Open Government Partnership Independent Reporting Mechanism
Procedures Manual

Overview

This document summarizes the Independent Reporting Mechanism's (IRM) products, processes, and methodology. If you have questions or require further information contact irm@opengovpartnership.org.

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IRM Foundations

What is the IRM?

The Independent Reporting Mechanism (IRM) is OGP's accountability arm and the main means of tracking progress in participating countries. The IRM provides independent, evidence-based, and objective reporting to hold OGP participating governments accountable and support their open government efforts. This is done through reports, services and timely recommendations during key moments in the action plan cycle. See here for information about OGP more broadly.

IRM Values
- Independent
- Objective
- Evidence-based

IRM Governance

Structure

The IRM is located within the Accountability & Learning Cluster of the OGP Support Unit. The IRM works with the Support Unit - such as collecting input from colleagues on draft reports and coordinating on services for members. However, the IRM maintains a level of independence from the Support Unit and has ultimate ownership over IRM products. The IRM Lead oversees IRM staff. The IRM works closely with a range of external partners including:
- Research consultants
- Expert reviewers
- Translators and copy editors

International Experts Panel

The IRM works with, but independently from, the OGP Support Unit. To maintain independence, the IRM reports to the International Experts Panel (IEP). The IEP guarantees the independence and quality of the IRM through governance and advisory of the IRM as a whole, and quality assurance of the IRM process. IEP members are renowned experts in transparency, participation, and accountability who play the principal role of guiding development and implementation of the IRM research method and ensuring the highest quality of reports. More information on the current IEP and summaries from quality assurance sessions can be found here.

IRM Products

Action Plan Cycle Products

The IRM produces products throughout the action plan cycle to ensure timely and targeted analysis and recommendations. These products include:

Co-Creation Brief: The Co-Creation Brief shares lessons from past action plans and international open government practice to support multi-stakeholder forums and/or governments to co-design high quality, ambitious and feasible action plan commitments. It is published and shared with country stakeholders before or early in the co-creation process. The latest template can be found [here](#).

Action Plan Review: The Action Plan Review analyzes the action plan's characteristics to inform a stronger implementation process. It is a technical review of the action plan's strengths and challenges that provides recommendations on how to achieve effective implementation and results. It identifies and focuses on the most promising commitments and assesses the co-creation process. The Action Plan Review commences just after the action plan is submitted to OGP. The latest template can be found [here](#).

Midterm Review: The IRM provides a Midterm Review to members undertaking four-year action plans. Countries that submit four-year action plans have to schedule a mandatory refresh period at the two-year mark. The Midterm Review evaluates the refresh process and any refreshed or new commitments. It also provides a general update on implementation progress. The latest template can be found [here](#).

Results Report: The Results Report supports accountability and learning. It assesses the level of completion of action plan commitments and checks compliance with OGP standards and criteria. For example, the level of meaningful engagement and collaboration with in-country stakeholders throughout implementation. It includes insights and lessons on how change happens and the enablers or constraints in implementing promising open government reforms. The latest Results Report template can be found [here](#).

Other Products

The IRM produces products to support OGP's work beyond the action plan cycle. These products may evolve to reflect changes in OGP's action framework and strategy over time. Additional IRM products include:

IRM Report on Local Action Plans: The IRM Report on Local Action plans is a biennial report that draws out innovations and obstacles faced by local open government reformers. It explores lessons learned, success stories, and new approaches to open government from local governments that implemented OGP commitments during the previous two years.

Open Government Journeys: Open Government Journeys capture the story of reform over time in some of OGP's longest participating members. In this series, the IRM explores the challenges, major achievements, and the future of open government. Understanding the steps it takes to shift the status quo to more transparent, accountable, and responsive governance holds lessons for all reformers looking to apply open government principles to real-world challenges.

