DS4Skills

COMMON EUROPEAN DATA SPACE FOR SKILLS

D2.1 Data Governance Framework and Templates

March 20th, 2026

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D2.1 Data Governance Framework and Templates

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Authors	Matthias De Bièvre (PTX), Olivier Dion (PTX) Sylvia Faria (PTX)
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Executive summary

This document constitutes the intermediate version of Deliverable D2.1 – Data Governance Framework and Templates for the DS4SKILLS project (Data Space for Skills). It is submitted to the European Commission at the mid-point of the project as a structured account of the work accomplished, the governance architecture proposed, the methodology adopted, and the roadmap to completion.

This is a work in progress document that will evolve during the project as the final governance model and templates will emerge from a structured, evidence-based process: grounded in the concrete requirements of participating use cases; aligned with the building blocks and business models being developed in parallel; consistent with the evolving EU regulatory landscape (Data Governance Act, GDPR, NIS2, EU AI Act, eIDAS2); and interoperable with other Common European Data Spaces. This is the approach DS4SKILLS has deliberately adopted. The next steps are presented in the Roadmap section 7.

At this stage, the project has completed three steps:

- A governance requirements survey, distributed to and completed by all DS4SKILLS use cases, capturing their needs across 16 governance themes;
- A multi-tier governance architecture proposition, defining the roles of the European Data Innovation Board (EDIB), the Data Space Support Centre (DSSC) and a Data Space Interoperability Framework (DSIF), the DS4SKILLS consortium as future Sectoral Governance Authority (the institutional form of which is being defined in WP2), certified data intermediaries, and participants;
- A formal six-step design methodology, providing a rigorous, traceable, and reusable process to convert governance policy intent into enforceable controls, technical specifications, and conformance checks.

DS4SKILLS also positions itself at the intersection of two strategic ambitions: first, establishing a credible and scalable governance framework for the Education and Skills sector; and second, contributing — together with other Common European Data Spaces — to a shared governance baseline that can be reused across sectors. The project has already initiated concrete collaboration with TEMS (Trusted European Media Space), built around a live cross-sectoral use case for exchanging fact-checking data to generate educational content, and is actively seeking alignment with Cultural Heritage (CHDS), Tourism (DEPLOYTOUR),Mobility and the other common European data spaces.

This deliverable is honest about what remains to be done. Seven governance topics, including liability frameworks, certification and audit, Trustworthy AI compliance, and code of conduct templates, are documented as open questions, each with a defined approach, responsible parties, and a clear timeline for resolution. The final version of D2.1 will be submitted in Q1 2027, integrating the complete control catalogue, code of conduct, and contract templates.

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1 Introduction and Context

1.1 Project Background

DS4SKILLS is a European project building a Data Space for the Education and Skills sector, enabling trusted sharing of learning data, skills data, credentials, and related services among public and private stakeholders across Europe. The project brings together a consortium of use case leaders, technology providers, governance experts, and sectoral actors. Prometheus-X leads Work Package 2 on governance and business models, coordinating the governance design process across the consortium.

Work Package 2 (WP2) is responsible for defining the governance and business model of the data space. Deliverable D2.1 covers the governance framework: the legislative, administrative, and contractual rules governing access rights, data processing, usage, and sharing, in a manner that is trustworthy, transparent, and legally compliant.

1.2 Scope and Purpose of this Deliverable

As described in the project description of work, D2.1 shall provide:

- Legislative, administrative, and contractual rules covering access rights, data processing, usage, and sharing;
- A code of conduct ensuring ethical and legal data sharing;
- Contract templates to support data providers and users;
- Guidelines to help stakeholders comply with regulations and adopt best practices.

This intermediate report documents the work completed to date, the governance architecture established, the requirements gathered from use cases, and the structured methodology that will produce the remaining artefacts. It is deliberately transparent about the complexity of this work and the iterative nature of the process.

1.3 Why a Phased Approach is the Right One

Producing a final data governance framework in the first year of a multi-year project would be premature and, ultimately, counterproductive. The reasons are structural:

- Governance rules must be grounded in actual use case requirements. Without first understanding what data providers, consumers, and platform operators actually need — in terms of liability, trust, consent, security, and interoperability — any framework risks being theoretical and unused.
- Business models and governance are tightly coupled. The governance model cannot be finalised before the data space's business model is understood: who pays for what, who certifies whom, and who is liable under which conditions are inseparable questions.

