallback” measures are acceptable for the main risks (e.g., loss of funding, leadership change, conflicts of interest, loss of trust), and these measures are written down so people know what will happen and how core commitments will be protected.
- ☐ **2 Points:** Some fallback measures have been discussed, but agreement is partial (only some risks covered, not clearly written down, or not clear whether the wider community accepts them), so it's uncertain what will happen if a risk materializes.
- ☐ **1 Point:** No agreed fallback measures exist; safeguards are decided ad hoc when a problem occurs, with little community input and weak protection for core commitments.

How often should the data space and its governance be reviewed? By whom?

- ☐ **3 Points:** Review cycles are defined (regular schedule + trigger-based reviews), with clear responsibility, community participation, and public reporting of findings and changes.
- ☐ **2 Points:** Reviews happen, but timing is irregular, responsibility is unclear, or community involvement/reporting is limited.
- ☐ **1 Point:** No regular reviews; governance is “set and forget,” with little accountability or adaptation over time.

BALANCING TRADE-OFFS

Which benefits and principles does the community prioritize above all others?

- ☐ **3 Points:** The data space operator has developed a comprehensive list of the community's interests and worked with them to rank those interests from most important to least important. The community and data space are in agreement that the data space operator will pursue these interests in the order identified when possible.
- ☐ **2 Points:** The data space operator has, with input from the community, developed a list of several of the communities most important interests and identified the most important of these. The data space has communicated that it will pursue these interests but there may be some other interest or priority that it will also consider.
- ☐ **1 Point:** The data space operator has not secured a clear understanding of the community's interests nor communicated with them about how to prioritize them. The data space operator is primarily pursuing its own interests or what it assumes the community's interests to be.

If two principles or benefits are in conflict, does one supersede the other?

- ☐ **3 Points:** The data space operator has a plan indicating which interests it will pursue and how it will communicate clearly to the public when conflicts arise.
- ☐ **2 Points:** The data space operator has a plan indicating which interests it will pursue but does not have a clear mechanism by which it can communicate these conflicts when they occur.
- ☐ **1 Point:** The data space operator has no plan for addressing conflicts between different interests and benefits

If the community cannot come to consensus on a priority, would it accept any deliberation or negotiation mechanism to resolve a dispute?

- ☐ **3 Points:** Through participatory engagement, the community and data space operator have developed a mechanism by which disputes can be handled. There is a means by which the community can involve itself in this mechanism and stay informed of decisions made after the fact.
- ☐ **2 Points:** Following participatory engagement, the data space operator has developed a mechanism to manage disputes. This mechanism is led by the data space operator and community members have no obvious way to involve themselves but can stay informed and exercise input after the fact.
- ☐ **1 Point:** The data space operator either has failed to develop a mechanism to sort through disputes or has developed its own approach that neglects to consider community interests or concerns.

SCORE — PRINCIPLES: _____ of 54 TOTAL

3. PROCESSES

Governance Structures and Decision-Making

Processes define the “**how**” of **governance**: the structures, roles, and mechanisms through which decisions about the data space are made, implemented, and reviewed. Strong processes ensure that principles are operationalized, stakeholders are engaged, and accountability is clear.

GUIDING QUESTIONS

GOVERNANCE BODIES AND ROLES

What governance bodies are needed given the community’s interests (e.g., data collaborative board, technical committees, advisory panels, independent oversight boards)?

- ☐ **3 Points:** The data space has developed and launched a set of governance bodies that match the community’s articulated interests and concerns. These each have a clear mandate, authority, and composition.
- ☐ **2 Points:** Some relevant bodies have been identified and erected to address the community’s largest concerns and interests but the overall structure is incomplete or under-specified. Some roles and functions may be unclear.
- ☐ **1 Point:** Governance bodies are absent, minimal, or tokenistic. If there are structures, they are vague and generic, with no clear relationship between the functions they serve and the community’s concerns.

What is the mandate, scope of authority, and line of accountability for these bodies? Is it clear and understandable to stakeholders?

