

Access to and quality of public data on EU fund allocations targeted at municipalities in Hungary

Government transparency, open and digital government reforms have dominated the public agenda in many EU countries for the last decade. On the one hand, international organisations (the European Union, Open Government Partnership, OECD, and the World Bank) are the key drivers for open government data initiatives by defining the concept of open data and by identifying and assessing good national practices of public disclosure.¹ On the other hand, some OECD and EU Member States are leading pioneers in improving the accessibility, the quality and the re-use of public data (e.g., Austria, Ireland, Korea, Poland, Slovenia, and Spain).²

It is generally suggested that opening public data may strengthen responsible public governance, boost trust in public institutions, and foster public accountability by reinforcing the obligations of public governments to respect the rule of law and to improve decision-making and administrative processes within the public sector.

The expected benefits of improving the access to and the quality of government data could be crucial in the case of EU cohesion policy and especially in the new EU Member States for two reasons. First, the European Investment and Structural Funds (hereinafter referred to as EU funds) represent a substantial share in public investment. For example, in Hungary the EU cohesion policy is the main public investment policy driver by having been provided funds equivalent to 55.46 per cent of government capital investment over the period 2015-2017.³ Second, the actual size and socially efficient use of the geographically targeted EU transfers is gaining importance in countries where the (post) Covid-19 crisis measures pose effective fiscal constraints to public governments (especially, to local governments) and where the relatively lower quality of public institutions can make the use of EU funds especially subject to political favouritism and consequently, to misallocation.⁴

In this brief we focus on a cross section of the use of EU funds and access to high-quality public data. We run our quick assessment on compliance with open data standards while keeping our eye on the Hungarian municipalities and on the EU funds allocated to these municipalities. This exercise is linked to our project commissioned by the Hungarian Helsinki Committee and exploring the types of political favouritism and the possible, data-driven avenues to quantify the effects of political favouritism in the EU fund allocations following the local elections in October 2019 in Hungary.⁵

¹ For the key policy goals, benefits, good practices and recommendations on open government and as part of it on improving access to public data, see the following open government and data portals: Open Government Partnership - <https://www.opengovpartnership.org>, OECD - <https://www.oecd.org/gov/open-government/>, the World Bank open data portal: <https://data.worldbank.org>, including its open DataBank: <https://databank.worldbank.org/databases>

² See, these countries among the top15 in the Open Government Data Index Rank published by the OECD in 2020, as accessed on 2 March 2022: <https://www.oecd.org/gov/digital-government/ourdata-index-policy-paper-2020.pdf>. Notably, data for 2017 and 2019 were not available for Hungary in the OECD's Open Government Data Survey.

³ Data exported from EU Cohesion data portal, <https://cohesiondata.ec.europa.eu/Other/-of-cohesion-policy-funding-in-public-investment-p/7bw6-2dw3> (Accessed 2 March 2022).

⁴ For a comprehensive literature review on corruption risks and exposure to political favouritism in the field of EU cohesion policy transfers, see Budapest Institute 2022. Local governments and types of political favouritism – theoretical approaches, empirical evidence, and plan for an empirical analysis in Hungary. http://budapestinstitute.eu/index.php/projects/datasheet/political_favouritism_and_local_governments/en

⁵ While the project was commissioned by the Hungarian Helsinki Committee, it was financed by a grant from the Foundation Open Society Institute in cooperation with the OSIFE of the Open Society Foundations, and by a grant from the Swedish Postcode Foundation. For more information, consult our homepage: http://budapestinstitute.eu/index.php/projects/datasheet/political_favouritism_and_local_governments/en

First, we review the open data policy framework in the European Union and in Hungary. Then we take account of the key Hungarian data sources relevant for the analysis of the use of EU funds by Hungarian municipalities and assess the quality of these government data based on international open data standards. Finally, we close our paper with some policy recommendations.

