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*From Transparency and Reuse of Public-Sector Information to Data Spaces: The Evolution of EU Regulation**

Julián Valero Torrijos
(Full Professor of Administrative Law at the University of Murcia)

ABSTRACT The regulation of eGovernment and transparency of public bodies has mainly focused on a document-based management model. However, technological innovation demands a different approach based on data and the involvement of private entities. This paper analyses the most recent evolution of European regulation in this field, characterised by the central role of governance and data spaces.

1. *EU Regulation on Open Data and Reuse of Public-Sector Information as the Starting Point*

One of the main objections to the most widespread information management systems in the field of Public Administration from the perspective of technological innovation is the absence of an advanced approach when regulating access to information. Especially regarding the conditions under which it must take place to facilitate the subsequent reuse of information by third parties, even for commercial purposes. Not only the most common document management models and legal frameworks on technological innovation have considered information and data as a tool to meet the internal needs of the organisation, but they have usually ignored or underestimated potential subsequent reuse by third parties until very recently.[1] It is therefore essential to take the current reality as the starting point to assess the changes needed to move towards an innovative model of document management. A model that facilitates access to and reuse of administrative information based on the parameters of open data. As Osimo remarks, transparency can not only be a catalyst for e-Government but, above all, a catalyst for the transformation of the public sector as a whole.[2]

The initial push for the transformation of the regulation on access to public sector information came from the first EU legal framework on the reuse of administrative information, specifically, Directive 2003/98/EC of 17 November 2003. The aim was to promote the creation of a European-wide market for access to public-sector information, trying to overcome the barriers of a fragmented scenario by establishing homogeneous criteria, based on fair, proportionate and non-discriminatory requirements for the processing of information that can be reused.

While the European Union's competence in this area is indeed limited mostly to the promotion of said market, from the internal perspective of each Member State they are being forced to consider the political dimension of public-sector transparency as an unavoidable democratic requirement.[3] Moreover, the accessibility to information held by public bodies is becoming a requirement of the "right to know," as well as

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[1] S.S. Dawes and H. Helbig, *Information Strategies for Open Government: Challenges and Prospects for Delivering Public Value from Government Transparency*, in M.A. Wimmer, J.L. Chappelet, M. Janssen, and H.J. School (eds.), *Proceedings of the 9th IFIP WG 8.5 International Conference on Electronic Government*, Berlin-Heidelberg-New York, Springer, 2011, 58, who highlight the fact that this dimension involves taking on new functions that require not only greater investments but, above all, new skills and knowledge for government staff, as well as innovative policies and changes in administrative procedures and practices.

[2] D. Osimo, *Benchmarking eGovernment in the Web 2.0 Era: What to Measure and ow*, in *European Journal of ePractice*, 4, 2008, 33-43.

[3] A.G. Orofino, *La transparenza oltre la crisi. Accesso informatizzazione e controlo civico*, Bari, Cacucci, 2020, 237-246.

an opportunity to perform better control by society. From the perspective of *open data*, both considerations are equally legitimate and can no longer be seen as mutually exclusive but rather as two reinforcing approaches.

However, the final consolidation of this approach does not simply call for administrative information to be accessible by electronic means.[4] Data should also be available under certain conditions: automated processing must be enabled and unjustified restrictions for reuse should be avoided, particularly without charge or, where appropriate, taking into account the marginal cost of dissemination. In this respect, Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the reuse of public-sector information (DRPSI) has been a major advance since, indirectly but significantly, implies document management to be carried out by public-sector entities according to the requirements of technological innovation.[5]

The evolution of the technological, social, and economic context itself demands a regulatory framework better adapted to the challenges faced by the European Union in a global scenario. As a reason for the necessary updating of the 2003 regulation, a clear reference was made to the adaptation of legal guarantees to the demands of competitiveness and innovation that arise from technologies such as Artificial Intelligence or the Internet of Things. Thus, the 2019 reform was intended to take a first step into the process of modernising the regulatory framework for open data and the reuse of public-sector information which is currently undergoing a major update within the so-called *European Data Strategy 2020*.[6]

Regarding the DRPSI, the main novelties include two new categories of data which regulation is certainly advanced: dynamic data, of great importance for Artificial Intelligence and smart cities, and high-value data, which can generate significant socio-economic and environmental impacts, boost innovative services, benefit many people or SMEs, as well as be combined with other data sets. In both cases, the European regulation is firmly committed to facilitating access to these data by establishing demanding conditions. It envisages making them available immediately after their collection, through appropriate APIs and, where suitable, enabling mass downloading. Even though the new regulation also stresses the importance of the principle of *open data by design and by default*, it does not imply that there is a clear obligation for public-sector bodies to make disproportionate efforts to adapt the information they hold following these formal requirements. Consequently, this lack of enforcement may be seen as a serious barrier regarding data availability for innovative purposes and digital transformation.

