

INDEPENDENT REPORTING MECHANISM:

FINLAND

PROGRESS

REPORT 2013–14

Open
Government
Partnership

INDEPENDENT
REPORTING MECHANISM



Oxford Research
First Progress Report

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Executive Summary



Independent Reporting Mechanism (IRM) Progress Report 2013–2014

Finland’s first action plan resulted from an open participatory process and covered a wide variety of relevant commitments. However, many commitments consisted of unspecific actions, and only seven commitments were considered of significant potential impact. If the next plan includes clearer and more ambitious goals, developed and monitored jointly with civil society, then OGP in Finland may become a more relevant process in changing the way the government and civil society interact.

The Open Government Partnership (OGP) is a voluntary international initiative that aims to secure commitments from governments to their citizenry to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. The Independent Reporting Mechanism (IRM) carries out a biannual review of the activities of each OGP participating country.

Finland began its formal participation in May 2012, when Henna Virkkunen, Minister of Public Administration and Local Government, declared Finland’s intention to participate in the OGP.

A single agency leads the OGP process in Finland, the Department of Administration Policy at the Ministry of Finance. This ministry appointed a working group to develop the action plan and to monitor implementation, which includes representatives from the other ministries involved in the OGP process, a representative from the Association of Finnish Local and Regional Authorities, an academic, and representatives from civil society organisations (CSOs). After the government approved the action plan, a working committee that included representation from two other ministries and several state agencies complemented this working group.

OGP PROCESS

Countries participating in the OGP follow a process for consultation during development of their OGP action plan and during implementation.

The working committee opened up the consultation to all stakeholders. The Ministry of Finance organised or joined over ten events in consultation with the multi-stakeholder OGP working group to promote the OGP process and gather feedback for developing the plan. Officials published invitations on the Otakantaa.fi consultation platform, the OGP Finland Facebook group, and the Ministry of Finance Twitter account. The IRM researchers estimate that 10–20 CSOs were actively involved in developing the plan.

The same OGP working group of CSOs and civil servants appointed to oversee development of the plan also monitored its implementation. The government organised several public events to inform participants about the contents of the plan and actions that it took, but with little influence on the implementation of OGP activities.

The government provided a detailed self-assessment in due time, but it lacked information on the implementation of commitments and milestones.

At a glance

Member since: 2012
 Number of commitments: 18
 Number of actions: 46

Level of Completion

Completed: 1 of 18
 Substantial: 9 of 18
 Limited: 7 of 18
 Not started: 1 of 18

Timing

On/ahead of schedule: 5 of 18

Commitment Emphasis:

Access to information: 13 of 18
 Civic participation: 11 of 18
 Accountability: 5 of 18
 Tech & innovation for transparency & accountability: 3 of 18

Number of Commitments that Were:

Clearly relevant to an OGP Value: 18 of 18
 Of moderate or transformative potential impact: 8 of 18
 Substantially or completely implemented: 10 of 18
 All three (★): 4 of 18

COMMITMENT IMPLEMENTATION

As part of OGP, countries are required to make commitments in a two-year action plan. The cross-cutting theme of the Finnish plan is citizens' participation. The plan includes four thematic clusters: Open Procedures, Clear Language, Open Knowledge, and Government as an Enabler. The four themes contain 18 commitments comprised of 46 actions. The following tables summarise each commitment, its aggregate potential impact, the level of completion of the commitment, and its milestones, and whether this completion falls within Finland's planned schedule. They also indicate whether future OGP action plans should include the commitment, in part or in whole.

Table 1: Assessment of Progress by Commitment

COMMITMENT SHORT NAME	POTENTIAL IMPACT				LEVEL OF COMPLETION				TIMING	NEXT STEPS
	NONE	MINOR	MODERATE	TRANSFORMATIVE	NOT STARTED	LIMITED	SUBSTANTIAL	COMPLETE		
<p>✦ COMMITMENT IS SPECIFIC AND MEASURABLE, CLEARLY RELEVANT TO OGP VALUES AS WRITTEN, HAS SIGNIFICANT POTENTIAL IMPACT, AND IS SUBSTANTIALLY OR COMPLETELY IMPLEMENTED.</p>										INCLUDE THIS COMMITMENT, IN PART OR IN TOTAL, IN THE NEXT PLAN?
Theme 1: Open Procedures										
<p>✦ 1.1: Enhancing the openness of preparatory processes</p>									Behind schedule	Yes
1.1.1: Develop the government's online project register									Behind schedule	No
1.1.2: Making decision processes more traceable by publishing clear and popular process maps									Behind schedule	No
1.1.3: Extend the principles of the consultation guidelines of legislative work to the rest of the state administration									Behind schedule	No
1.1.4: Endorse the "Open Government Principles for Civil Servants"									On schedule	Yes
1.1.5: Support and market the new citizens' participation portal									On schedule	No
1.1.6: Collect voluntary commitments from state agencies and municipalities on how they will promote openness									On schedule	No
1.1.7: Join the Open Budget Index program in 2014					Withdrawn				N/A	No
1.1.8: Study other ways of increasing openness as part of the Local Government Act reform									On schedule	No
<p>✦ 1.2: Emphasising dialogue skills in the job descriptions of civil servants</p>									Behind schedule	Yes
1.2.1: Highlight dialogue skills									Behind schedule	Yes
1.2.2: Arrange trainings for customer-oriented service design									On schedule	No

COMMITMENT SHORT NAME	POTENTIAL IMPACT				LEVEL OF COMPLETION				TIMING	NEXT STEPS
	NONE	MINOR	MODERATE	TRANSFORMATIVE	NOT STARTED	LIMITED	SUBSTANTIAL	COMPLETE		
<p>★ COMMITMENT IS SPECIFIC AND MEASURABLE, CLEARLY RELEVANT TO OGP VALUES AS WRITTEN, HAS SIGNIFICANT POTENTIAL IMPACT, AND IS SUBSTANTIALLY OR COMPLETELY IMPLEMENTED.</p>										INCLUDE THIS COMMITMENT, IN PART OR IN TOTAL, IN THE NEXT PLAN?
1.3: Strengthening proactive publishing and communication									On schedule	Yes
1.3.1: Study regulatory ways to enhance proactive communication in municipalities									On schedule	Yes
1.3.2: Emphasise proactive communication in trainings for the Action Programme on eServices and eDemocracy (SADe)									On schedule	Yes
1.4: Promoting participatory budgeting									Behind schedule	Yes
1.4.1: Spread information about existing practices and experiences with participatory budgeting									Behind schedule	No
1.4.2: Study possibility of a game-like application for citizens for alternative budgeting									Behind schedule	No
1.4.3: Search for pilot municipality for participatory budgeting									On schedule	No
1.4.4: Search for pilot government agency for participatory budgeting									Behind schedule	Yes
1.4.5: Evaluate possibility to promote participatory budgeting through legislation									On schedule	No
1.5: Increasing openness and customer orientation in Information and Communication Technology and e-services development: Design, test, and implement user services with test groups									On schedule	Yes
1.6: Increasing the number of open and online meetings: Gather and share good practices of organising open meetings and co-production of texts									Behind schedule	Yes
Theme 2: Clear Language										
2.1: Drafting standard language titles of government proposals: Give all draft legislation a concise title and, if possible, write the main content of the law in plain language									Behind schedule	Yes
2.2: Visualisation of decisions: Visualise the state budget “what do I get with my tax euros?” and the budget of the Programme of eServices and eDemocracy (SADe)									Behind schedule	Yes

COMMITMENT SHORT NAME	POTENTIAL IMPACT				LEVEL OF COMPLETION				TIMING	NEXT STEPS
	NONE	MINOR	MODERATE	TRANSFORMATIVE	NOT STARTED	LIMITED	SUBSTANTIAL	COMPLETE		
<p>★ COMMITMENT IS SPECIFIC AND MEASURABLE, CLEARLY RELEVANT TO OGP VALUES AS WRITTEN, HAS SIGNIFICANT POTENTIAL IMPACT, AND IS SUBSTANTIALLY OR COMPLETELY IMPLEMENTED.</p>										INCLUDE THIS COMMITMENT, IN PART OR IN TOTAL, IN THE NEXT PLAN?
<p>2.3: Training for civil servants in the use of clear and plain language: Create a program to develop the use of plain text in government documents</p>								On schedule	No	
<p>2.4: User testing of public administration texts: Test the comprehensibility of texts produced by the public administration, with citizens and service users</p>								Behind schedule	No	
<p>★ 2.5: Standardising and clarifying the terms used in public administration and services</p>								On schedule	No	
<p>2.5.1: Provide a stable, sustainable operational environment and model for ontology work</p>								On schedule	No	
<p>2.5.2: Make names of administrative organisations and programs comprehensible</p>								On schedule	No	
<p>2.6: Increasing readability of standard texts in customer letters and decisions</p>								Behind schedule	Yes	
<p>2.6.1: Organise a phrase-based writing seminar</p>								On schedule	Yes	
<p>2.6.2: Developing a phrase-based writing pilot</p>					Withdrawn			N/A	Yes	
<p>2.6.3: Include simple standard text in ICT guidelines</p>								Behind schedule	Yes	
Theme 3: Open Knowledge										
<p>3.1: Opening and publishing new data and changing existing open data into a machine-readable form</p>								Behind schedule	Yes	
<p>3.1.1: Study the possibility to open more documents in a structured form</p>								Behind schedule	Yes	
<p>3.1.2: Publish data about government datasets in one portal</p>								Behind schedule	No	
<p>3.1.3: Promote openness in ICT procurement and architectural principles</p>								Behind schedule	No	
<p>3.1.4: Consider publishing analytical tools and research</p>								Behind schedule	No	
<p>3.1.5: Open data reserves central to government openness, like the project portfolio of State administration ICT projects</p>								Behind schedule	Yes	

COMMITMENT SHORT NAME	POTENTIAL IMPACT				LEVEL OF COMPLETION				TIMING	NEXT STEPS
	NONE	MINOR	MODERATE	TRANSFORMATIVE	NOT STARTED	LIMITED	SUBSTANTIAL	COMPLETE		
<p>✦ COMMITMENT IS SPECIFIC AND MEASURABLE, CLEARLY RELEVANT TO OGP VALUES AS WRITTEN, HAS SIGNIFICANT POTENTIAL IMPACT, AND IS SUBSTANTIALLY OR COMPLETELY IMPLEMENTED.</p>										INCLUDE THIS COMMITMENT, IN PART OR IN TOTAL, IN THE NEXT PLAN?
<p>✦ 3.2: Clear terms of use of open data and knowledge: Produce a public sector recommendation of terms of use based on international practice</p>									Behind schedule	Yes
<p>3.3: Strengthening the citizen's right to personal information</p>									Behind schedule	Yes
<p>3.3.1: Study options for citizens to be able to check their registered personal information</p>									Behind schedule	Yes
<p>3.3.2: Build a viewing function for citizens' personal data and right to re-use personal data</p>									Behind schedule	Yes
<p>3.3.3: Organise a seminar on combining open data and data privacy, with the open data community and experts</p>									Behind schedule	Yes
<p>3.3.4: Create a stable operational environment to produce open data support services and tools</p>									Behind schedule	Yes
<p>Theme 4: Government as an Enabler</p>										
<p>4.1: Removing barriers of action for civil society</p>									Behind schedule	Yes
<p>4.1.1: Launch campaign "inform about barriers" to report obstacles in the public administration</p>					Withdrawn				N/A	Yes
<p>4.1.2: Update consultation guidelines to always include a commitment to process results</p>									Behind schedule	Yes
<p>4.1.3: Monitor and report on the creations of open data apps</p>									Behind schedule	No
<p>4.2: Proactive presence and accessibility of civil servants</p>									Behind schedule	Yes
<p>4.2.1: Create a voluntary openness agent's role and spread to all agencies</p>									On schedule	Yes
<p>4.2.2: Award a yearly prize to agents of the public administration for enabling civic society action</p>									Ahead of schedule	No
<p>4.3.3: Offer training to civil servants in engaging citizens in consultation processes</p>									Behind schedule	No
<p>4.3: Providing web tools and training to civil society organisations</p>									Ahead of schedule	No
<p>4.3.1: Map need for tools and training</p>									On schedule	No
<p>4.3.2: Offer tools and training on using those web tools</p>									Ahead of schedule	No

Table 2: Summary of Progress by Commitment

NAME OF COMMITMENT	SUMMARY OF RESULTS
<p>★ 1.1: Enhancing the openness of preparatory processes</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Moderate • Completion: Substantial 	<p>The decision-making processes in government and law drafting can often be complex. Two of the central goals of this commitment were making preparatory processes open at the earliest stage possible and improving electronic services such as the government’s online project register HARE. The IRM researchers consider the commitment as a whole substantially complete. The government realised four milestones in accordance with the goals of the plan:</p> <ul style="list-style-type: none"> • Development of the government’s register project is advancing, but not complete. • The Permanent State Secretaries have signed common principles on open government, committing to act as their ministries’ “openness leaders.” • The draft on the reform of the Local Government Act, open for comments until late August 2014, includes the topic of openness of preparatory processes. • The Ministry of Justice has promoted e-participation platforms at events related to OGP. On the municipal level, they are included in the <i>Kuntalaiset keskiöön</i> project. <p>Two milestones were implemented differently from the action plan:</p> <ul style="list-style-type: none"> • The government will implement publication of process maps in a separate project in 2015 as it updates and approves the core preparatory processes. • Officials published voluntary commitments from agencies and municipalities to promote openness on the online project register HARE, but communication to the public about these commitments has not been systematic. <p>Two milestones are behind schedule in their implementation:</p> <ul style="list-style-type: none"> • Officials are preparing the update of consultation guidelines. Work in the Ministry of Justice began late, in Autumn 2014, due to the <i>Lausuntopalvelu.fi</i> platform for statutory consultation being delayed by a challenging procurement process. • Finland did not join the Open Budget Index. It had not previously investigated the procedures for joining, and it turned out that states are not eligible to join. <p>The government faced challenges from the variety of milestones and division of responsibility across agencies. While the commitment set ambitious goals, the milestones would have only minor or moderate impact. The IRM researchers recommend that this commitment be included in the next action plan with more concrete milestones and clear responsibilities. If the government completes the milestones, the IRM researchers recommend that the next plan involve the Permanent State Secretaries in ensuring the implementation of openness initiatives on a broader scale. The updated commitment should include an accountability mechanism so that civil society and civil servants alike can ensure the officials follow and implement openness principles. Furthermore, the IRM researchers suggest that officials continue to collect voluntary commitments, but the communication of these commitments to the public should be more systematic, for example, by publishing the commitments on a single webpage and also visibly linking the information on government and municipality websites.</p>
<p>★ 1.2: Emphasizing dialogue skills in the job descriptions of civil servants</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Moderate • Completion: Substantial 	<p>This commitment aimed to change public recruitment and performance. The Ministry of Finance organised a workshop on communication skills for government employees. On the municipal level, officials organised training sessions for civil servants in conjunction with the <i>Kuntalaiset keskiöön</i> project, which included perspectives on service design. However, officials did not create the guidance materials or the recruitment criteria guidelines for assessing performance. The IRM researchers consider the commitment as a whole substantially complete. The idea behind the commitment is ambitious, but the milestones were not. One key challenge was the distribution of responsibility. The government should move forward with recruitment guidance criteria and should carry out training for civil servants responsible for recruitment, so they are able to implement the guidelines as intended. In the case of customer oriented service design, the IRM researchers consider this an important topic but suggest that it should not be included in the same commitment as recruitment criteria.</p>
<p>1.3: Strengthening proactive publishing and communication</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Minor • Completion: Substantial 	<p>Though limited in scope, this commitment aimed to enable proactive communication and consultation regarding projects in their earliest stages of development. Previously, officials made projects public only when becoming “official.” The SADE program, focusing on the improvement of eServices and eDemocracy, emphasised proactive communication through training officials. The Ministry of Finance and the Association of Finnish Local and Regional Authorities are evaluating possible regulatory ways for including proactive communication in the updated Local Government Act. The current draft states that municipalities should proactively share projects, and it was up for comment until the end of August 2014. This could have a significant potential impact and should be included in the next plan. Which further municipal level measures to take depends on how the Local Government Act includes proactive communication. But proactive communication has to be part of the organisational culture, so the IRM researchers suggest measures like more focused training for civil servants.</p>

<p>1.4: Promoting participatory budgeting</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Minor • Completion: Limited 	<p>Participatory budgeting is a new tool whereby the government makes participation results visible and understandable through its resulting budgeting decisions. This commitment aimed to promote participatory budgeting through several activities. Officials are updating the Local Government Act to include participatory budgeting, and the current draft features a paragraph on this topic. Some municipalities are reportedly interested, but the majority is unlikely to try a process that is not set in legislation. A key challenge is the significant differences between municipalities in size, population, and budget. The government gathered information about participatory budgeting practices prior to the plan, for the reform of the Local Government Act. It distributed this information at events where citizen participation was a topic, but without a specific public seminar. Stakeholders did not conduct a research study on an alternative budget app. Officials identified two pilot cities, Tampere and Vantaa, but further program information is not available. Additionally, it did not find a pilot government agency. As a result, the IRM researchers consider the commitment as a whole only limitedly complete.</p> <p>The idea is ambitious, but the milestones focused on studying possibilities. The exception is the inclusion of participatory budgeting into the Local Government Act reform, which has the potential to impact participation in local government. If officials ratify the law, municipalities will be more aware of this method and could implement it more easily. Thus, the IRM researchers suggest including participatory budgeting in the next plan, if it sets clear goals. The next step in the reform of the Local Government Act would be educating municipalities on participatory budgeting or new participatory tools in general. One is the creation of a platform for municipalities to ease the setup process for participatory budgeting. However, implementing such a large-scale effort would require additional resources to be successful.</p>
<p>1.5: Increasing openness and customer orientation in Information and Communication Technology and e-services development</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Minor • Completion: Substantial 	<p>Many services are built according to public administration needs, so this commitment included designing and implementing online services with user groups. In terms of outputs:</p> <ul style="list-style-type: none"> • The new service for permits for the built environment included user testing. • Otakantaa.fi (participation) and Kansalaisaloite.fi (citizen initiatives) included a customer council and a developer community from the beginning. They also provide the option for citizens to participate in further development of the portals. • <i>Oma Yritys-Suomi</i>, aimed at new entrepreneurs, also included a customer council. <p>Still, a key challenge to the SADe program has been participation. While many developers participated, an appropriate forum for all interested parties is important. In addition, service development takes time and demands a substantial commitment. The scope of the program is also an issue; it includes seven projects across forty services. Resources are limited and many services have limited target groups. The commitment does not have to be included in the next action plan, as the pre-existing SADe program only runs until 2015 and the commitment will likely be completed as part of that program. However, the goal to further include users into development of public online services could be part of the next action plan, particularly to develop services relevant for open government. The IRM researchers recommend focusing a smaller range of services aimed at broader target groups to achieve greater impact. An example would be the eDemocracy services, such as Otakantaa.fi and Kansalaisaloite.fi.</p>
<p>1.6: Increasing the number of open and online meetings</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Minor • Completion: Not started 	<p>Before joining OGP, some municipalities and agencies used online meetings, and the OGP process did not significantly change this. However, officials recorded many meetings, including those related to OGP, and made them available on the project website. Officials did not produce the main output, information on best practices for open meetings. Therefore, new commitments could focus on training relevant actors, so that they are able to implement the practices correctly. Online meeting streaming often relies on ad-hoc solutions, and as a result, the streams and subsequent records can be challenging to find. This could be solved by providing a platform that municipalities and agencies can use for streaming and systematically archiving meetings for public use. The IRM researchers suggest that platform development include a predefined pilot, which would create content for the platform and generate interest from other officials in such a solution. Efforts for promoting online meetings on social media and other channels should also be made, as videos currently reach only small audiences.</p>
<p>2.1: Drafting standard language titles of government proposals</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Minor • Completion: Limited 	<p>From a citizen perspective, legislative texts can be challenging to understand. From a government perspective, providing clear language texts is a challenging task requiring much expertise. Before the OGP process, the government published some texts in clear language. The OGP process brought increased understanding of the importance of producing clear language text. While officials did not create guidelines or fully complete any of the several objectives, it did complete some pilots with clear language summaries. The idea behind the commitment is ambitious, but it included two clear parts and several less specific actions without timetables or measurable targets, and the milestones had a limited significance. The IRM researchers suggest that the commitment be restructured more clearly and focus on achievable goals. For example, pilot cases with a clear relevance to citizens' lives should be chosen at the time of action plan writing, preferably focusing on law drafts or government proposals that have significant societal impact. Training on clear language writing for civil servants could also be an achievable goal, specifically regarding law drafts and proposals.</p>

