

A decorative graphic in the upper left quadrant features a cluster of black squares of varying sizes. A thin black arrow curves from the top left towards this cluster, and another thin black arrow curves from the cluster towards the right side of the page. A thin white arrow also points upwards towards the cluster. The background behind this graphic is a soft, multi-colored gradient of blue, green, and pink.

D1.2 Policy Brief

Preparing Europe's Cultural & Creative Sectors and Industries for Responsible and Human-Centric Digital Transition

What European cultural and creative networks can do today to lower fragmentation, strengthen trust, and support practitioners' digital capacity and data literacy

Authors

Erik Hitters [Erasmus University]
Danai Papathanasiou [Erasmus University]
Izabela Derda [Erasmus University]
Stefano Russo [Erasmus University]

Contributors

Fiona Mowat [Europeana]
Léna Lozano [Live DMA]
Gert Naessens [EFA]

Reviewers

Marina Martinez [KEA]
Olga Tykhonova [Museum Booster]





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Policy Brief: Preparing Europe's Cultural & Creative Sectors and Industries for Responsible and Human-Centric Digital Transition

This brief is for: European cultural and creative networks, associations, and umbrella organisations supporting theatres, festivals, museums, live music, heritage, and related CCSI communities. Additionally, it can be employed by policymakers and funders and sector support organisations focusing on digital transition in the CCSI.

Key take aways:

- CCSI remain (digitally) fragmented, with unstructured data practices, uneven digital literacy, and tools that often do not fit sector realities. This causes unnecessary workload, reactive data practices, and low comparability across organisations.
- The EXCENTRIC project finds a strong appetite for collaboration in the sectors, but also high levels of hesitancy caused by resource constraints, trust concerns, ethical uncertainty, and lack of systematic approach to interoperability and data stewardship.
- Collaborative Data Ecosystems (CDEs) offer a collaborative way for organisations to manage, share and use data under shared ethical and governance rules, creating value collectively while keeping data sovereignty.
- The ARCHS Framework (Adaptable, Responsible, Collaborative, Human-Centric, Sustainable) provides a practical compass to design CDEs and support digital transition, offering shared principles across workforce, organisational and network levels that help CCSI assess, steer and align data practices with their values.
- Umbrella organisations are best positioned to convene, translate, and promote shared practices, helping members align data practices, reduce fragmentation, and strengthen collective capacity for value creation, learning and trust-based governance.



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1. Introduction

This Policy Brief is addressed to European cultural and creative networks and umbrella practitioner organisations, at national and supranational level and provides an overview of the of the current digital transition challenges in the Cultural and Creative Sectors and Industries (CCSI). It presents preliminary policy insights emerging from the first-year activities of the EXCENTRIC project, based on academic research, sector dialogue, and empirical work with the pilot organisations.¹

Stemming from identified needs and challenges of European CCSI, EXCENTRIC explores CDEs as a way for organisations to manage, share and use data through common governance frameworks, while retaining data sovereignty and organisational autonomy. By enabling coordination and interoperability across organisations, CDEs can act as an engine for a digital transition of CCSI, supporting longer-term competitiveness and sustainability.

To guide this effort, EXCENTRIC introduced the ARCHS Framework as a practical compass for digital transition. Built around five principles – Adaptable, Responsible, Collaborative, Human-centric and Sustainable – and applied across workforce, organisational and network levels, ARCHS aims to equip stakeholders with tools for assessment, decision making, and monitoring of data practices in ways that align with cultural values and sector realities. Such approach goes beyond platform centrism, or sole investment in talent development and competitiveness areas strictly linked to digital transition. Instead, it revolves around consent-by-design data practice and recalibrates the digital transition in the hands of those who are asked to embrace it, namely the cultural and creative workforce.

Networks and umbrella organisations are invited to consult [D1.1 – Initial ARCHS Framework](#) and subscribe to the [EXCENTRIC Newsletter](#) to receive upcoming pilot updates (M13–M24), feedback windows, and publications notifications.

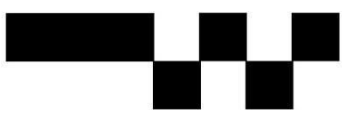
2. CCSI challenges

Across academic literature, EU project deliverables, EU policy reports, and empirical research with umbrella and pilot organisations, a consistent set of structural challenges to the digital transition in the CCSI emerges. Table 1 summarises challenges identified in EU policy reports, deliverables from other European projects, and relevant academic literature, and then extends this overview with insights from EXCENTRIC’s umbrella (n = 3) and pilot organisations (n = 6). The overview of challenges highlights the need for policy recommendations to support the digital transition of the CCSI and underscores the potential of Collaborative Data Ecosystems as a response.