- ☐ **3 Points:** The mandate, scope of authority, and lines of accountability for each governance body are well-defined, well-documented, and understandable to all stakeholders. Roles and rights are explicit and all stakeholders understand who decides what, on what basis, and how those decisions may be disputed or contested.
- ☐ **2 Points:** The mandate and authorities of governance institutions are partly defined. While there are some clear roles and responsibilities, these may overlap with other institutions or are unclear to outsiders. While stakeholders understand the process at a high level, engaging throughout the decision lifecycle is difficult.
- ☐ **1 Point:** Mandates, scopes of authority, and lines of accountability are undocumented or largely informal. How decisions are made is largely assumed as opposed to being clear and explicit. There is little to no understanding of who is practically responsible for how decisions are made or how these groups may be held accountable.

Does the community view these as sufficient to handle ethics, compliance, or trust assurance needs? If not, what are their objections?

- ☐ **3 Points:** The community largely views the governance bodies as sufficient to address ethics, compliance, and trust assurance needs. There is clear evidence that the governance bodies will be legitimate and effective and, where there are lingering objections or concerns, community members understand that opportunities still exist for feedback and revisions.
- ☐ **2 Points:** The community understands that there are governance bodies to address ethics, compliance, and trust assurance needs, even if acceptance of these bodies is not universal across the community. There may be serious objections that have been only partially addressed or a lack of compelling evidence that the data space will follow through on its commitments.
- ☐ **1 Point:** Governance bodies are absent or viewed as wholly insufficient, untrustworthy, or illegitimate for handling ethics, compliance, and trust assurance needs. There are major community objections that have gone unaddressed and there is a total lack of evidence that the systems are capable of responding to community needs.

DECISION-MAKING FRAMEWORK

What criteria will be used to approve new datasets, use cases, or partnerships?

- ☐ **3 Points:** Clear, documented approval criteria exist and are broadly understandable to all stakeholders and community members. These criteria are consistently applied in decision-making.
- ☐ **2 Points:** Approval criteria are defined but are partial or weakly documented (e.g. unclear exceptions, thresholds). While the criteria guide activities, governance bodies may deviate from these on occasion.
- ☐ **1 Point:** Approval criteria are informal or absent. It is not possible for outside stakeholders to understand how decisions were made and data space operations may appear entirely ad hoc.

How will evaluation balance purpose, risk, and public value?

- ☐ **3 Points:** There are defined criteria or decision processes that allow governance bodies to reasonably assess trade-offs between data space purpose, risk, and public value.
- ☐ **2 Points:** There are criteria or decision processes that allow governance bodies to assess trade-offs between data space purpose, risk, and public value but these may be uneven or weakly documented, offering limited clarity on how these affect decisions.
- ☐ **1 Point:** Evaluation criteria, if they exist, fail to consider purpose, risk, and public value simultaneously. Decisions are made on an ad hoc basis.

What mechanisms will guarantee structured input from both technical experts and affected communities?

- ☐ **3 Points:** There are well-defined mechanisms that allow for regular, structured input from technical experts and the affected communities. These mechanisms are well-documented, with all parties understanding their roles as well as the processes and information that informs decisions.
- ☐ **2 Points:** There are structured input mechanisms that incorporate both technical experts and affected communities but they may be uneven, irregular, or give excessive deference to one authority over another. There is some general guidance on how processes operate but parties lack specifics.
- ☐ **1 Point:** Structured input mechanisms are absent or informal, relying more on ad hoc decisions than any established process. There is little to no transparency and the mechanism fails to incorporate meaningful input from technical experts or the community.

How will decisions be documented (provenance, rationale, stakeholder input) to enable traceability?

- ☐ **3 Points:** Decisions are systematically documented with clear references to the provenance, stakeholders, and rationale—thus enabling clear review and accountability.
- ☐ **2 Points:** Decisions are partially accounted for or only major decisions are accounted for. This documentation offers some insight into the provenance, rationale, and stakeholders, but not enough to ensure accountability in all cases.
- ☐ **1 Point:** Decision documentation is tokenistic or absent. It is not possible to consistently trace decisions, understand the reasoning behind them, or verify stakeholder input.

STAKEHOLDER ENGAGEMENT AND PARTICIPATION

How will different stakeholder groups be engaged in ongoing governance (advisory committees, consultations, co-design workshops)?

- ☐ **3 Points:** Stakeholders are regularly and continuously engaged throughout the lifespan of the data space. Their input has a clear role in governance and evidence of their influence can be seen in the decisions that the data space makes.
- ☐ **2 Points:** Stakeholders are engaged through the data space but engagements may be uneven, irregular, or lack a direct connection to governance decisions.
- ☐ **1 Point:** Stakeholder input is minimal or tokenistic. There are no efforts to reliably solicit stakeholder input and there is no evidence that input received connects to governance.