1. EU open data policy and open cohesion data

The EU Open Data Directive⁶ regulates European open data policies and the re-use of public sector information across the EU Member States. The key EU policy objectives of this framework regulation are to set minimum criteria for governments to share information and data produced within the public sector for re-use by private and public entities and to reap the full potential of open data re-use. In accordance with the European Digital Strategy⁷ and its priority of digitisation of public services, the European Commission also encourages best practices and strives to lead by example in providing also access to data on the progress of the EU cohesion policy.

For example, at the EU level a comprehensive data portal (<https://cohesiondata.ec.europa.eu>) was set up in 2020 that provides access to EU co-financed fund allocations at two levels of aggregation (country- and EU region-level) and breaks down data by the different funding sources, policy objectives, and implementation phases.⁸ More recently, in March 2022 the European Commission has launched a new public platform called *Kohesio* (<https://kohesio.ec.europa.eu>) which shares project- and beneficiary-level data on EU allocations distributed by the Member States in the period between 2014 and 2020. Both EU data portals provide properly standardised data with advanced data export options (in machine-readable formats⁹), strive to enhance the user-experience with various data visualisation tools and interactive solutions (see, interactive graphs and maps), and easy-to-understand filter options.

Notably, publication of administrative data on EU co-financed development programmes and projects is an obligation of the European Union as well as the fund-redistributing national authorities at the Member States level. It is expected that publication of data on the EU fund allocations will improve implementation, enhance assessment of the programme outcomes and lead to development policies better meeting the socio-economic needs of its target groups. Open public data is also the necessary (though not sufficient) entry point for civil participation and better-informed civil engagement in shaping the government decisions linked to the use of EU funds.

The framework regulation on the allocation of EU funds for the period 2014-2021 (EU Directive 1303/2013) prescribes timely publication of basic fiscal data on the progress of implementation (Art 99) and it defines provisions on how programme administrative data should be recorded and stored in a computerised form within the management and monitoring systems established by the national authorities in charge of the allocation of EU funds (Art 123, 127).¹⁰ The key policy ideas here are that the national authorities must ensure transparency of the programme implementation by giving access to monitoring data on the supported project applications and per EU fund types in a structured format.

⁶ Directive (EU) 2019/2024 of the European Parliament and of the Council, <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019L1024&from=EN>

⁷ For more, see <https://digital-strategy.ec.europa.eu/en/policies>

⁸ Notably, municipality- and or geographically identifiable project-level data is not available.

⁹ That means, in a format which is appropriate for automated analysis and re-use (ideally, .csv- or .xlsx-formats), see: <https://kohesio.ec.europa.eu/services>. For the Hungarian project-level dataset, contact: <https://kohesio.ec.europa.eu/data/projects/>

¹⁰ See, Directive (EU) 1303/2013 of the European Parliament and of the Council, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32013R1303>

There is also an explicit emphasis on the easy search and sorting functions and on online extraction (Art. 115(2)).¹¹ For example, Portugal has just launched the so-called Transparency Portal, an online portal that shares data on measures, projects financed or co-financed by EU funds in real-time. The data can be automatically extracted in machine-readable format.¹²

As per EU standards, it is also the obligation of the Member States to submit annual implementation reports (Art. 50) to the European Commission on the implementation of the operational programmes in the previous financial year and to make these reports along with so-called citizen summaries of its content available to the public (Art. 50(9)).¹³

2. Open data policy framework and practices in Hungary

As an EU Member State, Hungary is obliged to transpose the EU Open Data Directive into its national regulation as well as to harmonise its own national regulations on the use of EU funds with the common European provisions. While specific law is in effect on the reuse of public sector information (Act LXII/2012)¹⁴ and on the national data assets (Act XCI/2021)¹⁵, Hungary has not yet notified the European Commission about the complete transposition of the Open Data Directive. Consequently, an EU infringement procedure (INFR(2021)0434) was launched in December 2021 and is still in progress.¹⁶

According to our own experiences and based on the opinion of two independent Hungarian experts interviewed, while the national digital government strategy and the corresponding government agencies are in place¹⁷, the overall open data policy framework in Hungary is still evolving. The implementation is weak – for example, gaining access to data owned and managed by public hosts might be extremely time-consuming for both researchers and the media. Most importantly, the data quality is often very problematic and the linking of various public datasets (a key first step towards quantifying effects of EU transfers in a statistically robust way) might be especially challenging due to inconsistencies in and lack of specific technical provisions in the current legal framework.¹⁸

¹¹ Ibid.