- Regulatory alignment is a moving target. The EU AI Act, eIDAS2 implementing acts, and DGA secondary legislation continue to evolve and are planned for adoption in 2027. A governance framework that ignores this risks being non-compliant before it is even published.
- Cross-data-space interoperability requires coordination. DS4SKILLS is one of several Common European Data Spaces. Proposing governance rules in isolation, without alignment with TEMS, CEEDS, DEPLOYTOUR, or Mobility, would undermine the very interoperability goal that justifies the European data space ecosystem.
- Governance must be technically enforceable. Rules that cannot be implemented in building blocks are not governance — they are aspirations. The DS4SKILLS methodology requires every rule to have a control ID, an evidence requirement, and a technical enforcement point before it is considered done.

2 Governance Architecture

2.1 Overview: A Multi-Tier Model

The DS4SKILLS governance architecture is built on a strict separation of roles across four distinct layers. The fundamental principle is that no single entity may simultaneously define standards, provide technical intermediation services, and accredit its own compliance. This separation ensures neutrality, market openness, and trust, the three foundations of a credible data space.

The four layers, from highest to lowest, are:

- EU Governance Layer: standard-setting and policy bodies (EDIB, DSSC) operating at European level, funded publicly, with no operational or commercial role.
- Sectoral Governance Layer: DS4SKILLS — through its consortium governance body (the future Sectoral Governance Authority, whose form is being defined within WP2) — defining sector-specific rules, ontologies, and the conformance scheme.
- Trust & Assurance Layer: independent certification accreditors validating compliance of intermediaries and participants.
- Market Infrastructure Layer: competitive, DGA-certified data intermediaries providing technical and functional services.

A participant layer sits across all layers, connecting data providers and consumers who operate under the rules defined by the governance and market layers.

An important architectural constraint governs the model: participants in the Trust & Assurance Layer cannot participate in the Market Infrastructure Layer, and vice versa. The EU Governance Layer cannot participate in any of the lower layers. This clean separation is non-negotiable.

2.2 Roles Definitions and Responsibilities

The following table summarises the roles, their layer, core functions, funding models, and constraints. This segmentation and proposition of roles is proposed by DS4SKILLS and will be iterated upon with the respective bodies.

Role	Layer	Function	Funding	Constraints
European Data Innovation Board (EDIB)	EU Governance Layer	Validates de jure standards under DGA	Public funding	Cannot provide technical services
Data Space Support Centre (DSSC)	EU Governance Layer	Maintains DSIF – minimal interoperability standards (technical, semantic, organisational, legal)	Public funding	Cannot act as data intermediary or accreditor
DS4SKILLS Governance Body (future DSGA – Sectoral Governance Authority)	Sectoral Governance Layer	Will define sectoral rules, ontologies, trust frameworks, and conformance scheme. Form and structure to be defined within WP2. Currently the DS4SKILLS consortium acts collectively as governance authority.	Public funding + membership fees (TBD)	Role separation with intermediaries and accreditors required
Certification Accreditor	Trust & Assurance Layer	Validates compliance of intermediaries and participants against DSIF and sectoral standards	Paid by entities seeking certification	Cannot provide intermediation services
Data Space Intermediary (e.g., VisionsTrust, Sovity, Athumi)	Market Infrastructure Layer	Provides technical services: catalogue, IAM, consent, contract, clearing house, policy enforcement	Subscriptions, commissions, premium services	Cannot define standards or self-certify
Data Space Participant (provider or consumer)	Participant Layer	Shares or consumes data/services; defines own access policies and usage conditions	Monetises own data/services	Must comply with sectoral conformance scheme
Technology Providers / OSS Communities	Ecosystem Enablers	Provide components (connectors, IAM, AI tools); contribute to specifications and reference implementations	Commercial / open-source	Must align with DSIF

2.3 Layers Beyond DS4SKILLS: The Critical Importance of EDIB, DSSC and DSIF

A critical architectural observation must be underscored for the European Commission: the upper layers of this framework — the EDIB, the DSSC, and the Data Space Interoperability Framework (DSIF) — do not depend on DS4SKILLS, but DS4SKILLS and every other sectoral data space fundamentally depend on them.