Is this engagement “meaningful” and not tokenistic in the eyes of community members?

- ☐ **3 Points:** Community members view engagement as meaningful as there is clear evidence that their input is valued, responded to, and shapes data space outcomes.
- ☐ **2 Points:** Community members see some value in their engagement. While their input is not always acted upon, there is evidence that it is at least heard and considered.
- ☐ **1 Point:** Community members see no value in engagement because existing interactions are shallow and tokenistic. They do not see the data space as responsive to their concerns and see no real influence on governance decisions.

How will disputes among stakeholders be resolved (internal mediation, external arbitration, escalation to governance board)?

- ☐ **3 Points:** The data space has a set process for resolving disputes that it abides by in all circumstances. This mechanism is broadly accepted and well understood by all parties.
- ☐ **2 Points:** The data space has a process for resolving disputes but it may, at times, deviate from this process when operators find it convenient. There may be a lack of broad support and understanding.
- ☐ **1 Point:** Dispute resolution is handled in an ad hoc manner, with unclear procedures. There is no understanding of how decisions are made except among those making decisions.

OVERSIGHT, MONITORING, AND EVALUATION

What processes will track compliance with principles, legal frameworks, and contractual obligations?

- ☐ **3 Points:** There are systems that ensure all actions are monitored and subject to responsible oversight that can guarantee compliance with principles, legal requirements, and contractual obligations.
- ☐ **2 Points:** Actions are monitored and subject to oversight but this may be less due to established processes and more to the culture of the data space or involvement from an outside party.
- ☐ **1 Point:** Compliance tracking is absent, a concern of the data space only when problems arise. Data space operators cannot, in the course of normal business, ensure that there is meaningful compliance with principles, legal frameworks, and contractual obligations.

What indicators will be monitored to assess governance effectiveness (inclusivity, trust, efficiency, equity)?

- ☐ **3 Points:** There are clear, consistent indicators that are understandable and supported by all relevant parties. These indicators can be tracked with regularly received evidence and reporting and this reporting informs improvements to the data space.
- ☐ **2 Points:** There are indicators but they may not all be easily understandable or able to be consistently measured with objective evidence. The data space may not have a clear vehicle to facilitate improvements in response to its ability to meet indicators.
- ☐ **1 Point:** Few or no indicators are monitored. Evidence is not reliably received or objective. There are no mechanisms by which improvements can be incorporated into the data space.

How will findings be shared with stakeholders and the public?

- ☐ **3 Points:** Findings are regularly shared through channels that the community has access to and approves of. These findings are paired with clear information on methods, decisions, impact, involved stakeholders, and any other information that the public may need.
- ☐ **2 Points:** Findings are shared with the public through channels that the community could reasonably access. There may be some vagueness or limits on how much information is shared on methods, decisions, impact, and involved stakeholders that limit the ability of the community to engage.
- ☐ **1 Point:** Findings are rarely if ever shared, with there being no meaningful opportunities for stakeholders to respond or act on information.

ADAPTATION AND LEARNING

What processes will track compliance with principles, legal frameworks, and contractual obligations?

- ☐ **3 Points:** There are processes that reliably monitor compliance. These are paired with well-assigned roles and responsibilities, procedures, and mechanisms to detect, record, and correct violations.
- ☐ **2 Points:** There are processes that monitor compliance but these may have certain limitations or blindspots. The data space may lack specificity on roles, responsibilities, procedures, and mechanisms that can reliably guarantee violations are detected, recorded, and corrected.
- ☐ **1 Point:** Compliance tracking is ad hoc, informal, or absent, with little or no visibility into whether principles, laws, or contractual obligations are being met.

How will audits (internal and external) be conducted and acted upon?

- ☐ **3 Points:** Audits are regularly conducted, clearly structured, and findings are documented, communicated, and acted upon, with assigned responsibilities for follow-up and corrective actions.
- ☐ **2 Points:** Audits occur occasionally or partially, with inconsistent follow-up, unclear responsibilities, or incomplete implementation of recommendations.
- ☐ **1 Point:** Audits are rare, informal, or absent. Documentation on them is limited and there is little evidence that they inform governance.

