

# Independent Reporting Mechanism (IRM): Finland End-of-Term Report 2015–2017

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## Executive Summary: Finland

Independent Reporting Mechanism (IRM) End-of-Term Report 2015–2017

Finland made progress in clarifying service delivery information, making budget data more accessible and broadening civic participation. Although all commitments were substantially completed, they have led to only marginal improvements in government transparency and civic engagement.

The Open Government Partnership (OGP) is a voluntary international initiative that aims to secure commitments from governments to their citizenry to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. The Independent Reporting Mechanism (IRM) carries out a review of the activities of each OGP-participating country. This report summarizes the results of Finland's second national action plan, implemented between July 2015 and June 2017, and includes some relevant developments up to January 2018.

Finland joined the Open Government Partnership in 2012 and the implementation of the first plan started in July 2013. The OGP process in Finland is coordinated by the Ministry of Finance. During the second implementation period (2015–2017), an OGP Support Group was nominated by the Ministry of Finance and comprised 16 representatives from government and civil society. Additionally, the Civil Servants Network, and KANE (the CSO-chaired civil society policy board) have played a major role in implementation of the OGP plan.

The government published an end-of-term self-assessment report on 22 September 2017. Among the second action plan's successes were establishing procedures to open datasets, clarifying administrative language and experimenting with engagement methods for youth and elderly citizens. Many of the plan's milestones have made access to information easier, but many also strongly focus on improving internal government processes, thus lacking a public-facing element.

Finland's third OGP action plan began implementation in July 2017, and contains seven commitments. Several were carried forward from the second OGP action plan, such as clarification of administrative language, engaging vulnerable groups and opening data. The IRM progress report recommended the next action plan specify issues and solutions, have clear relevance to OGP values and include verifiable milestones. The third action plan states that the government will produce an annex including a timetable, commitment indicators for follow-up and assessment, a checklist assessment tool and an online questionnaire for collecting information on implementation. As of January 2018, the annex is not available.

<b>Table 1: At a Glance</b>		
	<b>Mid-term</b>	<b>End-of-Term</b>
Number of Commitments	4	4
<b>Level of Completion</b>		
Completed	0	0
Substantial	3	4
Limited	1	0
Not Started	0	0
<b>Number of Commitments with...</b>		
Clear Relevance to OGP Values	4	4
Transformative Potential Impact	0	
Substantial or Complete Implementation	3	4
<b>All Three (☺)</b>	0	0
<b>Did It Open Government?</b>		
Major	0	
Outstanding	0	
<b>Moving Forward</b>		
Number of Commitments Carried Over to Next Action Plan	4	

## Consultation with Civil Society during Implementation

Countries participating in OGP follow a process for consultation during development and implementation of their action plan. In Finland, the OGP process is coordinated by the Ministry of Finance. In May 2015, the Ministry of Finance nominated an OGP implementation support group. The support group consisted of 16 civil servants from several ministries, agencies and local government bodies, as well as five CSO representatives. The OGP Support Group met several times a year to discuss the action plan's implementation,<sup>1</sup> and public records of the meetings have been available online since March 2016.<sup>2</sup> Overall, the engagement of CSOs during implementation was limited, largely because the action plan focuses on government processes and most CSOs are not directly involved with specific commitments.<sup>3</sup> Government representatives from the Civil Servants Network,<sup>4</sup> the Local Democracy Network,<sup>5</sup> and KANE (the CSO-chaired Advisory Board for Civil Society Policy)<sup>6</sup> were consulted in supporting the implementation of the action plan.

Finland's consultation process included allowing comments and input on the portals Lausuntopalvelu.fi, the otakantaa discussion forum, and the ZEF-web tool, in addition to informing the public through themed workshops, fairs and events. Online consultation was collected and responded to publicly on the portal, but the consideration of other public inputs, such as feedback provided at workshops, has not been publicized. Information about the Open Government Partnership and Finland's action plan was distributed at several events around Finland.<sup>7</sup> The Open Government monthly newsletter was distributed via a mailing list and published online between June 2016 and June 2017.<sup>8</sup> For full details on participative activities, please see the IRM progress report.

Finland's midterm self-assessment draft report was available for public comment for two weeks starting 1 September 2016. The report outlines the actualized activities under each of the four commitments, but does not measure completion levels nor address delayed activities. The final version of the end-of-term self-assessment report is dated 22 September 2017 and is available online,<sup>9</sup> but it is largely based on the midterm self-assessment report and lacks up-to-date information on many of the commitments. The report is only available in the Finnish language.

Table 2: Consultation during Implementation

Regular Multi-stakeholder Forum	Midterm	End-of-Term
1. Did a forum exist?	Yes	Yes
2. Did it meet regularly?	Yes	Yes

Table 3: Level of Public Influence during Implementation

The IRM has adapted the International Association for Public Participation (IAP2) "Spectrum of Participation" to apply to OGP.<sup>1</sup> This spectrum shows the potential level of public influence on the contents of the action plan. In the spirit of OGP, most countries should aspire for "collaborative."

<sup>1</sup>[http://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/foundations\\_course/IAP2\\_P2\\_Spectrum\\_FINAL.pdf](http://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/foundations_course/IAP2_P2_Spectrum_FINAL.pdf)

Level of Public Influence during Implementation of Action Plan		Midterm	End of Term
Empower	The government handed decision-making power to members of the public.		
Collaborate	There was iterative dialogue AND the public helped set the agenda.		
Involve	The government gave feedback on how public inputs were considered.		
Consult	The public could give inputs.		
Inform	The government provided the public with information on the action plan.	✓	✓
No Consultation	No consultation		

## About the Assessment

The indicators and method used in the IRM research can be found in the IRM Procedures Manual.<sup>10</sup> One measure, the “starred commitment” (★), deserves further explanation due to its particular interest to readers and usefulness for encouraging a race to the top among OGP-participating countries. Starred commitments are considered exemplary OGP commitments. To receive a star, a commitment must meet several criteria:

- Starred commitments will have “medium” or “high” specificity. A commitment must lay out clearly defined activities and steps to make a judgment about its potential impact.
- 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.<sup>11</sup>
- The government must make significant progress on this commitment during the action plan implementation period, receiving an assessment of “substantial” or “complete” implementation.

Starred commitments can lose their starred status if their completion falls short of substantial or full completion at the end of the action plan implementation period.

In the midterm report, Finland’s action plan did not contain any starred commitments. At the end of term, based on the changes in the level of completion, Finland’s action plan contained 0 starred commitments.

Finally, the tables in this section present an excerpt of the wealth of data the IRM collects during its reporting process. For the full dataset for Finland see the OGP Explorer at [www.opengovpartnership.org/explorer](http://www.opengovpartnership.org/explorer).

## About “Did It Open Government?”

To capture changes in government practice the IRM introduced a new variable “Did It Open Government?” in end-of-term reports. This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice has changed as a result of the commitment’s implementation.

As written, some OGP commitments are vague and/or not clearly relevant to OGP values but achieve significant policy reforms. In other cases, commitments as written appear relevant and ambitious, but fail to open government as implemented. The “Did It Open Government” variable attempts to capture these subtleties.

The “Did It Open Government?” variable assesses changes in government practice using the following spectrum:

- **Worsened:** Government openness worsens as a result of the commitment.
- **Did not change:** No changes in government practice.
- **Marginal:** Some change, but minor in terms of its effect on level of openness.
- **Major:** A step forward for government openness in the relevant policy area, but remains limited in scope or scale.
- **Outstanding:** A reform that has transformed “business as usual” in the relevant policy area by opening government.

To assess this variable, researchers establish the status quo at the outset of the action plan. They then assess outcomes *as implemented* for changes in government openness.

Readers should keep in mind limitations. IRM end-of-term reports are prepared only a few months after the implementation cycle is completed. The variable focuses on outcomes that can be observed in government openness practices at the end of the two-year implementation period. The report and the variable do not intend to assess impact because of the complex methodological implications and the timeframe of the report.

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<sup>1</sup> Midterm report, p. 8,

[http://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017\\_for-public-comment.pdf](http://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017_for-public-comment.pdf)

<sup>2</sup> The OGP support group meeting records,

<http://vm.fi/hallinnon-avoimuus/avoim-hallinto/tukiryhman-toiminta>

<sup>3</sup> Midterm report, p. 15,

[http://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017\\_for-public-comment.pdf](http://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017_for-public-comment.pdf)

<sup>4</sup> All members of the network are listed on the Ministry of Finance’s website,

<http://vm.fi/documents/10623/1194961/Avoimen+hallinnon+virkamiesverkosto+9.11.2015.pdf/11433a04-1000-4721-a969-55bff19e9488>

<sup>5</sup> The Local Democracy Network yearly schedule,

[https://view.officeapps.live.com/op/view.aspx?src=https://www.kuntaliitto.fi/sites/default/files/media/file/KDverkosto\\_vuosikello\\_2017\\_0.pptx](https://view.officeapps.live.com/op/view.aspx?src=https://www.kuntaliitto.fi/sites/default/files/media/file/KDverkosto_vuosikello_2017_0.pptx)

<sup>6</sup> All members of the advisory board are listed on the Ministry of Justice’s website. The Board is chaired by civil society, and a new board is nominated every four years by the Ministry of Justice.

