Independent Reporting Mechanism (IRM): Finland Progress Report 2015–2016

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Executive Summary: Finland

Independent Reporting Mechanism (IRM) Progress Report 2015–2016

Finland's action plan focused on improving citizen engagement and making government information easier for citizens to understand. The government applied new methods to collect citizens' views and successfully increased the number of plain language documents in high priority areas, such as health and pension regulations. Going forward, the government could prioritize issues that are of high value to civil society, such as corporate transparency, by using the OGP platform to coordinate ministerial support and multiagency consultation.

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. Finland began participating in OGP in March 2013. The Independent Reporting Mechanism (IRM) carries out a biannual review of the activities of each country that participates in OGP.

The Ministry of Finance is responsible for coordinating the OGP process in Finland. The ministry has limited power to compel other government agencies to implement OGP commitments. To support the implementation of the second action plan, the Ministry of Finance appointed the OGP Support Group in May 2015, which includes 16 civil servants from ministries, government agencies, and local governments and five representatives from civil society organizations (CSOs).

OGP process

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

In Finland, the development of the national action plan lasted for nine months and was a participatory process. It included online consultations as well as in-person meetings with civil servants and CSO representatives. The government conducted awareness-raising activities, including workshops, roundtable discussions, and a newsletter. Although commitment development was collaborative, the OGP team at the Ministry of Finance retained the final word on which themes and activities to include in the action plan.

At a Glance:

Member since:	2012
Number of commitments:	4

Level of Completion:

Completed:	0
Substantial:	3
Limited:	1
Not started:	0

Commitment Emphasis:

Access to information:	3
Civic participation:	3
Public accountability:	0
Tech. & innovation for transparency & accountability:	2

Commitments That Are

Clearly relevant to an OGP value:	4
Of transformative potential impact:	0
Substantially or completely implemented:	3
All three (✪):	0

This report was prepared by the IRM staff with contributions from Juho-Matti Paavola from Oxford Research Finland

The OGP Support Group meets several times per year to discuss action plan implementation. Since most of the activities in the national action plan are voluntary in nature, the Support Group draws on several networks to successfully implement commitments. The Ministry of Finance does not regularly update its website with information on action plan progress; however, the OGP Support Group began publishing its meeting notes online following the first year of implementation.

The government published the draft self-assessment report on 1 September 2016, and it was available for public comment for a two-week period. The report details individual activities related to each commitment, but it does not specifically define completion levels or explain why certain activities have not progressed as expected.

Commitment Implementation

As part of OGP participation, countries make commitments in a two-year action plan. The Finland action plan contains four commitments. The following tables summarize for each commitment the level of completion, potential impact, whether it falls within Finland's planned schedule, and the key next steps for the commitment in future OGP action plans.

Note that the IRM updated the star criteria in early 2015 in order to raise the standard for model OGP commitments. Under these criteria, commitments must be highly specific, relevant to OGP values, of transformative potential impact, and substantially completed or complete. Finland received 0 starred commitments.

Table 1: Assessment of Progress by Commitment

COMMITMENT SHORT NAME	POTENTIAL IMPACT				LEVEL OF COMPLETION			
	NONE	MINOR	MODERATE	TRANSFORMATIVE	NOT STARTED	LIMITED	SUBSTANTIAL	COMPLETE
1. Clear Administrative Language								
1.1. Promoting OGP values with local authorities								
1.2. Official parlance clearer								
1.3. Material in plain language								
1.4. Visualizations used								
1.5. Webpages compatible with assistive devices								
1.6. Services easily found online								
2. Government as Enabler								
2.1. Procedures to open datasets								
2.2. Personal records service								
2.3. Proposal for coordinating support for voluntary work								
2.4. Proposals for removing barriers of voluntary work								
2.5. E-participation practices								
2.6. Access to e-services in rural areas					UNCLEAR			
2.7. E-participation tools used								
2.8. Access to information for voluntary work								
2.9. Democracy recognition								
3. Open Procedures								
3.1. Project register (HARE) opened and used								
3.2. HARE (project register) is well known								
3.3. Updating instructions for legislative drafting								
3.4 and 3.5. Increasing webcasts and social media use								
3.6. Assessing need for lobbying register								

3.7. Open government presented in International Anti-Corruption Day								
3.8. Open government principles applied internally								
4. Engagement of Children, the Youth, and the Elderly								
4.1. Engaging children and youth in the state government								
4.2. Advice on engaging different age groups								
4.3. Experimentation of engagement methods								
4.4. Participation camp								
4.5. Engagement study								

Table 2: Summary of Progress by Commitment

NAME OF COMMITMENT	SUMMARY OF RESULTS
1. Clear administrative language • OGP value relevance: Clear • Potential impact: Minor • Completion: Substantial	This commitment aims to provide clearer and more understandable government information by making government websites more user-friendly and using plain language texts and visualizations. The government has made limited progress in improving administrative language. A total of 21 plain text documents and websites were produced between 2015 and 2016, representing only a small fraction of all government materials. The government has begun drafting a bill to align government websites with EU standards. Moving forward, the IRM researcher recommends increasing the amount of materials published in plain language and involving civil society in selecting priority policy areas for language simplification.
2. Government as an enabler • OGP value relevance: Clear • Potential impact: Minor • Completion: Substantial	This commitment includes three thematic areas for improvement: opening datasets, increasing access to e-services for disadvantaged populations, and simplifying regulations for voluntary work. The government has established some open data guidelines and has released a number of datasets, such as public vehicle registration information. Also, it created a new website with guidelines on voluntary work. However, there has been no progress in creating e-participation opportunities for disadvantaged or rural citizens. Moving forward, the government could focus on improving access to e-participation tools in rural areas, allowing citizens to propose and provide feedback on legislation.
3. Open procedures • OGP value relevance: Clear • Potential impact: Minor • Completion: Limited	This commitment aims to increase government transparency through various activities, including publishing information on government projects in a public registry and creating a lobbying register. The government updated an existing project registry that will include searchable information on government spending and agencies responsible for projects. And it plans to publicly release the registry in 2017. The government has not conducted a needs assessment for creating a lobbying register. Moving forward, the IRM researcher recommends publicly launching the project register and seeking feedback from civil society early in the project and policy development stages.

4. Engagement of children, the youth, and the elderly • OGP value relevance: Clear • Potential impact: Minor • Completion: Substantial	This commitment sets a goal of engaging more children, youth, and elderly people in government decision making and the service delivery process. The government involved this demographic in drafting a Youth Act in April 2014 and partnered with CSOs to publish guidelines for consulting different age groups in policy making. Several engagement events were carried out with youth groups and elder councils, though it is unclear how their feedback will be incorporated in policymaking. Many of the planned activities are preparatory, and how they impact civic participation will depend on how they are implemented. Going forward, the IRM recommends focusing on integrating lessons learned from experimental engagement strategies into trainings for civil servants. Additionally, a best practice guide based on lessons-learned should be developed and published.

Recommendations

While positive progress has been made in implementing the commitments, some areas need strengthening and reinforcing. A main recommendation is that stakeholders and the government work together to shift the focus from improving government processes to tackling more diverse issues, such as government transparency, civic participation, and accountability. To achieve this, including more CSOs beyond "the usual suspects" could lead to greater civil society engagement and could produce commitments with a higher potential to effect major changes in government practice. In addition, the IRM recommends focusing on creating clear, relevant commitments with measurable benchmarks to assess progress.

Beginning in 2014, all OGP IRM reports include five key recommendations about the next OGP action planning cycle. Governments participating in OGP will be required to respond to these key recommendations in their annual self-assessments. These recommendations follow the "SMART" logic: they are specific, measurable, answerable, relevant, and timebound. Given these findings, the IRM presents the following key recommendations:

Table 3: Top Five SMART Recommendations

• Improve commitment quality through better problem-solution framing, clarifying relevance to OGP values, and identifying verifiable milestones.
• Design specific commitments within the framework of longer-term activities that take place over several action plan cycles (i.e., one- or two-year benchmarks in longer programs of work).
• Diversify participation in OGP by opening meetings and creating opportunities for new actors in high-priority areas like corruption and corporate transparency to propose and monitor commitments.
• Identify civil society partners to monitor each commitment.
• In order to create a more ambitious action plan, the OGP Support Group should improve multiagency coordination and ministerial support around complex issues, such as corporate transparency.

Eligibility Requirements: 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, see Section IX on eligibility requirements at the end of this report or visit bit.ly/1929F11.

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 (IRM) assesses development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.

I. National Participation in OGP

1.1 History of OGP participation

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. OGP provides an international forum for dialogue and sharing among governments, civil society organizations, and the private sector, all of which contribute to a common pursuit of open government.

Finland began its formal participation in May 2012 when then Minister of Public Administration and Government Henna Virkkunen declared her country's intention to join the initiative.[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, for strengthening citizen engagement, and for fighting corruption. Objective, third-party indicators are used to determine the extent of country progress on each of the dimensions. See Eligibility Requirements (Section IX of this report) for more details.

All OGP-participating governments develop OGP action plans that advance concrete commitments over an initial two-year period. Action plans should outline OGP commitments that move government practice beyond the status quo. 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 first national action plan between September 2012 and March 2013. Implementation was completed in June 2015. Development for the second national action plan took place between August 2014 and April 2015. The period of implementation for the second national action plan is 1 July 2015 through 30 June 2017. This midterm progress report covers the first year of implementation from 1 July 2015 to 30 June 2016.

Beginning in 2015, the IRM also publishes end-of-term reports to describe the final status of progress at the end of the action plan's two-year period. Any activities or progress made after the first year of implementation will be assessed in the end-of-term report.

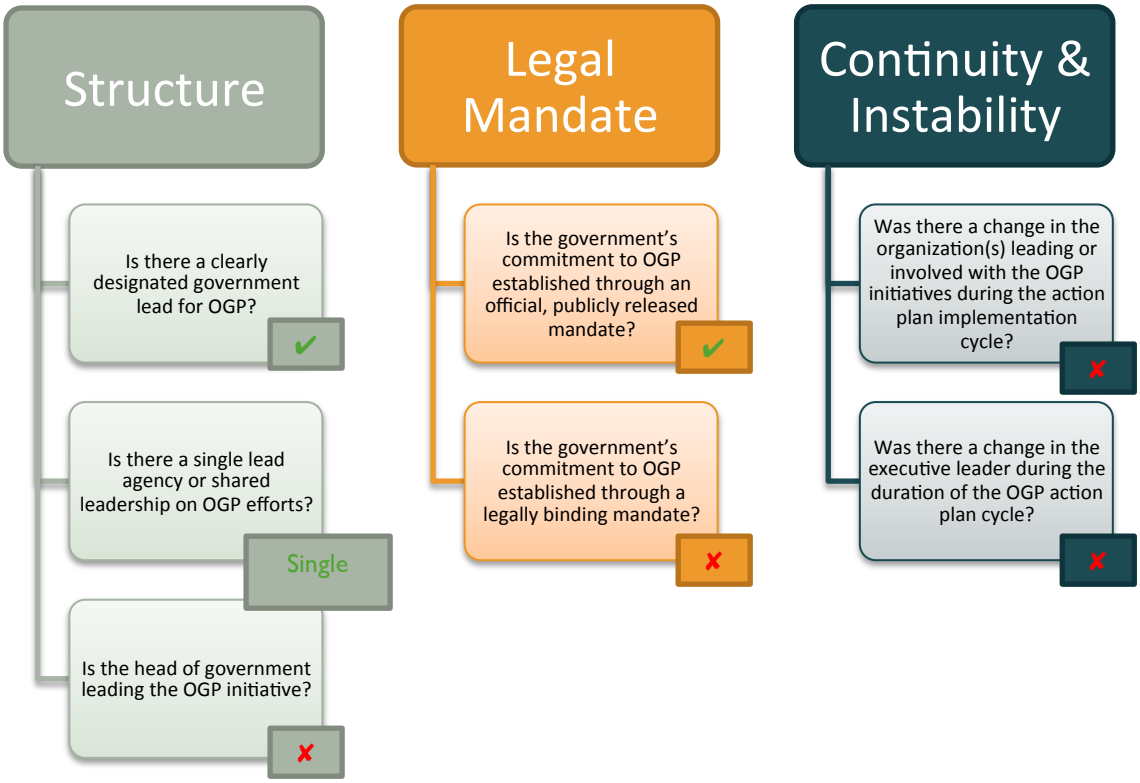
The government published its midterm self-assessment report for the second action plan in September 2016. In addition, the government has planned a kickoff event to launch the development process for the 2017–2019 action plan.

The Independent Reporting Mechanism (IRM) partnered with Oxford Research Finland to evaluate Finland's development and implementation of the second national action plan. The IRM aims to inform ongoing dialogue around development and implementation of future commitments in each OGP-participating country. Methods and sources are covered in Section VI of this report.

1.2 OGP leadership in Finland

This subsection describes the leadership and institutional context for OGP in Finland. Table 1.1 summarizes this structure, while the narrative section provides additional detail.

Table 1.1: OGP Leadership in Finland



Finland is a representative democracy with executive, legislative, and judicial branches of government. Finland joined the Open Government Partnership in 2013 and implemented its first action plan in 2013–2015. The second action plan is in progress (2015–2017) and is led by a single agency in the executive branch: the Personnel and Governance Policy Department. OGP is not legally mandated in Finland, but the second national action plan is approved and monitored by the Minister of Local Government and Local Reforms (Anu Vehviläinen).

