TEMPLATE 2 – GAP ANALYSIS - OVERVIEW

Case number: 2025PL321307

Name Organisation under review: Sano – Centre for Computational Personalised Medicine International Research Foundation

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GAP analysis

The Charter and Code provides the basis for the Gap analysis. In order to aid cohesion, the 40 articles have been renumbered under the following headings. Please provide the outcome of your organisation's GAP analysis below. If your organisation currently does not fully meet the criteria, please list whether national or organisational legislation may be limiting the Charter's implementation, initiatives that have already been taken to improve the situation or new proposals that could remedy the current situation.

European Charter for Researchers and Code of Conduct for the Recruitment of Researchers : GAP analysis overview

Status: to what extent does this organisation meet the following principles?	Implementation:	In case of --, -/+, or +/-, please **indicate the actual "gap"** between the principle and the current practice in your organisation.	Initiatives undertaken and/or suggestions for improvement:
	++ = **fully** implemented	If relevant, list any national/regional legislation or organisational regulation currently impeding implementation	
	+/- = **almost but not fully** implemented		
	-/+ = **partially** implemented		
	-- = **insufficiently** implemented		

PILLAR 1 – ETHICS, INTEGRITY, GENDER AND OPEN SCIENCE

ETHICS AND RESEARCH INTEGRITY	++ = **fully** implemented	Sano employees adhere to commonly recognised ethical principles related to the exact scientific disciplines they deal with. Specific regulations are described in documents such as the Code of Ethics, Principles of Good Science Practices (prepared with the aid from Sano's Advanced Partners and based, among others, on The European Code of Conduct for Research Integrity), and the Resolution No. 12/2024 of the Management Board of Sano on policies related to conflict of interest management are in place at Sano to facilitate building a culture of scientific integrity and responsibility. Sano Researchers can find additional guidance in SOP-RD - Internal IP regulations and SOP-RD - Reporting Research Misconduct. Integrity is identified as one of the four Core Values of Sano (Passion, Diversity, Integrity, and Innovation). Moerover, the Code of Ethics is presented and discussed with every new employee during induction procedure. Sano employees are also obliged to comply with codes of ethics for their projects established by their grantors, e.g. Resolution of the Council of the National Science Centre of 3 March 2016 No. 39/2016 on the adoption of the principles of research integrity.	No additional legal regulations are necessary. An analysis of the internal survey indicated a need to improve the visibility of the Code of Ethics and organise relevant training to ensure that employees are fully aware of its contents. Initial training shall be followed up by Q&A sessions and short follow up trainings.