<http://oikeusministerio.fi/kanen-kokoonpano>

<sup>7</sup> Finland’s End-of-term self-assessment report, 2015–2017 (in Finnish), p. 4,

[http://avoimhallinto.fi/assets/files/2017/10/Avoim-hallinto\\_-khoitsearviointiraportti-2017.pdf](http://avoimhallinto.fi/assets/files/2017/10/Avoim-hallinto_-khoitsearviointiraportti-2017.pdf)

<sup>8</sup> Open Government website of the Ministry of Finance, [www.avoimhallinto.fi](http://www.avoimhallinto.fi)

<sup>9</sup> Finland’s End-of-term self-assessment report, 2015–2017 (in Finnish),

[http://avoimhallinto.fi/assets/files/2017/10/Avoim-hallinto\\_-khoitsearviointiraportti-2017.pdf](http://avoimhallinto.fi/assets/files/2017/10/Avoim-hallinto_-khoitsearviointiraportti-2017.pdf)

<sup>10</sup> IRM Procedures Manual, <http://www.opengovpartnership.org/about/about-irm>.

<sup>11</sup> The International Experts Panel changed this criterion in 2015. For more information, visit <http://www.opengovpartnership.org/node/5919>.

# Commitment Implementation

## General Overview of Commitments

As part of OGP, countries are required to make commitments in a two-year action plan. The tables below summarize the completion level at the end of term and progress on the “Did It Open Government?” metric. For commitments that were complete at the midterm, the report will provide a summary of the progress report findings but focus on analysis of the ‘Did It Open Government?’ variable. For further details on these commitments, please see the Finland IRM progress report 2015-2016.

Finland’s second national action plan continued with similar themes to the first action plan, focusing on ensuring clear administrative information and language; opening up administrative procedures; increasing consultation with and improving participation of citizens in decision making; and specifically targeting vulnerable groups such as youth, children and the elderly in order to increase their engagement.

Finland’s second action plan includes two versions of milestone 1.1: “Promoting OGP values with local authorities” and “Clear structures and processes.”

**Table 4: Assessment of Progress by Commitment**

Commitment Overview	Specificity				OGP Value Relevance				Potential Impact				Completion		Midterm	Did It Open Government?			
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial		Completed	End-of-Term	
																		Worsened	Did Not Change
1. Clear administrative language			✓		✓					✓				✓					
2. Government as enabler		✓			✓	✓		✓						✓					✓
3. Open procedures			✓		✓	✓		✓					✓		✓				✓
4. Engagement of Children, the Youth, and the Elderly		✓				✓				✓					✓				✓

## **Commitment I. Clear administration**

### **Commitment Text:**

*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(s): Ministry of Finance

Supporting Institution(s): Ministries, agencies, municipalities, association of local and regional authorities, Institute for the Languages of Finland

Start Date: 1 July 2015

End Date: 30 June 2017

Commitment Overview	Specificity				OGP Value Relevance				Potential Impact				Completion		Midterm	Did It Open Government?						
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial		Completed	End-of-Term				
I. Overall			✓		✓				✓						✓			Worsened	Did Not Change	✓	Major	Outstanding

### Commitment Aim:

This commitment was continued from Finland's previous action plan, and it addresses the need for clearer structures and processes of the government administration. The cornerstone of the commitment is the clarification of official parlance in order to facilitate citizens' understanding of the substance and argumentation of administrative decision making. In addition, the commitment aims to increase visual and accessible information. Specifically, the commitment targets large change projects, such as the regional government, health and social services reforms (due to be complete by 2020), during which citizens may feel distanced from the administration and feel that their opportunities to influence decision making are scarce. A focal activity of the commitment, instigated by citizens' frequent inquiries and appeals, has been the clarification of government communication in customer letters and administrative instructions.

### Status

#### Midterm: Substantial

The completion of this commitment was substantial at midterm. In May 2016, the Prime Minister's office published a clear language guide for civil servants. Updated clear language documents were produced by 20 government ministries and agencies. An interactive visual representation of the state budget was uploaded to the Ministry of Finance website as a result of the hackathon organized by the Civil Servants Network and Ministry of Education and Culture in October 2016. As part of the National Architecture for Digital Services Project, the beta version of the Suomi.fi Web Service was made available upon midterm, and the service's full functionality was expected in 2017. Plain language documents still comprised only a small fraction of government services and materials,<sup>1</sup> and the implementation of aligning government websites to be compatible with assistive devices for citizens with disabilities had not yet begun. For more details, see the Midterm Progress Report.

#### End-of-term: Substantial

As stated in the midterm report, many of the commitments lack measurable targets and specificity. According to a CSO representative, changing protocols within civil service has been a slow process, but the commitment milestones have been advanced during the second half of the implementation period.<sup>2</sup> The government was to conduct an internal survey at the beginning and end of the implementation period, assessing the progress of each activity. The end-of-term government self-assessment report states that such a survey was conducted in September 2015.<sup>3</sup> However, the resultant report from the survey was not published until 14 February 2018, well after the implementation period concluded in July 2017.<sup>4</sup> There is no publicly available evidence to indicate an end-of-term survey was conducted and published.

#### 1.1 Clear Structures and Processes



The implementation of the Government Program and its key projects for 2015–2019,<sup>5</sup> and later for 2017–2019 were published online.<sup>6</sup> Both publications use visualizations to describe complex government structures and processes. While this can help visualize and present information in a more understandable way, it is unclear whether citizens find these changes useful or if it has improved their ability to access government information. According to the government's end-of-term self-assessment report, published after the end of the implementation period, 19 percent of respondents to customer surveys assessed that the work done on clarifying structures and processes in their organization had been impactful, yet 74 percent felt it had little to no impact.<sup>7</sup>

### *1.2 Official Parlance Clearer*

Collaboration between ministries, agencies and CSOs on clarifying official parlance continued after the midterm, and an informal Official Parlance Working Group had been established.<sup>8</sup> However, lists of clear and plain language materials published since the midterm have not been outlined in the self-assessment report,<sup>9</sup> and the IRM researcher found no evidence of an official priority list for such materials. According to a representative of the Ministry of Finance, the lack of plain language experts is hindering fulfillment of this commitment.<sup>10</sup>

### *1.3. Material in plain language*

The seven, plain language material pilot projects launched as part of the clear administrative language campaign have produced some results. The Ministry of Transport's new Road Traffic Act proposal was published for public comment in February 2017, and it was presented to the government on 23 November 2017.<sup>11</sup> The Finnish Transport Safety Agency renewed its outgoing automatic correspondence, such as documents pertaining to driving licenses and vehicle registration.<sup>12</sup> The textual information on Kela's Youth Disability Allowance was made clearer in order to better support the allowance application process. The Finnish Immigration Service (Migri) added graphics to its website in order to clarify the processes of applying for licenses and citizenship. The Finnish Tax Administration renewed its webpages aimed at budding entrepreneurs. The City of Vaasa clarified texts produced by the city council, organized clear administrative language trainings for civil servants, and renewed administration, decision-making and city planning vocabulary. The City of Tampere improved its instructions for drafting and produced plain language materials with the Pirkanmaa Health Care District.<sup>13</sup> Consequently, the campaign produced clear language experience cards<sup>14</sup> and guidelines for civil servants.<sup>15</sup>

### *1.4. Visualizations Used*

An Open Government Support Package was created during spring 2017. It contains visual information on open government principles, clear administration and communication, democracy and participation tools, as well as open data.<sup>16</sup> Other visualizations produced after the midterm include:

- The Tutki Budjettia service<sup>17</sup> (Examine the Budget), published on 22 September 2016. The service was part of an undertaking by the Ministry of Finance aimed at opening government budget data and making it easier to use. The “Budget Belongs to All” hackathon was a success according to a representative of the Ministry of Finance, although it was reduced to a one-day event.<sup>18</sup> The website of the hackathon is down at the time of writing the report.<sup>19</sup>
- The government and the Ministry of Social Affairs and Health published visual information on the Health and Social Services reform 2020 on 24 December 2016.<sup>20</sup>
- The service Tutkihankintoja.fi<sup>21</sup>, where state spending information (goods, supplies and services) was made available in visual format was published on 4 September 2017 by the government's central purchasing body.<sup>22</sup>

### *1.5. Webpages Compatible with Assistive Devices*

On 31 January 2017, the Ministry of Finance appointed a working group for the preparation of national implementation of the accessibility directive. The main goals of the directive are to improve the quality of digital services, create a uniform base minimum demands for the accessibility of e-services in the public administration, as well as further equal opportunities for citizens to fully participate in the digital society.<sup>23</sup> At the time of writing the report, there was no evidence of improved accessibility to government websites. The end-of-term self-assessment report states that

preparations are still in progress, thus the commitment's completion level and impact remains limited. The milestone was carried forward to the next action plan.

#### *1.6. Services Easily Found Online*

The new Suomi.fi Web Service has been published and developed since the writing of the midterm report. According to a representative of the Population Register Center (PRC), the service has mostly replaced the old portal, with approximately 600 organizations having joined the databank (including all municipalities and almost all governmental agencies in Finland). The service has gained more than 150,000 unique visitors per month.<sup>24</sup> On 7 September 2017, the Suomi.fi provincial tour set off to spread information about the portal among citizens,<sup>25</sup> which reportedly raised awareness of the service by 10 percentage points.<sup>26</sup> Nevertheless, the commitment to provide the public with access to services online remains aspirational, is not specific enough to measure, and is of unclear relevance to OGP values.