<p>2.2: Visualisation of decisions</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Minor • Completion: Substantial 	<p>The new Administrative Procedures Act requires public administration to use comprehensible forms of expression, for example visualisations. Before the OGP process, authorities did not commonly use visualisation. Through OGP, clear language gained momentum, but the new Administrative Procedures Act would have brought attention to clear language even without OGP. Visualisation is still not a common tool, but the government substantially met goals set in the commitment, despite challenges like officials' lack of visualisation skills. The SADE-budget was visualised and published in Autumn 2013 and will be updated in Autumn 2014. The visualisation of the state budget is planned for 2015, which falls outside of year 1 of the action plan, but officials have secured financing for this project. Additionally, the Ministry of Finance is rewarding the best visualisation of the 2015 state budget in the Apps4Finland competition. Since 2012, the government has released the state budget in machine-readable form with the 2015 budget published in September 2014. The IRM researchers suggest including the commitment in the next plan, as these actions are only first steps in increasing government use of visual communication. Officials can improve visualisation by recruiting graphic designers into agencies and providing training. They should take into account best visual communication practices; for example, they must consider continuity and visual identity, so that users can easily switch between different services and identify providers.</p>
<p>2.3: Training for civil servants in the use of clear and plain language</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Minor • Completion: Substantial 	<p>This commitment aimed to organise training in the use of clear language in ministries and agencies and to develop the use of plain text in government documents and a plain language checklist for civil servants. Before the OGP process, there were few structured efforts to improve the language used by civil servants, though KOTUS, the Institute of Languages in Finland, had highlighted the issue. After the OGP action plan, this has improved to some extent, with KOTUS reporting an increased number of requests for clear language training. In terms of outputs, a working group has initiated an action program on the issue that includes guidelines for language use for civil servants. Officials included the drafting of this action program in the Government Program 2011–2015. As a follow up, they will start a campaign on civil servant language in Autumn 2014. Officials do not necessarily need to include the commitment in the next action plan, but they should include the clear language topic.</p>
<p>2.4: User testing of public administration texts</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Minor • Completion: Limited 	<p>Large agencies previously user-tested government texts, though agencies with fewer resources did not. However, the commitment made no significant changes in intra-agency learning, and there are no clear outputs, as testing was independent of the OGP process. The pilot was not started, as the government could not find a partner agency or secure funding. The main output on the municipal level is the customer council of the social services of the city of Tampere, part of the <i>Kuntalaiset keskiöön</i> project to increase municipal democracy, and which enables customers of social services to participate in the development of services, including testing of text produced. The government should include this commitment in the next plan only if it agrees upon a suitable pilot and concrete cases for testing. The current commitment is not specific. The theme could be pursued in more ambitious clear language commitments.</p>
<p>2.5: Standardising and clarifying the terms used in public administration and services</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Moderate • Completion: Substantial 	<p>Information from the public administration can be hard to find and understand, and the terminology in many cases inconsistent. Ontologies are models where the terms used in a certain subject are put in a logical relation that is readable by computers, and eventually more easily accessible to citizens. Prior to the OGP, this ontology work was part of long-term research projects at the Ministry of Finance. A major challenge for this area is that ontology work has been project-based and the work would require greater long-term commitment due to the large scope of the task. So far, the government created an ontology service, with the national library coordinating the creation and implementation of several ontologies by other actors. However, it is difficult to assess whether this model provides the continuity required, as officials have not yet secured long-term funding. Regarding the comprehensibility of names and abbreviations, guidelines for this were included in the Report of the Working Group for Clear Administrative Language published as a result of this commitment. Thus, the government does not need to include this commitment in the next action plan. The ontology service is running but is still in need of funding necessary for continuous use.</p>
<p>2.6: Increasing readability of standard texts in customer letters and decisions</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Moderate • Completion: Limited 	<p>Citizens may find government communication hard to understand due to technical “phrase-based writing,” the inclusion of pre-written standardised texts. This commitment aimed to improve readability by organising a seminar, developing a pilot, and including the option to easily change phrase-based text in procurement and development of Information and Communications Technology (ICT) systems. The seminar took place in January 2014 and aimed to inform public servants, researchers, developers, and IT-experts. This seminar was also used, unsuccessfully, to search for a pilot municipality and agency. As only one of three milestones was completed, completion as a whole was only limited. The commitment can be considered far-reaching in its scope, but there are budgetary and coordination challenges to system wide changes. The researchers suggest including the commitment in the next plan. However, officials should identify a pilot case in advance, with required resources secured. The pilot could focus on experimenting with updated solutions to phrase-based writing. The results should be compiled for use by other agencies. If a pilot is too difficult, further training for good phrase-based writing could be more realistic.</p>

<p>3.1: Opening and publishing new data and changing existing open data into a machine-readable form</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Moderate • Completion: Limited 	<p>Documents are not often published in machine-readable form, so that searching for a topic or reusing information can be challenging. Government data were also difficult to find without a portal. As a result of the following milestones, the commitment was only limitedly complete:</p> <ul style="list-style-type: none"> • The options for opening more documents in a structured form proved to be too ambitious of an effort with the resources available. • The portal Yhteentoimivuus.fi existed prior to OGP, and officials are updating and including it into the open-data service, which officials opened in September 2014. • The process for including open data and open application interface requirements in IT procurement was drafted and up for public comment until August 2014. • Finlex, a database of legislation, had not included structural data, but was released. • Publishing the project portfolio of state administration ICT projects and government program follow-up data proved challenging due to technical issues. Some data is classified and thus cannot be opened. Neither data were opened. <p>While these results are relevant to both citizens and public administration, for the most part, other projects in the Ministry of Finance’s open data program already pursued the milestones. Still, a commitment to open data would be relevant for the next plan, so the IRM researchers suggest that a similar commitment bring together all the different efforts for opening public data. Decisions to prioritise datasets should be in collaboration with civil society stakeholders.</p>
<p>3.2: Clear terms of use of open data and knowledge texts</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Moderate • Completion: Substantial 	<p>The main output will be a Public Administration Recommendation, based on best practices, for terms of use of open knowledge. While this was planned for year 1, the work advanced more slowly than anticipated. Officials drafted the recommendation and set it up for comments, with the final step being the Finnish translation of the Creative Commons 4.0 license. Once the recommendation is complete, there will be a common standard based on a Creative Commons license. Public Administration Recommendations are not binding, but agencies generally strive to adhere to them. Thus, it is likely that the commitment will have the intended impact once the recommendation is finalised, and no further action is required.</p>
<p>3.3: Strengthening the citizen’s right to personal information</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Transformative • Completion: Limited 	<p>Before, citizens could inquire what information authorities held, but getting this information was challenging with few possibilities for re-use. In terms of outputs, evaluating options for checking citizens’ own records is part of the Service Architecture project of the Ministry of Finance. Officials will release a beta portal in Autumn 2015 and will include the option to check registry data. But this is behind the planned schedule. The commitment also aimed to create a stable operational environment to produce open data services and tools via training, related to the Ministry of Finance’s Open Knowledge Program and independent of OGP. However, the government did not organise a systematic training. The IRM researchers consider the commitment limitedly complete. Data re-use functionality would be transformative; this kind of re-use possibility is globally rare and would to a certain degree change the perception of who has ownership rights to the data gathered about citizens. Because the commitment is behind schedule, officials could use the same milestones in the next plan in a way that accounts for the progress made.</p>
<p>4.1: Removing barriers of action for civil society</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Moderate • Completion: Limited 	<p>Government and civil society representatives agreed to include in the plan a focus on enabling civil society, which resulted in this campaign where citizens could report on obstacles in public administration. Creating concrete actions proved challenging, with disagreement on the correct approach. The focus on barriers was a compromise, but with no clear definitions, some feedback was not relevant. The campaign had no budget for a website or to market the campaign, so no clear communication channel existed. Only seven barriers were reported.</p> <p>Additionally, officials were to update the consultation guidelines for law drafting so that there is a commitment to process the results, as in the past, it has not been clear when and how the government uses consultation results. The Ministry of Justice updated its guidelines, though they have not yet published these. Finally, representatives of the open knowledge community committed to reporting on the creation of open data applications. But Open Knowledge Finland has not reported developments to government officials, according to interviews.</p> <p>The commitment could have been very ambitious, but the milestones were mostly small-scale. With the exception of the updated consultation guidelines, the commitment would do little to decrease government barriers. As government only substantially completed only one of three milestones, the IRM researchers consider the commitment only limitedly complete. If included in the next plan, the campaign requires marketing and a designated site where citizens can report barriers. Instead of forwarding reports to different agencies, it should be clear who distributes the messages and who in an agency responds. Preferably, the barriers should be publicly visible and monitored. All these issues require a designated budget and clear goals. Another option is to focus on only one agency. If no resources are available, the topic should not be included. The Ministry of Justice leads the update to consultation guidelines, but the ministry and CSOs should actively monitor its implementation in other ministries. Communication between government actors and the open knowledge community could also be improved, but assigning civil society actors responsibility for commitments has been challenging due to unclear goals. Therefore, officials should not include that milestone.</p>

<p>4.2: Proactive presence and accessibility of civil servants</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Minor • Completion: Substantial 	<p>CSOs can find it challenging to respond to calls for consulting on legislative drafts and citizens can feel that they are only informed of public administration projects at a late stage. Proactive presence of civil servants can provide CSOs and citizens with better opportunities to participate. The commitment includes three milestones. As the government completed two of three milestones, the IRM researchers consider the commitment as a whole substantially complete.</p> <ul style="list-style-type: none"> • First, civil servants would voluntarily enlist as openness agents, tasked with being available to citizens. Officials asked all government agencies to appoint a responsible civil servant, contrary to the original voluntary plan. Officials also formed a network for developing open government, and they arranged three meetings between October 2013 and May 2014. They are implementing a similar municipal network. • For year 2, officials were awarding a prize to civil servants who enable civil society action in their work. Officials awarded the first annual prize ahead of schedule during Democracy Day 2013. • Additionally, civic organisations would provide training for citizen engagement in consultation processes to civil servants. Some training for civil servants has been organised, such as a course on open government data arranged by Open Knowledge Finland, but its focus does not match that of the commitment. <p>These efforts were promising but small-scale, so the IRM researchers suggest further action in the next plan. The yearly prize is already set to continue and, while successful, does not necessarily have to be included. Officials should continue appointment of open government representatives, because these networks of representatives may potentially have a larger impact, especially in the OGP process. For the next plan, they should define their tasks and responsibilities more clearly. Finally, instead of relying on CSOs to provide training, agencies could aim to, for example, organise training events where CSOs are invited as trainers.</p>
<p>4.3: Providing web tools and training to civil society organisations</p> <ul style="list-style-type: none"> • OGP Value Relevance: Clear • Potential impact: Minor • Completion: Complete 	<p>This commitment aims to provide tools and training to civil society organisations in the use of participatory platforms. In year 1, officials planned to map requirements for this and offer appropriate training and web tools. The Advisory Council for Civil Society Politics of the Ministry of Justice held discussions on types of training, and officials arranged a workshop on the topic. The conclusion was that organisations do not require additional training on the participatory tools but that there is a need to develop procedures for using what these tools offer. The Ministry of Justice organised a variety of trainings focusing on participatory methods, and officials organised more than 100 sessions by the project on participatory platforms between early 2012 and summer 2014. Some focused on presenting the platforms, but about 20 sessions focused directly on training.</p> <p>Prior to the OGP process, the participatory platforms were already under development, and training for CSOs would have been arranged independently, though OGP participation created channels for closer coordination between ministries working on the same topic. The IRM researchers do not suggest further action on the platforms for the next action plan. The Ministry of Justice dedicated resources for training that it will utilise in the future, regardless of the inclusion of this action in the next plan. The government should not halt the introduction of participatory platforms to a greater audience, which is a continuous project, but further action in the next plan should be more ambitious and have a clearer focus on specific issues related to web tools.</p>

RECOMMENDATIONS

In many ways, Finland can be considered a model of open government. However, it could still improve many issues. So far, stakeholders can generally consider the development and implementation of the first Finnish action plan a good effort. The action plan development process aimed to reach many people, and the action plan clearly included topics introduced by civil society representatives. Moreover, many activities saw some level of progress, even if overall the government did not implement many of the commitments as planned.

The IRM researchers’ recommendations address the weaknesses that were mostly related to relatively poor participation by civil society, few commitments with significant potential impact, and the approaches towards government and civil society collaboration. Recommendations also emphasise leveraging and continuing those ambitious and promising activities from the first implementation period. The following box provides five “SMART” (specific, measurable, accountable, relevant, and timebound) recommendations for improving the OGP process in Finland.

TOP FIVE 'SMART' RECOMMENDATIONS

1. Increasing participation of civil society. In order to enable participation by various civil society organisations in the OGP process, the Ministry of Finance could organise quarterly workshops during the development and implementation of the action plan, where government personally invites several civil society organisations. Online participation should also be possible. The government should document in detail the feedback received from the participants during the workshops and the way the feedback is taken into account and publish it for public monitoring on the dedicated OGP website.

2. Creating a dedicated website for OGP. In order to increase the visibility of the OGP process in Finland and to enable easy access to information related to OGP, the IRM researchers recommend that the Ministry of Finance establish a dedicated website prior to next implementation period, to be the single point for OGP related information in Finland. Officials should acquire financing during plan development, and they should use professional web designers for design and implementation. The government should adopt co-design principles and involve OGP stakeholders. Finally, the government should use the website for all OGP-related information during action plan development and implementation in the future.

3. Promoting open procedures by means of accountability and training. Increasing openness of procedures is highly dependent on the commitment of civil servants and organisational culture, which are difficult to change. The government could tackle this by means of accountability and training. In order to enforce the openness principles accepted by the Permanent State Secretaries, IRM researchers recommend that the government establish a service where both citizens and civil servants can be informed about practices in national public administration that could do better against these principles. The government would make these issues public and address them to the right agency, with an expectation that officials would also reply to them publicly. The Ministry of Finance would be in charge of establishing a project to develop the service during the first year of the second action plan implementation. In addition, officials would procure training and workshops for the civil servants from experts in order to develop capabilities related to open procedures and to promote turning the openness principles to practice.

4. Strengthening the citizen's rights to re-use his/her data by developing the government's My Data strategy. Access to information is a key value of Open Government Partnership, and access to information regarding oneself is considered a new basic human right of the digital world. It is recommended that the Ministry of Transport and Communication jointly with Ministry of Finance take the lead in developing the government's My Data strategy based on a recent report on the issue. The government would use the dedicated OGP website as a platform for regular updates and monitoring implementation, with the whole strategy development timeline visible. The strategy should involve other relevant ministries, civil society, private sector, and research institutions, and it should aim for practical implementation through IT solutions and legislative changes.

5. Involving openness networks of civil servants and municipalities in action plan development and implementation. The government has limited influence over open government issues in ministries, government agencies, and municipalities. In order to develop open government practices and further their implementation in the mentioned organisations without the need to rely on legislation, IRM researchers recommend that the networks of civil servants be used fully in developing and implementing the action plan. For example, the networks could have the responsibility of commenting on the feasibility of commitments from the viewpoint of their own agencies. In practice, the government should formalise the networks' role, develop their operating methods jointly with other OGP stakeholders, and allocate proper resourcing, particularly in terms of working time, in order to establish a solid organisation.

Eligibility Requirements 2012: To participate in OGP, governments must demonstrate commitment to open government by meeting minimum criteria on key dimensions of open government. Third-party indicators are used to determine country progress on each of the dimensions. For more information, visit <http://www.opengovpartnership.org/eligibility>.

Budget Transparency: 4 out of 4

Access to Information: *Law Enacted* 4 out of 4

Asset Disclosure: *All senior officials* 4 out of 4

Civic Participation: *9.71 of 10* 4 out of 4

Oxford Research is a specialised knowledge company focusing on the areas of industrial and regional development and welfare. Within these areas we work with knowledge and innovation systems, development of municipalities and regions, and social, educational, and labour market policies. Oxford Research was established in 1995 and has now companies in Denmark, Norway, Sweden and Finland. Oxford Research is a part of The Oxford Group.

The Open Government Partnership (OGP) aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. OGP's Independent Reporting Mechanism assesses development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.



I. National participation in OGP

The Open Government Partnership (OGP) is a voluntary, multi-stakeholder international initiative that aims to secure concrete commitments from governments to their citizenry to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. In pursuit of these goals, OGP provides an international forum for dialogue and sharing among governments, civil society organisations, and the private sector, all of which contribute to a common pursuit of open government. OGP stakeholders include participating governments as well as civil society and private sector entities that support the principles and mission of OGP.

History of OGP participation

Finland's formal participation in OGP began when Henna Virkkunen, Minister of Public Administration and Local Government, declared her country's intention to participate in the initiative in May 2012.¹

In order to participate in OGP, governments must exhibit a demonstrated commitment to open government by meeting a set of (minimum) performance criteria on key dimensions of open government that are particularly consequential for increasing government responsiveness, strengthening citizen engagement, and fighting corruption. Objective, third party indicators are used to determine the extent of country's progress on each of the dimensions, with points awarded as described below.

Finland entered into the partnership exceeding the minimal requirements for eligibility, with a high score for each of the criteria. At the time of joining, the country had the highest possible ranking (2 out of 2) for an access to information law,² the highest possible ranking in asset disclosure for senior officials,³ and a score of 9.71 out of 10 on the Economist Intelligence Unit's Democracy Index Civil Liberties subscore.⁴

All OGP participating governments are required to develop OGP country action plans that elaborate concrete commitments over an initial two-year period. Governments should begin their OGP country action plans by sharing existing efforts related to their chosen grand challenge(s) (see Section IV), including specific open government strategies and ongoing programmes. Action plans should then set out governments' OGP commitments, which move government practice beyond its current baseline with respect to the relevant grand challenge. These commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate action in an entirely new area.

Finland developed its national action plan from September 2012 to March 2013. The action plan implementation period was officially July 1, 2013 through June 30, 2015. The government published its self-assessment in September 2014. At the time of writing this report (October 2014), Finland had just started to prepare the next national action plan.

In order to meet OGP requirements, the Independent Reporting Mechanism (IRM) of OGP partnered with Oxford Research Finland to carry out this evaluation, which reviews the development and implementation of Finland's first action plan. It is the IRM's aim to inform ongoing dialogue around development and implementation of future commitments in each OGP participating country. The researcher explains methods and sources in the methodological annex in this report.

Basic institutional context

Finland is a representative democracy with executive, legislative, and judicial branches. A single agency, the Personnel and Governance Policy Department at the Ministry of

Finance, leads the OGP process in Finland. The Ministry of Finance is responsible for the overall development of national government and legislative and financial requirements of local government. Therefore, it is well placed to lead the OGP process. Municipalities are separate from the central government and have a high degree of autonomy in their decision-making and organisation, protected by the constitution and the Local Government Act.⁵ Government agencies also operate with a degree of autonomy from the ministries that supervise them. For the OGP process, this means that the Ministry of Finance's OGP team is limited in its ability to direct government agencies and municipalities. The OGP team and the ministry can make recommendations and guidelines, but to a large degree, OGP implementation in agencies and municipalities depends on the willingness of agencies and municipalities to get involved and implement changes.

The Ministry of Finance appointed a working group⁶ to develop the OGP action plan and to monitor its implementation. The working group includes representatives from other ministries involved in the OGP process (the Ministry of Justice and the Ministry for Foreign Affairs), a representative from the Association of Finnish Local and Regional Authorities, and representatives from non-governmental organisations (Open Ministry, Transparency Finland, Forum Virium) and an academic specialised in crowdsourcing. After the approval of the OGP action plan, this working group was complemented by a working committee⁷ that included representation from the Ministry of Transport and Communications, the Ministry of Education and Culture, and several state agencies.

OGP is not legally mandated in Finland, but the Ministerial Working Group on Public Administration and Regional Development formally approved the OGP action plan. The budget for OGP-related work in the Ministry of Finance was 10.000 EUR in 2013 and 40.000 EUR in 2014. In the Personnel and Governance Policy Department, four civil servants, including one secretary, allocate about 20% of their time to OGP-related work.

On 24 June 2014, a new government under Prime Minister Alexander Stubb with several new ministers replaced the government of former Prime Minister Jyrki Katainen, which had been in office since 2011. This political event did not have any significant effects on the OGP process in Finland.

Methodological note

The IRM partners with experienced, independent national researchers to author and disseminate reports for each OGP participating government. In Finland, the IRM partnered with Oxford Research Finland. Oxford Research reviewed the government's self-assessment report, gathered the views of civil society, and interviewed appropriate government officials and other stakeholders. OGP staff and a panel of experts reviewed the report.

To publicise the IRM assessment in Finland and to gather the voices of multiple stakeholders, Oxford Research participated in the Open Finland 2014 fair event organised by the Prime Minister's Office in Helsinki in September 2014. In addition, a dedicated stakeholder meeting was organised in Helsinki to hear the views of the civil society. The national public consultation forum Otakantaa.fi was also used to enable feedback from stakeholders outside the capital region.

Oxford Research reviewed a number of documents provided by the OGP point of contact in Finland, including the government's action plan⁸ and self-assessment,⁹ action plan monitoring documents, the Finnish government's OGP website and several other documents and webpages. Numerous references to these documents are made throughout this report. It is worth mentioning that information related to the original action plan's commitments was complemented with additional information from the international OGP website and from the monitoring document.

