

National Digital Strategy Action Plan for 2026-2027

abreuadvogados.com



On December 29, 2025, the Action Plan for the National Digital Strategy for 2026-2027 was published, attached to Council of Ministers Resolution No. 214/2025. ("Digital Action Plan"), which repeals the 2025-2026 Action Plan, approved in Annex II of [Council of Ministers Resolution No. 207/2024](#) , of December 30.

This Digital Action Plan establishes guidelines for the implementation of the initiatives of the National Digital Strategy ("EDN"), approved by Council of Ministers Resolution No. 207/2024, of December 30, which, in turn, was drawn up in the context of the objectives defined in the program European "Digital Decade 2030" of the European Union: People, State, Businesses, and Infrastructure".

The Digital Action Plan consists of 20 actions, each of which is part of a National Digital Strategy, with the following standing out projects :

- National Artificial Intelligence Agenda,
- Digital Business Portfolio
- Digital Building Wallet
- Virtual Citizen Store
- National Data Center Plan
- Review of the National Semiconductor Strategy
- Strategic plan for a sovereign cloud infrastructure in Portugal
- New legal framework for interoperability data in public administration
- Development and approval of the implementing legislation for the Data Act [[Regulation \(EU\) 2023/2854](#)] and revision of the implementing legislation for the Data Governance Regulation
- Intellectual property rules applicable to the development and growth of start-ups
- Simplify and harmonize the national regulatory framework, aligning it with key European initiatives such as the Digital Omnibus
- Strategy for Digital and AI in Education

1- Definition of the Common Architecture for Information and Communication Technologies in Public Administration	2- Development of the Agency for Technological Reform of the State, I. P.	3- Digital innovation ecosystem in public administration	4- National Cybersecurity Strategy
EDN Initiative #8	Initiative #11 EDN	Initiative #6 EDN	Initiative #12 EDN
Noteworthy projects include the plan to	This action will result in the restructuring of the operational	The revitalization of the Collaborative Hub for Digital	Under the terms of the new Cybersecurity Legal

<p>centralize and migrate to <i>cloud</i> solutions, as well as the implementation of the shared governance and management model for information and communication technology infrastructures.</p>	<p>model of ARTE, I. P., which integrates new areas of activity and greater responsibility in the State's digital strategy.</p>	<p>aims to coordinate the State with CoLABs, CTIs, and ZLTs, as well as with sectoral artificial intelligence centers and the Center of Excellence in AI for Public Administration.</p>	<p>Framework (approved by Decree-Law No. 125/2025), the operationalization of the National Cybersecurity Strategy is scheduled to be completed by the second half of 2027.</p>
<p>5- Legislation ready for digital</p> <p>Initiative #8 EDN</p> <p>This action aims to ensure that all legislation produced is technically feasible and adapted to the digital reality.</p>	<p>6- Digital and AI in Justice</p> <p>Initiative #8 EDN</p> <p>In this context, the Strategy for Digital in Justice and the code of conduct in the field of artificial intelligence for entities in the government justice sector are noteworthy projects.</p>	<p>7- New Interoperability Framework</p> <p>Initiative #13 EDN</p> <p>The Government proposes to approve a Legal Interoperability Framework by the first half of 2026, which will define the principles, responsibilities, and conditions for information sharing between public entities.</p>	<p>8- National Data Policy</p> <p>Initiatives #13 and #16 EDN</p> <p>The Government intends to develop and approve the implementing regulations for the Data Act, as well as to review the implementing law for the Data Governance Act (Decree-Law No. 2/2025 of January 23) by the first half of 2026.</p> <p>In addition, the Sovereign Classification model for Public Administration data and the launch and implementation of the national data policy are noteworthy.</p>
<p>9- PAGE - State Management Support Platform</p> <p>Initiative #15 EDN</p> <p>PAGE will be designed to bring together the most important Public Administration data in an anonymized and secure format.</p>	<p>10- Digital Public Services of the Future</p> <p>Initiative #9 EDN</p> <p>The purpose of this action is to ensure that, by 2030, all public services are available in digital format. To this end, ARTE, I. P., will develop a set of projects such as the Digital Company Portfolio and Licencia - Licensing Simplification Platform (urban, industrial, among others).</p>	<p>11- Integrated Vision for Omnichannel Service</p> <p>Initiative #9 EDN</p> <p>The projects associated with Action #11 aim to ensure a model of service and interaction between the State, civil society, and the private sector based on physical and digital channels.</p>	<p>12- New forms of civic participation</p> <p>Initiative #4 EDN</p> <p>This action promotes initiatives such as electronic voting and the "Participa.gov" platform.</p>

<p>13- Strategic review of the National Digital Infrastructure</p> <p>Initiatives #12 #14 EDN</p> <p>The implementation of the digital strategy for infrastructure will also be the responsibility of the Portuguese Government, focusing on projects such as sovereign <i>cloud</i>, data centers, 5G connectivity, semiconductors, submarine cables, and aligning with European priorities for industrial sovereignty and competitiveness.</p>	<p>14- Support for the Digital Transformation of Companies</p> <p>Initiative #5 EDN</p> <p>The digital transformation of businesses will focus heavily on the SME business fabric, with ARTE, I. P., and IAPMEI, I. P., responsible for developing and promoting various projects relevant to the sector.</p>	<p>15- Support for Digital Innovation and Entrepreneurship</p> <p>Initiative #6 EDN</p> <p>Action #15 will focus on strengthening instruments to support the adoption of emerging technologies and promote business innovation, as well as strengthening programs to support the internationalization of the Portuguese entrepreneurship ecosystem. In terms of intellectual property, the National Institute of Industrial Property, I. P. (INPI, I. P.) and Startup Portugal will be responsible for defining and harmonizing intellectual property rules applicable to start-ups, creating incentives for the development of intangible assets.</p>	<p>16- Simple, clear, and pro-innovation digital regulation</p> <p>Initiative #11 EDN</p> <p>In line with the European Commission's legislative guidelines, the Government proposes to conduct an in-depth study on the creation of a Single Digital Regulator, as well as to align the national regulatory framework with European initiatives (e.g., the <i>Digital Omnibus</i>).</p>
<p>17- Digital Skills Pact</p> <p>Initiatives #1 and #3 EDN</p> <p>In this context, the development of training and professional retraining programs in digital skills will be a priority.</p>	<p>18- National Program for Girls in STEM</p> <p>EDN Initiative #2</p> <p>This action aims to implement the program for the integration of women in the fields of science, engineering, mathematics, and information and communication technologies.</p>	<p>19- Digital and AI in Education</p> <p>Initiative #1 EDN</p> <p>The Government will be responsible for approving and implementing the Strategy for Digital and AI in Education, which will be complemented by the implementation of the Action Plan for the Single Strategy for Children's Rights in the digital area, under the responsibility of ARTE, I. P.</p>	<p>20- National Artificial Intelligence Agenda</p> <p>Initiative #10 EDN</p> <p>With a deadline of the second half of 2027, the Portuguese Government is committed to implementing the National Artificial Intelligence Agenda.</p>



Thinking about tomorrow? Let's talk today.

Ricardo Henriques – Partner
ricardo.henriques@abreuvadogados.com

Catarina Mascarenhas – Of Counsel
catarina.mascarenhas@abreuvadogados.com

Marta Boura – Of Counsel
marta.boura@abreuvadogados.com

Catarina Rodrigues Rocha – Trainee Lawyer
catarina.r.rocha@abreuvadogados.com