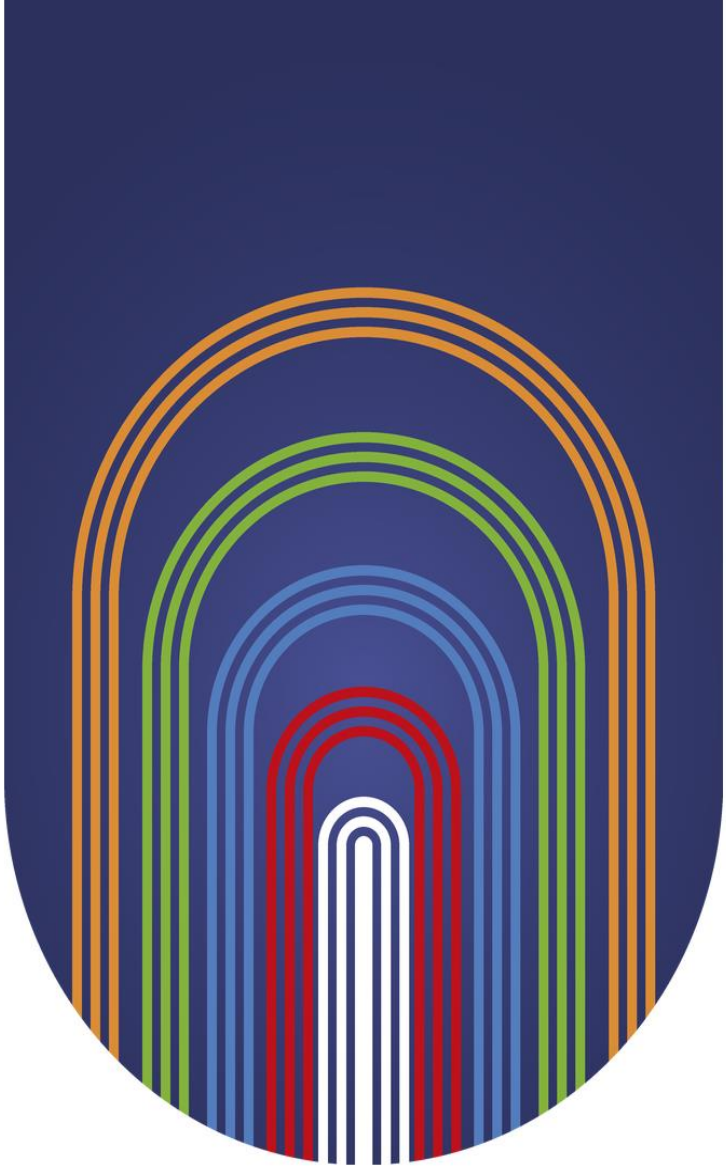
ESG FOR GLAM



Framework validation report

2026

Co-funded by the European Union

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Framework Validation Report

ESG4GLAM project

Validation of the ESG4GLAM Competency Framework for GLAM professionals

Co-funded by the Erasmus+ Programme of the European Union

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Executive summary

This report is Deliverable D2.5 of the ESG4GLAM project. It documents how the ESG4GLAM Competency Framework for galleries, libraries, archives and museums (GLAM) was validated with stakeholders. The framework has 31 competencies in four domains (Cross-Cutting, Environmental, Social and Governance) and five progression levels aligned with the European Qualifications Framework (EQF). Validation used two methods: an online validation survey for professionals from the cultural sector (Part 1) and partner-led focus groups (Part 2). The survey ran on the project website and was promoted through the consortium networks. It collected **102 valid responses** from more than 70 organisations in **12 countries** between 4 September and 5 October 2026, and 85% of responses arrived in September. The ten focus groups were held between 8 and 23 September 2026 in four countries and involved 34 participants.

102	12	91.2%	94.1%	56
validated survey responses	countries represented	consider the framework a valid reference tool	see it as a basis for the 35-hour course	written comments from 33 respondents

Key findings

- **The framework is validated overall; the level model needs revision.** 93 of 102 respondents (91.2%) consider it a valid reference tool for the European GLAM sector. This meets the 90% approval target set for this deliverable in the project application. Of these, 70 endorse it without reservation and 23 endorse it subject to adjustments. The focus groups confirm the architecture but do not yet support the five-level structure in its current form (see Focus group findings below).
- **Content validity is high.** 88.2% find the 31 competencies and four domains complete and relevant. 94.1% agree that the framework is a solid basis for the upcoming 35-hour ESG4GLAM training course.
- **Clarity and the level model are good but can be improved.** 82.4% find the descriptions clear for non-ESG specialists, and 82.4% find that the five levels (L1–

L5, EQF 3–8) match real GLAM careers. Critical comments ask for plainer language, more concrete examples and a less linear reading of the level model.

- **Practical applicability is the weakest criterion.** 74.5% expect their institution to apply the framework in practice. The main barriers are limited time, budget and staff. Small and medium-sized institutions in particular ask for a lighter entry point, such as a checklist or self-assessment toolkit.
- **Results differ between groups.** Among the larger groups, libraries (94.7% overall endorsement) and respondents from Serbia and Latvia are the most positive. Museums, especially in Finland, give the most detailed and critical feedback, mainly on structure, language and applicability. Respondents from partner organisations are slightly more critical than others, which makes it unlikely that the positive result comes from the consortium's own networks.
- **Training priorities are clear.** Cross-Cutting competencies, such as basic ESG literacy and digital sustainability, are mentioned most often (51%), followed by Social competencies (42%). Environmental (25%) and Governance (24%) competencies are mentioned less often.

Main recommendations

- Keep the four-domain, 31-competency architecture. Consolidate wording where competencies overlap, align competency titles with their descriptions, and resolve the 29/31 competency reference in D2.4.
- Publish a plain-language version, a glossary and a one-page self-assessment checklist for small institutions alongside the full framework.
- State explicitly that the EQF mapping is indicative and that levels describe ESG responsibility, not seniority. Broaden the example roles (educators, producers, technical staff, collection and fine-art logistics specialists).
- Sequence the 35-hour course as a Cross-Cutting foundation, followed by Social, Environmental and Governance modules, with optional pathways by institution type and size.

Focus group findings

Five partners (Humak, Forum Marinum, Jelgava City Library, Mazzini Lab and the University of Novi Sad) each ran two focus groups in Finland, Latvia, Italy and Serbia.

Five groups met in person and five online. They involved **34 participants and logged 84 change requests**. The groups discussed the framework against the same five criteria as the survey. They indicate that the framework's overall architecture is relevant and broadly comprehensive at overview level, but they do not yet validate its five-level structure or its readiness for use in small institutions.

- **Content, clarity and applicability confirm the survey.** All ten groups judged the architecture (four domains, 31 competencies) comprehensive and relevant, and none asked for a domain to be added. Clarity is uneven and needs plain-language support, a glossary and examples. Uptake depends on an entry version, examples and tools, and on anchoring in funders, planning cycles and existing standards.
- **The level model is judged more critically than in the survey.** Every group raised at least one point on L1–L5. Seven groups asked to decouple levels from job titles and seniority and to assess them per competency; five asked for richer descriptors. The level-related recommendations (R1, R2) are provisional until the comments that refer to the full version have been checked against it.
- **Targeted content questions emerged.** Six groups saw overlap in the ESG data competencies; four asked that emergency preparedness (ENV-07, GOV-03) cover civil protection, conflict and other hazards; four questioned or widened the scope of CC-06.
- **High-priority recommendations from the focus groups** are R1–R6, R10 and R11 (Section 4.4); the comparison with the survey is in Section 4.6.

Introduction

ESG4GLAM is a Cooperation Partnership in Vocational Education and Training funded by the Erasmus+ Programme (KA220-VET, Agreement No. 2025-1-IT01-KA220-VET-000364271). Its aim is to equip galleries, libraries, archives and museums (GLAM) with the knowledge and competencies needed to apply Environmental, Social and Governance (ESG) principles in their institutions. The consortium is coordinated by Mazzini Lab S.r.l. Benefit (Italy). The partners are the University of Novi Sad (Serbia), Jelgava City Library (Latvia), Humak University of Applied Sciences (Finland), Fonderia Artistica Battaglia (Italy) and the Forum Marinum Foundation (Finland). Together they combine academic research, vocational training and day-to-day GLAM practice from Northern, Eastern and Southern Europe.

Work Package 2 (WP2), led by the University of Novi Sad, defines the skills and competencies that ESG professionals in the cultural sector need. WP2 follows a cumulative logic. A desk-based report first systematised existing knowledge on ESG in the GLAM sector (A2.1). An ESG competency needs analysis then collected primary evidence from 120 survey responses in 16 countries, six focus groups with 43 participants and 34 expert interviews (A2.2). Building on this evidence, the partners defined the core competencies and developed the ESG4GLAM Competency Framework (A2.3–A2.4). The framework has 31 competencies grouped into four domains and five progression levels aligned with the EQF.

The final step of WP2, Activity A2.5 “Collaborative validation and stakeholder engagement”, tests whether this framework is relevant, understandable and usable for the professionals and institutions it is meant to serve. In line with the project application, validation took place through an engagement process with cultural institutions, educational providers and industry professionals. Feedback was collected through two complementary channels:

- **An online validation survey** published on the ESG4GLAM website and distributed through the consortium networks. The survey collected 102 responses from GLAM professionals and related stakeholders between 4 September and 5 October 2026.

- **Validation focus groups** organised by the project partners: ten focus groups, two at each of five partner institutions (Humak and Forum Marinum in Finland, Jelgava City Library in Latvia, Mazzini Lab in Italy and the University of Novi Sad in Serbia), held between 8 and 23 September 2026, with 34 participants.

This report brings together the evidence from both channels. It assesses whether the framework meets the quality targets set in the project application, identifies where it needs refinement, and turns stakeholder feedback into concrete recommendations for the final version of the framework and for the design of the ESG4GLAM training course and ESG Knowledge Box in Work Package 3 (WP3).

The report is structured as follows. Section 1 sets out the purpose, scope and validation criteria. Section 2 describes the datasets used. The evidence is then presented in two parts. Part 1 (Section 3) analyses the online validation survey in detail. Part 2 (Section 4) presents the focus groups and compares their findings with the survey. Section 5 assesses achievement of the validation indicators, and Section 6 consolidates the feedback from both sources into recommended adjustments. Sections 7 and 8 present the conclusions and future directions. The annexes contain the survey instrument, the coding frame for open-ended answers, supplementary tables and a list of abbreviations.

1. Purpose and scope of the validation

1.1. Objectives of the validation

A competency framework is only useful if the people who will use it recognise it as an accurate and practical description of their work. The validation therefore asks whether the ESG4GLAM Competency Framework, developed on the basis of the needs analysis, is ready to serve as a shared reference for the sector and as the foundation for the project's training offer. Specifically, the validation aims to:

- confirm the **completeness and relevance** of the 31 competencies and four domains for ESG work in GLAM institutions;
- test the **clarity** of the competency descriptions and practical examples for professionals who are not ESG specialists;
- verify that the **five progression levels** (L1 Associate to L5 Principal, mapped to EQF levels 3–8) reflect real roles and career paths;
- assess the **practical applicability** of the framework in institutions, e.g. for job descriptions, staff training, self-assessment and strategic planning, and identify barriers;
- confirm the framework as a **basis for the 35-hour ESG4GLAM training course** and collect priorities for its sequencing;
- obtain an **overall judgement of validity** and collect suggestions to feed into the final framework and WP3.

1.2. The framework under validation

The ESG4GLAM Competency Framework translates ESG principles into a sector-specific competency language and GLAM workplaces' real practice. It is organised into four domains, summarised in Table 1. Each competency has a description, practical examples and level descriptors. The needs analysis gave each domain a mean competency gap score, the difference between the importance of a competency and the current proficiency level. The highest gap was in the Cross-Cutting domain.

Table 1. Structure of the ESG4GLAM Competency Framework

Domain	Codes	No.	Scope (selected competencies)	Gap score*
I. Cross-Cutting	CC-01 – CC-06	6	ESG literacy; interlinkages between E, S and G; organisational change; moving beyond box-ticking; basic ESG data; digital sustainability and responsible AI	1.68
II. Environmental	ENV-01 – ENV-08	8	Environmental compliance; energy and climate control; sustainable exhibitions; eco-conscious preventive conservation; procurement; waste and circularity; emergency preparedness; monitoring	1.51
III. Social	SOC-01 – SOC-09	9	Inclusive access; community co-creation; diversity and inclusion; social impact assessment; safeguarding; accessible communication; partnerships; feedback; staff wellbeing	1.26
IV. Governance	GOV-01 – GOV-08	8	Ethics in cultural stewardship; transparency; risk and internal control; ESG in planning; stakeholder reporting; GDPR; ESG data management; governance of partners and suppliers	1.25

** Mean gap score from the ESG competency needs analysis (importance minus current proficiency).*

Competencies are described at five progression levels: **L1 Associate** (EQF 3–4; trainees, volunteers and assistants working under supervision), **L2 Professional** (EQF 5–6; librarians, curators, archivists and conservators working independently), **L3 Senior Professional / Manager** (EQF 6–7; department or site managers), **L4 Lead Professional / Senior Manager** (EQF 7–8; deputy directors and heads of institutions) and **L5 Principal** (EQF 8; directors of large or national institutions and network coordinators). The framework is aligned with sector codes of ethics (ICOM, IFLA, ICA), the Faro Convention, the Bizot Green Protocol, European accessibility legislation, the GDPR, the UN SDGs, GRI, CSRD/ESRS, the EU Taxonomy and the EQF.

1.3. Validation criteria and performance indicators

The project application sets explicit targets for the framework and for this validation report. Table 2 shows how each target is operationalised in the validation evidence. Achievement of the indicators is assessed in Section 5.

Table 2. Validation indicators from the project application and how they are measured

Indicator (project application, WP2)	Target	Operationalisation in this report
Validation of the framework with feedback from different stakeholders from diverse cultural settings	≥ 100 stakeholders	Number of survey respondents plus focus group participants; diversity by institution type and country
Validation approval rate from stakeholders involved in the review	≥ 90%	Share of "Yes" answers to Q7 "Is the framework a valid reference tool for the European GLAM sector?" (harmonised, see Section 3.6)
Utility and applicability of the framework in addressing real-world challenges	≥ 90% positive	Q5 (basis for training) and Q4 (practical applicability), complemented by focus group evidence
Incorporation of stakeholder feedback into the final framework	≥ 80% of key suggestions integrated	Feedback-to-action matrix (Section 6); implementation documented in the Version Comparison Matrix that accompanies the final framework
Dissemination of findings and validation report	≥ 5 channels	Channels used to disseminate the framework and validation results (Section 5)

2. Dataset description

2.1. Overview of validation data sources

The validation combines qualitative and quantitative evidence. The online survey gives breadth: it collects comparable judgements on the same validation criteria from a larger and more diverse group of stakeholders across Europe, with most respondents from the countries represented in the project consortium. The focus groups give depth: they show how professionals interpret the framework, which competencies they find most and least relevant, and what practical adjustments they suggest. Table 3 summarises both data sources.

Table 3. Validation data sources

	Online validation survey	Validation focus groups
Instrument	Structured online questionnaire: 5 core yes/no criteria with optional explanations, 2 optional questions	Common reporting template provided by UNS: five questions (completeness and relevance, clarity, levels and progression, use in practice, priorities and uptake) and an open closing question
Lead / organisers	UNS (WP2 leader), with dissemination by all partners	Five partners, two groups each: Humak, Forum Marinum, Jelgava City Library, Mazzini Lab and UNS
Period	4 September – 5 October 2026	8–23 September 2026
Countries	12 countries (Latvia, Finland, Italy, Serbia, Spain, Estonia, Sweden, Poland, Czechia, Germany, Bosnia and Herzegovina, Australia)	4 countries (Finland, Latvia, Italy, Serbia)
Participants	102 respondents from more than 70 organisations	34 participants, in 10 groups (5 in person, 5 online)
Type of data	Quantitative (binary and multiple-choice items) and qualitative (56 open comments)	Qualitative: ten partner-written focus group reports on the common template, with 84 logged change requests

2.2. Online validation survey dataset

The survey dataset was exported from the project website's form system (Forminator) on 6 October 2026. It contains **102 records and 18 fields**: submission time, four identification fields (first name, last name, e-mail address and organisation), institution type, the five core validation questions with their optional explanations, two optional questions (training priority and overall validity) and the consent field. Table 4 shows the structure of the instrument and the completeness of each item.

Table 4. Structure of the survey instrument and item completeness (n = 102)

Item	Content	Response format	Valid answers
Profile	Organisation; type of GLAM organisation	Text; single choice (Library, Museum, Archive, Other)	102 (100%)
Q1	Do the 31 competencies and 4 domains cover what GLAM professionals need for ESG work?	Yes / No + optional explanation	102; 11 comments
Q2	Are descriptions and examples clear enough for non-ESG specialists?	Yes / No + optional explanation	102; 8 comments
Q3	Do the 5 levels (L1–L5, EQF 3–8) match real roles and career paths in GLAM?	Yes / No + optional explanation	102; 17 comments
Q4	Can your institution practically apply the framework?	Yes / No + optional explanation of main obstacle	102; 20 comments
Q5	Is the framework a useful basis for the 35-hour ESG4GLAM training course?	Yes / No	102 (100%)
Q6	Which ESG domain should the course prioritise first? (optional)	Multiple choice (4 domains)	96 (94.1%)
Q7	Is the framework a valid reference tool for the European GLAM sector? (optional)	Single choice (see Section 3.6)	102 (100%)
Consent	Acceptance of the privacy policy	Checkbox	102 (100%)

The data quality is high. There are no duplicate submissions (all e-mail addresses are unique), no missing answers on mandatory items, and all respondents gave informed

consent. Although Q7 was optional, every respondent answered it. In total, 33 respondents (32.4%) left at least one written comment, giving 56 comments. Two comments were written in Latvian and Italian and were translated into English for analysis.

2.3. Data preparation and harmonisation

The following data preparation steps were applied before analysis. All steps are documented and reproducible.

- **Pseudonymisation.** Names and e-mail addresses were used only to check for duplicates and to identify the country of the organisation. They were removed from the analytical dataset. Organisation names are not reported in this document.
- **Country of organisation.** The survey did not ask for country. Country was derived from the organisation name and the institutional e-mail domain. For the 29 respondents using generic e-mail providers, country was assigned from the organisation name and, in a few inconclusive cases, from other contextual information. The resulting distribution should be read as a close approximation.
- **Institution type.** The self-reported type (Library, Museum, Archive, Other) was retained. Respondents who selected "Other" (n = 32) were further classified from their organisation into five sub-groups (see Section 3.3).
- **Training priority (Q6).** Q6 allowed several domains to be selected, so it was split into four binary indicators, one per domain.
- **Overall validity (Q7).** The answer options of Q7 were revised during data collection. The two versions were harmonised into a common endorse / do not endorse indicator, as explained in Section 3.6.
- **Open-ended answers.** The answers were coded thematically. The coding frame is given in Annex 2.