The current situation is one of genuine fragmentation. Multiple data space initiatives are developing in parallel — each with partially incompatible technical standards (IDSA Dataspace Protocol, Gaia-X, Eclipse XFSC, iSHARE, SIMPL), distinct governance patterns, and different trust frameworks. The DSSC currently provides valuable guidelines, blueprints, and best practices. But it does not yet define, maintain, or enforce a binding interoperability framework. There is no neutral, authoritative place where data space projects can converge on shared minimum requirements for technical, semantic, organisational, and legal interoperability.

DS4SKILLS therefore puts forward a concrete proposal: the DSSC should be mandated and resourced to define a formal Data Space Interoperability Framework (DSIF) — a minimum set of requirements that every Common European Data Space must satisfy to be interoperable. This proposal is not made in isolation. It is actively supported by the dsif.eu community, a growing coalition of data space practitioners, technology providers, and governance experts who have independently identified this gap and are calling for exactly this kind of neutral, EU-level coordination mechanism.

Such a DSIF would define, at minimum: technical standards (APIs, connectors, identity, contract negotiation protocols); semantic standards (shared vocabularies, data models, serialisation formats); organisational rules (onboarding patterns, trust framework baselines); and legal baselines (minimal contract clauses, liability patterns, compliance declarations). Sectoral data spaces such as DS4SKILLS would then define their own extensions on top of this baseline — never as replacements for it.

Similarly, the EDIB's role in validating de jure standards for data spaces under the DGA is essential to give legal certainty to intermediaries and participants. DS4SKILLS supports a strengthened EDIB mandate and will submit its sectoral conformance scheme for EDIB review in due course.

2.4 Regulatory Alignment

The DS4SKILLS governance framework is designed to be fully compliant with the applicable EU regulatory framework. The key alignments are:

- Data Governance Act (DGA): all data intermediaries operating in the DS4SKILLS data space are explicitly positioned as DGA Data Intermediation Services Providers, subject to neutrality, no-data-reuse, separate legal entity, logging, interoperability, and continuity obligations.

- GDPR: role qualification (controller, processor, joint controller) is assessed per building block and per data processing function. The catalogue, IAM, logging, and consent modules each carry distinct GDPR role implications that will be specified in the control catalogue.
- NIS2: treated as a binding requirement, not optional. Intermediaries and participants within scope must implement cybersecurity risk management, incident reporting, governance accountability, and supply chain risk controls.
- EU AI Act: AI-enabled services offered through the data space must include explainability documentation and EU AI Act compliance declarations. These are captured as MUST-level governance controls with defined evidence requirements.
- eIDAS2: identity architecture must support EU Digital Identity Wallets, verifiable credentials, and attribute attestations, ensuring alignment with the emerging European digital identity ecosystem.

3 What We Have Done: Phase 1 Achievements

3.1 Use Case Requirements Survey

The first concrete step in building the initial governance framework model was to ensure it is grounded in actual needs. A structured requirements survey was designed and distributed to all DS4SKILLS use cases. The survey covered eight thematic sections:

1. Data Quality, Provenance, and Interoperability
2. Legal and Organisational Trust
3. Security, Privacy, and Consent Management
4. Ethical and Responsible AI Use
5. Business Continuity and Sustainability
6. Governance and Participation Rules
7. Sectoral Education and Skills Standards
8. Blockers and Incentives for Participation

Responses were received from all use case leaders. The responses represent a diversity of participant profiles (use case leaders, data providers, multi-role actors) and a range of operational scenarios (data sharing, data consumption, API integration, identity and credential management, policy oversight).

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3.2 Governance Model Proposition

Based on the survey analysis, the regulatory landscape, and the DS4SKILLS consortium's technical expertise, a full governance model proposition was produced and validated internally. This proposition defines:

- The multi-tier architecture (described in Section 2);
- The separation of powers between governance, assurance, and market layers;
- The role of DS4SKILLS as Sectoral Governance Authority, and its relationship with EDIB and DSSC;
- The role of Prometheus-X as WP2 lead, coordinating governance design, and the question of the DS4SKILLS Sectoral Governance Authority's future institutional form (to be defined within WP2);
- The business and funding models for intermediaries, participants, and governance bodies;
- The regulatory alignment with DGA, GDPR, NIS2, eIDAS2, and EU AI Act.

3.3 Design Methodology

To ensure the governance framework is not merely a policy document but a set of fair, technically implementable controls, DS4SKILLS has developed and adopted a formal six-step design methodology. This methodology transforms high-level governance intentions into normative rules, audit-ready controls, and building-block-level technical specifications.