Table 1 – Identified challenges and insights in CCSI

Challenges		Insights	Identified by Umbrella Organisations	Identified by Pilots
As identified by EU reports and	Resources (financial, staff, time)	Resource constraints stem from limited staffing and increasing organisational responsibilities. Financial pressure is linked to	✓	✓

¹ EXCENTRIC’s umbrella and pilot organisations span four sectors: festivals, live music, performing arts, and museums.





academic literature ²		budget cuts, inflation and political instability.		
	Digital literacy (staff & leadership)	Digital skills gaps mainly stem from the lack of resources (staff, time) and precarious funding, which restrict investment in training, professionalisation and innovation.	✓	✓
	Data awareness (internal)	Organisations lack a clear overview of the data they have available internally.	✓	X
	Data structure and interoperability	Data is collected through multiple and external tools, in different formats and storage systems, which limits shareability with internal and external partners.	✓	✓
	Data literacy and use	There is limited clarity about which data is available, relevant and accessible.	✓	X
	Data collaboration (external)	Data collaboration with external partners is limited and fragmentary reducing opportunities for shared standards and collective learning.	✓	✓
	Data vision and purpose	There is no sufficient data intelligence; a clear articulation of what data is expected to measure or support at organisational or network level.	✓	✓
	Legal & Ethical concerns	Legal and ethical concerns include uncertainty around data protection and emerging AI tools, often linked to fears of automation and limited understanding of how such tools operate.	✓	✓
As identified by EXCENTRIC project's	Digital tools alignment for CCSI	Available digital tools often do not align with the specific needs of CCSI organisations, resulting in the use of multiple systems and fragmented, asynchronous data. Financial constraints frequently limit the adoption of	✓	✓

² De Voldere et al. (2024). *EU culture and creative sectors policy: Overview and future perspectives*. Eguia et al. (2025). *Barriers to the digital transformation of cultural and creative industry MSMEs: The case of the Basque Country*. European Commission. (2024). *Needs and challenges of the cultural and creative industries*. European Innovation Council and SMEs Executive Agency. (2025). *New report: Unleashing the potential of the cultural and creative industries*. McDonald & Jordan. (2023). *Detecting dark matter data: Data gaps for innovation and R&D activity in the creative industries*. Pererva & Mazorenko. (2025). *Digital transformation of creative industries: Challenges, opportunities and the role of digital tools*. Roecker et al. (2017). *Digitized products: Challenges and practices from the creative industries*. Runnel et al. (2021). *Guidelines report: Data and impact. Guidelines on how data helps to understand the impact of the CCIs*. Safavi & Ghazinoory. (2025). *Creative bits: Challenges of applying industry 4.0 in digital creative industries*.



diagnostic process³⁴		systematic approaches and practices.		
	Digital maturity	While willingness to experiment with new tools exists, the precarity of the sector, regulatory uncertainty and budget constraints lead organisations to hesitate, often requiring proof of effectiveness before adoption.	✓	✓
	Policy awareness and internal clarity	Digital policies are not consistently visible, clearly understood and respectively adopted across organisations.	✓	✓
	Ad hoc policy maintenance	Digital policies are reviewed and updated in a largely reactive manner.	x	✓
	Formalisation of training (policy-to-practice gap)	Training related to digital policies and data practices is uneven and chronically unsystematic, oftentimes being left to self-learning on the go.	x	✓
	AI governance and AI capacity gap	Digital governance frameworks for AI and organisational capacity to engage with AI is limited and connected to strong anxieties.	✓	✓
	External learning / benchmarking capacity	Engagement with external digital learning, benchmarking, and horizon-scanning practices are inconsistent.	✓	✓
	Collaboration Readiness	Willingness to collaborate is high, but differences in data standardisation, hygiene and governance stewardship across organisations and countries complicate coordination and joint initiatives.	✓	✓
	Leadership	Leadership challenges include the absence of a clear vision on digital transition, uneven professionalisation, and generational gaps in digital competencies.	✓	✓

What this evidence shows

- Digital transition barriers in the CCSI are structural rather than motivational.
- Resource constraints and digital literacy gaps underpin most challenges.

⁴ Soldati et al. (2026). *Deliverable 2.1 – Pre-piloting diagnostic and needs assessment report.*



- Fragmented and ill-fitting tools result in siloed, unstructured and non-comparable data.
- Trust, legal and ethical concerns actively shape adoption and experimentation.
- Digital policies and governance practices are unevenly embedded, with limited internal clarity and weak translation into consistent organisational practice and clear governance.
- The importance of data is acknowledged, but rather aspirationally, with its gathering lacking in clear purpose, structure or scope.

