

Independent Reporting Mechanism (IRM): Finland Design Report 2017–2019

Daria Pritup, Independent Researcher
Teemu Laulainen, Independent Researcher

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Executive Summary: Finland

Finland's third action plan focused on improved access to information and participation of vulnerable groups. Although the co-creation process involved significant levels of civil society consultation, commitments did not end up being specific and measurable. Moving forward, the next action plan would benefit from the inclusion of results-oriented commitments, with identification of responsible institutions and implementation timetables.

The Open Government Partnership (OGP) is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. The Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Finland joined OGP in 2012. Since then, Finland has implemented two action plans. This report evaluates the design of Finland's third action plan.

General overview of action plan

Finland continues to perform highly in areas of transparency, participatory budgeting, and anti-corruption. The third action plan builds on themes included in the previous two plans, emphasising easier access to government information and participation across diverse groups of society. The action plan contains several commitments linked to the provision of information on historical administrative reorganisation, tied to the planned landmark reform encompassing social and health services and regional governance. However, the commitments in the third action plan are vague and lack specific indicators to measure implementation and results.

Compared with the previous action plan, the co-creation process of the current plan involved a higher degree of civil society participation. The government held an open call for proposals, followed by a workshop to vote on themes and an online consultation about commitment areas. Finland maintained a robust multi-stakeholder forum consisting of several groups, each with different roles in the co-creation process.

Major stakeholder priorities for Finland's third action plan included accessibility of services and participation opportunities for various groups, such as minorities and different age groups. Although civil society was highly involved in the co-creation process and the action plan generally reflected these priorities, the final commitments lacked concrete milestones and responsible institutions to monitor implementation.

Table 1. At a glance

Participating since: 2012
Action plan under review: 3
Report type: Design
Number of commitments: 7

Action plan development

Is there a Multistakeholder forum: Yes
Level of public influence: Involve
Acted contrary to OGP process: No

Action plan design

Commitments relevant to OGP values: 6 (86%)
Transformative commitments: 0

Action plan implementation

Starred commitments: N/A
Completed commitments: N/A
Commitments with Major DIOG*: N/A
Commitments with Outstanding DIOG*: N/A

*DIOG: Did it Open Government?



One notable commitment (3) involves widening Finland’s access to the information principle (which obliges government agencies to make documents relating to decision-making publicly available) to also apply to public services that are incorporated, in other words, produced by corporate entities.

Table 2. Noteworthy commitments

Commitment description	Moving forward	Status at the end of implementation cycle.
<p>3. Widen access to information principle</p> <p>Extend the access to information principle to cover public services that are produced in a company format.</p>	<p>If carried forward, the government could clarify whether outsourced public services produced by privately owned businesses will also be covered by the access to information principle. The IRM researcher also recommends that the Ministry of Justice complete its review of whether or not expanding the access to information principle to incorporated services requires a change in existing law.</p>	<p><i>Note: this will be assessed at the end of action plan cycle.</i></p>

Recommendations

The IRM recommendations aim to inform the development of the next action plan and to guide implementation of the current action plan.

Table 3. Five KEY IRM Recommendations

1. Improve commitment quality through better problem-solution framing, clarifying relevance to OGP values, and identifying verifiable milestones.
2. Increase high-level government representation in a multi-stakeholder forum for a more ambitious action plan.
3. Allow for greater civil society participation in shaping the final scale and scope of commitments
4. Extend commitments related to the Regional Government, Health and Social Services Reform to cover several action plans.
5. Assess the feasibility and legal status of proposed commitments during the action plan development process.

ABOUT THE AUTHORS

Teemu Laulainen is a PhD researcher at King's College London. His ESCR-funded research project focuses on the history of international law. He holds an Honours Degree in Politics from the University of Glasgow, summa cum laude from Sciences Po Paris, and an MA in War Studies from King's College London.

Daria Pritup (MA, University of Helsinki) has a background in Area and Cultural Studies and Sociolinguistics. She has coordinated the Network of Academic Institutions in Romani Studies (NAIRS) and is currently a project manager at leadership consulting agency Milton Sparks.

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



I. Introduction

The Open Government Partnership is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. Action plan commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate action in an entirely new area. OGP's Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Civil society and government leaders use the evaluations to reflect on their own progress and determine whether actions have had an impact on people's lives.

Finland joined OGP in 2012. This report covers the development and design of Finland's third action plan for 2017 to 2019.

The Independent Reporting Mechanism of OGP has partnered with Daria Pritup and Teemu Laulainen, who carried out this evaluation. The IRM aims to inform ongoing dialogue around development and implementation of future commitments. For a full description of the IRM's methodology, please visit <https://www.opengovpartnership.org/about/independent-reporting-mechanism>.

II. Open Government Context in Finland

Finland is a robust parliamentary democracy ranking high in indices measuring political stability, access to information, press freedom, and control of corruption. Finland's third national action plan builds upon themes introduced in the first two action plans, but its commitments are not ambitious and lack specific indicators to measure results. The action plan also seeks to address a historical administrative reorganisation, necessitated by a planned landmark reform encompassing social and health services and regional governance.

Finland is a unitary parliamentary republic with 5.5 million inhabitants and \$45.7 thousand GDP per capita (2017).¹ The Finnish administrative structure is composed of the highest bodies of the state, 12 ministries, six Regional State Administrative Agencies and local self-governing municipalities.² The country has a multiparty political system with fixed four-year parliamentary terms, it holds free and fair elections, and it has been a member of the European Union since January 1995. Finland has an independent judiciary and a long-standing historical commitment to the rule of law. The country has low levels of corruption, and freedoms of speech, religion, and association are protected by the law and respected in practice.³ Women and ethnic minorities enjoy similar legal protection.⁴⁵ Finland boasts the world's first Freedom of Information Act, developed by a Finnish enlightenment thinker and politician Anders Chydenius and adopted in Sweden in 1766.⁶

Previous OGP action plans

Finland's third national action plan builds upon themes introduced in the previous action plans, including the use of clear language in government administration, citizen participation, and access to information. A new major area in the third action plan relates to a planned wholesale reform of social and health services and regional governance (Commitments 6 and 7). Although these commitments are well timed, this reform is currently surrounded by a high degree of political uncertainty, and it did not gain parliamentary approval during the design or implementation period of this action plan. Compared with the previous action plans, the commitments in Finland's third action plan are vaguely formulated and lack measurable milestones.

Civic participation and civic space

There are currently more than 106,000 registered associations in Finland,⁷ a large number given the country's population. The ideal of civic participation is grounded in the Constitution, which provides "the right of the individual to participate in and influence the development of society and his or her living conditions".⁸ An example of innovative participation opportunities is provided by the practice of *participatory budgeting* (*Osallistuva budjetointi*) by the Helsinki City Council,⁹ which empowers citizens in the decision on how a sum of 4.4 million euros (2018) should be spent over the fiscal year.¹⁰ The participatory budgeting is aimed at tackling, *inter alia*, marginalisation and exclusion. However, local democracy researchers from the University of Helsinki believe that participatory budgeting is also problematic. The true beneficiaries of such models may not be those who need them most, and not all projects are fit to be co-created with the public.¹¹

In Finland, freedom of expression, association, and assembly are protected by law and respected. The Finnish media are independent and generally do not submit to political pressure or censorship, yet between 2016 and 2018, Finland's World Press Freedom Index rank fell from first to fourth place.¹² The reasons for this decrease include several media scandals. Significantly, in 2016, the Finnish National Broadcasting Company (YLE) reported on the Finnish prime minister's possible conflict of interest regarding a mining company, Terrafame, which received significant financial aid from the Finnish government and subsequently awarded a contract worth 0.5 million euros to a company the prime minister's relatives owned. As the media discussion became heated, YLE's management decided to curb the reporting.¹³ Following this, an email correspondence between the prime minister, a reporter and YLE's editor-in-chief was made public, fostering the perception that the national broadcasting company had succumbed to political pressure.