### **Did It Open Government?**

#### **Access to Information: Marginal**

In Finland, many citizens have found government information on how to access and receive public services confusing and difficult to use. This commitment sought to improve the clarity of official documents to enhance service delivery. Article 9 of the Finnish Administrative Procedure Act (Hallintolaki) states that authorities must use professional, clear, and understandable language,<sup>27</sup> thus issues with administrative language had been addressed even before the OGP process. For instance, the Finnish Transport Safety Agency launched a Good Language project in autumn 2014, which aimed to simplify outgoing official correspondence and organize plain language training for staff.<sup>28</sup> According to a representative of the Ministry of Finance, including a commitment to increasing clear administrative language has further strengthened the process as a democracy tool.<sup>29</sup>

This commitment has brought focus to improving understanding of government processes and decision making among citizens, and especially vulnerable groups, such as young persons with disabilities, and migrants. For example, Migri produced visual graphics explaining the process of seeking asylum in Finland,<sup>30</sup> and Kela published print leaflets with information about applying for allowances in plain language.<sup>31</sup> The Suomi.fi Web Service has collected e-government resources under one databank, but it still needs improvement in providing as comprehensive information as municipalities' own websites, as well as in the efficiency of its search function.<sup>32</sup>

In terms of increasing accessibility for all citizens and those with disabilities in particular, the commitment has produced limited results. Several information events on the accessibility directive have been organized during 2017,<sup>33</sup> and the estimated transition period for applying its requirements to government webpages is estimated at around four years.<sup>34</sup> The government's end-of-term self-assessment report does not report on any further progress on this issue.

As projected by Open Knowledge Finland,<sup>35</sup> the growing priority for creating interactive visualizations has been actively addressed in the next action plan. The Tutki Hankintoja service aims at improving Finland's global open data index, and according to a representative from the Ministry of Finance, it has been a groundbreaking and important step toward open access and government transparency.<sup>36</sup>

### **Carried Forward?**

Several aspects of this commitment were carried forward in the third Finnish OGP action plan, such as clarifying government reform and service descriptions (including visualizations), training regional administrations in open government principles, and ensuring knowledge of access to information legislation within the civil servants' network. While the government's commitment to developing the accessibility to information is laudable, the commitment could go further to concretely define ambitious steps for improvement. The IRM researcher strongly advises the government to include specific, measurable solutions for achieving clear language and government processes, such as the

creation of priority lists for clear language materials or the completion of the unified national accessibility standards. Additionally, though the third plan has outlined several aspects of access to information as its focal points, it still lacks clear targets for the type and amount of information to improve, and a system for tracking progress and engaging citizens along the way.

<sup>1</sup> Midterm report, p. 22,

[http://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017\\_for-public-comment.pdf](http://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017_for-public-comment.pdf)

<sup>2</sup> Eero Rämö, former Chairperson of the Board of the Finnish Youth Cooperation – Allianssi, 4 September 2017.

<sup>3</sup> Finland's End-of-term self-assessment report, 2015–2017 (in Finnish), p. 2,

[http://avoinhallinto.fi/assets/files/2017/10/Avoim-hallinto\\_-\\_khoitsearviointiraportti-2017.pdf](http://avoinhallinto.fi/assets/files/2017/10/Avoim-hallinto_-_khoitsearviointiraportti-2017.pdf)

<sup>4</sup> "Survey results on implementation of open government." Avoinhallinto.fi, 14 February 2018,

<https://avoinhallinto.fi/kyselytietoa-avoimen-hallinnon-toimeenpanosta/>

<sup>5</sup> Toimintasuunnitelma strategisen hallitusohjelman kärkihankkeiden ja reformien toimeenpanemiseksi 2015-2019,

<http://valtioneuvosto.fi/documents/10184/321857/Toimintasuunnitelma+strategisen+hallitusohjelman+k%C3%A4rkihankkeiden+ja+reformien+toimeenpanemiseksi+2015%E2%80%932019,+p%C3%A4ivitys+2016/305dcb6c-c9f8-4aca-bbbb-1018cd7a1fd8>

<sup>6</sup> Ratkaisujen Suomi: Puolivälin tarkistus. Hallituksen toimintasuunnitelma vuosille 2017-2019,

[http://vnk.fi/documents/10616/4610410/Toimintasuunnitelma+H\\_5\\_2017+280417.pdf](http://vnk.fi/documents/10616/4610410/Toimintasuunnitelma+H_5_2017+280417.pdf)

<sup>7</sup> "Survey results on implementation of open government." Avoinhallinto.fi, 14 February 2018,

<https://avoinhallinto.fi/assets/files/2018/02/Avoimen-hallinnon-kysely-2017.pdf>

<sup>8</sup> The unofficial group consists of the OGP team, the Institute for the Languages of Finland, the PM's office, the Social Insurance Institution (Kela), the National Center for Plain Language (Selkokeskus), the Union of Journalists, and the Association of Finnish Local and Regional Authorities (Kuntaliitto). Source: Johanna Nurmi, Ministry of Finance, 16 August 2017.

<sup>9</sup> Finland's End-of-term self-assessment report, 2015–2017 (in Finnish), p. 6,

[http://avoinhallinto.fi/assets/files/2017/10/Avoim-hallinto\\_-\\_khoitsearviointiraportti-2017.pdf](http://avoinhallinto.fi/assets/files/2017/10/Avoim-hallinto_-_khoitsearviointiraportti-2017.pdf)

<sup>10</sup> Interview with Johanna Nurmi, Ministry of Finance, 16 August 2017.

<sup>11</sup> Eduskunta: Tielikennelain kokonaisuudistus, 1.12.2017,

[https://www.eduskunta.fi/FI/tietoaeduskunnasta/kirjasto/aineistot/kotimainen\\_oikeus/LATI/Sivut/tieliikennelain-kokonaisuudistus.aspx](https://www.eduskunta.fi/FI/tietoaeduskunnasta/kirjasto/aineistot/kotimainen_oikeus/LATI/Sivut/tieliikennelain-kokonaisuudistus.aspx)

<sup>12</sup> "Kehityspäällikkö Elina Uotila edistää Trafissa hyvää kieltä." Kotus, 2015,

[https://www.kotus.fi/kielitieto/virkakieli/yleista\\_virkakielesta/virkakielityota\\_virastoissa/liikenteen\\_turvallisuusvirasto\\_\(trafi\)](https://www.kotus.fi/kielitieto/virkakieli/yleista_virkakielesta/virkakielityota_virastoissa/liikenteen_turvallisuusvirasto_(trafi))

<sup>13</sup> Kotus: Virkakielityötä virastoissa, [https://www.kotus.fi/kielitieto/virkakieli/yleista\\_virkakielesta/virkakielityota\\_virastoissa](https://www.kotus.fi/kielitieto/virkakieli/yleista_virkakielesta/virkakielityota_virastoissa)

<sup>14</sup> Avoimen hallinnon kokemukortit: "Asiakaslähtöistä, selkeää virkakieltä."

[http://vm.fi/documents/10623/2866950/Avoim+hallinto\\_-\\_kokemukortti\\_selke%C3%A4+virkakieli.pdf/760992d7-d11c-43e7-b318-ac58caac46b8](http://vm.fi/documents/10623/2866950/Avoim+hallinto_-_kokemukortti_selke%C3%A4+virkakieli.pdf/760992d7-d11c-43e7-b318-ac58caac46b8)

<sup>15</sup> Hyvin suunniteltu – puoliksi kirjoitettu. Apuneuvoja tekstintekijälle. Valtioneuvoston kanslian julkaisusarja, 6/2016,

<http://verkkojulkaisut.vm.fi/zine/92/cover>

<sup>16</sup> Open Government Support Package, <http://avoinhallinto.fi/tukipaketti/>

<sup>17</sup> Examine the Budget service, <http://www.tutkibudjettia.fi/>

<sup>18</sup> Interview with Virpi Einola-Pekkinen, Ministry of Finance, 8 December 2017.

<http://kaikkienbudjetti.fi/>

<sup>20</sup> Health and Social Services reform, <http://alueuudistus.fi/en/what-is-the-health-and-social-services-reform->

<https://tutkihankintoja.fi/>

<sup>22</sup> Hansel Ltd., <https://www.hansel.fi/en/>

<sup>23</sup> The accessibility directive, <http://vm.fi/saavutettavuusdirektiivi>

<sup>24</sup> Interview with Marko Latvanen, Population Register Center, 15 December 2017.

<sup>25</sup> The Suomi.fi provincial tour, [https://twitter.com/VM\\_MariaNikkila/status/90573000397238274](https://twitter.com/VM_MariaNikkila/status/90573000397238274)

<sup>26</sup> A survey was conducted to measure awareness about Suomi.fi in May-June 2017 and again in November 2017 (after the provincial tour). Awareness is now at 44 percent. Interview with Marko Latvanen, Population Register Center, 15 December 2017.