The Ministry of Finance is well placed to lead the OGP process. It is responsible for the overall development of the national government, as well as the legislative and financial requirements of local government. However, the Ministry of Finance has limited power to direct other ministries, agencies, or municipalities because each operates with a degree of autonomy. Therefore, without legislative measures or decrees, the implementation of OGP commitments depends to a large extent on the political will of the relevant government agency.

The Ministry of Finance's budget for OGP-related activities is EUR 40,000 per year. A core team of four civil servants, including one secretary and three senior civil servants, is responsible for coordinating OGP. The Ministry of Finance has allocated nine months as the time frame for coordinating work on OGP recommendations.

A change in government took place during the action plan development period. Parliamentary elections were held in the spring of 2015, and a new Parliament took office in May 2015. While it is unlikely that the change influenced the content of the national action plan, it may have affected the level of political interest and commitment to carrying out scheduled activities.

1.3 Institutional participation in OGP

This subsection describes which state institutions were involved at various stages in OGP. The next section will describe which nongovernmental organizations were involved in OGP.

Table 1.2: Participation in OGP by Government Institutions

How did institutions participate?		Ministries, departments, and agencies	Legislative branch	Judiciary (including quasi-judicial agencies)	Others, including constitutional, independent, or autonomous bodies	Subnational governments
Consult[2]	**Number**	Approx. 70	0	0	Few	Approx. 10–20
	Which ones?	Members of the OGP Working Group[3] Members of the OGP Working Committee[4] Members of the Civil Servants Network[5] All ministries and administrative sectors.			Members of the OGP Working Group Members of the OGP Working Committee Members of the Civil Servants Network	Members of the OGP Working Group Members of the OGP Working Committee Members of the Civil Servants Network
Propose[6]	**Number**	N/A	N/A	N/A	N/A	N/A
	Which ones?	N/A	N/A	N/A	N/A	N/A
Implement[7]	**Number**	4	0	0	0	0
	Which ones?	Ministry of Finance Ministry of Justice Ministry of Transport and Communication Ministry of Education and Culture				

The Open Government Team, based in the Ministry of Finance, coordinates the action plan implementation. Previously, before they were disbanded in 2014, the OGP Working Group within the MoF also provided input for the action plan.

In May 2015, the Ministry of Finance appointed the Open Government Support Group. The group consists of 16 civil servants from the national and local government, in addition to five CSOs.[8] The Support Group assists in carrying out implementation of the action plan and encourages public officials to include open government initiatives in policymaking. Every four years, the Advisory Board on Civil Society Policy (KANE) is appointed within the Ministry of Justice, and is responsible for steering open government work at the national level.

Additional state and local government actors also participate in the OGP process. The Civil Servants Network includes around one hundred members from state ministries and

agencies. The network meets several times per year to discuss issues and policies related to open governance,[9] and members champion reform in their own agencies. The Finnish Association of Local and Regional Authorities coordinates the Municipal Democracy Network, a close partner of the Civil Servants Network that focuses on implementing open government policies at the municipal level (see government self-assessment report for more details).

In developing the second action plan, government institutions were consulted during OGP events, workshops, and through online surveys. The government organized consultation events in each of the 12 administrative sectors, and most of the participants were from executive ministries, departments, and agencies. The legislative and judicial branches have not been heavily involved in OGP.

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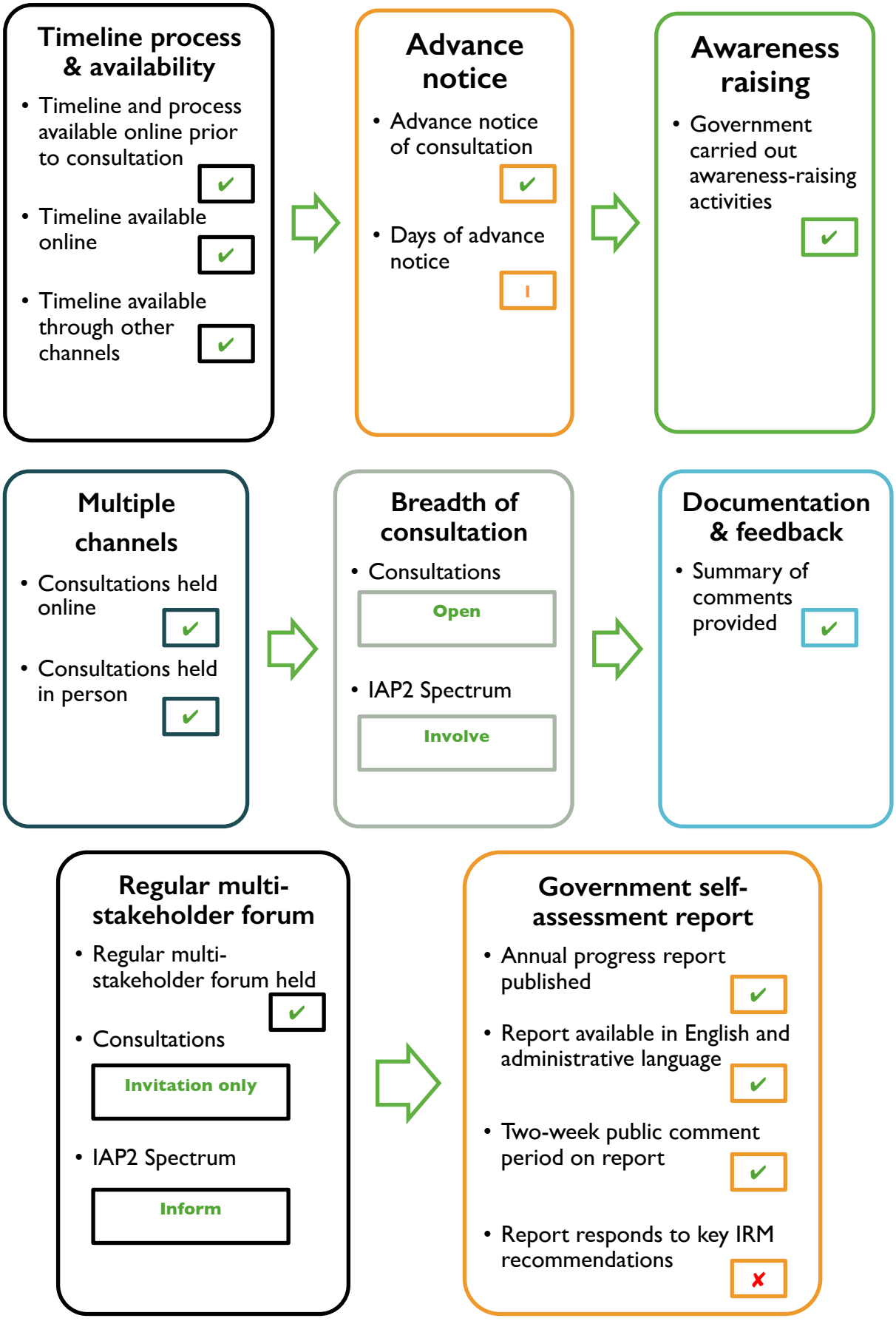
1 Link to letter: http://www.opengovpartnership.org/sites/default/files/LOI%20Finland.png.
2These institutions were invited to participate in development of the action plan, but may or may not be responsible for commitments in the action plan.
3 Members of the OGP Working Group are listed here: http://vm.fi/documents/10623/1194802/Hankkeen+asettamisp%C3%A4%C3%A4t%C3%B6s.pdf/24aafd26-0bd8-4f28-822e-c40123e9eef7.
4 Members of the OGP Working Committee included civil servants from four ministries and from two state agencies.
5 Members of the Open Government Civil Servants Network are listed here: http://vm.fi/documents/10623/1194961/Avoimen+hallinnon+virkamiesverkosto+9.11.2015.pdf/11433a04-1000-4721-a969-55bff19e9488.
6 These institutions proposed commitments for inclusion in the action plan.
7 These institutions are responsible for implementing commitments in the action plan whether or not they proposed those commitments.
8 The five CSOs are: Suomen Nuorisoyhteistyö–Allianssi ry (Finnish Youth Cooperation), Allianssi ry SOSTE Suomen sosiaali ja terveys ry (the Finnish Social and Health Association),
Mannerheimin Lastensuojeluliitto (Mannerheim League for Child Welfare),
ENTER ry (Association for helping elderly with information technology), and Valli ry (The Union for Senior Services).
9 Minutes of the meetings of the Open Government Civil Servant Network: http://vm.fi/hallinnon-avoimuus/avoin-hallinto/virkamiesverkosto.

II. National OGP Process

Finland's OGP process included workshops, roundtable discussions, and newsletter updates. Advance notice and awareness raising were primarily conducted through government mailing lists, and going forward advance notice for events could be publicized to a wider selection of stakeholders. However, the timeline was published online, and the government created multiple opportunities for citizens to participate in providing feedback on the action plan. Ongoing multi-stakeholder consultation could be improved by engaging more CSOs and surveying citizens during the implementation period.

Countries participating in OGP follow a set of requirements for consultation during development, implementation, and review of their OGP action plan. Table 2.1 summarizes the performance of Finland during the 2015–2017 action plan.

Table 2.1: National OGP Process



2.1 Action plan development

The development of the second action plan started with a kick-off workshop in Helsinki, held on 28 August 2014, and continued through February 2015. Invitations to the event were distributed to civil society organizations, citizens, and civil servants who had previously participated in the OGP process. According to a government official, the timeline and event invitation were available on the Ministry of Finance's website at least two weeks prior to the workshop.[1] Eleven civil society organizations, 14 civil servants from municipalities, 31 state government officials, and one private-sector representative attended the workshop. The topics proposed during the discussion were later circulated for comment and had 48 respondents: 38 civil servants, four CSO representatives, one private-sector representative, and five private citizens.

The government used a newsletter[2] and events for awareness raising about the action plan prior to consultation. The consultation process[3] consisted of online participation via government websites and in-person consultation events. Some examples include a workshop arranged at the Open Finland 2014 conference that collected commitments for inclusion in the action plan. A public, online consultation was also held through the Otakantaa.fi website from 25 September to 3 November 2014, and 11 roundtable discussions were held for civil servants to comment on the action plan. To engage citizens, input from individuals was gathered through random surveys at Christmas markets.

In December 2014, the Advisory Board on Civil Society Policy (KANE) met to discuss the draft action plan. Most of the process was open to anyone, and only some of the additional government-focused events were closed to the public. From 20 December 2014 to 30 January 2015, the draft action plan was available online for public comment and consultation.[4]

The government published information about how the action plan was revised to incorporate stakeholder feedback provided during consultations.[5] Throughout the action plan development process, the majority of input came from civil servants, who made up 80 percent of the participants at the kick-off workshop and whose commentary accounted for 80 percent of feedback received at the event. Civil society organizations were involved in developing the action plan but to a smaller degree. Some CSOs[6] said that the government did not explain the process clearly. The CSO representatives said that they were unsure how much influence stakeholders could have on the action plan and how the government would choose which commitments and activities to include.

A representative from Transparency International[7] felt that the government did not sufficiently incorporate input received from a group of CSOs. Transparency International (TI) Finland and Open Knowledge Finland, in conjunction with other CSOs, drafted 11 commitments to include in the national action plan. The government did incorporate some of their ideas related to open data. However, TI Finland and others felt that the most relevant and important commitments proposed, such as those on private-sector transparency, were not included or addressed. This has resulted in less civil society interest and engagement in the OGP implementation process.

2.2 Ongoing multi-stakeholder forum

Following development of the action plan, as part of their participation in OGP, governments commit to establishing a forum for regular multi-stakeholder consultation on OGP implementation. This can be an existing entity or a new one.

In Finland, the consultation process for implementing the action plan is a shared responsibility among several groups: the Open Government Support Group, the Civil Servants Network, the Local Democracy Network, and the Advisory Board for the Civil Society Policy.

The OGP Support Group is responsible for facilitating the implementation of the action plan and organizing the self-assessment. Members meet several times per year in Helsinki to plan commitment implementation and discuss issues related to the process.

Since most of the activities in the national action plan not legally mandated, the Support Group draws on several networks to implement commitments in the action plan. The other three networks—the Open Government Civil Servants Network,[8] the Local Democracy Network, and the Advisory Board for the Civil Society Policy[9]—are composed of national civil servants, local civil servants, and CSOs. All three groups support implementation and provide input on commitment development. It is unclear how often each group communicates with the OGP Support Group or what degree of influence each has on the decision-making process.

Civil servants created most of the commitments, and as a result the action plan primarily focused on improving access to information about government processes. Consequently, only a few civil society groups were engaged during the implementation period, resulting in a lack of diverse viewpoints. Furthermore, it is difficult for civil society groups not directly involved with specific commitments to influence the implementation.

Early on, the Ministry of Finance did not regularly update information about commitment progress on its website. Although the OGP Support Group began publishing its meeting notes online after the first year of implementation, the group's meetings and most ongoing consultation events remain invitation-only. The IRM researcher believes that CSOs not directly involved in the group were not aware of the implementation process, and may not have received enough information about how to participate.[10]

2.3 Self-Assessment

The OGP Articles of Governance require that participating countries publish a self-assessment report three months after the end of the first year of implementation. The self-assessment report must be made available for public comments for a two-week period. This section assesses compliance with these requirements and the quality of the report.