Accountability and Transparency

Finland has low levels of corruption and organised crime and a robust legal framework governing official misconduct, and the country tends to perform consistently well on comparative political indices measuring good governance.¹⁴ Finland ranks third on Transparency International's Corruption Perceptions Index of 2018, showing low perceptions of corruption in the public sector.¹⁵ Since 2016, a prominent electricity transmission company named Caruna has been under public scrutiny for its use of tax shelters.¹⁶ In November 2018, the NGO Finnwatch collected 11,300 signatures calling for a change in legislation that allowed Caruna to use tax shelters and delivered this petition to the Parliamentary Finance Committee. However, there was no initiative on the part of the government to change the legislation.¹⁷ Since 2013, a number of top-level police officers have faced prosecution for official misconduct, relating to informant register mismanagement and serious corruption within the drug enforcement unit of the Helsinki Police.¹⁸

Despite these scandals, trust in public institutions remains relatively high among the Finnish population.¹⁹ The country has a high level of income and tax transparency, as details on individual income and tax contributions are made public yearly.²⁰ The Ministry of Finance provides detailed budget information online with accessible visualisations.²¹ In 2018, the Finnish Parliament implemented the EU's Fifth Anti-Money Laundering Directive (the "Fifth AML Directive"), and the new regulations governing beneficial ownership came into force on 1 January 2019.²² However, in May 2017, the Finnish parliament passed a controversial law that ended a requirement for direct holding of investments (Hallintarekisterilaki, HE 26/2016). According to critics, the new law degrades the transparency of beneficial ownership.²³ The law was passed with amendments requiring the Finnish tax authorities to continue to receive information on beneficial owners whose securities are held in foreign depositories.²⁴ During the period of this action plan, Finland improved the protection of whistleblowers (Government Proposal 49/2018) following an EU directive [(EU)2016/943].²⁵ The new law protects whistleblowers from prosecution for misappropriation of trade secrets in cases in which the disclosed information reveals misconduct, wrongdoing, or illegal activity, and the disclosure protects the general public interest.²⁶

Areas of governance concern and changes in power during the period of the action plan

Continuing the work of previous governments, Juha Sipilä's government (2015–2019) tried to pass a major Regional Government, Health and Social Services Reform (Sote- ja maakuntauudistus) but failed to do so, leading to the government's collapse on 8 March 2019.²⁷ This wholesale reform aimed to address demographic pressures on Finland's universal healthcare system and social services. Although the need for the reform garners cross-party support, its substance and mechanics are subject to continuing political debate. The Finnish social and health services are currently organised by nearly 300 municipalities.²⁸ If the reform is reintroduced by the next government and passed by the parliament, it [the reform] is likely to make these services more centralised, through a transfer of responsibilities from municipalities to larger regional actors. Based on pilot schemes, this reform is also likely to increase the role of private companies as the producers of public services, which poses acute challenges to transparency and accountability in the use of public funds.²⁹ Commitments number 6 and 7 in Finland's third action plan directly relate to the regional government aspect of this reform (maakuntahallinto). Finland will hold the next parliamentary election on 14 April 2019. The next government is likely to continue the drafting and implementation of the Regional Government, Health and Social Services Reform, and its ultimate form depends on the new government's political make-up.

¹ The World Bank, GDP per capita 2017, <https://data.worldbank.org/indicator/NY.GDP.PCAP.CD>.

² Ministry of Finance, <https://vm.fi/en/administrative-structures>

³ "Freedom in the World 2018: Finland," Freedom House, <https://freedomhouse.org/report/freedom-world/2018/finland>

⁴ Ibid.

⁵ The country has not ratified the ILO-convention 169 (Indigenous and Tribal Peoples Convention, 1989) despite of being home to approximately 10.000 indigenous Sámi people.

⁶ "The World's First Freedom of Information Act: Anders Chydenius' Legacy Today" https://www.chydenius.net/tiedostot/worlds_first_foia.pdf

⁷ Finnish Patent and Registration Office: number of associations and religious communities at the Register of Associations and the Register of Religious Communities, 30.11.2018, <https://www.prh.fi/en/yhdistysrekisteri/statistics/numberofassociationsandreligiouscommunities.html>.

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- ⁸ "Constitution of Finland," Ministry of Justice, 2012. <https://oikeusministerio.fi/en/constitution-of-finland>
- ⁹ "OmaStadi," City of Helsinki, 2018. <https://omastadi.hel.fi/?locale=en>
- ¹⁰ <https://www.hel.fi/uutiset/en/kaupunginkanslia/participatory-budgeting-launched-with-workshops>
- ¹¹ "Helsinki antaa kaupunkilaisille jaettavaksi neljä miljoonaa euroa – Kenelle "demokratia-hankkeen" hyödyt valuvat?," Helsingin Sanomat, 13.3.2018, <https://www.hs.fi/kaupunki/art-2000005601480.html>.
- ¹² 2018 Press Freedom Index <https://rsf.org/en/ranking>
- ¹³ "Mistä pääministerin ja Ylen välisessä jupakassa on kyse? Yhteenveto kohun keskeisistä vaiheista," Helsingin Sanomat, 1.12.2016, <https://www.hs.fi/kotimaa/art-2000004890340.html>
- ¹⁴ "Finland among the best in the world," Statistics Finland, 5.12.2018 http://www.stat.fi/tup/satavuotias-suomi/suomi-maailman-karjessa_en.html
- ¹⁵ 2018 Corruption Perceptions Index. Transparency International <https://www.transparency.org/cpi2018#results>
- ¹⁶ "Analyysi: Hinnankorotuksilla asiakkaat suuttanut Caruna jatkaa verosuunnittelua – veroprosentti 0,28," YLE News, 9.7.2017, <https://yle.fi/uutiset/3-9707226>.
- ¹⁷ "Carunan verovälttelyyn ei puututa," Finnwatch, 16.11.2018, <https://finnwatch.org/fi/blogi/586-carunan-verovaelttelyyn-ei-puututa>.
- ¹⁸ "Police top brass on trial over informant register mismanagement," YLE News, 14.8.2018. https://yle.fi/uutiset/osasto/news/police_top_brass_on_trial_over_informant_register_mismanagement/10351868
- ¹⁹ Salminen, A. and Viinämäki, O.P., Piilokorruptio Suomessa: Mitä kansalaiset kertovat?, Vaasan yliopisto, 2017, https://www.univaasa.fi/materiaali/pdf/isbn_978-952-476-740-8.pdf.
- ²⁰ "In Finland, all it takes is a phone call to find out how much your neighbour earned last year," YLE News, 31.10.2017, https://yle.fi/uutiset/osasto/news/in_finland_all_it_takes_is_a_phone_call_to_find_out_how_much_your_neighbour_earned_last_year/9909781
- ²¹ "Tutki budjettia," Ministry of Finance, 2019. <https://tutkibudjettia.fi/etusivu>
- ²² "Government Proposal to implement EU's Fifth Anti-Money Laundering Directive in Finland," Dittmar & Indrenius, 4.10.2018, <https://www.dittmar.fi/insight/government-proposal-to-implement-eu-fifth-anti-money-laundering-directive-in-finland/>. "Implementation of the fifth AML directive – New obligations, virtual currencies and monitoring of bank and payment accounts" Dittmar & Indrenius, 19.12.2018, <https://www.dittmar.fi/insight/implementation-of-the-fifth-aml-directive-new-obligations-virtual-currencies-and-monitoring-of-bank-and-payment-accounts/>
- ²³ "Veroasiantuntija varoittaa: hallintarekisterilaki mahdollistaa kytkösten peittelyn esimerkiksi sotepuolella", YLE News, 40.4.2017. <https://yle.fi/uutiset/3-9589436>
- ²⁴ "Lainmuutokset turvaavat verottajan tiedonsaantia hallintarekisteröidyistä osakkeista," Finnish Government, 05.12.2018. https://valtioneuvosto.fi/artikkeli/-/asset_publisher/10623/lainmuutokset-turvaavat-verottajan-tiedonsaantia-hallintarekisteröidyista-osakkeista ; "Kiistelty hallintarekisterilaki sai viimein pontensa – Lopputuloksena verotus voi kiristyä ja sijoitukset Suomeen vähentyä," Suomen Kuvalehti, 7.12.2018. <https://suomenkuvalehti.fi/jutut/kotimaa/kiistelty-hallintarekisterilaki-sai-viimein-pontensa-lopputuloksena-verotus-voi-kiristya-ja-sijoitukset-suomeen-vahentya/>
- ²⁵ "Ilmiantajan suoja parani – "korvaamattoman arvokkaita", " Talouselämä, 13.9.2018. <https://www.talouselama.fi/uutiset/ilmiantajan-suoja-parani-korvaamattoman-arvokkaita/5c16aa3e-1a9c-3a87-905f-38fb0a2ab371>
- ²⁶ "Uusi liikesalaisuuslaki suojaaa väärinkäytösten ilmiantajaa," Tuuli Toivanen, 10.9.2018. <https://ajankohtaistakilpailusta.fi/2018/09/10/uusi-liikesalaisuuslaki-suojaavaarinkaytosten-ilmiantajaa/>
- ²⁷ "Government collapses over failed social, health care reform," YLE News, 8.3.2019. https://yle.fi/uutiset/osasto/news/government_collapses_over_failed_social_health_care_reform/10679258
- ²⁸ "Yle News Explains: What is Sote?" YLE News, 20.3.2017. https://yle.fi/uutiset/osasto/news/yle_news_explains_what_is_sote/9516700
- ²⁹ Kirsi Väättäminen, Lawyer, SOSTE Finnish Federation for Social Affairs and Health. Email interview 19.02.2019; "Sote-laboratoriossa" uusia tuloksia: vanhuksat joutuneet taistelemaan kotikunnasta muuttoon vastaan, kunnanjohtajasta kokonaisuus toimii," YLE News, 27.9.2017. <https://yle.fi/uutiset/3-9849344> ; Siun sote, <http://www.siunsote.fi/>.