Evidence from organisational practice shows that, while cultural organisations recognise the importance of data collection, its further use often remains unclear. Data is frequently gathered without a defined purpose, limiting its value for decision-making and learning. Even in more data-fluent organisations, obstacles are primarily linked to limited financial, technical, and human resources.

Despite these obstacles, CCSI remain actively engaged in efforts to improve their practices through digital transformation. A shift in emphasis emerges from practice: rather than focusing solely on *being data-driven*, organisations increasingly stress the importance of *driving data* in support of organisational missions, values and communities. This gap is reinforced by unevenly embedded digital policies and governance practices, which often lack clear ownership and consistent translation into decision-making and everyday organisational routines.

Concerning needs, organisations consistently highlight the importance of coherence in how data is collected, aggregated, interpreted, shared, and reused. Subsequently, advancing digital literacy, as well as data confidence, is needed both within organisations and among audiences. In terms of needs, organisations emphasise the importance of flexible technologies that account for the usability requirements of both staff and audiences. These technologies should also align with – and be adaptable to – the organisation’s specific context and operating model.

3. Policy recommendations

Why aligning data practices matters

Across European cultural and creative sectors, digital transition is conditioned by a combination of structural constraints, including limited resources, uneven digital literacy, legal and ethical uncertainty, and fragmented data practices across organisations. While many organisations are willing to experiment with digital tools, these conditions often prevent (co)learning, reuse, and collaboration on a data level. As a result, many organisations struggle to move beyond local, organisation-specific uses of digital tools and data.

Policy gaps which hold the sector back



- Skills & literacy: targeted upskilling on data governance, interoperability and AI literacy in CCSI remains uneven across Member States⁵, despite policy attention to the digital transition.
- Interoperability & comparability: the Data Governance Act ⁶ and the Data Act ⁷ provide cross-sector mechanisms for trusted sharing and fair access, but the CCSI still lack widely adopted minimum-viable standards to make collaboration practical.
- Ethics & AI governance capacity: the AI Act ⁸ phases in obligations between 2025 and 2027, yet many cultural organisations and networks lack the capacity to interpret requirements and adapt processes proportionately
- Fragmented funding & evaluation logics: calls and evaluation frameworks often reward short-term outputs over shared infrastructure and standardisation, despite EU policy stressing coordination and sustainability.

A shared approach: Collaborative Data Ecosystems

The EXCENTRIC project proposes **Collaborative Data Ecosystems (CDEs)** as a shared approach to enable **dedicated** data practices tailored across cultural and creative organisations.

Collaborative Data Ecosystem (CDE) is a network of organisations that manage, share, and use data through common governance frameworks, ensuring security, an ethical practice, and data sovereignty, while enabling collective value creation that would not be possible individually.

Successful applications in other industries, such as medicine, pharma, energy, and logistics, where similar approaches have led to significant operational cost reductions (over 10% annually), elevated customer satisfaction (15% higher), and marked financial gains (4-10% increase in yearly revenue), stemming from new income sources, business models, and enhanced productivity.⁹ In a still fragmented industry such as the CCSI, with a high proportion of microenterprises and SME's, project-based activities and job precarity, CDEs therefore represent a viable pathway to support competitive and sustainable digital transition, particularly given that networking and collaboration are already embedded in the nature of the sector.

The EXCENTRIC project identifies Collaborative Data Ecosystems as a promising pathway for digital transition of the CCSI.

A guiding compass: the ARCHS Framework

⁵ Council of the European Union. (2022). *Council resolution on the EU Work Plan for Culture 2023–2026*.

⁶ European Parliament and Council of the European Union. (2022). *Data Governance Act*.