The government uploaded the self-assessment report in the online consultation platform, Otakantaa.fi, on 1 September 2016, and the comment period was open until 16 September 2016.[11] The IRM researchers could not find evidence that the comment period had been publicly advertised through channels such as the Ministry of Finance's OGP webpage, Twitter, the newsletter, or the Finnish Open Government Facebook group.

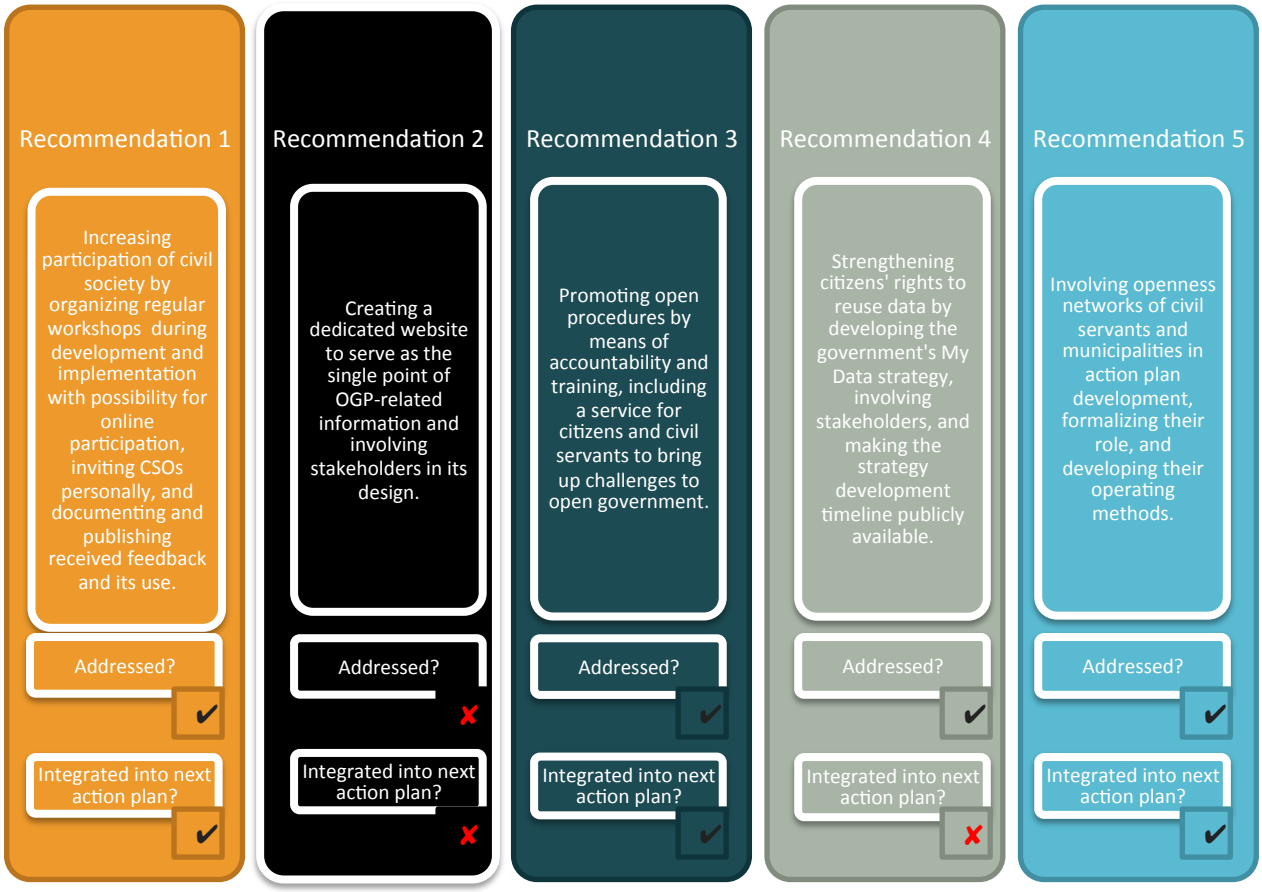
The draft self-assessment report reviewed by the IRM researchers included a short description of the action plan development consultation processes, which described the main design principles of the development process. The draft also states which bodies are governing the action plan implementation, but does not provide details on the limited consultation during implementation. The report describes the many individual activities related to each commitment in detail but does not specify completion levels or elaborate on why certain activities have not progressed as expected. In many cases the report uses web links to provide additional evidence of achievements.

2.4 Follow-up on previous IRM recommendations

The government addressed four of the five IRM recommendations and incorporated three in the new action plan. The government integrated the IRM recommendation to include CSOs involved with children, youth, and the elderly in the development of commitment 4. (CSOs are able to participate in the OGP process, but the degree to which they can influence action plan development and implementation remains unclear.) For technical reasons, the government does not have plans to address recommendation 2, which is related to

improving the OGP webpage. Recommendation 3, which promotes open procedures through accountability training, has been partially addressed; the civil service has incorporated trainings to improve open government. However, the government has not yet changed any accountability practices. Regarding recommendation 4 (improving MyData and reuse), the government is including it as part of another government program. Finally, the government incorporated recommendation 5, which is an effort to develop networks between civil servants and municipalities in order to address procedures and methods for carrying out the action plan.

Table 2.2: Previous IRM Report Key Recommendations



1 Link to the Ministry of Finance's OGP webpage: www.avoinhallinto.fi. For full timeline information and graphic representation of events, see the government's self-assessment report http://www.opengovpartnership.org/country/finland/assessment.
2 Beginning in June 2016 copies of the newsletter are also posted on the government's OGP webpage at http://vm.fi/hallinnon-avoimuus/avoin-hallinto.
3 Link to the action plan: http://www.opengovpartnership.org/sites/default/files/OGP_Action_Plan_Finland-2015_2017.pdf.
4 The draft action plan was published on lausuntopalvelu.fi, a new consultation service that is part of the democracy.fi portal. Link to the action plan: http://www.opengovpartnership.org/sites/default/files/OGP_Action_Plan_Finland-2015_2017.pdf.
5 The document can be found on the open government webpage: http://vm.fi/documents/10623/1332423/Lausuntojen+huomiointi+avoimen+hallinnon+toimintasuunnitelma.pdf/ef7a5b7a-6f27-4f91-82e9-962af8f24793.

6 Interview with Transparency International, August 2016; Interview with Allianssi, August 2016.
7 Interview August 2016.
8 List of members is available on the open government website: http://vm.fi/documents/10623/1194961/Avoimen+hallinnon+virkamiesverkosto+9.11.2015.pdf/11433a04-1000-4721-a969-55bff19e9488.
9 http://www.oikeusministerio.fi/kane/fi/index/kanentoiminta/kanenkokoonpano.html.
10 In the survey, seven out of eight respondents stated that they had not received enough information on how to help monitor the implementation of the national action plan..
11 Link to consultation platform: https://www.otakantaa.fi/fi/hankkeet/94/.

III. Analysis of Action Plan Contents

All OGP-participating governments develop OGP action plans that include concrete commitments over a two-year period. Governments begin their OGP action plans by sharing existing efforts related to open government, including specific strategies and ongoing programs.

Commitments should be appropriate to each country's unique circumstances and challenges. OGP commitments should also be relevant to OGP values laid out in the OGP Articles of Governance and Open Government Declaration signed by all OGP-participating countries.

What makes a good commitment?

Recognizing 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 report details each of the commitments the country included in its action plan, and analyzes them for their first year of implementation.

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

- **Specificity:** The IRM researcher first assesses the level of specificity and measurability with which each commitment or action was framed. The options are:
    - **High** (Commitment language provides clear, verifiable activities and measurable deliverables for achievement of the commitment's objective)
    - **Medium** (Commitment language describes activity that is objectively verifiable and includes deliverables, but these deliverables are not clearly measurable or relevant to the achievement of the commitment's objective)
    - **Low** (Commitment language describes activity that can be construed as verifiable but requires some interpretation on the part of the reader to identify what the activity sets out to do and determine what the deliverables would be)
    - **None** (Commitment language contains no measurable activity, deliverables or milestones)

Relevance: The IRM researcher evaluated each commitment for its relevance to OGP values. Based on a close reading of the commitment text as stated in the action plan, the guiding questions to determine the relevance of the commitment to OGP values are:

- **Access to Information:** Will government disclose more information or improve quality of the information disclosed to the public?
- **Civic Participation:** Will government create or improve opportunities or capabilities for the public to inform or influence decisions?
- **Public Accountability:** Will government create or improve opportunities to hold officials answerable to their actions?
- **Technology & Innovation for Transparency and Accountability:** Will technological innovation be used in conjunction with one of the other three OGP values to advance either transparency or accountability?[1]

- **Potential impact:** The IRM is tasked with assessing the *potential impact* of the commitment, if completed. The IRM researcher uses the text from the action plan to:
    - Identify the social, economic, political, or environmental problem;
    - Establish the status quo at the outset of the action plan and;
    - Assesses the degree to which the commitment, if implemented, would impact performance and tackle the problem.

Starred commitments are considered exemplary OGP commitments. In order to receive a star, a commitment must meet several criteria:

- It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity.
- The commitment's 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.
- The commitment would have a "transformative" potential impact if completely implemented.[2]
- Finally, the commitment must see significant progress during the action plan implementation period, receiving an assessment of "substantial" or "complete" implementation.

Based on these criteria Finland's action plan did not contain any starred commitments. Finally, the graphs in this section present an excerpt of the wealth of data the IRM collects during its progress reporting process. For the full dataset for Finland and all OGP-participating countries, see the OGP Explorer.[3]

General overview of the commitments

The themes of the action plan include clarifying government language, opening data, and enhancing citizen engagement. The action plan aims to improve the transparency of government procedures while encouraging under-represented groups, such as youth, elderly, and disabled citizens, to participate in decision making. These themes are organized in four broad commitments, each composed of multiple, noncumulative milestone activities.

It should be noted that the Finnish and the English versions of the action plan are not identical: one milestone was missing from the English version, and some additional information or phrasing varies between the two versions. The IRM researcher has chosen to use the more complete version in all cases.

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[1] Procedures Manual & Articles of Governance explaining OGP value relevance.
[2] The International Experts Panel changed this criterion in 2015. For more information visit http://www.opengovpartnership.org/node/5919.
[3] bit.ly/1KE2Wil.

Commitment 1. Clear Administration

Commitment Text:

Status quo or problem/issue to be addressed:

The structure of the government is complex and language used is difficult to understand. It is not easy for citizens to understand where and how decisions are made and prepared.

Commitments on clear administration were already in the first Finnish Action Plan. Ministries, agencies and municipalities have already done many things: developing the language in legislation, renewing the webpages and clearing the language of customer letters and administrative instructions. In some cases the citizens have been part in the co-designers in the processes.

The clarity of the customer letters enhances the quality and productivity of the process: the number of contacts and complaints to the service centers afterwards decline, when citizens understand what the decision means and what the reasons for such a decision are.

Government work is mostly based on language, since both written texts and oral communication are parts of official parlance. Respectively, most of the communication and interaction problems in government are solved by enhancing the official parlance.

The work towards a clearer administration is on a good track, but there still is a lot of work to be done. Major ongoing reforms are targeting clearer language, structure and governance models. There is a risk, that in change situations citizens experience government to be even more confusing and distant and their participation possibilities faint.

The need to enhance the clarity of the language and structures in the administration was strongly raised during face-to-face meetings with citizens.

Main objective:

Clear structures and processes in addition to customer orientation are targeted in major reforms. Structures and processes are described so that citizens know which authority should be contacted in different issues.

The official parlance is correct, clear and easy to understand. Information on issues under preparation is available and can easily be found. Administration takes feedback and takes account of it when developing its ways of working.

Milestones:

1.1. The structures and processes of the government are clear and customer oriented and they have been described intelligibly. Indicator: survey 2015 and 2017

1.2. The official parlance is clearer than previously. Indicator: The number of agencies and municipalities, which have enhanced the comprehensibility of their texts according to customer feedback. Survey 2015 and 2017

1.3. Ministries, agencies and municipalities provide material also in plain language. Indicator: Number of publications provided in plain language. Survey 2015 and 2017.

1.4. Visualizations (infographics) are used in government publications. Indicator: Number of agencies using visualizations. Survey 2015 and 2017.

1.5. The government web-pages are accessible and compatible with assistive devices. Indicator: estimate now 5 %, comparison with the estimate of year 2017

1.6. Government services are easily found in the Internet. Indicator: Survey 2015 and 2017.

Responsible institution: Ministry of Finance

Supporting institution(s): Ministries, agencies, municipalities, Association of local and regional authorities, Institute for the Languages of Finland
Start date: 1.7.2015 ..... **End date:** 30.6.2015

Commitment Overview	Specificity				OGP value relevance				Potential impact				On-time	Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative		Not started	Limited	Substantial	Complete
Overall			✔		✔					✔			Yes			✔	
1.1. Clear structures and processes			✔		✔					✔			✔			✔	
1.2. Official parlance clearer			✔		✔					✔			✔			✔	
1.3. Material in plain language		✔			✔					✔			✔		✔		
1.4. Visualizations used			✔		✔					✔			✔			✔	
1.5. Webpages compatible with assistive devices		✔			✔					✔			✔		✔		
1.6. Services easily found online		✔			Unclear					✔			✔			✔	

Context and Objectives

This commitment aims to provide clear information about government structures and processes to ensure that citizens understand how decisions are made. This is to be achieved by increasing the use of plain language texts, creating data visualizations, and making government information more user friendly.