IRM Services

The IRM collaborates with the OGP Support Unit to provide services to member countries. IRM services aim to distill and communicate IRM findings and recommendations at key moments in members' OGP processes. IRM services may include discussion on report findings, workshops on commitment design, or a discussion on how the IRM assesses OGP rules and standards.

IRM Methodology

The IRM assesses countries' open government progress and processes. To assess countries' progress on open government reforms, the IRM assesses individual commitments in countries' action plans. The first subsection outlines the indicators and guidelines the IRM applies to assess commitments. The IRM also assesses whether countries' OGP processes align with OGP rules and standards. The second subsection outlines IRM indicators and guidelines for IRM assessment of countries' compliance with OGP rules and standards.

Commitment Assessment

Action Plan Review Indicators

Upon submission of an action plan to OGP, the IRM assesses all commitments under three indicators in the Action Plan Review:
- Verifiability
- Open government lens
- Potential for results

Verifiability: The IRM determines whether a commitment is verifiable as written in the action plan. The indicator is assessed as:
- **Yes/No:** Are the stated objectives and proposed actions sufficiently clear and include objectively verifiable activities to assess implementation?
- Commitments that are not verifiable are considered not reviewable, and no further assessment is carried out.

Open government lens: The IRM determines if the commitment relates to the open government values of transparency, civic participation, or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance. Based on a close reading of the commitment text, the indicator is assessed as:
- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:
- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?

- **Civic Participation:** Will the government create or improve opportunities, processes, or

mechanisms for the public to inform, influence or co-create policies, laws and/or decisions? Will the government create, enable, or improve participatory mechanisms for minorities, marginalized or underrepresented groups?

Will the government improve the enabling environment for civil society (which may include NGO laws, funding mechanisms, taxation, reporting requirements, etc.)? Will the government improve legal, policy, institutional or practical conditions related to civic space such as freedom of expression, association and peaceful assembly that would facilitate participation in the public sphere? Will the government take measures which counter mis- and disinformation, especially online, to ensure people have access to reliable and factual information (which may include digital and media literacy campaigns, fact-checking or fostering an independent news media ecosystem)?

- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

Potential for Results: The IRM analyzes the expected results and potential that would be verified in the IRM Results Report after implementation. Potential for results is an early indication of the commitment's possibility to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area. The indicator is assessed as:
- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

Additional methodological notes for Action Plan Reviews
Action Plan Reviews focus their analysis on promising commitments. Promising commitments are verifiable, have an open government lens, and at least a modest potential for results. Promising commitments may also be a priority for national stakeholders or for the particular context. The IRM may cluster commitments with a common policy objective or that contribute to the same reform or policy issue. The potential for results of clustered commitments is reviewed as a whole.

Results Report Indicators

Upon completion an implementation period, the IRM assesses each commitment using two indicators in the Results Report:
- Completion
- Early Results

Completion: The IRM assesses the level of completion for each commitment in the action plan as one of the following:
- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results: The IRM assesses the level of results achieved from the implementation of commitments using the early results indicator. The IRM considers the expected aim of the commitment prior to its implementation, the country context in which the commitment was implemented, the policy area, and the changes reported. The early results indicator establishes three levels of results:

No Notable Results: According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
- improving practices, policies or institutions governing a policy area or within the public sector,
- enhancing the enabling environment to build trust between citizens and the state.

Moderate Results: According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
- improving practices, policies or institutions governing a policy area or within the public sector, or
- enhancing the enabling environment to build trust between citizens and the state.

Significant Results: According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
- improving practices, policies or institutions governing a policy area or within the public

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sector, or
- enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

Midterm Review Commitment Assessment

Countries may submit a refreshed action plan at the midpoint of a 4-year action plan. The IRM assesses all new or significant amended commitments in a refreshed action plan, using the same indicators as the Action Plan Review. The IRM considers commitments to be significantly amended if the changes lead to new codings in their verifiability, open government lens, or potential for results.