<sup>27</sup> Hallintolaki 6.6.2003/434, <https://www.finlex.fi/fi/laki/ajantasa/2003/20030434>

<sup>28</sup> "Kehityspäällikkö Elina Uotila edistää Trafissa hyvää kieltä." Kotus, September 2015,

[https://www.kotus.fi/kielitieto/virkakieli/yleista\\_virkakielesta/virkakielityota\\_virastoissa/liikenteen\\_turvallisuusvirasto\\_\(trafi\)](https://www.kotus.fi/kielitieto/virkakieli/yleista_virkakielesta/virkakielityota_virastoissa/liikenteen_turvallisuusvirasto_(trafi))

<sup>29</sup> Interview with Johanna Nurmi, Ministry of Finance, 16 August 2017,

"Miten yhdenvertaisuus saavutetaan digipalveluissa? Saavutettavuusdirektiivi." Markus Rahkola, Ministry of Finance, 30 May 2017, <http://vm.fi/documents/10623/4871483/Saavutettavuusdirektiivi+yhteisseminaarissa/4ae299a3-2408-4ef2-8f3f-ebdc782dfde5>

<sup>30</sup> Migri: Applying for asylum, [http://www.migri.fi/asylum\\_in\\_finland/applying\\_for\\_asylum](http://www.migri.fi/asylum_in_finland/applying_for_asylum)

<sup>31</sup> "Selkoesitteet ovat osa hyvää asiakaspalvelua." Kotus, 2015,

[https://www.kotus.fi/kielitieto/virkakieli/yleista\\_virkakielesta/virkakielityota\\_virastoissa/kela/selkoesitteet](https://www.kotus.fi/kielitieto/virkakieli/yleista_virkakielesta/virkakielityota_virastoissa/kela/selkoesitteet)

<sup>32</sup> Interview with Marko Latvanen, Population Register Center, 15 December 2017.

<sup>33</sup> "Saavutettavuusdirektiivin valmistelu etenee, ilmoittaudu mukaan infotilaisuuksiin." Saavutettava.fi, 17 May 2017,

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<http://saavutettava.fi/2017/05/17/saavutettavuusdirektiivin-valmistelu-etenee-ilmoittaudu-mukaan-infotilaisuuksiin/>

<sup>34</sup> Finland's End-of-term self-assessment report, 2015–2017 (in Finnish), p. 5,

[http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto\\_khoitsearviointiraportti-2017.pdf](http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto_khoitsearviointiraportti-2017.pdf)

<sup>35</sup> Midterm report, p. 23, [http://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017\\_for-public-comment.pdf](http://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017_for-public-comment.pdf)

<sup>36</sup> "Finland is one of the pioneering countries that publicize state procurement information on such a scale." Anu Vehviläinen, Ministry of Finance, 4 September 2017, [http://vm.fi/artikkeli/-/asset\\_publisher/mita-valtio-hankkii-ja-kenelta-](http://vm.fi/artikkeli/-/asset_publisher/mita-valtio-hankkii-ja-kenelta-)

## **Commitment 2. Government as enabler**

### **Commitment Text:**

#### **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:**

*2.1 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 25 is set. Results are published and follow-up is organized.*

*2.2. 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.*

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

- 2.4. Drafted proposals of removing the barriers of voluntary work and analysis of their impact.
- 2.5. 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.
- 2.6. Citizens have access to e-services also in rural areas.
- 2.7. 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.
- 2.8. CSOs and citizens organizing voluntary work have an easy access to information they need for this.
- 2.9. 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 July 2015

End Date: 30 June 2017

Commitment Overview	Specificity				OGP Value Relevance				Potential Impact				Completion		Midterm	Did It Open Government?							
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial		Completed	End-of-Term					
2. Overall		✓			✓	✓		✓		✓					✓			Worsened	Did Not Change	✓	Marginal	Major	Outstanding

### Commitment Aim:

Broadly speaking, the targets of this commitment have been to improve citizens' access to information and participation in decision making through e-participation tools. More specifically, the commitment aims to open, centralize and digitize government data and services; enhance government support for voluntary work and update voluntary work information; and improve e-participation practices and tools, as well as access to e-services in rural areas.

### Status

#### Midterm: Substantial

At the midterm, the second commitment was substantially implemented. As part of the Ministry of Finance's Open Data Program, the government had published a guide for opening data, as well as launched the online service platform for open data and interoperability tools *Avoindata.fi*, and the *Suomi.fi* Web Service for e-services and public records. However, priority datasets for future publication on *Avoindata.fi* were not determined at the midterm. On 14 October 2015, a report on the barriers of voluntary work was published.<sup>1</sup> Officials had yet to develop guidelines for voluntary work, and activities to improve access to e-participation tools for citizens in rural areas and for special needs groups had not started. The commitment involved several campaigns to raise awareness about e-participation services, including the e-participation portal for youth *Nuortenideat.fi*, the consultation portal *Lausuntopalvelu.fi*, and the public feedback portal *Otakantaa.fi*.

## **End-of-term: Substantial**

### *2.1. Procedures to open datasets*

At the end of term, progress on this step is still incomplete. The Open Data service saw a monthly average of 32,000 page views in 2016,<sup>2</sup> but priority datasets for publication are yet to be determined. Excluding public procurement data, information on the publication of data reserves considered important in the commitment (companies' and corporations' data, notifications on forest usage, decisions on use of forest owned by government, environmental impact assessments, agencies' plans to open data and other central data reserves) is unavailable.

### *2.2. Personal records service*

This step is substantially implemented. All Finnish municipalities and most government agencies have joined the personal records service as obliged by the joint government electronic support service law that came into force on 15 July 2016.<sup>3</sup> Suomi.fi is still in beta testing in terms of private sector services.<sup>4</sup>

### *2.3. Proposal for coordinating voluntary work and 2.4 Proposals for removing barriers of voluntary work*

This milestone is complete. Based on the report on barriers of voluntary work, focus was brought to the issue of persons granted unemployment benefits when involved in voluntary work.<sup>5</sup> Under Finnish law, such persons are eligible for benefits as long as the work in question is by definition voluntary, i.e. unpaid, even if it includes certain benefits, such as refundable travel expenses or free meals.<sup>6</sup>

The guidelines for voluntary work have been developed by the Ministry of Justice and published on the new Suomi.fi Web Service.<sup>7</sup> According to a representative of the Ministry of Education and Culture, the publication principles of the portal (e.g. using layman's terminology and presenting matters concisely) meant that certain detailed information about volunteer work could not be transferred from Demokratia.fi,<sup>8</sup> which therefore still contains the more comprehensive guidelines for volunteer work. According to a representative of Allianssi, the commitment has succeeded in removing municipal barriers to voluntary work.<sup>9</sup> As stated in the midterm report, promoting and creating simple processes for engaging volunteer work is laudable but of unclear relevance to OGP values.

*2.5 E-participation practice; 2.7 E-participation tools used; and 2.8 Access to information for voluntary work*  
According to a representative of the Ministry of Justice, the popularity of most Demokratia.fi services has declined or remained roughly the same since the midterm. In the case of Kansalaisaloite.fi (Citizen Initiative), the decline in webpage visits could be explained by the lack of big campaigns in 2017. The only growing e-participation service is Lausuntopalvelu.fi (Consultation Portal), which had already acquired 45,000 visits by August 2017 (compared to 29,700 in total in 2016). The Ministry of Justice was intending to use this portal for all consultations from the end of 2017.<sup>10</sup> Usage statistics for 2017 were not updated in the government's end-of-term self-assessment report.

In total, 87 organizations have joined the portal Nuortenideat.fi, including municipalities, NGOs, schools and educational institutions, as well as projects and forums. Ideas proposed by users are picked up by organizations and brought forward. According to a representative of the Youth Information and Counseling service Koordinaatti,<sup>11</sup> organizations joining the portal commit to the service terms, which state that each joining organization should appoint at least one responsible contact person to respond to young people's ideas and forward them for review. The portal is also monitored, but the efficiency of responses currently varies and depends on each organization's internal processes, their commitment level, as well as the responsible contact person. During 2017, 716 ideas were published, 216 were forwarded for review, 405 ideas received responses and 90 ideas are still awaiting response. The portal requires those submitting new ideas to log in, but supporting and commenting on existing ideas can be done without registration.<sup>12</sup>

### *2.6 Access to e-services in rural areas*

The government's self-assessment report does not outline any implemented practices for increasing participation of special needs groups in rural areas, in addition to Demokratia.fi. As part of the

“Broadband for All” initiative, an estimated 32,000 kilometers of broadband network were built, which provided fast broadband for 15,000 new subscribers in 2015.<sup>13</sup>

### **Did It Open Government?**

#### **Access to Information: Marginal**

#### **Civic Participation: Marginal**

Although Finland rates in the top 10 countries for the Open-Useful-Reusable Government Data Index, it is also the only Nordic country which has suffered 20 percent loss of trust in national government since 2007. In terms of access to information, the publication of state spending information<sup>14</sup> under this commitment (milestone 2.1) meets global standards for being a “three-star step in open data design.”<sup>15</sup> However, there is room for improvement in terms of involvement of citizens in the policy cycle for collaborative and empowering public participation.<sup>16</sup> This commitment aims to involve citizens directly by providing online information platforms as well as platforms for public consultation. The commitment covers topics of availability, access and readability for the following data:

- public records and several e-services;
- open government, municipal and agency data;
- information on voluntary work; and
- several civic participation tools.