Issues of clarity in official government language have been an ongoing challenge in Finland. For example, the Social Insurance Institution (Kela) receives well over 25,000 phone calls each year about customer letters and other written information it sends out to citizens.[1] In 60 percent of these cases, Kela includes the necessary information in the letter, but the reader does not understand the text.[2] The need for clarity is underscored by current government reform projects, such as a major restructuring of regional governments and the Health and Social Services Agency. These changes will significantly affect service delivery for every citizen;[3] therefore, it is essential to provide the public with the opportunity to easily understand and participate in improving public services.

Completion

Many of the commitment activities include indicators for successful implementation but do not provide specific target numbers or values to assess completion. For example, the indicator for improving the clarity of government documents (1.2) is defined as the number of agencies and municipalities that have amended their texts according to customer feedback. However, the commitment language does not set a target number to measure completion or success. The government was to conduct an internal survey in the beginning and end of the implementation period, assessing the progress of each activity. The IRM was unable to find any evidence that the survey had been completed, making it difficult to establish a baseline for comparison.

Milestones 1.1, 1.2, 1.3, and 1.4:

During the previous action plan period, the government launched a clear language campaign in the civil service, which ran from 13 October 2014 to 31 December 2015.[4] The Institute for the Languages of Finland (Kotus) led the initiative with assistance from the OGP team in the Ministry of Finance.[5] It was carried forward as the basis for this commitment in the current action plan. In October 2015, the government held a "Clear Language Day" event, and the agency that most improved its communication was awarded a prize. The campaign included six pilot projects that promoted clear language.[6] The pilot projects were carried out in the Ministry of Transport, the Finnish Transport Safety Agency, the Finnish Tax Administration, Kela's Youth Disability Allowance Texts, the City of Tampere, and the City of Vaasa. Representatives from Kotus and participating cities reported that the pilot projects have encouraged changes in plain language publishing practices, and the projects are largely complete.[7] It is necessary to note that additionally, training and awareness raising for clear language publishing is substantially completed, however, the number of improved materials produced remains relatively small in comparison to the large number of government documents available to citizens.

The government also published a list of plain language materials produced in 2015.[8] This list includes a total of 20 documents produced by 20 separate government ministries and agencies. The institutions updated these documents to improve clarity and accessibility, and the documents contained important information for citizens, such as information on parliamentary elections from the Ministry of Justice, health-related information from a variety of agencies, and pension information and simplified benefits application forms from the National Pension Office/Kela.

A representative of Selkokeskus (the National Center for Plain Language) saw this effort as a good start but not reaching far enough because it represents a small fraction of all the materials and services provided by the government.[9] To best change government practice, plain language versions of materials should be an automatic requirement for documents produced in the three administrative languages (Finnish, Swedish, and English).

In May 2016, the Prime Minister's Office published a clear language guide for civil servants in government agencies and municipalities. Topics include defining clear language, removing jargon from government documents, and providing guidance for official communication.[10] The guide stresses the importance of clearly communicating government rules, benefits, and procedures to improve intergovernmental cooperation and citizen-government interaction. The government also prioritized increasing data visualizations. The Civil Servants Network and the Ministry of Education and Culture launched a "budget belongs to all" hackathon in October 2015[11] to create a visualization for government budget data. On its website, the Ministry of Finance posted an interactive visual representation of the state budget, intended to help citizens better understand yearly spending.[12]

According to a government representative, creating data visualizations has been a main focus of the Civil Servants Networks. The Prime Minister's Office hired an in-house data visualization expert, and recently partnered with, Lucify, a start-up company,[13] to produce interactive visualizations of migration patterns and asylum seekers. According to an Open Knowledge representative, such initiative indicates the growing priority for creating interactive visual data representations.[14]

Milestone 1.5:

At the midterm, preparatory works to implement the European Parliament Accessibility Directive were underway. According to interviews with government officials, Finland is preparing to make all public-sector organizations' websites user friendly and compatible with assistive devices. Such initiatives include improving website accessibility for the disabled by adding text-to-speech features and text zooming. The government's self-assessment report states that there will be a four-year transition period and more public-sector bodies will be added, including schools. The government will work with private companies to develop user interfaces, where citizens can select interactive, role-based services.

Milestone 1.6:

The National Architecture for Digital Services Project aims to reform the government's digital services, making e-government resources easier to find and use online. Part of the project includes replacing the outdated Suomi.fi. digital services platform with an improved version that will allow citizens, private companies, and government officials to log into personal profiles and online services all from one platform.[15] The new version is available in beta stage and is expected to be fully operational in 2017.[16] This could improve e-government but is of unclear relevance to OGP values.

Early Results

Implementation of this commitment has made some positive improvements related to access to information. During implementation of the previous action plan, the Kotus clear language campaign successfully carried out pilot projects that improved the clarity of information on government services and procedures. Many individual civil servants, as well as Kotus and some government agencies, ordered more trainings as a result and made changes inspired by the campaign that have carried forward to the current commitment cycle. [17] However, as a representative from Kotus stated,[18] the campaign took several small steps to the right direction. She acknowledged that simplifying official language is a major issue and going forward more time and resources will be required to continue improvements on a larger scale. A representative from Open Knowledge Finland and an open government expert from the University of Helsinki indicated that they have not seen any major changes in official language as a result of the commitment but acknowledged that this would be difficult to observe and measure.

According to one representative from Selkokeskus (the National Center for Plain Language),[19] the plain language documents and visualizations produced so far have been helpful for improving access to information for more than 500,000 elderly people, disabled persons, and immigrants, individuals who often have barriers to accessing and understanding government resources. However, a limited amount of user-friendly material is available, and these groups need straightforward information to interact with the government and use services independently. In order to have a significant effect, the commitment needs to be fully implemented across the government.

Next Steps

Making government information useful and clear for citizens is essential for open government. Public institutions need to create more data visualizations in areas of high priority for citizens, similar to the interactive budget graphic produced by the Ministry of Finance. To determine high priority areas, the government could create more engagement opportunities for CSOs and citizens to provide feedback and should administer the delayed government assessment survey.

If this commitment is carried over to the next action plan, the IRM suggests creating clear targets for improvement. The government needs to specify the type and amount of information that each government sector should provide in plain language. The agencies participating should also be clearly listed, along with measurable benchmarks to monitor progress toward completion. In order to establish a baseline, the government should conduct a user survey prior to the commitment period, and publish the results. In addition, the government could establish consultation opportunities and a feedback mechanism for the duration of the implementation period, so citizens and CSOs are able to identify confusing information and recommend improvements.

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[1] http://www.sanakirja.org/search.php?id=1373379&l2=17.
[2] This is described in the Ministry of Culture and Education's Good Official Language Guidelines: http://www.minedu.fi/export/sites/default/OPM/Julkaisut/2014/liitteet/tr02.pdf?lang=fi.
[3] http://alueuudistus.fi/en/frontpage.
[4] The Official Language Campaign: http://www.kotus.fi/kielitieto/virkakieli/yleista_virkakielesta/virkakielikampanja_2014_2015.
[5] http://www.kotus.fi/kielitieto/virkakieli/yleista_virkakielesta/virkakielikampanja_2014_2015.
[6] http://www.kotus.fi/kielitieto/virkakieli/yleista_virkakielesta/virkakielikampanja_2014_2015.
[7] Interview with Tiina Salonen, head of communications for the City of Vantaa, September 2015. Interview with Elina Uotila, head of development for the City of Trafi, September 2015.
[8] http://vm.fi/documents/10623/1193298/Avoimen+hallinto+tilannekatsaus+042016.pdf/9737094d-b1aa-4577-a61c-c66f57520bcd.
[9] Interview, 23 November 2016.
[10] http://verkkojulkaisut.vm.fi/zine/92/article-13097.
[11] http://kaikkienbudjetti.fi/.
[12] http://tutkibudjettia.fi/.
[13] Example of the interactive migration-related visualizations: http://www.lucify.com/.
[14] Interview with a representative from Open Knowledge Finland, 28 September 2016.
[15] http://vm.fi/en/national-architecture-for-digital-services.
[16] https://beta.suomi.fi/kansalaiselle.
[17] Interview with Tiina Salonen. Interview with Elina Uotila.
[18] Interview, 23 November 2016.
[19] Interview, 23 November 2016.

Commitment 2. Government as an Enabler

Commitment Text:
Status quo or problem/issue to be addressed:

Opening the government data
The opening of government data has started. Many important databases have been opened. The financing of the opening of government data is now part of the frame –budgeting process of the government. The ministries propose yearly, which databases within their administrative branch should be opened. All the databases cannot be opened at once due to the lack of resources and differences in the maturity of agencies. The databases, which are planned to be opened, have to be prioritized.

A common platform (avoindata.fi) for open data and interoperability services has been launched by the Open Data Program, which is steered by Ministry of
Finance. Agencies and municipalities have been given guidance on opening the data. Finland scores fourth in the international Global Open Data Index comparison.
However, the opening of government data is just at the beginning phase.

During the drafting of the Action Plan a need to open several data reserves, which are considered important, was raised. These are: companies' and corporations' data, notifications on forest usage, decisions on use of forest owned by government, environmental impact assessments, public procurement, agencies' plans to
open data and other central data reserves. Some of this data is already open, but they are hard to find from the agencies' web-pages. The accessibility of open data has been enhanced by opening the avoindata.fi – portal, where links and metadata on open data are.

Processes for handling the suggestions of data reserves to be opened will be created within the Open Data Program, which ends in July 2015. The possibilities, limitations and actions needed to open the data reserves, which have been suggested to be opened, need to be studied. The amount of work has to be evaluated and the data reserves have to be prioritized.

Digitalization brings the services close to citizens
The society is rapidly becoming urbanized. The government is reforming services by centralizing and digitizing. Digital services raise productivity; enhance the possibilities of special groups to use services and bring services to places, where other services do not exist anymore. Citizens, including people with special needs, have to be taken into the service planning process to create services, which are easy to use. eDemocracy- services have been developed since the beginning of 21st century. The renewed portal of wide range of eDemocracy –services is partly in a piloting phase.

Prerequisites of volunteer work are supported
Government, municipalities and civil society cooperate and work as partners. Volunteer work is supported by several ministries and municipalities. Processes in different ministries and municipalities are different. There is now co-ordination between ministries. There is a lack of co-ordination also in many municipalities.

Main Objective:
Government enables opportunities for businesses and civil society by opening government data reserves and tearing down obstacles for volunteer work. Participation and use of public services in rural areas is enhanced by digitalizing services.

Milestones:
1. Established procedures to open data sets which are significant to open, efficient, accountable and transparent administration. Possibilities to open these data sets are investigated and priorities order

is set. Results are published and follow-up is organized.

2. Citizens have a possibility to view their personal records kept by the authorities through one single service. Indicator: Number of state agencies and municipalities joined to this service.

3. Drafted proposal of how to support to preconditions of voluntary work should be coordinated within the government.

4. Drafted proposals of removing the barriers of voluntary work and analysis of their impact.

5. Together with CSOs and municipalities practices to improve possibilities of e-participation of people with special needs and of people living in rural areas are created.

6. Citizens have access to e-services also in rural areas.

7. e-participation tools (demokratia.fi, kansalaisaloite.fi, kuntalaisaloite.fi, lausuntopalvelu.fi, nuortenideat.fi, otakantaa.fi) are actively used by the public sector and the civil society. Indicator: Number of users.

8. CSOs and citizens organizing voluntary work have an easy access to information they need for this.

9. Democracy recognition is given to two civil servants (one from the state administration and one from the municipal sector) for their activities in enhancing open government.

Responsible institution(s): Ministries of Finance, Justice, and Communication

Supporting institution(s): Ministries, agencies, municipalities, Association of local and regional authorities, CSOs, Advisory board on civil society policy

Start date: 1.7.2015 ..... **End date:** 30.6.2017

Commitment Overview	Specificity				OGP value relevance				Potential impact				On time	Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative		Not started	Limited	Substantial	Complete
Overall		✔			✔	✔		✔		✔			Yes			✔	
2.1. Procedures to open datasets		✔			✔					✔			✔			✔	
2.2. Personal records service		✔			✔			✔		✔			✔			✔	
2.3. Proposal for coordinating			✔		Unclear					✔			✔				✔

support for voluntary work															
2.4. Proposals for removing barriers of voluntary work			✔		Unclear					✔			✔				✔
2.5. E-participation practices		✔				✔				✔			✘	✔			
2.6. Access to e-services in rural areas		✔			Unclear					✔			Un-clear	Unclear			
2.7. E-participation tools used		✔				✔				✔			✔			✔	
2.8. Access to information for voluntary work	✔				✔					✔			✔		✔		
2.9. Democracy recognition			✔		Unclear				✔				✔				✔

Context and Objectives

In general, this commitment aims to improve citizens' access to information and provide opportunities for citizens to participate in decision making through e-participation tools. It includes three distinctive sets of milestones which address different thematic problems: open data milestones (2.1 and 2.2) carried over from the previous action plan; milestones to enhance government support for voluntary work (2.3, 2.4, and 2.8); and milestones related to improving access to services and enhancing civic participation in rural areas through e-services (2.5, 2.6, and 2.7). The commitment also includes a democracy recognition milestone (2.9), which is unrelated to the others and of unclear relevance to OGP.