2. *Towards Data Spaces, a New Approach in the EU Legal Framework*

E-Government regulations have generally focused on document safeguards, without paying special attention to the relevance of data. Moreover, these rules are still mainly anchored in an *ad intra* view of document management despite the increasing importance of the *ad extra* dimension, especially since the consolidation of Open Government as one of the main axes of public policies.[7]

It is therefore not surprising that EU law has been the driving force behind a paradigm shift in regulation to a large extent. However, its key objective has not been so much to have a direct impact on the regulation of administrative activity but, on the contrary, to set the conditions for an EU-wide market for data, especially data generated by public bodies, with adequate safeguards for rights and freedoms. This purpose has now taken on a new significance, as digital context and technological innovation are largely based on

[4] Cf. B.S. Noveck, *Wiki Government. How technology can make government better, democracy stronger, and citizens more powerful,* Washington DC, Brookings Institution Press, 2009, 125.

[5] For an exhaustive analysis of this regulatory framework and the subsequent adaptation of Spanish legislation, see J. Valero Torrijos and R. Martínez Gutiérrez, (eds.), *Datos abiertos y reutilización de la información del sector público*, Granada, Comares, 2022.

[6] *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions* of 19 February 2020, COM(2020) 66 final.

[7] It is of great importance to insist on the need for a regulatory framework for administrative activity that would promote the demand for a data-driven orientation from the perspective of good regulation. On this idea, see D. Canals Ametller, *El acceso público a datos en un contexto de transparencia y buena regulación*, in D. Canals Ametller (ed.), *Datos. Protección, Transparencia y Buena Regulación*, Girona, Documenta Universitaria, 19-20.

the availability of enough and adequate data.[8]

Beyond the specific regulation on reuse and open data already referred to, the following pages will analyse the main milestones of the latest EU regulatory approach in this area - including the immediate future - and its potential impact on the regulation and practice of public-sector document management at a national level.

2.1. *The European Data Strategy*

The influence of the European Union in this area has been significantly strengthened with the *European Data Strategy*. This is a non-legislative document which main goal is for the EU to become a "role model of a society empowered by data to make better decisions, in business and the public sector." More precisely, it expresses the desire to "benefit from better use of data, including greater productivity and competitive markets, but also improvements in healthcare and well-being, environment, transparent governance, and convenient public services".

In terms of data availability, the *Strategy* no longer has its focus on data from the public sector, as it had been the case until now due to the prominence of the regulation on open data and its reuse, thus broadening the subjective perspective of its approach. Apart from exchanges between private parties, the need to optimise the collection of privately owned data by public bodies is raised to "improve evidence-driven policymaking and public services such as mobility management or enhancing the scope and timeliness of official statistics, and hence their relevance in the context of new societal developments".

Beyond the availability of data and, particularly, the technical conditions to ensure interoperability to facilitate the exchange, the *Strategy* poses two major challenges. On the one hand, it emphasises that "organisational approaches and structures (both public and private) that enable data-driven innovation on the basis of the existing legal framework are needed", from a cross-sectional perspective in particular. On the other hand, it highlights the importance of promoting a regulation that makes access to data more dynamic, not only in general terms of design and governance of relationships between private parties[9] but specifically in each of the data spaces.

2.2. *The Data Governance Act*

Unlike the 2019 DRPSI, *Regulation (EU) 2022/868 of the European Parliament and of the Council of 30 May 2022 on European data governance and amending Regulation (EU) 2018/1724* (DGA) set up a legal framework that will be directly applied across the European Union as of 24 September 2023. This is intended to harmonise the EU's internal market facing the risk of unilateral regulation by Member States fragmenting it if there is not a common discipline to help boost cross-border digital services.[10] However, it respects the competence of each Member State regarding the organisational measures to be adopted and their right to legislate access to public-sector information.