III. Leadership and Multi-stakeholder Process

The design and co-creation process of Finland's third action plan allowed a high level of public influence, especially during the early stages of the process. The Finnish multi-stakeholder forum consists of multiple groups with significant civil society representation. The OGP process could benefit from awareness-raising activities in the lead up to the co-creation of the next action plan.

3.1 Leadership

This subsection describes the OGP leadership and institutional context for OGP in Finland.

The Ministry of Finance coordinates the OGP process in Finland with a core team of two senior civil servants and one assistant. The head of government has not been involved in the OGP process, and high-level governmental representation in OGP events has been scarce.¹ As the OGP process is not mandated through a legally binding document and the Ministry of Finance has limited power over other cooperation partners in OGP (such as ministries, agencies and municipalities), the implementation of commitments depends on the activity of each agency. However, action plans are approved by the Minister of Local Government and Public Reforms.

The Ministry of Finance nominates an Open Government Support Group (Avoimen hallinnon toimeenpanon tukiryhmä) to support the implementation of each action plan.² The Support Group is composed of civil servants and CSO representatives (see Section 3.2 on the multi-stakeholder forum). The non-governmental members of the Support Group are chosen based on their expertise in different commitment areas.³

Compared with the previous action plan cycle (2015–2017), the core team leading the OGP process from the Ministry of Finance has been reduced by one senior civil servant. The budget allocated to OGP activities is 40,000 euros per year.⁴ In the self-assessment report, the government stated that the OGP program lacks resources, which hinders, for example, comprehensive marketing and communication of OGP projects and events.⁵

During the action plan period, the government has been occupied with the Health, Social Services and Regional Government Reform. New regional elections were supposed to take place in May 2019 but were postponed indefinitely as of February 2019.⁶ Additionally, Finland will take over the presidency of the Council of the European Union from 1 July 2019.⁷ The preparation involved in these large-scale reforms and events may have affected OGP activity.

3.2 Multi-stakeholder process throughout action plan development

In 2017, OGP adopted the OGP Participation and Co-Creation Standards intended to support participation and co-creation by civil society at all stages of the OGP cycle. All OGP-participating countries are expected to meet these standards. The standards aim to raise ambition and quality of participation during development, implementation, and review of OGP action plans.

OGP's Articles of Governance also establish participation and co-creation requirements that a country or entity must meet in its action plan development and implementation to act according to OGP process. Finland **did not act** contrary to OGP process.⁸

Please see Annex I for an overview of Finland's performance implementing the Co-Creation and Participation Standards throughout the action plan development.

Table 3.1: Level of Public Influence

The IRM has adapted the International Association for Public Participation (IAP2) "Spectrum of Participation" to apply to OGP.⁹ 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 "collaborate".

Level of public influence		During development of action plan
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	

Multi-stakeholder forum

In Finland, the multi-stakeholder forum (MSF) consists of several groups: the Open Government Team and Support Group, the Advisory Board for the Civil Society Policy, the Civil Servants Network and Executive Committee, and the Local Democracy Network of Municipalities. The groups have varying advisory, decision-making, and oversight roles over different parts of the OGP process.

The Open Government Support Group consists of roughly 16 members (the additional appointment of members is allowed throughout the implementation period) including civil servants, civil society representatives, municipality representatives, journalists, and research fellows. The Ministry of Finance appoints the group, which meets several times per year to discuss the action plan implementation process. Public records of the meetings have been available online since March 2016.¹⁰ The group is also responsible for producing the government's OGP self-assessment report.

The Advisory Board for the Civil Society Policy (KANE) is a four-year-period steering board the Ministry of Justice coordinates. The Executive Committee is composed of selected members of the Civil Servants Network, which in turn is composed of representatives of different agencies – each of them responsible for open government issues in its own agency. Finally, the Democracy Network of Municipalities (coordinated by the Association of Local and Regional authorities) is an open network concerned with democracy on a municipal level.

Participation and engagement throughout action plan development

The government began the co-creation process for the third action plan by collecting ideas on possible themes. The call for proposals was open to anyone who wished to give input, and opportunities to submit proposals were also arranged outside the capital, in the cities of Tampere, Seinäjoki, and Rovaniemi.¹¹ The task did not include background material on the OGP process. Responses were collected and discussed at an open workshop on 6 September 2016 with 60 attendees. The attendees voted for the three most important themes for inclusion in the third action plan, which were 1) open knowledge and decision-making, 2) accessibility of services, and 3) participation for all.

The workshop was followed by an online consultation period (6 September–30 September 2016) on the most important themes of the action plan, and the results of the consultation were made available online.¹² The action plan development was then presented to Minister Anu Vehviläinen (Ministry of Finance), who is in charge of the OGP process.¹³ Another consultation was conducted via Facebook, but it produced few comments.¹⁴

A second open workshop was organised on 23 November 2016 with 40 attendees, where specific commitments were developed based on the three main themes.¹⁵ The government then assessed the resulting draft commitments for importance and feasibility, using an online tool (ZEF Survey). Ten of these commitments were then published on a consultation portal for further public comments.¹⁶ The online survey produced 46 statements, which were compiled and published online with comments from the Open Government Support Group.¹⁷ This was followed by a wide consultation round with different government agencies and civil society organisations, which had a chance to comment on individual commitments.¹⁸ This final consultation round with stakeholders and civil servants resulted in minor changes in the commitments. The main critiques raised during this consultation round were that the action plan lacked concrete milestones and responsible institutions to monitor implementation. The response from the Ministry of Finance was that this lack of specificity would be addressed during the implementation period.

The action plan was presented once again to Minister Vehviläinen for approval and sent to OGP on 17 March 2017. The action plan development process thus lasted more than five months in total.¹⁹ In terms of gender equality, the Ministry of Finance does not explicitly track the gender balance in participation and engagement but assesses that there was significant representation of women.²⁰ This self-assessment by the Ministry of Finance is supported by a general overview of the public documentation of the co-creation process.

Co-creation and participation recommendations throughout development

Finland showed evidence of strong performance in areas of multi-stakeholder forum mandate, composition, and conduct. The initial consultation period with the open call to submit ideas, followed by an open workshop and a public online consultation, shows a high degree of openness in the action plan development process. The MSF has a strong CSO representation, and the work of the MSF overall is clearly documented and publicly available.

Some areas in which Finland can improve include the following:

- MSF communication and outreach, especially during the early stages of the action plan development process, and
- The incorporation of concrete milestones and identification of responsible institutions in the action plan to demonstrate civil society impact.

To improve performance in these areas, the IRM researcher suggests that, moving forward, the following actions be taken:

- Increase awareness-raising activities in the lead-up to the development of the fourth action plan, and
- Address the issue of vagueness in the commitments during the co-creation process to demonstrate concrete stakeholder impact and to achieve a coding of “Collaborate”.

¹ According to Johanna Nurmi (Ministerial Adviser, Ministry of Finance) the Minister in charge of the OGP process has participated in the co-creation process by commenting the Action Plan and one addition was made based on their comments. Email interview 26.02.2019.

² Avoimen hallinnon toimeenpanon tukiryhmä, Ministry of Finance, <https://vm.fi/hallinnon-avoimuus/avoim-hallinto/tukiryhman-toiminta>

³ Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland). Email interview 26.02.2019.

⁴ Finland Mid-term Progress Report 2017-2019, p. 9, <https://www.opengovpartnership.org/documents/finland-mid-term-progress-report-2015-2017>.

⁵ Finland Mid-term Self-assessment 2017-2019, p.2, https://www.opengovpartnership.org/sites/default/files/Finland_Mid-Term_Self-Assessment_2017-2019_EN.pdf.

⁶ “Finland to postpone first county elections until next autumn, says Vehviläinen,” Helsinki Times, 08.11.2018, <http://www.helsinkitimes.fi/finland/finland-news/politics/15939-finland-to-postpone-first-county-elections-until-next-autumn-says-vehvilainen.html>.

⁷ “Finland preparing for Presidency of the Council of the European Union,” Prime Minister’s Office Finland, <https://vnk.fi/eu/finlands-eu-presidency>.

⁸ Acting Contrary to Process - Country did not meet (1) “involve” during the development or “inform” during implementation of the NAP (2) government fails to collect, publish and document a repository on the national OGP website/webpage in line with IRM guidance.