Open data:
Access to government data is a cornerstone of open government. Finland is ranked highly in different open data indexes,[1] but there are significant differences between ministries, agencies, and municipalities in open data practices. Activities under the open data theme serve to improve the ease of citizens' access to government-held information.

Voluntary work information:
Four out of five Finnish citizens are interested in voluntary work, and almost half of the population takes part in some volunteer activity.[2] However, coordination between government agencies and regulatory bodies varies, and information on voluntary work can be difficult to access. Civil society organizations promoted the inclusion of milestones to improve access to information about voluntary work regulations. Promoting and creating simple processes for engaging in volunteer work is laudable but of unclear relevance to OGP values.

Participation and e-services:
Increasingly, service provision and decision making is concentrated in a few major urban centers. For this reason, groups such as people with special needs and citizens (especially the elderly) in rural areas often lack opportunities to participate in government and access e-services. The third thematic area of this commitment seeks to improve e-participation

opportunities in cooperation with CSOs and municipalities, through expanding existing e-participation tools.

Completion

Milestones 2.1 and 2.2 (open data):

2.1. The government published a guide for opening data as a part of the Ministry of Finance's Open Data Programme, drawing on international best practices. In addition, the government has been steadily opening datasets and publishing them in the newly created avoindata.fi, an online service platform.[3] Data published during the commitment period includes occupational health and safety information, information on candidates in the 2015 parliamentary elections, yearly revenue and expenditure for Finnish cities, environmental data from the National Satellite Centre, and data from various industries.[4] At the midterm, the government had not determined priority datasets for future publication.

2.2. The Ministry of Finance led an initiative through the National Architecture of Digital Services Project (KAPA) to improve citizens' ability to quickly and easily access personal data recorded by the government,[5] An updated version of the Suomi.fi (Finland.fi) web portal is underway, and through it citizens will be able to access e-services and public records in one location.[6] As of the June 2016, citizens can use the beta version of the site to access personal vehicle registration data[7] and estate data.[8] The service will be fully functional in 2017. According to the government self-assessment report, agencies and municipalities are being encouraged to add data reserves that include personal data to the Suomi.fi service.

Milestones 2.3, 2.4, and 2.8 (voluntary work information):

2.3. During implementation, the Ministry of Justice was named as the coordinating ministry regarding voluntary work. Additionally, the Democracy Network, comprised of representatives from all ministries, is overseeing implementation of activities to update voluntary work information.[9] The Ministry of Justice has created a website where guidance and advice has been gathered for groups organizing voluntary work and for people interested in participating in voluntary work.[10] These pages will later be transferred to the Suomi.fi web service.

2.4. A working group consisting of civil servants as well as CSO representatives completed a report on the barriers to voluntary work. Minister of Local Government and Local Reforms Anu Vehviläinen received it on 14 October 2015, and the report is publicly available online.[11] A CSO representative from the Citizen Forum[12] also said that the implementation process is advancing well but that further commitments are needed to recognize and remove new barriers to voluntary work.

2.8. The Ministry of Justice has opened a website that compiles information and guidance for organizations as well as for individuals engaging in volunteer work.[13] The website will be part of the Suomi.fi portal once it is fully operational later in 2017. According to the Citizen Forum representative, the current site is still a work in progress and lacks some relevant information.[14] In addition, officials have yet to development guidelines. The CSO representative expressed hopes that these problems will be solved once the Suomi.fi portal is officially launched.

Milestones 2.5, 2.6, and 2.7 (participation and e-services):

2.5. At the midterm, activities to improve access to e-participation tools for citizens in rural areas and for special needs groups have not started. According to the government self-assessment report, the planning is delayed and should start in fall 2016.

2.6. In order to improve access to e-services in remote areas of the country, the government is continuing a "Broadband for All 2015" initiative under this commitment. Plans to continue increasing broadband speeds and connecting the country by increasing fiber build-out are underway; however, such activities are not directly relevant to OGP values.

2.7. The Ministry of Justice has launched several campaigns to raise awareness about the different e-participation services. The self-assessment report states that there have been several trainings for ministries and municipalities and that services have been promoted at events for both civil servants and the general public. In late 2015, the government conducted a national marketing campaign to publicize the e-participation portal for youth: Nuortenideat.fi.[15] The marketing campaign advertised e-services on multiple channels, including social media, television campaigns, newsletters, and ads in magazines.[16] In 2016 e-participation efforts concentrated on promoting Lausuntopalvelu.fi (Consultation.fi) and Otakantaa.fi (Share your views with us). These sites allow citizens to provide input and feedback on government programs. According to the government self-assessment report, all ministries will receive information about this service as part of their training on consultation guidelines for drafting laws. According to a CSO representative interviewed, the campaigns have been somewhat successful. The government has provided the number of website visitors, consultations carried out, and projects initiated by e-participation tools.

2.9. A democracy recognition award winner was selected for the second time in a Democracy Day event on 13 October 2015 and is complete.

Early results (if any)

According to a government representative, Avointieto.fi has published open datasets that have been used by journalists. Although of unclear relevance to OGP values, the government drafted proposals to improve the volunteer process (milestones 2.3 and 2.4). A CSO representative saw these as important steps in fostering cooperation between civil society and civil servants committed to the process.

The use of e-participation tools has increased. The government self-assessment viewed the 2015 online campaigns promoting the e-participation services in Demokratia.fi as a success. The campaign reached 700,696 individual users through Facebook, YouTube, Twitter, and search engine marketing, far exceeding the goal of 415,000. Citizen participation through online tools also trended upwards from January 2016 to a peak in September 2016. A representative of Open Knowledge Finland stated that the services have been well received by civil society and the public.[17] This CSO also cited that the government has made online participation tools more useful for citizens. In particular, Kansalaisaloite.fi,[18] a service for citizens to propose new legislation, has seen increasing use since its inception in 2012. The Lausuntopalvelu.fi (Leave your comment) online service allowing public commenting on new laws, policies, and guidelines, has been updated so that citizens can provide paragraph-by-paragraph critiques of uploaded documents.[19] According to the CSO representative,[20] this commitment could result in a significant change in government practice regarding citizen participation in drafting legislation, and valuable progress has been made. For details on site traffic and use, see the following table:

Democracy.fi number of users	
Kansalaisaloite.fi (Citizen initiative)	Almost 500 citizen initiatives have been posted (March 2016), and webpage visits are around 2.5 million a year, averaging 200,000 per month.
Kuntalaisaloite.fi (Municipal resident initiative)	Two hundred municipalities have joined the service (November 2015), and there are on average 20,000 website visits per month. Around 1,100 initiatives have been sent to municipalities through this service (March 2016).
Otakantaa.fi (Share Your view with us—discussion forum)	More than 300 projects have been published on the website, and there are on average 10,000 to 15,000 site visits per year.
Lausuntopalvelu.fi (Consultation portal)	More than 500 organizations have started to use this service and more than 1,000 individuals. About 30 consultation requests have been published and 800 statements (March 2016). Site visits are around 3,000 per month.
Nuortenideat.fi (Ideas from young people)	The site began in March 2015, and 68 organizations have started to use it. There are now 700 registered users in this service and around 400 (March 2016) ideas and requests/discussions have been published. There are 4,000 site visits per month.

From the government's self-assessment report

Next steps

The commitment includes themes that could be taken forward to the next action plan, but it requires more specific, measurable activities. IRM researcher recommends dividing the milestone themes (improving e-participation, publishing volunteer work regulations, and increasing data access) into three distinct commitments, creating clear goals and specifying measurable activities to reach them.

Consultations with CSOs and citizen surveys should be used to determine additional priority datasets to publish. The biggest problem, according to a CSO representative from Open Knowledge Finland[21] and a government representative from the Ministry of Finance's OGP team,[22] is that the "build it and they will come" approach is not working and the government needs to actively publicize and promote its open data services. When the Suomi.fi (Finland.fi) portal is officially launched, government agencies and municipalities should be actively encouraged to share their data on the service.

In order to improve government practice in promoting civic participation, activities to increase online engagement in governance should include a clear mechanism for rural and special needs citizens to provide feedback on governance proposals. During the remaining commitment period and in the new action plan, increased efforts should be made to provide a means of capturing and including input from these groups.

[1] Fifth in Global Open Data Index 2015, 11th in Open Data Barometer: http://index.okfn.org/place/finland/ and http://opendatabarometer.org/data-explorer/?_year=2015&indicator=ODB&lang=en&open=FIN.
[2] http://www.kansalaisareena.fi/.
[3] https://www.avoindata.fi/en.
[4] Open data and interoperability tools: https://www.avoindata.fi/en.
[5] http://vm.fi/en/national-architecture-for-digital-services.
[6] Suomi-fi is a website that aims to collect different government services and information on one, centralized site for easy access for citizens. It's still in the test phase; the full version should be launched in 2017: http://www.suomi.fi/suomifi/english/index.html.
[7] Vehicle registration and tax information: https://asiointi.trafi.fi/en/web/asiointi/organisaatiot/tieliikenne/ajoneuvotietopalvelut.
[8] Finland Midterm Report Self-Assessment, http://www.opengovpartnership.org/country/finland/assessment.
[9] Ibid.
[10] http://www.demokratia.fi/tietotori/vapaaehtoistyo/.
[11] http://vm.fi/artikkeli/-/asset_publisher/vapaaehtoistyo-talkootyo-naapuriapu-kaikki-kay.
[12] Interview, 29 September 2016.
[13] http://www.demokratia.fi/tietotori/vapaaehtoistyo/.
[14] Interview, 29 September 2016.
[15] Finland Midterm Report Self-Assessment, http://www.opengovpartnership.org/country/finland/assessment.
[16] Demokratia.fi is an online platform that collects different e-participation services and includes information on events and campaigns: http://www.demokratia.fi/nyt/.
[17] Interview with member of Open Knowledge Finland, 18 November 2016.
[18] https://www.kansalaisaloite.fi/fi.
[19] Interview with member of Open Knowledge Finland.
[20] Ibid.
[21] Ibid.
[22] Interview, 20 September 2016.

Commitment 3. Open Procedures

Commitment Text:
Status quo or problem/issue to be addressed:

Visibility of government projects
The aim of the Act on the Openness of Government Activities is to ensure openness of government activities and give the citizens and other actors of the society a possibility to monitor the use of public authority and public funds, to formulate their own opinions and to influence the use of power and to safeguard their own rights and needs. Digitalization has increased possibilities to enhance openness. The expectations of the citizens have however increased faster than the government practices have advanced.

Since 1999 information on government projects has been available via Government Project Registry (HARE). The registry is now being renewed. The use of this new registry by the ministries needs to be assured and the knowledge of it increased among the citizens and the media.

Updating the instructions for legislative drafting
Ministry of Justice has given instructions for legislative drafting. Instructions need to be updated to meet the needs of the changing operational environment.

The needs of children and the youth as well as people with special needs are taken into account as well as the obligations of the new Municipal Law. The established open government networks can collect needs for additional instructions and handbooks. The open government network of state government and the open government network of municipalities are also ways to implement the instruction to the administrations.

More web castings in government
Web castings of events organized by government are provided. The wider use of web castings is hindered e.g. by additional cost of organizing them. Better and more cost-effective ways of providing web castings are needed and they need to be more extensively implemented.

Enhancing openness within the government
In order to be open to the citizens the government needs to be internally open. Sharing information and working together within the government is essential for the government to be able to handle horizontal wicked problems.

The need for a lobbying register is assessed
According to the Corruption Index of the Transparency International, Finland is the third least corrupted country among the 175 countries evaluated. The first two places are held by Denmark and New-Zealand. Despite this good rating Finnish government needs to continuously work to remain and improve the existing level of trust.

Possible creation of a lobbying register has been addressed by The Committee on Ethics of State Civil Servants in a report published in 2014 (Report in Finnish: Valtion virkamieseettisen toimikunnan raportti VM 3/2014).

Milestones:
1. Renewed government project registry (HARE) has been opened and it is used by all the ministries. Indicator: % of all government projects published in HARE. Survey in 2016 and 2017.

2. HARE is well known by citizens and media. Indicator: Number of users.1

3. Instructions for legislative drafting have been updated.

4. Number of interactive web castings in government is increasing. Indicator: Number of agencies providing web castings. Survey on 2015 and 2017.

5 Government is active in social media.2

6. Report on creation of a lobbying register and the possibility of providing it as open data has been published and conclusions of possible actions decided.

7. Open government is presented in the annual International anticorruption day event organized by the Ministry of Justice and the Transparency International Finland.

8. Open government principles are also applied to horizontal work within the government. Indicator: Annual personnel survey of the government (VM-Baro)

Responsible institution(s): Ministry of Justice, Ministry of Finance.