2.4. Data protection and research ethics

Participation was voluntary. Before submitting the form, respondents had to accept the project's privacy policy, which states that names and organisations are kept confidential and are not published with individual answers. Personal data are processed in line with the General Data Protection Regulation (EU) 2016/679 and are accessible only to the WP2 research team. In this report, quotations are anonymised and attributed only by institution type and, where groups are large enough to prevent identification, by country.

2.5. Focus group dataset

The focus group dataset consists of **ten partner-written reports**, one for each session, completed on the common reporting template that UNS provided. Five sessions were held in person and five online. Where durations are reported, they range from just under one hour to over 90 minutes. The reports give 34 participants (facilitators and note-takers excluded) and log **84 change requests**.

The reports were read in full and their findings were coded by theme, competency code and focus group. The analysis is based on the reports and not on transcripts, recordings or attendance lists. This report names no participants: focus groups are cited by code (for example HU-1) and, where needed, by participant role. Organisation, participants, method and limitations are described in Sections 4.1 and 4.2.

3. Online validation survey (Part 1)

3.1. Survey design and administration

The online validation survey was designed by the WP2 team to collect structured, comparable judgements on the framework from a broad group of stakeholders. It was published as a form on the ESG4GLAM website, next to the downloadable full and core versions of the framework (D2.4), so that respondents could review the framework before answering. The instrument was short on purpose, to make participation easy for busy professionals. Five core questions each address one validation criterion and use a binary Yes/No format, with an optional explanation of up to 400 characters for negative answers. Two optional questions ask about training priorities and an overall judgement of validity (see Annex 1).

The survey was promoted through the consortium's professional networks in Italy, Finland, Latvia and Serbia, as well as through partners' international contacts. Responses were collected between **4 September and 5 October 2026**, and 87 of 102 responses (85.3%) arrived in September. Figure 1 shows three clear peaks: 8–11 September (33 responses), 17–18 September (13 responses) and 30 September – 1 October (22 responses). These peaks coincide with targeted dissemination by partners.

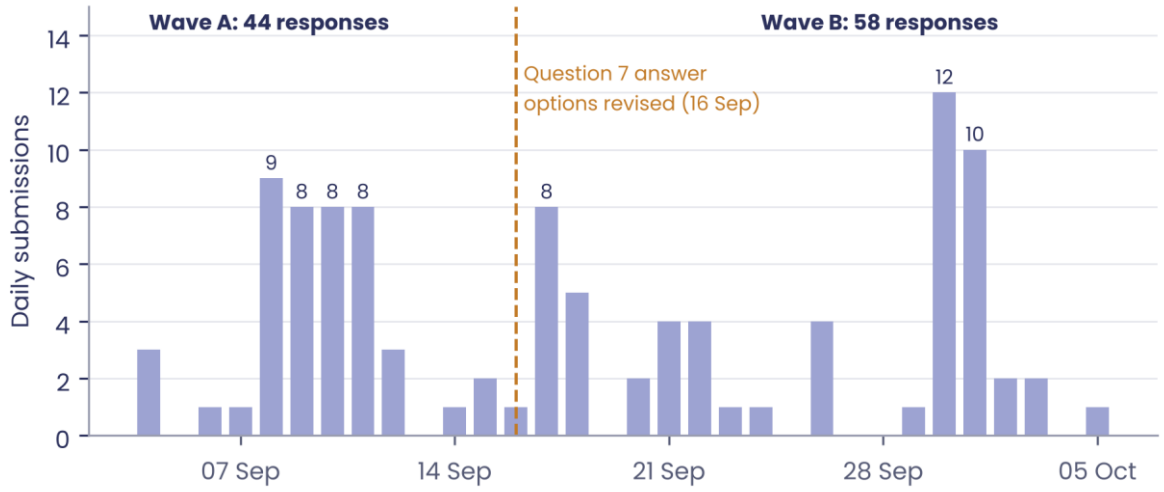

Figure 1. Daily survey submissions, 4 September – 5 October 2026 (n = 102)

On 16 September the answer options of the final question (Q7) were refined, as explained in Section 3.6. The 44 responses received before this change are referred to as **Wave A** and the 58 received after it as **Wave B**. All other questions stayed the same throughout data collection.

3.2. Analytical approach

Quantitative items are analysed with descriptive statistics. For each validation criterion, the share of positive answers is reported with a 95% confidence interval (Wilson score method). The survey is not a probability sample of the European GLAM workforce, so the intervals indicate the precision of the estimates and are not a claim of statistical representativeness. Results are compared across institution types, countries and partner affiliation to see whether validation holds across different settings. Open-ended answers were analysed with reflexive thematic analysis (Braun & Clarke, 2006). Comments were coded inductively, grouped into ten themes and linked to concrete recommendations. A sensitivity analysis compares respondents from consortium partner organisations with all other respondents, to check that the results are not driven by the project's own networks.

3.3. Respondent profile

The 102 respondents represent **more than 70 organisations** across the GLAM ecosystem (Figure 2). Libraries are the largest group (38; 37.3%), followed by museums (26; 25.5%) and archives (6; 5.9%). Almost a third of respondents (32; 31.4%) selected "Other". Galleries were not offered as a separate answer option, so gallery respondents could only be recorded under "Other". Analysis of their organisations shows that this group is not peripheral but part of the wider cultural value chain. It includes higher education and research institutions active in cultural management and heritage (14), cultural associations, foundations and public bodies (7), art market and fine-art service providers such as art logistics, insurance and a commercial gallery (6), consultancies (4) and one independent professional. The "Other" group therefore represents the "educational providers and industry professionals" that the application explicitly targets for validation.

Figure 2. Respondents by type of organisation (A) and composition of the "Other" category (B)

Respondents come from **12 countries** (Figure 3). Nine are EU Member States, two are EU candidate countries (Serbia, Bosnia and Herzegovina) and one is a non-European country (Australia). As expected for a consortium-led consultation, the four partner countries account for most responses: Latvia 34 (33.3%), Finland 23 (22.5%), Italy 22 (21.6%) and Serbia 14 (13.7%). The other eight countries contribute 9 responses (8.8%).

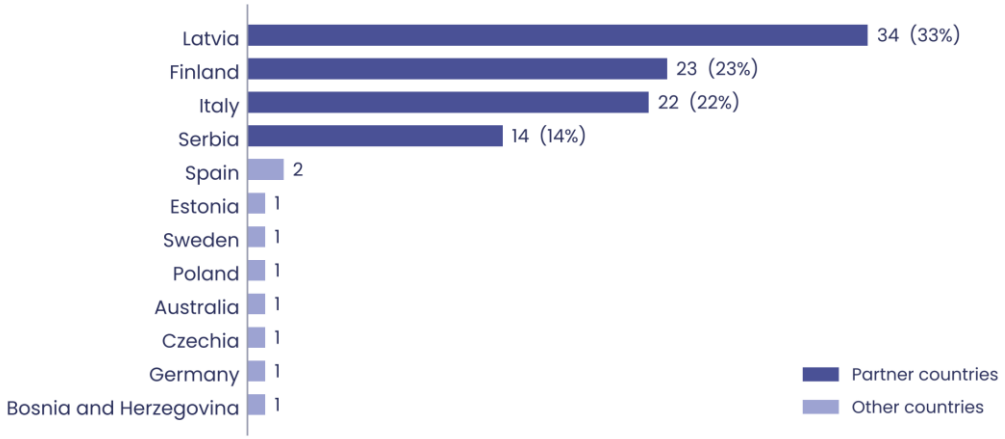

Figure 3. Respondents by country of organisation (n = 102)

Countries and institution types are closely linked (Table 5). The Latvian sample consists almost entirely of public libraries (30 of 34). Finnish respondents come mainly from museums (14 of 23). Italian and Serbian respondents are mostly in the "Other" category (14 of 22 and 11 of 14), reflecting the strong role of universities, heritage associations and fine-art service providers in these countries. Differences between countries should

therefore be read partly as differences between institution types, and the other way round.

Table 5. Respondents by country and type of organisation

Country	Library	Museum	Archive	Other	Total
Latvia	30	3	1	0	**34**
Finland	4	14	0	5	**23**
Italy	3	1	4	14	**22**
Serbia	0	3	0	11	**14**
Other countries (8)	1	5	1	2	**9**
Total	**38**	**26**	**6**	**32**	**102**

Twenty-nine respondents (28.4%) work in consortium partner organisations: 11 at the Forum Marinum Foundation, 9 at Jelgava City Library and its branches, 5 at Humak University of Applied Sciences and 4 at the University of Novi Sad. The other 73 respondents (71.6%) are external stakeholders reached through partners' networks.

3.4. Results by validation criterion

The framework received strong positive ratings on all five core criteria (Figure 4). Two criteria exceed the 90% benchmark: the framework as a basis for training (94.1%) and its overall validity (91.2%). Completeness and relevance come close (88.2%). Clarity and the level model each reach 82.4%. Practical applicability is clearly lower (74.5%), and its confidence interval lies entirely below 90%. Almost six in ten respondents (59; 57.8%) answered "Yes" to all five core criteria, and 80 (78.4%) answered "Yes" to at least four (Figure 10, Section 3.7).

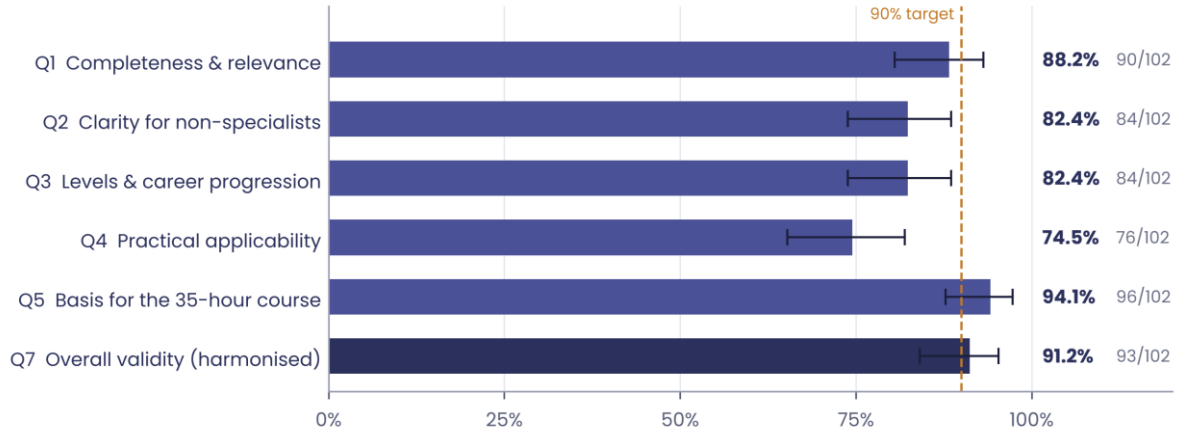

Figure 4. Share of positive answers by validation criterion, with 95% confidence intervals (n = 102)

3.4.1. Completeness and relevance (Q1)

90 of 102 respondents (88.2%; 95% CI 80.6–93.1%) agree that the 31 competencies and four domains cover what GLAM professionals need for ESG work. This is strong confirmation that the evidence-based design of the framework, grounded in the needs analysis, captures the main ESG competency areas of the sector. Agreement is almost unanimous among libraries (97.4%) and respondents from Latvia (97.1%) and Serbia (100%). It is lower among museums (76.9%) and Finnish respondents (73.9%).

Most of the twelve critical answers do not say that something essential is missing. They ask for a **leaner and more consistent structure**. Four museum respondents note that some competencies are worded similarly or overlap and could be combined, and that the competencies "do not seem to be consistent in scope. Some are broad themes, while others focus on very specific details" (museum respondent, Finland). One respondent points out that the framework document refers to both 29 and 31 competencies, because the needs analysis assessed 29 competencies and two more were added from the qualitative research. They recommend stating this distinction explicitly and using it consistently.

A few respondents suggest additional content. Suggestions include the transformative role of museums as "future makers" that shape audiences' sustainable behaviour, legal qualifications, inter-institutional cooperation ("how the other libraries work – how can we work together"), and the emotional and human dimension of art-based practice.

One respondent notes that environmental emergency preparedness is less critical in the Finnish context but agrees that it should stay because of its importance elsewhere. This shows that national contexts affect how relevant each competency appears.

3.4.2. Clarity of descriptions and examples (Q2)

84 respondents (82.4%; 95% CI 73.8–88.5%) find the competency descriptions and practical examples clear enough for non-ESG specialists. Archives (100%), Latvian (91.2%) and Serbian (92.9%) respondents rate clarity highest. Museums (65.4%) and Finnish respondents (60.9%) rate it lowest.

The critical comments form one of the most consistent patterns in the dataset. Respondents describe the language as too technical or academic for practitioners without prior ESG knowledge. They ask for more concrete examples that reflect the real resources of GLAM organisations:

> "The language is still too technical for someone without prior knowledge of ESG. […] Accessibility of language is essential to make the tool engaging and inclusive rather than discouraging to use." *(museum respondent, Finland)*
>
> "From the perspective of a small Finnish public library, staff are very practice-oriented. They may already support ESG values and apply them in everyday work, but the terminology is mainly understandable to those already familiar with ESG." *(library respondent, Finland)*
>
> "In some cases, the examples appear more aspirational than reflective of the actual resources, roles, cultural context, and practical and organisational constraints of GLAM organisations." *(respondent, Italy)*

Other respondents ask for visual summaries such as graphics and diagrams, and for closer alignment between competency titles and their descriptions. One respondent observes that the density of the document is "its biggest strength and weakness at the same time". Readers who imagine their own organisation in every box can "feel overload". Comments on language and English-language terminology also show that partner-language versions are needed, as the application already foresees.

3.4.3. Progression levels and career paths (Q3)

84 respondents (82.4%; 95% CI 73.8–88.5%) agree that the five levels (L1–L5, EQF 3–8) match real GLAM roles and careers. Q3 nevertheless received 17 explanatory comments, the second-highest number after Q4. This shows that the level model strongly engages practitioners' professional experience. Agreement is high among libraries (92.1%) and in Latvia (91.2%) and Serbia (100%), and lower among museums (69.2%), archives (66.7%) and Finnish respondents (65.2%).

The comments raise three issues:

- **Linearity of the model.** Expertise, managerial responsibility and EQF level do not necessarily coincide. A professional may stay at L1 throughout their career and still have deep expertise, while a newly appointed director may be at L5 but new to the GLAM field. Respondents ask the framework to state that the EQF mapping is **indicative rather than one-to-one** and that "competence maturity should not be equated with formal qualification level" (museum respondent). One respondent suggests organising training around job functions and self-selected learning needs rather than career level.
- **Coverage of roles.** Respondents point to roles that are missing from the level descriptors, including producers, project managers, educators and mediators, guides, audience engagement, communication and digital staff, collections staff and technical staff. Respondents from the art services sector add fine-art logistics specialists, art handlers, packing and crating specialists, and customs and shipping professionals. One respondent notes that "in archives, job duties and competences do not always correspond precisely to the general L1–L5" (translated).
- **Organisational scale.** In small institutions, "which most museums are", not all five levels exist. In very small teams, L2 and L3 can hardly be told apart. One respondent notes that the top level may sit outside the GLAM unit, at the level of the parent organisation such as a university.

3.4.4. Practical applicability (Q4)

76 respondents (74.5%; 95% CI 65.3–82.0%) expect that their institution can apply the framework in practice, for example in job descriptions, staff training, self-assessment or strategic planning. This is the lowest score among the five criteria, and it shows the widest gap between libraries (84.2%) and museums (57.7%). Of the 26 respondents who answered "No", 20 explained the main obstacle, making this the most commented question.

The barriers are mainly **operational rather than conceptual**. Ten respondents name limited time, financial resources or staff ("Staffing levels have been cut so drastically that it is impossible to undertake this"; "As a small museum our resources are limited"). Others point to organisational readiness: a lack of ESG culture, insufficient understanding among colleagues, or resistance to changing the status quo. One respondent warns that an already overworked workforce may end up using the framework as a "tick-a-box type of tool". In a large library, ESG responsibilities are spread across separate departments (facilities, development, collections), which makes integration possible "but not easily".

Several respondents propose concrete solutions. They ask for a **simpler entry point for small and medium-sized institutions**, such as "a concise and clearly structured guide, and perhaps a checklist (with a brief explanation of each item)". They also ask for an "easy toolbox for every layer" and easy access to the tools and training packages referred to in the framework, which some could not yet find on the website. These requests match closely what the ESG Knowledge Box (WP3) is designed to provide.

3.4.5. The framework as a basis for training (Q5)

96 respondents (94.1%; 95% CI 87.8–97.3%) agree that the framework is a useful and solid basis for the upcoming 35-hour ESG4GLAM training course. This is the highest level of agreement in the survey and it is consistent across groups. All Latvian, Serbian and "other country" respondents agree, as do 96.2% of museum professionals, even though museums were the most critical group on the other criteria. Respondents who doubt that their institution can implement the framework still see its value as a **learning framework**. This supports the project's plan to use it first as the backbone of the training course and the ESG Knowledge Box.

3.5. Training priorities

Q6 asked which ESG domain the training course should prioritise first. 96 respondents answered, and 29 of them chose more than one domain. **Cross-Cutting competencies** are the clear first priority: they are mentioned by 49 respondents (51.0%) and are the most frequent single choice (27 of 67; 40.3%). **Social competencies** come second (40 mentions; 41.7%). Environmental (24; 25.0%) and Governance (23; 24.0%) competencies are mentioned less often (Figure 5).

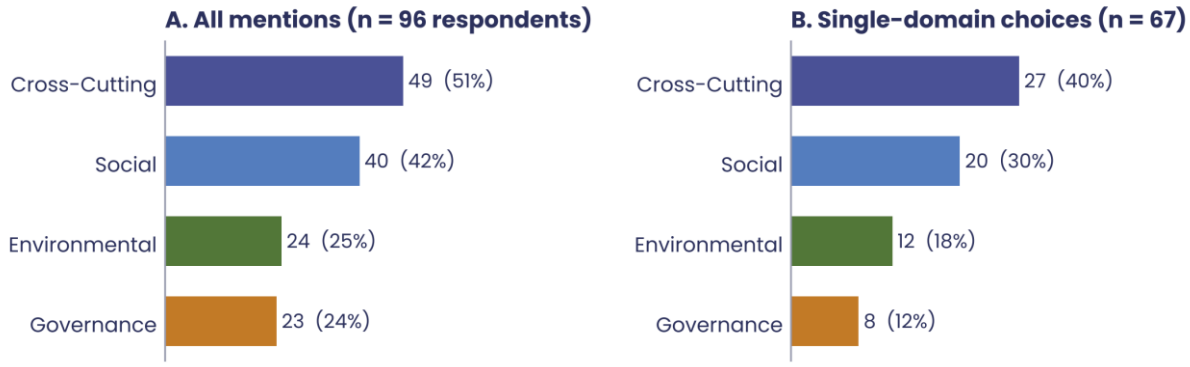

Figure 5. Domains the training course should prioritise first: all mentions (A) and respondents choosing a single domain (B)

Comparing these priorities with the competency gaps measured in the needs analysis gives a useful insight (Table 6). Both sources agree that Cross-Cutting competencies, such as basic ESG literacy, links between E, S and G, and digital sustainability, are the foundation: they show the largest gap and are the most requested starting point. The Social domain, however, had one of the smallest measured gaps, yet ranks second as a training priority. This is mainly driven by libraries, which mention Social competencies as often as Cross-Cutting ones (18 each) but name Environmental competencies only twice. Museums and archives give Environmental competencies relatively more weight. Training priorities therefore reflect the core public-facing mission of each institution type as well as measured gaps. This supports a common foundation followed by differentiated learning pathways.