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- ⁹ “IAP2’s Public Participation Spectrum,” IAP2, 2014.
http://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/foundations_course/IAP2_P2_Spectrum_FINAL.pdf
- ¹⁰ The OGP support group meeting records,
<http://vm.fi/hallinnon-avoimuus/avoin-hallinto/tukiryhman-toiminta>.
- ¹¹ Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland). Email interview 26.02.2019.
- ¹² Online consultation portal, Otakantaa.fi, <https://www.otakantaa.fi/fi/hankkeet/100/osallistuminen/200/kysely/>.
- ¹³ Finland Mid-term Self-assessment 2017-2019, p.5, https://www.opengovpartnership.org/sites/default/files/Finland_Mid-Term_Self-Assessment_2017-2019_EN.pdf.
- ¹⁴ Ibid.
- ¹⁵ Ibid.
- ¹⁶ Ibid.
- ¹⁷ Summary of comments on Finland’s third national action plan submitted during the consultation period 2 February – 3 March 2017, <https://avoinhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.
- ¹⁸ “Avoimen hallinnon III toimintasuunnitelman lausuntopyynnön lausuntoyhteenveto,” Ministry of Finance, 02.02.2017.
<https://avoinhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>
- ¹⁹ Finland Mid-term Self-assessment 2017-2019, p.5, https://www.opengovpartnership.org/sites/default/files/Finland_Mid-Term_Self-Assessment_2017-2019_EN.pdf.
- ²⁰ Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland). Email interview 26.02.2019.

IV. Commitments

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

Commitments should be appropriate to each country's/entity's unique circumstances and challenges. OGP commitments should also be relevant to OGP values laid out in the OGP Articles of Governance and Open Government Declaration that all OGP-participating countries have signed.¹ The indicators and method used in the IRM research can be found in the IRM Procedures Manual.² A summary of key indicators the IRM assesses is found below:

- **Verifiability:**
 - Not specific enough to verify: As written in the commitment, do the objectives stated and actions proposed lack sufficient clarity and specificity for their completion to be objectively verified through a subsequent assessment process?
 - Specific enough to verify: As written in the commitment, are the objectives stated and actions proposed sufficiently clear and specific to allow for their completion to be objectively verified through a subsequent assessment process?
- **Relevance:** This variable evaluates the commitment's relevance to OGP values. Based on a close reading of the commitment text as stated in the action plan, the guiding questions to determine the relevance are the following:
 - **Access to Information:** Will the government disclose more information or improve the quality of the information disclosed to the public?
 - **Civic Participation:** Will the government create or improve opportunities or capabilities for the public to inform or influence decisions or policies?
 - **Public Accountability:** Will the government create or improve public-facing opportunities to hold officials answerable for their actions?
 - **Technology & Innovation for Transparency and Accountability:** Will technological innovation be used in conjunction with one of the other three OGP values to advance either transparency or accountability?
- **Potential impact:** This variable assesses the *potential impact* of the commitment, if completed as written. The IRM researcher uses the text from the action plan to:
 - Identify the social, economic, political, or environmental problem;
 - Establish the status quo at the outset of the action plan; and
 - Assess the degree to which the commitment, if implemented, would affect performance and tackle the problem.
- **Completion:** This variable assesses the commitment's implementation and progress. This variable is assessed at the end of the action plan cycle, in the *IRM Implementation Report*.
- **Did It Open Government?:** This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice, in areas relevant to OGP values, has changed as a result of the commitment's implementation. This variable is assessed at the end of the action plan cycle, in the *IRM Implementation Report*.

What makes a potentially starred commitment?

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/entities. Starred commitments are considered exemplary OGP commitments. To receive a star, a commitment must meet several criteria:

- Potential star: The commitment's design should be **verifiable**, **relevant** to OGP values, and have **transformative** potential impact.
- To achieve starred status, the government must make significant progress on these commitments during the action plan implementation period, receiving an assessment of **Substantial** or **Complete** implementation.

This variable is assessed at the end of the action plan cycle, in the *Implementation IRM report*.

General Overview of the Commitments

The commitments in Finland's third action plan are mostly vague and unambitious. The government of Finland provided more detailed activities for the commitments during the implementation period, but the IRM assesses action plans *as submitted* to OGP, unless the government formally submits amendments to OGP within one year of the action plan period, which the Finnish government did not do. The commitments call for the use of clear language in government administration, an increase of citizen participation especially for vulnerable groups, and improved access to information.

Most commitments lack specificity and verifiability and would benefit from the inclusion of individual milestones, identification of responsible institutions, implementation timetable, and a clear public-facing element. The lack of concrete and measurable activities was a common criticism in all stakeholder interviews conducted for the purposes of this report. Three out of seven commitments relate either directly or indirectly to the Regional Government, Health and Social Services Reform, making it difficult to assess their potential impact at this stage due to this reform's uncertain political status.

¹ "Open Government Partnership: Articles of Governance," OGP, June 2012 (Updated March 2014 and April 2015), https://www.opengovpartnership.org/sites/default/files/attachments/OGP_Articles-Gov_Apr-21-2015.pdf

² "IRM Procedures Manual," OGP, <https://www.opengovpartnership.org/documents/irm-procedures-manual>

I. Supporting everyone’s possibility to participate.

Language of the commitment as it appears in the action plan:

“Enhancing citizens’ possibilities to participate in the preparatory work of public administration’s decision-making and development projects.

Taking care of the accessibility of engagement and the availability of participation possibilities. The different forms of participation function only if citizens can find them. The engagement possibilities of especially those who are in a vulnerable position, like children and special groups, will be strengthened.

Supporting the use of different forms of participation side by side. Different ways of participation can be for instance digital channels and services, different kinds of events and workshops, experiments and events.

Securing the comprehensive use of the consultation portal (lausuntopalvelu.fi) in the state administration and enhancing its use in the regions and municipalities.”¹

Start Date: Not identified

End Date: Not identified

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
I. Overall	✓			✓				✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment addresses the need for citizens to be more involved in the early stages of public administration planning in Finland by providing citizens with a one-stop-shop consultation portal (lausuntopalvelu.fi) for government consultation in planning and decision-making and by making forms of participation easily discoverable, accessible² and understandable. The commitment calls for special attention to be paid to vulnerable groups, although such groups are not identified in the commitment beyond children and “special groups”.³ According to an estimate by the Finnish Centre for Easy to Read (2014), 8%–12% of Finns, including immigrants studying Finnish language, elderly citizens with memory loss, the disabled, and the socially marginalised, need clear language in order to deal with authorities.⁴ These groups are also disadvantaged in terms of keeping up with technological advancement.⁵ This commitment aims to make use of diverse methods of participation to reach a wider variety of citizens.

The commitment falls short in describing the specific measures or activities the government aims to employ to improve citizen participation. The commitment does not identify the responsible institution, participating institutions, measurable activity, or a clear timeline.⁶ The consultation portal provides access to information on the government’s decision-making processes (already established in the previous action plan)⁷, but the objective of securing the comprehensive use of the

consultation portal, as written, does not include any concrete measures to raise awareness of the portal or encourage and facilitate its use. Thus, although the commitment is relevant to the OGP value of civic participation, the lack of specificity in its wording makes its potential impact difficult to assess beyond “minor”. CSOs involved in the preparation and comment round of the action plan endorsed the general aim of commitment yet criticized its lack of specificity and the lack of responsible institutions for the implementation of planned activities.⁸

Next steps

The government’s aim to support accessibility and variety of participation for all is laudable, yet the lack of specific indicators of completion as written makes it difficult to assess. In order to raise the specificity and potential impact of the commitment, the IRM researcher recommends:

- All participating public administration bodies commit to publication of basic information on all projects on the online register “Valtioneuvoston hankeikkuna”;^{9,10}
- Opening up a consultation period on the online consultation portal Otakantaa.fi during preparatory phases of decision-making and development projects;¹¹
- Identifying concrete methods of increasing collaboration with citizens in public administration preparatory work, such as organising participatory workshops during preparatory phases;
- Identifying criteria for such collaboration methods, which ensures that the needs of vulnerable groups (visually and hearing impaired, speakers of minority languages, the elderly, and others) have been considered.¹²
- Defining implementation measurement criteria for each milestone of the commitment.

For the next action plan, the IRM researcher recommends using the OGP commitment template even though the government has not found the OGP format useful for communicating, monitoring, and implementing commitments.¹³ The government has attempted to keep the commitment text short yet broad in scope while narrowing the scope of activities. However, most of the planned activities remain too broad for specific actions to be identified from them and could be broken down into even smaller milestones. To ensure a high potential impact of the commitments, the activities could be extended to cover several action plans, as suggested by IRM during the evaluation of the previous action plan.¹⁴

¹ Finland National Action Plan 2017-2019 (in English),

https://www.opengovpartnership.org/sites/default/files/Finland_NAP_2017-2019_EN.pdf.