FINANCIAL AND OPERATIONAL SUSTAINABILITY

How will resources be allocated to support governance operations?

- ☐ **3 Points:** There is a well-specified budget that denotes in clear, understandable language where funding is to be allocated. This is supported by evidence that ensures that funding is sufficient and can be sustained to ensure governance functions.
- ☐ **2 Points:** There is a budget, though it may lack some detail or be overly technical for most participants. It is unclear if the funding will be sufficient or sustainable long-term but it can ensure short-term operation.
- ☐ **1 Point:** The budget is clearly insufficient, with large gaps or contradictions. It is unlikely that the resources available can support short term or long term activity.

What funding models will sustain governance in the long term (public funding, membership fees, blended finance, value-sharing mechanisms)?

- ☐ **3 Points:** The funding model matches the context and can clearly be sustained in the long-term, giving all stakeholders confidence that the data space can be sustained as long as needed.
- ☐ **2 Points:** A funding model exists, though it may rely on short-term arrangements or be ill-fitting to the context. The data space will need to develop new systems to operate in the future.
- ☐ **1 Point:** There is no funding beyond initial seed funding. It is not clear that the data space can sustain itself beyond the initial launch.

How will risks and dependencies be mitigated?

- ☐ **3 Points:** The data space operators have proactively mapped all possible risks to the longevity of the data space and developed mitigation and contingency plans to counter these within reason.
- ☐ **2 Points:** The data space operators have identified several major risks to the longevity of the data space but this mapping is not comprehensive. The efforts to mitigate these

risks may be incomplete or ill-defined, requiring further refinement.

- ☐ **1 Point:** The data space operators have not tried to meaningfully identify risks to their activities. There is no plan if a major risk or crisis emerges.

SCORE — PROCESSES: _____ **of 54 TOTAL**

4. PRACTICES & POLICIES

Operational Mechanisms for Governance

Practices and policies provide the **concrete, enforceable rules, standards, and tools** that put governance into action. They translate principles and processes into daily operations, covering the entire data lifecycle (planning, acquisition, processing, sharing, reuse, archiving).

GUIDING QUESTIONS

DATA ACQUISITION, INVENTORY, AND PROVENANCE

How will data sources be identified, mapped, and categorized (e.g. public, private, community, crowdsourced) given community expectations?

- ☐ **3 Points:** There is a clear, transparent, and well-documented process for identifying, mapping, and categorizing data sources. These categories are clearly defined and reflect an approach in line with community expectations around data collection, processing, and (re-)use. There may be some form of direct community involvement in this work.
- ☐ **2 Points:** There is a process that can allow for data sources to be identified, mapped, and categorized—but this process may not be fully clear, transparent or well-documented, making it difficult to enforce standards. Community expectations are acknowledged but not fully reflected and there is no direct pathway to allow for community involvement.
- ☐ **1 Point:** There is no regular process for identifying, mapping, and categorizing data sources. Categories are vague, overlapping, or inconsistent and bear little relation to the expectations and aspirations of the community.

How will provenance (origin, transformations, usage) be tracked and made auditable?

- ☐ **3 Points:** The data space has a framework that allows data to be tracked in its origin, transformations, and usage across the data lifecycle. There is regular effort to ensure standardized, securely maintained, and accessible audit records.
- ☐ **2 Points:** The data space has a framework that allows some tracking of data in its origin, transformations, and usage across the data lifecycle, but there are some gaps that limit oversight. There is some effort to promote standardized, securely maintained, and accessible audit records but these may not be universally applied.
- ☐ **1 Point:** There is little to no systematic tracking of data provenance. Information about data origin, transformations, and usage is incomplete, undocumented, or inaccessible. Independent auditing is difficult or impossible, undermining trust.

What processes will ensure missing or underrepresented datasets are identified and addressed?

- ☐ **3 Points:** There are regular, ongoing processes that assess datasets and identify gaps or biases. These processes are informed by input from domain experts and the community as well as specific focus on issues of equity.
- ☐ **2 Points:** There are some processes that assess datasets and identify gaps or biases. These processes can incorporate input from domain experts and the community but may only be reactive, responding when objections are raised. There is no larger strategy that emphasizes equity.
- ☐ **1 Point:** There are no defined processes that identify missing or underrepresented datasets and gaps in knowledge are not assessed, resulting in blind spots in the data space.