Table 6. Training priorities (validation survey) compared with competency gaps (needs analysis)

Domain	Gap score (needs analysis)	Gap rank	Mentions as first priority (n = 96)	Priority rank	Libraries / Museums / Archives / Other
Cross-Cutting	1.68	1	49 (51.0%)	1	18 / 10 / 4 / 17
Environmental	1.51	2	24 (25.0%)	3	2 / 8 / 4 / 10
Social	1.26	3	40 (41.7%)	2	18 / 8 / 3 / 11
Governance	1.25	4	23 (24.0%)	4	9 / 3 / 3 / 8

3.6. Overall validity of the framework

Q7 asked respondents whether the framework, overall, is a valid reference tool for the European GLAM sector. During data collection, the answer options were refined to separate unconditional endorsement from endorsement subject to adjustments. This makes the question more useful for the revision of the framework. Table 7 shows both versions and how they were harmonised for analysis.

Table 7. Answer options of Q7 in the two survey waves and harmonisation

Wave A (4–15 Sep; n = 44)	Wave B (16 Sep – 5 Oct; n = 58)	Harmonised category
"YES – I fully endorse it." (36)	"YES, completely – It provides a clear, reliable, and comprehensive standard for European GLAM institutions." (34)	Endorse – without reservation (70)
—	"YES, but requires adjustments – It is a solid foundation, but needs revisions or further integrations to be fully effective." (23)	Endorse – with adjustments (23)
"NO – I do not endorse it in its current form." (8)	"NO – It does not adequately address the operational realities or practical needs of the sector." (1)	Do not endorse (9)

Across both waves, **93 of 102 respondents (91.2%; 95% CI 84.1–95.3%) endorse the framework** as a valid reference tool, and 9 (8.8%) do not (Figure 6). Seventy respondents (68.6%) endorse it without reservation and 23 (22.5%) subject to

adjustments. In Wave B, where respondents could choose conditional endorsement, 39.7% did so. This is a more realistic picture of the framework's status: it is a solid foundation that should be refined, which is the purpose of this validation.

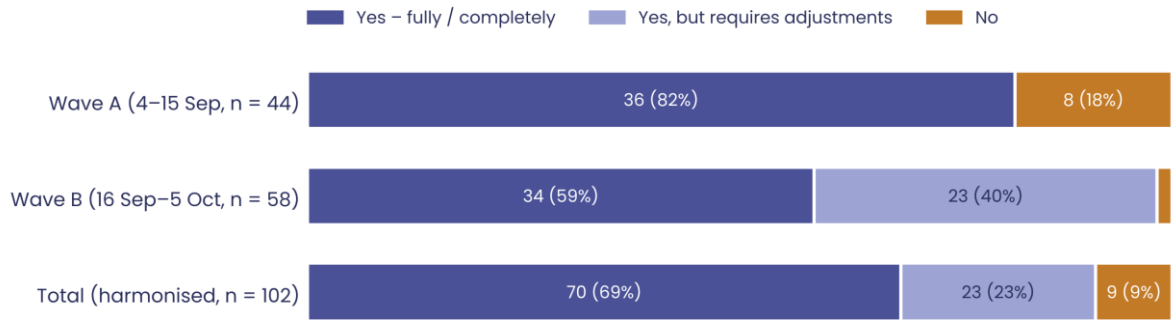

Figure 6. Overall validity of the framework by survey wave and in total

The endorsement rate is higher in Wave B (98.3%) than in Wave A (81.8%). Part of this difference is probably due to the added middle option: some respondents who would have said "No" to an all-or-nothing question chose conditional endorsement instead. However, the core criteria Q1–Q5, which did not change, were also rated higher in Wave B. This means the difference also reflects a different mix of respondents, e.g. 13 of the 14 Serbian responses and most museum responses arrived in Wave B. Because the 90% target is met only narrowly on the harmonised measure, the result should be described as **meeting the target** and not as clearly exceeding it.

The nine respondents who do not endorse the framework are not a uniform group. Five work in Finland and two each in Italy and Latvia. Four of the nine nevertheless answered "Yes" to at least three of the five core criteria, and one answered "Yes" to all five. Their rejection therefore seems to concern the framework's current form, especially its complexity and applicability, rather than its content.

3.7. Differences across respondent groups

Validation is meaningful only if it holds across the settings in which the framework will be used. Figure 7, Figure 8 and Figure 9 show positive response rates for each criterion by institution type, country and partner affiliation.

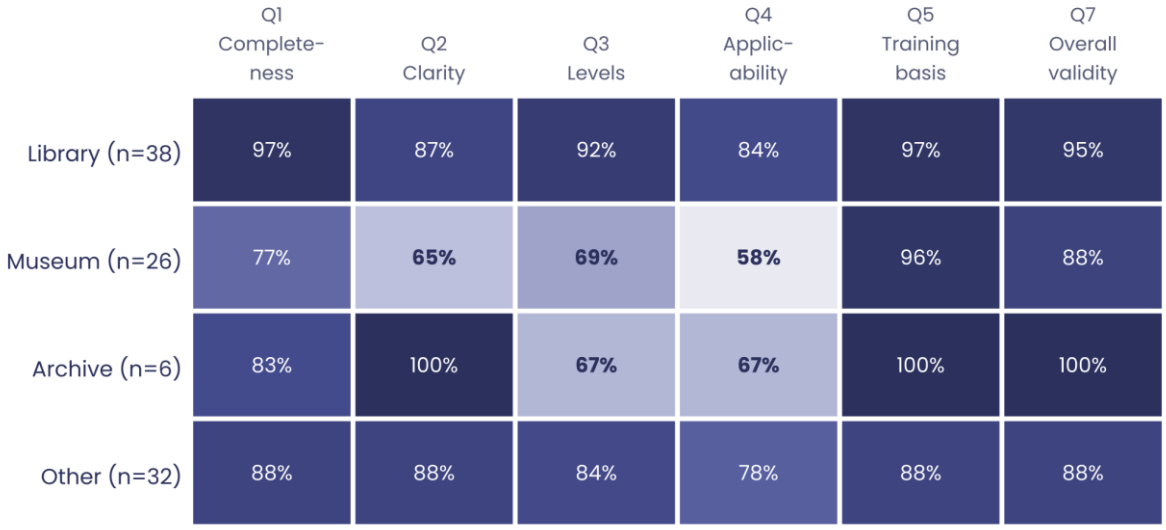

Figure 7. Positive answers by validation criterion and type of organisation (%)

By institution type. Libraries are the most positive of the larger groups, with 84–97% on every criterion. Museums are the most critical on content-related criteria, especially applicability (57.7%), clarity (65.4%) and levels (69.2%). Yet they almost unanimously endorse the framework as a basis for training (96.2%) and, overall, as a valid reference tool (88.5%). Half of all museum respondents (13 of 26) chose conditional endorsement. This is the strongest signal that the museum community supports the framework in principle but expects refinements. The small archive group (n = 6) rates clarity, training potential and overall validity at 100%, and the levels and applicability at 66.7%. Respondents in the "Other" group give consistent ratings of 78–88%.

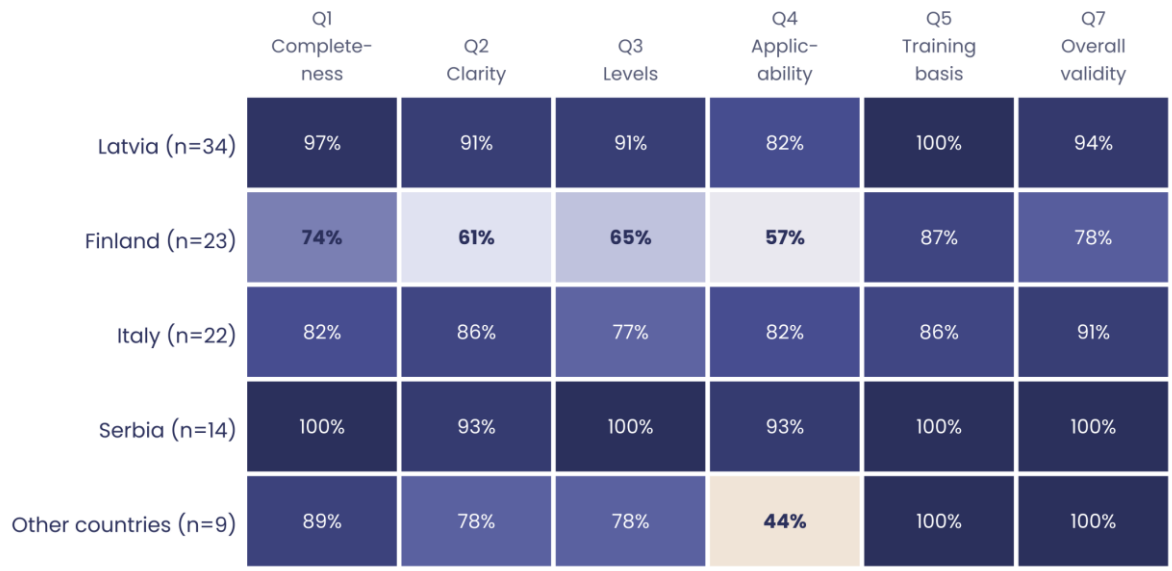

Figure 8. Positive answers by validation criterion and country of organisation (%)

By country. Serbian (93–100%) and Latvian (82–100%) respondents give the highest ratings, and Italian respondents rate all criteria between 77% and 91%. Finnish respondents are clearly the most critical group, with 56.5% on applicability, 60.9% on clarity and 78.3% overall endorsement. Most Finnish respondents are museum professionals, and their open comments are among the most detailed and constructive in the dataset. They show a mature, practice-oriented sustainability culture that holds the framework to high standards of usability. Among the nine respondents from other countries, only 4 (44.4%) expect practical application, although all nine endorse the framework overall.

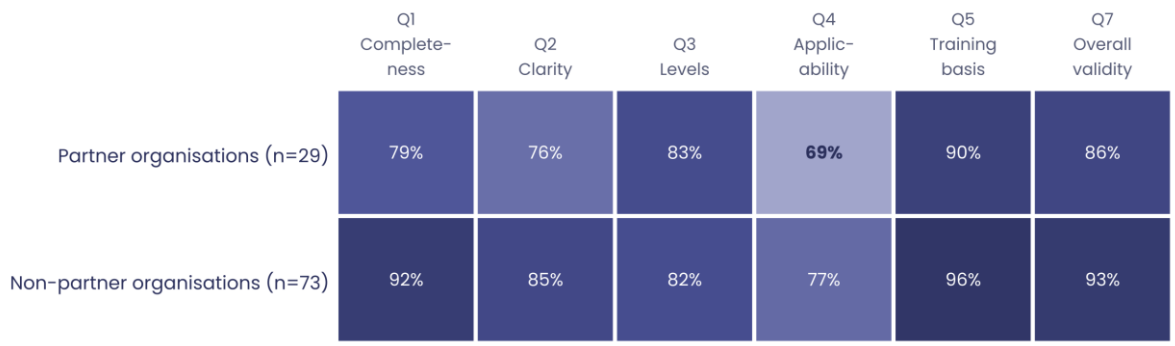

Figure 9. Positive answers by validation criterion: partner and non-partner organisations (%)

Partner versus external stakeholders. A common concern about consortium-distributed surveys is that partners' own staff may inflate positive results. The data show the opposite. Respondents from partner organisations (n = 29) are **more critical** than external stakeholders (n = 73) on four of the five core criteria and overall (86.2% against 93.2% endorsement). Excluding partner staff therefore increases the approval rate. This is strong evidence that the validation result is not an artefact of the project's own networks.

Consistency of judgements. Figure 10 shows how many of the five core criteria each respondent answered positively. Fifty-nine respondents (57.8%) are positive on all five, and a further 21 (20.6%) on four. Only ten respondents (9.8%) are positive on two or fewer criteria, which shows that broad rejection is rare.

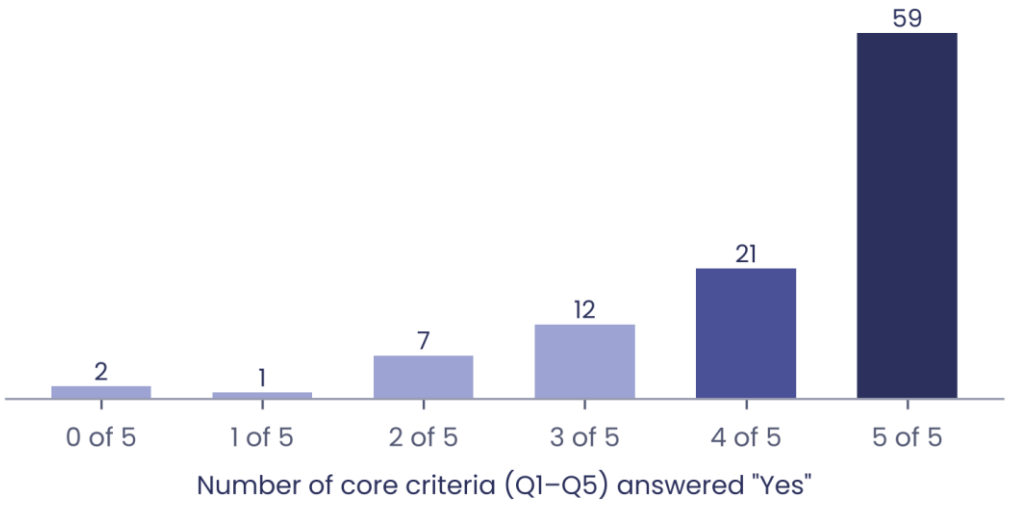

Figure 10. Number of core validation criteria (Q1–Q5) answered positively per respondent (n = 102)

3.8. Thematic analysis of open-ended feedback

The 56 written comments from 33 respondents were coded into ten themes (Figure 11, Table 8; coding frame in Annex 2). One comment could be coded under more than one theme. The themes show a consistent picture. Stakeholders mostly accept **what** the framework contains, and their concerns are about **how** it is presented and how it can be used with limited resources.

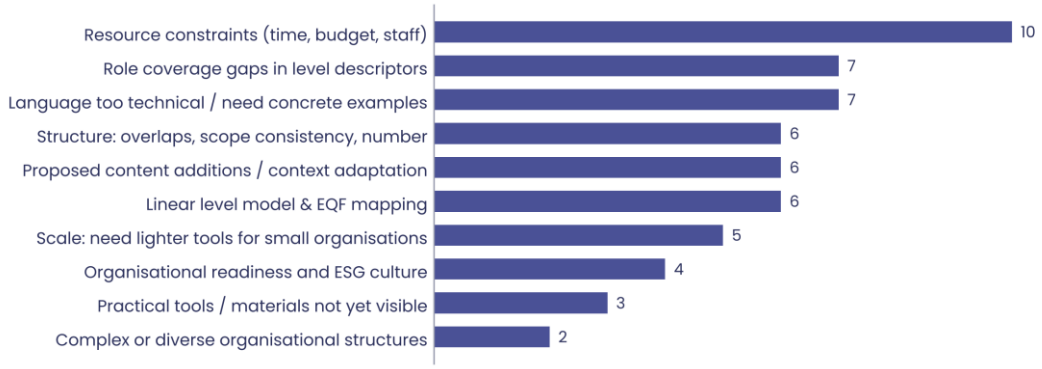

Figure 11. Themes in open-ended feedback (number of respondents mentioning each theme)

Table 8. Main themes in open-ended feedback and their implications

Theme (respondents)	What respondents say	Implication for the framework / WP3
Resource constraints (10)	Lack of time, budget and staff; small teams already overstretched	Modular, low-threshold uptake; show quick wins and low-cost actions
Role coverage gaps (7)	Educators, producers, technical, collections, art-logistics and archive roles not visible in level descriptors	Broaden example roles; add a role-mapping annex
Language and examples (7)	Too technical or academic; English terminology; examples aspirational	Plain-language edition, glossary, realistic small-institution examples, translations
Structure and consistency (6)	Overlapping competencies; uneven scope; title–description mismatches; 29 vs 31	Editorial consolidation; consistent structure and naming
Content additions and context (6)	Museums as agents of change; legal aspects; inter-institutional cooperation; human/emotional dimension; national context	Address in descriptions and examples; national adaptation notes
Linear level model and EQF (6)	Expertise ≠ hierarchy ≠ EQF; non-linear careers	State that the EQF mapping is indicative; describe levels by ESG responsibility
Scale of organisation (5)	Framework heavy for small and medium institutions; not all levels exist	Simplified "core" pathway and checklist
Organisational readiness (4)	Weak ESG culture; resistance to change; risk of box-ticking	Strengthen change-management content (CC-03, CC-04)

Theme (respondents)	What respondents say	Implication for the framework / WP3
Practical tools (3)	Referenced tools and packages hard to find; need a toolbox	Link framework to the ESG Knowledge Box
Organisational structures (2)	ESG responsibilities spread across departments; diversity of organisations	Guidance for cross-departmental ESG roles

4. Validation focus groups (Part 2)

Part 2 presents the ten focus groups that the five partner institutions organised between 8 and 23 September 2026. They complement the online survey in Part 1 (Section 3): the survey shows how widely the framework is endorsed, and the focus groups show why, and what should change. Findings are organised by theme, not by partner. Each focus group is cited by a short code (for example HU-1 for the first Humak session); Section 4.1 explains the codes. Section 4.6 compares the focus group findings with the survey results.

4.1. Organisation and participants

Five partner institutions in four countries each organised two focus groups between 8 and 23 September 2026. Table 9 summarises the ten sessions; participant numbers exclude moderators and note-takers (see the note below Table 9).

Version of the framework. The partners confirmed in October 2026 which materials their participants received. Participants had access to both the full and the shorter (core) version of the framework, as follows.

1. **Humak** sent the longer and the shorter version to all participants in advance and encouraged them to read either one, depending on their time, and shared the link to the framework on the ESG4GLAM website. The slide presentation was adapted separately for the in-person and the online group.
2. **Forum Marinum** gave each participant a printed copy of the framework included in the focus group guide, together with the Levels of Competency table. A link to the framework was shared in advance, so that participants could review the summary on the website, the shorter overview and the full framework document. A slide presentation was used in the sessions.
3. **Jelgava City Library** sent both the short and the full version to all participants in advance. Both groups were held online; the facilitators shared their screen and used a slide presentation to show the competencies and their descriptions.