FREEDOM OF SCIENTIFIC RESEARCH	++ = **fully** implemented	Sano employees enjoy full freedom of thought, opinion and expression, as well as the freedom to define research questions, choose and develop theories and bring forward new innovative ideas, as Innovation is one of the four Core Values of Sano. Researchers have the influence on the choice of research areas to be explored by identifying new scientific problems - within the broad scope of Sano's Research Agenda and the selection of research methodologies. Sano has implemented the Principles of Good Science Practices and Internal IP Regulations. As Sano is a state-co-funded organisation, the Researchers must identify and be aware of regulations associated with spending public funds, which includes public procurement law. As Sano is a state-co-funded organisation, the Researchers must identify and be aware of regulations associated with spending public funds, which includes The Act on Liability for Breach of Public Finance Discipline, the Public Finance Act, the Public Procurement Law. Employees should also recognise the limitations on research freedom that arise from research conditions (including care, scientific/advisory/management) or operational constraints (budgetary or infrastructural) arising from the rules of the grants and due to the protection of intellectual property rights (e.g. the Copyright and Related Rights Act, the Anti-Unfair Competition Act, the Database Protection Act, the Industrial Property Act) and in accordance with personal data protection law. Employees are also obliged to comply with the rules under the Labour Code.	No additional legal actions planned.
OPEN SCIENCE	+/- = **almost but not fully** implemented	The core values and the mission of Sano adhere to the idea of Open Science, following the philosophy of 'as open as possible, as closed as necessary'. Taking into account the 'academic startup' strategy that Sano is following, the commercialisation of science and the creation of start-ups and spin-offs will not allow the sharing of all research results. Sano has introduced relevant internal regulations in: Principles of Good Science Practices, SOP-RD - Internal IP regulations, SOP-RD - Reporting Research Misconduct, SOP-RD - Research Data Management, SOP-RD - Ensuring Correctness of Research Data Processing, SOP-RD - Incoming Research Data Management. Open Access Guidelines for Sano Researchers were introduced and openly communicated internally in May 2024, based on good practices described in Horizon Europe and Horizon 2020 documentation.	Implementation of additional SOPs - Research Results Publishing Guidelines and Software Development - Good Practices.
GENDER EQUALITY	++ = **fully** implemented	Sano focuses on fostering the principle of gender equity, equality and balance in research, which is reflected in the adoption of the Gender Equality Plan for the period between 2022 and 2025 and subsequent revision. Sano works with Advanced Partners to establish a framework to attract a bigger number of female candidates by reviewing and preparing job ads so they are gender-neutral and don't discourage any potential candidates from applying. Sano offers a variety of optional benefits for employees and their families (additional medical care, additional days of paid holidays, and possibilities for partially remote work) to support the researchers in improving their work-life balance. Sano ensures equal treatment in terms of recruitment, selection, establishment and termination of employment, employment conditions, career development and access to training, all regardless of gender. Computational Medicine and, more broadly, Computer Science remain heavily dominated by male employees in Poland, recent statistics indicate that female employees constitute 15% of the total workforce, similar situation can be observed at the universities. Sano in terms of equality, non-discrimination and work-life balance operates on the basis of the Labour Code.	Revise and propose additions to the Gender Equality Plan in 2025 targeted at bringing more female researchers to Sano.
EMBRACING DIVERSITY	++ = **fully** implemented	Sano ensures equal treatment in terms of recruitment, selection, establishing and termination of employment, employment and working conditions, promotions, and access to training regardless of gender, age, ethnicity, national or social origin, religion or belief, sexual orientation, language, disability, political views, social or economic condition, full or part-time employment as well as fixed-term or permanent employment. Relevant regulations are in place: Non-discrimination Policy, Anti-mobbing and Anti-discrimination policy, and Gender Equality Plan. Anti-mobbing and Anti-discrimination Committee operates at Sano and is composed of a Human Talent team member, a Sano Management Board representative and a representative of the employees, elected in a popular vote. The Committee identifies manifestations of bullying, discrimination or sexual harassment, and advises Sano Management Board on preventing and remedying the consequences of bullying, discrimination or sexual harassment. Sano has organized a training conducted by external experts on Diversity, Equity, Inclusion and Equality.	No additional legal actions planned.

THE RESEARCHER	+/- = **almost but not fully** implemented	The strategic goals of Sano and the state of their achievement are reviewed and communicated by the Management Board during open meetings on a quarterly basis, where employees can attend, ask questions, and extend their feedback and input. Moreover, the Human Talent team meets with the Research Teams on a quarterly basis to communicate recent organisational news and address any issues. Sano has implemented the Code of Ethics and Principles of Good Science Practices as guidelines for professional attitude and accountability. All communications regarding the completion or delay of research projects are communicated in frequent team meetings, where Sano employees are made aware that they are accountable for transparent and efficient financial management and allocation of the public funding granted for the execution of research works. The Management Board organises frequent meetings with Research Team Leaders to discuss ongoing projects and scientific progress. Researchers are responsible for respecting the principle of respect for intellectual property rights and shared ownership of data in the case of collaborative research with supervisor(s) and/or other researchers or entities. They are bound in this respect by, inter alia, legal acts such as the Civil Code, the Labour Code, the Act on Copyright and Related Rights, the Act on Combating Unfair Competition, the Industrial Property Law, the Act on Protection of Databases. Employees undergo training on confidentiality rules, principles of avoiding conflicts of interest, which allows them to strengthen their professional approach and responsibility. Sano also ensures that employees comply with personal data protection rules and measures against data loss and regularly familiarises employees with them.	Prepare and implement guidelines on research fund management. An initiative to foster opportunities for knowledge exchange, especially between members of different groups, shall be introduced in the form of open trainings, lectures, and meetings to spread knowledge about internally available skills and expertise.
FREE CIRCULATION OF RESEARCHERS	+/- = **almost but not fully** implemented	Sano very highly values and encourages mobility experience. Researchers at Sano have secondment opportunities, which allow them to acquire diverse experiences for the benefit of their daily research work. As a part of the secondment, Sano Researchers visit organisations of their choice for several weeks or months to conduct research and learn best practices that can be translated to the research conducted at Sano. The Internship Regulations (which cover secondments) were introduced by Sano Management Board and are based on the provisions of the Labour Code and the Regulation of the Minister of Labour and Social Policy on the entitlements to be paid to an employee working in a state or local government unit of the budgetary sphere on account of a business trip. Sano also presents an opportunity for early-stage researchers to frequently visit the Advanced Partners and undergo onsite training with subject matter experts. Sano can not award scientific degrees. Hence, all MSc and PhD students must have external supervisors and defend their theses at different universities, which also presents an opportunity to gain mobility experience. The transferability of grants may result from the rules of the competitions and the rules set by the grantors. The provisions of the rules may impose restrictions on the transferability of grants.	Introduction of acknowledgement of mobility experience in appraisal system. Implementation of policy on research exchange programme.
SUSTAINABILITY OF RESEARCH	-- = **insufficiently** implemented	Sano's mission is to create new solutions in computational medicine for the advancement of healthcare and for the benefit of society. Sano does not have any regulations which address the sustainability of computational medicine research in reference to future policy initiatives such as the European Green Deal, 2030 Agenda and the Sustainable Development Goals.	Development of internal regulations based on EC's 'MSCA Green Charter'. Sano plans to review and utilize internally available skills and expertise in the matter, especially acquired through courses, studies and trainings.