¹² See, <https://transparencia.gov.pt>

¹³ In order to encourage the reuse of the published data subsequently by non-government actors (incl. both private or civil stakeholders) the government website or portal shall clearly indicate the applicable licensing rules under which data are published.

¹⁴ See, 2012. évi LXIII. törvény a közadatok újrhasznosításáról (Közzadatok tv.), <https://njt.hu/jogszabaly/2012-63-00-00>

¹⁵ See, 2021. évi XCI. törvény a nemzeti adatvagyonról (Nadt.), <https://njt.hu/jogszabaly/2021-91-00-00>

¹⁶ https://ec.europa.eu/atwork/applying-eu-law/infringements-proceedings/infringement_decisions/index.cfm?lang_code=EN&typeOfSearch=true&active_only=0&noncom=0&r_dossier=&decision_date_from=01%252F03%252F2010&decision_date_to=16%252F03%252F2018&EM=HU&title=&submit=Searc
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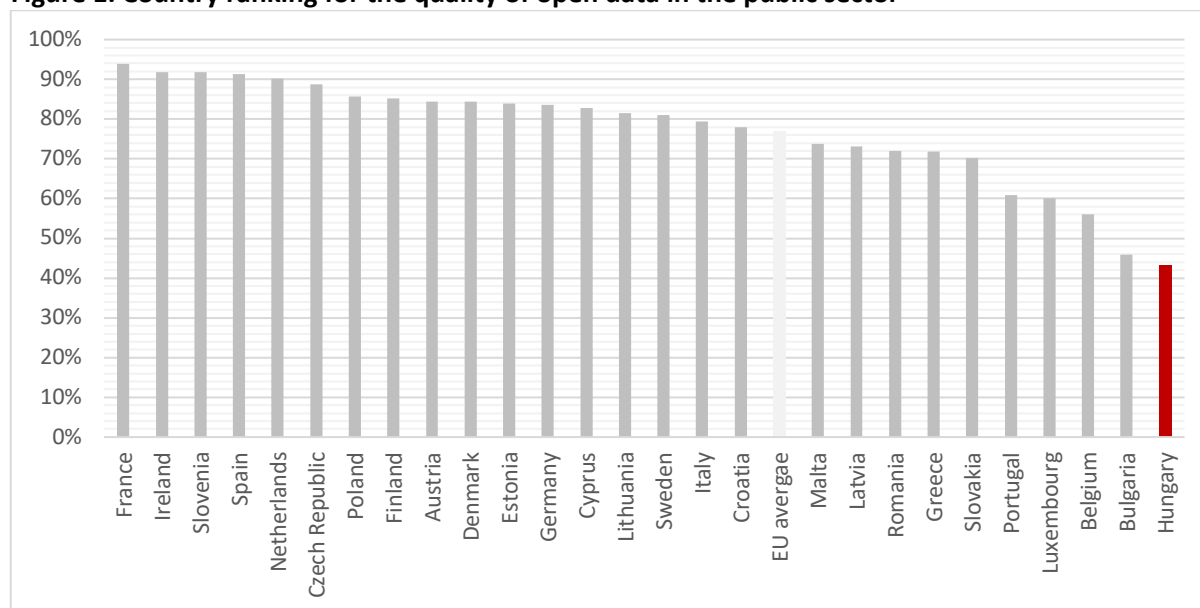
¹⁷ The Digital Success Programme was launched by the Hungarian Government in 2015. It aims to build a comprehensive digital ecosystem in Hungary by boosting digitalisation processes both in the public and private sector. It encompasses specific sub-programmes targeting the educational sector, start-ups and export-oriented Hungarian companies. Two government institutions are in charge of implementing the digitalisation strategies (*Neumann János Nonprofit Kft.*, <https://neum.hu>) and of coordinating and managing the open data policies (National Data Asset Agency, *Nemzeti Adatvagyon Ügynökség*, <https://www.navu.hu>).