² The implementation of accessibility requirements stipulated under the Accessibility Directive (EU 2016/2102) will begin gradually on 23.9.2019. The directive concerns all state and municipal authorities, independent public bodies, universities, and many others. For more information, please see <https://vm.fi/saavutettavuusdirektiivi>.

³ Special (interest) group is a term used in Finnish public administration and it simply means a group of people with a common denominator or special needs.

⁴ Planner Eliisa Uotila, the Finnish Centre for Easy to Read, consultation on the national action plan 3.3.2017, p. 13, <https://avoinhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.

⁵ Sari Vapaavuori, Head of Development, Valli - The Finnish Union for Senior Services. Email interview 22.02.2019.

⁶ Anitta Raitanen, former Executive Director of Kansalaisareena – Citizen Forum, consultation 24.2.2017, p. 18-19, <https://avoinhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.

⁷ Finland End-of-Term Report 2015-2017, p. 13-17,

https://www.opengovpartnership.org/sites/default/files/Finland_EOT_Report_2015-2017_EN_for-public-comment.pdf.

⁸ Summary of comments on Finland’s third national action plan submitted during the consultation period 2 February – 3 March 2017, <https://avoinhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>. Sari Vapaavuori, Head of Development, Valli - The Finnish Union for Senior Services. Email interview 22.02.2019.

⁹ The open project register is managed by The Ministry of Finance, <https://valtioneuvosto.fi/hankkeet>.

¹⁰ Anitta Raitanen, former Executive Director of Kansalaisareena – Citizen Forum, consultation 24.2.2017, p. 18-19, <https://avoinhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.

¹¹ Ibid.

¹² Ibid.

¹³ Joonas Pekkanen, Founder and Coordinator of Open Ministry, Finland, consultation 16.2.2017, p. 20, <https://avoinhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.

¹⁴ Finland Mid-term Progress Report 2015-2017, p. 47, <https://www.opengovpartnership.org/documents/finland-mid-term-progress-report-2015-2017>.

2. Taking care that there are clear descriptions of the reforms and services being prepared by the government

Language of the commitment as it appears in the action plan:

“Providing clearer and easy to understand information about the on-going preparatory work and the services provided by government. Using information and visualization models that have been proven to be clear and accessible.

Paying attention to multichannel information, clear language and plain language.”¹

Start Date: Not identified

End Date: Not identified

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
2. Overall	✓		✓					✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

Information on government services and projects is often written in administrative jargon and can be difficult for the public to understand. During recent years, the Finnish government has paid special attention to the transfer and publication of information on a national scale. The National Architecture for Digital Services program led by the Ministry of Finance between 2014 and 2017 aimed to improve shared information, openness of public administration, and online services.² The focus of this commitment is to make information on the preparatory work on legislation and governance, along with government-provided services, available on a variety of websites and platforms. This commitment further seeks to make this information available in varying formats to reach all targeted audiences. The commitment also plans to make information available in clear and plain language to be understandable to all, thus making it relevant to the OGP value of access to information.

During the consultation period of the action plan, several CSOs commented on the need for more concrete and measurable activities for this commitment.³ According to a representative of the Arts Promotion Centre Finland, the first step to improving the commitment would be to define what “clarity” means in practice.⁴ Similarly, the expression “paying attention” is vague, non-measurable, and lacks a responsible institution.⁵ Continuing from the recommendations of Finland’s previous action plan’s IRM end-of-term report,⁶ the government’s online register for public projects (Valtioneuvoston hankeikkuna) could be further developed as a platform for publication, starting within the preparatory phase of government projects. In addition to providing an opportunity to follow the decision-making process, the platform could be updated with consultation links and information on participation possibilities.⁷ Without more concrete implementation measurements, it is difficult to code the program’s potential to improve access to information beyond “minor”.

Next steps

Due to major governance reforms, such as the Health, Social Services and Regional Government Reform,⁸ the commitment's aim to clarify and diversify information on government activities and services is timely. However, the commitment as written gives no indication as to how the most crucial information is to be selected, which information and visualisation models would be used and how have they been tested, and whether there would be any concrete outputs in plain and clear language on a variety of channels.

The IRM researcher recommends that the government consults with civil society on priority information to be published in clear and plain language and commits to publishing this information by the end of the action plan period. Additionally, the commitment could aim to improve early-stage civic participation in government decision-making. It could be extended over several action plans, including several milestones:

- The creation of a priority list for the need of clear and plain language information on preparatory work and services, starting with a process description for implementation;⁹
- The selection of a variety of channels together with relevant CSOs, including a deadline for publication of the aforementioned information;
- The development of consultation and collaboration methods for government preparatory work together with relevant CSOs;
- The testing of consultation and collaboration methods and the documentation of best practices in this area.

¹ Finland National Action Plan 2017-2019 (in English),

https://www.opengovpartnership.org/sites/default/files/Finland_NAP_2017-2019_EN.pdf.

² National Architecture for Digital Services,

<https://vm.fi/en/national-architecture-for-digital-services>.

³ Summary of comments on Finland's third national action plan submitted during the consultation period 2 February – 3 March 2017, p. 21-30, <https://avoinkhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>. Sari Vapaavuori, Head of Development, Valli - The Finnish Union for Senior Services. Email interview 22.02.2019.

⁴ Minna Sirnö, Head of Arts Promotion Centre Finland, consultation 3.3.2017, p. 24,

<https://avoinkhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.

⁵ Sari Vapaavuori, Head of Development, Valli - The Finnish Union for Senior Services. Email interview 22.02.2019.

⁶ Finland End-of-Term Report 2015-2017, p. 21,

https://www.opengovpartnership.org/sites/default/files/Finland_EOT_Report_2015-2017_EN_for-public-comment.pdf.

⁷ Joonas Pekkanen, Founder and Coordinator of Open Ministry, Finland, consultation 16.2.2017, p. 20,

<https://avoinkhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.

⁸ For more information on the regional government, health and social services reform, please see

<https://alueuudistus.fi/en/frontpage>.

⁹ Institute for the Languages of Finland, *ibid.*, p. 25.

3. Widening the access to information principle to public services that are incorporated.

Language of the commitment as it appears in the action plan:

“To secure open and transparent decision-making the access to information principle will be widened to apply also to those public services that are produced in a company format.”¹

Start Date: Not identified

End Date: Not identified

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
3. Overall		✓	✓						✓	Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.					

Context and Objectives

This commitment seeks to ensure open and transparent decision-making in cases in which public services are produced in company format, as opposed to public services that are produced by government-run agencies. The pilot plans for Regional Government, Health and Social Services Reform include elements that indicate an increase in the role of public-private partnerships in the production of public services, making this commitment timely. This commitment addresses real concerns surrounding efficacy in the use of public funds, openness, and transparency.² In 2013, the Finnish government approved amendments to the so-called municipal (HE 32/2013)³ and competition (HE 40/2013) laws⁴ with the aim of improving competitive neutrality, in other words, to level the playing field between state-owned and private businesses. The amendments were prompted by two remarks by the European Commission in 2006 and 2010 concerning the distorting effect on free market competition that municipal enterprises like Destia (road and rail construction) and Palmia (food, real estate, cleaning, security and office space services) were causing in Finland. The amended municipal law obligates municipalities to incorporate their activities when said activities are conducted in a competitive market. The term “to incorporate” means the formation of a new corporation, which in turn means that its activities come to be conducted under the Limited Liability Companies Act. Because of this, the transition created new problems regarding transparency in the use of public funds. In 2016, a municipally owned construction company *Länsimetro Oy* did not disclose documents relating to a major expansion of the Helsinki Metro, invoking trade secret privilege, meaning that public officials did not receive up-to-date information on major delays and overspending.⁵

The access to information principle⁶ obliges Finnish public administration to make meeting minutes and documents relating to decision-making both publicly available and accessible. However, the access to information principle is currently interpreted as encompassing only government administration activities, and it does not consider incorporated activities. The conducting of government activities through or within limited liability companies “diminishes the transparency required for the use of public funds as well as the transparency of decision-making.”⁷ Therefore, the

commitment seeks to extend the access to information principle beyond its current scope to cover at least some company-format actors that produce public services.⁸

During the consultation period of the action plan, several CSOs remarked that the commitment lacks a responsible institution, information on a working group, and a clear schedule.⁹ If implemented, the commitment could have a high potential impact in preventing corruption and the misuse of public funds. However, although the commitment is timely, it does not directly address situations in which public services are outsourced to privately owned companies.¹⁰ A representative of Transparency International Finland was also concerned that the access to information principle would still not prevent companies from invoking trade secret privilege to conceal their procurement processes.¹¹

It should be noted that due to the uncertain status of the Regional Government, Health and Social Services Reform, the ultimate impact of this commitment is difficult to assess.¹² Whether the implementation of this commitment requires a change in law is currently under review by the Ministry of Justice.¹³ This review was scheduled to be completed by the end of 2018, but the Ministry of Justice had not completed it as of February 2019.¹⁴ Applying the access to information principle to company-format publicly owned companies could place publicly owned companies at a strategic disadvantage in the marketplace if privately owned companies lack similar standards of accountability as providers of outsourced public services. This might violate competition neutrality.¹⁵

Next steps

Due to the likely increase in company-format public services caused by the upcoming Regional Government, Health and Social Services Reform,¹⁶ the commitment's aim to expand openness and transparency for these operators is well timed. The government could identify the responsible institution and deadline for this commitment to improve its specificity.