ACCESS AND PERMISSIONING

Given the purpose, wider goals, and legal requirements what limitations need to be placed on use?

- ☐ **3 Points:** There are clear, well-defined limitations on data use that are explicitly linked to the stated purpose, societal goals, legal and regulatory requirements, and community expectations. These limits are communicated in a manner that is clear and accessible to all stakeholders and there is some mechanism that can enforce these limits.
- ☐ **2 Points:** There are limitations that implicitly relate to the stated purpose, societal goals, legal and regulatory requirements, and community expectations but these limits may be vague or incomplete. There is some communication but it may not penetrate deeply among stakeholders. Enforcement mechanisms are uneven and rely primarily on voluntary compliance.
- ☐ **1 Point:** There are few articulated limitations on data use beyond minimal legal requirements. Communication is minimal or non-existent and attempts to abide by requirements are unenforced. There is substantial risk of both mission drift and violation of community expectations.

How will access rights be tied to purpose, role, and compliance obligations?

- ☐ **3 Points:** Access rights are clearly defined and linked to set roles, purposes, or obligations. These restrictions are consistently applied and well-documented. Access credentials can be revoked or adjusted when conditions change.
- ☐ **2 Points:** Access rights are defined but may only be loosely connected to set roles, purposes, or obligations—instead relying on ad hoc or informal decisionmaking. Reviews of access are infrequent, manual, and reactive, which may lead to some excessive access or risk of exposure.

- ☐ **1 Point:** There are no clear access rights and no reliable way for access to be changed or modified. There is a high risk of inappropriate or non-complaint data use from actors who should not have access.

What monitoring (audit logs, anomaly detection, expiry dates) will ensure secure and appropriate data use and reassure the community?

- ☐ **3 Points:** There are comprehensive monitoring mechanisms—including audit logs, anomaly detection, and time-bound access or data controls. These measures are systematically implemented, affecting all data space stakeholders, and there are set steps that can be taken in response to violations of standards that can ensure the community's data remains secure.
- ☐ **2 Points:** Some monitoring mechanisms exist—such as basic audit logs and anomaly detection—but do not cover the full spectrum of risks or are inconsistently applied. While there are steps that can be taken in response to violations of standards, some review triggers may be manual or ad hoc.
- ☐ **1 Point:** There is little or no meaningful monitoring of data use. Audit logs are absent or rarely reviewed. There are few mechanisms to detect misuse. There is no reliable way to ensure that the community's data remains secure or that actors remain accountable.

PRIVACY, SECURITY, AND RISK MANAGEMENT

What are the risks that might arise from data collection, processing, storage, and use?

- ☐ **3 Points:** Data space operators have tried to comprehensively document and assess risks (e.g. legal, technical, community) across the data lifecycle with input from the community and other stakeholders. Responses to these risks have been identified, with certain likely or extremely dangerous risks having extensive mitigation measures. There is a regular process by which this assessment of risks can be regularly updated.
- ☐ **2 Points:** Data space operators have documented and assessed some high-concern risks (e.g. legal, technical, community) but these are not comprehensive or do not span the full length of the data lifecycle. There are some mitigation measures but these may not be appropriately prioritized or fully operationalized.
- ☐ **1 Point:** There has been little to no systematic effort to identify risks across the data lifecycle and potential harms are unacknowledged or undocumented. If there are mitigation processes, these are developed in response to threats emerging, leading to a high likelihood of community harm.

What steps to mitigate harm and risk does the community expect given previous outreach?

- ☐ **3 Points:** Community outreach has clearly identified the steps that the community expects and needs to minimize potential harms. These are clearly documented and communicated to the community in a language they understand.
- ☐ **2 Points:** The community has had to reach out to data space operators on their own behalf to raise their concerns, but the data space operator has taken some steps to address risk of harm. These have been translated into actionable documents but may not be broadly accessible or understandable.
- ☐ **1 Point:** Community outreach has not meaningfully informed harm or risk mitigation. Concerns are not gathered and outreach is tokenistic. If there has been any documentation, it is largely inaccessible and not transparent.

How will the data space respond to malicious activity from internal and external actors (e.g. data breaches, misuse, discrimination, harmful re-use)?