The methodology is structured as follows:

- Step 0 — Setup governance-of-governance (one-time): establish decision rights, a decision log, and a versioning approach. Confirm role separation in line with the DS4SKILLS governance architecture.
- Step 1 — Identify needs using a Topic Canvas (per topic): convert governance intentions into unambiguous requirements. Each Topic Canvas defines scope, risk drivers, operational scenarios, and minimal acceptance criteria.
- Step 2 — Define the assurance logic and audit triggers (per topic): map requirements to assurance levels (L1: self-declaration; L2: independent audit; L3: continuous monitoring) and define audit triggers as objective conditions, not opinions.
- Step 3 — Reuse standards and patterns before inventing new ones (per topic): compile a pattern shortlist from existing governance frameworks, regulations, and codes of conduct. Produce a reuse decision (Adopt / Adapt / Extend / Defer) for each. This step is central to cross-data-space interoperability.
- Step 4 — Codify into governance controls and rulebook text (per topic): every requirement becomes a formal control. Each control carries a unique ID (e.g., DS4S-GOV-LIA-01), a normative statement (MUST / SHOULD / MAY), rationale, applicability conditions, assurance level, evidence requirements, verification method, and a non-conformance and remediation path.

- Step 5 — Translate controls into technical enforcement specifications (per topic): specify, together with building block technical teams (through Prometheus-X), exactly which field in which component captures each control, in what format, and validated how.
- Step 6 — Validate with DS4SKILLS partners and lock conformance (per topic): run partner workshops to validate practicality and fairness of rules and evidence requirements; finalise onboarding checklists, remediation paths, and appeals procedures.

The methodology assigns clear, non-overlapping responsibilities aligned with the DS4SKILLS governance architecture: DS4SKILLS (as future Sectoral Governance Authority) owns the sectoral rules and validates Rulebook and Rolebook content; Prometheus-X (as WP2 lead) drafts the specification controls, runs standards and pattern reuse analysis, and ensures traceability; Prometheus-X (with its technical members such as VisionsTrust, StartinBlox, etc) co-designs and authors the implementable technical specifications (schema, APIs, workflows, test cases) and confirms feasibility; DS4SKILLS partners validate practicality and provide adoption feedback; and, where applicable, independent assurance actors review auditability and evidence completeness, especially for L2/L3 controls.

4 Sectoral Requirement Analysis

The following table synthesises the governance requirements collected from DS4SKILLS use cases, the proposed implementation approach through data space building blocks, and the next steps required. Requirements are classified as MUST (mandatory — requested by 75% or more of respondents, or identified as legally required) or CAN (recommended — reflecting strong but not universal demand).

Governance Theme	% UC	Level	PTX Building Block / Implementation	Next Steps
Data Quality Assurance	90%	**MUST**	Data Veracity Assurance building block	Workshop with DVA component owner
Data Provenance Tracking	100 %	**MUST**	Contract Manager component (VisionsTrust)	Specify provenance schema
Metadata & Interoperability	100 %	**MUST**	Catalogue Manager component (VisionsTrust)	API documentation standards
Governance, Accountability & Liability	100 %	**MUST**	Catalogue Manager (terms upload adaptation needed)	PTX to specify; members to develop
Trust Mechanisms for Participants	37%	**CAN**	Identity Management component (certification criteria)	DS4SKILLS partners to define criteria

Code of Conduct for Participants	37%	**CAN**	Identity Management component	DS4SKILLS to draft code of conduct
Trust Mechanism for Data Space Intermediary	75%	**MUST**	Governance/legal alignment required	DS4SKILLS to define intermediary criteria + contract template
Liability Framework	75%	**MUST**	Catalogue Manager (liability level fields)	DS4SKILLS to define liability tiers
Privacy & Consent Management	100 %	**MUST**	Consent Manager + Personal Data Intermediary (Athumi use case)	Include consent interoperability protocol
Data Minimisation & Anonymisation	75%	**MUST**	De-identification solution	Identify applicable use cases
Security Certification	50%	**CAN**	Catalogue Manager (certification level fields)	PTX to specify; DS4SKILLS to validate
Trustworthy AI – Explainability	100 %	**MUST**	Catalogue Manager (explanation upload fields)	PTX to specify; DS4SKILLS to validate
Trustworthy AI – EU AI Act Compliance	100 %	**MUST**	Catalogue Manager (declaration upload)	PTX to specify; DS4SKILLS to validate
Trustworthy AI – Bias & Fairness	50%	**CAN**	Trustworthy AI assessment module	Workshop with TAI component owner
Service Continuity & SLA	62%	**CAN**	Catalogue Manager (SLA description fields)	PTX to specify; DS4SKILLS to validate
Semantic Interoperability (ESCO, xAPI, Caliper)	100 %	**MUST**	EDGE-TRANSLATOR + LRC components	Ensure all use cases respect standards