¹⁸ For more, see <https://hirlevel.egov.hu/2021/11/06/epulo-nemzeti-adat-okosizsistema-eloadasok-es-kerekasztal-beszelgetes-a-magyar-szinpadon-infoter-konferencia-2021-oktober-20/>. In addition, it should also be noted that civil society organisations, media actors face also severe challenges while trying to access public sector information and generally requesting access to public information via standard public information requests – despite the provisions of the Freedom of Information Act (CXII/2011) in effect since 2011. The several amendments to the FoI Act over the last decade do not paved the way to easier and quicker access – for more on the challenges faced by non-government stakeholders, see https://helsinki.hu/wp-content/uploads/2021/03/HUN_NGO_contribution_EC_RoL_Report_2021.pdf, and https://helsinki.hu/en/wp-content/uploads/sites/2/2022/01/HUN_NGO_contribution_EC_RoL_Report_2022.pdf.

This mixed overall picture is also clearly reflected in the European assessment on the Hungarian open data policies and practices. According to the most recent Open Data Maturity Report published by the European Commission in 2021, Hungary is classified as ‘Beginner’ among the EU Member States regarding its open data policies and practices.

Hungary scores 54% out of the maximum 100% in the open data maturity index – as opposed to the EU average score of 81%. The below-the-average overall country score is, however, the result of three low scores out of the four sub-scores – namely, the sub-score in government data quality (42%, the worst performer in this dimension across the EU, see Figure 1.), in data impact (49%), and due to the less user-friendly features and low transparency of government data portals (59%). Notably, Hungary catches up with the EU average only in the open data policy dimension (cf. 79%).¹⁹

Figure 1. Country ranking for the quality of open data in the public sector



Source: Open Data Maturity Report 2021,

https://data.europa.eu/sites/default/files/landscaping_insight_report_n7_2021.pdf

Regarding more progressive open data approaches in the public sector, the National Open Data Strategy from Poland could be an inspiring example for Hungary. In Poland, the Ministry of Digital Affairs launched the first national strategy in 2016 and has just recently developed a new one, called Open Data Programme 2021-2027. It has four priorities: i) increasing access to high-value datasets published on the national open data portal, ii) increasing re-use and exchange of data by enhancing data quality, iii) offering open data related education and training to a multiple set of national stakeholders, and iv) consolidating a network of open data officers across the public sector.²⁰

3. Quick assessment of open data sources relevant for the analysis of the use of EU funds

If we check Hungary’s compliance with the EU provisions on sharing information and data with the broader public, on the progress of the implementation of the EU co-financed development programmes and on the allocation of EU funds, we find that Hungary complies only partly with the EU

¹⁹ For more details, see Open Data Maturity Report 2021: https://data.europa.eu/sites/default/files/landscaping_insight_report_n7_2021.pdf
²⁰ For more, see <https://dane.gov.pl/pl/article/1281,nowy-program-otwierania-danych-na-lata-2021-2027>.

provisions. For example, actual statistics on the progress of fund allocations is available at the respective government portal (www.palyazat.gov.hu), but this publicly available data is available only at data aggregated at programme- and measure-level.²¹ In addition, the Hungarian authorities fail to comply with the common provision on publishing the annual implementation reports submitted to the European Commission. Neither these reports, nor the so-called citizen summaries of the content of these progress reports are publicly available on the central government portal.