This is an important shift that is becoming more widespread because of the latest regulatory initiatives promoted by the European Union in the digital environment. It confronts the problems generated by directives which, as is well known, requires further transposition activity by Member States. This approach seems to be strengthened with most of the regulations planned in this and similar fields: the Artificial Intelligence proposal, the so-called *Data Act* and, more recently, the proposal about sectoral regulation on the healthcare data space. As mentioned above, the rules included in a EU Regulation are directly applicable. Consequently, those provisions of national legislation on the use of electronic media, transparency or reuse of public-sector information that are contrary to its provisions would be displaced and, likewise, the interpretation of these State laws must facilitate the effectiveness of the European regulation.

[8] This is a particularly relevant premise in the case of Artificial Intelligence, to the extent that it may even generate a new gap between public administrations and public entities depending on the more or less advanced level of digitisation. In this regard, see J. Miranzo Díaz, *Inteligencia artificial y contratación pública*, in I. Martín Delgado and J.A. Moreno Molina (ed.), *Administración electrónica, transparencia y contratación pública*, Madrid, Iustel, 2020, 128.

[9] This idea has led to the *Proposal for a Regulation on Harmonised Rules on Fair Access to and Use of Data* (*Data Act*) of 23 February 2022, COM(2022) 68 final.

[10] In any case, the implementation of this regulation may entail a bureaucratic and procedural complication, as has been accurately pointed out. On this issue, see S. Tranquilli, *Il nuovo citoyen européen nell'epoca del Data governance act*, in *Rivista di Digital Politics*, 1-2, 2022, 194.

Secondly, it is a regulation that, as regards the reuse of public-sector information, includes complementary provisions to the DRPSI.[11] It is based on the observation that there are still major difficulties in facilitating access regarding certain special categories of data. Thus, a new regulation is established (Article 3) for those sets of data over which there are third-party rights that hinder their reuse, such as the protection of personal data,[12] intellectual property or, among other legal interests, statistical or commercial confidentiality. The concurrence of these legal barriers can seriously hinder - and even prevent - the reuse of data of enormous value when implementing projects of great impact in the current social and technological context, such as those related to research and those based on the innovation required by digital transformation. In this respect, data-driven document management would address this challenge, so that instead of providing access to documents as a whole, it would be possible to limit access to only part of them and even provide them in a dissociated manner, i.e., without linking them to any subject, thus overcoming the drawbacks posed by accessing formalised documents.

Taking these objectives and challenges into consideration, the initiative aims to lay the foundations for building a European data governance model based on transparency and neutrality, as a counterbalance to the trends emerging from other geographical, political and economic spheres. It is specifically considered to establish a regulatory framework that reinforces the confidence of citizens, companies, and other organisations in the fact that their data will be reused under minimum legal standards, thus facilitating control over third parties' usage. DGA regulations promote measures that ensure, on the one hand, the lawfulness of the reuse of data for purposes other than its primary use specifically the impact on the data subject and, on the other hand, it contemplates adequate mechanisms for the protection of their legal position.

The main novelties of the regulation include the following:

- the obligation for public bodies that allow the reuse of this type of data affected by the rights and interests of third parties to adopt the technical, organisational, and legal measures that guarantee their effective protection (Article 5.5 DGA);
- the power granted to public bodies to impose reuse under certain conditions, by requiring data to be subjected to a "pre-processing" process that consists of anonymisation, pseudonymisation or, where appropriate, deletion of confidential information (Article 5(3)(a) DGA);
- it is foreseen that reuse may only be allowed in environments controlled directly by the public body (Article 5.3.b DGA);
- and, finally, public bodies are granted the power to prohibit the use of those results of data processing that endanger the rights and interests of third parties (Article 5.4 DGA).

In short, the measures implemented by the DGA provide solutions specifically aimed at tackling the conflicts arising from access to public-sector data that could affect the legal position of third parties, incorporating mechanisms that provide greater legal certainty and, therefore, reinforce the confidence of the holders of the aforementioned rights and interests. However, its effective implementation requires data accessibility to be considered from design and by default and therefore considering this requirement when choosing or designing the document management model. Otherwise, the necessary additional data processing to overcome the legal barriers may make access almost definitively difficult, especially regarding the economic conditions.[13]

[11] P. Dopazo Fraguío, *El nuevo Reglamento europeo para la gobernanza del dato: ¿liberalización segura de información y neutralidad de su tratamiento*, in *Revista Española de Derecho Europeo*, 82, 2022, 143, 160.