This analysis confirms that a significant portion of governance rules are technically implementable through existing building blocks — primarily the Catalogue Manager, the Contract Manager, the Identity Management component, and the Consent Manager, as developed and operated through the Prometheus-X digital commons. However, in each case, adaptation work is required: field definitions, declaration templates, SLA structures, and certification levels must be specified by DS4SKILLS and technically implemented by consortium members. This specification work is the core activity of the next project phase.

5 Open Questions and Remaining Work

The following governance topics are not yet resolved. They are documented here with full transparency, together with the methodology steps and collaborative approach that will be used to address them. These are not gaps — they are the structured work programme for the next phase of the project.

ID	Topic	Open Question	Approach (Methodology Steps)	Target
A	**Liability & Transparency**	How to define liability tiers between participants and intermediaries? What mandatory disclosures are required?	Step 1–4 Topic Canvas + partner workshop	Q2 2026
B	**Certification & Audit**	What certification levels are required? When does self-declaration suffice vs. independent audit?	Step 2 – Assurance logic + Step 3 – Standards reuse	Q2 2026
C	**Trustworthy AI**	What evidence is required for explainability and EU AI Act compliance declarations? How is bias audited?	Step 3–5 + TAI building block workshop	Q3 2026
D	**SLA / Service Continuity**	What minimum availability guarantees are required? How are SLA fields standardised in the catalogue?	Step 4–5 + PTX technical spec	Q2 2026
E	**Cross-Data-Space Baseline**	What governance controls are portable to other data spaces? What is DS4SKILLS-specific?	Step 3 cross-space register + TEMS/other data space alignment sessions	Q3 2026
F	**Code of Conduct & Contract Templates**	What contractual clauses are mandatory? What are the standard templates for data sharing agreements?	Step 4–6 + legal partner review	Q3–Q4 2026
G	**Consent Interoperability**	How is consent revocation propagated across participants and intermediaries?	Athumi use case + Consent Manager spec	Q3 2026

In every case, the open question is addressed by a specific combination of methodology steps, a defined set of responsible actors (DS4SKILLS consortium, Prometheus-X as WP2 lead, legal partners, and building block technical teams), and targeted partner workshops. No topic is left to individual interpretation: the methodology ensures that the outcome is a formally codified, auditable control — not a policy statement.

6 Cross-Data-Space Ambition

6.1 Positioning within the Common European Data Spaces Ecosystem

DS4SKILLS does not operate in isolation. It is one of a growing family of Common European Data Spaces, each developing sectoral governance frameworks for their domain. The risk, without deliberate coordination, is fragmentation: incompatible governance rules, duplicated efforts, and an interoperability gap that undermines the very purpose of the European data space strategy.

DS4SKILLS has adopted from the outset a principle of cross-data-space governance alignment. The DS4SKILLS design methodology explicitly tags every control as either Baseline (portable to other data spaces) or Sector Extension (DS4SKILLS-specific). This tagging, maintained in a Cross-Space Baseline Register, allows governance artefacts to be reused, adapted, and extended by other data spaces — reducing duplication and increasing systemic coherence.

DS4SKILLS proposes to work, together with other Common European Data Space projects and the DSSC, towards a common governance baseline: a minimum set of controls, contract clauses, and conformance patterns that every data space can adopt, and on top of which sectoral extensions are built. This approach mirrors the technical interoperability model of the DSIF, and extends it to the governance and legal dimensions.

6.2 Active and Planned Collaborations

DS4SKILLS is actively engaged in cross-data-space governance collaboration. The following table summarises the current status of these partnerships.