The IRM researcher recommends that:

- The government ensure that the review by the Ministry of Justice is carried through;
- The government provide clarification as to whether outsourced public services produced by privately owned businesses are included in the scope of the commitment;
- Due to a likely increase in public-private partnerships and company-format public services in the production of public services Regional Government, Health and Social Services Reform on the way in which public services are to be provided, it might be worth extending this commitment to cover several action plans.

¹ Finland National Action Plan 2017-2019 (in English), https://www.opengovpartnership.org/sites/default/files/Finland_NAP_2017-2019_EN.pdf.

² Satu Grekin, Head of Business and Competition Affairs, The Federation of Finnish Enterprises. Email interview 11.02.2019.

³ Finlex, HE 32/2013, <https://www.finlex.fi/fi/esitykset/he/2013/20130032>.

⁴ Finlex, HE 40/2013, <https://www.finlex.fi/fi/esitykset/he/2013/20130040>.

⁵ Länsimetro salaa raportin kustannuksista ja viivästyksistä – taustalla oikeusoppineiden varovaisuus. 13.4.2017 <https://yle.fi/uutiset/3-9565887>. Kirsi Väättäminen, Lawyer, SOSTE Finnish Federation for Social Affairs and Health. Email interview 19.02.2019.

⁶ 12.4. Access to Information principle, <http://lainkirjoittaja.finlex.fi/12-yleislait-ja-eraat-yleiset-saantelyt/12-4/>.

⁷ Ministry of Justice, consultation 6.3.2017, p. 30, <https://avoinkirjoittaja.finlex.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.

⁸ "Social and health reform enterprises to be part of the access to information law." YLE News, published 13.8.2016, accessed 13.11.2018, <https://yle.fi/uutiset/3-9091215>.

⁹ Summary of comments on Finland's third national action plan submitted during the consultation period 2 February – 3 March 2017, p.30-38, <https://avoinkirjoittaja.finlex.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.

¹⁰ Kirsi Väättäminen, Lawyer, SOSTE Finnish Federation for Social Affairs and Health. Email interview 19.02.2019.

¹¹ Tommi Niinimäki, Chairperson of Transparency International Finland, consultation 3.3.2017, *ibid.* p. 31.

¹² Kirsi Väättäminen, Lawyer, SOSTE Finnish Federation for Social Affairs and Health. Email interview 19.02.2019.

¹³ Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland). Email interview 26.02.2019.

¹⁴ *Ibid.*

¹⁵ Kirsi Väättäminen, Lawyer, SOSTE Finnish Federation for Social Affairs and Health. Email interview 19.02.2019.

¹⁶ For more information on the Regional Government, Health and Social Services Reform, please see <https://alueuudistus.fi/en/frontpage>.

4. Strengthening the skills and knowledge of access to information legislation in the public administration

Language of the commitment as it appears in the action plan:

“Taking care of the know-how of the access to information legislation and of the legal praxis that guides its interpretation. This is a way to secure that the interpretation principles are as consistent as possible in the administration. Access to information needs to be the main rule also in practice. Here it is important however to note that there are special areas and special legislation, as an example the security issues of police related to general and individual security.

Supporting the know-how of access to information legislation by taking care that it is included in civil servants training and education. At the same time attention will be paid to understandability. Information is not genuinely public if it is not presented in an easy to understand way.”¹

Start Date: Not identified

End Date: Not identified

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
4. Overall	✓		✓				✓				Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

The commitment seeks to improve understanding of the access to information legislation and principle among government officials. According to two journalists interviewed for this report, there is a need for improvement in the application and know-how of access to information legislation.² According to the international ombudsman of the Union of Finnish Journalists, civil servants are sometimes unknowledgeable of access to information legislation or might interpret the law in a confused manner.³ Understandability of information is also an issue, along with long response times for access to information requests and potential high fees for information services.⁴

The commitment addresses the lack of know-how to respond to access to information requests in public administration and the issues surrounding understandability of information. However, it does not directly address the problem of long response times or the high fees associated with access to information requests. The commitment is not verifiable, and it concerns the inner workings of the government without a clear public-facing element. It could be made more concrete by identifying responsible agencies and specific milestones and by increasing its outreach through the inclusion of a public-facing element. The commitment addresses a specific problem in public administration. However, because it only seeks to ensure the adequate execution of the current legal standard, its potential impact does not go beyond minor.

Next steps

The IRM researcher suggests that:

- The government could provide indicators through which the completion of this commitment is measured, such as data on the decisions made by the Administrative Court on access to information requests.
- The government could collect feedback on government communication and access to information requests from the civil society and media organisation to better assess the impact of this commitment.⁵
- If this commitment is carried forward, the government could identify government agencies whose funding depends on access to information requests and seek to decrease this dependency.

¹ Finland National Action Plan 2017-2019 (in English),

https://www.opengovpartnership.org/sites/default/files/Finland_NAP_2017-2019_EN.pdf.

² Juha Rekola, International Ombudsman, The Union of Journalists Finland. Email interview 20.02.2019. Jyrki Räikkä, Journalist, Helsingin Sanomat. Member of the Open Government Support Group. Email comment 20.02.2019.

³ Juha Rekola, International Ombudsman, The Union of Journalists Finland. Email interview 20.02.2019.

⁴ Ibid.

⁵ Summary of comments on Finland's third national action plan submitted during the consultation period 2 February – 3 March 2017, p.38, <https://avoinhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.

5. Publishing state procurement data to citizens

Language of the commitment as it appears in the action plan:

“Publishing openly in the net the information regarding what the state buys, with what money and from where. The state procurement data will be published in spring 2017 as open data. At the same time, an open service will be created with access to everyone and where citizens and businesses can follow almost in real time the use of public money in state procurement. The contents of the service are the public data of procurement where it can be seen what state organisations are procurement and from where.”¹

Start Date: Not identified

End Date: Not identified

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
5. Overall		✓	✓			✓		✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

Although Finland ranks among the top 10 countries for the Open-Useful-Reusable Government Data Index,² open data on state procurement were not available before spring 2017. The information published under this commitment has been available to everyone in accordance with the Act on the Openness of Government Activities,³ but access to these data required a separate request for information from an individual organisation. This publication of state procurement information as open data is thus an innovative endeavour in Finland and internationally.⁴

This commitment aims to make state procurement data truly open and transparent, as well as visualize it in a clear and understandable manner, and to make it easier for individuals and organisations to assess whether the use of public funds is efficient and fit for purpose.⁵ The government discloses its procurement data on the level of individual invoices, and the data do not cover, for example, contracts.

Currently, the data cover nearly all government accounting units, except for the Ministry of Defence, whose procurement data are not public.⁶ The procurement data are available in non-proprietary open data format, granting it 3/5 stars on the 5-star deployment scheme for Open Data.⁷ The database is aimed to be updated weekly, although it seems to be done manually, and thus this target is not always met.⁸ Additionally, procurement data are visualized on the website Explore State Spending (tutkihankintoja.fi).⁹ This website provides accessible information on buyers and suppliers across multiple procurement categories.

Publication of government procurement data as open data was already included under Commitment 2 in Finland’s previous action plan, which was completed in September 2017. The novel part of the present commitment is the addition of the open access service (tutkihankintoja.fi). The government could have increased the ambition of the commitment by independently evaluating the usability and

impact of this service and by setting targets to improve its performance. The commitment is concrete and measurable, but because it was partially included in the previous action plan and already implemented, its potential impact is coded as minor.

Next steps

The IRM researcher recommends collecting feedback from stakeholders and end-users to ensure the continuing development of the visualisation along with the readability and usability of the open data. According to a CSO representative from the Federation of Finnish Enterprises, the current situation is satisfactory.¹⁰ Additionally, the commitment could be expanded to cover the procurement data of municipalities, regions, and incorporated public services.¹¹

¹ Finland National Action Plan 2017-2019 (in English),

https://www.opengovpartnership.org/sites/default/files/Finland_NAP_2017-2019_EN.pdf.

² Open-Useful-Reusable Government Data Index (OURdata), 2017,

https://www.oecd-ilibrary.org/governance/government-at-a-glance-2017/open-useful-reusable-government-data-index-ourdata-2017_gov_glance-2017-graph139-en.