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1. Ministry of Finance, "Open Government Partnership," Open Government Partnership, <http://bit.ly/1z2d1Hi>.
 2. Finlex, "Laki viranomaisten toiminnan julkisuudesta," Finlex, <http://bit.ly/17uVhOd>
 3. Simeon Djankov, Rafael La Porta, Florencio Lopez-de-Silanes, and Andrei Shleifer, "Disclosure by Politicians," (working paper, Tuck School of Business, 2009-60, 2009), <http://bit.ly/19nDEfK>; Organization for Economic Cooperation and Development (OECD), "Types of Information Decision Makers Are Required to Formally Disclose, and Level Of Transparency," in Government at a Glance 2009, (OECD, 2009). <http://bit.ly/13vGtqS>; Ricard Messick, "Income and Asset Disclosure by World Bank Client Countries" (World Bank, Washington, DC, 2009), <http://bit.ly/1cIokyf>.
 4. Economist Intelligence Unit, "Democracy Index 2010: Democracy in Retreat" The Economist Intelligence Unit (London, 2010), <http://bit.ly/eLC1rE>.
 5. Finlex, "Local Government Act," Finlex, <http://bit.ly/1AWNwNf>
 6. Ministry of Finance, "Open Government Partnership, Suomen toimintaohjelman laatiminen," Hare, <http://bit.ly/17ZhXHx>
 7. Ministry of Finance, "Työvaliokunnan asettaminen OGP -hankkeeseen," Hare, <http://bit.ly/1zqa5FN>
 8. Ministry of Finance, "Finland's Action Plan on Open Government," Open Government Partnership, <http://bit.ly/17uVvVN>
 9. Ministry of Finance, "Finland's self-assessment report," Open Government Partnership, <http://bit.ly/17uVAc2>

II. Action plan development

The Finnish government used various channels to raise awareness. It organised multiple events in the capital region and also in other parts of the country to consult the public on action plan development. While the process aimed at involving members of civil society and taking into account their suggestions and views, the public consultation included only a limited number of civil society organisations.

Countries participating in OGP follow a set process for consultation during development of their OGP action plan. According to the OGP Articles of Governance, countries must:

- Make the details of their public consultation process and timeline available (online at minimum) prior to the consultation
- Consult widely with the national community, including civil society and the private sector; seek out a diverse range of views and; make a summary of the public consultation and all individual written comment submissions available online
- Undertake OGP awareness raising activities to enhance public participation in the consultation
- Consult the population with sufficient forewarning and through a variety of mechanisms—including online and through in-person meetings—to ensure the accessibility of opportunities for citizens to engage.

A fifth requirement, during consultation, is set out in the OGP Articles of Governance. This requirement is dealt with in the section “III: Consultation during implementation”:

- Countries are to identify a forum to enable regular multistakeholder consultation on OGP implementation—this can be an existing entity or a new one.

The next section deals with this, but this section and Table 1 include evidence of consultation both before and during implementation.

Table 1: Action Plan Consultation Process

Phase of Action Plan	OGP Process Requirement (Articles of Governance Section)	Did the government meet this requirement?
During Development	Were timeline and process available prior to consultation?	Yes
	Was the timeline available online?	Yes
	Was the timeline available through other channels?	Yes
	Provide any links to the timeline.	Otakantaa.fi public consultation forum: http://bit.ly/1rBDB6c
	Was there advance notice of the consultation?	Yes
	How many days of advance notice were provided?	11
	Was this notice adequate?	Yes

	Did the government carry out awareness-raising activities?	Yes
	Provide any links to awareness-raising activities.	A list of awareness-raising events at Otakantaa.fi public consultation forum: http://bit.ly/1rBDB6c Finnish Open Government Partnership Facebook group: http://on.fb.me/1ubXliB
	Were consultations held online?	Yes
	Provide any links to online consultations.	The platforms otakantaa.fi and suomijoukkoistaa.fi, the Finnish OGP Facebook group and the Ministry of Finance Twitter were used for online consultation: http://bit.ly/11OHC4M http://on.fb.me/1ubXliB http://bit.ly/1MAoKXT An overview of consultations held is found on the otakantaa.fi-service: http://bit.ly/1od20Vc
	Were in-person consultations held?	Yes
	Was a summary of comments provided?	Other, see narrative
	Provide any links to summary of comments.	A summary of the final major meeting in Helsinki in January 2013: http://bit.ly/1rBFNe2 Video of the discussions from another major event held in October 2012: http://bit.ly/1rghGBL
	Were consultations open or invitation-only?	Open
	Place the consultations on the IAP2 spectrum. ¹	Involve
During	Was there a regular forum for	Yes

Implementation	consultation during implementation?	
	Were consultations open or invitation-only?	Open
	Place the consultations on the IAP2 spectrum.	Consult

Advance notice and awareness-raising

The Ministry of Finance announced the call for civil society participation in the OGP process on October 15, 2012, through a press release,² 11 days before the first public consultation event. However, the government carried out some awareness-raising activities before this official announcement. Civil society actors established a Facebook group dedicated to the OGP process in Finland well in advance, on 29 August 2012. In addition, a workshop³ organised on 19 September 2012 during the Open Knowledge Festival in Helsinki also helped raise awareness of the OGP process.

The Ministry of Finance either organised or joined over ten different events,⁴ in consultation with the multistakeholder OGP working group, in order to promote the OGP process in Finland and to gather feedback for action plan development. While the government organised most events in the capital, Helsinki, it also organised events in other parts of the country, in Lempäälä, Rovaniemi, Porvoo, Oulu and Vaasa.

Depth and breadth of consultation

Generally, the consultation was open for participation. Otakantaa.fi public consultation platform, the OGP Finland Facebook group, and Ministry of Finance Twitter account were used to publish open invitations. In addition, some groups received invitations to participate by e-mail. These included certain civil society organisations (CSOs) that had collaborated with the government in the past, stakeholders of other government projects, and civil servants. For example, members of KANE, the Civil Society Advisory Board, which includes a number of established CSOs, were contacted. KANE aims to improve cooperation between CSOs and government officials. According to the OGP point of contact, three CSOs responded to the invitation, and the government consulted them in the resulting face-to-face meetings: Finnish Youth Cooperation—Allianssi, Multicultural Women’s Association, and The Association for Teachers of History and Social Studies in Finland.

According to interviews and participation lists, there was not a large diversity of interest represented in the OGP public consultation and related events. The private sector was not visibly represented in the consultation. According to the government’s self-assessment and stakeholder feedback, only a modest number of public servants and civil society representatives participated in the consultation. Possible reasons for the low rate of participation include stakeholders’ lack of awareness of the OGP process and its relevance and limited interest in participating in the consultation process given available time and resources. While event participation lists or details of the online consultations were no longer available during the assessment, the IRM researchers estimate, based on the government and stakeholder interviews, that 10–20 civil society organisations were to some degree actively involved in OGP action plan development. This is low since Finland is estimated to have 82,000 people working in 70,000 active registered associations and 1,000 national unions.⁵

While the Ministry of Finance was responsible for deciding which themes and commitments to include in the action plan, the action plan themes clearly reflect the interest of the civil society organisations that were most active in the OGP process. The

government and event participants chose four themes and most commitments during the consultation process. Thus, the themes were not chosen based on an analysis of open government issues, but rather based on participants' suggestions. However, during the IRM researchers' assessment of the process, civil society representatives expressed concerns that the government had poorly documented the action plan development process. CSO representatives thought several parts of the process were unclear, such as what kind of ideas stakeholders suggested, who suggested the ideas, and what happened to those ideas.

Event accessibility is generally an issue in Finland, since the country is large and sparsely populated, with the exception of the capital region. The government addressed this issue at some events by allowing stakeholders to remotely access the event through video streaming and by organising events for consultation in other areas of the country. However, the participation rates in these regional events were low, and it is unclear how the feedback received from them influenced the action plan.

There was a clear effort to provide an opportunity for consultation to as many citizens as possible, yet the effort was limited by time and availability of resources of the OGP working group and the OGP team at the Ministry of Finance. There was also an effort to reach Finns outside the capital region, even if the participation rates in the organised events were low. The public consultation generally aimed to involve participants, taking into account their suggestions and views, but the process left room for improvement in terms of reaching and involving a larger amount of civil society organisation from various fields and in terms of clearly documenting how the feedback influenced action plan formulation.

1. International Association for Public Participation, "IAP2 Spectrum of Political Participation," International Association for Public Participation, <http://bit.ly/1kMmLYC>.

2. Ministry of Finance, "Kansalaiset mukana avoimen hallinnon toimintaohjelman valmistelussa," Ministry of Finance, <http://bit.ly/ZGA6Fg>.

3. Ministry of Finance, "Avoin hallinto – Info ja talkoot," otakantaa.fi, <http://bit.ly/1xWjoxB>.

4. Ministry of Finance, "Avoin hallinto – Suomen Open Government Partnership (OGP) toimintaohjelman laatiminen," otakantaa.fi, <http://bit.ly/1rBDB6c>.

5. Aaro Harju, "Kansalaisyhteiskunnan nykyinen laajuus," Kansalaisfoorumi, <http://bit.ly/1wc8um6>.

III. Action plan implementation

The Finnish government organised various events during the implementation period to inform the public of the OGP process, including online publication of the OGP monitoring document. However, the public and civil society had limited opportunities to influence the implementation process.

As part of their participation in OGP, governments commit to identify a forum to enable regular multi-stakeholder consultation on OGP implementation—this can be an existing entity or a new one. This section summarises that information.

Regular multistakeholder consultation

The same OGP working group of civil servants and civil society organisations that was appointed to oversee action plan development also monitored action plan implementation. The working group included representatives from other ministries involved in the OGP process (the Ministry of Justice and the Ministry for Foreign Affairs), a representative from the Association of Finnish Local and Regional Authorities, representatives from non-governmental organisations (Open Ministry, Transparency Finland, Forum Virium, and joining in 2013, Open Knowledge Finland), and an academic specialised in crowdsourcing. The government published online, on the dedicated national OGP website, a monitoring document¹ that includes information about milestones, responsibilities, timetable, and status of the commitment implementation. In addition, the government used the online public consultation forum *Otakantaa.fi* to inform the public about working group meetings and consulting the public about a handful of details related to implementation.² However, the government did not publish the meeting minutes.

During implementation, the government organised several public events. The nature of the events varied greatly. For example, an event in Tampere in October 2013³ offered participants a possibility to talk with the permanent secretaries of the government's ministries. The event targeted citizens and had over 100 participants. A smaller event held in Pietarsaari in May 2013 also targeted citizens, but the audience mostly included the local media and local decision-makers. The five Paja seminars organised by the OGP team focused on different concrete topics, with some topics directly concerned with action plan commitments, such as a seminar on phrase-based writing. Additionally, the OGP team organised the civil servant network dealing with the OGP process, and it met three times. The government made material from some of the events public, but it didn't make the material consistently available or put it in a single place. Some events also included live video streaming.

For the most part, the events aimed to inform participants about the contents of the action plan and the actions taken, with little influence on the implementation of OGP's activities. With the exception of the civil servant network events, the events usually covered more topics than just OGP. For example, an event held in Turku⁴ also included the Open Data Program of the Ministry of Finance.

Citizen and CSO involvement with the OGP process was limited, as also stated in the government self-assessment. The public did not seem to be aware of OGP, which only had a low-key online presence on the Ministry of Finance's website, the *otakantaa.fi* platform, and the government's project register. Limited ministry resources were available for promoting the OGP process. CSOs that did participate struggled with continued commitment to the long OGP process, particularly because of the organisations' own limited resources. Additionally, some CSOs considered the process

limited in terms of participation and therefore demotivating. In general, open government issues concern only a small number of CSOs in Finland directly.

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1. Ministry of Finance, "Avoimen hallinnon toimintasuunitelman toimeenpanotaulukko," Ministry of Finance, <http://bit.ly/1Dvhgmi>
 2. Ministry of Finance, "Avoimen hallinnon toimintasuunitelman toimeenpano, otakantaa.fi, <http://bit.ly/1phzBli>.
 3. Ministry of Finance, "Avoin hallinto -tilaisuus Tampereella 15.10.2013," Ministry of Finance, <http://bit.ly/17hkCeU>
 4. Ministry of Finance, "Esitykset Avoimen hallinnon ja Avoimen tiedon ohjelmien yhteisestä tilaisuudesta Turussa 19.11.2013," Ministry of Finance, <http://bit.ly/1Esr9hF>

IV. Analysis of action plan contents

All OGP participating governments develop OGP country action plans that elaborate concrete commitments over an initial two-year period. Governments begin their OGP country action plans by sharing existing efforts related to their chosen grand challenge(s), including specific open government strategies and ongoing programmes. Action plans then set out governments' OGP commitments, which stretch government practice beyond its current baseline with respect to the relevant policy area. These commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate action in an entirely new area.

OGP commitments are to be structured around a set of five “grand challenges” that governments face. OGP recognises that all countries are starting from different baselines. Countries are charged with selecting the grand challenges and related concrete commitments that most relate to their unique country contexts. No action plan, standard, or specific commitments are to be forced on any country.

The five OGP grand challenges are:

1. **Improving Public Services**—measures that address the full spectrum of citizen services including health, education, criminal justice, water, electricity, telecommunications, and any other relevant service areas by fostering public service improvement or private sector innovation.
2. **Increasing Public Integrity**—measures that address corruption and public ethics, access to information, campaign finance reform, and media and civil society freedom.
3. **More Effectively Managing Public Resources**—measures that address budgets, procurement, natural resources, and foreign assistance.
4. **Creating Safer Communities**—measures that address public safety, the security sector, disaster and crisis response, and environmental threats.
5. **Increasing Corporate Accountability**—measures that address corporate responsibility on issues such as the environment, anti-corruption, consumer protection, and community engagement.

While the nature of concrete commitments under any grand challenge area should be flexible and allow for each country's unique circumstances, OGP commitments should be relevant to OGP values laid out in the OGP Articles of Governance and Open Government Declaration signed by all OGP participating countries. The IRM uses the following guidance to evaluate relevance to core open government values:

- **Access to information** — These commitments:
 - pertain to government-held information;
 - are not restricted to data but pertain to all information;
 - may cover proactive or reactive releases of information;
 - may pertain to strengthen the right to information; and,
 - must provide open access to information (it should not be privileged or internal only to government).
- **Citizen participation** — Governments seek to mobilise citizens to engage in public debate, provide input, and make contributions that lead to more responsive, innovative, and effective governance. Commitments around access to information:
 - open decision making to all interested members of the public; such forums are usually “top-down” in that they are created by government (or actors empowered by government) to inform decision making;

- often include elements of access to information to ensure meaningful input of interested members of the public into decisions;
- often include enhancing citizens' right to be heard, but do not necessarily include the right to be heeded.
- **Public accountability** — Rules, regulations, and mechanisms in place call upon government actors to justify their actions, act upon criticisms or requirements made of them, and accept responsibility for failure to perform with respect to laws or commitments. As part of open government, such commitments have an "open" element, meaning that they are not purely internal systems of accountability without a public face.
- **Technology and innovation for transparency and accountability** — Commitments for technology and innovation promote new technologies, offer opportunities for information sharing, public participation, and collaboration. Technology and innovation commitments:
 - Should make more information public in ways that enable people both to understand what their governments do and to influence decisions;
 - May commit to supporting the ability of governments and citizens to use technology for openness and accountability;
 - May support the use of technology by government employees and citizens alike;
 - May focus on the national, local and/or subnational level—wherever the government believes their open government efforts will have the greatest impact.

Recognising that achieving open government commitments often involves a multiyear process, governments should attach time frames and benchmarks to their commitments that indicate what is to be accomplished each year, whenever possible.

This section details each of the commitments the country included in its initial action plan.

While most indicators used to evaluate each commitment are self-explanatory, a number deserve further explanation.

1. **Relevance:** The IRM researcher evaluated each commitment for its relevance to OGP values and OGP grand challenges.
 - **OGP values:** To identify OGP commitments with unclear relationships to OGP values, the IRM researcher made a judgment from a close reading of the commitment's text. This judgment reveals commitments that can better articulate a clear link to fundamental issues of openness.
 - **Grand challenges:** While some commitments may be relevant to more than one grand challenge, the reviewer only marked those challenges that had been identified by government.
2. **Ambition:** The IRM researcher evaluated each commitment for how ambitious commitments were with respect to new or pre-existing activities that stretch government practice beyond an existing baseline.
 - **Potential impact:** To contribute to a broad definition of ambition, the IRM researcher judged how potentially transformative each commitment might be in the policy area. This is based on the IRM researcher's findings and experience as a public policy expert. In order to assess potential impact, the IRM researcher identifies the policy problem, establishes a baseline performance level at the outset of the action plan and assesses the degree to which the commitment, if implemented, would impact performance and tackle the policy problem.

- New or pre-existing: The IRM researcher also records whether each commitment was first published in the OGP action plan (or the specificity of the action has been improved) or if the commitment has been carried over from other public documents.
3. Timing: The IRM researcher evaluated each commitment's timing, even when clear deliverables and suggested annual milestones were not provided.
- Projected completion: In cases where this information was not available, the IRM researcher made a best judgment based on the evidence of how far the commitment could possibly be at the end of the period assessed.

General overview of the commitments

The cross-cutting theme of the Finnish action plan is citizens' participation. The commitments cover four thematic clusters: open procedures, clear language, open knowledge, and government as an enabler. The government implements the commitments in the first three categories, while those in the fourth category, government as an enabler, are implemented jointly with civil society. Many commitments are connected to existing government programmes and projects. As well, the action plan gave the same start and end dates for all commitments that corresponds to the official OGP schedule, even though some milestones included were scheduled to start in future years.

Theme 1. Open Procedures

1.1. Enhancing the openness of preparatory processes

This commitment is a starred (★) commitment.¹

In the year 1 of the Action Plan the ownership of the already existing government's project register and possibilities of its further development will be clarified. In addition, possibilities for further development of the state government's project register are studied, including its usability and possibilities to increase the awareness of its existence.

To increase transparency government decision making processes are made more traceable by publishing clear and popular process maps and annual cycles of the core preparatory and decision-making processes during the years 1 and 2 of the Action Plan.

In year 1 the principles of the consultation guidelines of legislative work will be extended to the rest of the preparatory work in the state administration. Publishing drafts and alternative solutions at the preparatory phase, using diverse consultation methods and consulting people of all ages will be emphasized when updating the guidelines.

In 2005 the Permanent State Secretaries signed common principles to enhance openness and consultation. In year 1 they will renew their commitment as their ministry's 'openness leaders' to further develop openness in their ministries and in the whole-of-government.

The marketing and implementation of the different functionalities of the e-participation environment/portal will be supported both in the state and municipal administration in year 1. Voluntary commitments will be collected from state agencies and municipalities on how they will promote openness. On their websites, the agencies will inform the public about their new actions to promote openness.

Finland will join the Open budget index programme in year 2014.

In years 1 and 2 as part of the comprehensive reform of the Local Government Act other ways of increasing the openness of preparatory processes will be studied.

Commitment Description			
A n s w e r a b i l i t y	Lead institution	Ministry of Finance	
	Supporting institutions	Municipalities, The Association of Local and Regional Authorities, Ministry of Justice, Open Ministry (CSO), Prime Minister's Office	
	Point of contact specified?	Yes	
Specificity and measurability	1. Government project register development	Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)	
	2. Decision making processes more traceable	Medium	
	3. Consultation guidelines of legislative work	Medium	
	4. "Open Government Principles for Civil Servants"	High (Commitment language provides clear, measurable, verifiable milestones for achievement of the goal.)	
	5. New citizens' participation portal	Low (Commitment language describes activity that can be construed as measurable with some interpretation on	

		the part of the reader)				
	6. Voluntary commitments on promoting openness	Medium				
	7. Joining the Open budget index programme in 2014	High				
	8. The Local Government Act reform	Medium				
R e l e v a n c e	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. Government project register development	✓				
	2. Decision making processes more traceable	✓				
	3. Consultation guidelines of legislative work		✓			
	4. "Open Government Principles for Civil Servants"	✓	✓	✓		
	5. New citizens' participation portal		✓			
	6. Voluntary commitments on promoting openness	✓		✓		
7. Joining the Open budget index programme in 2014	✓					
8. The Local Government Act reform	✓	✓				
Ambition						
Milestone	New vs. pre-existing	Potential impact				
1. Government project register development	Pre-existing	Minor: An incremental but positive step in the relevant policy area.				
2. Decision making processes more traceable	New	Minor				
3. Consultation guidelines of legislative work	Pre-existing	Minor				
4. "Open Government Principles for Civil Servants"	Pre-existing	Minor				
5. New citizens' participation	New	Minor				

portal			
6. Voluntary commitments on promoting openness	New	Moderate: A major step forward in the relevant policy area, but it remains limited in scale or scope.	
7. Joining the Open budget index programme in 2014	New	Moderate	
8. The Local Government Act reform	Pre-existing	Minor	
Level of completion			
1. Government project register development			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Substantial
2. Decision making processes more traceable			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Limited
3. Consultation guidelines of legislative work			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Not started
4. "Open Government Principles for Civil Servants"			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Complete
5. New citizens' participation portal			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Complete
6. Voluntary commitments on promoting openness			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Substantial
7. Joining the Open budget index programme in 2014			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Officially Withdrawn
8. The Local Government Act reform			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Substantial
Next steps			
1. Government project register development		No further steps required in the next action plan.	
2. Decision making processes more traceable		No further steps required in the next action plan.	
3. Consultation guidelines of legislative work		No further steps required in the next action plan.	
4. "Open Government Principles for Civil Servants"		Further steps required in next action plan.	
5. New citizens' participation portal		No further steps required in the next action plan.	
6. Voluntary commitments on promoting openness		No further steps required in the next action plan.	
7. Joining the Open budget index programme in 2014		No further steps required in the next action plan.	
8. The Local Government Act reform		No further steps required in the next action plan.	