Data Space	Domain	Status	Collaboration Focus	Timeline
TEMS(Trusted European Media Space)	Media / Education	**Active**	First concrete cross-sectoral use case: exchange of fact-checking data to generate educational content. Joint governance baseline register in progress; cross-space control mapping underway.	Q2–Q3 2026
Cultural Heritage Data Space(CEEDS)	Cultural Heritage	**In discussion**	Exploring cultural heritage data to be used in skills / education solutions.	Q3 2026

Tourism Data Space(DEPLOYTOUR)	Tourism	**In discussion**	Exploring tourims data to be used in skills / education solutions.	Q3 2026
Mobility Data Space	Mobility	**In discussion**	Common consent revocation protocol and identity framework alignment	Q4 2026

TEMS (Trusted European Media Space) represents the most mature and structurally significant collaboration. DS4SKILLS and TEMS are developing a concrete cross-sectoral use case: the exchange of fact-checking data from the media domain to generate educational content within the skills domain. This use case raises real, shared governance questions — on provenance, liability, consent, and data quality — that make it an ideal testbed for a joint governance baseline. DS4SKILLS and TEMS have begun mapping shared governance controls and building a Baseline Register of portable rules. This joint work is a proof of concept for the broader cross-data-space governance alignment ambition.

DS4SKILLS calls on the European Commission to support and actively encourage this type of cross-data-space governance collaboration, and to consider mechanisms — through the DSSC or EDIB — that formally recognise and reward governance reuse and interoperability investment.

7 Roadmap to the Final D2.1

The following roadmap details the planned activities, outputs, and responsibilities from the current date (March 2026) through to the submission of the final version of D2.1 in Q1 2027. Each milestone is directly traceable to a step in the governance design methodology described in Section 3.3.

Period	Milestone / Activity	Expected Output	Responsible
Q2 2026	**Step 0 – Governance-of-governance setup**	Decision rights matrix, versioning approach, decision log template	Prometheus-X + DS4SKILLS Coordination
Q2 2026	**Step 1 – Topic Canvases A, B, D (Liability, Certification, SLA)**	Topic Canvas set + prioritised requirements list per topic	Prometheus-X + Partner workshops
Q2 2026	**TEMS joint baseline session**	Cross-space baseline register (portable controls identified); cross-sectoral use case governance requirements mapped	Prometheus-X + TEMS consortium

Q3 2026	**Step 2–3 – Assurance logic + Standards reuse for Topics A, B, C, D**	Assurance policy (L1/L2/L3) + standards mapping table	Prometheus-X + Accreditor + Partners
Q3 2026	**Step 4 – Control Catalogue v1 (Rulebook + Rolebook)**	Control Catalogue with IDs, normative statements, evidence, verification	Prometheus-X + DS4SKILLS + VisionsTrust
Q3 2026	**Cultural Heritage & Tourism data space collaboration sessions**	Joint governance alignment report	DS4SKILLS + CEEDS + DEPLOYTOUR
Q4 2026	**Step 5 – Technical Enforcement Specs per building block**	Technical Spec Sheets per building block + test plan	Prometheus-X + VisionsTrust + PTX members
Q4 2026	**Step 6 – Partner validation workshops + Conformance lock**	Signed Specification packages per topic	DS4SKILLS Consortium
Q1 2027	**Code of Conduct + Contract Templates v1**	Draft code of conduct, standard contract clauses, liability templates	Legal partners + DS4SKILLS consortium
Q1 2027	**D2.1 Final Version submitted to European Commission**	Complete governance framework + all templates	Prometheus-X + DS4SKILLS Consortium

The final version of D2.1 will include the complete governance framework comprising: the Control Catalogue with all normative rules, evidence requirements, and verification methods; the Rulebook and Rolebook; Technical Specification Sheets per building block; the Code of Conduct for data space participants; and standard contract templates including data sharing agreements, liability clauses, and onboarding conditions.

8 Conclusions

This intermediate deliverable demonstrates that DS4SKILLS has adopted a rigorous, evidence-based, and methodologically sound approach to building its data governance framework. Rather than producing a premature document that would require complete revision once use case realities, business models, and cross-sector alignments become clear, the project has invested in the foundations: a multi-tier governance architecture, a use-case-grounded requirements analysis, and a formal six-step methodology that guarantees every governance rule will be enforceable, technically implemented, and partner-validated before it is finalised.