OGP Rules & Standards Assessment

The OGP Participation and Co-Creation Standards set the expectation for government and civil society engagement during countries' OGP cycle. The IRM analyzes to what extent countries' OGP processes align with the Standards. In particular, the IRM reviews whether countries' practices meet the minimum requirements established under the Standards. The IRM Guidelines for the Assessment of OGP's Minimum Requirements provides details on the evidence and information the IRM will look for to assess compliance. Below is a table summarizing the minimum requirements and the reports in which they are assessed.

Key:
- Assessed: The IRM assesses compliance as a Yes or No coding
- Check: An informal review of the status of compliance
- Not Applicable: Neither assessed nor checked

	IRM Report		
Minimum requirement	**Action Plan Review**	**Midterm Review***	**Results Report**
1.1 A space for ongoing dialogue with participation from both government and civil society members, and other non-governmental representatives as appropriate that meets regularly (at least every six months) is established. Its basic rules on participation are public.	Assessed	Checked	Assessed
2.1 A public OGP website dedicated to the members participation in OGP is maintained.	Assessed	Checked	Assessed
2.2 A publicly available document repository on the OGP online site which provides access to documents related to the OGP process, including, at a minimum, information and evidence of the co-creation process and of the implementation of commitments is maintained and regularly updated (at least twice a year).	Assessed	Checked	Assessed
3.1 The MSF where established, or the government where there is no MSF, publishes on the OGP website/webpage the co-creation timeline and overview of the opportunities for stakeholders to participate at least two weeks before the start of the action plan development process.	Assessed	Assessed for refresh process	Not applicable
3.2 The MSF where established, or the government where there is no MSF, conducts outreach activities with stakeholders to raise awareness of OGP and opportunities to get involved in the development of the action plan.	Assessed	Not applicable	Not applicable
3.3 The MSF where established, or the government where there is no MSF, develops a mechanism to gather inputs from a range of stakeholders during an appropriate period of time for the chosen mechanism.	Assessed	Not applicable	Not applicable
4.1 The MSF where established, or the government where there is no MSF, documents and reports back or publishes written feedback to stakeholders on how their contributions were considered during the development of the action plan.	Assessed	Assessed for refresh process	Not applicable
5.1 The MSF where established, or the government where there is no MSF, holds at least two meetings every year with civil society to present results on the implementation of the action plan and collect comments.	Not applicable	Checked	Assessed

* Midterm Reviews are only conducted for 4-year action plans.

IRM Assessment of Compliance and Procedural Review

The OGP Procedural Review Policy outlines the circumstances and steps taken when a country is not acting in accordance with OGP process. The IRM assesses two of the three triggers for a country to be considered acting contrary to OGP process. First, a country must meet all the minimum requirements established in the OGP Participation and Co-Creation Standards. Second, a country is considered acting contrary if it fails to make progress on any of the commitments in an action plan. The IRM notifies the Support Unit when it has determined that a country is not acting according to OGP process according to these triggers.

Report Production

Report Production Process

IRM reports undergo a robust review process to ensure quality and consistency. All Action Plan Reviews and Results Reports undergo the following report production process:

- IRM researchers conduct interviews, desk research, and draft a report under the supervision of IRM staff. Initial drafts undergo several rounds of review by IRM staff.

- An expert reviewer provides comments on the draft. Expert reviewers are professionals in the open government field who review reports to ensure quality and consistent application of IRM methodology. The IRM works with the researcher as needed to address comments received from the expert reviewer.

- OGP Support Unit staff provide comments on the draft report, when relevant.

- The IRM shares the draft report for a 21-day pre-publication review period with key national OGP actors, such as the OGP Point of Contact and members of the countries' multi-stakeholder forum. The IRM works with the researcher to review and incorporate pre-publication comments, as appropriate. The IRM provides a summary of how the comments were incorporated to the national OGP Point of Contact.