[12] This has traditionally been one of the main legal difficulties in facilitating access to administrative information for reusing purposes. On this tension, see H. Graux, *Open Government Data: Reconciling PSI Reuse Rights and Privacy Concerns*, in *European Public Sector Information Platform Topic Report*, 2011/3, and Article 29 Data Protection Working Party, *Opinion 06/2013 on open data and public sector information ('PSI') reuse*, of 5 June 2013.

[13] In this sense, one of the main challenges posed by the opening of data by public bodies to facilitate their reuse relates to how to finance the necessary transformation of the information prior to making it available to third parties in formats that allow its reuse in an automated manner. On the risks and difficulties of each option, see A. Sánchez García, *El valor económico de la información pública y la regulación del precio de su reutilización*, in J. Valero Torrijos and R. Martínez Gutiérrez (ed.), *Datos abiertos y reutilización de la información del sector público*, Granada, Comares, 2022, 226-232.

2.3. *Data Spaces: A Complex Ecosystem of Advanced Document Management*

As mentioned above, the *European Data Strategy* envisages the launch of a series of data spaces to promote added-value services and products based on technological innovation. Although there is no general regulation, they are considered ecosystems where data from the public sector, companies and individuals, as well as research institutions and other types of organisations are available and exchanged reliably and securely.[14]

These spaces aim to promote scenarios where the voluntary sharing of participants' data can be implemented within an environment of sovereignty, trust, and security, through integrated governance, organisational, regulatory, and technical mechanisms.[15] Such spaces will allow participants to take on diverse roles, whether as data producers, data consumers, data service providers, component developers or operators of essential services.[16]

As far as public bodies are concerned, their position would be comparable to that of any private subject if they use the data or provide data-based services under the same conditions. However, these entities are above all called upon to play a key role from two points of view. Firstly, the public sector will often be the promoter or oversee the governance of the space, setting the conditions for all participants and, if necessary, enforcing them; so that if a public body provides its data and uses the data provided by others, the two roles should be separated into two different entities, to ensure the neutrality of the decisions to be taken.

Secondly, public-sector bodies have a particularly active role to play in the implementation of the legal provisions on reuse and open data as data spaces can be fed by the information they provide and by high-value data. That is, data must be made available by public entities under certain standards, namely: a machine-readable format, through APIs and, where appropriate, downloadable by bulk. These requirements oblige, on the one hand, to adopt technical, organisational, and legal measures to allow access to the data following them and, on the other hand, to make the data available from a single point of access regardless of whether the administrative competences in the respective field are spread over different territorial levels or are held by different entities. Consequently, the fragmentation of competences inherent to a decentralised State may involve a major barrier to the processing of data that, however, should not imply the need to resort to different data sources. On the contrary, integrated systems should be implemented *ad intra* based on inter-administrative relations according to interoperability requirements, so that access would be enabled through a single and integrated point.

These spaces represent an emerging model of public-private collaboration[17] but, even though there are already important initiatives underway, they currently lack a minimum of general regulation at EU level that could help us understand their scope. Nevertheless, as far as the subject of this paper is concerned, it is at least possible to draw some initial remarks that are useful when it comes to pointing out the consequences for document management in the public sector.

Data spaces involve a prominent role for public entities and demand a higher degree of integration with other subjects as well, particularly in the private sector. Consequently, an additional interoperability effort is required both from a technical/organisational perspective and a legal one; a requirement of great relevance as regards the conditions of access to information and the conditions of its reuse, since the diversity in the origin of the data also implies the heterogeneity in the applicable regulation. Even more, unless a clear legal provision is stablished, it would not be appropriate to impose certain conditions unilaterally and therefore, transparent, and participatory management models should be sought. In the end, a legal approach limited only to eGovernment, open data and reuse of

[14] European Commission, *Commission Staff Working Document on Common European Data Spaces*, 2022, 4.
[15] C. Alonso Peña, *Espacios de datos: visión conceptual y características*, *Boletic*, 91, 2022, 28.
[16] C. Alonso Peña, *Espacios de datos: visión conceptual y características*, 30.