Regarding the quality of public data and datasets relevant for a meaningful statistical analysis on the targeting and effectiveness of EU fund allocations, we suggest applying international data quality standards for the quick assessment. For example, the International Open Data Charter (ODC) defines open data as “digital data that is made available with the technical and legal features necessary for it to be freely used, re-used, and redistributed by anyone, anytime, anywhere”.²²

In partnership with governments, civil society, and experts from across the globe, in 2015 the ODC developed six principles on how to publish government data. The ODC principles are fairly reflected both by the OECD and by the European Commission in their open data assessments. Consequently, we choose the ODC principles to cross check and to assess the publicly available government datasets relevant to our inquiry on the use of EU funds by Hungarian municipalities.

The ODC recommends that public data should be:²³

1. **Open by default:** It presumes publication of all government data, or alternatively, it requires that if public data is kept closed, public governments need to justify it. At the same time, governments should guarantee that open data will not compromise privacy rights.
2. **Timely:** Publication is on time, not delayed beyond reasonable time span.
3. **Comprehensive:** The publicly available government datasets are comprehensive, accurate, and of high quality. Data is provided in its original, unmodified form.
4. **Accessible and usable:** Data hosts do everything to ease data user-experience and make the data discoverable for the widest range of users. That means, i) access to government data is not time-consuming, it may require only few clicks to find them (see, use of flags/markers, easy-to-find entry points on the portals or homepages), ii) data is machine-readable (published in multiple or multifunctional file formats, ideally in .csv-format), and iii) access is free of charge (preferably, under open licence (of Creative Commons²⁴) or access pricing is clear and reasonable.
5. **Comparable & interoperable:** Data is comparable between and within sectors, across geographic locations, and over time. Use of common identifiers and of consistent metadata is key to support data linking.
6. **Improved governance and encouraging citizen engagement:** Public data hosts and managers do engage and consult with the potential data users (citizens, civil society organisations, business sector organisations) on a regular basis and in a transparent way. Official documentation accompanying data is written in clear, plain language, and data users have sufficient information to understand the source, the substantial content, and the analytical limitations of the specific dataset. Public authorities also aim to improve data prioritisation, release (by finding out non-government preferences on data of high demand) and develop their data standardisation practices.

²¹ See, the menu point ‘Actual Statistics’ (*Aktuális statisztikák*): <https://www.palyazat.gov.hu/aktstat?lang=hu>

²² ODC (2015): International Open Data Charter, p.1, downloaded on 13 March 2022: https://opendatacharter.net/wp-content/uploads/2015/10/opendatacharter-charter_F.pdf

²³ ODC (2022): Open Data Charter – Principles. <https://opendatacharter.net/principles/>

²⁴ For general information on Creative Commons licenses, see: <https://creativecommons.org/licenses/>; for the specific types of CC-licenses, consult: <https://creativecommons.org/about/cclicenses/>

Good practices here show that for example providing training programmes, tools, guidelines for both government and non-government stakeholders, running regular consultations with open data community (see, civil society or business organisations, watchdogs engaged with freedom of information/access to information, and/or with reuse of public data) could contribute to better data quality and interoperability. In the Czech Republic, for example, a government working group consisting of 14 open data coordinators from ministries and public bodies, consults open data policies, reflects on the institutional practices, and provides open data training for civil servants.²⁵

7. **Inclusive development and innovation:** Data hosts play a pro-active role in promoting the effective and innovative reuse of government data in order to maximise the impact and unlock the value of open data.

Good practices here include: public-private/civil partnerships in development or co-creation of datasets, data visualisations/applications, and other tools based on open data; engagement with actors in public education to support open data research and to improve data literacy (making it part of the educational curricula), capacity-building and sharing technical expertise and experience between government and non-government stakeholders as well as within the public sector.