    - [IRM Guidance on Pre-Publication Review Comments](#)

- The report is copy edited. Reports are translated to the country's administrative language. Reports for Spanish-speaking countries in the Americas are produced and published in Spanish.

- The IRM shares the report for a 14-day public comment period on the OGP website. Anyone is welcome to submit comments. The IRM works with the researcher to review and incorporate public comments, as appropriate. The IRM publishes public comments received alongside the final version of the report, unless requested otherwise.

- The final report is published on the OGP website and the link is shared with the national OGP Point of Contact.

Note: Co-Creation Briefs and Midterm Reviews undergo a modified production process. This ensures timely provision of findings and recommendations to support countries' open government reforms. Co-Creation Briefs undergo internal review before publication. Midterm Reviews undergo internal review and a pre-publication review period before publication.

Researcher Pool

The IRM collaborates with researchers around the world to produce IRM reports. IRM researchers are selected for their expertise in open government policy areas and contextual knowledge. IRM researchers are organized into one of four regional pools (Americas, Europe, Africa and Middle East, or Asia Pacific) based on their contextual knowledge, language, and location. Researchers

are assigned IRM reports corresponding to their regional pool. All IRM researchers receive regular training and resources to ensure understanding of IRM methodology and emerging open government policy issues. The IRM introduces the IRM researcher to the national OGP Point of Contact at the commencement of the research process for a report.

Due Diligence Policy

The IRM's due diligence policy establishes the level of IRM responsibility to seek evidence when it is not readily available. Due diligence refers to a good faith effort to seek information necessary to assess an IRM indicator. As a first step, the IRM researcher will seek evidence in a country's OGP website or repository. The researcher will then make at least two attempts to reach the government contact responsible for the commitment in question as listed in the action plan. These attempts will include at least two modes of communication (email, phone call, request through the OGP Point of Contact). If these efforts do not result in the necessary information, then the absence of evidence and efforts made will be noted and accounted for in the IRM report.

IRM Writing Style and Tone

The IRM sets common expectations for evidence, tone, and writing style across products. Given the IRM objective to support members' learning and accountability, the tone of IRM products is:

- Neutral
- Evidence-based
- Diplomatic
- Constructive
- Professional
- Authoritative

The IRM maintains a high standard to ensure that all analysis and findings are underpinned by evidence. Evidence is primarily collected through desk research and interviews and cited directly in reports. The IRM may anonymize interviewees in exceptional cases. IRM staff and researchers take into consideration the following qualities of information sources when analyzing evidence: neutrality, incentives and bias, power dynamics, as well as authoritativeness and trustworthiness. The IRM use of evidence in analysis is guided by the following criteria: robustness, balance, corroboration, and accurate representation.

Spelling and grammar for IRM products differs by region. English products are written in American English with exceptions. All reports for Spanish speaking countries are produced and published in Spanish. Products for the UK and Commonwealth countries follow British spelling and grammar conventions. Reports for Canada, New Zealand, and Australia follow English conventions in those countries.

IRM Ethics

Ethical Principles and Practices

Key ethical principles for research conducted for the IRM align with OGP's values of openness, accountability, and public participation. These principles ensure the integrity and trustworthiness of the work and assessments of the IRM.

The following key ethical principles guide IRM research:

Principle	Examples of what it looks like in practice
Objectivity	Researchers apply the IRM methodology consistently to establish the facts. The evidence gathered informs findings and the analysis in IRM reports. Researchers interview a diverse and balanced range of stakeholders, ensuring input from both government and civil society.
Independence	Researchers are not affiliated with government, CSOs, or international bodies whose OGP activities are being assessed. Researchers adhere to the [IRM Conflict of Interest Policy](). The IRM has final authority over the content of IRM products, although it considers input from third parties, country stakeholders and the OGP Support Unit.
Transparency	Information on IRM methodology, process and findings are publicly available online. IRM staff are available to address questions, concerns, or discuss findings. Researchers ensure that interviewees understand the purpose of research and how the information they provide will be used. The IRM and researchers explicitly state in reports when there is weak or insufficient evidence to make an assessment and explain due diligence efforts made to collect relevant evidence.
Accountability	The IRM shares reports with key stakeholders for a 21 day pre-publication and a 14 day public comment period. The IRM