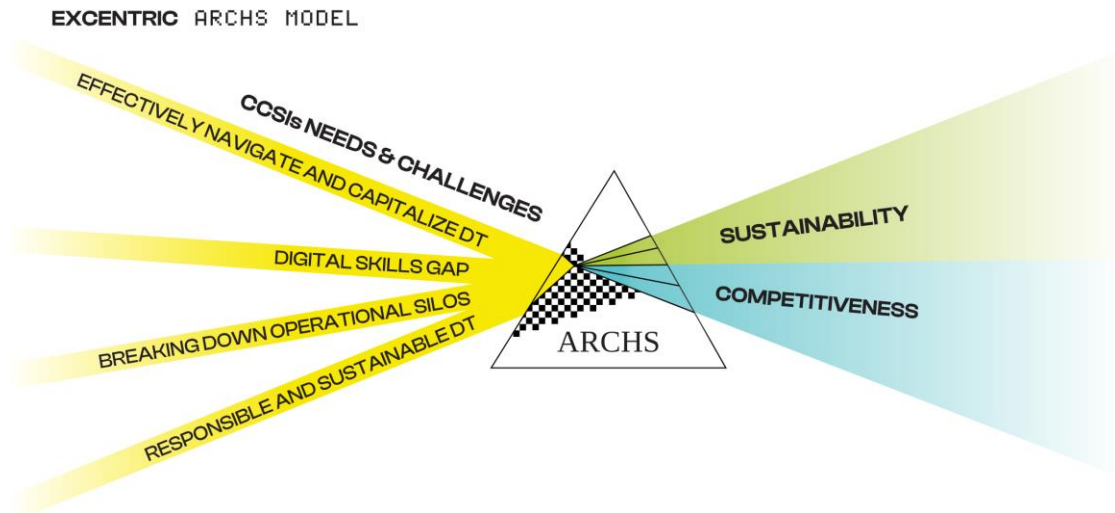
⁷ European Parliament and Council of the European Union. (2020). *Directive (EU) 2020/1828 on representative actions for the protection of the collective interests of consumers and repealing Directive 2009/22/EC*.

⁸ European Parliament and Council of the European Union. (2024). *Artificial Intelligence Act*.

⁹ Capgemini. (2020). *The data-powered enterprise: Why organizations must strengthen their data mastery*.



To support the development of CDEs in ways that align with the values and realities of the CCSI, the EXCENTRIC project introduces the **ARCHS Framework** as a shared guiding compass.



The ARCHS Framework (Derda et al., 2025) revolves around five guiding principles - Adaptable, Responsible, Collaborative, Human-centric, Sustainable and provides a practical reference to design CDEs and support digital transition, by offering a common set of principles for assessing, guiding and monitoring shared data practices.

ARCHS operates across three interrelated levels:

- individual (workforce)
- organisational (enterprise or organisation)
- and network level (supply chains, partners, collaborators).

By applying these principles across the three levels, the framework supports organisations and networks align data practices while acknowledging different roles, capacities, and responsibilities. Importantly, ARCHS does not introduce new compliance requirements. It functions as a shared language, orientation and alignment tool, supporting dialogue and coordination across organisations involved in CDEs. Ultimately, it helps enable a collaborative, shared standards-aware minimum-viable data practice that can be taken up and adapted across organisations within an ecosystem.

Directions for networks and umbrella organisations

The following directions reflect commonly identified needs and opportunities for networks and umbrella organisations supporting digital transition across multi-organisational settings.

Networks and umbrella organisations may consider:

- Facilitating dialogue on shared data practices - creating spaces for members to reflect on how data is currently collected, governed and used, and to identify shared objectives where alignment could reduce fragmentation without limiting organisational autonomy.



- Promoting consent-by-design governance approaches - helping clarify ethical red threads and red lines, responsibilities and access rules for data use, in ways that build trust among organisations and with audiences.
- Using the ARCHS Framework as a shared compass for CDEs - applying ARCHS as a common language to develop data practices across workforce, organisational and network levels, particularly in collaborations involving organisations with different capacities.
- Encouraging peer learning across organisations - supporting exchange of experiences (practices, protocols, standards), challenges and data rather than introducing new platforms or mandatory systems.

This approach goes beyond ad-hoc clustering: it asks national and supranational networks and umbrella organisations to advocate for collaborative digital transition, built on human-centric principles, consent-by-design governance and shared practices.

Policy alignment

The European Commission's Culture Compass for Europe ¹⁰ explicitly links culture to competitiveness and resilience; EXCENTRIC delivers the "how": CDEs create trusted, federated environments to manage/share data under common rules, while Adaptable and Collaborative routines establish a minimum-viable data practice. This aligns directly with the Data Governance Act (DGA), which was designed to increase trust and availability in data sharing across sectors, and with the Data Act, which aims to unlock fair access, interoperability, and switching across data processing services.

The Compass recognises both the opportunities and risks of Artificial Intelligence for culture. EXCENTRIC's approach (risk-based, human-centric, consent-aware and standards-oriented) offers an opportunity for the sector to meet new requirements without centralisation or tool proliferation, while strengthening audience trust and institutional accountability.