In what follows, based on these open data principles and international recommendations we assessed the Hungarian datasets relevant to our analysis on EU funds. We conducted three interviews with independent researchers and experts from Hungary who have been working with these datasets or are knowledgeable on the legal and practical challenges in the Hungarian data policy. We analysed and structured the conclusions from the expert interviews along with reliance on our own data user experiences within the framework of an expert workshop organised within the Budapest Institute. The outcomes of our assessment are summarised in the Table below.

Table 1. Compliance of public datasets relevant for analysing the use of EU funds with the ODC principles

	Relevant Hungarian datasets		
ODC principles on publication of government data	Administrative data on EU funds (application-level)	Local election data	Municipality-specific socio-economic data
Data host and reference to the corresponding public dataset	Prime Minister's Office – <i>EMIR</i>	National Election Office – <i>Helyi önkormányzati választások adata</i>	National Statistical Office – <i>T-Star</i>
Open by default			
Timely			
Comprehensive			
Accessible & usable			
Comparable & interoperable			
Improved governance, citizen engagement			
Inclusive development, innovation			

Legend: green – good, yellow – to be improved, red – not complying

Source: own contribution.

²⁵ See, <https://www.vlada.cz/en/ppov/rvis/government-council-for-information-society-74186/>.

Application-level, administrative data on EU funds – EMIR database

Prime Minister's Office (*Miniszterelnöki Hivatal*) – EMIR (*Egységes Monitoring és Irányítási Rendszer*, Integrated Monitoring and Controlling System): Administrative data on projects benefiting from EU funds is available at the government central portal managed by the Prime Minister's Office (www.palyazat.gov.hu). Administrative details on the supported projects or applications are accessible from the Project Finder application clearly visible on the opening page (*Támogatott Projektkereső*).²⁶ Data is updated on a weekly basis, structured systematically and consistently across operational programmes, measures and implementation period, but it is not comprehensive, it fails to provide access to the full set of application-level information (e.g., data in some categories, for example, project outputs, sum of last payments, are registered but not published on the public website). In addition, publication is also missing on failed project applications (neither at application-, nor at any higher, aggregated level), and, while the existence of a data export option is indicated (upon registration), it did not work when we tried to use it. A download option in machine-readable (.csv format) is there, but a failure message is received instead of successful download.²⁷ That is unfortunate, since the data contains unique project identifiers which are otherwise very useful for linking this dataset to other ones. In sum, before any automated, robust statistical reuse of this dataset, firstly, various data scrapping methods are necessary to build a machine-readable version²⁸, and, secondly, additional public data requests must be addressed by the data host (covering missing variables in the public version and data on not-successful applicants).

Local election data – 'Helyi önkormányzati választások'

A complete, machine-readable (.xlsx format) dataset on the results of the last local elections in 2019 is accessible at the homepage of the National Election Office (*Nemzeti Választási Iroda*).²⁹ It is published very quickly following the election dates. While data on previous local elections are also available, it should be noted that they are published in a different data structure (e.g., data fields, variables vary across the datasets over election years) and therefore considerable effort is required by data users to systematically link and merge the various election datasets across time. Moreover, linking with other datasets could also be more supported by introducing numerical unique identifiers (for example, by including postal codes, not just the name of the settlements).

Municipality-specific socio-economic data – T-Star database

Various socio-economic data on municipalities is available *via* the *T-Star Database* managed and hosted by the Hungarian Statistical Office (*Központi Statisztikai Hivatal, KSH*).³⁰ While it is public and accessible following a registration process (which is not automatic but requires some administration and official confirmation by the Office), finding downloads in machine-readable format is rather time-consuming. Quick, max. two-click access to the database is not provided at the opening page, the potential data users need to map an extensive webpage menu to arrive at the specific sub-site of the database and finally to get to the download options. Orientation at and understanding the highly technical content of both the official portal and of the T-Star database is not intuitive and it requires track record in user/researcher experience. Finally, the publication of up-to-date data may take considerable time and it is usually in delay with at least two financial years which is fairly beyond reasonable.