What happened?

Government representatives consider enhancing the openness of the preparatory processes as an ongoing commitment. This includes the preparatory and decision-making processes in government and the preparatory and consultation process in law drafting. From a non-government viewpoint, the preparatory processes can often be complex, with unclear schedules and responsibilities. The interviewed government representatives, who felt it their responsibility to provide an open and accessible preparatory process, acknowledged this. The government still needs to improve transparency in these processes, but interviewed government officials felt that the OGP commitment brought greater public visibility to the issue. Some CSO representatives were concerned about procedural transparency, and there is still a need for improvement.

Two of the central goals are making preparatory processes open at the earliest stage possible and improving electronic services, such as the government's online project register HARE, which is outdated and needs to be updated to meet current standards.

In terms of outputs, the government has realised four of the milestones in accordance with the goals of the action plan. The development of the government's register project is advancing,² but it is not yet complete. The Permanent State Secretaries have signed common principles on open government,³ committing to act as their ministries' "openness leaders." The draft on the reform of the Local Government Act was open for comments until late August 2014 and will be come into force in 2015. According to the government, it aims to enhance the openness of all preparatory and decision-making processes of local government. An example this is the introduction of citizens councils.⁴ The Ministry of Justice promoted the different e-participation platforms at events related to OGP. On the municipal level, they are included in the *Kuntalaiset keskiöön* project, which aims to enhance local and regional democracy.

The government implemented two milestones differently than the way the action plan specified. It implemented the publication of process maps in a separate project.⁵ The project aims to publish the maps later in Summer 2015 since the government is currently updating the core preparatory processes and still have to approve them, which makes their visualisation difficult at this point. The government has collected and published voluntary commitments from state agencies and municipalities to promote openness on the online project register HARE,⁶ but communication to the public about these commitments has not been systematic.

Government is preparing the consultation guidelines' update, but it is behind the set action plan schedule. The Ministry of Justice's preparatory work began in Autumn 2014. The reason for this delay is the publication of the Lausuntopalvelu.fi platform for statutory consultation, which is currently in the pilot phase. The consultation guidelines need updates regarding the platform, but the government delayed implementation of this platform due to a challenging and complex procurement process.

Finland has not joined the Open Budget Index. The procedures for joining were not investigated prior to committing to this milestone, and it turned out that states are not eligible to join the Open Budget Index.

According to interviewed government representatives, the government faced implementation challenges because of the large variety of milestones and processes and the division of responsibility across multiple agencies. These factors made it difficult for responsible government representatives to follow the commitment progress as a whole, since they were not involved in the implementation of all milestones.

Did it matter?

The commitment set ambitious goals: to make legislative and government the project preparatory processes more open, so that participation is easier for civil society, and to change the mindset of civil servants, so that they understand the importance of openness. However, the milestones would have only minor or moderate impact for achieving these goals. A broader change of mindsets is hard to measure, while only two of the milestones have been fully completed. Both government and civil society interviews reveal that there is still room for improvement. For example the government representatives stressed that the government needs to develop the HARE service to current technical standards, and civil society emphasised consistent use of the service in public administration.

Moving forward

Civil society representatives underlined the importance of this topic and suggested that there is still much to do in opening preparatory processes. The IRM researchers recommend that this commitment be included in the next action plan, since the improvement of openness in participatory processes is an ongoing and important project. To improve government transparency, civil servants should be committed to this issue and civil society should be made aware of the channels offered for participatory processes. However, the IRM researchers recommend that the government amend the commitment to include more concrete milestones and a clear distribution of responsibilities. Such an amendment would help achieve more focused change rather than small impacts in many areas.

If the government completes the remaining milestones by the end of year two, the IRM researchers recommend that the next action plan focus on involving the Permanent State Secretaries in ensuring the implementation of openness initiatives on a broader scale, as they are already committed to promoting openness in their respective ministries. However, the updated commitment should include an accountability mechanism so that civil society and civil servants alike can monitor the openness principles, ensuring the government follows and implements them in all ministries.

Furthermore, the IRM researchers suggest the government continues to collect voluntary commitments from state agencies and municipalities, but communicating these commitments to the public should be more efficient and systematic to enable monitoring and debate (e.g., by publishing the commitments on a single webpage and also visibly linking the information on government and municipality websites).

1. Starred commitments are considered exemplary OGP commitments. In order to receive a star, a commitment must meet several criteria. (1) It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity. (2) Commitment language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability. (3) The commitment must have a "moderate" or "transformative" potential impact, should it be implemented. (4) Finally, the commitment must see significant progress during the action plan implementation period, receiving a ranking of "substantial" or "complete" implementation.

2. Ministry of Finance, "Valtioneuvoston hanketiedon esiselvityshanke," Hare, <http://bit.ly/1MAS9Gh>

3. Ministry of Finance, "Avoimen hallinnon yhteiset periaatteet," Ministry of Finance, <http://bit.ly/1rgoLIQ>.

4. Ministry of Finance, "Kuntalain kokonaisuudistus," Ministry of Finance, <http://bit.ly/1vK3WTh>.

5. Ministry of Finance, "Valtion ohjausjärjestelmän kehittäminen –hanke," Hare, <http://bit.ly/1vjMCJV>

6. Ministry of Finance et al., "Suomen liittymistä Open Government Partnership (OGP) -aloitteeseen valmisteleva työryhmä – Asiakirjat, Hare, <http://bit.ly/1DvJFy>

1.2: Emphasizing dialogue skills in the job descriptions of civil servants

This commitment is a starred (★) commitment.¹

The competences needed to enhance open government are specified starting from the year 1 of the Action plan. Across the public administration, the importance of dialogue skills will be highlighted in job descriptions, in recruitment criteria and in assessing personal performance in positions demanding such competences. In addition, trainings in customer oriented service design is arranged for civil servants and citizens.

Commitment Description						
Answerability	Lead institution	Ministry of Finance				
	Supporting institutions	The Association of Local and Regional Authorities				
	Point of contact specified?	Yes				
Specificity and measurability		1. Dialogue-skills of civil servants	Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)			
		2. Training in customer oriented service design	Medium			
Relevance	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. Dialogue-skills of civil servants	✓	✓			
	2. Training in customer oriented service design	✓	✓			
Ambition						
Milestone		New vs. pre-existing		Potential impact		
1. Dialogue-skills of civil servants		New		Moderate: A major step forward in the relevant policy area, but it remains limited in scale or scope.		
2. Training in customer oriented service design		New		Minor: An incremental but positive step in the relevant policy area.		
Level of completion						
1. Dialogue-skills of civil servants						
Start date: 01-07-2013			End date: 30-09-2014			
Projected completion	Substantial		Actual completion		Limited	
2. Training in customer oriented service design						
Start date: 01-07-2013			End date: 30-09-2014			
Projected completion	Substantial		Actual completion		Substantial	
Next steps						

1. Dialogue-skills of civil servants	Further steps required in next action plan.
2. Training in customer oriented service design	No further steps required in the next action plan.

What happened?

The commitment aims to change public administration recruitment and performance assessment when a job position requires strong dialogue skills. The recruitment guidance for these positions would emphasise the need for dialogue skills.

In general, interaction between civil servants and citizens has become more commonplace, one reason being the availability of online communication channels and e-mail to both parties. In Finland, society often expects civil servants to be in direct contact with citizens, other stakeholders, and also other civil servants from different agencies. Civil servants do not necessarily possess the dialogue skills for these situations.

During the first year, the Ministry of Finance organised a workshop on communication skills for government employees. According to government interviews, Human Resources (HR) experts from the Ministry of Finance conducted the workshop. These experts focused on creating measures to identify civil servants' increasing dialogue skills. On the municipal level, administrators organised training sessions for civil servants in conjunction with the *Kuntalaiset keskiöön*-project, which included perspectives on service design.² However, administrators released the planned guidance material slightly behind the specified schedule. A toolbox targeted at political actors and civil servants included 30 different methods on citizen participation.³

A key challenge for this commitment has been the distribution of responsibilities (see below). The Human Resources team from the Ministry of Finance organised the workshop, but the team was not otherwise involved in the development and implementation of the commitment, even though they have the skill-set and mandate to work on the topic.

Did it matter?

The idea behind this commitment is ambitious, since changing relevant recruitment and personal assessments is a task that affects the public sector as a whole. However, the milestones chosen for the commitment were not ambitious and could have been completed by a small group of civil servants. When IRM researchers evaluated this commitment, there was no evidence that it accomplished its aim because the recruitment criteria guidelines for assessing personnel performance have not been created or published. Therefore, the IRM researchers find this commitment only substantially complete.

Moving forward

The government should move forward with designing and implementing recruitment guidance criteria. The IRM researchers suggest it carry out training for civil servants responsible for recruitment and performance assessment so that those responsible for hiring are able to implement the guidelines. In the case of customer-oriented service design, the IRM researchers consider this an important topic, but suggest it should not be included in the same commitment as recruitment criteria, since service design is not directly related to developing the dialogue skills of individual civil servants.

1. Starred commitments are considered exemplary OGP commitments. In order to receive a star, a commitment must meet several criteria. (1) It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity. (2) Commitment language should make clear its relevance to opening government. Specifically, it must relate to at least one

of the OGP values of Access to Information, Civic Participation, or Public Accountability. (3) The commitment must have a "moderate" or "transformative" potential impact, should it be implemented. (4) Finally, the commitment must see significant progress during the action plan implementation period, receiving a ranking of "substantial" or "complete" implementation.

2. The Association of Finnish Local and Regional Authorities, "Kuntalaiset keskiöön –koulutusohjelma," The Association of Finnish Local and Regional Authorities, <http://bit.ly/1H7sHmM>.

3. The Association of Finnish Local and Regional Authorities, "Kuntalaiset keskiöön - Työkalupakki kuntalaisten osallistumiseksi palvelujen kehittämiseen ja päätöksentekoon," The Association of Finnish Local and Regional Authorities, <http://bit.ly/1BDF5G>

1.3: Strengthening proactive publishing and communication

As part of the comprehensive reform of the Local Government Act possible needs to renew the legislation regarding the information-, interaction- and consultation practices will be evaluated. The possible regulatory ways to support proactive communication will be studied during the years 1 and 2 of the Action Plan.

In the ongoing Action Programme on eServices and eDemocracy (SADe) the importance of proactive communication will be emphasized. Communication training will be organized for the project actors in years 1 and 2.

Commitment Description						
Answerability	Lead institution	Ministry of Finance				
	Supporting institutions	The Association of Local and Regional Authorities				
	Point of contact specified?	Yes				
Specificity and measurability		1. Study on municipalities' proactive communication	Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)			
		2. SADe project actors training	High (Commitment language provides clear, measurable, verifiable milestones for achievement of the goal.)			
Relevance	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. Study on municipalities' proactive communication	✓	✓			
	2. SADe project actors training	✓	✓			
Ambition						
Milestone		New vs. pre-existing	Potential impact			
1. Study on municipalities' proactive communication		Pre-existing	Minor: An incremental but positive step in the relevant policy area.			
2. SADe project actors training		Pre-existing	Minor			
Level of completion						
1. Study on municipalities' proactive communication						
Start date: 01-07-2014			End date: 30-09-2014			
Projected completion	Substantial		Actual completion	Substantial		
2. SADe project actors training						
Start date: 01-07-2014			End date: 30-09-2014			
Projected completion	Substantial		Actual completion	Substantial		
Next steps						

1. Study on municipalities' proactive communication	Further steps required in next action plan.
2. SADe project actors training	Further steps required in next action plan.

What happened?

This commitment aims to increase participation at the earliest stages of public consultation. It would enable proactive communication for projects in their earliest stages of development. Government representatives the IRM researchers interviewed said that to improve responsive communication, the government should inform civil society earlier of projects. For non-government actors, government's proactive communication could provide stakeholders with more time to prepare responses to proposals and to engage at an earlier stage.

Prior to the OGP process, government's proactive communication about projects was not a common practice, since the government usually made projects public only after they became "official." The OGP commitment did not make a significant improvement because the commitment's scope was limited. However, the government included elements of proactive communication at the local level and in municipalities in the Government Proposal of the New Local Government Act. The act's draft was up for comment until the end of August 2014 and will be ratified in 2015.

Even if the commitment did not change the status quo, the government implemented the milestones as planned. According to government interviews, the government realized its goal of organising proactive communication training for the project actors. The SADe programme, focusing on improving eServices and eDemocracy, emphasised proactive communication. Here, administrators arranged training on proactive communication for the SADe team officials. The Ministry of Finance and the Association of Finnish Local and Regional Authorities evaluated possible regulatory ways for including proactive communication in the updated Local Government Act. The draft¹ states that in order to increase participatory opportunities for citizens, municipalities should be obliged to proactively share public projects. After the implementation period covered by this progress report, the Government Proposal of the New Local Government Act was published. It includes an obligation for municipalities to proactively share public documents and projects.²

Did it matter?

The government implemented this commitment's milestones as planned, but it is likely that the milestones themselves do not have a large impact. The government provided the communication training only to a small group of civil servants, and the commitment only sought to study including elements of proactive communication in the Local Government Act. However if the government ratifies the Local Government Act, it can have a significant impact, but stakeholders can evaluate this only after the government has properly implemented the law.

Moving forward

If the government is to proactively increase its communication, the commitment should be included in the next action plan, possibly in a more ambitious way. Which further measures stakeholders can suggest on the municipal level depends on how the government includes proactive communication in the Local Government Act. Proactive communication cannot rely only on legislation. Rather, it has to be part of the organisational culture. To make proactive communication common practice, the IRM researchers suggest further measures, including more focused training for civil servants, which is necessary for changing the culture of communication.

1. Ministry of Finance, “Hallituksen esitys eduskunnalle kuntalaiksi ja eräiksi siihen liittyviksi laeiksi,” Ministry of Finance, <http://bit.ly/1CZhZbo>.

2 Ministry of Finance, “Asukkaiden vaikutusmahdollisuudet ja kunnan taloudenpito kuntalain keskiössä,” Ministry of Finance, <http://bit.ly/1CheUyF>

1.4: Promoting participatory budgeting

Starting from the year 1 of the Action Plan, information about existing national and international practices and experiments as well as experiences of participatory budgeting will be spread. A possibility to create an open, game-like application to citizens for alternative budgeting in government and municipalities will be studied. Municipalities interested in piloting participatory budgeting will be searched for. As part of the comprehensive reform of the Local Government Act, the possibility of promoting participatory budgeting by legislative measures will be evaluated. In addition, a pilot government agency, willing to put a part of the appropriation (e.g. 1 %) to be budgeted in a participatory process, will be studied.

Commitment Description						
A n s w e r a b i l i t y	Lead institution	Ministry of Finance				
	Supporting institutions	The Association of Local and Regional Authorities, Network Democracy Association				
	Point of contact specified?	Yes				
Specificity and measurability	1. Participatory budgeting information	Low (Commitment language describes activity that can be construed as measurable with some interpretation on the part of the reader.)				
	2. Game-like application on alternative budgeting	Low				
	3. Piloting participatory budgeting in municipalities	Low				
	4. Pilot government agency for participatory budgeting	Low				
	5. Participatory budgeting through legislation	Low				
R e l e v a n c e	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. Participatory budgeting information		✓			
	2. Game-like application on alternative budgeting		✓			
	3. Piloting participatory budgeting in municipalities		✓			
4. Pilot government agency for		✓				

	participatory budgeting				
	5. Participatory budgeting through legislation		✓		
Ambition					
Milestone		New vs. pre-existing	Potential impact		
1. Participatory budgeting information		New	Minor: An incremental but positive step in the relevant policy area.		
2. Game-like application on alternative budgeting		New	Minor		
3. Piloting participatory budgeting in municipalities		New	Minor		
4. Pilot government agency for participatory budgeting		New	Minor		
5. Participatory budgeting through legislation		Pre-existing	Minor		
Level of completion					
1. Participatory budgeting information					
Start date: 01-07-2013			End date: 30-09-2014		
Projected completion	Substantial	Actual completion	Limited		
2. Game-like application on alternative budgeting					
Start date: 01-07-2013			End date: 30-09-2014		
Projected completion	Substantial	Actual completion	Not started		
3. Piloting participatory budgeting in municipalities					
Start date: 01-07-2013			End date: 30-09-2014		
Projected completion	Substantial	Actual completion	Limited		
4. Pilot government agency for participatory budgeting					
Start date: 01-07-2013			End date: 30-09-2014		
Projected completion	Substantial	Actual completion	Limited		
5. Participatory budgeting through legislation					
Start date: 01-07-2013			End date: 30-09-2014		
Projected completion	Substantial	Actual completion	Substantial		
Next steps					
1. Participatory budgeting information		No further steps required in the next action plan.			
2. Game-like application on alternative budgeting		No further steps required in the next action plan.			
3. Piloting participatory budgeting in municipalities		No further steps required in the next action plan.			
4. Pilot government agency for participatory budgeting		Further steps required in next action plan.			
5. Participatory budgeting through legislation		No further steps required in the next action plan.			

What happened?

Participatory budgeting is a new tool the government uses to increase citizen participation in decision-making. Among its advantages is that participation results are visible and easily understood through the resulting budgeting decisions. Budgeting can be controversial for municipalities, and increasing transparency and citizen participation could be beneficial for both local government and citizens.

For the reform of the Local Government Act, officials evaluate legislative means of promoting participatory budgeting. The government is updating the Local Government Act, which includes an update of the legislation regarding citizen participation. Officials are including participatory budgeting as one of the new methods of citizen participation.

This commitment promotes the use of participatory budgeting through several activities, most of which focus on studying international and national practices, evaluating the utility of participatory budgeting apps, and initiating a municipal government agency pilot programme. Prior to the OGP process, the government used participatory budgeting in some pilot studies, for example, in the planning of the new central library in Helsinki in 2012, where the government budgeted 100.000€ through citizen workshops.¹ According to interviewed government representatives, some municipalities are interested in participatory budgeting, but most municipalities are unlikely to try a process not set in legislation, either because they are unwilling to or are unaware of the tool. A key challenge for any municipal legislation is the significant differences between municipalities in size, population, and budget. The OGP process did not change the situation significantly because the commitment featured mostly study-based milestones. However, the OGP commitment to promote participatory budgeting helped bring attention to the issue, according to interviewed government officials.

The draft of the Local Government Act features a paragraph on participatory budgeting.² Updating this act is a process independent of OGP, so it is likely that participatory budgeting would have been included in the act without the OGP commitment.

Most of the commitment milestones do not feature easily measurable outputs, since they focus mostly on researching participatory budgeting. The government gathered information about participatory budgeting practices prior to the OGP action plan, as groundwork for the reform of the Local Government Act.³ During the first assessment period, the government distributed this information at different events where citizen participation was a topic, but which did not have a public seminar specifically on the topic. Officials did not carry out a research study on an alternative budget app. According to government officials, two cities, Tampere and Vantaa, were identified for a pilot programme but further information on pilot development is not available. So far, the government has not found an agency for a participatory budgeting pilot. Finally, officials investigated and included options for including participatory budgeting as a legislative measure in the Local Government Act in the draft of the act.

Two milestones have produced tangible results: the municipal pilots and the inclusion of participatory budgeting in the Local Government Act.

Did it matter?

The idea behind the commitment is ambitious, since participatory budgeting is currently not widely used in public administration. The milestones themselves focused on studying and evaluating possibilities, therefore having limited impact. The milestones only specify disseminating information on the potential of participatory budgeting, rather than a commitment to use participatory budgeting. However, the inclusion of participatory budgeting into the draft of the Local Government Act reform has the potential to have an impact on citizen participation in local government. If parliament ratifies the law, municipalities will be more aware of this citizen participation method and will have the possibility to implement it more easily.

Moving forward

In its current form, the commitment is poorly measurable, since the milestones refer to studying and exploring different means to promote participatory budgeting. Participatory budgeting, however, is a valid means to enable citizen participation and

public accountability. Thus, the IRM researchers suggest that it should be included in the next action plan if the government sets clearer goals on how to implement it. Additionally, the government reports that Vantaa is piloting participatory budgeting in Spring 2015, while Tampere is in the planning phase.