4. **Mazzini Lab** shared the full version and the core version with all participants, together with the dedicated framework webpage, which was also used during the meetings as a visual reference.

The slide presentations are in the shared project folder, next to the focus group reports. The version used in UN-1 and UN-2 has still to be recorded by UNS. Some comments cite sections and level descriptors that are not in the core version (see Section 4.2). This is consistent with participants having consulted the full version, but the comments must be checked against it before the level-related recommendations R1 and R2 are made final. Both stay marked provisional until then, which is the first of the next steps in Section 4.7.

Table 9. Focus groups conducted, by institution

Code	Partner, country	Date (2026)	Format	Participants	Participant profile
HU-1	Humak, Finland	10 Sep	In person	2	Museum-training expert from the national museums association; visual arts association and gallery representative
HU-2	Humak, Finland	16 Sep	Online	3	City library professional; cultural-policy and museology researcher; freelance heritage researcher
FM-1	Forum Marinum, Finland	8 Sep	In person	5	Museum staff: curators, educators, communications, audience engagement, customer service
FM-2	Forum Marinum, Finland	11 Sep	In person	3	Two museums (city and foundation-run). The report lists a curator, an audience-engagement head and two development heads; this list includes the facilitator
JC-1	Jelgava City Library, Latvia	9 Sep	Online	5	Library and museum professionals from national, municipal and regional bodies; senior managers; competence development specialists; international network representative
JC-2	Jelgava City Library, Latvia	9 Sep	Online	5	Library, museum and archive professionals from municipal and regional bodies; senior and branch

Code	Partner, country	Date (2026)	Format	Participants	Participant profile
					managers; methodological and sector-development staff
MZ-1	Mazzini Lab, Italy	11 Sep	Online	2	Business-school sustainability lecturer; regional economist advising on public-administration governance (neither works in a GLAM institution)
MZ-2	Mazzini Lab, Italy	15 Sep	Online	3	Heritage restorer and conservation lecturer; ESG/CSR accountant and lecturer; cultural manager and impact evaluator
UN-1	University of Novi Sad, Serbia	23 Sep	In person	3	Participants working on curriculum and micro-credential design (one in higher education); sub-sector and institution size not stated
UN-2	University of Novi Sad, Serbia	18 Sep	In person	3	Festival PR coordinator; two participants who did not state role or institution
Total	**5 institutions, 4 countries**		**5 in person, 5 online**	**34**	

Participant numbers exclude moderators and note-takers. Forum Marinum clarified the roles in October 2026: FM-1 had five participants and two facilitators (a moderator and a note-taker, who also took part in the discussion); FM-2 had three participants and one facilitator, who acted as both moderator and note-taker. The original Forum Marinum reports gave 7 and 4, which are participants plus facilitators; Table 9 uses the corrected figures. Jelgava City Library confirmed that JC-1 and JC-2 involved ten different participants, with no overlap between the groups. At Mazzini Lab the same facilitator led both sessions and a second team member took the notes.

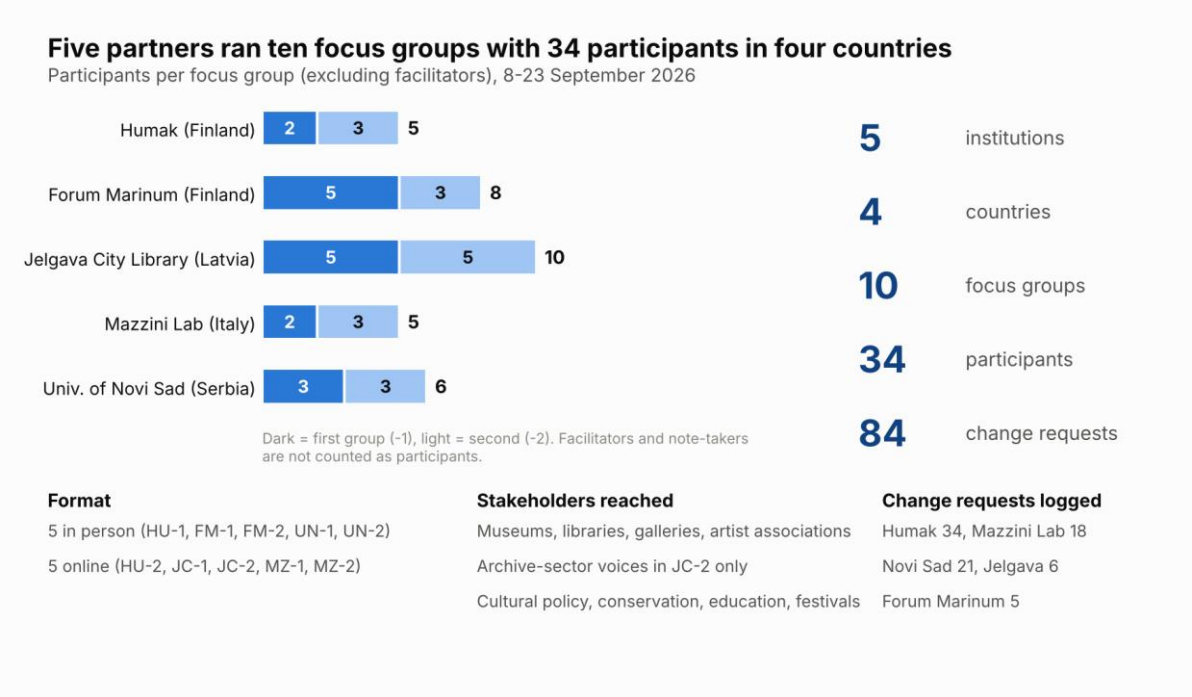

Figure 12. Validation overview: partners, focus groups, participants and change requests

Finland supplied four of the ten groups and 13 of the 34 participants; Forum Marinum alone supplied 8. Facilitators and note-takers are not counted (see the note to Table 9).

Who took part. Museum professionals were the largest group (HU-1, FM-1, FM-2, JC-1, JC-2, plus museum-sector members of HU-2). Libraries were represented in HU-2, JC-1 and JC-2. Galleries and artist associations appeared in HU-1, and archive-sector participants are explicitly reported only in JC-2. Cultural-policy, conservation, education and consultancy perspectives came mainly from MZ-1, MZ-2, HU-2 and the Serbian groups. UN-2 included a festival PR coordinator. The other two UN-2 participants gave no role or institution, and MZ-1 and MZ-2 consisted of academics and consultants rather than GLAM practitioners, so the practitioner-based part of the evidence comes from at most six groups (HU-1, HU-2, FM-1, FM-2, JC-1, JC-2). All five Humak participants (HU-1 and HU-2) had also contributed to the earlier needs analysis.

4.2. Methodology, analysis and limitations

Organisation. All partners used one reporting template from the University of Novi Sad. It asks the same five questions in every session, then an open closing question: Q1 completeness and relevance, Q2 clarity, Q3 levels and progression, Q4 use in practice, and Q5 priorities and uptake (including which competencies a first course should cover). Reporters also log each requested change in a separate table row with a competency code, type of change and priority. The framework was sent in advance in every case. Where durations are reported, sessions lasted from just under one hour (MZ-1) to over 90 minutes (HU-1). Several partners opened with a short presentation, summary slides or an explainer video.

Analysis. Each report was read in full and its findings were coded to a theme, a competency code and a focus group. A finding counts as *prominent* when a report lists it as a key finding, a change request, or a view of at least two participants. It counts as *individual* when one participant raised it. Frequencies are reported separately for focus groups, partners and participants. Counting groups is a descriptive device, not a statistical measure (see Method transparency below). The 84 logged change requests (Humak 34, Mazzini Lab 18, Serbia 21, Forum Marinum 5, Jelgava 6) were grouped into the recommendations in Section 4.4. Silence on a competency is not read as approval: no report discusses ENV-04 or SOC-08.

Data source. The analysis is based on the ten partner-written focus group reports, one per session, on the common template. It is not based on transcripts, recordings or attendance lists. Findings are therefore as reported and summarised by each partner.

Counting and weighting. Counting groups is a descriptive device, not a statistical measure. The categories prominent, partial, individual, related and moderator are not weighted equally: a prominent finding is a key finding, a change request or the view of at least two participants; partial and individual findings rest on one participant; related points are indirect; moderator suggestions carry less weight than participant evidence. Figures 13 to 15 and Tables 10 to 14 do not add these categories into a single score.

Limitations of the focus group evidence

- **Small, purposive samples.** With 34 participants, counts show the breadth of support, not its prevalence in the sector.
- **Uneven weight.** Finland supplied four of ten groups and 13 of 34 participants. Flat, small-organisation concerns are therefore likely to be over-represented relative to Italy or Serbia.
- **Different formats.** FM-1 was dominated by a few voices. MZ-1 and MZ-2 involved academics and consultants, not GLAM staff, and MZ-1 was deliberately critical.
- **Uneven reporting.** Humak, Serbian and Mazzini Lab reports are detailed; Forum Marinum reports are brief (five change requests in total). Priorities were rated by the group in some reports and not in others. The UN-2 report gives no date (confirmed separately by UNS as 18 September), and the Serbian evidence section is blank.
- **Possibly different materials.** Some comments cite framework sections (4.2, 4.4), an Appendix A glossary and level-specific descriptors that are not in the 22-page core PDF supplied for this synthesis, while MZ-1 described the level descriptions as one line each. The partners have since confirmed that participants received both the core and the full version and, in most groups, slides (Section 4.1), which may explain these references. The comments still have to be checked against the full version before the level-related recommendations (R1, R2) are made final; both stay provisional until then.
- **Perceptions, not tests.** The groups reviewed the document; no one applied it. The framework's statement that it will be "validated by 100+ stakeholders" cannot rest on this evidence alone.
- **Minor points.** JC-1 and JC-2 were held on the same date; Jelgava City Library has confirmed that the two groups involved ten different participants, with no overlap. HU-1 reports that its transcript was processed in three stages: the moderator first checked and filtered the transcript text and corrected misspelled words and names; the content was then summarised with an AI tool (Claude Pro); and the moderator finally checked the AI-assisted summary against the transcript for consistency.

4.3. Key findings from the focus groups

The findings fall into eight themes. For each, the text gives the consolidated result, how widely it was shared (in focus groups and partners), where views differed, and what it means for the framework. Figure 13 shows how often each theme appeared, group by group.

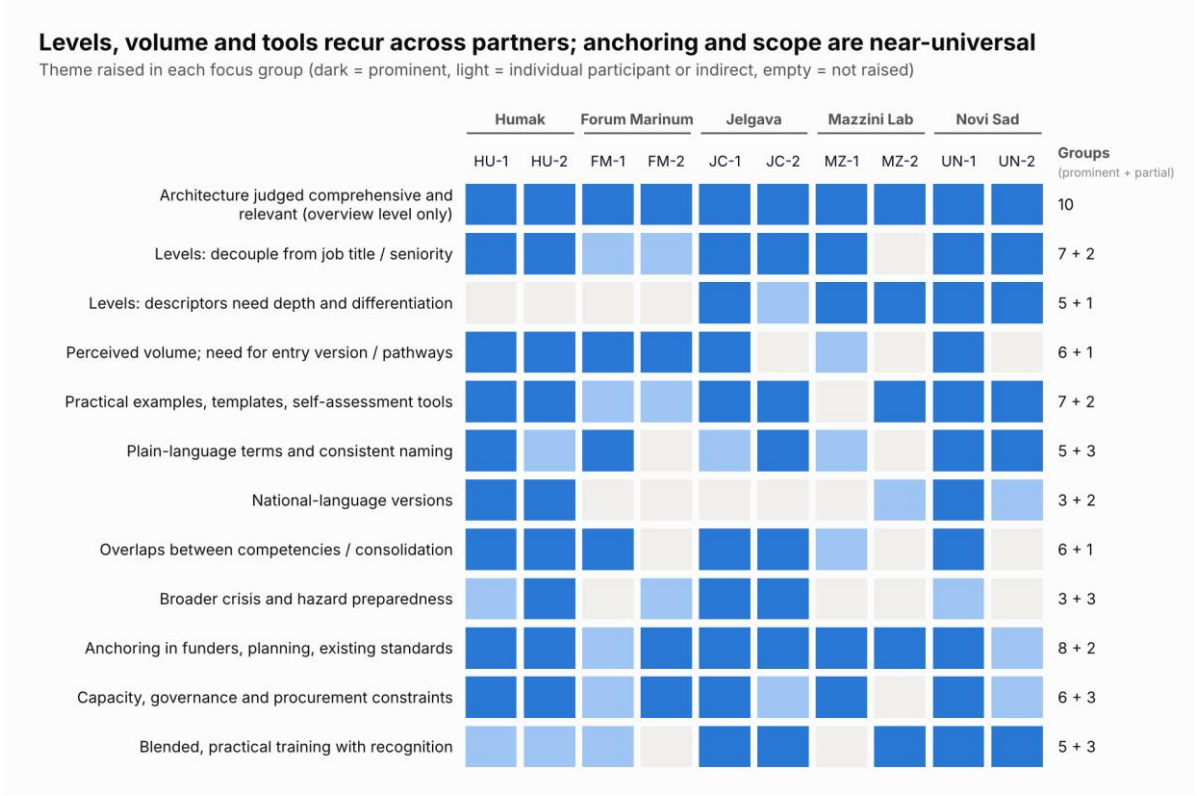

Figure 13. Thematic feedback matrix: themes raised in each focus group

Note: the first row records an architecture-level judgement (four domains, 31 competencies) at overview level. It does not mean that every competency was reviewed: ENV-04 and SOC-08 were not discussed and several others were mentioned only in passing. Practitioner-based support comes from at most six groups (HU-1, HU-2, FM-1, FM-2, JC-1, JC-2).

The architecture is judged relevant and comprehensive at overview level by all ten groups, and anchoring in funders, planning and standards is near-universal. Levels, volume, examples and overlaps each recur across at least four partners, whereas crisis preparedness and national-language versions cluster in two partners each.

4.3.1. Scope and relevance: strong convergence, with a case still to be made

All ten groups judged the architecture (four domains, 31 competencies) comprehensive and relevant at overview level, across all five partners. This is a judgement of the architecture, not a competency-by-competency review: ENV-04 and SOC-08 were not discussed in any report, and several others (for example ENV-06, SOC-05, SOC-07, GOV-01 and GOV-08) were mentioned only in passing. Practitioner-based support comes from at most six groups (HU-1, HU-2, FM-1, FM-2, JC-1, JC-2): MZ-1 and MZ-2 consisted of academics and consultants rather than GLAM practitioners, and two UN-2 participants gave no role or institution. In HU-1 the museum-training expert said she had looked specifically for gaps and found none. MZ-1 called the architecture complete, balanced and well justified. Nobody asked for a competency to be removed as irrelevant, and no group asked for a new domain.

Participants valued three features in particular:

- **A sector-native, evidence-based design.** HU-2 praised it for not copying corporate ESG. UN-1 called its grounding in the sector's own evidence and language its strongest asset and asked that this be preserved in all derived tools. MZ-1 praised the "culture first" approach.
- **The whole-organisation principle.** HU-1 strongly endorsed CC-03 because certification schemes often leave one person doing the work while the institution learns nothing.
- **CC-04 (beyond the checkbox).** HU-2 called it a favourite of all 31 competencies (two participants), and MZ-2 recommended stressing "ESG as philosophy, not checkbox" throughout.

The qualifications concern relevance in practice rather than scope. HU-2 considered whether the framework is too museum-centred; the library professional said most of it applies to libraries, yet the group still asked for more library and small-institution examples. FM-2 stressed that a city museum's governance is shaped by the city, which already supplies risk and sustainability models, so it may use the framework only nominally. One FM-2 participant asked what good the framework achieves for the world

if completed. MZ-1 added that central and local public bodies differ: large museums have budgets and recruit by competition; a small municipal library does not.

Implication. Keep the four-domain, 31-competency architecture in the next version. The work ahead is to show the framework's added value over standards institutions already follow, and to protect its sector-native character.

4.3.2. Levels L1–L5: the most contested element

Every one of the ten groups raised at least one point on the levels. The idea of progression was accepted in principle by six groups (FM-2, JC-1, JC-2, MZ-1, UN-1, UN-2), but the current form was challenged on four fronts.

Position is not competence. Seven groups (HU-1, HU-2, JC-1, JC-2, MZ-1, UN-1, UN-2; four partners) asked that levels reflect actual function or proficiency rather than job title or seniority, and two more (FM-1, FM-2) made related points. HU-1 reported that a director may know nothing about sustainability while an entry-level employee knows a great deal, and that Finnish GLAM organisations rarely have more than three or four levels. A participant in JC-1 noted that in a small institution one person may work "perhaps even from L1 to L4". All three UN-1 participants and all three UN-2 participants asked that assessment produce a different level per competency. HU-2 proposed borrowing the Common European Framework of Reference for Languages (CEFR) scale (A1–C2) per competency, or showing levels as a matrix or circle.

Differing views. Fit depends on context rather than sub-sector. The HU-2 library professional said hierarchy can work if levels are not read as cumulative, and one UN-1 participant found the structure matched real career paths and job grades. One MZ-1 participant noted that Italian public administration is organised by function (operatore, assistente, funzionario, dirigente), not by the role clusters in the framework. HU-1 warned that ranked labels may alienate staff in flat organisations, where people do not want to say "I am here and you are there".

Descriptors lack depth. Five groups (JC-1, MZ-1, MZ-2, UN-1, UN-2; three partners) found the level descriptions too brief or too alike. MZ-1 reported them as one line each. MZ-2 found L4 and L5 hard to tell apart and noted that L5 ("define sector standards") reads as organisational rather than individual. UN-1 found that L4–L5 descriptors sound alike

across competencies and asked the framework to separate individual competence from institutional maturity. JC-1 observed that the matrix assigns the same L1–L5 / EQF 3–8 range to every competency, so progression within a competency is unclear. FM-1 suggested dropping the repeated EQF row because it makes the matrix look heavier, and UN-1 asked for the EQF to be presented as learning outcomes rather than as rank. The validity of the EQF mapping itself (L1–L5 to EQF levels 3–8) was not assessed by any group (HU-1 stated this explicitly), so it is neither validated nor challenged; only its presentation was commented on, by UN-1 and FM-1 (see R1 and R3).

L1 is contested. JC-1, JC-2, UN-2 and FM-2 valued L1 for technical and support staff, volunteers and customer-facing employees. FM-2 and FM-1 asked whether L1 needs a content-heavy course, or whether the range of experience at that level calls for a rethink. UN-1 asked for the ENV-07 L1 descriptor to be strengthened for front-of-house staff.

Alternatives offered. Proficiency scales per competency (HU-2); self-assessment that builds an individual path (HU-1, UN-1, UN-2); a baseline-versus-role-specific split (HU-1); function-based levels (JC-1, JC-2); and non-sequential access in the course, so that a tedious early level does not put learners off (MZ-2).