Nevertheless, decreasing usage statistics of the Demokratia.fi services show that making information and participation opportunities available does not automatically result in increased civic participation.<sup>17</sup> The “Broadband for All” initiative continued under the name “Fast Broadband”, but its aim has been redefined to provide services to regions lacking commercial activities,<sup>18</sup> and its relevance to OGP values is unclear as it remains a government infrastructure project. The commitment also lacks measurable follow-up steps for involving citizens in co-creation and impact evaluation, and the planned operational models for engaging special needs groups and people living in rural areas have not been created.<sup>19</sup>

The commitment has succeeded in providing the public with a variety of e-participation services, some of which have gained popularity and enhanced open government values. According to a representative of Allianssi, the consultation portal Lausuntopalvelu.fi has increased transparency,<sup>20</sup> and as stated in the midterm report, the commitment has made progress in improving government practice in drafting legislation by facilitating public commentary on laws, policies and guidelines.<sup>21</sup> According to a representative of Koordinaatti, transparency as well as civic participation opportunities for young people also increased through the portal Nuortenideat.fi, though the representative also added that the existence of the service does not guarantee participation.<sup>22</sup>

### **Carried Forward?**

The commitment was partially carried over to the next action plan,<sup>23</sup> in which Finland aims to ensure equal participation opportunities for all citizens as well as continue working on open procedures and open data. One of the focal points of the new commitment is the publication of state procurement data. The latter had already been published at the time of writing the report,<sup>24</sup> and the third action plan commitment did not include any additional milestones for state procurement data or open data in general. Another focal point of the third action plan is the consultation portal Lausuntopalvelu.fi, the use of which in state, regional and municipal administration is planned to be increased.

Overall, the third action plan still mostly serves civil servants<sup>25</sup> and lacks measures for public accountability. In order to further improve civic participation for this commitment, the researcher advises that the government consider committing to concrete steps on engaging the public in consultation, as well as producing guidelines on how consultations should be considered and implemented, specifically in terms of using feedback from CSOs. Currently, the commitment fails to incorporate diverse perspectives of CSOs from outside the usual OGP support groups and networks.<sup>26</sup> Specifically, more engagement-oriented strategies for consultation with special needs groups and people living in rural areas are needed.



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- <sup>1</sup> "Vapaaehtoistyö, talkootyö, naapuriapu – kaikki käy." Ministry of Finance, 14 October 2015, [http://vm.fi/artikkeli/-/asset\\_publisher/vapaaehtoistyö-talkootyö-naapuriapu-kaikki-käy](http://vm.fi/artikkeli/-/asset_publisher/vapaaehtoistyö-talkootyö-naapuriapu-kaikki-käy)
- <sup>2</sup> Avoindata.fi usage statistics, <https://www.avoindata.fi/fi/content/tilastot>
- <sup>3</sup> KaPa-laki 571/2016, <http://vm.fi/kapa-laki>
- <sup>4</sup> Suomi.fi beta testing, <https://beta.suomi.fi/yritykselle>
- <sup>5</sup> "Vapaaehtoistoimintaan liittyvistä verotuskysymyksistä lausuntokierroksella eniten palautetta." Ministry of Finance, 2 March 2016, [http://valtioneuvosto.fi/artikkeli/-/asset\\_publisher/vapaaehtoistoimintaan-liittyvista-verotuskysymyksista-lausuntokierroksella-eniten-palautetta?\\_101\\_INSTANCE\\_3wyslLo1Z0ni\\_groupId=10623](http://valtioneuvosto.fi/artikkeli/-/asset_publisher/vapaaehtoistoimintaan-liittyvista-verotuskysymyksista-lausuntokierroksella-eniten-palautetta?_101_INSTANCE_3wyslLo1Z0ni_groupId=10623)
- <sup>6</sup> Benefits for voluntary work, <http://www.demokratia.fi/tietotori/vapaaehtoistyö/tyottoman-oikeus-tehda-vapaaehtoistyötä/>
- <sup>7</sup> Fundamental rights and civic activity (in Finnish), <https://www.suomi.fi/kansalaiselle/oikeudet-ja-velvollisuudet/perusoikeudet-ja-vaikuttaminen>
- <sup>8</sup> Interview with Niklas Wilhelmsson, Ministry of Justice, 20 December 2017.
- <sup>9</sup> Interview with Eero Rämö, Allianssi, 4 September 2017.
- <sup>10</sup> Interview with Niklas Wilhelmsson, Ministry of Justice, 29 August 2017.
- <sup>11</sup> Koordinaatti is one of the service providers for Nuortenideat.fi, together with the Ministry of Education and Culture, Ministry of Justice, and the Legal Register Center.
- <sup>12</sup> Interview with Merja-Maaria Oinas, Koordinaatti, 17 January 2018.
- <sup>13</sup> Finland's End-of-term self-assessment report, 2015–2017 (in Finnish), 8-9, [http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto\\_-\\_khoitsearviointiraportti-2017.pdf](http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto_-_khoitsearviointiraportti-2017.pdf)
- <sup>14</sup> Government agencies' purchase invoices open data, Hansel Ltd, <https://www.avoindata.fi/data/fi/dataset/valtion-virastojen-ostolaskut>
- <sup>15</sup> "Julkiset, avoimet hankinnat." Hansel blog, 30 November 2017, <https://www.hansel.fi/blogi/2017/11/29/julkiset-avoimet-hankinnat/>
- <sup>16</sup> OECD: Government at a Glance 2017, [http://dx.doi.org/10.1787/gov\\_glance-2017-en](http://dx.doi.org/10.1787/gov_glance-2017-en)
- <sup>17</sup> Midterm report, p. 30, [http://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017\\_for-public-comment.pdf](http://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017_for-public-comment.pdf)
- <sup>18</sup> Nopea laajakaista -hanke tukee huippunopeiden verkkojen rakentamista. FICORA, 10 October 2017, <https://www.viestintavirasto.fi/ohjausjavalvonta/nopealaajakaista.html>
- <sup>19</sup> Finland's End-of-term self-assessment report, 2015–2017 (in Finnish), p. 7, [http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto\\_-\\_khoitsearviointiraportti-2017.pdf](http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto_-_khoitsearviointiraportti-2017.pdf)
- <sup>20</sup> Interview with Eero Rämö, Allianssi, 4 September 2017.
- <sup>21</sup> Midterm report, p. 29, [http://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017\\_for-public-comment.pdf](http://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017_for-public-comment.pdf)
- <sup>22</sup> Interview with Merja-Maaria Oinas, Koordinaatti, 17 January 2018.
- <sup>23</sup> The Finnish Open Government III Action Plan, p. 4, [https://www.opengovpartnership.org/sites/default/files/Finland\\_NAP\\_2017-2019\\_EN.pdf](https://www.opengovpartnership.org/sites/default/files/Finland_NAP_2017-2019_EN.pdf)
- <sup>24</sup> "Hankintahackathonin taikaa." Hansel blog, 18 December 2017, <https://www.hansel.fi/blogi/2017/12/18/hankintahackathonin-taikaa/>
- <sup>25</sup> Finland's End-of-term self-assessment report, 2015–2017 (in Finnish), p. 9, [http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto\\_-\\_khoitsearviointiraportti-2017.pdf](http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto_-_khoitsearviointiraportti-2017.pdf)
- <sup>26</sup> Midterm report, p. 15, [http://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017\\_for-public-comment.pdf](http://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017_for-public-comment.pdf)

## **Commitment 3. Open procedures**

### **Commitment Text:**

#### **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.<sup>1</sup>*

#### **Main objective**

Opening the government procedures.

#### **Milestones:**

3.1. 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.

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

3.3. Instructions for legislative drafting have been updated.

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

3.5 Government is active in social media.<sup>2</sup>

3.6. 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.

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

3.8. 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 organizations, and employer and employee organizations.

Start Date: 1 July 2015

End Date: 30 June 2017

Commitment Overview	Specificity				OGP Value Relevance				Potential Impact				Completion		Midterm	Did It Open Government?						
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial		Completed	End-of-Term				
3. Overall			✓		✓	✓		✓		✓				✓				Worsened	Did Not Change	✓	Major	Outstanding

### Commitment Aim:

The commitment aims to increase government transparency and improve citizens' trust in government by opening decision-making procedures to the public for monitoring. The commitment includes applying and distributing information on open government principles, publishing information on public projects, as well as making the government more visible on social media. Additionally, the government aimed to assess the need for a lobbying register.

### Status

#### Midterm: Limited

At the midterm, plans had been made to replace the joint project register (HARE) for ministries and Parliament with an updated website for public project information called "Valtioneuvoston hankeikkuna" by March 2017. The updated instructions for drafting legislation were approved by the government on 4 February 2016, and guidelines for their use were published online.<sup>3</sup> All public consultation on policy making was to eventually take place online at the consultation portal Lausuntopalvelu.fi. The needs assessment for an open-data lobbying register was delayed by the lack of a leading unit within the government. In the self-assessment report, the government reported planning wider involvement with anti-corruption work but did not include any specifications. Several of the milestones (3.1, 3.7 and 3.8) were of unclear relevance to OGP values. For more information, see the midterm Progress Report.