- ☐ **3 Points:** Clear, documented response processes exist for detecting, reporting, and addressing malicious activity, with defined roles and ways to escalate and pursue remediation as well as pathways to communicate clearly to affected stakeholders.
- ☐ **2 Points:** Some response mechanisms exist, but they are partial, reactive, or inconsistently applied, with unclear responsibilities, limited preparedness, or weak follow-through. Communication with affected stakeholders is limited or partial.
- ☐ **1 Point:** Response to malicious activity is ad hoc or undefined, with little capacity to detect incidents, coordinate action, or prevent recurrence. There is no communication to affected stakeholders.

LEGAL AND CONTRACTUAL FRAMEWORKS

What legal instruments govern the data space (e.g. MOUs, Data Use Agreements, NDAs, IP licensing)?

- ☐ **3 Points:** There is a set of commonly understood, commonly agreed upon legal instruments that are appropriate for the context and comprehensively address the needs of data space stakeholders and set obligations around major issues such as confidentiality, IP, data use standards.
- ☐ **2 Points:** There are some legal instruments but they may not fully match the context or otherwise fail to meet the full needs of stakeholders. Issues such as confidentiality, IP, and data use standards are only partially addressed.
- ☐ **1 Point:** Legal instruments are absent or completely irrelevant. There is little that can enforce standards on major issues other than the good will of participants.

How do the roles and responsibilities in these agreements impact different stakeholders?

- ☐ **3 Points:** The agreements set out clearly defined roles that equitably divide responsibilities and match the expectations of the community and other stakeholder groups. All participants understand what their duties are because the language is clear, precise, and as simplified as possible.
- ☐ **2 Points:** The agreements set out roles that define responsibilities, but these may not fully reflect community and stakeholder expectations or may impose undue burden on a handful of actors. The language may not be easily understandable to all and may require some technical expertise.
- ☐ **1 Point:** Roles and responsibilities are unclear, informal, or outright infeasible. The language in the agreement is not understood or agreeable to all data space participants.

How can this impact be clearly communicated and what steps can be taken to ensure all stakeholders comply with stated requirements?

- ☐ **3 Points:** The impact of the data space is clearly communicated to all stakeholders in a format and language they are familiar with. There are mechanisms (e.g. training, reporting) that reassure stakeholders that there is compliance with all requirements.
- ☐ **2 Points:** The impact of the data space is communicated externally but may not be available in a language and format that is broadly comprehensible. Mechanisms to reassure stakeholders may be partial or reactive.
- ☐ **1 Point:** The impact is poorly communicated or absent entirely. Community members are only informed on an ad hoc basis and not in a manner they can readily engage with.

INTEROPERABILITY AND STANDARDS

What technical standards (metadata, ontologies, APIs, federated models) will ensure interoperability?

- ☐ **3 Points:** Technical standards are clearly defined, widely adopted, and consistently applied leading to interoperability across systems and stakeholders.
- ☐ **2 Points:** Technical standards are present but they are inconsistently applied or lack sufficient depth, limiting interoperability in some cases.
- ☐ **1 Point:** Technical standards are minimal or absent, making interoperability impossible to guarantee.

How will alignment with broader values and interests be secured?

- ☐ **3 Points:** There is explicit alignment between broader societal goals, community values, and organizational aspirations and the technical standards. These are ensured through governance processes that embed stakeholder input and oversight.
- ☐ **2 Points:** There is some alignment between broader societal goals, community values, and organizational aspirations. There may be some conflicts that prevent stakeholders or community members from having their voices fully heard.
- ☐ **1 Point:** There is no alignment between broader values and interests and the technical standards, which are rote and developed with little consideration for the larger context.

CAPACITY BUILDING AND KNOWLEDGE SHARING

What training is needed for data stewards, policymakers, community representatives, and technical staff to align institutional culture with community expectations?

- ☐ **3 Points:** There is comprehensive, role-specific training that is routinely delivered and updated to match needs, ensuring all stakeholders understand community expectations.
- ☐ **2 Points:** There is some training but it is incomplete or irregular, leaving gaps in understanding that limit the ability of stakeholders to understand and address community expectations.
- ☐ **1 Point:** Training is minimal or tokenistic and there is little support between the guidance provided and community expectations.

How will best practices and lessons learned be documented and shared across stakeholders?