Supporting institution(s): State agencies, ministries, municipalities, civil society organisations, and employer and employee organisations.

Start date: 1.07. 2015..... **End date:** 30.06.2017

Commitment Overview	Specificity				OGP value relevance				Potential impact				On time	Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative		Not started	Limited	Substantial	Complete
3. Overall			✔		✔	✔		✔		✔			Yes		✔		
3.1. Project register opened and used			✔		✔					✔			✔		✔		
3.2. HARE is well known		✔			Unclear					✔			✔		✔		
3.3. Updating instructions for legislative drafting		✔			Unclear					✔			✔				✔
3.4 and 3.5. Increasing webcasts and social media use		✔			✔			✔		✔			✔		✔		
3.6. Assessing need for lobbying register			✔		✔					✔			✘	✔			
3.7 Open government		✔			Unclear				✔				✔				✔

presented in International Anti-Corruption Day															
3.8 Open government principles applied internally		✔			Unclear		✔			✘		✔			

Context and Objectives

This commitment aims to increase the openness of government procedures—a main theme carried over from Finland's previous action plan. The Organisation for Economic Co-operation and Development (OECD) reports that confidence in government has declined between 2007 and 2014 in Finland.[3] Increasing the transparency of government operations and procedures could improve the public's trust in the government and encourage greater citizen participation in decision making. While Finland ranks in the top 10 most open governments globally,[4] CSOs highlighted trust in government as an important issue in an online IRM questionnaire.

The commitment itself has eight milestones,[5] which address different issues related to open government practice. These include opening information about publicly funded government projects, updating consultation guidelines for drafting laws, and reviewing lobbying procedures and anti-corruption reforms.

Completion

Project register:
3.1. The joint project register (HARE) for ministries and Parliament will be replaced by an updated website called "Hankeikkuna." The goal of the register is to open public project information to citizens, media, and CSOs. The register will include regularly updated information on the following: implementation of government programs, laws being drafted, proposed reforms, and development projects. It will also provide information on appointments to government institutions and working groups, strategies, and reports to Parliament. The register will be published internally to civil servants in October 2016 and to the general public in March 2017.[6]

3.2. Ministries will provide training and guidance activities to enable civil servants to use the new project register. The new register will also be publicized online through government webpages and at public events. According to the self-assessment report, this communication has already begun and is linked to OGP activities. Members of the Civil Servant Network discussed the register in a meeting on 11 May 2016, and the slides are available online.[7] However, according to a representative of the Ministry of Finance,[8] implementation has been delayed due to a change in leadership. The Prime Minister's Office is now responsible for implementation through the remainder of the commitment period. The register is under development within the civil service, with a public launch planned in 2017. As written, this milestone represented an internal government process of unclear relevance to OGP values.

Legislative procedures:

3.3. The government approved updated instructions for drafting legislation on 4 February 2016 and published guidelines for their use.[9] In the revised consultation process, civil society stakeholders and citizens have opportunities to share their views on draft laws. The new guidelines have replaced the government's decision-in-principle policy from 2010. According to the government self-assessment, the e-participation website, Lausuntopalvelu.fi, will be a platform for public consultation on policy making, and all consultations will take place online once government ministries have joined the document-handling system. The preparatory steps seem to be progressing on schedule but are of unclear relevance to OGP values.

3.4 and 3.5. The government intends to increase the use of webcasts and social media to provide citizens with information. In May 2016, the use of social media was a theme in "morning coffee sessions" for the highest-level leaders. The Civil Servants Network will review best practices for using online tools and will publish experience cards highlighting the key findings in the fall of 2016.

According to a member of the Ministry of Finance's OGP team,[10] the government has not made this activity a priority. However, plans to increase webcasts are on schedule, and internal discussions are underway. In addition, the state's Civil Servant Ethics Commission has published a statement providing recommendations and guidelines for social media use by civil servants and the government administration.[11]

Lobbying register and anti-corruption:
3.6. The government is considering creating a lobbying register and providing the information in an open data format. However, no assessments or active reviews have taken place at the midterm. According to an interviewed official, the government has not been able to decide on the right unit to carry out the work, which has delayed the process.

3.7 and 3.8. The government OGP representative gave a presentation at the International Anti-Corruption Day event on 9 December 2015. In addition, the government self-assessment and interviewed officials stated that increasing open government practices across ministries and agencies is a priority. However, these activities are of unclear value relevance to OGP.

Early results (if any)

There is little early evidence that the commitment has changed government practice as many activities in this commitment are in preparatory phases. Based on the limited level of completion and the inclusion of activities that lack specific relevance to OGP, the government has made limited progress on opening government after the first year of implementation. However, some stakeholders see the project register (3.1) as an improvement to access to information, and it could have a positive effect on opening government information once it is implemented. Milestone 3.3, related to updating instructions for legislative drafting, was completed, but it lacked a public-facing element and relevance to OGP values. One open government academic from the University of Helsinki[12] said that updating the guidelines for drafting legislation is an important goal. However, the interviewee felt that the government should focus more on ensuring useful participation and achieving realistic goals using available resources for citizens to participate in legislative processes.

Next steps

The IRM researcher recommends completing the activities as planned and suggests organizing workshops with stakeholders to build on milestone activities and enforce

implementation. Eight stakeholders responded to an IRM online questionnaire, and all considered both the commitment and its activities important. However, they believed that the government should apply the consultation process to all policymaking, especially in high-impact cases. The government could better include stakeholders early in the process, ensuring adequate time and ability to influence draft laws and outcomes.[13]

A representative from academia thought the action plan was somewhat unclear on how to improve citizen participation and provide more accessible information on government activities.[14] He suggested that the government further develop the project registry (3.1) to improve indicators. Instead of measuring how many projects are included, the registry would be more useful if it included information on how recent the projects are, the levels of completion, and how to retrieve more information on outcomes. To be most useful in opening government, the registry should be more than an archive and should enable real-time monitoring to improve the transparency of government works. In addition, the legislative drafting milestone (3.3) should also include clear steps for incorporating the results from public consultations in the drafting process, for example, by use data-mining procedures.

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[1] This milestone is an indicator and therefore is not assessed as an individual activity in the table below.
[2] Milestone 3.5 "government is active in social media" is listed only in the Finnish language version of Finland's national action plan. According to the interviewed government representative, this was not listed in the English version by accident.
[3] Organisation for Economic Co-operation and Development (OECD), "Government at a Glance 2015," http://www.oecd-ilibrary.org/docserver/download/4215081e.pdf?expires=1475222878&id=id&accname=guest.
[4] World Justice Project Open Government Index, 2015 Report, http://worldjusticeproject.org/sites/default/files/ogi_2015.pdf.
[5] The commitment milestones are fully described in the national action plan: http://www.opengovpartnership.org/sites/default/files/OGP_Action_Plan_Finland-2015_2017.pdf.
[6] Finland Midterm Report Self-Assessment, http://www.opengovpartnership.org/country/finland/assessment.
[7] http://vm.fi/documents/10623/1194961/Valtioneuvoston+yhteinen+Hankeikkuna+-+P%C3%A4ivi+Nurminen+VNK.pdf/3bed6fad-5846-48a9-b3c5-24371d76989c.
[8] Interview with the Ministry of Finance point of contact, 10 January 2017.
[9] Link to new instructions (in Finnish/Swedish only): http://kuulemisopas.finlex.fi/ohje/kuulemisohje/.
[10] Interview, September 2016.
[11] Link to statement (in Finnish): http://vm.fi/documents/10623/2033991/Valtion+virkamieseettisen+valiokunnan+suositus/f6b3ae92-17ec-4d82-88f6-488ca1692abb.
[12] Interview, 21 November 2016.
[13] Interviews with Finnish Youth Cooperation–Allianssi, August 2016, and Transparency International Finland, August 2016.
[14] Interview with an academic from the University of Helsinki, 21 November 2016.

Commitment 4. Engagement of Children, the Youth, and the Elderly

Commitment Text:
Status quo or problem or problem/issue to be addressed

Participation opportunities of children and the youth have been systematically enhanced in municipalities and in CSOs. The new Municipal Law requires all the municipalities to establish Youth Councils or equivalent groups as well as Councils on Disability. Older people's councils have been mandatory since 2013.At the moment approx. 80 % of municipalities have a Youth Councils or equivalent groups. Approximately 150 municipalities have Councils on Disability. Both of these councils will be mandatory from 1.6.2017. In state government and especially in law drafting the engagement of children and the youth has been less advanced.

During the first Finnish Open Government Action Plan a workshop for young people was organized where the laws in preparation were discussed and information was gathered on how and in which matters young people should be engaged in the drafting process.

Especially in the meetings and workshops with the civil society, together with the children and youth engagement the inclusion of the elderly has been highlighted.
They are also a group often not included in the drafting processes.

Different age groups should however not been considered as homogeneous groups based on just age. Specific attention needs to be paid to people with disabilities, or people lacking the often-needed language skills or cultural knowledge. This applies also to children and young people.

Main Objective
Enhancing the engagement of children, youth and elderly people in the processes where the decisions are prepared and in co-design and co-production of services.

Milestones
1. In preparation of a new the Youth Act and the Child and Youth Policy Programme to be published in 2015, the engagement of children and the youth in the state government will be enhanced (including law drafting). Digitalisation is utilized.

2. Advice to the staff of state government and the municipalities will be organized on how to engage different age groups. This will be done in co-operation with the CSOs. Indicator: Number of trainings organized and number of participants in these trainings.

3. Based on the Action plan of the upcoming new Government, main initiatives will be selected where different methods of engaging children, the youth and the elderly people are experimented.

4. A joint participation camp for the elderly, the youth and children is organized. Also civil servants from state government and municipalities will be present.

5. In co-operation with Youth network a study on engagement of children and the youth will be made.

Responsible institution: Ministry of Education and Culture

Supporting institution(s): Ministry of Social Affairs and Health; other ministries, state agencies, and municipalities; child and youth organizations; organizations for the elderly

Start date: 1.7.2015 ..... **End date:** 30.6.2017

Commitment Overview	Specificity				OGP value relevance				Potential impact				On time	Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative		Not started	Limited	Substantial	Complete
4. Overall		✔				✔				✔			Yes			✔	
4.1. Engaging children and youth in the state government		✔				✔				✔			✔		✔		
4.2. Advice on engaging different age groups		✔				✔				✔			✔			✔	
4.3. Experimen-tation of engagement methods		✔				✔				✔			✔				✔
4.4. Participation camp		✔				✔				✔			✔		✔		
4.5. Engagement study			✔			✔				✔			✔				✔

Context and Objectives

The main objective of the commitment is to improve state government engagement with children, youth, and elderly people, involving them in preparing decisions and co-designing services. A Ministry of Finance OGP-team member[1] explained that the commitment aims to balance representation of children, youth, and elderly people in policy decision making by introducing elements of direct democracy for specific age groups and citizens with low participation rates. At present, a municipal law requires all municipalities to establish youth councils or equivalent groups, as well as councils on disability. This commitment aims to bring such policymaking practice to the national level.

The commitment includes five milestone activities that focus on increasing elderly inclusion and laying the groundwork for passing a new Youth Act and Child and Youth Policy. Planned actions include training civil servants on engaging different age groups, experimenting with different engagement strategies, hosting a participation camp for youth and elderly groups, and conducting a study in partnership with the Advisory Council for Youth Affairs.

Completion

4.1. In June 2015, the Youth Advisory Board of Directors proposed a new Youth Act of 2016 to replace the existing one, with plans for it to enter into force in early 2017. The new Youth Act[2] aimed to overhaul the youth work system, and therefore required substantial coordination between ministries and agencies. However, at the midterm, passage of the new Youth Act remained delayed, subsequently postponing a regularly scheduled Child and Youth Policy update. The government decided in December 2015 to extend the existing Child and Youth Policy program until a new Youth Act is passed.

According to a public official from the Ministry of Finance's OGP team,[3] the government began preparatory work for the new Youth Act in April 2014. Children and youth were engaged online and offline in preparing the draft act.[4] In addition, the minister in charge of preparing the Child and Youth Policy conducted a roundtable discussion with relevant CSOs in order to take advantage of online engagement methods. However, due to the previously mentioned delay in implementing the new Youth Act,[5] this commitment is on track, but completion remains limited.

4.2. Civil servants and researchers have jointly created and published a number of short guidelines to aid in public consultation with different age groups.[6] The Ministry of Finance, the Mannerheim League for Child Welfare, the Children's Commissioner's Office, the Ministry of Education, and the Ministry of Culture jointly organized a seminar on the rights of children on 16 November 2015. The event covered the rights of children, consultation practices, and child impact assessments.[7] Speakers from the Ombudsman's Office, the Ministry of Education, and child welfare organizations presented research and discussed practices for including children and youth in open government agendas.[8]

4.3. According to the government self-assessment report, five different initiatives in the government's action plan experiment with engagement methods. These include (1) a program to address child and family services, (2) digitization of public services, (3) the Municipality of the Future, (4) experimenting with a digital municipality, and (5) home care for older people.