PILLAR 2 – RESEARCHERS ASSESSMENT, RECRUITMENT AND PROGRESSION

RESEARCHERS' ASSESSMENT	-/+ = **partially** implemented	Sano has implemented different systems for the assessment of Researchers working at Sano, as well as for the evaluation of candidates for research positions. Each year (or more frequently in particular cases), a Periodic Consultation Form is filled out by all employees (to evaluate the organisation and their supervisors) and supervisors (to evaluate the employees). The form allows to collect and extend feedback regarding general satisfaction, and room for improvement (for the organisation and for employees) in terms of publication record, grant acquiring, training, conference attendance, administrational burden, eagerness to collaborate, leadership skills, motivation, working conditions, needs for further development and plans for next development steps. Additionally, the senior research staff is the subject of a periodic scientific evaluation by the International Scientific Committee of Sano. For the evaluation of candidates for research positions, Sano uses forms described in sections relevant to the recruitmentt.	Formalization and introduction of a new SOP - Performance Review and Appraisal. Review and adjust the existing Periodic Consultation Form to ensure the highest possible standard of assessment. To update the assessment procedures so that it promotes Candidates' professional mobility and considers it as an asset.

RECRUITMENT	++ = **fully** implemented	Sano has implemented internal regulations in SOP - Recruitment based strictly on the International Research Agenda Programme Competition Documentation from the Foundation for Polish Science, which details the recruitment process for all research positions at Sano. The process is also described in the Sano Recruitment Policy, which is available on the Sano website. All recruitment processes for research positions are open, transparent, merit-based competitions conducted by Recruitment Committees of at least two members, preferably with PhD-level education, ensuring gender equality in the Committee if possible. Since starting the recruitment efforts for all research positions at Sano, the organisation has employed a system of quantitative assessment drafted based on the input and best practices from the University of Sheffield. The assessment system has also been reviewed and endorsed by the Foundation for Polish Science. The basic assessment sheet allows Recruitment Committees at Sano to evaluate (on a scale from 1-5) the Candidate's skills against the specific requirements for a particular project. The assessment is based on five criteria relevant to the position Motivation, Relevant skills, Soft skills, Describing previous experiences and Communication. In special cases, where employment is funded from a particular source, additional rules apply accordingly (some positions at Sano are funded by NCN grants and assessment of Candidates for positions was conducted in accordance with the regulations of a specific grant. All advertisements are posted on the Sano website, Euraxess and additional job boards relevant to the field. All posts for research jobs include a description of the working conditions (including contract length, salary, number of positions available), requirements, list of required documents including information on professional and research accomplishments. Moreover, Sano has implemented and uses an online Applicant Tracking System, which makes application easier and improves candidate experience. Recruitment is carried out in accordance with the provisions of the Labour Code (including the non-discrimination provisions) and the Personal Data Protection Act, as well as the guidelines and regulations on the eligibility of expenditure in individual projects.	To update the recruitment procedures so that the criteria will include Candidates' professional mobility to be considered as an asset.
SELECTION	+/- = **almost but not fully** implemented	All recruitment efforts at Sano are conducted by Recruitment Committees of at least two members, preferably with PhD-level education, ensuring gender equality in the Committee if possible. The Committees always consist of the Hiring Manager and other senior research staff from Sano, preferably from a different Research Team. Recruitment Committees are supported by a professional Human Talent team consisting of experienced recruiters with business experience, and on a case-by-case basis, also by Project Managers. The recruitment process is explained in detail in SOP - Recruitment.	Organise training for members of Recruitment Committees on minimising biases and non-discrimination in selection.
CAREER PROGRESSION	-/+ = **partially** implemented	As a young and agile organisation which already has an established and clear structure, Sano offers a progression path for early-stage researchers to work as PhD students or postdoctoral researchers (depending on the availability of funding) or to step into different (support, technical or leadership) roles, which are evaluated on a case-by-case basis and dependant on the availability of funding. The performance of employees is assessed periodically using a Periodic Assessment Form, in which employees and their supervisors exchange feedback and plans or recommendations for professional development. In assessing the contribution of employees when co-authoring work and publications, Sano applies the Civil Code, intellectual property law, industrial property law, among others.	To introduce a progression system supporting the mobility of researchers; establish a career advisory and mentoring program to present diverse opportunities for career development. Introduce a framework for the recognition of co-authorship.
PILLAR 3 - WORKING CONDITIONS AND PRACTICES			