Implication. The level structure is not validated in its current form. The next version should define levels by responsibility, autonomy and observable evidence, treat job titles as illustrative, produce competency profiles rather than a single level, and give each competency distinct descriptors. Participants received both the core and the full version (Section 4.1), so the descriptor requests should first be checked against the full version. R1 and R2 are therefore provisional pending the version check (Section 4.7, Next step 1).

4.3.3. Volume and proportionality: the main risk to uptake

Six groups from four partners (HU-1, HU-2, FM-1, FM-2, JC-1, UN-1) said the framework is, or looks, too heavy. HU-1 judged volume the main risk to uptake: organisations with one or two staff would skip an overwhelming document, and busy professionals decide within seconds whether material is relevant. FM-1 and FM-2 both observed that the framework looks more complex than it is on a first reading, and both proposed service design to make it approachable. UN-1 named the breadth of 31 competencies as a

barrier, with limited staff time and unclear institutional ownership. HU-2 added a decision-maker view: municipal officials want a Finnish summary of one A4 page or fewer than ten slides. The heritage researcher in HU-2 also warned that 31 competencies plus levels can themselves feed a checkbox attitude.

Differing views. FM-1 asked whether the number of competencies could be reduced (for example by combining ENV-03 with ENV-06 and SOC-01 with SOC-03), and one JC-1 participant suggested consolidating the 31. Against this, another JC-1 participant held that the detailed framework is already usable if institutions select what they need, JC-2 preferred clarifying boundaries to reducing numbers, and HU-1 found nothing superfluous. FM-2 added that larger organisations are likelier to have the capacity to approach the framework at all. No group proposed deleting content, so the weight of evidence favours adding an entry layer over cutting competencies.

What participants asked for.

- A "starter toolbox" that covers all four domains, with an advanced tier, explicit modular use, and a marking of which competencies every staff member needs and which are role-specific (HU-1).
- Sector-specific priorities: environmental and conservation data for museums, accessibility, community and communication for libraries, sustainable exhibitions and supply-chain circularity for galleries (MZ-1).
- A shorter, plain-language practical version, and examples that show what a one-person institution can realistically do (JC-1).
- A short introduction that states the benefits to GLAM organisations (FM-2).

The core version already holds a proportionality principle (section 5.1 of the framework) and a table of priority competencies by setting (section 5.2 of the framework). Yet MZ-1 called the proportionality statement generic and HU-1 asked for explicit modular use. The content may need to be made more prominent, more specific and linked to roles, rather than written from scratch.

Implication. Add a one- to two-page entry version and a visible starter pathway, and develop the priority table in section 5.2 of the framework into sub-sector and size pathways tied to competency profiles.

4.3.4. Clarity, terminology and language

Clarity depends on who is reading. Participants with ESG, policy or academic backgrounds found the framework clear (MZ-1, MZ-2); practitioners in small or non-specialist settings found parts of it hard (HU-1, FM-1, FM-2, JC-2, UN-1, UN-2). The difficulty sits in particular places, not in the document as a whole.

Domains differ. HU-1 found the environmental and social domains clear and the governance and cross-cutting domains harder, mainly because of terminology and unfamiliar concepts, especially in artist-led associations where governance is sometimes resisted or contested. FM-2 found the cross-cutting competencies the hardest to approach in practice. FM-1's own difficulty concerned the language style and terminology of the framework rather than a particular domain. In contrast to FM-2, FM-1 argued that the cross-cutting section should carry the biggest priority and could absorb even more themes. HU-1's gallery representative strongly supported keeping governance and asked for examples showing how it appears in an individual's own work.

Terms need plain-language support. All three UN-2 participants asked for short explanations of CSRD, ESRS and the EU Taxonomy, two asked for materiality, and UN-1 added Global Reporting Initiative (GRI). JC-2 asked for "circular economy" and "micro-credentials" to be defined, queried what "basic" means in CC-05, and suggested renaming CC-04 "Meaningful ESG implementation" (one participant). HU-1 asked what "basic ESG literacy" (CC-01) means, advised avoiding acronyms, and the HU-1 moderator noted that the term "cultural stewardship" in GOV-01 needs a clearer definition. The glossary in the core version defines six terms (GLAM, Bizot Green Protocol, Faro Convention, checkbox approach, cross-cutting ESG, ESG Knowledge Box) and none of those flagged. Participants also cite an Appendix A glossary, so the fuller version may already hold some.

Titles, descriptions and training content must agree. JC-1 found inconsistencies: public programmes are less visible than exhibitions in the ENV-03 training content, the ENV-01 description stresses regulation over awareness, and the scope of "records" in GOV-07 is unclear. MZ-1 noted that titles mix logics ("literacy", "management", "preparedness") and proposed a consistent action-plus-object pattern. FM-1 found

terminology “wobbly” and noted a possible error in the spelling of the Finnish museum union’s name on page 8 of the framework, which should be checked.

Language is a barrier in Finland and Serbia. Both Humak groups (HU-1, HU-2) said an English-only framework slows uptake even among fluent readers, and that Finnish terminology for concepts such as governance is not yet established and must be developed with human experts. Humak points out that this is a linguistic and semantic question that is more complex than the absence of a single term, and that it should be checked with Finnish-language experts. UN-1 and UN-2 asked for a Serbian-language version. MZ-2 suggested later translation into other major languages. The Latvian groups, FM-1, FM-2 and MZ-1 did not raise language. The course will be delivered in five languages, but the framework text is in English.

Examples are the most requested fix. Real-life examples, templates and worked cases were requested in seven groups (HU-1, HU-2, JC-1, JC-2, MZ-2, UN-1, UN-2) from four partners; FM-1 also asked for practical directions for collections work. The requests are specific: library and one-person-institution cases (HU-2, JC-1), examples of failed approaches (JC-2), an end-to-end worked example such as a fictional museum (MZ-2), festival and event examples and a press-release versus annual-report illustration of communicating versus reporting ESG (UN-2). Participants in UN-1 and UN-2 credited the existing GLAM-specific examples with making the competencies accessible.

Implication. Treat clarity as a layer to add, not a rewrite: expand the glossary, adopt a consistent naming pattern, align titles with descriptions and training content, and produce Finnish and Serbian versions with human-developed terminology.

4.3.5. Overlaps: clarify boundaries first, merging is for the consortium to decide

Nobody asked to delete a competency, but seven groups saw overlaps (HU-1, HU-2, FM-1, JC-1, JC-2, UN-1, and one participant in MZ-1). Only the data cluster was flagged independently by groups at several partners. Other proposals were scattered across different pairings, so there is no consensus on which competencies to merge.

Table 10. Overlaps flagged and treatments proposed

Overlap flagged	Groups	Treatment proposed	Note
ESG data cluster: CC-05, ENV-08, GOV-06, GOV-07	HU-1, HU-2, JC-1, JC-2, MZ-1, UN-1	State boundaries and cross-reference (JC-2, MZ-1, UN-1: all three UN-1 participants); merge GOV-06 with GOV-07 (HU-2; HU-1 participants noted the overlap)	Four partners. One JC-2 participant thought clearer definitions might suffice. Merge evidence comes from Humak only. JC-2 also asked whether GOV-07 covers data analysis.
Access, participation, inclusion: SOC-01, -02, -03, -05, -06	FM-1, HU-1, HU-2, JC-1	SOC-01 with SOC-03 (FM-1); SOC-01 with SOC-02 (HU-1, moderator's suggestion); SOC-03 with SOC-06 (HU-2); review SOC-01/-02/-03/-05 (JC-1)	Four different pairings; no pair is supported by two groups.
Governance: GOV-02, GOV-03, GOV-05, GOV-06	HU-1, JC-2, MZ-1	GOV-02 with GOV-05 (HU-1); clarify GOV-02 versus GOV-03 (JC-2); cross-reference GOV-03 and GOV-06 (HU-1)	MZ-1 asked the opposite for GOV-02: give transparency and accountability a more central position.
ENV-03 and ENV-06	FM-1	Combine	Single group.
ENV-05 and GOV-08	JC-1	Clarify boundary or consolidate	Single group.
ENV-07 and GOV-03	HU-1	Clarify boundary; name armed conflict-related safeguarding of collections	Single group; see Section 4.3.6.
CC-06 with GOV-06 and GOV-07	HU-1 (moderator), JC-1	Question whether CC-06 should be separate	In JC-1 the museum representative supported its cross-cutting position.
SOC-09 (placement and wording)	HU-2, JC-2	Move to Governance (HU-2); reconsider wording, scope and placement (JC-2)	Content is supported in JC-1, JC-2, UN-1 and UN-2; only placement and wording are disputed.

Four of the HU-1 change requests (22, 24, 25 and 26) are marked in the report as the moderator's own suggestions. They are shown above as moderator input and carry less weight than participant evidence.

Implication. Add explicit boundary statements and cross-references first; this is cheap and answers the concern raised by three UN-1 participants that small institutions will read overlapping competencies as separate obligations. Treat the number of groups asking for a merge as a signal for the partners to check and discuss, not as a vote that decides it. On present evidence the clearest signal is GOV-06 with GOV-07, and even there the support comes from one partner plus a general remark in JC-1. Any merge, including the other pairings, should be decided within the consortium.

4.3.6. Content gaps and emerging needs

No group found a domain missing. Yet several content extensions emerged, three of them backed by more than one group.

Broader crisis preparedness (four groups, two partners). JC-1 named this the clearest gap: ENV-07 covers environmentally induced emergencies, but participants wanted civil protection, military or war-related threats, information resilience and the fight against disinformation made explicit. JC-2 agreed and suggested placing civil protection and war-related preparedness within GOV-03, aligned with national and municipal civil protection systems, rather than creating a new competency. HU-2 asked for climate-related natural hazards and protocols for saving collections in ENV-07 and GOV-03. HU-1 asked for the safeguarding of heritage in disasters and conflicts to be named and for the boundary between GOV-03 and ENV-07 to be clarified. The emphasis differs by group: war and civil protection in the Latvian groups, the safeguarding of heritage in disasters and conflicts in HU-1, and climate-related natural hazards in HU-2. Humak notes that Finnish participants' views on preparedness were closer to the Latvian ones, because Finland faces fewer evident natural hazards (such as earthquakes, landslides or floods) than Italy or other countries. One HU-1 expert judged ENV-07 less pressing in Finland than elsewhere, while FM-2 called it very concrete and relevant, noting that European countries are moving at different paces on different threats. ENV-07 was also a training priority in JC-1, JC-2 and UN-1.

Digital and AI (four groups, four partners). CC-06 is the most prioritised competency and also the most debated (see Section 4.3.8). FM-2 found it narrow and outdated: it omits long-term preservation of born-digital materials, and AI might merit its own code. HU-1 added AI copyright for artists and the sustainability of online collections. A

UN-1 participant asked for examples on the digital wellbeing of users under CC-06 or SOC-01. In JC-1, by contrast, some library participants questioned whether it should stand as a separate cross-cutting competency, while a museum representative defended it.

Heritage-specific environmental trade-offs (two groups, two partners). MZ-2 noted that environmental-efficiency competencies ignore the tension between retrofit and conservation in protected, fragile buildings. A participant added that historic structures can already be efficient and that Italian regulatory criteria are roughly thirty years old. HU-1 independently reported the Finnish debate on relaxing strict humidity and temperature standards for energy and cost savings. Both point to heritage-aware, evidence-based flexibility in ENV-02.

Single-group extensions.

- *Funded projects (MZ-2, one participant, rated high).* No competency covers designing and reporting externally funded projects, although the framework itself notes that ESG work depends heavily on project-based EU funding. A related request was for a governance link to economic indicators useful in dialogue with public funders.
- *Systemic depth and social ethics (HU-2).* Cross-cutting and social competencies could address the polycrisis and systemic change, the handling of polarisation and extremism (SOC-03, GOV-01), and the emotional sustainability of staff (SOC-09). HU-1 separately said DEI (diversity, equity and inclusion) is understood narrowly in Finland, whereas an HU-2 participant said public GLAM institutions are already very good at DEI.
- *Communication and greenwashing (UN-2).* Link GOV-05 explicitly to CC-04 so that preventing greenwashing in public communication is visible.
- *Festivals, events and independent organisations (UN-2).* Add examples for ENV-03, SOC-02 and SOC-07 and consider organisations that cooperate with GLAM institutions.

- *Smaller points.* ESG education from school to university as a civic skill (MZ-1, low priority); media and information literacy (one JC-2 participant, explicitly not a group conclusion); central versus local public administration (MZ-1).

Implication. Treat crisis preparedness as an all-hazards extension of ENV-07 and GOV-03 with country-adaptable examples, decide the scope and placement of CC-06, and add heritage-aware guidance to ENV-02. Single-group extensions should be logged and tested in the pilot before they become new competencies.

4.3.7. Applicability: uptake depends on conditions outside the text

Every group saw practical uses, but eight (HU-1, HU-2, FM-2, JC-1, JC-2, MZ-1, MZ-2, UN-1) tied adoption to something beyond the framework document: funders, planning cycles, existing standards or institutional endorsement.

Uses named. Designing training (HU-1, UN-1, UN-2); self-assessment and gap analysis (UN-1, UN-2, MZ-1); curriculum and micro-credential design (UN-1); job descriptions, induction and annual planning (UN-1, UN-2, JC-1); improving risk plans, strategies and reports (JC-2); making existing but invisible work in GLAM organisations visible to superiors, municipal decision-makers and funders (HU-2); and onboarding volunteers (UN-2).

Barriers named.

- *Capacity*: limited staff, time and funding (HU-1, JC-1, JC-2, UN-1, UN-2). FM-1 asked how organisations can release staff for a course of around 30 working hours.
- *Governance and procurement*: a city museum's governance is set by the city (FM-2); centralised, lowest-price procurement limits sustainable choices (JC-1, HU-2); local public bodies lack the budget autonomy of central ones (MZ-1).
- *Parallel frameworks*: museums already follow standards and schemes such as Spectrum and EcoCompass (FM-1), city ESG pathways (FM-2) and newer frameworks such as "Sofia" (MZ-2), so adoption may stay nominal to avoid duplicate work.
- *Learning is not implementing.* JC-1 stressed that training alone does not change practice. HU-2's heritage researcher warned that 31 competencies with levels

can feed a checkbox attitude, while its library professional valued checklists for showing that work has been done.

Conditions for uptake. Participants converged on a small set:

- (Toolkit/Course) Tools that lower the first step: a simple workbook or template (HU-1), a self-assessment tool that builds an individual path or an AI tutor (HU-1, HU-2), an implementation template linking priorities to owner, budget, timeline and indicators (UN-2), and short evidence rubrics (UN-1).
- (Toolkit/Course: mapping tools, PIAO insertion) Integration with what institutions already do: no "eighty-seventh" extra report (JC-2), the Piano Integrato di Attività e Organizzazione (PIAO) planning instrument in Italian public bodies, whose triennial cycle must be anticipated (MZ-1), and mapping tools to other frameworks, following GRI's conversion to the Sustainable Development Goals (SDGs) (MZ-2).
- External drivers: funder and policy expectations (HU-1, HU-2, UN-2), and endorsement by leaders, professional associations and ministries (UN-1, UN-2, JC-1).
- (Toolkit/Course) Continued support after training, such as mentoring or a sector-level network (JC-1, JC-2).

Differing views. The relevant anchor depends on the country: funders without standardised tools in Finland (HU-1), the PIAO and the 40-hour training quota in Italy (MZ-1, MZ-2), founders, municipalities and civil-protection systems in Latvia (JC-1, JC-2), and ministries, associations and funders in Serbia (UN-1, UN-2).

Implication. The framework needs a short positioning section: how it relates to the International Council of Museums (ICOM), the International Federation of Library Associations and Institutions (IFLA) and the International Council on Archives (ICA) codes, the SDGs and existing schemes, what it offers each audience, and how it plugs into planning and reporting. Several requests (mapping tools, PIAO insertion, course length) belong to the course and toolkit rather than the framework text (labelled Toolkit/Course and kept out of the framework-change count), as MZ-1 and MZ-2 themselves noted.

4.3.8. Training priorities and course design

Only six groups named priorities at competency level (HU-1, HU-2, JC-1, JC-2, UN-1, UN-2). FM-1 gave a domain-level view (cross-cutting first), FM-2 and MZ-2 gave none, and MZ-1 spoke only of sector emphasis. The priorities therefore come from participants, who are experts moderated by three of the five partners (Humak, Jelgava City Library and the University of Novi Sad), not from the partners themselves. Participants in the Forum Marinum and Mazzini Lab groups did not name competency-level priorities, so Figure 14 cannot be read as representative of Finnish museums or of Italy. Figure 14 therefore counts how many of these six groups had at least one participant name each competency; it is a count of mentions, not a ranking, and participants did not rank.

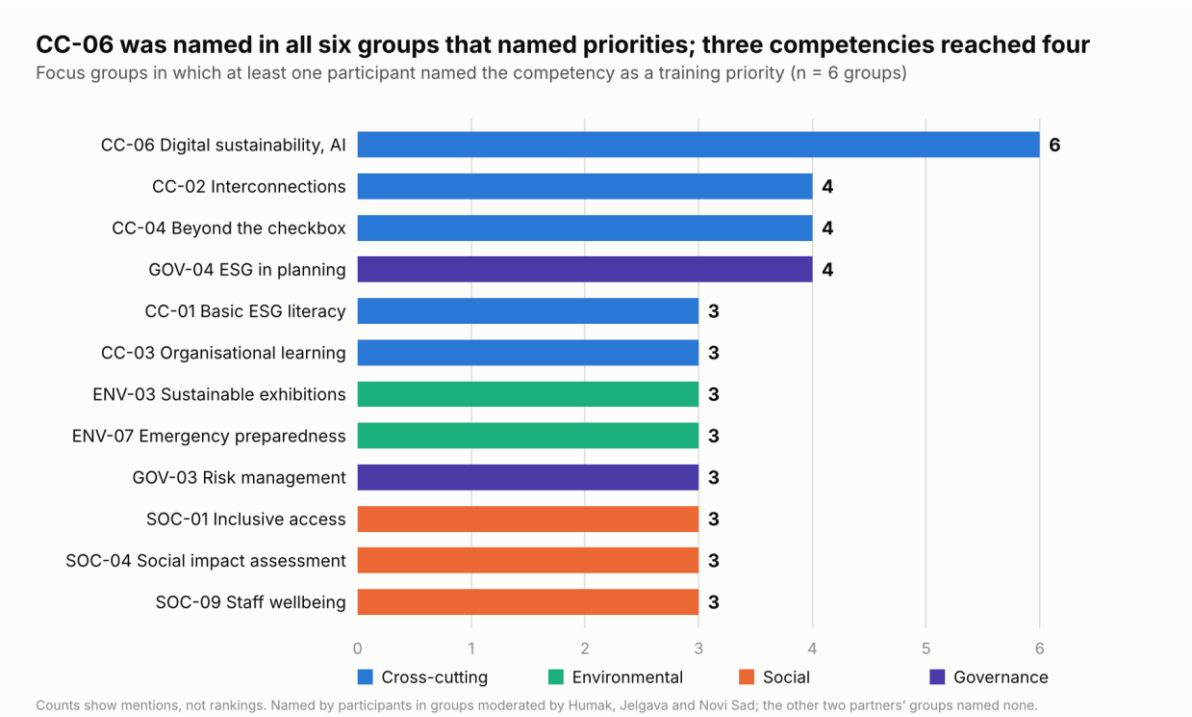

Figure 14. Competencies named as training priorities, by number of focus groups (six groups, three partners: CC-06 named in six, CC-02, CC-04 and GOV-04 in four, the other eight in three)

Two patterns stand out. First, CC-06 was named in all six groups, yet it is also the competency whose scope and placement were most debated, whether it was questioned or considered for merging or relocation (Sections 4.3.5 and 4.3.6). Second, the cross-cutting foundation came first for many: CC-01 and CC-04 were the common starting point for UN-1, UN-2 and JC-2, and CC-02 and GOV-04 joined CC-04 in four

groups each. Priorities otherwise differed by role and sub-sector. JC-1 and JC-2 explicitly produced no common list. In HU-1, museum participants stressed collection safeguarding and climate-control standards, while small artist associations stressed basic governance, internal control and crisis readiness. MZ-1 argued that pathways should differ for museums, libraries and galleries. Silence is not evidence of low value: ENV-04 and SOC-08 were not discussed in any report.