³ Act on the Openness of Government Activities 21.5.1999/621, <https://www.finlex.fi/fi/laki/ajantasa/1999/19990621>.

⁴ "Julkiset, avoimet hankinnat," Juho Pursimo, Analyst for the Finnish government's central purchasing body Hansel Ltd, <https://www.hansel.fi/blogi/2017/11/29/julkiset-avoimet-hankinnat/>.

⁵ Satu Grekin, Head of Business and Competition Affairs, The Federation of Finnish Enterprises. Email interview 11.02.2019.

⁶ Finnish Central Government Procurement Spend, open data, https://www.avoindata.fi/data/en_GB/dataset/valtion-virastojen-ostolaskut.

⁷ 5 Star Open Data, <https://5stardata.info/en/>.

⁸ The log of activities shows that the dataset was updated six months ago, then again two months ago, https://www.avoindata.fi/data/en_GB/dataset/activity/valtion-virastojen-ostolaskut.

⁹ Explore State Spending, <https://tutkihankintoja.fi/?lang=en>.

¹⁰ Satu Grekin, Head of Business and Competition Affairs, The Federation of Finnish Enterprises. Email interview 11.02.2019.

¹¹ Tommi Niinimäki, Chairperson of Transparency International Finland, consultation 3.3.2017, p.54, <https://avoinhallinto.fi/assets/files/2017/06/Lausuntoyhteenvedo-III-toimintaohjelma.pdf>.

6. Making a clear and easy to understand description of the regional administration and clearly informing what changes due to the regional reform and why.

Language of the commitment as it appears in the action plan:

“During the regional reform, care will be taken that clear information about the content and reasons behind the reform will reach also those people who do not have a possibility to use electronic channels.

It will be tested with citizen, customer and expert groups whether the information and descriptions are easy enough to understand.”¹

Start Date: Not identified

End Date: Not identified

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?			
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major
6. Overall	✓		✓				✓				Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.			

Context and Objectives

The Regional Government Reform seeks to establish new regions in Finland and to transfer new duties to regional actors. If re-introduced, the reform will affect the structure, services and funding of the regions, especially in terms of health and social services, and it has the potential to affect all citizens in terms of where, when, and how they can keep using health and social services.² Whether and how this reform will be implemented remains subject to political debate.

This commitment aims to make the government decision-making process behind the reform clearer for all citizens, especially those who do not use electronic channels. It aims to improve citizens’ understanding of the contents of the reform by providing information through a variety of channels and by using clear language. Additionally, it plans to test the understandability of the information published. The commitment does not include any specifics on the type of information to be published, the channels to be used, or the planned tests and focus groups. Therefore, the potential impact is difficult to assess beyond minor.

The government has published information on the Regional Government Reform on the website omamaakunta.fi. This website is available in Finnish, Swedish, and English, along with multiple minority languages, including Finnish and Swedish sign language.

Next steps

The commitment suggests that its implementation would only begin during the regional reform – which is likely to be after the end of the action plan period. If the government aims to stretch this

commitment over several action plans, it should elaborate on it in the commitment and include at least one milestone for the ongoing two-year period.

The IRM researcher recommends the following steps for improving the specificity and potential impact of this commitment:

- Consulting with relevant CSOs and the public on the most crucial information needed on the reform and compiling a priority list for publication before the end of the current action plan. Special attention should be paid to the needs of those who do not have access to electronic channels and to determining the best channels to reach these target groups.
- Conducting a survey on the accessibility and clarity of published information during the next action plan, with special attention paid to the access to information for citizens via non-electronic channels.

¹ Finland National Action Plan 2017-2019 (in English),

https://www.opengovpartnership.org/sites/default/files/Finland_NAP_2017-2019_EN.pdf.

² For more information on the regional government, health and social services reform, please see

<https://alueuudistus.fi/en/frontpage>.

7. Organising training to actors of the regional administration about open government principles and ways of working.

Language of the commitment as it appears in the action plan:

“Updating the open government principles in co-operation to also cover the regional administration actors.

The material from the open government support package is used in the training as is also especially the experiences and practices of the region’s municipalities.”¹

Start Date: N/A

End Date: N/A

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
7. Overall		✓	Unclear				✓				Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment seeks to provide regional authorities with information and ways of working for improving participation and influencing opportunities for citizens and making these opportunities user friendly. The commitment seeks to expand principles of open government to cover new administrative structures created by the Regional Government, Health and Social Services Reform. The training package on these issues is organised by the Association of Local and Regional Authorities from March 2018 to December 2019.² This commitment aims to make use of the best practices and results documented in the open government support package.

The commitment aims to ensure inclusion of regional actors in open government once the regional reform has been implemented. It concerns the inner workings of the government and lacks a public-facing element. Overall, the commitment is not directly relevant to OGP values, as it does not elaborate on the goals of open government cooperation or the training. Therefore, as written, it is unclear what the potential impact this commitment could have in terms of opening government practice.

Next steps

The IRM researcher recommends either not carrying the commitment forward or increasing the ambition of the commitment by using any new regional administrative structures as a flagship for OGP values and activities.³ The ways of working of the regional administration could be based on and mounted to OGP values. If the commitment is carried forward, the government could ensure that it has a clear public-facing element along with specific measurements and milestones that are relevant to OGP values.

¹ Finland National Action Plan 2017-2019 (in English),

https://www.opengovpartnership.org/sites/default/files/Finland_NAP_2017-2019_EN.pdf.

² Avoin hallinto -uutiskirje/Kesäkuu 2018 <https://avoinhallinto.fi/assets/files/2018/07/Uutiskirje-kes%C3%A4kuu-2018.pdf>

³ Minna Sirnö, Head of Arts Promotion Centre Finland, consultation 3.3.2017, p. 24,

<https://avoinhallinto.fi/assets/files/2017/06/Lausuntoyhteenvedo-III-toimintaohjelma.pdf>.

V. General Recommendations

This section aims to inform development of the next action plan and guide implementation of the current action plan. It is divided into two sections: 1) IRM key recommendations to improve OGP process and action plans in the country or entity and 2) an assessment of how the government responded to previous IRM key recommendations.

5.1 IRM Recommendations

The Finnish OGP process for the third action has improved in terms of the action plan development. However, the commitments of the third action plan are less ambitious and concrete are than those of the previous action plan.¹

The IRM researcher notes that some of the commitments in the action plan (Commitment 4 and 7) continue to reflect the priorities of civil servants and focus on improving internal government processes without a clearly defined public-facing element. CSOs were involved in the design process, but evidence of civil society impact on individual commitments is limited, due to their vagueness and the lack of concrete milestones.

The following recommendations focus on improving commitment quality to ensure a higher potential impact. Out of the five key IRM recommendations, the first three relate to problems identified during the previous action plan cycle (2015–2017).

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

This recommendation is carried forward from the IRM assessment of the previous action plan. The IRM researcher recommends that the government could improve commitment quality through better problem-solution framing and by identifying verifiable milestones within the commitments. Measurable indicators and time frames should be set for each milestone. This could help the government produce an action plan that is ambitious, results-oriented, and specific enough to be verifiable. For example, Commitment 3 lacks a timetable, indicators, responsible institutions, and necessary details regarding its scope to allow for a full impact assessment.

Making commitments concrete would allow the multi-stakeholder forum to better assess commitment impact and influence commitment objectives during the co-creation phase, as called-for by stakeholders during the last consultation round of this action plan. The IRM researcher understands that these details have since been published elsewhere. However, the impact assessment of the commitments is based on how they appear in the action plan. The IRM researcher recommends using the OGP commitment template for the fourth action plan.

2. Increase high-level government representation in multi-stakeholder forum for a more ambitious action plan

To achieve a more ambitious action plan, the IRM researcher recommends that the government increase ministerial-level input in the multi-stakeholder forum. A stronger link to the executive branch of the government could address the issues of vagueness and unverifiability in the commitments.

3. Allow for greater civil society participation in shaping the final scale and scope of commitments

The IRM researcher recommends that the government could improve the participation opportunities for the civil society members of the MSF during the co-creation process. As mentioned, the civil society members raised the issues of vagueness and lack of responsible institutions for the commitments during the last round of consultations. The aim of the government could be to achieve a coding of “Collaborate” on the level of public influence

during the co-creation process (Table 3.1), which is currently coded at “Involve”. To achieve a higher coding, the government could allow for greater public and civil society influence beyond determining the major thematic focuses covered in the action plan and minor adjustments to commitment wording. Although the Finnish government incorporates CSOs into legislative processes to a high degree, the multi-stakeholder forum holds the potential to allow participation by organisations outside the established CSO representation in government activities.