For CCSI policy, the Council Work Plan for Culture 2023–2026 prioritises the digital transition, working conditions and partnerships; EXCENTRIC contributes by providing concrete mechanisms (shared standards, peer learning) that networks can deploy across members. Funding-wise, Creative Europe 2021–2027 emphasises cross-border cooperation, innovation and resilience; EXCENTRIC's minimum-viable practice is an efficient, scalable use of such funds because it builds durable capacity (standards, governance, skills) rather than short-lived tools.

4. Conclusion

This Policy Brief has outlined European CCSI key challenges in their digital transformation, including limited resources, uneven digital literacy, legal and ethical uncertainty, and fragmented data practices across multi-organisational settings. While willingness to experiment with digital tools exists, these structural conditions often limit coherence, effective reuse and collaboration beyond individual organisations.

In response, the brief has presented CDEs as a shared approach to aligning data practices across organisations. To support this approach, the ARCHS Framework is proposed as a practical compass for guiding digital transition across workforce, organisational and network levels, grounded in five principles: Adaptable, Responsible, Collaborative, Human-centric and

¹⁰ European Commission. (2025). *A Culture Compass for Europe*.



Sustainable. Together, CDEs and ARCHS offer a way to support more coherent, value-aligned digital practices in a fragmented sector, while deliberately moving beyond both (i) reinforced, centralised platform-centric solutions replacing the over-abundance of existing tools, and (ii) surveillance-oriented approaches based on mandatory data handover.

The approach outlined in this brief adopts a human-centric perspective on digital transition. By emphasising a consolidation of effort modality and consent-by-design practices that are intrinsic to the specificities of the CCSI, it can support the adoption of CDE practices.

Considering the evolving roles of the CCSI and the current policy attention and budgetary context for culture, this brief invites networks and umbrella organisations to consider CDEs as an organising, future-looking approach for digital transition. In doing so, alignment of governance arrangements, consent practices and shared indicators with everyday organisational realities can be strengthened, contributing over time to a less fragmented and less precarious sector landscape.



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6. Appendix

EXCENTRIC draws on knowledge produced by other data-focused projects, programmes, and initiatives. The table below presents a selection included for their thematic alignment and for the insights they provide in informing this work.

Project	Short description
<u>CCI Thrive (Creative Europe)</u>	Explores cross-sectoral collaboration and the potential of “smart” / digital technologies for new business models and cultural productions, using a data-driven approach.
<u>CHANGES – Cultural Heritage Active Innovation for Sustainable Society</u>	Promotes technological and multidisciplinary development of humanistic culture and cultural heritage, focusing on education, research and technology transfer.
<u>Common European Data Space for Cultural Heritage (Digital Europe)</u>	EU flagship to accelerate the digital transformation of the cultural heritage sector, enabling open and trustworthy sharing and reuse of heritage data, supported by infrastructure, community, and capacity-building.
<u>Creative Informatics (Edinburgh, UK)</u>	Research & development programme bringing creative industries and the tech/data ecosystem together, helping creative practitioners and businesses innovate using data and data-driven technologies.
<u>CultuurCampus</u>	A city-making and New European Bauhaus lighthouse-type intervention in Rotterdam South, bringing education, research, policy, culture and citizens’ lived experience together
<u>DOORS – Digital Incubator for muSeums</u>	Creates a European incubator for small and medium-sized museums, supporting digital transformation with strategies shaped around museums’ specific values and contexts.
<u>inDICES</u>	Develops methods and tools to understand/measure dimensions of digitisation in culture.
<u>INVENT – European Inventory of Societal Values of Culture</u>	Develops methodologies for understanding the value of culture in European societies and builds a dynamic, interactive inventory of societal values of culture to inform cultural policy.
<u>ekip – European Cultural & Creative Industries Innovation Policy Platform</u>	Employs open innovation principles to build a partner-and network-driven policy recommendation engine for the cultural and creative industries.
<u>Label4Future</u>	Supports greener transition/circular economy by leveraging design/creative skills, engaging quadruple-helix stakeholders.
<u>Me-Mind (Museums and Events – Measuring Impact on local eNvironment with Data analytics) (Creative Europe)</u>	Focuses on how cultural organisations can use data to better understand and communicate the economic and social impact they generate in their local environment. It takes a cross-sectoral approach and follows the data lifecycle - from contextual analysis to data collection and visualisation.
<u>PULSE</u>	Focuses on data-driven socio-economic models, addressing change requirements related to business orientation and strategy.



<u>RECHARGE</u>	Sets up participatory living labs to co-create and prototype participatory business models for cultural heritage institutions;
<u>SEISMEC</u>	Demonstrates empowered, human-centred and ethical development of digital/industrial technologies through pilots, using a two-way engagement approach involving end-users/workers (the “SEISMEC shift”).