Course design signals (Toolkit/Course). These concern the course and tools rather than the framework text and are kept out of the framework-change count, but they shape how the framework will be used.

- *Format.* Short modular e-learning with practical workshops that produce a real institutional output, such as an ESG action plan or risk register (UN-1, UN-2); blended learning with workshops, peer learning and simulations (JC-1, JC-2); live Q&A and peer discussion so that self-paced learning is not left unattended, modules of 15–20 minutes, and a recap at the end of each lesson (MZ-2).
- *Recognition.* EQF-referenced micro-credentials or open badges (UN-1, UN-2); a certificate showing content and hours, though the issuer would affect its value (JC-1, JC-2); a simple pass/fail multiple-choice exam (MZ-2). The HU-2 library professional doubted that certificates would be more than a new checkbox, whereas the heritage researcher proposed certificates by domain and level.
- *Duration.* MZ-2 recommended aligning the course to the 40 hours of annual training required in Italian public administration, while FM-1 asked how staff could be released for around 30 working hours and HU-1 said even a course of this length is hard to fit into a small organisation.
- *Flexibility.* MZ-2 warned that strictly sequential progression through levels can lead to disengagement, and recommended free choice of modules.
- *Pilot and support.* UN-1, UN-2 and MZ-2 asked for a pilot in institutions of different sizes before finalisation, and JC-1 and JC-2 asked for mentoring or a sector support network after training.

Implication. Prioritise the cross-cutting foundation and the most frequently named operational competencies in the first course modules, but offer sector- and role-specific pathways rather than one fixed order.

4.3.9. Common findings and partner-specific insights

Table 11 separates what recurred across partners from what is tied to one country or institution. Context-specific findings are not weaker; they mark where the framework needs adaptable examples or national annexes rather than a single change. Partners are named by their abbreviations: Humak, FM (Forum Marinum), JCL (Jelgava City Library), ML (Mazzini Lab) and UNS (University of Novi Sad).

Table 11. Common findings versus partner-specific insights

Level of sharing	Finding	Partners (groups)
Shared by four or five partners	Architecture judged relevant and comprehensive at overview level; no domain missing	All five (10 groups)
	Levels should follow function or proficiency, be assessed per competency, and be described in more depth	Humak, JCL, ML, UNS; FM in part
	Entry layer or pathways needed because of perceived volume and size differences	Humak, FM, JCL, UNS; ML in part
	Practical examples, templates and tools needed	Humak, JCL, ML, UNS; FM in part
	Adoption depends on funders, planning, existing standards or endorsement	All five
	ESG data competencies overlap and need boundaries	Humak, JCL, ML, UNS
Shared by two or three partners	National-language versions with human-developed terminology	Humak (2 groups), UNS (2 groups); ML for later
	Broader crisis and hazard preparedness	JCL (2 groups), Humak (2 groups)
	CC-06 scope or placement	FM, Humak, UNS, JCL
	Heritage-aware flexibility in ENV-02	Humak, ML
	Blended, practical training with meaningful recognition	JCL, UNS, ML
	Pilot before finalisation	UNS (2 groups), ML

Level of sharing	Finding	Partners (groups)
Specific to one partner or context	Flat organisations, volunteer-run museums, artist-led governance as a challenge, Finnish terminology, funders without standardised tools, city-museum governance limits, born-digital preservation, service design	Humak, FM (Finland)
	War and civil protection, information resilience, Latvian job titles and qualifications, technical staff at L1, no extra reporting	JCL (Latvia)
	PIAO planning instrument, 40-hour training quota, central versus local public administration, funded-project competency, mapping to other frameworks, interconnections between domains, naming convention	ML (Italy)
	Implementation template in GOV-04, greenwashing link between GOV-05 and CC-04, festivals and independent organisations, individual competence versus institutional maturity, versioning	UNS (Serbia)

4.4. Recommendations from the focus groups

Recommendations are in two tables. Table 12 holds those supported by at least three focus groups from at least two partners (R1–R12). Table 13 holds suggestions from fewer groups or individual participants (S1–S12); these should be logged and tested in the pilot rather than adopted automatically. Priority follows the rule set out below. Rows are grouped by theme (structure R1–R5, language R6–R7, content R8–R10, implementation R11–R12), not sorted by priority; the Priority column makes the order visible. Where a request concerns the course or toolkit rather than the framework text, the table says so with the label Toolkit/Course.

Priority rule. One rule is applied to every row of Tables 12 and 13, and the Priority column shows its inputs. Breadth counts the groups and partners listed in the Supporting focus groups column, leaving out entries qualified as related, partial, one participant, later or relevance noted. Breadth is Broad (seven or more groups from at least four partners), Moderate (four to six groups from at least three partners) or Limited (anything else).

Impact is Structural when the change alters the level model, the architecture, the scope or placement of a competency, or adds a layer to the framework, and Refinement when it concerns wording, examples, boundary statements, tools or process. Priority is High for Broad breadth, or for Moderate breadth with Structural impact; every other row in Table 12 is Medium. In Table 13, every row below the Table 12 threshold (three groups from two partners for the same request) is Low, and an explicit High rating recorded in this report raises a row by one step (this applies to S2 only). Ratings that partners gave in their own change request tables are used only where this report states them. The rule orders the work; it does not measure importance to participants, and it does not exclude any suggestion from discussion. Suggestions from a single participant stay in Table 13 and in the change-request register (Section 4.7, Next step 2) and should all be considered, because one expert may notice what others did not.

Count of framework changes. Ten of the twelve recommendations in Table 12 (R1–R4, R6–R10 and R12) concern the framework itself: its text, structure or versioning. R5 and R11 are labelled Toolkit/Course and are kept out of that count, although the positioning section proposed in R11 is a framework-text item for the authors to decide. R1 and R2 are provisional pending the version check (Section 4.1 and Section 4.7, Next step 1).

Table 12. Recommendations supported by several focus groups

framework element / competence	Priority	Feedback received	Suggested improvement	Supporting focus groups
R1. Levels L1–L5: link to job title and seniority (provisional pending version check)	**High** Broad: 7 groups, 4 partners Structural	Levels read as tied to job titles and rank, but ESG competence does not track seniority. In small institutions one person spans several levels. Italian public-sector grades are function-based. EQF describes learning outcomes, not rank.	Define levels by responsibility, autonomy and demonstrated evidence. State that job titles and EQF ranges are illustrative. Make self-assessment return a profile with a level per competency. Consider a CEFR-style scale or matrix. Allow non-sequential access.	HU-1, HU-2, JC-1, JC-2, MZ-1, UN-1, UN-2; related: FM-1, FM-2

framework element / competence	Priority	Feedback received	Suggested improvement	Supporting focus groups
R2. Level descriptors (provisional pending version check)	**High** Moderate: 5 groups, 3 partners Structural	Descriptions reported as one line each. L4 and L5 are indistinct, L5 reads as organisational, verbs are broad, and every competency carries the same range. L1 is valued for support staff and volunteers.	Write distinct descriptors per competency, each with one observable output or decision. Separate individual competence from institutional maturity. Keep L1 for support staff and volunteers. Strengthen the ENV-07 L1 descriptor. Check against the fuller version first.	JC-1, MZ-1, MZ-2, UN-1, UN-2; JC-2 (one participant); related: FM-1, FM-2
R3. Whole framework: entry layer	**High** Moderate: 6 groups, 4 partners Structural	The framework looks heavy; first impressions decide uptake; municipal decision-makers want one page; small and volunteer-run bodies may skip it.	Add a one- to two-page entry summary and a modular-use statement. Offer a starter pathway across all four domains plus an advanced tier. Mark baseline versus role-specific competencies. Apply service design. Remove the repeated EQF row.	HU-1, HU-2, FM-1, FM-2, JC-1, UN-1; related: MZ-1
R4. Proportionality and pathways (framework section 5)	**High** Moderate: 6 groups, 5 partners Structural	Proportionality statement seen as generic. Needs differ by sub-sector, size, governance and volunteer status.	Develop the table in section 5.2 of the framework into sub-sector and size pathways linked to competency profiles. Distinguish central from local public bodies. Address volunteer-run museums and associations explicitly.	HU-1, JC-1, JC-2, FM-2, MZ-1, UN-1
R5. (Toolkit/Course) Examples, templates and tools	**High** Broad: 7 groups, 4 partners Refinement	Examples are the most requested fix, especially for one-person institutions, libraries, failed approaches and events. Templates	Add examples in every domain, including small and one-person institutions and unsuccessful approaches. Add an end-to-end worked example. Provide	HU-1, HU-2, JC-1, JC-2, MZ-2, UN-1, UN-2; related: FM-1

framework element / competence	Priority	Feedback received	Suggested improvement	Supporting focus groups
		and self-assessment wanted.	workbook, templates, prioritisation tool and self-assessment (toolkit).	
R6. Terminology, glossary and naming	**High** Broad: 7 groups, 5 partners Refinement	CSRD, ESRS, EU Taxonomy, materiality, GRI, circular economy, micro-credentials and "basic" (CC-01, CC-05) unclear. Titles mix logics. Inconsistencies between titles, descriptions and training content.	Expand the glossary and link alignment rows to it. Give each term a one-line definition with a GLAM example. Adopt one naming pattern. Align ENV-01, ENV-03 and GOV-07 titles, descriptions and training content. Avoid acronyms. Check the spelling of the Finnish museum union's name in the framework and correct it if needed.	HU-1, FM-1, JC-1, JC-2, MZ-1, UN-1, UN-2
R7. National-language versions	**Medium** Limited: 3 groups, 2 partners Refinement	English-only text is a barrier even for fluent readers. Finnish terminology for "governance" is not established and needs checking with Finnish-language experts.	Produce Finnish (and Swedish where relevant) and Serbian versions. Develop terminology with human experts, using machine translation only as support.	HU-1, HU-2, UN-1; UN-2 (one participant); MZ-2 (later)
R8. ESG data cluster: CC-05, ENV-08, GOV-06, GOV-07	**Medium** Moderate: 6 groups, 4 partners Refinement	Boundaries unclear; risk of the same skill being rated twice or read as three duties. Unclear whether GOV-07 covers analysis and what "records" means.	Add boundary statements and cross-references. Define "basic" in CC-05 and the scope of GOV-07. Test merging GOV-06 with GOV-07.	HU-1, HU-2, JC-1, JC-2, MZ-1, UN-1
R9. Preparedness: ENV-07 and GOV-03	**Medium** Limited: 3 groups, 2	Focus on environmental emergencies leaves out civil	Reframe as all-hazards preparedness with country-adaptable examples. Clarify the ENV-	JC-1, JC-2, HU-2; HU-1 (partial); relevance noted: FM-2, UN-1

framework element / competence	Priority	Feedback received	Suggested improvement	Supporting focus groups
	partners Structural	protection, armed conflict-related threats, information resilience, natural hazards and disaster protocols.	07 and GOV-03 boundary. Name safeguarding of collections in disasters and conflicts. Align with national civil protection systems.	
R10. CC-06 Digital sustainability and responsible AI	**High** Moderate: 4 groups, 4 partners Structural	Most prioritised competency, but scope called narrow and placement questioned. Born-digital preservation, AI copyright and online collections missing.	Decide whether to keep CC-06 as one cross-cutting competency with wider scope or to split digital preservation from responsible AI. Add the missing examples and digital wellbeing.	FM-2, HU-1, JC-1, UN-1
R11. (Toolkit/Course: mapping tools; the positioning section is a framework-text item) Positioning and integration with existing systems	**High** Broad: 8 groups, 5 partners Refinement	Added value over existing standards unclear. Risk of duplicate work. Funders offer no tools. Reporting must not grow.	Add a positioning section (ICOM, IFLA, ICA codes, SDGs, Spectrum, EcoCompass). Show how the framework plugs into planning and reporting. Plan mapping tools to other frameworks (toolkit).	HU-1, HU-2, FM-2, JC-1, JC-2, MZ-1, MZ-2, UN-1; related: FM-1, UN-2
R12. Process: pilot and versioning	**Medium** Limited: 3 groups, 2 partners Refinement (process)	Participants asked to test usability and proportionality in institutions of different sizes before finalisation, and to update CC-06 and regulatory references.	Pilot the revised framework and tools in institutions of different sizes and GLAM types. Introduce transparent versioning and review.	UN-1, UN-2, MZ-2; versioning: UN-1

Table 13. Suggestions from fewer groups or individual participants

framework element / competence	Priority	Feedback received	Suggested improvement	Supporting focus groups
S1. GOV-04, CC-03: implementation	**Low** 2 groups, 1 partner	Add the route from priorities to projects, owners, budgets, timelines and measurable outcomes.	Reword both competencies; offer an implementation template (toolkit).	UN-1, UN-2 (one participant each); related: JC-1, JC-2
S2. New or extended competency: funded projects	**Medium** 1 group, 1 partner; explicit High rating (one participant) raises Low by one step	No competency covers designing and reporting funded projects; no governance link to economic indicators for public funders.	Extend a governance or cross-cutting competency; test in the pilot.	MZ-2 (one participant, rated high)
S3. ENV-02: heritage-aware flexibility	**Low** 2 groups, 2 partners	Retrofit versus conservation in protected buildings; relaxing strict humidity and temperature standards.	Add heritage-specific considerations and examples.	MZ-2, HU-1
S4. CC-04 and GOV-05: communication and greenwashing	**Low** 2 groups, 2 partners	Link greenwashing prevention to stakeholder communication; show where communicating ESG ends and reporting begins.	Cross-reference both; add press-release, website and annual-report examples.	UN-2 (one participant); CC-04 rename: JC-2 (one participant)
S5. Cross-cutting and social depth: SOC-03, GOV-01, SOC-09	**Low** 2 groups, 1 partner	Polycrisis and systemic change; polarisation and extremism; emotional sustainability of staff. Another HU-2 participant said public GLAM	Test additional wording and examples; do not add a competency yet.	HU-2; DEI breadth: HU-1

framework element / competence	Priority	Feedback received	Suggested improvement	Supporting focus groups
		bodies already do DEI well.		
S6. SOC-09: placement and wording	**Low** 2 groups, 2 partners	Move to Governance; reconsider the word "wellbeing". Content itself supported elsewhere.	Decide placement; keep the content; reflect wellbeing across other competencies.	HU-2, JC-2; content supported: JC-1, UN-1, UN-2
S7. SOC-01, -02, -03, -05, -06: pairings	**Low** 4 groups, 3 partners, but each pairing has 1 group	Four groups proposed four different pairings.	Defer merging; add boundary notes.	FM-1, HU-1 (moderator), HU-2, JC-1
S8. GOV-02: merge or elevate	**Low** 2 groups, 2 partners	Merge with GOV-05 (HU-1); alternatively place transparency and accountability centrally (MZ-1).	Author decision after the pilot.	HU-1, MZ-1; related: JC-2
S9. ENV-03 with ENV-06; ENV-05 with GOV-08	**Low** 2 groups, 2 partners	Possible combinations; ENV-03 public programmes less visible in training content.	Clarify boundaries; add public-programme content to ENV-03.	FM-1, JC-1
S10. ENV-03, SOC-02, SOC-07: events and festivals	**Low** 1 group, 1 partner	GLAM bodies increasingly work with festivals and independent organisations.	Add examples; consider scope for cooperating organisations.	UN-2 (one participant)
S11. Public-sector fit	**Low** 1 group, 1 partner	Central and local public bodies are not equivalent; Italian grades are function-based.	Add a central/local distinction; avoid private-sector role clusters.	MZ-1
S12. Domain interconnections ; ESG education	**Low** 2 groups, 1 partner	Domains look like separate blocks; ESG education	Show interconnections visually; consider a note on ESG education.	MZ-2; MZ-1 (one participant)

framework element / competence	Priority	Feedback received	Suggested improvement	Supporting focus groups
		could extend to schools as a civic skill (low priority).		

4.5. Overall assessment by the focus groups

The evidence supports the framework's relevance and breadth at overview level, supports its clarity with refinement, and does not yet support its level structure or its readiness for small institutions. Table 14 sets out the assessment by dimension. It describes what the ten group members said; it is not a formal approval or a claim of consensus.

Table 14. Assessment by validation dimension

Dimension	Evidence	Assessment
Relevance to the GLAM sector	All ten groups, all five partners, judged the framework's architecture (four domains, 31 competencies) relevant at overview level; practitioner-based support comes from at most six groups (HU-1, HU-2, FM-1, FM-2, JC-1, JC-2); none asked for a competency to be removed as irrelevant.	**Supported at overview level**
Completeness of scope	All ten judged the architecture comprehensive at overview level; no domain missing. ENV-04 and SOC-08 were not discussed and several others only in passing. Targeted gaps: broader preparedness (4 groups), digital scope (4), funded projects (1), heritage-aware environmental criteria (2).	**Supported, with targeted extensions**
Clarity	Clear to participants with policy or ESG backgrounds (MZ-1, MZ-2). Governance, cross-cutting competencies and regulatory terms hard for practitioners in small organisations (HU-1, FM-2, UN-1, UN-2, JC-2); FM-1 found the language style and terminology hard to approach. Language barrier in Finland and Serbia.	**Supported, with refinement**

Dimension	Evidence	Assessment
Level structure L1–L5	Every group raised a point; seven called for decoupling from job title and per-competency assessment; five for richer descriptors. Six accepted progression in principle.	**Not supported in current form** (R1, R2 provisional pending version check)
EQF mapping and presentation	The validity of the mapping was not assessed by any group (HU-1 states this explicitly). Its presentation was commented on: UN-1 asked that EQF be presented as learning outcomes, not rank, and FM-1 suggested dropping the repeated EQF row.	**Mapping not assessed; presentation commented on**
Internal coherence	Seven groups saw overlaps; the data cluster appeared at four partners. No agreed merge except a possible GOV-06 and GOV-07.	**Needs refinement**
Proportionality principle	Endorsed in spirit; called generic by MZ-1; six groups warned of volume. The pathways in section 5.2 of the framework exist but did not register as sufficient.	**Needs development**
Practical applicability	Clear uses named in every group. Uptake tied to examples, tools, funders, planning and endorsement (8 groups).	**Conditional**

4.5.1. Competency-level view

Figure 15 shows, for fifteen rows (the level structure, single competencies and clusters of competencies), how many groups were positive, named them a training priority, asked for clarification, proposed merging or restructuring, or asked for extension. Reading across, three patterns emerge.