Three dimensions of this work deserve particular attention from the European Commission:

- The upper governance layers — EDIB, DSSC, and the proposed Data Space Interoperability Framework (DSIF) — are not DS4SKILLS outputs, but they are essential to DS4SKILLS and to the entire European data space ecosystem. The current fragmentation of standards and solutions is a concrete risk. DS4SKILLS, supported by the dsif.eu community, calls on the European Commission to mandate the DSSC to formalise the DSIF, and to make alignment with it a condition of EU co-funding for data space projects.
- The cross-data-space governance alignment ambition — already active with TEMS and in progress with Cultural Heritage, Tourism, and Mobility data spaces — is both strategically important and concretely underway. It deserves structural support from the Commission and the DSSC.
- The final governance framework, expected in Q1 2027, will be a complete, implementable, and auditable set of rules — not a policy wish list. The methodology adopted ensures this.

DS4SKILLS is committed to transparency, rigour, and collaboration in this work. The present document is an accurate reflection of where the project stands, where it is going, and how it will get there.

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Annex A - Glossary

Term	Definition
DSIF	Data Space Interoperability Framework — a proposed framework, not yet formally established, that would define minimal interoperability requirements (technical, semantic, organisational, and legal) that all Common European Data Spaces must satisfy. DS4SKILLS proposes that the DSSC be mandated to develop and maintain this framework. The proposal is supported by the dsif.eu community (https://dsif.eu).
DSGA	Data Space Governance Authority — the sectoral entity responsible for defining sector-specific governance rules. In DS4SKILLS, the institutional form of the DSGA is being defined within WP2; the DS4SKILLS consortium currently acts collectively as the governance authority.
EDIB	European Data Innovation Board — the EU-level body established by the Data Governance Act to advise on data space standards and intermediation services regulation.
DSSC	Data Spaces Support Centre — an EU body that currently produces guidelines, blueprints, and best practices for data space development. DS4SKILLS proposes that the DSSC take on the additional mandate of defining and maintaining a formal Data Space Interoperability Framework (DSIF).
DGA	Data Governance Act — EU Regulation establishing the framework for data intermediation services and data spaces.
PTX / Prometheus-X	Lead partner for WP2 (Governance and Business Models) in DS4SKILLS. Responsible for coordinating the governance design process, drafting specification controls, and maintaining the Prometheus-X open-source building blocks used as the data space's technical infrastructure.
TEMS	Trusted European Media Space — a sister Common European Data Space with which DS4SKILLS has initiated the first cross-sectoral governance collaboration, built around a use case for exchanging fact-checking data to create educational content.
MUST / SHOULD / MAY	Normative language used in governance controls: MUST = mandatory requirement; SHOULD = strong recommendation; MAY = optional.
L1 / L2 / L3 Assurance	Three-level assurance model: L1 = self-declaration; L2 = independent third-party audit; L3 = continuous monitoring and surveillance.
Control Catalogue	The core governance artefact: a structured register of all governance controls, each with a unique ID, normative rule, rationale, evidence requirements, and technical enforcement point.
ESCO	European Skills, Competences, Qualifications and Occupations — the EU multilingual classification of skills used as the mandatory semantic standard for skills data in DS4SKILLS.

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xAPI / Caliper	Technical standards for learning experience data, mandated for learning activity data exchanged through the DS4SKILLS data space.

Annex B - DS4SKILLS Governance Methodology Summary

The table below provides a concise reference summary of the six-step design methodology adopted by DS4SKILLS, as described in Section 3.3.

Step	Name	Objective	Key Output(s)
0	**Setup governance-of-governance**	Establish decision rights, decision log, and versioning. Confirm role separation.	Decision rights matrix | Decision log template | Backlog
1	**Topic Canvas**	Convert governance themes into unambiguous, scoped requirements with acceptance criteria.	Topic Canvas set | Prioritised requirements list
2	**Assurance logic**	Map requirements to L1/L2/L3 assurance levels; define audit triggers as objective conditions.	Assurance policy per topic | Audit trigger list | Evidence minimum per level
3	**Standards reuse**	Compile existing patterns; decide Adopt / Adapt / Extend / Defer. Build cross-space baseline.	Standards mapping table | Cross-space baseline register
4	**Control Catalogue**	Convert requirements into normative controls with IDs, evidence, verification, and remediation paths.	Rulebook | Rolebook | Control Catalogue
5	**Technical specs**	Define enforcement points in building blocks: fields, formats, workflows, test cases.	Technical Spec Sheets per building block | Test plan
6	**Partner validation**	Validate practicality and fairness; lock conformance checks and onboarding checklists.	Signed Specification packages | Change log