²⁶ https://www.palyazat.gov.hu/tamogatott_projektkereso

²⁷ Notably, the .csv-download option is visible only after registration, and inquiries on the failure message were not addressed by mid of March 2022.

²⁸ As it was done and then published by a non-government, research think tank, see the EU funds dataset published by the Corruption Research Centre Budapest: <https://www.crcb.eu/?p=2863> (Accessed: 10 December 2021).

²⁹ <https://www.valasztas.hu/helyi-onkormanyzati-valasztasok-2019>

³⁰ <https://statinfo.ksh.hu/Statinfo/themeSelector.jsp?lang=hu>

Official documentations accompanying the published datasets are either missing (*EMIR*) or are highly technical, miss clear, plain language summaries, so first-time data users may not have sufficient information to understand the source, the substantial content, and the analytical limitations of the specific datasets.

Generally, all these government data hosts could be improved with respect to encouraging citizen engagement and make their data governance framework more transparent and progressive. Quick, one- or two-click accessibility of open data, publication of accompanying documents drafted also in plain language (or publication of versions in plain language, as well – beside the technical notes), and sharing contact information on public data requests could be easily introduced in all these cases. Innovative solutions (such as, data maps for citizens, summaries for citizens/media on EU programme performance) would help potential internet visitors to have a better overview on available government data and orient them in better reuse of these public datasets.

In sum, Hungary fails to coordinate and manage its data policy framework in a transparent and institutionalised way and, while the legal framework is more or less in place, the implementation, the enforcement of the effective rules on access to public information and data is weak.

Both anecdotal evidence, our expert interviews and our own researchers' experience suggest that consultations on the structure, content and linking of the public data sources are, when they can take place at all, usually *ad hoc* and informal – both within the government sector and between the public data hosts and potential re-users (see, primarily, researchers from academia and policy experts). Besides the lack of transparent public consultation processes, the publication of appropriate accompanying documents and the systematic collection and analysis of user-experiences seem to be often missing, or at least, not published and reflected on the corresponding websites. Institutional incentives for data hosts to learn about good practices and eventually innovate their data publishing practices are absent.

The recently re-organised National Data Asset Agency (*Nemzeti Adatvagyon Ügynökség, NAVÜ*, set up originally in 2020) is in charge of the overall coordination and management of the open data policies in Hungary. It operates under the supervision of the Prime Minister's Office.³¹ As part of its legal mandate adopted in 2021³², the NAVÜ will play a pro-active role in setting up a more transparent and inclusive governance framework where for example user-experience and -satisfaction with government data portals are systematically collected and published (see, portal visitor analytics are subject to regular, in-depth analysis), where a multi-stakeholder public consultation process is ongoing between data hosts and (potential) data users, and where linking of different government datasets and databases is technically accomplished. While the NAVÜ competences and tasks are clearly regulated, the development of the Agency's capacities is in progress – as both our interviewees and some recent media news suggest.³³

Finally, it should also be noted that the Hungarian National Treasury (*Magyar Államkincstár, MÁK*) hosts the data on the fiscal transfers allocated to local governments in Hungary, comprising also the intragovernmental transfers financed exclusively by the central budget (beyond the EU co-financed transfers). We did not include this data publication here, since it shares aggregated data, that is, not

³¹ See, <https://www.navu.hu/kozerdeku-adatok>

³² See, the secondary regulation on (re)use of public data, 607/2021. (XI. 5.) Korm. rendelet a nemzeti adatvagyon hasznosításával összefüggő egyes részletszabályokról, <https://njt.hu/jogszabaly/2021-607-20-22> Accessed on 12 March 2022.