#### End-of-term: Substantial

3.1. Project register opened and used and 3.2. HARE is well known:

The new online register for public projects, “Valtioneuvoston hankeikkuna,” was available to civil servants in January 2017,<sup>4</sup> and opened to the public in June 2017. The end-of-term self-assessment report states that training for civil servants in using the “hankeikkuna” was organized, and the register was publicized extensively internally and externally.<sup>5</sup> The Prime Minister’s Office reported having conducted a tour focused on digitalization and system reforms in 2016–2017, as well as presented the register to the ministries.<sup>6</sup> Although occurring after the commitment implementation period, as of December 2017 242 new projects have been published on “Valtioneuvoston hankeikkuna”, and 11,340 log-ins have been made by ministry civil servants.<sup>7</sup> This was an inward-facing reform, and of unclear relevance to OGP.

### 3.3. Updating instructions for legislative drafting

The instructions for legislative drafting were updated on 30 June 2016.<sup>8</sup> According to a representative of the Ministry of Justice, most ministries are actively using the consultation portal [Lausuntopalvelu.fi](http://Lausuntopalvelu.fi).<sup>9</sup> This was an inward-facing reform that lacked a public element and was of unclear relevance to OGP values.

### 3.4 and 3.5. Increasing webcasts and social media use

The government reported the need to find more economical tools for producing webcasts. The Ministry of Finance’s OGP team has evaluated that the commitment to increase webcasts was not prioritized by the government.<sup>10</sup> The Civil Servants Network intended to review best practices for using online tools and publish experience cards highlighting the key findings in the autumn of 2016,<sup>11</sup> but the IRM researcher found no evidence this step had been carried out.

Out of six ministry Twitter accounts investigated by the researcher in November 2017,<sup>12</sup> four had between 12,000 and 21,000 followers. The most popular account was that of the Ministry of Foreign Affairs, with more than 78,000 followers. Comparatively, one of the commitment’s responsible institutions, the Ministry of Justice, had just over 5,000 followers.<sup>13</sup> According to a representative of the Ministry of Finance, monitoring of the ministries’ social media usage is not centralized, but performed in each ministry separately.<sup>14</sup>

### 3.6. Assessing need for lobbying register

This step was incomplete at the conclusion of the implementation period in July 2017. On 2 October 2017, the Prime Minister’s Office opened a call for analysis, assessment and research activities supporting the government’s decision making. The call was based on the *Analysis, Assessment and Research Plan of 2018*, which includes international comparative research on lobbying registers and their implementation as one of its themes.<sup>15</sup> The call ended after the implementation period, on 9 November 2017,<sup>16</sup> by which date six comparative lobbying register study proposals had been sent in.<sup>17</sup> The “International Models of Lobbying Registers” comparative research project led by the University of Eastern Finland launched on 8 February 2018.<sup>18</sup> The government reported no additional anti-corruption measures in the end-of-term self-assessment report.

Open government principles, values, legal basis and a checklist for civil servants were published in the form of concise information cards called the Open Government Support Package.<sup>19</sup> According to the government’s self-assessment report, a survey on the realization of open government objectives was conducted in September 2017. The survey results suggest that open government principles have been diversely and broadly presented within agencies.<sup>20</sup> However, results and findings from these activities are limited and occur beyond the period assessed.

## Did It Open Government?

**Access to Information: Marginal**  
**Civic Participation: Did Not Change**

Although Finland ranks third on Transparency International’s Corruption Perceptions Index 2016,<sup>21</sup> corruption scandals have shaken citizens’ perception of government integrity, and there is room for improvement among the corporate social responsibility measures of the government’s administration.<sup>22</sup> Finland is also currently one of five OECD countries without an institution

responsible for design of integrity system policies.<sup>23</sup> The commitment could do more in terms of monitoring campaign financing and anti-corruption ethics,<sup>24</sup> but it has included a specific and measurable milestone for tackling the opaqueness of political influencing in Finland. A representative of Open Ministry has stated that the lobbying register would increase trust in the political system as well as support participation in decision making.<sup>25</sup> However, in spite of the large-scale media discussion on the topic, as well as wide-spread support for the commitment among lobbyists and communications specialists,<sup>26</sup> the “Make lobbying transparent” citizens’ initiative, launched by Open Knowledge Finland, Open Ministry, and Transparency Finland, has collected less than 6,000 signatures at the time of writing.<sup>27</sup> Additionally, a CSO has publicly voiced a concern that the lobbying register could potentially create a market for increasingly specialized lobbyists, which would in turn concentrate influencing power to large organizations and media agencies, and raise administrative barriers for the influencing possibilities of small CSOs as well as citizens.<sup>28</sup>

Transparency issues are also addressed in the commitment’s aim to publish government undertakings on “Valtioneuvoston hankeikkuna.” The transparency of the register as well as the scale of access of information it provides to the public are significantly decreased by the possibility that projects will only be published internally<sup>29</sup>—an issue also highlighted by a representative of Allianssi.<sup>30</sup> A representative of the Prime Minister’s Office remarked that internal publication is monitored by quality controllers as well as implemented in the project planning phase in accordance with the Openness of Government Activities Act, which provides a loophole in which unfinished documents need not be published.<sup>31</sup> The commitment could go further in terms of providing the public with a platform to not simply follow the decision-making process, but to directly comment, consult and participate in it.

Increasing the government’s visibility on social media has succeeded to varying degrees in different ministries, but the commitment merely aims to use it without a clear strategy on best practices for providing the public with information, engaging citizens, and/or increasing accountability.

### **Carried Forward?**

With the exception of the assessment of the lobbying register, the Open Procedures commitments have not been carried forward to the next action plan. The IRM researcher recommends adding information on project impact and results evaluation to the project register, in order to improve on the commitment to transparency.<sup>32</sup> As recommended in the midterm report, clear procedures of incorporating public consultation results should also be established within the legislative drafting process.<sup>33</sup> The researcher also advises the government to continue developing suitable methods for efficiently producing webcasts as well as to create a strategy for utilizing social media as a public transparency and accountability tool.

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<sup>1</sup> Valtion virkamiesseettisen toimikunnan raportti VM 3/2014, [http://vm.fi/documents/10623/1107479/Valtion\\_virkamiesseettisen\\_toimikunnan\\_raportti\\_3\\_2014.pdf/ab866e15-a9af-456d-aca4-99b7b1c2e340](http://vm.fi/documents/10623/1107479/Valtion_virkamiesseettisen_toimikunnan_raportti_3_2014.pdf/ab866e15-a9af-456d-aca4-99b7b1c2e340).

<sup>2</sup> 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.

<sup>3</sup> Säädosvalmistelun kuulemisopas, <http://kuulemisopas.finlex.fi/>

<sup>4</sup> Interview with Päivi Nurminen, the Prime Minister’s Office, 11 January 2018.

<sup>5</sup> Finland’s End-of-term self-assessment report, 2015–2017 (in Finnish), p. 9, [http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto\\_-khoitsearviointiraportti-2017.pdf](http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto_-khoitsearviointiraportti-2017.pdf)

<sup>6</sup> Interview with Päivi Nurminen, the Prime Minister’s Office, 11 January 2018.

<sup>7</sup> Statistics beginning on 9 January 2017. Interview with Päivi Nurminen, the Prime Minister’s Office, 11 January 2018.

<sup>8</sup> Instructions for legislative drafting, <http://kuulemisopas.finlex.fi/>

<sup>9</sup> Interview with Niklas Wilhelmsson, Ministry of Justice, 20 December 2017.

<sup>10</sup> Midterm report, p. 35,

[https://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017.pdf](https://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017.pdf)

<sup>11</sup> Ibid.

<sup>12</sup> Ministries of Justice, Education and Culture, Foreign Affairs, Defence, Economic Affairs and Employment, and Social Affairs and Health. Follower statistics compared by using the Wayback Machine, <https://archive.org/web/>