4. Extend commitments related to the Regional Government, Health and Social Services Reform to cover several action plans

The IRM researcher recommends that those commitments, which relate either directly or indirectly to the Regional Government, Health and Social Services Reform, could be extended to cover the next action plan period (Commitments number 3, 6, and 7). If implemented, this reform will entail major administrative reorganisation, which could benefit from the incorporation of OGP values. It should be noted, however, that for these commitments to be relevant to the OGP values, they should include a public-facing element and have impact beyond internal workings of public administration. Commitment 3 seeks to address an issue that could increase in prominence following a wholesale public services reform, in other words, an increase in public services that are produced in a company format. Because of this, the IRM researcher recommends that this commitment be reframed to better address these developments and carried forward to the next action plan.

5. Assess the feasibility and legal status of proposed commitments during the action plan development

The fifth key recommendation relates specifically to a problem with Commitment 3, the feasibility of which remains unclear. If the commitments or milestones in future action plans might require changes in law, this should be assessed during the co-creation process, and indication of this deliberation should be included in the commitment text. If Commitment 3 is carried forward to the next action plan, the government should ensure that the legal evaluation by the Ministry of Justice is carried out as planned and taken into consideration to ensure this commitment’s feasibility.

Table 5.1: Five Key Recommendations

1	Improve commitment quality through better problem-solution framing, clarifying relevance to OGP values, and identifying verifiable milestones.
2	Increase high-level government representation in multi-stakeholder forum for a more ambitious action plan.
3	Allow for greater civil society participation in shaping the final scale and scope of commitments.
4	Extend commitments related to the Regional Government, Health and Social Services Reform to cover several action plans.
5	Assess the feasibility and legal status of proposed commitments during the action plan development process.

5.2 Response to Previous IRM Key Recommendations

Table 5.2: Previous IRM Report Key Recommendations

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

Out of the five IRM recommendations from the previous action plan period, the government did not integrate any into the current action plan. The current action plan's commitments still lack clarity, relevance, and verifiable milestones. The commitments are framed in broad terms without including concrete steps for solving or improving the identified problem. The timeline of each commitment is unidentifiable from the commitment text. There is no evidence of increased ministerial and cabinet-level leadership or of the employment of civil society partners in commitment monitoring.

The government aimed to supplement the current action plan with a more specific "implementation plan", including a timeline, responsible institutions, and milestones. Governments are permitted to officially submit revisions of their action plans before the end of the first year of implementation, including any changes, modifications, and additions, to the OGP Support Unit.² During the writing of this report (2019), the supplementary implementation plan was yet to be submitted, thus rendering it outside the scope of this report. The Ministry of Finance has, however, published up-to-date information on the implementation process for each commitment online.³ Although the practice gives transparent and accessible information on the action plan implementation, this "moving target" creates problems from the perspective of the IRM evaluation process. These problems could be countered by including this crucial information (timeline, responsible institutions, and milestones) in the action plan itself.

¹ "Independent Reporting Mechanism (IRM): Finland Progress Report 2015–2016," https://www.opengovpartnership.org/sites/default/files/Finland_Progress-Report_2015-2017_EN.pdf

² See the Open government Partnership's Government Point of Contact Manual https://www.opengovpartnership.org/sites/default/files/OGP_POC-Manual_2017_EN.pdf pg. 26. In Finland's case, this date would have been 30 June 2018.

³ "Implementation of Finland's third Open Government Action Plan," Ministry of Finance, February 2018. <https://avoinhallinto.fi/en/implementation/>

VI. Methodology and Sources

The IRM reports are written by researchers for each OGP-participating country or entity. All IRM reports undergo a process of quality control to ensure that the highest standards of research and due diligence have been applied.

Analysis of progress on OGP action plans is a combination of interviews, desk research, observation, and feedback from nongovernmental stakeholders. The IRM report builds on the evidence available in Finland's OGP repository (or online tracker),¹ website, findings in the government's own self-assessment reports, and any other assessments of process and progress put out by civil society, the private sector, or international organisations. At the beginning of each reporting cycle, IRM staff share a research plan with governments to open a seven-day period of comments or feedback regarding the proposed research approach.

Each IRM researcher carries out stakeholder interviews to ensure an accurate portrayal of events. Given budgetary and calendar constraints, the IRM cannot consult all interested parties or visit implementation sites. Some contexts require anonymity of interviewees, and the IRM reserves the right to remove personal identifying information of these participants. Due to the necessary limitations of the method, the IRM strongly encourages commentary during the pre-publication review period of each report.

Each report undergoes a quality-control process that includes an internal review by IRM staff and the IRM's International Experts Panel (IEP). Each report also undergoes an external review in which governments and civil society are invited to provide comments on the content of the draft IRM report.

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual.²

Interviews and stakeholder input

As part of this assessment, the IRM researcher conducted the following interviews by email:

- Satu Grekin, Head of Business and Competition Affairs, The Federation of Finnish Enterprises, 11 February 2019.
- Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland), 26 February 2019.
- Juha Rekola, International Ombudsman, The Union of Journalists Finland, 20 February 2019.
- Jyrki Räikkä, Journalist, Helsingin Sanomat. Member of the Open Government Support Group, 20 February 2019. Email comment.
- Sari Vapaavuori, Head of Development, Valli - The Finnish Union for Senior Services, 22 February 2019.
- Kirsi Väättä, Lawyer, SOSTE Finnish Federation for Social Affairs and Health, 19 February 2019.

About the Independent Reporting Mechanism

The Independent Reporting Mechanism (IRM) is a key means by which all stakeholders can track OGP progress in participating countries and entities. The International Experts Panel (IEP) oversees the quality control of each report. The IEP is composed of experts in transparency, participation, accountability, and social science research methods.

The current membership of the International Experts Panel is

- César Cruz-Rubio
- Mary Francoli
- Brendan Halloran
- Jeff Lovitt
- Fredline M'Cormack-Hale
- Showers Mawowa

- Juanita Olaya
- Quentin Reed
- Rick Snell
- Jean-Patrick Villeneuve

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

¹ Avoinhallinto.fi, <https://avoinhallinto.fi/en/home/>.

² IRM Procedures Manual, V.3 : <https://www.opengovpartnership.org/documents/irm-procedures-manual>

Annex I. Overview of Finland's performance throughout action plan development

Key:

Green = Meets standard

Yellow = In progress (steps have been taken to meet this standard, but standard is not met)

Red = No evidence of action

Multi-stakeholder Forum	
1a. Forum established: There is a forum to oversee the OGP process	Green
1b. Regularity: The forum meets at least every quarter, in person or remotely.	Green
1c. Collaborative mandate development: Members of the forum jointly develop its remit, membership, and governance structure.	Yellow
1d. Mandate public: Information on the forum's remit, membership, and governance structure is available on the OGP website/page.	Green
2a. Multi-stakeholder: The forum includes both governmental and non-governmental representatives.	Green
2b. Parity: The forum includes an even balance of governmental and non-governmental representatives.	Yellow
2c. Transparent selection: Non-governmental members of the forum are selected through a fair and transparent process.	Yellow
2d. High-level government representation: The forum includes high-level representatives with decision-making authority from government.	Yellow
3d. Openness: The forum accepts inputs and representation on the action plan process from any civil society or other stakeholders outside the forum.	Green
3e. Remote participation: There are opportunities for remote participation in at least some meetings and events.	Yellow
3f. Minutes: The OGP forum proactively communicates and reports back on its decisions, activities, and results to wider government and civil society stakeholders.	Green

Key:

Green = Meets standard

Yellow = In progress (steps have been taken to meet this standard, but standard is not met)

Red = No evidence of action

Action Plan Development	
4a. Process transparency: There is a national OGP website (or OGP webpage on a government website) where information on all aspects of the national OGP process is proactively published.	Green
4b. Documentation in advance: The forum shares information about OGP to stakeholders in advance to guarantee they are informed and prepared to participate in all stages of the process.	Green
4c. Awareness-raising: The forum conducts outreach and awareness-raising activities with relevant stakeholders to inform them of the OGP process.	Green
4d. Communication channels: The government facilitates direct communication with stakeholders to respond to action plan process questions, particularly during times of intense OGP activity.	Green
4e. Reasoned response: The multi-stakeholder forum publishes its reasoning behind decisions and responds to major categories of public comment.¹	Green
5a. Repository: Government collects and publishes a document repository on the national OGP website/webpage, which provides a historical record and access to all documents related to the national OGP process, including (but not limited to) consultation documents, National Action Plans, government self-assessments, IRM reports, and supporting documentation of commitment implementation (e.g. links to databases, evidence of meetings, publications)²	Green

If a country “meets” the six standards in bold, the IRM will recognize the country’s process as a Starred Process.

¹ Summary of consultation for Finland’s III. national action plan, <https://avoinkhallinto.fi/assets/files/2017/06/Lausuntoyhteenveto-III-toimintaohjelma.pdf>.

² The Open Government website, <https://avoinkhallinto.fi/>.