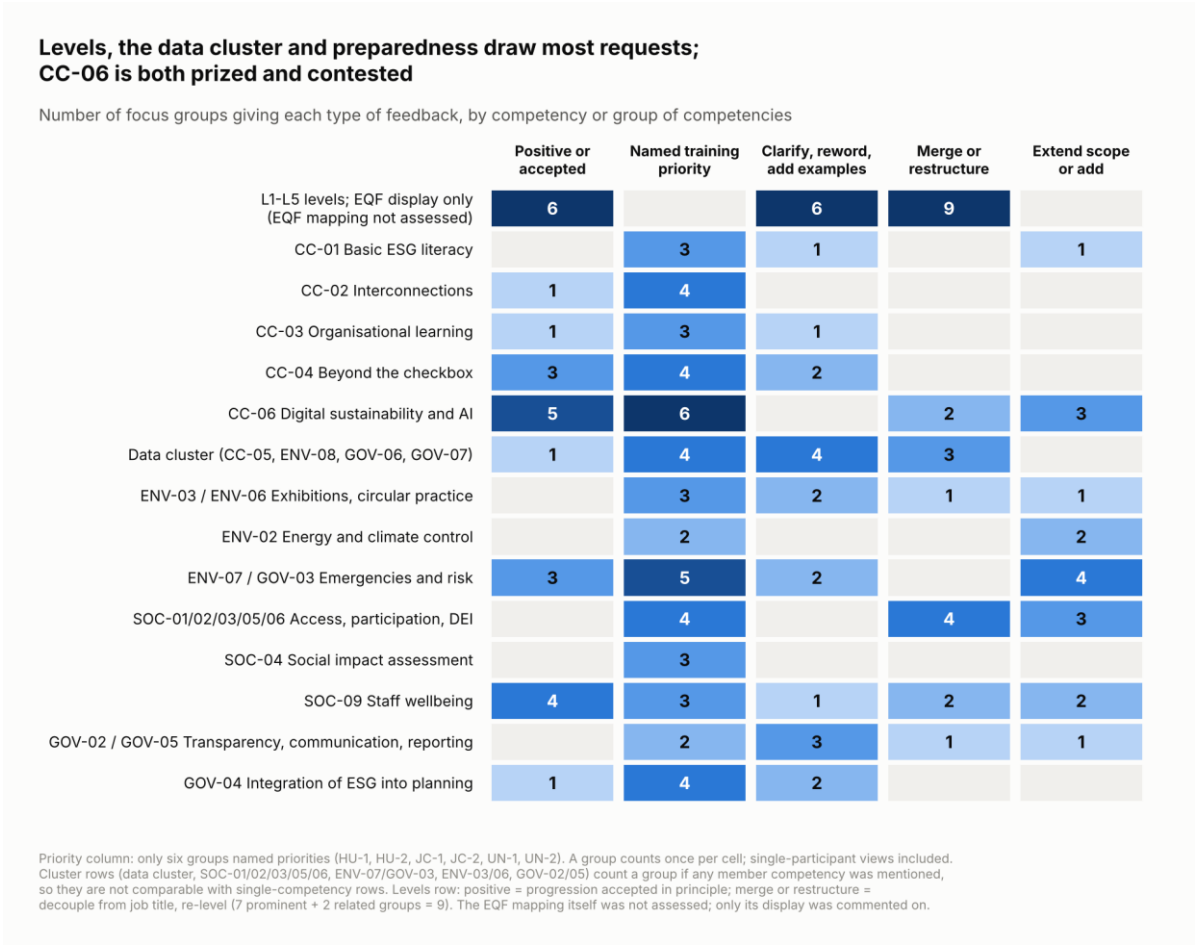

Figure 15. Competency feedback heatmap: number of focus groups per type of feedback

Note: several rows are clusters (the ESG data cluster; SOC-01/02/03/05/06; ENV-07 with GOV-03; ENV-03 with ENV-06; GOV-02 with GOV-05). A cluster row counts a group if any member competency was mentioned, so its values are not comparable with single-competency rows. In the levels row, the count of 9 under merge or restructure is 7 prominent plus 2 related groups (FM-1, FM-2). The EQF mapping itself was not assessed; only its display was commented on.

- **Named as priorities with few structural objections:** CC-02, CC-04, GOV-04 and SOC-04 attracted priority mentions with few or no structural objections (CC-02, CC-04 and GOV-04 were named by four of the six groups that named priorities, SOC-04 by three; only CC-04 also drew positive comments from several groups). SOC-09 drew positive comments from four groups, while its placement was disputed in two.

- **Popular but contested:** CC-06 is the single most prioritised competency and also drew requests to widen it and to reconsider its placement.
- **Needing refinement:** the levels, the ESG data cluster, the access and inclusion cluster, and ENV-07 with GOV-03 each drew requests for clarification, restructuring or extension.

Silence is not approval. ENV-04 and SOC-08 were not discussed in any report, and several competencies (for example ENV-06, SOC-05, SOC-07, GOV-01 and GOV-08) were mentioned only in passing. The evidence cannot say whether these are sound.

4.5.2. What the assessment does not show

The 34 participants are a small purposive sample, 13 of them from Finland. Two groups (MZ-1, MZ-2) did not consist of GLAM practitioners, in UN-2 two participants gave no role or institution, and archives were explicit in one group only. Participants reviewed the document rather than using it. The result is strong evidence on perceived relevance and on the shape of the problems, and weaker evidence on how often each problem occurs across the sector.

4.6. Convergence with the survey findings

The survey and the focus groups used the same five validation criteria, so they can be compared directly (Table 15). The two sources differ in method: the survey records a yes/no judgement from 102 respondents, whereas the focus groups record open discussion in ten groups and 34 participants. The survey therefore shows how widely a view is held, and the focus groups show what lies behind it. Jelgava City Library has confirmed that all ten of its focus group participants also completed the online validation survey, so the two sources overlap for that group; for the other partners the datasets cannot show whether anyone took part in both.

Table 15. Comparison of survey and focus group findings by validation criterion

Criterion	Online survey (n = 102)	Focus groups (10 groups)	Reading
Completeness and relevance	Q1: 88.2% agree that the 31 competencies and four domains cover what GLAM professionals need. No	All ten groups judged the framework's architecture comprehensive and relevant at overview level. None asked for a	**Converge.** Both sources support the framework's architecture. The focus

Criterion	Online survey (n = 102)	Focus groups (10 groups)	Reading
	respondent identified a missing ESG domain.	domain to be added or a competency to be removed as irrelevant. Practitioner-based support comes from at most six groups.	group evidence is at overview level only: ENV-04 and SOC-08 were not discussed.
Clarity	Q2: 82.4% find descriptions and examples clear for non-ESG specialists; lowest among museums (65.4%) and Finnish respondents (60.9%). Comments ask for plainer language and concrete examples.	Clarity is uneven. Environmental and social competencies were found clear; governance and cross-cutting competencies and regulatory terms (such as CSRD, ESRS, EU Taxonomy and materiality) need plain-language support. Examples were the most requested fix. English-only text is a barrier in Finland and Serbia.	**Converge.** Both sources ask for plain language, a glossary, realistic examples and translations into partner languages.
Levels (L1–L5, EQF 3–8)	Q3: 82.4% agree that the levels match real roles and careers; 17 comments, the second-highest number. Agreement is lower among museums (69.2%), archives (66.7%) and Finnish respondents (65.2%). Comments concern linearity, missing roles and organisational scale.	Every group raised at least one point on the levels. Seven asked to decouple levels from job titles and to assess them per competency; five asked for richer descriptors. The level structure was judged not supported in its current form.	**Same substance, different weight.** Both sources reject a linear, rank-based reading of the levels. The focus groups are more critical than the yes/no survey item, so the survey shows broad acceptance of the idea of levels and the focus groups show what should change.
Practical applicability	Q4: 74.5%, the lowest score (museums 57.7%, Finnish respondents 56.5%). The main barriers are time, budget and staff. Respondents ask for a lighter entry point, such as a checklist or self-assessment toolkit.	Uptake is conditional. Six groups warned that 31 competencies across five levels look heavy; seven asked for examples, templates and self-assessment tools; eight tied adoption to funders, planning cycles, existing standards or endorsement.	**Converge.** An entry layer, pathways and tools are asked for in both sources. The focus groups add the need to position the framework against existing standards and funders' expectations.
Basis for training and priorities	Q5: 94.1% agree that the framework is a useful basis for the 35-hour course. Q6: Cross-Cutting 51%, Social 42%, Environmental 25%,	Six groups named competency-level priorities: CC-06 in all six; CC-02, CC-04 and GOV-04 in four each. Participants also asked for modular, practical, blended	**Converge on Cross-Cutting first, with a difference in detail.** Governance was the domain named least in the survey, yet GOV-04

Criterion	Online survey (n = 102)	Focus groups (10 groups)	Reading
	Governance 24% of respondents.	training with recognition, and for a pilot.	(ESG in planning) was named in four of the six groups. The counts use different units (domains and competencies) and different samples.
Overlaps and consistency	Table 18, rows 1 and 2: overlaps and uneven scope of competencies (six Q1/Q2 comments); inconsistent count (29 against 31) and title–description mismatches.	Seven groups saw overlaps, mainly in the ESG data cluster (CC-05, ENV-08, GOV-06, GOV-07). Titles, descriptions and training content disagree for ENV-01, ENV-03 and GOV-07.	**Converge.** Both sources call for editorial consolidation, boundary statements and aligned titles and descriptions.
Differences between groups	Museums and Finnish respondents are the most critical; libraries and respondents from Serbia and Latvia are the most positive.	All four Finnish groups (HU-1, HU-2, FM-1, FM-2) were among the six that found the framework heavy or likely to look heavy.	**Consistent.** The survey and the focus groups both place the strongest usability concerns in Finland and in museums.

What the focus groups add

The focus groups give detail that a yes/no survey cannot. They add five points that the survey does not show:

- **A level model organised by competency, not by position.** Seven groups asked that levels reflect proficiency and function rather than job title or seniority, with levels defined by responsibility, autonomy and observable evidence (R1, R2).
- **The scope and placement of CC-06.** It is the most prioritised competency and also the most questioned: four groups from four partners questioned or widened its scope (R10).
- **Broader emergency preparedness.** Four groups, from Latvia and Finland, asked that ENV-07 and GOV-03 cover civil protection, armed conflict and other hazards (R9).
- **Anchoring in funders, planning cycles and existing standards.** Eight groups tied uptake to these conditions rather than to the text of the framework (R11).

- **A check against the full version. Some comments cite sections and level descriptors that are not in the core version. Participants received both versions (Section 4.1), so these comments must be checked against the full version before the level-related recommendations R1 and R2 are made final (Section 4.7, Next step 1).**

What the survey adds

The survey adds breadth and a measure of how views differ across the sector. Its 102 respondents from 12 countries and more than 70 organisations show high endorsement (91.2%, and 93.2% among stakeholders outside the consortium), a measure of how views differ by institution type and country, and a lower rate for practical applicability, especially among museums and in Finland. The focus groups cannot give these figures because their 34 participants are a small purposive sample.

Overall reading

The two sources agree that the framework is relevant, comprehensive at overview level and a useful basis for training, and that its main weakness lies in usability for small institutions. They differ in how they judge the level model: the survey gives it broad acceptance, whereas the focus groups judge it not supported in its current form and ask for a redesign. Because the survey item is binary and the focus groups discussed the levels in detail, the report treats the focus group points as the more specific guidance, and it keeps R1 and R2 provisional until the version check is complete.

4.7. Conclusions and next steps from the focus groups

Conclusions

- The four-domain, 31-competency architecture is a sound basis for the next version. All ten groups judged it relevant and comprehensive at overview level (practitioner-based support: at most six groups), and no group wanted a competency removed as irrelevant.
- The level structure is the priority for revision. It should become a proficiency-based, per-competency profile with richer descriptors, with job titles and EQF ranges illustrative only. R1 and R2 stay provisional until the version check is complete.

- Usability, not content, is the main risk. An entry layer, sector and size pathways, examples, templates and a self-assessment tool are what participants asked for most.
- Targeted content work is needed in three places: broader preparedness (ENV-07, GOV-03), the scope and placement of CC-06, and the ESG data cluster. Single-group extensions should be tested before becoming competencies.
- Uptake depends on positioning the framework within funders' expectations, planning cycles and existing standards, which differ by country.

Next steps

The sequence below links each step to the recommendations in Section 4.4. Owners follow the roles stated in the framework and the reports; the partners should confirm them. Step 1 comes first because the level-related recommendations (R1, R2) are provisional until it is complete; steps 3 and 4 depend on it.

Table 16. Next steps arising from the focus groups

Step	Action	Addresses	Suggested lead	Success indicator
1	Check the comments that cite sections and descriptors outside the core version against the full framework, and record the version used in UN-1 and UN-2. This step comes first: it must be completed before the level model and descriptors (step 3) are finalised, and R1 and R2 stay provisional until then.	R1, R2, R6	University of Novi Sad with all partners	The version used in UN-1 and UN-2 is recorded, every comment that refers to content outside the core version is checked against the full framework, and R1 and R2 are each confirmed or revised.
2	Log all 84 change requests in one register with a decision (adopted, deferred, declined) and a reason, so the share taken up can be reported.	All	University of Novi Sad	All 84 change requests are logged with a decision (adopted, deferred or declined) and a reason, and the share adopted is reported.

Step	Action	Addresses	Suggested lead	Success indicator
3	Redesign the level model and rewrite descriptors per competency. Depends on step 1.	R1, R2	University of Novi Sad, consolidating feedback from all sessions	A level model with per-competency profiles is agreed, and descriptors with one observable output exist for all 31 competencies at all five levels.
4	Draft the entry summary, starter pathway and sub-sector and size pathways; test the one-page decision-maker summary.	R3, R4, R11	University of Novi Sad with Humak, Forum Marinum and Jelgava City Library	A one- to two-page entry summary and a starter pathway across all four domains are drafted, sub-sector and size pathways are linked to competency profiles, and the one-page decision-maker summary is tested with its intended readers.
5	Editorial pass: glossary, naming pattern, boundary statements for the data cluster, alignment of titles with training content, factual corrections.	R6, R8	University of Novi Sad	The glossary covers every term flagged in Section 4.3.4, boundary statements exist for CC-05, ENV-08, GOV-06 and GOV-07, and titles, descriptions and training content agree for ENV-01, ENV-03 and GOV-07.
6	Decide the scope of ENV-07 and GOV-03, the scope and placement of CC-06, and heritage-aware guidance in ENV-02.	R9, R10, S3	University of Novi Sad with Jelgava, Humak, Forum Marinum and Mazzini Lab	Decisions on the scope of ENV-07 and GOV-03, on the scope and placement of CC-06 and on ENV-02 guidance are recorded, each with a reason.
7	Produce national-language versions with human-developed terminology.	R7	Partners in Finland and Serbia to confirm	Finnish and Serbian versions exist, with terminology developed with human experts.
8	(Toolkit/Course) Build examples, templates, a worked example, self-assessment and mapping tools; consider course points raised (40-hour alignment, blended format, non-sequential access, recognition).	R5, R11	Mazzini Lab and all partners	Examples in every domain (including small-institution and failure cases), an end-to-end worked example, a workbook, templates and a self-assessment tool exist, and each course point raised is recorded as adopted, deferred or declined.
9	Pilot the revised framework and tools in institutions of different	R12	All partners	The pilot has run in institutions of different sizes and GLAM types, and a versioning procedure is adopted.

Step	Action	Addresses	Suggested lead	Success indicator
	sizes and types; adopt versioning.			

A second round of validation should involve more archive and library practitioners and small or volunteer-run institutions, which this round reached only in part, and should test the revised levels directly with the people who would use them.

5. Achievement of validation indicators

Table 17 compares the validation results with the indicators set in the project application. The quantitative targets for stakeholder participation and approval are met by the survey alone; the ten focus groups add 34 participants and qualitative depth. The applicability target is met for the framework's use as a training basis but not for direct institutional implementation. The integration of feedback will be documented in a Version Comparison Matrix that accompanies the final framework release, and the dissemination target is met on the basis of the channels the partners have already used or plan to use (listed below the table).

Table 17. Achievement of WP2 validation indicators

Indicator	Target	Result	Status
Stakeholders providing feedback on the framework	≥ 100	102 survey respondents from more than 70 organisations in 12 countries + 34 focus group participants (ten focus groups in four countries)	Achieved
Diversity of cultural settings	Diverse settings	Libraries, museums, archives, higher education, cultural associations and public bodies, art market and fine-art services, consultancies; the focus groups add galleries, artist associations, cultural-policy and education bodies and festival organisations	Achieved
Validation approval rate	≥ 90%	91.2% endorse the framework as a valid reference tool (95% CI 84.1–95.3%); 93.2% among non-partner stakeholders	Achieved
Utility and applicability (positive feedback)	≥ 90%	Basis for training: 94.1%. Completeness and relevance: 88.2%. Practical applicability in own institution: 74.5%. Focus groups: practical applicability is conditional on an entry version, examples and tools	Partially achieved

Indicator	Target	Result	Status
Integration of key stakeholder suggestions	≥ 80%	18 recommended adjustments identified (Section 6). The Steering Committee decides on adopting or declining the requests at its meeting of 23 October 2026. The final framework release will be accompanied by a Version Comparison Matrix mapping the original draft against the revised version, to show that at least 80% of the key stakeholder recommendations have been incorporated	In progress
Dissemination of framework and validation findings	≥ 5 channels	Channels used or planned by four partners: partner websites and news, social media including LinkedIn, newsletters, press releases, professional networks and associations, and a national Multiplier Event (see the list below Table 17)	Achieved (used or planned)

Dissemination channels reported by the partners (October 2026)

5. **Humak.** Used: personalised emails (September 2026) with the framework to all participants of the first round of surveys and interviews, and the draft framework and reports shared with experts from Humak's own institutions who work with GLAM organisations. Planned, once the final report and framework are ready: Humak website news and social media posts, the Finnish ESG4GLAM Multiplier Event in Turku on 26 November 2026 (with Forum Marinum), and sharing with the partners of the Swiss BRIDGE-funded project "Culture Goes Sustainable" (University of Lausanne and Zurich University of Applied Sciences), which is linked to the "Culture for the Planet" alliance.
6. **Forum Marinum.** Used: personal networks, for example the military museum network, and LinkedIn. Planned: the project section of the Forum Marinum website and LinkedIn, the Multiplier Event in November, and the Tulevaisuusperintöverkosto network, the Varsinais-Suomen Varsinaiset kehittäjät community and Trafiikkiverkosto.
7. **Jelgava City Library.** Used: personal and professional networks. Planned: the library's website and social media, the Latvian Librarians' Association and the

Latvian Association for Librarians' Education, Jelgava Municipality's communication channels and relevant professional meetings and events. The focus group participants will be told about the validation results and the next steps.