The next logical step considering the reform of the Local Government Act would be educating municipalities on participatory budgeting or new participatory tools in general. According to interviewed government representatives, many municipalities are sceptical of participatory budgeting tools. Educating local government officials on the usefulness of such methods could increase their use. One option for doing so is the creation of a participatory budgeting platform for municipalities, which could ease the set-up process for participatory budgeting. However, implementing such a large-scale effort would require additional resources to be successful.

1. Virve Miettinen, "OSALLISTUVA BUDJETOINTI - KAUPUNKILAISET PÄÄTTIVÄT RAHASTA - KIRJASTO KÄYNNISTÄÄ VALITUT PILOTIT ENSI VUONNA," Keskuskirjasto, <http://bit.ly/1Aouo9d>

2. Ministry of Finance, "Hallituksen esitys eduskunnalle kuntalaiksi ja eräiksi siihen liittyviksi laeiksi," Ministry of Finance, <http://bit.ly/1CZhZbo>.

3. Ministry of Finance, "Alueellista demokratiaa - Lähidemokratian toimintamallit Suomen kunnissa, 27/2012," Ministry of Finance, <http://bit.ly/15D9qld>.

1.5: Increasing openness and customer orientation in Information and Communication Technology and e-services development

During the years 1 and 2 in the Action Programme on eServices and eDemocracy (SADe) services will be designed, tested and implemented together with the future users of these services. Joint communication to common target groups of the services developed in the programme will be supported.

Commitment Description						
Answers ability	Lead institution	Ministry of Finance				
	Supporting institutions	Agencies building online services				
	Point of contact specified?	Yes				
Specificity and measurability		Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)				
Relevance	OGP grand challenges	None specified				
	OGP Values	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
			✓			
Ambition						
New vs. pre-existing		Pre-existing				
Potential impact		Minor: An incremental but positive step in the relevant policy area.				
Level of completion						
Start date: 01-07-2014			End date: 30-09-2014			
Projected completion		Substantial	Actual completion		Substantial	
Next steps		Further steps required in next action plan.				

What happened?

The commitment for increasing openness and customer orientation and e-services development is closely related to the Action Program on eServices and eDemocracy (SADe). The SADe programme aims to improve the public sector's efficiency and quality by producing user-centric online services for citizens, businesses, and officials.¹ The commitment includes designing, testing, and implementing user services with test groups. The actions are not exclusive to the OGP commitment, but they are part of the pre-existing SADe programme. Government officials see the inclusion of this commitment in the OGP action plan as a way to create more commitment in order to increase customer awareness, according to interviewed government representatives. The commitment focuses on e-services and user testing rather than open government. Thus, its relevance to OGP values is limited to the civic participation.

The government built many of the current services according to the public administration's specifications. With this commitment, the SADe programme aims to take the perspective of service users more into account by taking a user-centric approach to designing services. Prior to the OGP process, Finland already offered many

online services. One of the recent examples of the government taking an explicitly user-centric design approach is the online service of the Finnish Tax Administration.² With this OGP commitment, the SADe programme aims to implement more customer-centric services. But, as already noted, these aims are independent of the OGP action plan, as the programme was started before Finland joined OGP.

In terms of outputs, the SADe programme produced several services³ that include future service users in its design and implementation. For example, the new online service for permits for the built environment included user testing of the services at an early stage. From the beginning, *Otakantaa.fi*, an online service for citizen participation, and *Kansalaisaloite.fi*, an online service for citizen initiatives, included a customer council and a developer community. These online portals also provide the option for citizens to participate in further development of these services.⁴ *Oma Yritys-Suomi*, a service aimed at new entrepreneurs, also included a customer council.⁵

Finding a way to motivate participants has been the key challenge to the SADe programme. The developer community participated in high numbers; however, all interested parties need an appropriate forum to participate in developing services. Additionally, service development is a longer process, which demands a commitment to participate for the entire process.

The scope of the SADe programme is also an issue—it includes seven projects across forty services. Resources are limited, and many of the services have limited target groups. Therefore, it was sometimes challenging to achieve far-reaching participation. For example, customer councils were commonly used for reaching citizens and small businesses, while educational institutions were only provided with an online tool for feedback.

Did it matter?

The commitment aimed to increase the quality of public sector online services and their user base by including interested future service users in the development of these services.

The development of the *Otakantaa.fi* and *Kansalaisaloite.fi* services included a 31-person customer council that gathered twice a year in person and operated online. It aims to include a heterogeneous group of users, taking into account participants' area, age, skills, gender, and language. The government also held several meetings with 100–200 representatives from the developer community to help develop the same services. The impact of using service-user input is visible in these services, which have a big user base. However, the SADe programme includes seven projects, with 40 services implemented from 2012–2015, and the government did not use as much user input to develop all these services.

Moving forward

The next action plan does not have to include this commitment, since the SADe programme only runs until 2015, and the government will likely complete the commitment as part of that programme. However, the goal to further include users in developing public-sector online services could be part of the next action plan, particularly if it aims to develop services relevant to open government. For more impact, the IRM researchers recommend focusing a smaller range of services on broader target groups, for example, eDemocracy services, such as *Otakantaa.fi* and *Kansalaisaloite.fi*. Focusing efforts on further user-centric development of these services is a way to increase their functionality.

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1. Ministry of Finance, "SADe-ohjelma – Toimintasuunitelma 2013," Ministry of Finance, <http://bit.ly/1yW4x9v>.
 2. Finnish Tax Administration, "Finnish Tax Administration," Finnish Tax Administration, <http://bit.ly/1LeHCZ7>
 3. SADe, "SADe-programme's map of services – Services in use," Ministry of Finance, h <http://bit.ly/1DvulvS>
 4. Ministry of Justice, "Kansalaisraati ja kehittäjäyhteisö," Ministry of Justice, <http://bit.ly/1Lc6nHY>.
 5. Ira Alanko, "Valtakunnallista kehitystyötä – missä mennään SADe-ohjelma?," Ministry of Justice, <http://bit.ly/15Dcbcy>.

1.6: Increasing the number of open and online meetings

Starting from the year 1 good practices of organizing open and online meetings as well as co-production of texts will be gathered and shared.

Commitment Description						
A n s w e r a b i l i t y	Lead institution	Ministry of Finance				
	Supporting institutions	The Association of Local and Regional Authorities				
	Point of contact specified?	Yes				
Specificity and measurability		Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)				
R e l e v a n c e	OGP grand challenges	None specified				
	OGP Values	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
			✓			
Ambition						
New vs. pre-existing		New				
Potential impact		Minor: An incremental but positive step in the relevant policy area.				
Level of completion						
Start date: 01-07-2014			End date: 30-09-2014			
Projected completion		Substantial	Actual completion		Not started	
Next steps		Further steps required in next action plan.				

What happened?

With this commitment to increase the number of open and online meetings, the government aims to provide citizens with a chance to more closely follow topics that interest them. This will likely increase citizen involvement. Since Finland has relatively low population density, it may be impractical for citizens to attend meetings in person. The commitment seeks to increase motivation for participation. From a non-government viewpoint, online meetings make following government processes easier. The commitment aims to gather and share good practices on organising open and online meetings, as well as on the co-production of texts.

Before joining OGP, some municipalities and government agencies already used online meetings. Currently, for example, in the city of Jyväskylä, municipal council meetings are filmed and broadcast online. The OGP process has made no significant change to this, as the commitment mostly aimed to provide guidance for organising online meetings. However, the government recorded many meetings, including those related to OGP, and are available on the project website.¹

So far, the government has not produced the main output (i.e., information on best practices for open and online meetings). This proved challenging because guiding material has to be adaptable to many situations. In general, open and online meetings require additional resources, depending on the scale of the meeting. At this point, the

government often has to procure technical solutions, which requires additional funds. Another challenge is finding a way to change operational culture: when providing open and online meetings, organisers could take the online audience into account during the meeting design.

Did it matter?

The commitment aimed to gather information on best practices for open and online meetings, but the government did not publish guidance material. What is more, the potential impact of the commitment is minor, because the sharing of possible best practices does not include more potentially impactful measures like the actual implementation of such practices.

Moving forward

The government should move forward with publishing best practices for open and online meetings. In the next action plan, new commitments could focus on training relevant actors so they are able to implement the practices correctly and efficiently. At this point, streaming online meetings often relies on ad-hoc solutions, and as a result, the streams and subsequent records can be challenging to find. The government could solve this by providing a platform that municipalities and agencies can use for streaming, and where the meetings are systematically archived for public use.

The IRM researchers suggest that platform development include a predefined pilot, which would create content for the platform and generate interest from other officials. It could be a specific type of meeting, for example municipal councils in several municipalities, or an agency committing to stream a series of events online. Such online meetings should focus on issues with direct relevance for the citizens. The preparatory process of legislation could be a relevant example. Officials should also make efforts to promote online meetings through social media and other channels, since these videos currently reach only small audiences. CSOs criticised this, arguing that open meetings are more than meetings that are made available online, but meetings where everyone can openly collaborate in preparations and editing.

1. Ministry of Finance, "Materiaaleja ja taustaa," Ministry of Finance, <http://bit.ly/1JrCAg4>

Theme 2. Clear Language

2.1. Drafting standard language titles of government proposals

All draft legislation will be given a concise title for communication in the preparatory phase. If possible, a plain language version will be made of the main content of the law and its core issues. Crowd-sourcing and test reading groups will be used in drafting the standard language names and resumes. The need to update instructions regarding implementation of the law being drafted is evaluated already at the beginning of the law drafting process, so that authorities can be prepared for the update work. In the year 1 of our Action Plan, we will create the guidelines for drafting the titles and resumes and start testing them in pilots. In the year 2. New guidelines will be added to the handbook on law drafting.

Commitment Description						
Answers ability	Lead institution	Ministry of Justice				
	Supporting institutions	None				
	Point of contact specified?	Yes				
Specificity and measurability		Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)				
Relevance	OGP grand challenges	None specified				
	OGP Values	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
		✓				
Ambition						
New vs. pre-existing		New				
Potential impact		Minor: An incremental but positive step in the relevant policy area.				
Level of completion						
Start date: 01-07-2013			End date: 30-09-2014			
Projected completion	Substantial	Actual completion	Limited			
Next steps	Further steps required in next action plan.					

What happened?

This commitment aims to provide titles and summaries of government proposals in standard language. Its goal is to create drafting guidelines in year 1 and then add these guidelines to the handbook on law drafting in year 2. The commitment has several objectives, such as giving all draft legislation a concise title in the preparatory phase, using test reading groups for clear language text, and evaluating the need for updating instruction regarding the preparatory process in law drafting.

From a citizen perspective, legislative texts can be challenging to understand, since the language government uses is often technical, juridical, and bureaucratic. From a government perspective, providing clear language texts is a challenging task, since drafting them requires expertise both in the subject and in the writing process itself.

Before the OGP process, the government published some texts in clear language. However, the OGP process brought increased understanding of the importance of producing clear language text.

In terms of outputs, the government hasn't created guidelines. However, it completed some pilots with plain language, such as a report on the state of democracy in Finland¹ by the Ministry of Justice and a forecasting report by the Finnish Government,² where the government provided summaries in plain language. The government also reported making efforts to use standard language in drafting legislation, although the IRM researchers could not verify examples of this. A key challenge to providing clear language texts is cost, since the process of simplifying a text while preserving the original meaning is time-intensive. Communication departments might not have the expertise to simplify text drafted by experts so that it retains its original meaning. It has also proved challenging to motivate citizens and organisations to participate in test reading groups. The government did not fully complete any of these several objectives.

Did it matter?

The idea behind the commitment is ambitious: it tackles the issue of clear language in drafting legislation, which would ostensibly improve public access to and assessment of government initiatives. The milestones, however, have limited significance. The commitment set out to provide titles and summaries of government proposals in standard language through several efforts, but only two pilots were realised. Thus, the impact can be considered small. It should, however, be noted that the understanding of the requirements concerning clear language text has improved through the process.

Moving forward

The government should include this commitment in the next action plan, since it is still necessary to make clear language writing a part of law drafts and government proposals. The current commitment included two clear parts and several less-specific actions without timetables or measurable targets. The IRM researchers suggest that if the government includes the commitment in the next action plan, the structure should be clearer and the goals more achievable. For example, at the time of action plan writing, officials should choose pilot cases with a clear relevance to citizens' lives, preferably focusing on law drafts or government proposals that have significant societal impact. The government should plan the methods used in the pilots, such as test groups, beforehand, provided officials can attain the required resources. The commitment also suffered from a lack of funding to realise its goals. For the next action plan, the government should either acquire funding for the milestones or exclude milestones that are unrealistic to realise without funding. Training on clear language writing could also be an achievable goal, in order to help improve the clear language skills of civil servants, specifically regarding law drafts and government proposals.

1. Pertti Rajala, "Avoin ja yhdenvertainen osallistuminen - Valtioneuvoston demokratiapoliittisen selonteon 2014 tiivistelmä selkosuomeksi," Ministry of Justice, <http://bit.ly/1C8kTOM>.

2. Prime Minister's Office, "Valtioneuvoston tulevaisuusselonteon pääkohtia selkosuomeksi," Prime Minister's Office, <http://bit.ly/1BqgKoQ>

2.2: Visualization of decisions

Year 1 on Action Plan we will visualize the state budget “what do I get with my tax euros?” and the budget of the programme of e-services and e-democracy (SADe). In years 2 and 3 the visualization of budgets will be further spread in public sector.

Commitment Description						
A n s w e r a b i l i t y	Lead institution	Ministry of Finance				
	Supporting institutions	None				
	Point of contact specified?	Yes				
Specificity and measurability		Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)				
R e l e v a n c e	OGP grand challenges	None specified				
	OGP Values	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
		✓	✓			
Ambition						
New vs. pre-existing		New				
Potential impact		Minor: An incremental but positive step in the relevant policy area.				
Level of completion						
Start date: 01-07-2013				End date: 30-09-2014		
Projected completion		Substantial		Actual completion		Substantial
Next steps		Further steps required in next action plan.				

What happened?

The commitment on the visualisation of decisions is connected to the clear language theme, focusing on visual communication. The main societal problem this commitment tackles is the use of appropriate, clear, and comprehensible forms of expression in public administration. The new Administrative Procedures Act¹ requires authorities to use language citizens are able to understand. Officials can use visualisation as a tool to achieve this, since visualisation can explain complex matters in simpler terms.

From a government point of view, clear language use makes more efficient communication possible. This includes both communication between government agencies and communication with external stakeholders. More specifically, visualisation is regarded as a tool that can make complex information easier and faster to understand.

The non-government point of view is very similar to the government's, but the need for clear language is higher, as, for example, citizens generally are less able to understand government communication than civil servants who have experience and training in the matter.

Before the OGP process, visualisation was not commonly used by authorities in Finland, apart from some trials. For example, the city of Jyväskylä² visualised its budget for 2013. The state budget was previously visualised by *Helsingin Sanomat*, a major Finnish

newspaper. Through OGP, the subject of clear language has gained momentum and visibility, but due to the requirements of the new Administrative Procedures Act law, it can be assumed that the subject would have gained attention even without OGP. After completing the milestones for this OGP commitment, visualisation is still not a common tool for authorities, but the government has met its goals set in the commitment.

So far, the government faced several challenges during the implementation of this commitment, with the major obstacle being a lack of visualisation skills among government officials. Stakeholders have to procure major visualisations of complex data, such as the state budget, from external service providers, but the issue here is more with smaller-scale visualisations.

As with most commitments in the Finnish action plan, completion steps are specified by action plan years. During year 1 of the action plan, the main activities for the commitment are the visualisation of the state budget and the budget of the SADe-programme of e-services and e-democracy. For years 2 and 3, the government specifies further visualisations of public sector budget as activities. The government visualised the SADe-budget³ and published it in Autumn 2013 and will update it in Autumn 2014. The government will not realise visualisation of the state budget in year 1, but the government planned this visualisation for the 2015 state budget. Officials have secured financing for this project and will procure a visualisation. Additionally, the Ministry of Finance is rewarding the best visualisation of the 2015 state budget in the Apps4Finland competition.⁴ Since 2012, the government has released the state budget in machine-readable form with the 2015 budget published in September 2014. To sum up, after year 1, the main output is the completed visualisation of the SADe budget, with the visualisation of the state budget being realised behind schedule.

Did it matter?

In terms of impact, the commitment set out to make information easier to access and faster to process, which would contribute to government efficiency and productivity. Of course, the visualisation of the SADe and state budgets is only a first step in the utilisation of visualisation, but the state budget can be considered a good case example, as the distribution of its funds is relevant to many stakeholders. More generally, the commitment aims to react to behavioral changes of young citizens in the search and use of information.

In a narrow sense, this commitment is not ambitious, since its year 1 milestone is achievable through public procurement and its year 2 and 3 milestones are not specific. However, in a broader sense that is not specified in the action plan, the commitment aims to increase the use of visualisation in government communication, which is an ambitious goal since this requires significant changes in procedures and public servants' attitudes.

At this stage, evidence for the accomplishment of both the narrow impacts specified in the action plan and the broader impacts associated with visualisation is hard to find, since the government completed only the visualisation of the SADe budget at the point of evaluation.

Moving forward

The IRM researchers suggest including this commitment in the next action plan, since the current actions are only first steps toward increasing the use of visual communication by the government. If visualisation is to become an established tool, the practices cannot only be apply to limited trials. Generally speaking civil servants lack visualisation skills. Therefore government agencies should recruit graphic designers to improve visualisation and provide training and visualisation tools for civil servants. Best

practices in visual communication have to be taken into account in order to make visualisations a valid tool. For example, visualisations must consider continuity and visual identity so users can easily switch among different services and identify providers.

¹ Finlex, “Hallintolaki”, Finlex, <http://bit.ly/17vclDY>

2. City of Jyväskylä, “Veropuu,” City of Jyväskylä, <http://bit.ly/17vcqrg>

3. SADe, “Sade-ohjelman budjetti,” Ministry of Finance, <http://bit.ly/1cwk5Rw>

4. Apps4Finland, “Apps4-Finland pääkilpailu,” Forum Virium Helsinki, <http://bit.ly/17ZFus7>

2.3: Training for civil servants in the use of clear and plain language

In year 1 of the Action Plan a working group will create a program to develop the use of clear and plain text in government documents. Defined actions will be implemented in ministries and agencies with support of professionals. Implementation may include training in years 2 and 3 of the Action Plan. A plain language check-list will be produced to support training and to be utilized by civil servants.

Commitment Description						
Answerability	Lead institution	Ministry of Education and Culture				
	Supporting institutions	Institute for Languages in Finland				
	Point of contact specified?	Yes				
Specificity and measurability		High (Commitment language provides clear, measurable, verifiable milestones for achievement of the goal)				
Relevance	OGP grand challenges	None specified				
	OGP Values	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
		✓				
Ambition						
New vs. pre-existing		New				
Potential impact		Minor: An incremental but positive step in the relevant policy area.				
Level of completion						
Start date: 01-07-2013				End date: 30-09-2014		
Projected completion		Substantial		Actual completion		Substantial
Next steps		No further steps required in the next action plan.				

What happened?

In general, the language used by civil servants can be challenging for citizens to understand. This commitment aims to organise training for civil servants in the use of clear, plain language in ministries and agencies. Additionally, it aims to create a programme to develop the use of clear and plain text in government documents and a plain language checklist for civil servants.

Before the OGP process, there were few structured efforts to improve the language used by civil servants, though KOTUS, the Institute of Languages in Finland, had highlighted the issue. After implementation of the OGP action plan, this has improved to some extent, with KOTUS reporting an increased number of requests for clear language training.

In terms of outputs, a working group has initiated an action programme on the issue,¹ which includes guidelines for better language use for civil servants.² Drafting of this action programme was already included in the Government Program 2011–2015.³ As a follow up, the government will start a campaign on civil servant language in Autumn 2014.⁴

Did it matter?

The commitment aims to train civil servants in the use of clear and plain language. The government has realised this through the initiative of individual ministries and agencies, but the OGP working group has not coordinated these activities. Administrators initiated an action programme on good civil servant language. These concrete efforts will have some, though minor, impact on improving communication between government agencies and citizens.

Moving forward

The government does not necessarily need to include this commitment in the next action plan, since the government has already written guidelines on language use, and government agencies arrange training on clear and plain language independent of the commitment. The government should include different commitments related to clear language in the next action plan, however, since all interviewed government officials agree that its inclusion as a theme in the action plan has increased the visibility of the issue, and there is clearly more work that needs to be done.

1. Kotus, "Working group appointed to prepare action plan promoting plain language in administration and legislation," Kotus, <http://bit.ly/1uTpguL>.

2. Ministry of Education and Culture, "Report of the Working Group for Clear Administrative Language (Hyvän virkakielen toimintaohjelma)," Ministry of Education and Culture, <http://bit.ly/1LeLfOt>

3. Kotus, "Hyvän virkakielen toimintaohjelma," Kotus, <http://bit.ly/1AX3WVR>

4. Nationali Institute for Health and Welfare, "Virkakielikampanja käynnistyy (Selkokeskus), Nationali Institute for Health and Welfare, <http://bit.ly/1uTpmlX>.