- ☐ **3 Points:** Best practices and lessons learned are systematically documented, accessible, and actively shared with all stakeholders, supporting continuous learning and improvement.
- ☐ **2 Points:** Best practices and lessons learned are only partially documented, focusing on only a handful of issues, limiting their value for stakeholders.
- ☐ **1 Point:** Best practices and lessons learned are not documented and any learning or improvement occurs only informally.

MONITORING, EVALUATION, AND CONTINUOUS IMPROVEMENT

How will governance practices be regularly audited (internal review, third-party evaluations, community-led oversight)?

- ☐ **3 Points:** Governance practices are routinely audited in a process that aligns with the overall purpose and community expectations. The process by which auditing occurs is documented and well-understood by all stakeholders.
- ☐ **2 Points:** Governance practices are irregularly or partially audited and this auditing supports but is not fully aligned with the purpose and community expectations. There is some documentation that can ensure that audits are consistently handled.
- ☐ **1 Point:** Audits are rare, informal, or absent. There is little evidence of review, oversight, or continuous improvement.

What KPIs will be used to measure the effectiveness of policies (trust, inclusivity, data quality, resilience)?

- ☐ **3 Points:** The data space has outlined various KPIs that can be used to evaluate trust, inclusivity, data quality and resilience. These are regularly monitored, reported, and used to inform policy improvements.
- ☐ **2 Points:** The data space has a few KPIs that could assess trust, inclusivity, data quality, and resilience, but they are incomplete or inconsistently applied. There is only a weak link to governance improvement.
- ☐ **1 Point:** KPIs are absent, poorly defined, or rarely monitored. There is little evidence of policy effectiveness or guidance that can lead to improvement.

How will feedback from evaluations be integrated into updated policies?

- ☐ **3 Points:** Feedback from evaluations is systematically reviewed and regularly incorporated into policy updates. There is a clear process that ensures learning informs governance.
- ☐ **2 Points:** Some feedback is considered but their integration is partial or informal. Lessons cannot be said to consistently shape governance.
- ☐ **1 Point:** Feedback from evaluations is rarely if ever used. There is no evidence that lessons are gathered or that any feedback shapes governance.

EXIT, ARCHIVING, AND END-OF-LIFE POLICIES

What does the community expect about data handling given the stated purpose and risks?

- ☐ **3 Points:** Community expectations are clearly understood, documented, and incorporated into exit, archiving, and end-of-life policies, ensuring data is handled responsibly, securely, and in alignment with purpose and risk considerations.
- ☐ **2 Points:** Some expectations are recognized, but policies for exit, archiving, or end-of-life are partial, inconsistent, or weakly aligned with community priorities and risk mitigation.
- ☐ **1 Point:** Community expectations are unclear, unassessed, or ignored, and exit, archiving, or end-of-life practices are ad hoc, inconsistent, or misaligned with stated purposes and risks.

How will data be archived, deleted, or transitioned at the end of its lifecycle?

- ☐ **3 Points:** There are clear, documented procedures for archiving, deleting, or transitioning the data space. These are consistently applied and there are opportunities for community review for accountability.
- ☐ **2 Points:** Some procedures exist but they may not capture all data. There are few opportunities for the community to exercise review.
- ☐ **1 Point:** Procedures for end-of-life data handling are absent and there is substantial risk of misuse or unwanted retention.

How will communities and stakeholders be consulted before data is retired or repurposed?

- ☐ **3 Points:** Communities and stakeholders are actively and systematically consulted through clearly defined mechanisms (such as surveys, advisory boards) before any decisions are made about what to do at the end of the data space's life. Feedback from these is documented, reviewed, and meaningfully incorporated into decisions—with transparency by the data space on how it is acting on the input.
- ☐ **2 Points:** Consultation occurs but not in a way that allows the full community to participate or imposes other limits (e.g. occasional, time-limited meetings, surveys that fail to capture all questions). Feedback is collected but the relationship between it and the actions taken is indirect and may be difficult for some stakeholders to understand.
- ☐ **1 Point:** There is no meaningful consultation. Feedback is disregarded or ignored and the data space operates without consideration for community needs.

SCORE TOTAL: PRACTICES: _____ of 66 TOTAL

OVERARCHING SCORE TOTAL: _____ of 219 TOTAL



A ROADMAP FOR
DIGITAL SELF-DETERMINATION
IN DATA SPACES