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- <sup>13</sup> Ministry of Foreign Affairs on Twitter, <https://twitter.com/Ulkoministerio>; Ministry of Justice on Twitter <https://twitter.com/oikeusmin>. Twitter followers checked using the WayBack Machine, <https://archive.org/web/>
- <sup>14</sup> Interview with Katju Holkeri, Ministry of Finance, 16 January 2018.
- <sup>15</sup> Valtioneuvoston päätöksentekoa tukeva selvitys- ja tutkimussuunnitelma 2018, p. 4, <http://tietokayttoon.fi/documents/1927382/5351063/Valtioneuvoston+p%C3%A4%C3%A4t%C3%B6ksentekoa+tukeva+selvitys-+ja+tutkimussuunnitelma+2018+p%C3%A4%C3%A4t%C3%B6sesitys.pdf/da762be7-abc8-4305-8493-733787e0be71>
- <sup>16</sup> The call for funding for analysis, assessment and research activities, [http://tietokayttoon.fi/haku/ ilmoitus/-/asset\\_publisher/valtioneuvoston-paatöksentekoa-tukevan-selvitys-ja-tutkimustoiminnan-haku-2018](http://tietokayttoon.fi/haku/ ilmoitus/-/asset_publisher/valtioneuvoston-paatöksentekoa-tukevan-selvitys-ja-tutkimustoiminnan-haku-2018)
- <sup>17</sup> Valtioneuvoston selvitys- ja tutkimustoiminnan hakemusmäärät teemoittain haku 2018, p. 3, <http://tietokayttoon.fi/documents/1927382/5387078/Hakemus%C3%A4%C3%A4r%C3%A4t+painopistealueittain+VN+TEA+S+-haku+2018.pdf/2bcb341e-09dc-47e4-a87a-c2db8be57d69>
- <sup>18</sup> Twitter post by Katju Holkeri, Ministry of Finance, 8 February 2018, <https://twitter.com/HoKatju/status/961546549112295424>
- <sup>19</sup> Avoimen hallinnon tukipaketti, [http://vm.fi/documents/10623/1193298/Avoimen+hallinnon+tukipaketti\\_RGB\\_web\\_17052017.pdf/f0bc4b85-0894-460d-8f2b-c407f243c6dc](http://vm.fi/documents/10623/1193298/Avoimen+hallinnon+tukipaketti_RGB_web_17052017.pdf/f0bc4b85-0894-460d-8f2b-c407f243c6dc)
- <sup>20</sup> Finland's End-of-term self-assessment report, 2015–2017 (in Finnish), p. 2, [http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto\\_-khoitsearviointiraportti-2017.pdf](http://avoinhallinto.fi/assets/files/2017/10/Avoin-hallinto_-khoitsearviointiraportti-2017.pdf)
- <sup>21</sup> Transparency International's Corruption Perceptions Index 2016, [https://www.transparency.org/news/feature/corruption\\_perceptions\\_index\\_2016](https://www.transparency.org/news/feature/corruption_perceptions_index_2016)
- <sup>22</sup> Midterm report (in Finnish), p. 45, [https://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017.pdf](https://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017.pdf)
- <sup>23</sup> OECD: Government at a Glance 2017, [http://dx.doi.org/10.1787/gov\\_glance-2017-en](http://dx.doi.org/10.1787/gov_glance-2017-en)
- <sup>24</sup> Midterm report (in Finnish), p. 45, [https://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017.pdf](https://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017.pdf)
- <sup>25</sup> Open Knowledge Finland press release, 14 October 2017, <https://fi.okfn.org/2017/10/14/kiista-eduskunnan-vierailijatiedoista-kirvoitti-lobbaus-lapinakyvaksi-kansalaisaloitteen/>
- <sup>26</sup> ProCom – The Finnish Association of Communication Professionals' voluntary lobbying register, <http://procom.fi/procom/lobbarirekisteri/selaa-rekisterin-tietoja/>
- <sup>27</sup> An initiative is delivered to Parliament for consideration if it gains 50,000 or more signatures. Lobbaus läpinäkyväksi – kansalaisaloite. 12 October 2017, <https://www.kansalaisaloite.fi/fi/aloite/2653>
- <sup>28</sup> Comment by SOSTE Finnish Federation for Social Affairs and Health on the first consultation round for the II. action plan, p. 17, <http://vm.fi/documents/10623/1332423/Lausuntojen+huomiointi+avoimen+hallinnon+toimintasuunnitelma.pdf/ef7a5b7a-6f27-4f91-82e9-962af8f24793>
- <sup>29</sup> "Hankeikkuna" steering group meeting minutes, 20 June 2017, [https://api.hankeikkuna.fi/asiakirjat/69921653-d558-48a4-8365-abfbcdf7aaa0/77c2f5b8-0f1b-4cc1-bf07-ee98bbb72701/POYTAKIRJA\\_20170904063623.pdf](https://api.hankeikkuna.fi/asiakirjat/69921653-d558-48a4-8365-abfbcdf7aaa0/77c2f5b8-0f1b-4cc1-bf07-ee98bbb72701/POYTAKIRJA_20170904063623.pdf)
- <sup>30</sup> Interview with Eero Rämö, Allianssi, 4 September 2017.
- <sup>31</sup> With the exception of certain information on law reforms and generally important issues. Laki viranomaisten toiminnan julkisuudesta, 21.5.1999/621, <https://www.finlex.fi/fi/laki/ajantasa/1999/19990621#L5>
- <sup>32</sup> Interview with Päivi Nurminen, the Prime Minister's Office, 11 January 2018.
- <sup>33</sup> Midterm report, p. 36, [https://www.opengovpartnership.org/sites/default/files/Finland\\_Progress-Report\\_2015-2017.pdf](https://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017.pdf)

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

### **Commitment Text:**

*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 be 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**

- 4.1. 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.*
- 4.2. 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.*
- 4.3. 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.*
- 4.4. A joint participation camp for the elderly, the youth and children is organized. Also civil servants from state government and municipalities will be present.*
- 4.5. In co-operation with Youth network a study on engagement of children and the youth will be made.*

Responsible Institution(s): 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 July 2015

End Date: 30 June 2017





According to a representative of the Ministry of Education and Culture, VANUPO was developed by consulting youth organizations, youth workers and young people in general. Consultation was arranged by conducting a survey, which received 107 responses (38 of which were given by young persons, and the rest by youth workers), as well as organizing a discussion event on 12 September 2016. Consultation opportunities for the program were advertised on social media, such as Twitter and Facebook, as well as on the radio station Radio Suomi.<sup>4</sup>

#### *4.2. Advice on engaging different age groups*

In terms of trainings on engagement with different age groups, a representative of the Ministry of Education and Culture reported that several projects led by youth council unions and youth service organization Nuorten Keski-Suomi were funded to organize local trainings to civil servants.<sup>5</sup> Nuorten Keski-Suomi also reported that funding has been granted to five counties in the new Finnish regional government<sup>6</sup> to pilot projects for enhancing county-wide youth participation. Within these projects, county officials will work together with local youth to find suitable models for inclusion and participation.<sup>7</sup> Information cards on methods of engagement for children and youth are available online.<sup>8</sup> Experience cards on elderly participation events are also available, however, information cards on consultations with the elderly have not been published as planned.<sup>9</sup>

#### *4.3. Experimentation of engagement methods*

After the midterm, engagement with different age groups was experimented with at several events. On 16 November 2015, the Ministry of Finance, together with the Ombudsman for Children's Office, Mannerheim League for Children Welfare, and the Ministry of Education and Culture, organized an "Afternoon of Children's Rights". At the event, speakers of the aforementioned organizations elaborated on children's rights as part of the Open Government initiative, consultation methods with children, and methods of evaluating effects on children in governmental and municipal decision making. According to the end-of-term self-assessment report, the event was a success and was thus repeated on 8 November 2016,<sup>10</sup> and 14 November 2017.<sup>11</sup>

An "Elderly Council Day" was organized on 5 April 2017 jointly by the Ministry of the Environment and the Ministry of Finance. Presentations at the event touched on municipal activities, housing support and development of living environments for the elderly, as well as the role and tasks of elderly councils in these issues. In addition to representatives of the organizing ministries, presentations were held by representatives of Valli ry—The Finnish Union for Senior Services, the Age Institute, the Power of Old Age Network (Valtaa vanhuus), Aalto University, the Research Institute for Health Care Facilities (Sotera), and elderly council members.<sup>12</sup>

#### *4.4. Participation camp*

The participation camp for youth and the elderly was organized in Hollola on 27 April 2017 by the Ministry of Finance and independent think tank Demos Helsinki. Participants consisted of eight young persons, 15 elderly persons, and one public servant of the Hollola municipality. The aim of the camp was to pilot a method of inclusive participation and an administrative tool. The theme of the camp was "good and safe old age in the future."<sup>13</sup>

#### *4.5. Engagement study*

The milestone was complete at the midterm. For more information, please see the IRM progress report.

## **Did It Open Government?**

### **Civic Participation: Marginal**

Research shows that knowledge of government among Finnish youth is high, but interest in social affairs and political participation is low.<sup>14</sup> Additionally, regular school surveys conducted in Finland by the National Institute for Health and Welfare's show that 21 percent of eighth and ninth graders feel they cannot express their opinion in school (2015), and youth with disability experience less participation than others (2017).<sup>15</sup> In the government administration, and specifically in legislative drafting, engagement of children, youth and elderly has also been limited.<sup>16</sup> This commitment addresses the need for participation of different age groups in Finland by experimenting with engagement and consultation methods, and documenting best practices.

The overall impact of the fourth commitment on opening government was evaluated as limited by a representative of Allianssi due to its disconnected milestone experiments and lack of follow-up steps.<sup>17</sup> However, it has been successful in spurring on some changes in government policy. The most important modification to the Youth Act states that government authorities (in addition to municipalities) are obliged to offer participation opportunities to young persons, and influence or otherwise consult in local, regional and national youth work and policy matters, as well as any matters concerning the youth directly.<sup>18</sup> However, a representative of the Ministry of Education and Culture was unsure of the specific and practical application of the legislation.<sup>19</sup> According to a representative of the Ministry of Finance, defining the specific terms for all youth consultation in legislature is not advisable due to changing circumstances; the representative argued that such specifications could potentially be damaging to the aim of the initiative. This issue reportedly divided opinions during law drafting.<sup>20</sup> It seems clear that moving forward, follow-up discussions and planning on how to operationalize the law in practice will be necessary for ensuring legislative requirements to engage youth are acted upon.

Modeled after the EU Youth Strategy, the VANUPO program (previously LANUKE) supports transparency of political decision making as well as aiming to clarify government processes. VANUPO has been an ongoing initiative of the government since 2007, and—in light of the aforementioned secondary school survey results—is an important Decision-in-Principle in terms of bringing attention to youth participation and equal opportunities.<sup>21</sup> However, in its current form, VANUPO has been criticized by child and family associations for not including in the implementation of the program as a whole the consultation of children, child groups and experts by experience, in addition to representative participation.<sup>22</sup>

The Ministry of Education and Culture opened some new avenues for civic participation by soliciting public input when creating new guidelines on engaging children and youth. A representative of the Ministry considered the development of the guidelines a prime example of participation and engagement, but was unable to assess the level of use or uptake of the experience cards that were created based on the consultation.<sup>23</sup> Going forward, the government could aim to ensure meaningful application of such guidelines within the public servant network.