2.4: User testing of public administration texts

The comprehensibility of the texts, guidelines, forms etc produced by public administration will be developed by testing them together with citizens and services users. Agencies will ask for feedback and corrections through their feed-back channels on comprehensibility of the existing texts. The work will start with pilots in year 1 of Action Plan: A user panel will be formed to test the comprehensibility of the new core texts and pilot agencies and municipal-ities will be nominated.

Commitment Description						
Answerability	Lead institution	Ministry of Finance				
	Supporting institutions	None				
	Point of contact specified?	Yes				
Specificity and measurability		Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)				
Relevance	OGP grand challenges	None specified				
	OGP Values	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
		✓	✓			
Ambition						
New vs. pre-existing		New				
Potential impact		Minor: An incremental but positive step in the relevant policy area.				
Level of completion						
Start date: 01-07-2013				End date: 30-09-2014		
Projected completion		Substantial		Actual completion		Limited
Next steps		No further steps required in the next action plan.				

What happened?

This commitment aims to improve the comprehensibility of government texts through user testing. The goal is to improve communication between government and citizens by making public documents easier to understand for both civil servants and citizens.

Prior to the OGP process, large government agencies, such as KELA and Verohallinto, carried out service user testing of government texts. Smaller agencies with fewer resources did not organise user testing. To some extent, this commitment also aims to share good practices from the larger agencies to be used in the smaller agencies. However, the OGP commitment has made no significant changes in intra-agency learning.

On the government side, there are no clear outputs directly related to the commitment, as testing in agencies was done independently of this commitment. The government also has not started the pilot, since the government was unable to find a partner agency and or secure funding. The main output on the municipal level is the customer council of social services for the city of Tampere,¹ part of the *Kuntalaiset keskiöön* project, which aims to increase democracy on the municipal level. The council enables customers of

social services to participate in the development of these services, including testing of text produced by social services.

Did it matter?

The commitment set out to improve comprehensibility of the texts, guidelines, and forms produced by public administration through focus group testing and a pilot. The commitment was not very ambitious, since several agencies already test their text with service users and citizens. Furthermore, the government did not carry out the planned pilot. Thus, this commitment's impact is small. There is no clear evidence that the commitment achieved what it set out to do, save for the customer council of the social services of the city of Tampere.

Moving forward

The commitment was a small-scale testing and piloting effort that produced few tangible results due to the difficulties encountered in finding a pilot agency. Thus, the government should either exclude the commitment from the next action plan or include it only if administrators agree on concrete cases and a suitable pilot for testing. In its current shape, the commitment is not specific enough. If excluded, the government could pursue the subject of comprehensible text by public administration through other more ambitious commitments under the clear language theme.

1. SOS II-hanke, Kiinnostaako sosiaalipalveluiden kehittäminen? Tuo ideasi asiakasraatiin!, SOS-hanke, <http://bit.ly/1AX4Emc>

2.5: Standardizing and clarifying the terms and concepts used in public administration and services

This commitment is a starred (★) commitment.¹

We will define the common concepts of the public administration and the relationships between the concepts in a computer- readable way. This definition work (ontology work) is needed, because the same service or information can be searched after by using many different terms. Year 1 of the Action Plan we will create a stable operational environment and sustainable operational model to current project-based ontology work.

We will make sure that the names of administrative organizations, programs and job titles are comprehensible and transparent. Names and their abbreviations are used with consideration and the abbreviations are not used as primary names.

Commitment Description						
Answers ability	Lead institution	Ministry of Finance				
	Supporting institutions	None				
	Point of contact specified?	Yes				
Specificity and measurability		Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)				
Relevance	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. A stable operational environment and sustainable operational model for ontology work	✓				
2. Comprehensible names and abbreviations	✓					
Ambition						
Milestone			New vs. pre-existing	Potential impact		
1. A stable operational environment and sustainable operational model for ontology work			New	Moderate: A major step forward in the relevant policy area, but it remains limited in scale or scope.		
2. Comprehensible names and abbreviations			New	Minor: An incremental but positive step in the relevant policy area.		
Level of completion						
1. A stable operational environment and sustainable operational model for ontology						

work			
Start date: 01-07-2014		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Substantial
2. Comprehensible names and abbreviations			
Start date: 01-07-2014		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Substantial
Next steps			
1. A stable operational environment and sustainable operational model for ontology work		No further steps required in the next action plan.	
2. Comprehensible names and abbreviations		No further steps required in the next action plan.	

What happened?

The commitment aims to standardise and clarify the terms and concepts used in public administration production. To do this it planned to create a stable operational environment and sustainable operational model for ontology work. Additionally, the commitment aims to assure that names and abbreviations of organisations, programmes, and job titles are comprehensible and transparent.

Information produced by public administration can be hard to find and understand, since terminology in many cases is inconsistent. Using different terms for the same subject makes finding and processing information challenging, particularly by means of information technology. Ontology work defines terms and the relationship of terms. Ontologies can be understood as models where the terms used in a certain subject are put in logical relation to each other in a way that is readable by computers, and eventually more easily accessible to citizens.

Prior to the OGP process, this ontology work was part of long-term research projects at the Ministry of Finance. The commitment aims to increase the continuity of the ontology work and to expand the consistent use of terms in public administration.

A major challenge for this area is that ontology work has been project-based and the work would require greater long-term commitment due to the task's large scope. The key output of the commitment is the creation of a stable operational environment and a sustainable operational model for ontology work. So far, the government has created an ontology service with the national library coordinating the creation and implementation of several ontologies by other actors.² For example, expert groups provide field-specific ontologies, such as museums. However, it is difficult to assess whether this operational model provides the continuity required, since the government has not as yet secured long-term funding.

Another aim of the commitment was to increase the comprehensibility and transparency of names and abbreviations of government organisations, programmes, and job titles. The government included these guidelines for this in the Report of the Working Group for Clear Administrative Language.³ Such guidelines existed prior to the OGP process, but interviewed government officials felt that these were not efficient, since naming remained inconsistent. The OGP commitment led to the report's publication, which provides a framework for naming policies of different agencies.

Did it matter?

There is evidence that the commitment achieved partly what it set out to do, in the form of the ontology service and the Report of the Working Group for Clear Administrative Language. Both of these outputs have the potential to have an impact on the whole public sector by improving access to information. If the ontology service gains the

required funding, the impact of the commitment can be continuous, since the service would be running long-term.

Moving forward

The government does not have to include this commitment in the next action plan, since the government will probably complete the milestones. The ontology service is already running, but it still needs the funding necessary for continuous use. Concerning transparent and comprehensible naming in the public sector, there may be need for some follow-up, but it is not necessarily in the next action plan.

1. Starred commitments are considered exemplary OGP commitments. In order to receive a star, a commitment must meet several criteria. (1) It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity. (2) Commitment language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability. (3) The commitment must have a "moderate" or "transformative" potential impact, should it be implemented. (4) Finally, the commitment must see significant progress during the action plan implementation period, receiving a ranking of "substantial" or "complete" implementation.

2. finto, "Welcome to the Finto service!," ONKI Project, <http://finto.fi/en/>.

3. Ministry of Education and Culture, "Report of the Working Group for Clear Administrative Language (Hyvän virkakielen toimintaohjelma)," Ministry of Education and Culture, <http://bit.ly/1LeLfOt>

2.6: Increasing readability of standard texts in customer letters and decisions

Year 1 of Action Plan we will make the phrase-based writing visible by organizing a seminar focusing on the issue. We will continue developing phrase-based writing in a pilot to which different people with different skill profiles will be invited.

Year 1 of our Action Plan, the requirement of simple update of standard texts is included in the recommendations of procurement and development of Information and Communication Technology (ICT) systems.

Commitment Description						
Answers ability	Lead institution	Institute for the Languages in Finland				
	Supporting institutions	National Health Insurance Institute, Ministry of Finance, The Association of Local and Regional Authorities				
	Point of contact specified?	Yes				
Specificity and measurability	1. Phrase-based writing seminar	Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)				
	2. Phrase-based writing pilot	Medium				
	3. Simple standard text in ICT guidelines	Medium				
Relevance	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. Phrase-based writing seminar	✓				
	2. Phrase-based writing pilot	✓				
	3. Simple standard text in ICT guidelines					✓
Ambition						
	Milestone	New vs. pre-existing		Potential impact		
	1. Phrase-based writing seminar	New		Minor: An incremental but positive step in the relevant policy area.		
	2. Phrase-based writing pilot	New		Minor		
	3. Simple standard text in ICT guidelines	New		Moderate: A major step forward in the relevant policy area, but it remains limited in scale or scope		
Level of completion						
1. Phrase-based writing seminar						
Start date: 01-07-2014			End date: 30-09-2014			
Projected completion	Complete		Actual completion	Complete		
2. Phrase-based writing pilot						

Start date: 01-07-2014		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Officially Withdrawn
3. Simple standard text in ICT guidelines			
Start date: 01-07-2014		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Not started
Next steps			
1. Phrase-based writing seminar		Further steps required in next action plan.	
2. Phrase-based writing pilot		Further steps required in next action plan.	
3. Simple standard text in ICT guidelines		Further steps required in next action plan.	

What happened?

This commitment aims to enhance the readability of customer letters and decisions, especially for standard texts. The government aimed to accomplish this by organising a seminar on the issue, developing a pilot, and including an option to easily change phrase-based text in recommendations of procurement and development of Information and Communications Technology (ICT) systems.

Citizens may find government communication hard to understand due to technical and complicated phrasing. This can be the result of “phrase-based writing,” or the common inclusion of pre-written standardised text in customer letters and decisions. The public sector widely uses phrase-based writing, for example by KELA, the Social Insurance Institution of Finland. Citizens find it difficult to understand such writing, and it strains public resources, since citizens may have to demand clarification on the content from public servants. The tools that public servants have available for phrase-based writing are often outdated and unable to produce easily comprehensible text.

Prior to the OGP process, government highlighted phrase-based writing as an issue it needed to address. The interviewed government representatives claimed that the OGP action plan had produced greater awareness of the issue among public servants, researchers, developers, and IT experts.

In terms of outputs, the planned seminar took place in January 2014.¹ The event was aimed at public servants, researchers, developers, and IT experts. At the event, attendees discussed various topics, including the influence of IT systems on public servants’ text and language and the possibilities and limits of these systems for writing.

The government also used this seminar to search for a pilot municipality to develop phrase-based writing. The city of Tampere showed interest in being a pilot municipality, but it proved challenging to define the pilot’s concrete content. Another issue was that Tampere uses the same IT systems as many other cities in Finland, so making major changes to them would not have been possible due to standardisation of the systems. Another pilot possibility was the Flow IT-project of the Finnish Institute of Occupational Health, which aims to make easier IT solution procurement in the public sector. However, due to financial constraints, it was not possible to collaborate. Initially, when the government developed its action plan, it did not anticipate the amount of work a pilot requires. The government did not update the milestone of recommendations of procurement and development of ICT systems to include editable phrase-based writing.

Did it matter?

The commitment can be considered far-reaching in its scope, since it would require significant changes to public sector IT systems. Of the chosen milestones, however, only the update of the recommendations of procurement and development of ICT systems could have a moderate impact. There are budgetary and coordination challenges to accomplishing system wide changes, as the unimplemented pilot shows. Of the three

milestones, officials planned and completed only the seminar. A single event's impact is generally small, but in this case, the seminar highlighted an issue that had not been widely discussed previously. According to interviewed government officials, the government had not highlighted outdated software for phrase-based writing. The evidence from the interviews suggests that public servants, researchers, developers, and IT-experts are now more aware of this issue. An increased demand for training and consultation on the topic from KOTUS, the Institute of Languages of Finland, as stated by the interviewed KOTUS representative, indicates this.

Moving forward

The IRM researchers suggest that the government includes this commitment in the next action plan. The steps taken so far have only increased awareness of the issue and have stopped short of implementing changes to public sector IT systems. A pilot case could be a potential solution to the budgetary and coordination limitations. However, in the new action plan, the government should identify a specific pilot case and should previously secure the required resources, including finances. The pilot could focus on testing and experimenting with updated solutions to phrase-based writing, since interviewed government representatives pointed out that current systems are outdated. The government should then compile this pilot's results so that other agencies can use them. If a pilot is too difficult for the government to carry out, it could set a commitment to provide further training and seminars for good phrase-based writing.

1. Ministry of Finance, "Tietojärjestelmät ja kirjoittaminen -seminaari 14.1.2014," Ministry of Finance, <http://bit.ly/17vhNXc>

Theme 3. Open Knowledge

3.1: Opening and publishing new data and changing existing open data into a machine-readable form.

As part of Ministry of Finance's open data programme the possibility to open more documents in structured form will be studied. The Open Data program will start simultaneously with the implementation of the Action Plan. Year 1 information on public sector databases and the data sets is gathered by linking the specifications of IT- systems to one portal. Open data and open application interface requirements will be included in procurement guidelines for ICT- systems and architectural principles, in order to enable building of alternate user interfaces to IT- systems year 1 of the Action Plan. When purchasing analytical tools and re-search the possibility to publish tools, methods and data will be taken into account.

Starting from year 1 of the Action Plan data reserves that are central to openness of government will be opened. The project portfolio of State administration ICT projects and Government program follow-up data will be published online. The possibility to open legislation in machine-readable form is studied. In Years 2 and 3 more data will be opened.

Commitment Description						
Availability	Lead institution	Ministry of Finance				
	Supporting institutions	None				
	Point of contact specified?	Yes				
Specificity and measurability	1. Possibilities to open more documents	Low (Commitment language describes activity that can be construed as measurable with some interpretation on the part of the reader)				
	2. Data reserves and data sets in one portal	High (Commitment language provides clear, measurable, verifiable milestones for achievement of the goal)				
	3. Openness in ICT principles	Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)				
	4. Analytical tools and research publishing	Low				
	5. Open data central to openness of government	High				
Relevance	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. Possibilities to open more documents	✓				

	2. Data reserves and data sets in one portal	✓			✓	
	3. Openness in ICT principles	✓			✓	
	4. Analytical tools and research publishing	✓			✓	
	5. Open data central to openness of government	✓		✓		

Ambition

Milestone	New vs. pre-existing	Potential impact
1. Possibilities to open more documents	Pre-existing	Minor: An incremental but positive step in the relevant policy area.
2. Data reserves and data sets in one portal	New	Minor
3. Openness in ICT principles	New	Minor
4. Analytical tools and research publishing	New	Minor
5. Open data central to openness of government	New	Moderate: A major step forward in the relevant policy area, but it remains limited in scale or scope.

Level of completion

1. Possibilities to open more documents

Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Not started

2. Data reserves and data sets in one portal

Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Substantial

3. Openness in ICT principles

Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Limited

4. Analytical tools and research publishing

Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Limited

5. Open data central to openness of government

Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Limited

Next steps

1. Possibilities to open more documents	Further steps required in the next action plan.
2. Data reserves and data sets in one portal	No further steps required in the next action plan.
3. Openness in ICT principles	No further steps required in the next action plan.
4. Analytical tools and research publishing	No further steps required in the next action plan.
5. Open data central to openness of government	Further steps required in the next action plan.

What happened?

This commitment aims to increase the ease of access to public administration decisions and data information. It also aims to explore options for opening documents in a structured form and open data reserves that are central to government openness.

In Finland, the government often publishes documents in a form that is not machine-readable (scans of documents, for example) so that searching for a particular topic or reusing the information can be challenging for both citizens and public administration. Data the government opened to the public were also difficult to find without a portal. The commitment, which is part of the Ministry of Finance's open data programme, aims to make a considerable improvement by opening up data through IT systems and by making data accessible through one portal. The commitment also aims to open few central data sets, which, however, are only a small part of all government data sets.

In terms of outputs, the government did not properly study the options for opening more documents in a structured form. As a result, with the resources available, the effort has proven to be a too ambitious. Since the government automatically produces data on documents in systems used by the public administration, this task would require a significant update of those systems.

For the first year of the action plan, the government gathered information on public sector databases and the data sets by linking the specifications of IT-systems to one portal. This *Yhteentoimivuu.fi* portal existed prior to OGP,¹ and the government is currently updating it. The government is also including it into the open data service,² which was opened in September 2014.³ Interviewed government officials feel that administrators have not found an appropriate way to gather information to one place, since not all target groups used the *Yhteentoimivuu.fi* portal.

The government has drafted the process for including open data and open application interface requirements in procurement guidelines for IT systems and architectural principles, and it was up for public commentary prior to publication (until August 2014).⁴

This commitment's final milestone aims to open data reserves central to government's openness. Finlex⁵ is a database of Finnish legislation, which previously had not included structural data, but it has now been released. Due to technical issues, it was challenging to publish the project portfolio of state administration ICT projects and government programme follow-up data. Another issue with the project portfolio is that some data is classified and cannot be opened to the public. However, the rest is public according to the Act on the Openness of Government Activities, so possibly resulting classification issues have to be tackled.⁶ The government did not open either the portfolio or the follow-up data during the period of implementation analyzed by this report. However, the government opened the follow-up data during the Open Finland Conference in September 2014, after the planned schedule for this milestone.

Did it matter?

The commitment set out to increase the ease of access to information on public administration decisions and data. At this point, its impact is hard to measure as the commitment is a collection of different types of efforts. Considering the amount of public administration data that the government needs to open, the steps this commitment takes are small.

Moving forward

The commitment set concrete, clear milestones that the government realised in some cases but not in others. The commitment is more technically focused on back-end

technical solutions compared to other commitments. While these solutions' results are relevant to both citizens and public administration, the process of designing and implementing them is less so. For the most part, the government already pursued these milestones in other projects within the Ministry of Finance's open data programme. However, a continuous commitment by government to open data would be relevant for the next action plan. For this reason, the IRM researchers suggest including in the next action plan a similar commitment that brings together all the different efforts for opening public data to increase the accountability and impact of these efforts. The OGP work group should collaborate with non-governmental stakeholders to prioritise which data sets they should open to the public first, which requires further research on relevant data sources.

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1. Yhteentoimivuuden tietopankki, "Yhteentoimivuus.fi," Ministry of Finance, <http://bit.ly/17ZQCVS>
 2. Yhteentoimivuuden tietopankki, "Yhteentoimivuus.fi-portaalin aineistoja mukana uudessa Avoindata.fi-portaalissa," Ministry of Finance, <http://bit.ly/15Mdyqg>.
 3. Avoindata.fi, "Avoindata.fi", Government ICT Centre Valtori, <http://bit.ly/1vKn2Zl>
 4. JUHTA, "JHS 166 Julkisen hallinnon IT-hankintojen yleiset sopimusehdot - Liite 8. Erityisehtoja tilaajan sovellushankinnoista avoimen lähdekoodin ehdoin," JUHTA, <http://bit.ly/1jvgqP>.
 5. Finlex, "Finlex Data Bank," Finlex, <http://bit.ly/17hvppo>
- ⁶ Finlex, "Laki viranomaisten toiminnan julkisuudesta," Finlex, <http://www.finlex.fi/fi/laki/ajantasa/1999/19990621>

3.2: Clear terms of use of open data and knowledge

This commitment is a starred (★) commitment.¹

In year 1 of the Action Plan we will produce a public sector recommendation of terms of use of open data based on international practices.

Commitment Description						
Answerability	Lead institution	Ministry of Finance				
	Supporting institutions	None				
	Point of contact specified?	Yes				
Specificity and measurability		High (Commitment language provides clear, measurable, verifiable milestones for achievement of the goal)				
Relevance	OGP grand challenges	None specified				
	OGP Values	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
		✓				
Ambition						
New vs. pre-existing		New				
Potential impact		Moderate: A major step forward in the relevant policy area, but it remains limited in scale or scope.				
Level of completion						
Start date: 01-07-2013				End date: 30-09-2014		
Projected completion		Complete		Actual completion		Substantial
Next steps		No further steps required in the next action plan.				

What happened?

This commitment aims to provide clear terms of use for open data and open knowledge by producing recommendations for the public sector based on international best practices. It also aims to standardise practices for licensing public sector open data. As a result, the use of open data and open knowledge should become easier for non-government groups.

The main output of this commitment will be a Public Administration Recommendation. While the government planned to finish in year 1, the work did not advance as quickly as anticipated. The government drafted the recommendation and set it up for comments, with the final step being the Finnish translation of the Creative Commons 4.0 license, on which the recommendation is based.² This proved challenging since the translation has to be in accordance with the Finnish law.

Did it matter?

The government drafted the recommendation but has not finalised it yet. However, prior to the OGP process, no common standards were available for the public sector. Once the recommendation is complete, there will be a common standard based on a Creative Commons license. Public Administration Recommendations are not binding, but the public sector generally strives to adhere to them. Thus, it is likely that the

commitment will have the intended impact once the government finalises the recommendation. The commitment can be considered moderately ambitious, as drafting a recommendation is not a task that requires a major effort, but if the government manages to implement a standard practice of licensing, it could have a moderate impact.