	provides a summary to relevant stakeholders of how pre-publication comments were addressed and publishes public comments submitted alongside the final version of the report. The IRM is available to meet with stakeholders who request to discuss concerns and questions around IRM methodology, processes, or findings.
Adaptability	The IRM regularly updates its methodology, products, reporting templates, guidance, and processes to respond to recommendations from the IEP, new developments in OGP and/or address challenges. The IRM provides ongoing training and resources to staff and researchers to continuously strengthen their application of IRM methodology and open government expertise.
Duty of Care	The IRM seeks to 'do no harm' by considering and mitigating risks to participants. Researchers ensure that interviewees understand possible risks and consent to participating in the research process. The IRM produces products that aim to maximize the public good by supporting accountability and learning in OGP. The IRM undertakes its work in a way that promotes information sharing, showcasing best practices, and dialogue.
Responsible Data Use and Privacy	Researchers and the IRM follow the data protection laws and standards set by the IRM. Researchers and the IRM use evidence and information collected solely for the purpose of that particular OGP product. Researchers delete any research materials with personally identifiable information from their personal computers following completion of a report. The IRM considers measures to ensure stakeholder safety, such as the provision of anonymity for interviewees when necessary.

Conflict of Interest Policy

Below is a summary of the IRM's [Conflict of Interest Policy](#).

The IRM recognizes that an essential aspect of its credibility is its independence, both substantive and perceived. IRM staff, researchers, and IEP members will strive to avoid any conflict of interest between the interests of the IRM on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

Conflict of interest is understood to be any situation in which the personal interest or interests owed to another body, of those subject to the policy, run counter to those of the IRM. It occurs in those situations where an IRM researcher, external reviewer, or IEP member stands to gain, directly or indirectly, through engagement in activities that may potentially adversely affect the independence, credibility, or impartiality of IRM assessments or the review process. It also occurs if that individual is engaged with an organization whose aims are incompatible with those of the IRM.

There are three categories of conflict of interest:
- An actual conflict of interest involves a direct conflict between the researchers, external reviewers, or IEP duties and responsibilities in their IRM capacity and existing personal interests.
- A perceived conflict of interest exists in situations where a reasonable person would think that a researcher, external reviewer, or IEP's judgment is likely to be compromised by private interests that could improperly influence the performance of their duties for IRM—whether this is in fact the case.
- A potential conflict of interest involves a situation that may develop into an actual conflict of interest if the researchers, external reviewers, or IEP has or develops personal interests that could conflict with their official duties in the future.

Conflict of Interest Procedures

IRM researchers, external reviewers, and IEP members will submit a conflict of interest declaration on an annual basis. The declarations will be kept in the conflict of interest repository. It is the responsibility of IRM researchers, external reviewers, and IEP members to inform IRM staff promptly of any change in circumstances which may engage the Conflict of Interest Policy, as well as to share any concerns they may have that engage the Conflict of Interest Policy.

The body responsible for the review of conflict of interest situations is the Ethics Taskforce of the International Experts Panel. IRM staff's role in the Taskforce is to prepare, raise, and inform discussions on the cases presented for the IEP Taskforce determination.

An actual conflict of interest shall require immediate dismissal or be a cause for ineligibility to contract. Potential and perceived conflicts of interest may require additional interventions to safeguard IRM's interests and mitigate risks. In such an event, the Ethics Taskforce will identify appropriate mitigation measures. If such mitigation measures cannot be mutually agreed upon, then the IRM reserves the right to withdraw from the hiring process or may recommend termination of contract.