

Data Access Maturity Assessment

Please select exactly one answer per question. Select the option that best describes your current situation today, not the situation you are working toward.

Dimension 5 — Data Access

Definition*: How well defined and implemented your data access processes are, from a legal, ethical, and technical perspective. Under the EHDS, a Health Data Access Body (HDAB) will forward data requests to you; this dimension asks how ready you are to handle them.

1. When somebody asks for your data, what happens?*

- ☐ There is no process. Requests are handled case by case, by whoever is asked. 1 pt.
- ☐ There is a written process, but responses are neither timely nor consistent, with no agreed response time and varying outcomes. 2 pts.
- ☐ Responses are timely and consistent: an agreed response time, a named responsible person, and the same route every time. 3 pts.
- ☐ The process covers the technical and the legal side, with tracked service levels, for example, "90% answered within 30 days." 4 pts.
- ☐ A complete access system covering technical, legal, and ethical review, aligned with EU rules and reviewed regularly. 5 pts.

You can support this answer with: your data access policy, the request log for the last 12 months.

2. How timely and consistent are your responses?*

- ☐ No defined response time. The outcome depends on who handles the request. 1 pt.
- ☐ We aim to respond promptly, but nothing is agreed or written down. 2 pts.
- ☐ A target response time is agreed and written down, but we do not measure whether we meet it. 3 pts.
- ☐ We measure our response times against the target and meet it in most cases. 4 pts.
- ☐ Response times are measured, published, and consistently met; decisions follow documented criteria. 5 pts.

You can support this answer with: your request log with dates received and answered, service-level report.

3. What does your access process cover?*

- ☐ Nothing is in place. 1 pt.
- ☐ The technical route only, so we can extract and send data. 2 pts.
- ☐ Technical route, plus a legal basis and a data sharing agreement. 3 pts.
- ☐ The above, plus a documented decision procedure with defined approval criteria. 4 pts.
- ☐ The above, plus an ethical review step. 5 pts.

You can support this answer with: your access procedure, template data sharing agreement, ethics review route.

4. How does your access process relate to EU rules?*

- ☐ We have not assessed it against EU rules. 1 pt.
- ☐ We are aware of GDPR obligations and apply them informally. 2 pts.
- ☐ GDPR compliance is documented for data sharing. 3 pts.
- ☐ GDPR compliance is documented, and we have mapped our process against the EHDS Regulation. 4 pts.
- ☐ Our process is aligned with the EHDS Regulation and is reviewed as implementing acts appear. 5 pts.

You can support this answer with: your records of processing, DPIA, EHDS gap analysis.

5. Can potential users find out what you hold and how to ask for it?*

- ☐ No. They would have to know somebody here. 1 pt.
- ☐ They can ask us, and we will tell them. 2 pts.
- ☐ Our datasets and access conditions are described in a standard document, supplied on request. 3 pts.
- ☐ Datasets and access conditions are published on our website or in a catalog. 4 pts.
- ☐ Published in a machine-readable catalog, ready for the national EHDS dataset catalog. 5 pts.

You can support this answer with: your public dataset list or catalog entry.

YOUR NOTES FOR THIS DIMENSION

What sits behind these answers: the practices and tools you rely on, recent improvements, and the gaps that explain the lower scores. This is the material for the supporting narrative on the Overall Score sheet.

DIMENSION SCORE

Add up the points of all 5 answers and divide by 5. Keep one decimal.

YOUR MATURITY LEVEL

Round the dimension score down to the nearest whole number.

Level 1 Initial Starting out · 1 Point	Level 2 Emerging Written down · 2 Points	Level 3 Defined In practice · 3 Points	Level 4 Managed Measured · 4 Points	Level 5 Optimized Improving · 5 Points
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The five maturity levels in this dimension

Your five answers average to one level. Each row describes what that level typically looks like across all five questions, so you may be ahead of it on some points and behind on others.

Level 1 Initial	No process, no response time, no legal assessment, and nobody can find out what you hold.
Level 2 Emerging	A written route exists, but responses are unpredictable and only GDPR is applied informally.
Level 3 Defined	Agreed response time and named owner; legal basis and sharing agreement; described on request.
Level 4 Managed	Response times measured and met; documented approval criteria; EHDS mapped; datasets published.
Level 5 Optimized	Ethics review included, aligned with EU rules and reviewed; machine-readable dataset catalog.

Your next step: find the row for the level you reached, then read the row directly below it. That row is what you need to achieve to move up one level in this dimension.

Note: Every question in this dimension uses the same 1–5 scale, and the same real-world situation is worth the same number of points in every question, so both the lowest and the highest level are reachable. Transfer your maturity level for this dimension to the *Maturity Overall Score Calculation* sheet, which brings all ten dimensions together.

References*

Question 1 follows the maturity levels of this dimension in the QUANTUM data holders' maturity model (Deliverable 1.2 v3.5); the wording is EHDS4ALL's own. Underlying source given there for this dimension: European Health Data Space / FAIR. Questions 2 to 5 are EHDS4ALL, developed from the WP3 workshop of August 2024 and the expert interviews of October 2024. The five level statements below combine all five questions, because the dimension score is the average of all five answers.

Jones, M., & Bernal-Delgado, E. (2025). **Deliverable 1.2 — Specification for the assessment of data holders' maturity** (Version 3.5.0). QUANTUM project. Zenodo. doi: 10.5281/zenodo.14944767

European Commission. (2022). Proposal for a Regulation of the European Parliament and of the Council on the European Health Data Space. COM(2022) 197 final. Adopted as Regulation (EU) 2025/327.

Wilkinson, M. D., Dumontier, M., Aalbersberg, I. J., et al. (2016). The FAIR Guiding Principles for scientific data management and stewardship. *Scientific Data*, 3, 160018.

EHDS4ALL (2024). Protocol, Workshop Kick-off WP3, Cologne, 19 August 2024. Work Package 3, dimension validation and maturity levels.

EHDS4ALL (2024). Expert interviews with health data holders and maturity model developers, October 2024. Conducted by inav and the University of Cologne; participants anonymized.