Moving forward

As the government drafted the recommendation and will be ratified by JUHTA, the Advisory Committee on Information Management in Public Administration, by the end of 2014, no further action is required in the next action plan.

1. Starred commitments are considered exemplary OGP commitments. In order to receive a star, a commitment must meet several criteria. (1) It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity. (2) Commitment language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability. (3) The commitment must have a "moderate" or "transformative" potential impact, should it be implemented. (4) Finally, the commitment must see significant progress during the action plan implementation period, receiving a ranking of "substantial" or "complete" implementation.

2. JHS-suositukset, "JHS 189 Avoimen tietoaaineiston käyttö lupa," JUHTA, <http://bit.ly/1yJAQrE>.

3.3 Strengthening the citizen’s right to personal information

A citizen should have the possibility to check to which registers information about him/her has been recorded. Different options to realize this will be studied in year 1 of the Action Plan. In years 2 and 3 of the Action plan a viewing function for citizen’s own personal data and her right to re-use of personal data will be built to core registers of authorities. In year 1 of the Action Plan we will look into the training needs for open knowledge and organize a seminar jointly with the open data community, experts of access to information legislation and the office of the data ombudsman. In year 1 we will create a stable operational environment to produce open data support services and tools: systematic training for finding, processing, harmonizing, publishing and utilizing open data.

Commitment Description						
A n s w e r a b i l i t y	Lead institution	Ministry of Finance				
	Supporting institutions	Open Knowledge Finland				
	Point of contact specified?	Yes				
Specificity and measurability	1. Studying options for checking personal information	Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)				
	2. Viewing function and re-use of personal data	High (Commitment language provides clear, measurable, verifiable milestones for achievement of the goal)				
	3. A seminar on combining open data and data privacy	Medium				
	4. Operational environment for open data support	Medium				
R e l e v a n c e	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. Studying options for checking personal information	✓			✓	
	2. Viewing function and re-use of personal data	✓		✓	✓	
	3. A seminar on combining open data and data privacy	✓				
	4. Operational environment for open data support	✓				

Ambition			
Milestone	New vs. pre-existing		Potential impact
1. Studying options for checking personal information	New		Minor: An incremental but positive step in the relevant policy area.
2. Viewing function and re-use of personal data	New		Transformative: A reform that could potentially transform "business as usual" in the relevant policy area.
3. A seminar on combining open data and data privacy	New		Minor
4. Operational environment for open data support	New		Moderate: A major step forward in the relevant policy area, but it remains limited in scale or scope.
Level of completion			
1. Studying options for checking personal information			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Limited
2. Viewing function and re-use of personal data			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Limited
3. A seminar on combining open data and data privacy			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Not started
4. Operational environment for open data support			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Limited
Next steps			
1. Possibility to check on own personal information		Further steps required in next action plan.	
2. Viewing function for personal data		Further steps required in next action plan.	
3. A seminar on combining open data and data privacy		Further steps required in next action plan.	
4. Operational environment for open data support		Further steps required in next action plan.	

What happened?

This commitment has several different types of goals in it.

- First, the commitment aims to strengthen citizens' skills needed for combining privacy and open data. It does this by studying citizens' training needs and organising a seminar.
- Second, the commitment aims to strengthen citizens' rights to own their personal information by researching options on how citizens can find out what information is recorded about them. The government may be able to help with this by including this functionality into core registers of public authorities and even allowing the re-use of personal data by citizens.
- Third, the commitment aims to create a stable operational environment to produce open data support services and tools by means of systematic training. The third goal is a bit more vague, and interviewed government representatives specify that it relates to the activities of the Open Knowledge Program carried out independently of OGP by the Ministry of Finance.

The first two goals touch on the issues of online privacy and “my data,” which relates to the ability of citizens to re-use the data that is gathered about them by public authorities and private corporations alike. From the government perspective, data stored by government are owned by government. From the citizens' perspective, those data are owned by the citizen to whom the data is related. On the issue of data ownership, there is potential for conflict of interests between government and citizens. The Ministry of Transport and Communications recently published a study Open Knowledge Finland recently wrote on this topic.¹ The study aimed to present a compromise between these two perspectives.

In terms of outputs, the Ministry of Finance plans to complete the Service Architecture project that would evaluate options for how citizens can check their own records. The government will release a beta version of a citizens' data portal in Autumn 2015 and will to some extent include the option to check registry data.² However, the government will not complete integrating an information viewing function or the data re-use functionalities into the core registers of authorities on schedule, since this proved to be too challenging due to inefficient implementation and an overly optimistic original schedule. So far, neither the Ministry of Finance, the open data community, nor other organisations have organized a systematic training for finding, processing, harmonising, publishing, and utilising open data in relation to this commitment. The government includes open data support services and tools in other projects, for example the previously mentioned data portal.

Did it matter?

Before the OGP process, the personal data law³ allowed citizens to inquire about what information public authorities had on them. However, in practice it may be a challenge for citizens to get this information, and there are few possibilities for citizens to re-use the data. This OGP commitment made a few small steps toward easing access to personal data, but the situation has not changed significantly.

This commitment aimed to strengthen citizens' skills needed to combine privacy and open data, provide citizens with the possibility to check and re-use their data stored by public authorities, and organise systematic training on open data. It aimed to fundamentally change how citizens access their own data. The data re-use functionality would even be transformative, as data re-use allows citizens to gain control of their own data and use it in other services. This kind of re-use possibility is rare globally and would to a certain degree change the perception of who has ownership rights to the data government gathered about its citizens. At this point, however, the impact of the commitment has been small due to limited implementation. The Service Architecture project will research options for checking citizens' own records, with the beta version of the data portal schedule to be released in Autumn 2015.

Moving forward

The commitment requires further action in the next action plan, since it did not achieve its objectives. The public administration should continue working on the issue of privacy and accessibility of data. Because the commitment is behind schedule, the same milestones could be used in the next action plan in a way that accounts for the progress made up to that point. The collection and use of data is a fundamental issue for both government and citizens and should not be left out of the next action plan, since it closely relates to OGP values, such as public accountability and access to information.

1. Antti Poikola, Kai Kuikkaniemi and Ossi Kuittinen, “My Data – johdatus ihmiskeskeiseen henkilötiedon hyödyntämiseen,” Ministry of Transport and Communications, <http://bit.ly/15DhHw7>.

2. Ministry of Finance, “Kansallinen palveluarkkitehtuuri (KaPA),” Ministry of Finance, <http://bit.ly/15DGgJa>.

3. Finlex, “22.4.1999/523 – Henkilötietolaki,” Finlex, <http://bit.ly/1LhxiBv>

Theme 4. Government as an Enabler

4.1: Removing barriers of action for civil society

A campaign of "inform about barriers" will be started in year 1 of the Action Plan. In this campaign one can report about barriers, obstacles or hindrances in public administration. This will help to prioritize open citizen debate and fixing issues that are in the way of developing services for instance by updating legislation, guidelines or web services. Also in year 1 of the Action Plan consultation guidelines are updated so, that engaging citizens in consultation process always includes a commitment to process the results. The Open Knowledge Forum Finland will actively monitor and report of the creation of applications using open data and their implementation.

Commitment Description						
Answerability	Lead institution	Ministry of Finance				
	Supporting institutions	Association for Local and Regional Authorities, Open Ministry (CSO), Ministry of Justice, Network Democracy Association				
	Point of contact specified?	Yes				
Specificity and measurability	1. "Inform about barriers" campaign	High (Commitment language provides clear, measurable, verifiable milestones for achievement of the goal)				
	2. Updating consultation guidelines	Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)				
	3. Monitoring and reporting on open data apps	Low (Commitment language describes activity that can be construed as measurable with some interpretation on the part of the reader)				
Relevance	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. "Inform about barriers" campaign		✓			
	2. Updating consultation guidelines		✓	✓		
3. Monitoring and reporting on open data apps	✓			✓		
Ambition						
Milestone		New vs. pre-existing		Potential impact		
1. "Inform about barriers" campaign		New		Moderate: A major step forward in the relevant policy area, but it remains limited in scale or scope.		
2. Updating consultation guidelines		New		Moderate		

3. Monitoring and reporting on open data apps	New	Minor: An incremental but positive step in the relevant policy area.	
Level of completion			
1. "Inform about barriers" campaign			
Start date: 15-10-2013		End date: 31-05-2014	
Projected completion	Substantial	Actual completion	Officially Withdrawn
2. Updating consultation guidelines			
Start date: 15-10-2013		End date: 31-05-2014	
Projected completion	Complete	Actual completion	Substantial
3. Monitoring and reporting on open data apps			
Start date: 15-10-2013		End date: 31-05-2014	
Projected completion	Substantial	Actual completion	Not started
Next steps			
1. "Inform about barriers" campaign		Further steps required in next action plan.	
2. Updating consultation guidelines		Further steps required in next action plan.	
3. Monitoring and reporting on open data apps		No further steps required in the next action plan.	

What happened?

During the consultation phase when the OGP work group developed the action plan, the civil society representatives and government representatives agreed that one out of the four themes would focus on enabling civil society, since the other three focus on improving government and municipalities' openness. This commitment's milestone to tear down barriers of action for civil society through a campaign where citizens could report on the obstacles they encounter in public administration is the outcome of the civil society representatives' request.

Two additional milestones (two and three) have a different approach to reaching this goal. The government is to update the public consultation guidelines for law drafting so there is a commitment to process the results. The problem is it is not clear when and how the government uses consultation results in law drafting.¹ In addition, representatives of the open knowledge community committed to reporting on the creation of open data applications.

Government officials completed the "inform about barriers" campaign on a small-scale with fairly limited success, so they ended it early. The interviewed government officials stated that it proved challenging to create concrete milestones where government could act as an enabler for civil society action. Government and civil society had trouble finding common ground. Civil society actors wanted stronger wording for the campaign, focusing on mistakes and bad practices in public administration, while government representatives argued for a more positive approach. Government officials and civil society created a compromise by focusing on barriers to openness. However, there was no clear definition of what constitutes a "barrier to openness," so some of the feedback received focused on unrelated issues. Additionally, the campaign did not have a budget, so it was impossible to create a website for informing about barriers and for marketing the campaign. This also meant there was no clear communication channel. Civil society reported only seven barriers in events and by e-mail, which administrators then forwarded to agencies. Few of the forwarded messages received answers from the agencies.

The Ministry of Justice updated its consultation guidelines to include a commitment to process results of citizen consultations, though it has not yet published these guidelines. Their implementation will be followed in a research working group of the ministry.

Open Knowledge Finland, which closely follows open data app development, has had little communication with government officials, and so it has not reported developments to them, according to interviews.

Did it matter?

Prior to the OGP process, civil society did not see the government as an enabler for civil society action. The OGP action plan is unlikely to change this perception, as the planned milestones were unrelated to the main goal and were, to a great extent, not realised.

The commitment could have been ambitious, but the government realised the milestones only on a small-scale that had limited impact. With the exception of the updated consultation guidelines, the commitment would do little to decrease government barriers. An indication of this is the campaign that generated only a handful of responses and demonstrated that the government did not meet the expectations of civil society representatives, who wished for more visibility, accountability, and focus on improving bad practices.

Moving forward

The IRM researchers suggest that the government should include tearing down barriers of action for the civil society as such in the next action plan, since this in itself is an ambitious goal. If the government implements it correctly, it could have a major impact on society. Government officials could include the campaign “inform about barriers” in the next action plan, but they should fix several issues for it to deliver more impact. For one, this campaign needs a marketing campaign and a designated site where citizens can inform the government about barriers. Then, processing information needs to be more efficient: instead of forwarding citizens’ reports to different agencies, there needs to be a clear distribution of responsibilities on who distributes the messages and who in an agency responds to them. Preferably, the barriers mentioned should be visible to everyone and publicly monitored for increased accountability. All these issues require a designated budget and clear performance goals. Another option would be a small-scale approach that focuses on barriers for openness in only one agency or ministry, since this would make the distribution of responsibilities simpler. If there are no resources available, government officials should not include the commitment.

The Ministry of Justice leads the consultation guideline update, but its implementation in other ministries should be actively followed and monitored by the ministry and CSOs. Government actors and the open knowledge community on applications using open data could improve their communication. However, including civil society actors in the implementation of the action plan has been challenging since the goals were unclear. Therefore, the milestone should not be included in the next action plan.

1. Ministry of Justice, “Tilastoja ja selvityksiä lainvalmistelusta,” Ministry of Justice, <http://bit.ly/15Fjf8S>.

4.2: Proactive presence and accessibility of civil servants

We will create a voluntary openness agent's role in the Year 1 of the Action Plan and spread the concept to all agencies. The civil servants can register voluntarily to become openness agents. All agencies will be informed of openness and leaders and managers will be asked to commit to being openness leaders. Openness agents and leaders are available to citizens and keep contact with each other to promote openness in public administration.

Starting in the Year 2, a yearly prize is given out to a representative from each level of the public administration, possibly in connection with democracy prize. The basis for the reward is that the person has enabled civic society action in his/her own work. The reward is given yearly to one representative from municipal, one from regional, and one from state central administration. Civic organizations will offer training to civil servants in engaging citizens in consultation process. Civil servants are encouraged to participate in this training.

Commitment Description						
A n s w e r a b i l i t y	Lead institution	Ministry of Finance				
	Supporting institutions	Association for Local and Regional Authorities, Ministry of Justice, Open Ministry (CSO), Open Knowledge Finland				
	Point of contact specified?	Yes				
Specificity and measurability		1. Create an openness agent's role and enroll agents	High (Commitment language provides clear, measurable, verifiable milestones for achievement of the goal)			
		2. Award a civil servant enabling civil society action	High			
		3. Education about citizen engagement in consultation	Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)			
R e l e v a n c e	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. Create an openness agent's role and enroll agents			✓		
	2. Award a civil servant enabling civil society action		✓			
3. Education about citizen engagement in consultation		✓	✓			

Ambition			
Milestone	New vs. pre-existing		Potential impact
1. Create an openness agent's role and enroll agents	New		Minor: An incremental but positive step in the relevant policy area.
2. Award a civil servant enabling civil society action	New		Minor
3. Education about citizen engagement in consultation	New		Minor
Level of completion			
1. Create an openness agent's role and enroll agents			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Complete	Actual completion	Complete
2. Award a civil servant enabling civil society action			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Not started	Actual completion	Complete
3. Education about citizen engagement in consultation			
Start date: 01-07-2013		End date: 30-09-2014	
Projected completion	Substantial	Actual completion	Not started
Next steps			
1. Create an openness agent's role and enrol agents		Further steps required in the next action plan.	
2. Award a civil servant enabling civil society action		No further steps required in the next action plan.	
3. Education about citizen engagement in consultation		No further steps required in the next action plan.	

What happened?

The commitment to the proactive presence and accessibility of civil servants aims to promote openness in public administration. CSOs can find it challenging to respond to calls about consulting on legislative drafts, and citizens can feel that the government only informs them of public administration projects at a late stage. CSO stakeholders expressed this concern to IRM researchers in interviews. The proactive presence of civil servants can provide CSOs and citizens with better opportunities to participate.

This commitment includes three milestones. For year 1, the government gives civil servants in all agencies the possibility to voluntarily enlist as their agencies' openness agents, whose tasks will be available to citizens. They are expected to keep contact with other openness agents. For year 2, the government will award an annual prize to civil servants who enable civil society action through their work. Additionally, civic organisations will provide training for citizen engagement in consultation processes to civil servants.

The government did not implement the openness-agents milestone in the way specified in the action plan. Government officials responsible for the commitment made this decision. Government officials asked all government agencies to appoint a responsible civil servant, contrary to the original plan where the role of an openness agent was voluntary. Interviewed government officials saw this as a more effective way to bring open government principles into agencies, since representing their agencies is an official part of representatives' tasks, for which time is allocated. Instead, the government formed a network for developing open government, with a representative from each government agency. So far, officials arranged three meetings in October 2013, February 2014, and May 2014.¹ Officials encourage members to share results in their respective agencies. Also, the government is implementing a similar network for municipal actors.

Officials awarded the prize for year 2 for the first time in 2013 during Democracy Day, which was organised by the Ministry of Justice, the Ministry of Finance, and the Association of Finnish Local and Regional Authorities. Officials also set the award criteria then. CSOs have organised some trainings for civil servants in addition to the Open Knowledge Roadshow 2013. More specifically, in Spring 2014, Open Knowledge Finland arranged a “master course for open government data,”² but its focus does not match the commitment’s focus. Interviewed government representatives were unaware of any other effort.

Did it matter?

Prior to the OGP process, civil servants’ contact information was publicly available. After OGP action plan implementation, the situation is largely unchanged, as the efforts were small-scale. However, two outputs, namely openness leaders and prize for civil servants, did not exist prior to OGP and are direct results of the commitment.

The openness leaders will likely have an impact on their respective agencies, since their agencies include them in activities, and openness leaders generally strive to communicate open government values and the existence of OGP to their colleagues. The prize for civil servants has a certain visibility, at least for the target group of civil servants, and as such will potentially motivate civil servants to make an effort to enable civil society action. As the amount of training organised by CSOs was small, the potential impact was small. Evidence for any changes in attitude or operational culture in public administration is hard to find, and of course, also unlikely to occur after one year, but the networks of openness leaders are a promising development.

Moving forward

As the efforts so far have been promising but still small-scale, the IRM researchers suggest further action in the next action plan to achieve additional impact. The government has largely reached the milestones specified in the first action plan, so development of those actions appears a feasible option. The yearly prize is already set to continue, and while successful in encouraging openness among civil servants, officials do not necessarily have to include it in the action plan. Government agencies and municipalities should continue to appoint open government representatives, because these networks of representatives may potentially have a larger impact, in the context of the planning and implementation of the OGP process in Finland. For the next action plan, officials should clearly define their roles, tasks, and responsibilities so that there is a commitment to achieve an impact in and by the respective agencies. Since CSOs did not organise many trainings, an alternative approach seems necessary. Instead of relying on CSOs to provide training, government agencies and municipalities could aim to provide a platform in which CSOs could provide such training. For example, by organising training events where CSOs are invited as trainers.

1. Ministry of Finance, “Virkamiesverkosto,” Ministry of Finance, <http://bit.ly/17vtr14>

2. Open Knowledge Finland ry, “Avoim julkishallinnon data – mestarikurssi,” Open Knowledge Finland ry, <http://bit.ly/1zqveiW>

4.3: Providing web tools and training to civil society organizations

The needs for web tools and training of the civic society and organizations will be mapped out in the Year 1 of the Action Plan. Organisations and representatives of civic society will be offered training as well as web tools and training linked to those through, for example, the e-participation portal/environment of the Ministry of Justice.

Commitment Description						
Answerability	Lead institution	Ministry of Justice				
	Supporting institutions	Open Knowledge Finland				
	Point of contact specified?	Yes				
Specificity and measurability		1. Mapping web tools and training	Low (Commitment language describes activity that can be construed as measurable with some interpretation on the part of the reader)			
		2. Arranging training on use of web tools	Medium (Commitment language describes an activity that is objectively verifiable, but it does not contain specific milestones or deliverables.)			
Relevance	OGP grand challenges	None specified				
	OGP Values					
	Milestone	Access to Information	Civic Participation	Public Accountability	Tech & Innovation for Trans. & Acc.	Unclear
	1. Mapping web tools and training		✓			
	2. Arranging training on use of web tools		✓			
Ambition						
Milestone			New vs. pre-existing	Potential impact		
1. Mapping web tools and training			New	Minor: An incremental but positive step in the relevant policy area.		
2. Arranging training on use of web tools			Pre-existing	Minor		
Level of completion						
1. Mapping web tools and training						
Start date: 01-07-2013			End date: 30-09-2014			
Projected completion	Complete	Actual completion		Complete		
2. Arranging training on use of web tools						
Start date: 01-07-2013			End date: 30-09-2014			
Projected completion	Substantial	Actual completion		Complete		
Next steps						
1. Mapping web tools and training			No further steps required in the next action plan.			
2. Arranging training on use of web tools			No further steps required in the next action plan.			

What happened?

The Ministry of Justice is running a project on several participatory platforms,¹ such as *otakantaa.fi*, for the open preparation of legislation and other public consultation; *kansalaisaloite.fi* and *kuntalaisaloite.fi*, for citizens' initiatives; and *lausuntopalvelu.fi* for statutory consultation. This commitment aims to provide tools and training to civil society organisations that use these services. In year 1, officials planned to map requirements for this and to offer appropriate training and web tools.

The participatory platforms are tools for both citizens and organisations to engage with public administration. Since most of these platforms are meant to be interactive, both government and private users must participate. The key challenge here is creating an understanding among stakeholders about how they can utilise participatory platforms. In general, stakeholders aim to make participation more open and to create easier access for citizens and CSOs. In terms of outputs, the Advisory Council for Civil Society Politics of the Ministry of Justice has discussed types of training. Officials arranged a workshop on the topic during the first year of implementation. They reached the conclusion that organisations do not require additional training on the participatory tools, but that officials instead need to develop procedures for using what these tools offer. The Ministry of Justice organised a variety of trainings for civil servants, organisations, and citizens, focusing on participatory methods, how to make use of them, and how to use the online participatory tools. It organised more than 100 sessions by project on participatory platforms between early 2012 and summer 2014, some focusing on presenting the platforms. About 20 sessions focused directly on training.²

Did it matter?