³³ For more, see <https://hirlevel.egov.hu/2021/11/06/epulo-nemzeti-adat-okosizsistema-eloadasok-es-kerekasztal-beszelgetes-a-magyar-szinpadon-infoter-konferencia-2021-oktober-20/>.

broken down by settlements/municipalities, but only by transfer types (operational costs, policy-specific supports, such as public health, education and cultural activities) and by months.³⁴

4. Recommendations for improving the open data policy framework in Hungary in general and to fit open data principles in the policy areas relying on EU funds in particular

Hungary – National Data Asset Agency and the national legislators

Strengthen governance, boost citizen engagement

- ➔ Engage with actors from the civil sector, media and academia in the design and monitoring of open data practices and improve mechanisms that support the discoverability, the accessibility and reuse of open government data.
- ➔ Develop a national strategy for open data and align it with the broader strategies at national level (especially, with the Digital Success Programme and the actual public administration reform initiatives).
- ➔ Fully harmonise the national legal framework with the EU Open Data Directive, eliminate inconsistencies.
- ➔ Build capacities and competencies at the National Data Asset Agency in order to enhance its policy coordination role, to speed up the completion of data linking requests and to support reuse of government data both by academic, civil and business stakeholders.

Improve data quality and highlight the social and economic value and impact of open data

- ➔ Follow EU best practices by pro-actively supporting data providers in the public sector in their publication process (by boosting data literacy via trainings, by setting up a network of open data liaison officers in data host institutions, or by helping local- and county-level authorities in building their data manager capacities).
- ➔ Participate and join the OECD's Open Government Data Survey from 2022 onwards and re-join the club of countries participating at the Open Government Partnership international initiative (despite Hungary's exit of this partnership in 2016).

Hungary – Public data hosts relevant in the case of EU funds

Improve data quality and accessibility

- ➔ Follow open data standards and practices by supporting data users in interpreting and understanding the published data sets (e.g., upload of citizen data maps, introduction of plain language-based accompanying documents).
- ➔ Revise the access to open data sources on the institutional website (*palyazat.gov.hu*) and ease discoverability (e.g., inserting marker/one-click bottom on the entry site, re-structuring the website menu to provide max. two-click access to the dataset on supported projects)
- ➔ Improve the quality of data (e.g., reduce missing data categories), build in machine-readable data export options (see, functioning download options in machine-readable formats, especially in .csv- and .xlsx-formats).

Strengthen governance, boost citizen engagement

- ➔ Organise a series of open data events at the institutional level and start an open and structured dialogue with potential re-users.
- ➔ Set up online and in-person communication channels and contact persons for data publication within the organisation (e.g., establishing an open data liaison officers).

³⁴ See: http://www.allamkincstar.gov.hu/files/Mérleg/ek/onkormanyzat/Onk_idosor_2021_04.xls

EU level – Directorate-General for Regional and Urban Policy, Directorate-General for Communications Networks, Content, and Technology

Doublecheck open data policies and practices, help boosting enforcement

- ➔ Consult on a potential national strategy for open data and its consistency with existing line strategies (especially, with the Digital Success Programme and the actual public administration reform initiatives).
- ➔ Enforce the compliance with the EU/ODC open data principles – with a special eye on data quality.
- ➔ Monitor the publication of data on the use of EU funds and check regularly for compliance with the provisions of relevant EU regulations.
EU civil servants, in monitoring the progress of EU-funded projects, should make it a rule to use, wherever possible, Hungarian public monitoring data instead of asking for input by correspondence from their Hungarian colleagues.
- ➔ Ask for systematic collection of experiences of open data (re)users in Hungary and for analysis of data user experiences and satisfaction on a regular basis.
- ➔ Cover open data policy issues in the European Semester and include government data-oriented analysis and suggestions into the Country-Specific Recommendations.
- ➔ Suggest using EU technical assistance i) to build government capacities in easing access to public datasets, in improving data quality by highlighting the social and economic value of open data, and ii) to screen and adapt relevant open data good practices (examples from relevant benchmark countries, such as new Member States (e.g., Poland), or from Portugal could be inspiring).