[17] Although "cultivating engaging relationship with the public is challenging for government organizations, the negative consequences of government isolation from citizens are enormous" (VvAa., *Building Digital Government Strategies. Principles and Practices*, Cham, Springer, 2017, 110). This risk is particularly intense in digital scenarios, where complexity demands deeper co-operation with private entities.

information regulations, which are primarily designed for the public sector, would therefore not be enough.

2.4. *The Forthcoming European Regulation on the Health Data Space as an Example of the Need for a New Model of Governance*

One of the essential tools of the *European Data Strategy* refers to the creation of common and interoperable data spaces in strategic sectors at EU level, to overcome the legal, organisational, and technical obstacles to data sharing in specific areas of relevance. To this end, the *Strategy* envisaged a series of regulatory initiatives which, on the one hand, have materialised in the horizontal measures established in the DGA and, on the other hand, in the promotion of data spaces. In this respect, the Strategy provided for the possibility to complement this general regulation with sector-specific provisions on access to and use of data, as well as mechanisms to ensure interoperability.

Data access and exchange demand a more accurate approach that reflects the specificities of each field and the difficulties and challenges to be addressed. Considering the general regulatory framework referred to above, the Commission has presented a draft regulation on the European Health Data Space.[18] This initiative aims to boost data accessibility for primary uses, i.e., the provision of healthcare, while seeking to establish adequate conditions for secondary uses to promote new digital and innovative healthcare services and products. To this end, a unique governance model of its own, with a specific body at the helm is envisaged, the European *Health Data Space Board*, as well as the deployment of duly coordinated Member States administrative structures in charge of facilitating access to data.

In terms of the reuse of data for purposes other than healthcare, the proposed Regulation is based on the following evidence which, raises a general problem in many public entities: even though health data are already being collected and processed using electronic means, access to them is not always facilitated to fulfil other purposes of general interest.[19] With that in mind, the Regulation intends to promote a broad regulation that enables, among other purposes, the preparation of statistics, the development of training and research activities, such as technological innovation -including training of algorithms- or personalised medicine.

Regarding the parties obliged to share data, the proposed regulation applies to those who collect and process data with public funding, who must make them available to the competent bodies to facilitate their reuse. However, given their importance in some Member States, the regulation also extends its scope to private bodies providing healthcare services - unless they are micro-companies - and even to professional associations.

The regulation is based on a general rule: access to anonymised data to reduce privacy risks, although a specific regime is also envisaged for personal data. In this case, the request must include an adequate justification and the data will only be provided in pseudonymised form. Regarding access, the sensitivity of health data provides that they should be made available through a secure processing environment that complies with certain technical and security standards. In particular, the proposal does not allow data to be transmitted directly to the entity that will reuse them, except for non-personal data. Furthermore, it provides for processing to be carried out in secure environments under the control of access authorities.

From the perspective of the governance model underpinning the proposal, Member States should have at least one health data access body to provide electronic access for secondary purposes. In the case of several bodies due to requirements arising from their political-administrative organisation, one of them will exercise coordinating functions. Beyond the organisational freedom of the States to choose one or another formula, the independence of the coordinating body must be guaranteed, without prejudice to the mechanisms of financial or judicial control. In this respect, it is proposed that these bodies should be given the powers to verify compliance with these rules and to impose sanctions and other measures such as

[18] Proposal for a *Regulation of the European Parliament and of the Council on the European Health Data Space* of 3 May 2022, COM (2022) 197 final.

[19] However, disagreement has been expressed with the negative impact that the proposal could have by intensifying the fragmentation of the regulation given the numerous references it contains to the rules of the States. In this respect, see S. Navas Navarro, *Datos sanitarios electrónicos. El espacio europeo de datos sanitarios*, Madrid, Reus, 2023, 227, 228.

temporary or permanent exclusion from the European Health Data Space of those who do not fulfill their obligations.

The harmonisation sought by the proposed Regulation is also envisaged in the establishment of a standardised procedure for the issuing of permissions to reuse data. In cases where anonymised access to data is not enough, the applicant will have to justify why pseudonymised access is necessary. In the latter case, the request should specify the legal basis for requesting access to the data from a data protection perspective, the secondary purposes for which the data are intended to be reused, as well as a description of the data and tools necessary for their processing.