The commitment's experimentation with participation methods also brought about some marginal results in opening government. According to the Chairperson of Hollola's Elderly and Disability Council, the participation camp was successful in encouraging youth and the elderly to participate and provide input at least on a local level,<sup>24</sup> and the camp format was carried forward to the next action plan. Participants commended the camp for bringing together members of formal organizations, such as youth and elderly councils, and non-member citizens, as well as the opportunity to have direct dialogue with public servants. The organizers' estimation was that the day was successful in exemplifying some ideas for new participation methods.<sup>25</sup>

As the only commitment in the action plan that was not primarily concerned with improving internal government processes, the fourth commitment has overall made minor progress toward creating equal opportunities for vulnerable groups by testing out methods, documenting best practices and developing official strategies and legislation for engagement. These methods may positively affect civic participation in the future, though their current impact on opening government is difficult to measure.

### **Carried Forward?**

The third action plan carries forward this commitment by aiming to strengthen government support of civic participation and engagement, especially for vulnerable groups. The support for different methods of participation, such as digital services and workshops, has been added as part of the action plan, though it lacks specificity in terms of clear milestones. In addition, three pilots were recycled from the second action plan to the third: the participation camp for youth and the elderly, the Open Government action plan for the municipality of Oulu and developing digital services for the elderly (led by Valli ry).<sup>26</sup>

The IRM researcher recommends that the government continues informing policy through consultation and engagement of citizens, especially vulnerable groups, and introduces a system of implementation of best consultation practices.

<sup>1</sup> Open government information cards, <http://vm.fi/hallinnon-avoisuus/avoim-hallinto/avoimen-hallinnon-tietokortit>

<sup>2</sup> "Uusi nuorisolaki voimaan: tervetuloa valtion nuorisoneuvosto." State Youth Council, 3 January 2017,

<https://tietoanuorista.fi/uusi-nuorisolaki-voimaan-tervetuloa-valtion-nuorisoneuvosto/>

<sup>3</sup> Valtakunnallinen nuorisotyön ja -politiikan ohjelma 2017–2019,

<http://minedu.fi/documents/1410845/4274093/VANUPO+FI+2017+final.pdf/92502e8e-0cd0-40f0-b097-5ef39e1d529f>

<sup>4</sup> Interview with Georg Henrik Wrede, Ministry of Education and Culture, 28 August 2017.

<sup>5</sup> Ibid.

<sup>6</sup> Reform of regional government, <http://alueuudistus.fi/en/reform-of-regional-administration>

<sup>7</sup> "Viisi maakuntaa pilotoi nuorten äänen vahvistamista." Nuorten Keski-Suomi, 29 June 2017,

<http://www.nuortenkeski-suomi.fi/nuorten-aani-maakunnissa/viisi-maakuntaa-pilotoi-nuorten-aanen-vahvistamista-uudessa-maakuntahallinnossa/>

<sup>8</sup> Avoimen hallinnon II. toimenpideohjelman tilannekatsaus 22.3.2017,

<http://vm.fi/documents/10623/1193298/Avoimen-hallinnon+2.+toimintaohjelman+tilannekatsaus+22.3.2017.pdf/fb3f63d5-5abc-459a-8c19-5054cd9090bd>

<sup>9</sup> Avoimen hallinnon tieto- ja kokemuskortit, <http://vm.fi/hallinnon-avoisuus/avoim-hallinto/avoimen-hallinnon-tietokortit>

<sup>10</sup> Information about the "Afternoon of Children's Rights" in 2016 and 2015,

<http://vm.fi/hallinnon-avoisuus/avoim-hallinto/materiaaleja-ja-taustaa>

<sup>11</sup> Webcast of the "Afternoon of Children's Rights" on 14 November 2017,

<http://videonet.fi/web/vm/20171114/>

<sup>12</sup> Elderly Council Day, 5 April 2017,

[http://www.ymparisto.fi/fi-FI/Asuminen/lkaantyneiden\\_asuminen/Vanhusneuvostopaiva\\_542017\(42339\)](http://www.ymparisto.fi/fi-FI/Asuminen/lkaantyneiden_asuminen/Vanhusneuvostopaiva_542017(42339))

<sup>13</sup> Nuorten ja ikäihmisten vaikuttamispäivä Hollola, 27.4.2017: Yhteenveto prosessista ja päivän tuloksista,

<http://avoimhallinto.fi/assets/files/2017/07/Nuorten-ja-ika%CC%88ihmisten-vaikuttamispa%CC%88iva%CC%88-Yhteenveto-prosessista-ja-pa%CC%88iva%CC%88n-tuloksista-15.6.2017-2.pdf>

<sup>14</sup> VANUPO draft, 29 May 2017, [https://api.hankeikkuna.fi/asiakirjat/d98fdfdb-42e6-4e91-bc55-d92680d8bfdd/8a826ebc-cbdb-48b4-a38c-e13699165dcc/KIRJE\\_20170601121833.pdf](https://api.hankeikkuna.fi/asiakirjat/d98fdfdb-42e6-4e91-bc55-d92680d8bfdd/8a826ebc-cbdb-48b4-a38c-e13699165dcc/KIRJE_20170601121833.pdf)

<sup>15</sup> "Lasten ja nuorten osallistumisen ja vaikuttamisen mahdollisuudet." The National Institute of Health and Welfare, 21

December 2017, [https://www.thl.fi/fi/web/lapset-nuoret-ja-perheet/johtamisen\\_tueksi/lasten\\_ja\\_nuorten\\_vaikuttamismahdollisuudet](https://www.thl.fi/fi/web/lapset-nuoret-ja-perheet/johtamisen_tueksi/lasten_ja_nuorten_vaikuttamismahdollisuudet)

<sup>16</sup> Finland's II. Open Government Action Plan (in Finnish), p. 14,

<http://avoimhallinto.fi/assets/files/2017/07/Avoimen-hallinnon-toinen-toimintasuunnitelma.pdf>

<sup>17</sup> Interview with Eero Rämö, Allianssi, 4 September 2017.

<sup>18</sup> Article 8 of the Youth Act (1285/2016),

<http://www.finlex.fi/fi/laki/alkup/2016/20161285#Pidp450366240>

<sup>19</sup> Interview with Georg Henrik Wrede, Ministry of Education and Culture, 28 August 2017.

<sup>20</sup> Interview with Johanna Nurmi, Ministry of Finance, 16 August 2017.

<sup>21</sup> "VANUPO tuli – oletko valmis?" State Youth Council, 16 October 2017,

<https://tietoanuorista.fi/vanupo-tuli-oletko-valmis/>

<sup>22</sup> Official statement by the Central Union for Child Welfare, the Mannerheim League for Child Welfare, Save the Children, and the Family Federation of Finland, <https://www.lskl.fi/kannanotot-ja-lausunnot/5119/>

<sup>23</sup> Interview with Georg Henrik Wrede, Ministry of Education and Culture, 28 August 2017.

<sup>24</sup> Interview with Katriina Haapakangas, Chairperson of Hollola's Elderly and Disability Council, 24 August 2017.

<sup>25</sup> Nuorten ja ikäihmisten vaikuttamispäivä Hollola, 27.4.2017: Yhteenveto prosessista ja päivän tuloksista,

<http://avoimhallinto.fi/assets/files/2017/07/Nuorten-ja-ika%CC%88ihmisten-vaikuttamispa%CC%88iva%CC%88-Yhteenveto-prosessista-ja-pa%CC%88iva%CC%88n-tuloksista-15.6.2017-2.pdf>

<sup>26</sup> Launch event for Finland's III. action plan, 24 August 2017,

<http://avoimhallinto.fi/avoimen-hallinnon-iii-toimintaohjelman-kaynnistystilaisuuden-24-8-2017-esitykset/>

## Methodological Note

The end-of-term report is based on desk research and interviews with governmental and nongovernmental stakeholders. The IRM report builds on the findings of the government's self-assessment report; other assessments of progress put out by civil society, the private sector, or international organizations; and the previous IRM progress report.

The IRM researcher collected data and analysis focused on the IRM progress report, the government's end-of-term self-assessment report, as well as online sources and transcripts of interviews conducted by the previous IRM researcher in August 2017. Additional interviews were conducted via phone and email in December 2017 and January 2018. The interviewees are listed below.

- Virpi Einola-Pekkinen, Ministry of Finance;
- Katriina Haapakangas, Chairperson of the Elderly and Disability Council;
- Katju Holkeri, Ministry of Finance;
- Marko Latvanen, Population Register Center;
- Johanna Nurmi, Ministry of Finance;
- Päivi Nurminen, the Prime Minister's Office;
- Merja-Maaria Oinas, Koordinaatti – Youth Information and Counseling;
- Teemu Ropponen, Open Knowledge Finland;
- Eero Rämö, Allianssi ry;
- Georg Henrik Wrede, Ministry of Education and Culture;
- Niklas Wilhelmsson, Ministry of Justice.

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