Several engagement activities took place during the first year of implementation. Two events were held to engage elderly citizens in decision making:

1) A "Days for Boards for the Elderly" event on 6 April 2016 organized by the Ministry of the Environment, the Ministry of Finance, and the Ministry of Social Affairs and Health[9] and
2) A workshop on digital services and digital participation in decision making for elderly people on 31 May 2016.[10]

A civil society representative from the Union for Senior Services (Valli ry)[11] said that these events were well known and participatory in nature. Elderly councils partnered with the Ministry of Social and Health Affairs and the Ministry of Environment to organize the "Days for Boards for the Elderly" event. Participants discussed issues of living and home care. In total, 87 members of elderly councils from around Finland participated.[12]

Members of elderly councils from local municipalities participated in an online brainstorming event to discuss digital services for the elderly. According to the government self-assessment report, 1,340 seniors participated in the online event, and the results led to the creation of the "Workshop on Participation in Decision Making" for elderly activists. The workshop was organized by three citizen organizations,[13] as well as civil servants, and 46 elderly participants attended.[14]

During the implementation period, cities in Finland, including Pori, Kuopio, and Helsinki, engaged youth through the e-participation site Nuortenideat.fi and through school programs. The self-assessment report states that in October 2016 a youth forum was organized in partnership with the OECD's Public Governance Ministry. Leading up to the forum, young people from different countries met with ministers and discussed the results of other national youth forums at the House of the Estates in Helsinki. The Open Government Project in Finland led the initiative to organize the youth forum and to discuss outcomes from international youth forums.

4.4. The government self-assessment states that potential partners for organizing a participation camp have been identified, though this information has not been made public. According to the government, preparation for the camp will begin in the autumn of 2016.

4.5. In the self-assessment report, the government states that it conducted a joint study with the Advisory Council for Youth Affairs prior to the start of the commitment implementation period. The campaign to consult children and youth was called Mä oon asiantuntija! (I'm an expert!) and comprised online consultations and events in eight cities. This activity was included in the action plan because the government and CSOs working on youth issues were interested in using the results from the study to inform policy. The State Youth Council, a government-appointed group made up of civil servants and CSOs, wrote a three-page report[15] about the outcomes of the consultation process.[16] Based on its findings, the OGP team created consultation guidelines for engaging children and youth.[17]

Early results (if any)

This commitment is primarily focused on testing, studying, and developing practices for increasing engagement. Many of the activities are preparatory, and therefore their effect on opening government is minor, although studies and experimentation with different outreach methods could increase civic participation in the future.

Seven out of eight interviewed CSOs considered both this commitment's theme and the activities important. The preparation of the Youth Act (milestone 4.1) received praise from both members of Parliament and other stakeholders. Furthermore, engaging children and youth in the preparation of a law that addresses them directly is an important step, even though the formulation of the milestone text does not specify how input will be included.

The government self-assessment report cites further activities conducted, in addition to those included in the commitment. For example, they organized the Youth Dialogue Event in October 2015,[18] the Elderly Council Day in April 2014,[19] and a consultation process on engagement and digital service development for the elderly, which included an extensive online consultation and a workshop.[20]

Next steps

The IRM researcher recommends that all the activities be implemented in the remaining commitment period as planned. The government could focus on incorporating the best practices learned from experimenting with various engagement methods (milestones 4.1 and 4.3). The government produced material from studying and seeking advice on engagement methods and strategies (milestone 4.2 and 4.5), and it should further apply findings in trainings (for example, as part of milestone 4.2) and other activities. Additionally, the government should provide participants in government-held events with clear information on how their input will be used to inform policy, and future action plans should indicate how

citizens can participate in sharing their views, along with how those views will be used to inform government decision making.

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[1] Interview, September 2016.
[2] Under the most recent Youth Act of 2006, the Ministry of Education and Culture is responsible for updating the Child and Youth Policy (under Government Proposal to Law (HE111/2016 & Law 5§)) and is supported by the Youth Advisory Board of Directors. The Child and Youth Policy is then approved by the Finnish government every four years. (Ministry of Education and Culture, "Reform of the Youth Act," 29 June 2016, http://www.minedu.fi/OPM/Nuoriso/vireilla_nuoriso/nuorisolaki/.) This policy sets objectives and guidelines for regional state administrative agencies and for youth policy programs in municipalities. Such programs include education, employment, health, active citizenship, social empowerment, housing, and entrepreneurship for all persons under age 29: http://www.minedu.fi/OPM/Nuoriso/nuorisopolitiikka/Kehittxmisohjelma_2012-2015/?lang=en.
[3] Interview, September 2016.
[4] Link to more information about the drafting process (in Finnish): http://www.minedu.fi/OPM/Nuoriso/vireilla_nuoriso/nuorisolaki/.
[5] Link to the decision (in Finnish): http://valtioneuvosto.fi/paatokset/paatos?decisionId=0900908f8049c096.
[6] Link to guideline documents (in Finnish): http://vm.fi/hallinnon-avoimuus/avoin-hallinto/avoimen-hallinnon-tietokortit.
[7] Link to seminar program (in Finnish): http://vm.fi/hallinnon-avoimuus/avoin-hallinto/materiaaleja-ja-taustaa.
[8] Rights of the Child Seminar documents: http://vm.fi/hallinnon-avoimuus/avoin-hallinto/materiaaleja-ja-taustaa. Example of findings presented: http://vm.fi/documents/10623/1194802/Iivonen+Lapsivaikutusten+arviointi+-+avoin+hallinto+16.11.15.pdf/d5c7e600-32d4-470e-aad0-a94327617ae5.
[9] http://www.ym.fi/fi-FI/Asuminen/Ohjelmat_ja_strategiat/Ikaantyneiden_asumisen_kehittamisohjelma/Vanhusneuvostopaiva_642016(38537).
[10] Program, slides, and minutes of discussions available at the open government website: http://vm.fi/hallinnon-avoimuus/avoin-hallinto/materiaaleja-ja-taustaa.
[11] Interview, 10 January 2016.
[12] Finland Midterm Report Self-Assessment, http://www.opengovpartnership.org/country/finland/assessment.
[13] Valli (the Finnish Union for Senior Services), SOSTE (Finnish Federation for Social Affairs and Health), and ENTER ry (ICT association for seniors).
[14] Finland Midterm Report Self-Assessment, http://www.opengovpartnership.org/country/finland/assessment.
[15] Report available at https://tietoanuorista.fi/en/nuora/advisory-council-for-youth-affairs/
[16] https://tietoanuorista.fi/en/.
[17] http://vm.fi/hallinnon-avoimuus/avoin-hallinto/avoimen-hallinnon-tietokortit.

[18] Link to event: https://www.oecd.org/governance/ministerial/youth-dialogue.htm.
[19] Link to event: http://www.ym.fi/fi-FI/Asuminen/Ohjelmat_ja_strategiat/Ikaantyneiden_asumisen_kehittamisohjelma/Vanhusneuvostopaiva_642016(38537).
[20] Link to results of the process: http://vm.fi/documents/10623/1193298/Monessa+mukana+kaiken+ik%C3%A4isen%C3%A4+%E2%80%93+aivoriihen+1+tulosraportointi160512.pdf/dd67d662-1f9a-4400-a9fd-34eb12503a9b.

IV. Country Context

Finland consistently ranks among the top nations in political and civil liberties, freedoms, and public service delivery. The scope of the action plan could have gone further to include civil society concerns regarding regulating the financial sector, campaign finance, and corporate transparency.

Finland is a high-income Nordic country of 5.4 million with an annual GDP of USD 229 billion.[1] Finland consistently receives high scores on good governance indicators. It has a long history of freedom of information rights with legislation dating to 1766.[2] Currently, Finland is ranked 26th on the Global Right to Information index with 105 points out of a possible 150.[3] The 2016 Freedom in the World Report ranks Finland at 100 out of a possible 100 points for civil liberties, political rights, and freedoms.[4] The government has implemented various programs and projects for improving open governance, democracy, and public services, such as the Action Program on eServices and eDemocracy (SADe). Also, the government has launched new digital services for online consultations and citizens' initiatives and has reformed the Local Government Act to more actively involve citizens in decision making.

Finland ranks above other high-income OECD countries in most development indicators, especially in public-service delivery, education, and health care systems. According to the 2015 OECD Country Factsheet, Finland also ranks higher in providing government data that is open, useful, and reusable.[5]

Although high performing, there are still areas in opening government where Finland could improve. According to an OECD report, citizens' confidence in Finland's government has declined by 29 percentage points from 2007 to 2014.[6] A Democracy Policy Report in 2014[7] showed that compared to other Nordic countries Finns are less eager to vote and they feel that their opportunities to influence decision making have decreased. One reason for this change was attributed to the increasingly complex subnational government, in which new methods of direct democracy have become available. However, those methods have not been taken up evenly across society. Citizens who already feel empowered tend to be most active in civic participation, and those who feel disengaged take a less active role in societal decision making. The disengagement of youth, especially young, uneducated men, is a growing concern.[8] Diversity has increased in Finland culturally and demographically. Finland saw an influx of asylum seekers in 2015, when it received 32,476 asylum applications, up almost tenfold from 3,651 in 2014.[9] The integration of immigrants into Finnish society could require future policies and changes in government practice to ensure a smooth transition.

Furthermore, while Finland has consistently been among the least corrupt nations in the world, some consider certain financial practices "hidden corruption." Increasingly, citizens are noticing and disapproving of this type of corruption, which was previously brushed aside as "the custom of the country."[10] Small- and large-scale corruption scandals since 2007[11] have garnered public scrutiny. Neither the first nor the second Finnish action plan has included commitments pertaining to anti-corruption, campaign finance, or public ethics. CSOs feel Finland could improve open government practices is in corporate accountability.

Public concern is also increasing over transparency issues in ownership and the private sector in general, and the public has a greater general awareness of the activities of global corporations, tax avoidance,[12] and unethical activities uncovered in foreign countries.[13] Additionally, concerns about income inequality within Finland have grown, as the economic wealth accumulated in the globalized economy during the last decades has not spread equally

across society.[14] A recent example includes a political initiative to renew existing registries of financial assets. Its supporters quickly abandoned the initiative after the public and many government agencies reacted negatively, perceiving the initiative as a way to increase tax avoidance, money laundering, and other harmful practices.[15] However, the renewal plan was resurrected a few months later with only minor changes.[16]

Stakeholder priorities

The OGP process has had three main types of stakeholders: the national government, the local government, and civil society. Civil servants are the most active stakeholders, while civil society's role has been somewhat smaller. This could be due to the low number of CSOs participating and providing feedback and the higher number of government agencies involved.

Interviewed government representatives also stated that they think of open government as a form of ongoing and continuing reform. They are focused on creating a culture of openness within the government, rather than making actionable items that are achieved in two-year cycles. This is also represented in the form of the national action plan, which in many cases included large overarching targets for the development of more transparent government processes. Overall, the government placed less emphasis on clear and measurable activities that provide access to government-held information or involve citizens in participation and accountability practices.

Civil society representatives, in general, agreed that the action plan's themes are important issues of open government in Finland. Seven out of eight respondents to an online IRM questionnaire saw clear administrative language reforms and the engagement of different age groups as important areas for improvement. These stakeholders valued government efforts to enable more open procedures. However, some CSOs criticized the scope of the commitments and lack of clear actions on how to reach them.

Some CSO representatives said that the government had ignored their suggestions for commitments related to private-sector transparency and access to information. A group of CSOs,[17] including representatives from Open Knowledge Finland, Finnwatch, Transparency International Finland, and Open Ministry, made a joint draft of commitments that should be included in the second action plan. The draft includes 11 commitments and several additional suggestions for advancing OGP values in Finland.

The CSOs' commitment plan addressed transparency both in the private and public sector, open procurement processes, the lobbying registry, open data, and pilot program development about open decision-making processes. The national action plan includes open data commitments and the lobbying registry, but the transparency commitments, which make up most of the CSOs' action plan, were not included. Civil society representatives from this group emphasized that transparency-related commitments should be included in the next action plan.

Other civil society members commented that while the themes of the current action plan are relevant, the commitments and activities do not address priority issues. In addition, while the current action plan includes improving engagement with different age groups, the next action plan should also address engagement with immigrants and other more marginal groups.

Scope of action plan in relation to national context

The current action plan focuses on addressing issues of participation in government decision making and aims to increase the public's trust in government. The commitments center on making information about the government and its actions more available and easier for citizens to understand. The action plan also addresses the issue of citizen engagement with government by providing children, youth, and elderly persons more options to be involved in government planning.

The commitments could potentially lead to a minor increase in citizen trust and engagement in government. However, their potential impact is limited because the commitment activities focus on improving internal government processes, rather than taking a more outward approach. The government has not adopted civil society suggestions on how to change current practices, open up its vital information resources, or improve transparency requirements in the private sector. While these can be politically sensitive issues that would require a high level of support from decision makers, addressing them could have a much stronger impact on improving public trust and citizen engagement. Focusing on such issues would also increase their relevance to the OGP process in Finland and may inspire more active participation from civil society organizations, citizens, media, and decision makers.