Finally, the proposal includes active publicity obligations addressed to the aforementioned bodies regarding the available datasets. This is an essential provision, since the existence of a catalogue of datasets at the European level - based on the interconnection of national datasets - would be extremely useful for promoting not only research and innovation but also decision-making at a regulatory, political and management level. For each set of available data specifically, the nature of the data, its source, and the requirements for making the data available shall be indicated.

The main purpose of this initiative is to ensure a uniform and consistent application of the regulatory framework for health data access for secondary purposes throughout the European Union, particularly regarding the protection of personal data. However, beyond the singularities in this field, this is an example that shows that document management of healthcare institutions – particularly public ones, in the case of the object of our work - must undergo a profound renewal, taking on the challenge that data can not only be used for healthcare purposes but be provided to third parties as well. It requires the adoption of management guidelines and criteria based on data and, specifically, on facilitating access to them from the design and by default requirements. Therefore, the mere digitalisation of documents is not enough and, for this reason, the limitations inherent in the regulation on e-Government, open data and reuse of public sector information should be overcome.

3. *The Challenges Ahead*

The approach of eGovernment regulation in the field of document management has been frequently characterised by a twofold perspective: on the one hand, by an outstanding and almost exclusive orientation towards documents and their mere digitisation and, on the other hand, by the almost irrelevant role that data have been playing, except for the latest reforms promoted by the European Union and, also, by the growing prominence of Open Government.

Consequently, these premises have substantially conditioned not only administrative practices but also the debate on the necessary adaptation of legal guarantees to the singularities of technological innovation.[20] This problem has become evident in recent times with the need for a management model based substantially on data, both in terms of better compliance with regulatory obligations and, given the need to have sufficient data, to meet the demands of technological innovation for the exercise of public functions, especially regarding Artificial Intelligence and, in general, the automation of administrative activity.

The commitment to an advanced and proactive model of document management in the public sector that faces those obstacles must be perceived as a strategic necessity that goes beyond mere compliance with current legal provisions. It is a challenge that must necessarily be addressed proactively, by design and by default, that is, using standards and approaches that allow the automated management of data without the need for additional processing, both in terms of their internal use for the exercise of public functions and, above all, from the perspective of their openness and reuse. Otherwise, it will not be possible to comply with the regulatory obligations in an efficient way and, more worryingly, it will not ensure adequate guarantees regarding the technical and legal conditions under which data must be kept, managed, and opened.

Moreover, the current complexity of digital environments determines that data generated

[20] It is therefore essential to adopt an approach based on services rather than on procedure, as suggested by I. Martín Delgado, *El acceso electrónico a los servicios públicos: hacia un modelo de Administración digital auténticamente innovador*, in T. De la Quadra Salcedo and J.L. Piñar Mañas (eds.), *Sociedad digital y Derecho*, Madrid, BOE-Red.es, 2018, 187-190.

by public-sector bodies must be integrated with data from other private sources, which requires an additional effort when establishing the conditions under which interoperability will take place, which can no longer be unilaterally defined by the public sector. Private entities are also called upon to play a relevant role, not only by facilitating access to their own data but, above all, by providing intermediation services with an unquestionable added value.[21] Consequently, it is necessary to promote alternative models that are legally adapted to the demands and singularities of digital and innovative ecosystems. In short, to go beyond regulatory obligations and assume advanced governance models[22] where data play the leading role they are entitled to.

[21] In the end, there is a clear need "for a coherent advancement of the regulatory framework with regard to data intermediaries, which would eventually contribute to an effective market design on data sharing" (H. Richter, *Looking at the Data Governance Act and Beyond: How to Better Integrate Data Intermediaries in the Market Order for Data Sharing*, in *GRUR International*, 72(5), 2023, 470). Moreover, intermediaries are even called upon to play an important role in the effectiveness of legal guarantees (M. von Grafenstein, *Reconciling Conflicting Interests in Data through Data Governance*, in *HIIG Discussion Paper Series*, 2022-02, 37), which again leads to the growing significance of governance models over and above regulation itself.

[22] On the scope of this concept from the perspective of data in the Spanish public sector, C. Ramió, *La década de la innovación en la gestión pública en España: una agenda para 2030*, in C. Ramió (ed.), *Repensando la Administración digital y la innovación pública*, Madrid, Instituto Nacional de Administración Pública, 2021, 62-64.