WORKING CONDITIONS, FUNDING AND SALARIES	++ = **fully** implemented	The working conditions of Researchers at Sano are stipulated in Work Regulations and Pay Regulations documents, in line with Labour Law in Poland and the law on the social insurance system. Contracts of employment include full social security and access to the public healthcare system. Employees at Sano all have access to the Human Resource Management system, where they can access all regulations and documents relevant to employment. Work Regulations describe in detail the salary scheme and salary brackets for each position at Sano. Moreover, Sano employees are entitled to use a Social Fund for a co-financing of vacations for themselves and their families. The Researchers at Sano, when starting, are offered contracts of employment for a trial period of 3 months, an extension for up to one year after a positive evaluation and a further extension for an indefinite period (depending on the position and availability of funding). Sano offers flexible working hours, partly remote work, part-time work and additional benefits - co-financing of sports cards for employees and co-financing of private medical care for the employees and their immediate families. Employees with fixed-term or part-time contracts have access to training and nonwage benefits to the same extent as permanent employees. Sano provides the necessary equipment and partial reimbursement of costs arising from working from home. The trained and professional Human Talent team help Sano employees address their complaints and concerns and resolve any potential conflicts. At Sano, all activities and work are undertaken in accordance with national health and safety regulations, in particular the Labour Code and the relevant implementing regulations (e.g. on fire protection, on general health and safety regulations, on health and safety at work in workplaces equipped with screen monitors, on the list of onerous, dangerous or harmful work for the health of pregnant women and breastfeeding women, on determining the circumstances and causes of accidents at work). Sano has qualified support staff to ensure that researchers are adequately supported in carrying out their research and projects in relation to their grants. The terms and conditions of employment and remuneration are also affected by grant agreements and related regulations, including on the eligibility of expenditure.	
STABILITY OF EMPLOYMENT	++ = **fully** implemented	In line with the Labour Law in Poland, Sano, like every employer, can offer a maximum of three fixed-term contracts to an employee for a period not longer than 33 months (with exceptions reviewed on a case-by-case basis by the State Labour Inspection). By default, the Researchers at Sano, when starting, are offered contracts of employment for a trial period of 3 months, an extension for up to one year after a positive evaluation and a further extension for an indefinite period (depending on the position and availability of funding). To support the mobility of researchers and help them gather various experiences, by default the PhD Students at Sano are offered a period of four years for the completion of their research, and positions for postdoctoral researchers are funded by Sano for up to two years. The Postdoctoral Researchers who wish to continue their work with Sano are encouraged (with the assistance of their Research Team Leaders and relevant Sano Support employees) to apply for grants and external funding to support the continuation of their research at Sano. Employees under contracts for definite period (as well as part-time employees) have exactly the same access to social security, healthcare as well as internal, non-financial benefits.	
CONTRACTUAL AND LEGAL OBLIGATIONS	++ = **fully** implemented	Sano employees adhere to regulations governing the working and training conditions stipulated by the Labour Law, Sano Statute, the Work Regulations, IP management regulations and any agreements with external funding institutions. In case of questions and doubts, Sano has an internal legal department, which organises open training and advises the researchers on legal matters if needed and regular training in scope of confidentiality rules, conflicts of interest, rules on notification of infringements or possible infringements. Sano employs a professional and trained GDPR officer who advises on all GDPR-related issues, which is crucial in the field of computational medicine and working on human data. Given the nature of research performed at Sano, gathering and safety of research data is a highly important issue and Sano employees have access to frequent trainings on safety performed by internal GDPR Officer. Researchers are made aware of the agreements relating to their work, their conditions and limitations, and have access to them in English.	