8. **Mazzini Lab.** Used: its own social media channels and the project's official channels; an update and press release to newspapers, online portals and magazines; publication and listing on the European Heritage Hub; and a feature by DTC Lazio. Planned: a dedicated webpage for the validation results, a newsletter to all contributors presenting the main results and the review of change requests, and a new press release. Mazzini Lab recommends that all partners follow a similar approach through their own channels and keep growing the project's social media channels.

6. Consolidated feedback and recommended adjustments

This section turns the validation evidence into concrete actions. Table 18 lists eighteen recommended adjustments. The first twelve come from the survey, and for ten of them the focus groups add evidence (labelled FG); the last six come from the focus groups alone. FG references (R1–R12) are the focus group recommendations in Table 12 (Section 4.4). Each one is linked to the evidence behind it and to the output where it should be implemented: the final competency framework, the training course (WP3) or the ESG Knowledge Box (WP3). Priority reflects how often an issue was raised and how strongly it affects validity and uptake.

Table 18. Feedback-to-action matrix

#	Issue raised	Evidence	Recommended adjustment	Output	Priority
1	Overlaps and uneven scope of competencies	Q1/Q2 comments (6); FG: seven groups saw overlaps (see row 16)	Editorial review to merge or sharpen overlapping competencies and harmonise scope; keep the 4-domain architecture	Framework	High
2	Inconsistent count (29 vs 31) and title–description mismatches	Q1, Q2 comments	Explain that 29 competencies were assessed in the needs analysis and 2 added from qualitative research; align titles and descriptions	Framework	High
3	Technical or academic language	Q2 = 82.4%; 7 comments; FG: terminology and glossary (R6, 7 groups)	Plain-language summaries per competency; ESG glossary; visual one-page overview	Framework, Knowledge Box	High
4	Examples not realistic for small institutions	Q2, Q4 comments; FG: examples and templates (R5, 7 groups)	Add low-cost, small-institution examples for each domain	Framework, WP3	High
5	Levels read as a linear hierarchy	Q3 comments (6); FG: R1 and R2 (7 and 5 groups)	State that the EQF mapping is indicative; describe levels by scope of ESG responsibility; allow different levels across domains	Framework	High

#	Issue raised	Evidence	Recommended adjustment	Output	Priority
6	Missing roles in level descriptors	Q3 comments (7)	Add example roles: educators/mediators, producers, project managers, communication/digital, technical, collections, art-logistics and archive roles	Framework	Medium
7	Heavy for small and medium institutions	Q4 = 74.5%; museums 57.7%; FG: entry layer and pathways (R3, R4, 6 groups each)	Create a "Core ESG4GLAM" entry pathway and a self-assessment checklist with short explanations	Knowledge Box	High
8	Tools and training packages not easy to find	Q4 comments; FG: tools (R5, 7 groups)	Link each competency to Knowledge Box resources; publish an annotated toolbox	Knowledge Box	Medium
9	Training sequencing	Q6: CC 51%, SOC 42%; FG: CC-06 named by six groups, CC-02, CC-04 and GOV-04 by four	Start the 35-hour course with a Cross-Cutting foundation module, followed by Social, Environmental and Governance modules	WP3 course	High
10	Different priorities by institution type	Q6 by type; FG: pathways (R4, 6 groups)	Offer elective pathways (library, museum, archive, wider ecosystem) within the modular structure	WP3 course	Medium
11	Organisational readiness and box-ticking risk	Q4 comments (4); FG: CC-04 named by four groups	Strengthen change-management and "beyond box-ticking" content (CC-03, CC-04) with practical exercises	Framework, WP3	Medium
12	Language barriers	Q2 comments; FG: R7 (3 groups)	Translate the core framework and training materials into partner languages (IT, LV, FI, SR)	WP3, WP5	Medium
13	Emergency preparedness limited to environmental emergencies (ENV-07, GOV-03)	FG: R9 (3 groups, 2 partners)	Reframe as all-hazards preparedness with country-adaptable examples; clarify the ENV-07 and GOV-03 boundary	Framework	Medium
14	Scope and placement of CC-06 questioned	FG: R10 (4 groups, 4 partners)	Decide whether to keep CC-06 as one competency with a wider scope or to split digital preservation from responsible AI; add the missing examples	Framework	High

#	Issue raised	Evidence	Recommended adjustment	Output	Priority
15	Added value over existing standards and funder expectations unclear	FG: R11 (8 groups, 5 partners)	Add a positioning section (ICOM, IFLA and ICA codes, SDGs, Spectrum, EcoCompass) and show how the framework fits planning and reporting; plan mapping tools	Framework, Knowledge Box	High
16	Unclear boundaries in the ESG data cluster (CC-05, ENV-08, GOV-06, GOV-07)	FG: R8 (6 groups, 4 partners)	Add boundary statements and cross-references; define "basic" in CC-05 and the scope of GOV-07; test merging GOV-06 with GOV-07	Framework	Medium
17	No pilot or versioning procedure before finalisation	FG: R12 (3 groups, 2 partners)	Pilot the revised framework and tools in institutions of different sizes and GLAM types; introduce transparent versioning and review	Framework, WP4	Medium
18	Unconfirmed framework version seen by the focus groups	FG: Section 4.7, Next step 1	Check the comments against the full framework version and record the version used in UN-1 and UN-2 before the level model and descriptors (R1, R2) are finalised	Framework	High

Implementation status of each action will be recorded by the Steering Committee and shown in the Version Comparison Matrix (see Table 17).

7. Conclusions

The validation shows that the ESG4GLAM Competency Framework is **recognised by the sector as a relevant, credible and useful reference**. With 102 respondents from 12 countries and a wide range of institutions, the survey gave the framework a substantial test. The results meet the approval target set in the project application: 91.2% of respondents consider the framework a valid reference tool for the European GLAM sector. The approval rate is even higher, at 93.2%, among stakeholders outside the consortium.

Five conclusions follow from the evidence:

- **The content of the framework is validated.** Nearly nine in ten respondents find the 31 competencies and four domains complete and relevant. The critical feedback concerns how the content is presented, not what it contains: no respondent identified a missing ESG domain.
- **The framework is ready to underpin training.** 94.1% agreement on Q5, with almost no difference between groups, confirms that the framework is a sound basis for the 35-hour ESG4GLAM course. Even respondents who doubt that their institution can implement it (22 of 26) see it as a learning framework, so it can move directly into WP3.
- **Usability is the main area for improvement.** Practical applicability (74.5%) is the only criterion clearly below the 90% benchmark. The barriers are structural (time, money and staff) and relate to scale. Simplification, plain language and practical tools are therefore needed for the framework to be adopted, not only accepted.
- **The level model needs revision.** Survey respondents accept the idea of progression (82.4%) but reject a strictly linear reading. The focus groups go further: they judge the level structure not supported in its current form and ask for levels assessed per competency, decoupled from job titles and seniority, with richer descriptors (R1, R2, provisional pending the version check). Defining the levels by scope of ESG responsibility and broadening the example roles will make the model fit the varied career paths in the sector.

- **One framework should be used through differentiated pathways.** Libraries, museums, galleries, archives and the wider cultural ecosystem share a common ESG foundation but differ in priorities and constraints. A common Cross-Cutting core with differentiated pathways is the best way to keep the framework valid across European GLAM contexts.

The validation also confirms that the WP2 process worked as intended. Competency needs identified in the needs analysis, especially the large Cross-Cutting gap, are reflected in stakeholders' training priorities. The framework built on that evidence has been accepted by the professionals it describes. The ten focus groups confirm the relevance and breadth of the architecture and the importance of usability, and they qualify the survey's positive reading of the level model: every group raised points on the levels, and seven asked to decouple them from job titles. The focus groups also add targeted content questions (CC-06, emergency preparedness, the ESG data cluster) and a check of the level comments against the full framework version, which must be completed before the level recommendations are final (Section 4.7).

8. Future directions

8.1. Finalising the competency framework

The Steering Committee should review the feedback-to-action matrix (Section 6) and approve a final version of the framework. Priority should go to the editorial consolidation of overlapping competencies, the explanatory note on the EQF mapping and levels, the broader set of example roles, and a plain-language summary layer. The final version should keep a change log so that the integration of stakeholder suggestions can be documented transparently. The next steps arising from the focus groups (Section 4.7) should be sequenced with this review. The first is to confirm which version of the framework each focus group saw, because the level-related recommendations R1 and R2 are provisional until then.

8.2. Designing the ESG4GLAM training course (WP3)

The validation gives clear design guidance for the training course, which consists of seven modules of about five hours each:

- start with a **Cross-Cutting foundation module** (ESG literacy, links between E, S and G, digital sustainability and responsible AI) for all learners;
- place **Social** competencies early in the sequence, given their high priority among libraries and their link to the public mission of GLAM institutions;
- build **Environmental** and **Governance** modules around realistic, low-cost cases from small and medium-sized institutions;
- offer **elective pathways** by institution type and organisational size within the modular structure;
- use the competency levels to **differentiate learning outcomes** (awareness, application, leadership) and not to restrict access by job title.
- draw on the **course design signals from the focus groups**: short modular e-learning with practical workshops that produce a real institutional output, free choice of modules, recognition such as micro-credentials or open badges, and a pilot in institutions of different sizes (Section 4.3.8).

8.3. Developing the ESG Knowledge Box

Many of the practical requests from respondents can be met through the ESG Knowledge Box. Its development should include a self-assessment checklist based on the framework, a glossary of ESG terms for cultural professionals, an annotated toolbox linked to each competency, and case studies from libraries, museums, galleries and archives of different sizes and in different countries.

8.4. Testing and further validation (WP4)

The pilot testing of the training course in WP4, with three in-person groups and a wider online group, offers a second opportunity to validate the framework in use. We recommend including framework-related questions in the WP4 evaluation instruments, for example on the clarity of competencies and the fit of the levels, so that

changes in perception can be followed over time. Future data collection should record respondents' country, role and framework level directly and keep answer options fixed for the whole collection period.

8.5. Broadening the evidence base

The validation sample is concentrated in the four partner countries, and galleries and archives are under-represented. Follow-up consultations should target these groups and more EU Member States, for example through European networks such as NEMO, EBLIDA and the European Archives Group, during the dissemination phase (WP5). This would strengthen the framework's claim to be a European reference. In the longer term, the framework could inform national occupational standards and GLAM job profiles, in line with the project's objective of updating existing profiles to include sustainability competencies. A second round of validation should involve more archive and library practitioners and small or volunteer-run institutions, which the focus groups reached only in part, and should test the revised levels directly with the people who would use them.

8.6. Limitations

These findings should be read with the following limitations in mind. The survey used a non-probability sample recruited through consortium networks, and most respondents came from the four partner countries. Country was derived and not self-reported. The binary format of the core questions shows the direction of judgements but not their strength. The revision of Q7 during data collection requires harmonisation, as discussed in Section 3.6. Finally, people who chose to take part in an ESG survey may be more interested in sustainability than the average GLAM professional. The convergence of findings across groups, the sensitivity analysis and the triangulation with the focus groups reduce, but do not remove, these limitations. The focus groups have limitations of their own (Section 4.2): their 34 participants are a small purposive sample, two of the ten groups did not consist of GLAM practitioners, participants reviewed the framework rather than using it, and counts of groups show the breadth of support, not its prevalence in the sector.

References

Braun, V., & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology, 3*(2), 77–101. https://doi.org/10.1191/1478088706qp063oa

Council of Europe. (2005). *Framework Convention on the Value of Cultural Heritage for Society (Faro Convention)*. Council of Europe Treaty Series No. 199.

Council of the European Union. (2017). Council Recommendation of 22 May 2017 on the European Qualifications Framework for lifelong learning. *Official Journal of the European Union*, C 189, 15–28.

ESG4GLAM. (2026). *ESG competency needs analysis report*. Erasmus+ project 2025-1-IT01-KA220-VET-000364271.

ESG4GLAM. (2026). *ESG4GLAM Competency Framework for GLAM professionals (D2.4)*. Erasmus+ project 2025-1-IT01-KA220-VET-000364271. https://www.esg4glam.eu/esg-competency-framework/

ESG4GLAM. (2026). *Report on ESG framework for cultural sector (GLAM focused)*. Erasmus+ project 2025-1-IT01-KA220-VET-000364271.

European Parliament and Council of the European Union. (2016). Regulation (EU) 2016/679 (General Data Protection Regulation). *Official Journal of the European Union*, L 119, 1–88.

Wilson, E. B. (1927). Probable inference, the law of succession, and statistical inference. *Journal of the American Statistical Association, 22*(158), 209–212.

Annex 1 – Online validation survey instrument

The survey was published on the ESG4GLAM website (https://www.esg4glam.eu/esg-competency-framework/#esg-survey). The wording below is reproduced from the form.

#	Question	Answer options
—	Personal information: first name, last name, e-mail address; full name of the organisation you represent	Free text (mandatory)
—	Which GLAM organisation best describes what you work for?	Library / Museum / Archive / Other
Q1	Completeness and relevance: Do the 31 competencies and 4 domains cover what GLAM professionals actually need in order to work with ESG?	Yes – They are complete and highly relevant / No – Something critical is missing, or some competencies are unnecessary. If NO, please briefly specify (optional, max. 400 characters)
Q2	Clarity: Are the competency descriptions and practical examples clear enough to be understood and used by non-ESG specialists?	YES – The language and examples are clear / NO – Some terms, descriptions, or examples are unclear or unrealistic. If NO, which terms or examples should be improved? (optional)
Q3	Levels and career progression: Do the 5 progressive levels (L1 Associate to L5 Principal, mapped to EQF levels 3 to 8) accurately match real roles and career paths in GLAM?	YES – The levels match the actual professional progression in our sector / NO – The levels do not fit our organisational or career reality. If NO, what would need to change? (optional)
Q4	Practical application: Can you foresee your institution practically applying this Framework (e.g., for job descriptions, staff training, self-assessment, or strategic planning)?	YES – It can be easily integrated into our practical work / NO – The operational barriers (such as time, resources, or complexity) are too high. If NO, what is the main obstacle? (optional)
Q5	Priorities and training potential: Do you agree that this Framework serves as a useful and solid basis for the upcoming 35-hour ESG4GLAM training course?	YES – It is a valuable foundation for professional development / NO – It does not meet the learning needs of our sector
Q6	Which ESG domain should the upcoming training course prioritize first? (optional)	Cross-Cutting / Environmental / Social / Governance Competencies (multiple selection possible)
Q7	Overall, do you think this Framework is a valid reference tool for the European GLAM sector? (optional)	See Table 7 for the two versions of the answer options
—	Consent	I have read and agree to the privacy policy (mandatory)

Annex 2 – Coding frame for open-ended responses

Each respondent's comments (Q1–Q4) were read in full and assigned to one or more themes. Counts refer to respondents, not comments.

Code	Theme	Definition	Resp.
RES	Resource constraints	Time, financial or staff limitations prevent uptake	10
ROLE	Role coverage gaps	Specific roles or sub-sectors not reflected in levels or examples	7
LANG	Language and examples	Terminology too technical or academic; need for concrete, realistic examples or visuals	7
STRU	Structure and consistency	Overlapping competencies, uneven scope, naming inconsistencies, number of competencies	6
CONT	Content additions and context	Proposals for additional content or context-specific relevance	6
LEVL	Linear level model and EQF	Mismatch between expertise, hierarchy and EQF; non-linear careers	6
SCAL	Scale of organisation	Framework too heavy for small or medium institutions; levels absent in small teams	5
READ	Organisational readiness	ESG culture, colleagues' understanding, resistance to change, box-ticking risk	4
TOOL	Practical tools	Referenced tools, packages or toolbox not available or hard to find	3
ORGS	Organisational structures	ESG responsibilities dispersed across departments; organisational diversity	2

Annex 3 – Supplementary tables

Positive answers by criterion and respondent group (number of "Yes" answers / group size)

Group	n	Q1	Q2	Q3	Q4	Q5	Q7
All respondents	102	90	84	84	76	96	93
Library	38	37	33	35	32	37	36
Museum	26	20	17	18	15	25	23
Archive	6	5	6	4	4	6	6
Other	32	28	28	27	25	28	28
Latvia	34	33	31	31	28	34	32
Finland	23	17	14	15	13	20	18
Italy	22	18	19	17	18	19	20
Serbia	14	14	13	14	13	14	14
Other countries	9	8	7	7	4	9	9
Partner organisations	29	23	22	24	20	26	25
Non-partner organisations	73	67	62	60	56	70	68
Wave A (4–15 Sep)	44	35	35	33	29	38	36
Wave B (16 Sep – 5 Oct)	58	55	49	51	47	58	57

Composition of the "Other" category (n = 32)

Sub-group	n	Examples of organisation types
Higher education and research	14	Universities and universities of applied sciences, research institutes, inter-university consortium, student association
Cultural associations, foundations and public bodies	7	Heritage and historic-house associations, archive associations, European Capital of Culture, public trade and culture-finance agencies
Art market and fine-art services	6	Fine-art logistics, art insurance, art platforms, commercial gallery
Consultancy and professional services	4	Innovation, foresight and sustainability consultancies
Independent / unspecified	1	Independent professional

Annex 4 – Abbreviations used in Part 2

The table lists the abbreviations and focus group codes used in Part 2 (Section 4) and in the related tables and figures.

Abbreviation	Meaning
A2.5	Activity 2.5 of Work Package 2 (validation of the framework)
AI	Artificial intelligence
CC	Cross-Cutting (competency domain)
CEFR	Common European Framework of Reference for Languages
CSRD	Corporate Sustainability Reporting Directive
ENV	Environmental (competency domain)
EQF	European Qualifications Framework
ESG	Environmental, social and governance
ESRS	European Sustainability Reporting Standards
FM, HU, JC, MZ, UN	Focus group codes: Forum Marinum, Humak, Jelgava City Library, Mazzini Lab, University of Novi Sad (-1 and -2 = first and second session)
GLAM	Galleries, libraries, archives and museums
GOV	Governance (competency domain)
GRI	Global Reporting Initiative
ICA	International Council on Archives
ICOM	International Council of Museums
IFLA	International Federation of Library Associations and Institutions
L1–L5	The five proficiency levels of the framework (L1 Associate to L5 Principal)
PIAO	Piano Integrato di Attività e Organizzazione (integrated activity and organisation plan of Italian public bodies)
PR	Public relations
R, S	Recommendation (Table 12) and suggestion (Table 13) from the focus groups
SDGs	Sustainable Development Goals
SOC	Social (competency domain)
FM, JCL, ML, UNS	Partner abbreviations used in tables: Forum Marinum, Jelgava City Library, Mazzini Lab, University of Novi Sad