Prior to the OGP process, the government started developing participatory platforms. After OGP action plan implementation, stakeholders are using most platforms. CSOs would have arranged training independently of the OGP process, though OGP participation created channels for closer cooperation and coordination between ministries working on the same topic. The platform for citizens' initiatives, for example, was particularly successful in increasing government and CSO interface.

The commitment is closely related to the project on participatory platforms, and officials did not set a goal for how many trainings to organise. Given the amount of training and presentations of the tools, it is possible that there was some impact on the use of the platforms because they were introduced to a larger audience.

Moving forward

The government completed commitment milestones as planned. For this reason, IRM researchers do not suggest further action on this commitment for the next action plan. The Ministry of Justice dedicated resources for training that stakeholders will utilise in the future, regardless of the inclusion of this commitment in the next action plan. Introducing the participatory platforms to a greater audience is a continuous project that should not be halted in future, but further action in the next action plan should be more ambitious and have a clearer focus on specific issues related to web tools.

1. Ministry of Justice, "Osallistumisympäristö-hanke," Ministry of Justice, <http://bit.ly/1BjHwdg>.

2. This is based on a list of on events related to the participatory platforms by the Ministry of Finance. Researchers were able to review the unpublished list.

V. Process: Self-Assessment

The government provided a detailed self-assessment report in due time, but it lacked information on the implementation of commitments and milestones.

V.1: Self-assessment checklist

Was the annual progress report published?	Yes
Was it done according to schedule? (Due 30 Sept. for most governments, 30 March for Cohort 1.)	Yes
Is the report available in the administrative language(s)?	Yes
Is the report available in English?	Yes
Did the government provide a two-week public comment period on draft self-assessment reports?	Yes
Were any public comments received?	No
Is the report deposited in the OGP portal?	Yes
Did the self-assessment report include review of consultation efforts during action plan development?	Yes
Did the self-assessment report include review of consultation efforts during action plan implementation?	Yes
Did the self-assessment report include a description of the public comment period during the development of the self-assessment?	Yes
Did the report cover all of the commitments?	No
Did it assess completion of each commitment according to the timeline and milestones in the action plan?	No

Summary of Additional Information

The government published its self-assessment on September 30, 2014. It used the public consultation forum *Otakantaa.fi* as a platform for public commenting. It opened a discussion on the page dedicated for the implementation of the action plan. The discussion did not generate any responses. The lack of response on the self-assessment could be due to three factors: 1) general public and CSO unawareness of and reluctance to use the consultation website, 2) lack of public interest in open government issues, and 3) the lack of impact that such commentary would produce. CSO representatives report that they were neither informed about the self-assessment nor the consultation website.

Officials presented a draft of the self-assessment for open discussion.¹ The self-assessment briefly evaluates the completion of the commitments, but it does not provide information on which specific commitments are on schedule or behind schedule. The self-assessment does not include information on specific milestones. In general, the self-assessment summarises actions related to OGP in Finland, some of which were not part of the action plan. It gives a detailed view on events the government organised, but those were not necessarily connected to specific commitments. The report also addresses key problems in the implementation, such as the low participation rates of citizens and CSOs and suggests improvements for the next action plan.

1. Ministry of Justice, "Avoimen hallinnon Suomen 1. Toimintasuunitelman itsearviointi," otakantaa.fi, <http://bit.ly/1ENsG2d>.

VI. Country Context

This section places the action plan commitments in the broader national context and discusses the concrete next steps for the next action plan.

Country context

In many ways, Finland is a model of open government. It has had freedom of information legislation since 1766.¹ In recent years, the government implemented numerous programmes and projects for improving open governance, democracy, and public services, for example the Action Program on eServices and eDemocracy (SADe) often mentioned in this report. The government programme introduced by PM Jyrki Katainen's government emphasised openness as one of the key values.²

However, there are still many issues related to open government that Finland could improve. The recent report on democracy policy names citizen participation as a central challenge³ for the Finnish democracy, as the Finns are interested in political issues but do not use the traditional forms of democratic participation as much as other Nordic countries do. Furthermore, while Finland has persistently been among the least corrupt nations in the world,⁴ the Finns have witnessed small- and large-scale corruption scandals since 2007,⁵ and the public has focused on this topic. It is therefore surprising the government has not addressed issues of corruption, campaign finance, and public ethics in the Finnish action plan. Another topic missing from the action plan is corporate accountability, which is a constant issue debated in the news and social media.

Stakeholder priorities

Overall, the Finnish action plan themes well represents the priorities of civil society organisations involved in the OGP process. However, only a very small part of civil society was involved in the development of the action plan or the IRM assessment process. It is therefore impossible to assess the priorities of civil society in general. Additionally, there was little evidence of government assessing how well the commitments themselves portray the interests of the stakeholders or their priorities within the themes.

The civil society representatives that participated in the stakeholder meeting during that assessment emphasised the importance of open procedures, particularly in drafting and consultation of laws, for civil society. In addition, they considered opening data and information related to public processes, projects, and procurement important. The current action plan addressed these issues to a certain degree, but the stakeholders also hope they will be further addressed in the next action plan. Officials also mentioned corporate accountability and private sector transparency in general as a priority for the next action plan. Additionally, they noted as priorities efforts to fight structural corruption and protect whistle-blowers.

Scope of action plan in relation to national context

In light of the Finnish country context, the results of the assessment process, and the stakeholder priorities mentioned above, the IRM researchers recognise that the current action plan includes many important themes, of which the open procedures and open knowledge themes would be particularly logical to keep in the next action plan. In addition, there are reasons to consider issues related to corporate accountability and public integrity as important additions to develop open government in Finland, and therefore valuable themes to be included in the next action plan.

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1. Juha Mustonen (ed.), *The World's First Freedom of Information Act - Anders Chydenius' Legacy Today* (Kokkola; Anders Chydenius Foundation, 2006), <http://bit.ly/1JA2eff>.
 2. Prime Minister's Office, "Pääministeri Jyrki Kataisen hallituksen ohjelma," [Prime Minister's Office, http://bit.ly/1uG16hy](http://bit.ly/1uG16hy).
 3. Ministry of Justice, "Avoin ja yhdenvertainen osallistuminen Valtioneuvoston demokatiapoliittinen selonteko 2014," Ministry of Justice, <http://bit.ly/1CuDh2E>.
 4. Transparency International, "Corruption perception index," Transparency International, <http://www.transparency.org/research/cpi/>.
 5. "Vaali johtaja: Vaalirahoituslain rikkominen melko yleistä," YLW, <http://bit.ly/1A9JdgU>

VII. General recommendations

This section recommends general next steps for the OGP process in Finland, rather than for specific commitments.

Crosscutting recommendations

The development and implementation of the first Finnish action plan so far can be considered a good effort. The action plan development process aimed to reach many people; the action plan clearly included topics introduced by the civil society. Moreover, there were a lot of activities even if the government did not implement many of the commitments as planned. However, there are a few general recommendations the IRM researchers offer for improving the OGP process in Finland.

Increasing participation of civil society

A key concern for the next action plan is increasing the participation of citizens and civil society organisations in the OGP process. Despite numerous events and marketing efforts, the OGP process did not involve many citizens or CSOs. There are a number of possible reasons for this and conclusions to draw from them.

One issue is the online presence of OGP in Finland. Interviewed stakeholders emphasised that OGP should have a dedicated and well-designed website, where stakeholders can find information easily. The current website is difficult to use and has low value in marketing efforts. Information regarding the action plan implementation is spread out between the OGP webpage on the Ministry of Finance's website; otakantaa.fi forum; the government's project register; and other places. The IRM researchers recommend the government dedicate a budget for designing and launching the website and for professionals to support its function. It's important to make the decision to use it as the primary source of information regarding OGP in Finland.

As the self-assessment points out, engaging citizens and CSOs proved challenging both during action plan development and the implementation period. Interviewed representatives from both government and civil society organisations agreed that participation in such a long process can be challenging, particularly for organisations with limited resources. Thus, the government should consider leaner modes of participation. For CSOs, workshops that aim to produce tangible results in a brief period of time and build relationships between civil society organisations and government could be a good option.

Generally, to get citizens and organisations to participate in the digital participatory platforms, they require more promotional efforts. Here, responsible civil servants could find it useful to learn how to engage these groups on social media. As the examples of several civil servants' activities on Facebook show, an active personal presence and a willingness to engage citizens can be an efficient way to generate feedback and discussion. Online engagement efforts would be most helpful in combination with offline interface building between CSOs and government.

Clearer formulation of commitments

It is understandable that the first action plan is a process of learning, and there is evidence that the requirements for the action plan changed while Finland was developing its action plan; however, it is still important to mention that there is much room for improving the quality of commitments in the Finnish action plan. The thematic grouping of the commitments had strengths, but it is apparent that some commitments and their individual milestones fit into the themes better than others. Some of the

commitments included a range of different and often rather separate milestones, while some had only one activity.

The IRM researchers recommend that the government formulates commitments to address a single, clearly identified, well-described societal challenge in relation to open government. In addition, they recommend that if the government uses milestones, they should include only a single activity in order to reach the target output. If the contribution is not clear, then the milestones should not be included in the commitment. Clearer formulation and grouping of activities could significantly improve the action plan's comprehensibility, monitoring, and implementation. The IRM researchers further recommend that the government should use the official OGP action plan template.¹

Many of the action plan's commitments and milestones were related to existing government projects. Generally, this is not an issue if it considers several aspects. If one of several milestones of a commitment is part of a project, it should be clear how it relates to the commitment. Officials should make clear in commitment wording how it relates to another project. The commitment should also include the planned schedule of that project, if it is available at the time of writing. Officials should also assign the task of ensuring that the project's progress is documented in the OGP context to persons responsible for the project.

Several commitments included pilots, of which some were not realised. If a pilot is part of a commitment, it should be clear what this pilot entails, so that it is clear who is carrying out the pilot and with whom, when it will be completed, and with what resources.

More ambitious commitments, more debate, more resources

Many commitments would have been completed without inclusion in the OGP action plan, since they were parts of other projects. It is also apparent that the government included many of the commitments and individual milestones because they were easy to implement, not because they addressed how civil society would have preferred to further the common objectives. With very few exceptions, the commitments did not include contested or debated issues. One of the exceptions was the commitment to help citizens access their personal information stored in registries, which deals with important questions about privacy and data ownership. Commitments like this have a possibility to have a deeper impact and, by generating debate between the government and civil society, could also increase the value of the OGP process and the attractiveness of open government issues in general.

The OGP process could be a valuable platform for fruitful debate between the government and the civil society. Evidence from the assessment indicates that while the government seemed to make an effort to reach different stakeholders and to develop open government, the process barely included members of civil society who position themselves as critics of the government. The IRM researchers recommend that the government should make a conscious effort to involve more critical voices in the process, who could then challenge the government to more ambitious commitments.

For the OGP process to work as a platform for debate, it is also necessary to increase the accountability elements of the action plan development and implementation phases. The stakeholders interviewed drew attention to the lack of documentation about what feedback the government received and how it processed it. It is important to note that the action plan itself includes a commitment to address similar issues in legislative consultation. Additionally, the implementation process should have more accountability elements. For example, the "inform about barriers" campaign could have had a different impact if the government had publicly addressed sometimes difficult yet important issues.

The IRM researchers noticed that in many cases the government referenced limited resources as the reason for shortcomings in the action plan implementation. Because the persons responsible for the commitment implementation usually have numerous other responsibilities and their organisations have limited budgets, the IRM researchers recommend that budgeting work time, financing, and other required resources be carried out hand-in-hand with the action plan development according to regular programme planning practices. IRM researchers also recommend having fewer commitments in the action plan, but with required resources, including both budgeting and personnel.

Making use of positive development

The Finnish OGP process produced outputs that the action plan did not include, most importantly the civil servants' open government network. Eighty-six members from ministries and agencies held regular meetings to exchange information on open government. This work is well documented on the OGP webpage of the Ministry of Finance.² Many interviewed government representatives feel that this network has significantly contributed to promoting open government values in ministries and agencies. Given the positive feedback, the government should give the network a more formal role in the next action plan.

The IRM researchers also note that some ministries that were not actively involved in the OGP process introduced activities relevant for the OGP: an example of this was the "corruption button" implemented by the Ministry for Foreign Affairs.³ The IRM researchers recommend engaging more ministries, state agencies, and municipalities into the OGP process, particularly those who are already aware of the issue's importance.

TOP FIVE 'SMART' RECOMMENDATIONS

1. Increasing participation of civil society. In order to enable participation by various civil society organisations in the OGP process, the Ministry of Finance could organise quarterly workshops during the development and implementation of the action plan, where government personally invites several civil society organisations. Online participation should also be possible. The government should document in detail the feedback received from the participants during the workshops and the way the feedback is taken into account and publish it for public monitoring on the dedicated OGP website.

2. Creating a dedicated website for OGP. In order to increase the visibility of the OGP process in Finland and to enable easy access to information related to OGP, the IRM researchers recommend that the Ministry of Finance establish a dedicated website prior to next implementation period, which would be the single point for OGP related information in Finland. Officials should acquire financing for this during the action plan development, and they should use professional web designers for design and implementation. The government should adopt co-design principles and involve OGP stakeholders. Finally, the government should use the website for all OGP-related information during action plan development and implementation in the future.

3. Promoting open procedures by means of accountability and training. Increasing openness of procedures is highly dependent on the commitment of civil servants and the organisational culture, which is difficult to change. It is important that common tools are used for all potential participants, whether they are civil servants, CSO representatives, politicians or citizens. The government could tackle this by means of accountability and training. In order to enforce the openness principles accepted by the Permanent State Secretaries, IRM researchers recommend that the government establish a service where both citizens and civil servants alike can be informed about practices in national public administration that could do better against these principles. The government would make these issues public and address them to the right agency, with an expectation that officials would also reply to them publicly. The Ministry of Finance would be in charge of establishing a project to develop the service using agile development methods during the first year of the second action plan implementation. In addition, officials would procure training and workshops for the civil servants from experts in order to develop capabilities related to open procedures and to promote turning the openness principles to practice.

4. Strengthening the citizen's rights to re-use his/her data by developing the government's My Data strategy. Access to information is a key value of Open Government Partnership, and access to information regarding oneself is considered a new basic human right of the digital world. It is recommended that the Ministry of Transport and Communication jointly with Ministry of Finance take the lead in developing the government's My Data strategy based on a recent report on the issue. The government would use the dedicated OGP website as a platform for regular updates and monitoring implementation, with the whole strategy development timeline visible. The strategy should involve other relevant ministries, civil society, private sector, and research institutions, and it should aim for practical implementation through IT solutions and legislative changes.

5. Involving openness networks of civil servants and municipalities in action plan development and implementation. The government has a limited influence over open government issues in ministries, government agencies, and municipalities. In order to develop open government practices and further their implementation in the mentioned organisations without the need to rely on legislation, IRM researchers recommend that the networks of civil servants in ministries, government agencies, and municipalities be used fully in developing and implementing the action plan. For example, the networks could have the responsibility of commenting on the feasibility of commitments from the viewpoint of their own agencies. In practice, the government should formalise the networks' role, develop their operating methods jointly with other OGP stakeholders, and allocate proper resourcing, particularly in terms of working time, in order to establish a solid organisation.

1 Open Government Partnership, "OGP National Action Plan Template and Guidelines," Open Government Partnership, <http://bit.ly/1DIIDxp>.

2. Ministry of Finance, "Avoin hallinto," Ministry of Finance, <http://bit.ly/1vKyZhG>

3. Ministry of Foreign Affairs in Finland, "Ministeri Haavisto: Ulkoministeriöllä ensimmäisenä "korruptionappi," Ministry of Foreign Affairs in Finland, <http://bit.ly/1BqCUY4>

VIII. Methodology and Sources

As a complement to the government self-assessment, well-respected governance researchers, preferably from each OGP participating country, write an independent IRM assessment report.

These experts use a common OGP independent report questionnaire and guidelines,¹ based on a combination of interviews with local OGP stakeholders as well as desk-based analysis. This report is shared with a small International Expert Panel (appointed by the OGP Steering Committee) for peer review to ensure that the highest standards of research and due diligence have been applied.

Analysis of progress on OGP action plans is a combination of interviews, desk research, and feedback from nongovernmental stakeholder meetings. The IRM report builds on the findings of the government's own self-assessment report and any other assessments of progress put out by civil society, the private sector, or international organisations.

Each local researcher carries out stakeholder meetings to ensure an accurate portrayal of events. Given budgetary and calendar constraints, the IRM cannot consult all interested or affected parties. Consequently, the IRM strives for methodological transparency, and therefore where possible, makes public the process of stakeholder engagement in research (detailed later in this section.) In those national contexts where anonymity of informants—governmental or nongovernmental—is required, the IRM reserves the ability to protect the anonymity of informants. Additionally, because of the necessary limitations of the method, the IRM strongly encourages commentary on public drafts of each national document.

Interviews and focus groups

Each national researcher will carry out at least one public information-gathering event. Care should be taken in inviting stakeholders outside of the “usual suspects” list of invitees already participating in existing processes. Supplementary means may be needed to gather the inputs of stakeholders in a more meaningful way (e.g., online surveys, written responses, follow-up interviews). Additionally, researchers perform specific interviews with responsible agencies when the commitments require more information than provided in the self-assessment or accessible online.

In the beginning of the assessment, the IRM researchers interviewed the Finnish OGP point of contact and her team to gather basic information on the OGP process in Finland. In addition, IRM researchers conducted a total of nine interviews with civil servants between 29 August and 12 September 2014. The interviewees were all designated as contact persons for the 18 commitments, and the interviews provided baseline information for commitment analysis. The interviews covered all the commitments. IRM researchers interviewed the civil servants individually, with one exception and recorded the interviews, which took an average of 45 minutes per commitment. Researchers gathered evidence of commitment aims, outputs, and impacts and then discussed the inclusion of the commitment in the next action plan. They asked interviewees to provide sources where applicable. Additionally they either searched for materials and evidence or gathered them from the interviewees.

In addition, IRM researchers interviewed nongovernmental stakeholders from Open Knowledge Finland and Open Ministry in order to get further information and an alternative view on the strengths and weaknesses of the OGP process in Finland. These interviews, which lasted more than an hour each, occurred in the latter part of September. Apart from the CSOs who were present in the OGP working group, few CSOs

were deeply involved in the whole OGP process, and those that were, were reluctant to comment on individual commitments or milestones.

The IRM researchers organised three separate windows for civil society participation in the assessment:

1. The IRM researchers used the national public consultation forum, *Otakantaa.fi*,² to provide a single point for information related to the IRM assessment. In addition, they posted several surveys on the forum in order to enable feedback from outside the capital area and detailed feedback particularly on the individual commitments. The researchers, with assistance from government representatives, marketed the assessment and the forum page via the Ministry of Finance's OGP webpage, several governmental and nongovernmental Facebook groups, mailing lists, and word-of-mouth. The surveys were open during the whole of September 2014, but civil society did not comment on them.
2. The IRM researchers participated in the Open Finland 2014 fair event, providing information on the IRM assessment on one stand and participating in discussion regarding open government during the event that took place on 15–16 September 2014. The IRM researchers suggested open government as one topic for the open space discussions, but there was no interest, so they received little feedback for the assessment during the event.
3. The IRM researchers organised a dedicated stakeholder meeting, or focus group, in Helsinki on 18 September 2014. They marketed the event on the website, on the forum page, on Facebook groups, and during the Open Finland event. Five civil society representatives participated, some of which had not been involved in the OGP process and some of which had been deeply involved. During the two hour meeting, stakeholders discussed the country context, stakeholder priorities, and some details of the commitments.

Document library

The IRM uses publicly accessible online libraries as a repository for the information gathered throughout the course of the research process. All the original documents, as well as several documents cited within this report, are available for viewing and comments in the IRM Online Library in Finland at http://bit.ly/research_plan_finland

1. Full research guidance can be found in the IRM Procedures Manual, available at: <http://bit.ly/17vvlCc>

2. Oxford Research Oy, Suomen avoin hallinnon kumppanuusohjelman riippumaton arviointi, "otakantaa.fi", <http://bit.ly/17vvplt>

About the Independent Reporting Mechanism

The IRM is a key means by which government, civil society, and the private sector can track government development and implementation of OGP action plans on a bi-annual basis. The design of research and quality control of such reports is carried out by the International Experts' Panel, comprised of experts in transparency, participation, accountability, and social science research methods.

The current membership of the International Experts' Panel is:

- Yamini Aiyar
- Debbie Budlender
- Jonathan Fox
- Rosemary McGee
- Gerardo Munck

A small staff based in Washington, DC shepherds reports through the IRM process in close coordination with the researcher. Questions and comments about this report can be directed to the staff at irm@opengovpartnership.org