DISSEMINATION AND EXPLOITATION OF RESULTS	+/- = **almost but not fully** implemented	Activities concerning the dissemination and exploitation of Sano research results include publishing in high-impact journals, presentations at weekly Sano Seminars, organisation of events (like Sano Science Day) as well as participation in both national and international conferences, including preparing conference publications and posters. Sano has introduced guidelines for IP management in SOP-RD - Internal IP regulations, as well as a commercialisation strategy - researchers have access and are encouraged to work closely with a Business Development team of two senior professionals experienced in the transfer of technology to business. Sano employs a professional innovation and marketing team to help ensure that the activities of Sano researchers are made known to society. Open Access Guidelines for Sano Researchers were introduced and openly communicated internally in May 2024, based on good practices described in Horizon Europe and Horizon 2020 documentation.	Implementation of additional SOPs - Research Results Publishing Guidelines. Implementation of Open Science Policy.
PILLAR 4 - RESEARCH CAREERS AND TALENT DEVELOPMENT			
VALUING DIVERSE RESEARCH CAREERS	+/- = **almost but not fully** implemented	Sano does recognise the value of diversity in the workplace in terms of inter/intranational, intersectoral, transdisciplinary and inter-institutional mobility and strives to build and enhance the teams to reflect that. Sano employs recognized senior specialists in their respective fields, coming with variety of backgrounds (computer scientists, biologists, biochemists, chemists, clinicians), working histories (academia, business, startup environment, VC), geographies. Sano organises networking events (like Sano Science Day 2023 and 2024), which allow for cross-disciplinary networking with guests and across different Sano teams to encourage diverse contributions and collaborations.	Introduction of a career advisory and mentoring program to present diverse opportunities for career development to the researchers at Sano. Introduction of the recognition of professional mobility in recruitment and employee assessment.
CAREER DEVELOPMENT AND ADVICE	+/- = **almost but not fully** implemented	Sano offers a progression route for early-stage researchers to work as PhD students or postdoctoral researchers (depending on the availability of funding) or to step into different roles, which are evaluated on a case-by-case basis. Contracts for PhD students and postdoctoral researchers at Sano are fixed-term by default, to foster a diverse, inter-institutional research environment and encourage mobility. Sano strives to help the employees develop a skillset which will make them top candidates on the market (through publishing high-quality research work, training, networking and conference attendance). If assistance in finding a next job is sought after by a leaving employee, support is offered by the Human Talent team (experienced recruiters) and the Business Development team. Sano offers access to a vast European network of scientists through its academic partners (including the University of Sheffield and Fraunhofer ISI), commercial partners, and the International Scientific Committee. Relevant processes are described in Deliverable 4.3 - Human Talent Management Policies.	Introduction of a mentoring program for early-stage researchers, utilising the diverse experience of senior Sano employees (from academia, business, and funding agencies) to help Sano employees find relevant place on the market.
CONTINUOUS PROFESSIONAL DEVELOPMENT	++ = **fully** implemented	Sano employees have an opportunity to attend a wealth of internal as well as external training and endeavours dedicated to the professional development of employees. All Sano employees are encouraged to find and apply for relevant training, which is reviewed and decided on by the supervisor (depending on the budget availability) and processed by Sano's Support department - the procedure is described and available for all employees in SOP - Training. Internal trainings are either organised by Sano Advanced Partners (University of Sheffield, Klaster Life Science Krakow) or conducted by Sano employees based on their expertise or skills acquired during previous individual courses. Sano employees can attend frequent trips to the University of Sheffield for organised training. Sano supports networking opportunities by organising trips to scientific conferences worldwide, according to a plan which employees develop with their supervisors. Sano also organises weekly Seminars given by Sano employees or external collaborators on scientific topics relevant to Sano's Research Agenda. Sano does not offer teaching opportunities by itself, although the organization encourages it among the researchers, taking advantage of a local university network. Additionally, relevant processes are described in Deliverable 4.3 - Human Talent Management Policies.	

SUPERVISION AND MENTORING	++ = **fully** implemented	Sano's organisational structure is clearly defined and presented, and each role has an outlined direct line manager responsible for scientific as well as organisational supervision. The Leaders of Research Teams at Sano are responsible for the professional development of the group members, in addition to verifying the quality of research works carried out in their groups, reviewing the research works on a regular basis and overseeing the execution of the Research Agendas for all teams. Early-stage (R1 and R2) researchers have the possibility to discuss and communicate with their Sano supervisors on a daily basis. As Sano is not eligible to grant scientific titles, all PhD students and MSc/BSc students have external university supervisors/advisors at their respective title-awarding institutions. Sano supervisors collaborate closely with external supervisors and share the mentoring responsibilities so each student can benefit the most.	Introduction of a mentoring program for early-stage researchers, utilising the diverse experience of senior Sano employees (from academia, business, funding agencies). Introduction of additional mentoring, coaching and management trainings.