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[1] World Bank 2015 Country Data, http://data.worldbank.org/country/finland?view=chart.
[2] Juha Mustonen, ed., *The World's First Freedom of Information Act—Anders Chydenius' Legacy Today* (Kokkola: Anders Chydenius Foundation, 2006) http://bit.ly/1JA2ef.
[3] Global Right to information Ratings, Finland, http://www.rti-rating.org/view_country/?country_name=Finland.
[4] Freedom House, Freedom in the World Report, 2016, https://freedomhouse.org/report/freedom-world/freedom-world-2016.
[5] OECD, "Government at a Glance 2015," OURdata Index: http://www.oecd-ilibrary.org/docserver/download/4215081e.pdf?expires=1475222878&id=id&accname=guest.
[6] Ibid.
[7] Democracy Policy Report 2014 (in Finnish), http://oikeusministerio.fi/fi/index/julkaisut/julkaisuarkisto/1394630106756/Files/OMSO_14_2014_Demokr_selonteko_2014_SU_70_s.pdf.
[8] Democracy Policy Report 2014 (in Finnish), http://oikeusministerio.fi/fi/index/julkaisut/julkaisuarkisto/1394630106756/Files/OMSO_14_2014_Demokr_selonteko_2014_SU_70_s.pdf.
[9] Link to Finnish Immigration Services statistics: http://www.migri.fi/about_us/statistics/statistics_on_asylum_and_refugees.
[10] Laura Katila, *Maan tapa muutoksessa? Poliittisen korruption ja toimintatilan muutos Suomessa vuosina 1988–2011,* Helsingin yliopisto, 2013, https://helda.helsinki.fi/bitstream/handle/10138/39880/Pro%20gradu%20Katila%20Laura.pdf?sequence=2. The change of attitude toward corruption in Finland has been studied by others as well.
[11] "Vaalijohtaja: Vaalirahoituslainrikkominen melko yleistä," YLW, http://bit.ly/1A9JdgU.
[12] Subject discussed in the largest Finnish newspaper, *Helsingin Sanomat:* http://www.hs.fi/talous/a1364011368925.
[13] Subject discussed in the news service by the national Finnish Broadcasting Company: http://yle.fi/uutiset/3-8259580.
[14] Robert Hagfors, *Kotitalouksien kulutusmenojen polarisaatio poikkileikkausaineistolla tarkasteltuna* (Kela, 2014). This subject has been studied by others as well.
[15] News in *Talouselämä* magazine: http://www.talouselama.fi/uutiset/lainsaatajat-ja-verottaja-tyrmaavat-hallintarekisterin-kauppakamari-lopettaisi-yleisojulkisuuden-kokonaan-6062660.
[16] *Helsingin Sanomat*, http://www.hs.fi/kotimaa/a1464227712921.
[17] Full list of CSO participants: Open Knowledge Finland, Finnwatch, Transparency International Finland and Open Ministry, the ethical trade organization Eeti ry, global development organization Kepa ry, Greenpeace, and the Finnish Association for Nature Conservation.

V. General Recommendations

The Finnish OGP process and the second action plan for 2015–2017 has improved from the previous period. For instance, the Civil Servants Network was more involved, and the government did a better job of documenting the action plan's development and implementation.

The IRM researcher notes that most of the commitments in the action plan primarily reflect the priorities of civil servants (with the exception of commitment 4) and focus on improving internal government processes. CSOs were involved in consultation but did not play a major role in creating and implementing commitments.

The IRM researcher recommends using the OGP platform to engage more with civil society actors. For example, OGP could bring a broad range of civil society groups together to identify key areas for open government improvement. Including more watchdog CSOs in the action plan development process could lead to more ambitious commitments. Further, making civil society contributions to the action plan more transparent could increase overall non-government involvement in with OGP. Therefore, the IRM recommends actively soliciting CSO commitment aims and give those commitments higher priority when developing the next action plan.

The following recommendations focus on increasing accountability in the OGP process, engagement with CSOs, and the development of measurable improvements in government practice.

1. Improve commitment quality through better problem-solution framing, clarifying relevance to OGP values, and identifying verifiable milestones.

When writing commitments, the government needs to clearly frame problems and outline specific steps for how to solve those problems. Measurable indicators and time frames should be set for each milestone. In addition, the commitment text should be relevant to OGP values and should explain why the commitment was created, how the activities advance government and CSO objectives, and how the activities will be implemented.

2. Design commitments within the framework of longer-term activities carried out over several action plan cycles.

While Finland's second action plan contained fewer commitments and milestones than in the past, it included many commitments that were broad, overarching themes that did not include clear, verifiable steps for implementation. If a commitment's aim is not achievable within the two-year implementation period, it could be useful to plan longer-term activities that extend through several action plans with specific incremental milestones in each. Government representatives have expressed their frustration that certain issues cannot be implemented in the two-year frame of the action plans, so the IRM researcher recommends dividing these plans into two-year cumulative steps to monitor achievements through the OGP action plan cycles.

3. Diversify participation in OGP by opening meetings and creating opportunities for new actors to propose and monitor commitments in high-priority areas like corruption and corporate transparency.

To create more opportunities for participation at different stages of the OGP process, the Ministry of Finance could arrange quarterly workshops and publicize invitations through multiple channels, reaching more civil society actors. These meetings should be documented and the minutes published online. When developing the action plan, the government could also focus on involving civil society groups outside the "usual suspects," such as CSOs from more diverse issue areas. Ensuring that CSO feedback and commitment proposals are discussed for inclusion in a transparent and open way could better engage stakeholders in OGP. The IRM researcher recommends examining the engagement of children, the youth, and the elderly in the current action plan in order to determine the best ways to encourage participation.

4. Identify civil society partners to monitor each commitment.

The current action plan includes commitments to make government processes easier to understand, but the commitments do not have clear CSO counterparts that can help in planning activities and monitoring their progress. Implementation falls under the responsibility of the government, and agencies are not accountable to any outside monitors for completing implementation. The IRM researcher suggests that each commitment should include one or more CSO counterpart when creating, developing, and implementing commitment activities. Commitments that are introduced by civil society should be prioritized, and if proposed commitments are not feasible, the government should provide CSOs with information about why a topic cannot be included in the action plan.

Government agencies should still be able to introduce commitment ideas, but if no CSO counterpart is found to help formulate and implement the commitment, it should be noted. A wider variety of CSOs should be invited to actively formulate and draft commitments in cooperation with the Ministry of Finance's OGP team.

5. In order to create a more ambitious action plan, the OGP Support Group should improve multiagency coordination and ministerial support around complex issues, such as corporate transparency.

Ministerial- and cabinet-level leadership has not been very involved in the Finnish OGP process. The current action plan is approved and monitored by the minister of local government and local reforms, but the government as a whole has not mandated the implementation of the action plan. This means that certain issues, such as private-sector transparency, seem to be beyond the mandate of OGP in Finland. The IRM researcher recommends seeking more ministerial-level support and broader political engagement for priority commitments that require top-down influence.

Table 5.1: Top Five SMART Recommendations

1. • Improve commitment quality through better problem-solution framing, clarifying relevance to OGP values, and identifying verifiable milestones.
2. • Design specific commitments within the framework of longer-term activities carried out over several action plan cycles (e.g., one- or two-year benchmarks in longer programs of work).
3. • Diversify participation in OGP by opening meetings and creating opportunities for new actors to propose and monitor commitments in high-priority areas like corruption and corporate transparency.
4. • Identify civil society partners to monitor each commitment.
5. • In order to create a more ambitious action plan, the OGP Support Group should improve multiagency coordination and ministerial support around complex issues, such as corporate transparency.

VI. Methodology and Sources

The IRM midterm report is written by well-respected governance researchers based in each OGP-participating country. All IRM reports undergo a process of quality control to ensure 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 organizations.

Each IRM 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 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.

Each report undergoes a four-step review and quality control process:

1. Staff review: IRM staff reviews the report for grammar, readability, content, and adherence to IRM methodology.
2. International Experts Panel (IEP) review: The IEP reviews the content of the report for rigorous evidence to support findings, evaluates the extent to which the action plan applies OGP values, and provides technical recommendations for improving the implementation of commitments and realization of OGP values through the action plan as a whole.
3. Prepublication review: Government and select civil society organizations are invited to provide comments on the content of the draft IRM report.
4. Public comment period: The public is invited to provide comments on the content of the draft IRM report.

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual.[1]

Interviews and focus groups

Each IRM researcher is required to hold at least one public information-gathering event. Care should be taken to invite stakeholders outside of the "usual suspects" list of invitees already participating in existing processes. Supplementary means may be needed to gather the input 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.

To gather the voices of multiple stakeholders, the IRM researcher conducted 15 total interviews, including six with government representatives (from the Ministry of Finance, Ministry of Education and Culture, Ministry of Justice, and Kotus) and nine with CSOs. The nine CSO interviews were conducted individually with representatives from: the Finnish Youth Cooperation, Transparency International Finland, R3, Immigrant Youth Support Organization, Citizen Forum, Open Knowledge Finland, the National Center for Plain Language, the University of Helsinki, the Finnish Union for Senior Services, and the Mannerheim League for Child Protection. These interviews replaced the stakeholder forum. In addition, the researcher circulated a questionnaire[2] online and received eight responses

(one government representative, two CSOs, and five individual citizens). The IRM researcher also reviewed key government documents, which are referenced throughout the report.[3]

The IRM researcher organized a stakeholder meeting in Helsinki on 26 August 2016, sending invitations through social media and through the Ministry of Finance's open government e-mail list. This list included civil servants and other stakeholders that had previously participated in OGP-related activities.[4] Officials from the Ministry of Justice also circulated the invitation to some of their CSO contacts. However, the event received no RSVPs or participants and was cancelled.

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 biannual basis. The International Experts' Panel carries out the design of research and quality control for IRM reports. The panel is comprised of experts in transparency, participation, accountability, and social science research methods.

The current membership of the International Experts' Panel is

- Hazel Feigenblatt
- Hille Hinsberg
- Anuradha Joshi
- Mary Francoli
- Ernesto Velasco-Sánchez
- César Nicandro Cruz-Rubio
- Brendan Halloran
- Jeff Lovitt
- Showers Mawowa
- Fredline M'Cormack-Hale

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.

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[1] www.opengovpartnership.org/dataset/about-irm-page-documents/resource/15a4e644-acf2-4356-b8ae-44881ae2f7fd

2 https://docs.google.com/forms/d/106WZdWY_8VT5M7c9KR3MAkdi3Z1TOM-QFHJeuMlHhwM/edit?usp=sharing.

[3] These documents are listed in the IRM research plan for Finland: http://bit.ly/2b6EF3w.

4 Link to the August 2016 newsletter: http://vm.fi/documents/10623/1193298/Avoimen+hallinnon+uutiskirje+elokuu+2016.pdf/16a24c92-9902-4efc-9393-7d798ecef9fc.

VII. Eligibility Requirements Annex

In September 2012, OGP decided to begin strongly encouraging participating governments to adopt ambitious commitments in relation to their performance in the OGP eligibility criteria.

The OGP Support Unit collates eligibility criteria on an annual basis. These scores are presented below.[1] When appropriate, the IRM reports will discuss the context surrounding progress or regress on specific criteria in the Country Context section.

Table 7.1: Eligibility Annex for Finland

Criteria	2011	Current	Change	Explanation
Budget transparency[2]	ND	ND	No change	4 = Executive's Budget Proposal and Audit Report published 2 = One of two published 0 = Neither published
Access to information[3]	4	4	No change	4 = Access to Information (ATI) Law 3 = Constitutional ATI provision 1 = Draft ATI Law 0 = No ATI Law
Asset declaration[4]	4	4	No change	4 = Asset Disclosure Law, data public 2 = Asset Disclosure Law, no public data 0 = No law
Citizen engagement (Raw score)	4 (9.71) [5]	4 (9.71) [6]	No change	*EIU Citizen Engagement Index* raw score: 1 > 0 2 > 2.5 3 > 5 4 > 7.5
Total / Possible (Percent)	12/12 (100%)	12/12 (100%)	No change	75% of possible points to be eligible

[1] For more information, see http://www.opengovpartnership.org/how-it-works/eligibility-criteria.
[2] For more information, see Table 1 in http://internationalbudget.org/what-we-do/open-budget-survey/. For up-to-date assessments, see http://www.obstracker.org/.
[3] The two databases used are Constitutional Provisions at http://www.right2info.org/constitutional-protections and Laws and Draft Laws at http://www.right2info.org/access-to-information-laws.
[4] Simeon Djankov, Rafael La Porta, Florencio Lopez-de-Silanes, and Andrei Shleifer, "Disclosure by Politicians," (Tuck School of Business Working Paper 2009-60, 2009), http://bit.ly/19nDEfK; Organisation for Economic Co-operation 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" (Washington, DC: World Bank, 2009), http://bit.ly/1clokyf. For more recent information, see http://publicofficialsfinancialdisclosure.worldbank.org. In 2014, the OGP Steering Committee approved a change in the asset disclosure measurement. The existence of a law and de facto public access to the disclosed information replaced the old measures of disclosure by politicians and disclosure of high-level officials. For additional information, see the guidance note on 2014 OGP Eligibility Requirements at http://bit.ly/1EjLJ4Y.
[5] "Democracy Index 2010: Democracy in Retreat," The Economist Intelligence Unit (London: Economist, 2010), http://bit.ly/eLC1rE.
[6] "Democracy Index 2014: Democracy and its Discontents," The Economist Intelligence Unit (London: Economist, 2014), http://bit.ly/18kEzCt.