

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

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Executive Summary: Denmark

Denmark’s third action plan had similar thematic foci as previous plans: increasing open data, improving transparency in the public sector, and promoting open government globally. Civil society provided input during the co-creation process. However, the final commitments were proposed by government agencies, and most reflected existing initiatives. Future action plans could address higher-priority policy areas, such as the implementation of the European Union’s General Data Protection Regulation, beneficial ownership transparency, and whistleblower protection.

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. Denmark joined OGP in 2011. Since, Denmark has implemented two action plans. This report evaluates the design of Denmark’s third action plan.

General overview of action plan

Denmark’s third action plan focused on improving open data and public services domestically, as well as supporting anti-corruption and transparency efforts globally. Denmark continues to perform highly in open government and anti-corruption. However, Denmark could consider including other open government policy areas in future action plans, such as whistleblower protection and beneficial ownership.

The Agency for Digitisation (AFD) began the third action plan’s co-creation process with an online hearing, during which civil society, government institutions, and citizens were able to give input. Unlike the previous action plan’s co-creation process, this process featured the AFD’s follow-up of the online hearing with many in-person meetings with civil society organisations (CSOs) on potential action plan topics. In August 2018, after the co-creation process concluded, the AFD held Denmark’s first formal multi-stakeholder forum meeting (the OGP Network Meeting). The meeting included representatives from civil society and government agencies responsible for the action plan’s commitments.

Civil society representatives and the AFD discussed general ideas for action plan themes (such as public information and party financing), but CSOs did not formally submit


Table 1. At a glance
 Participating since: 2011
 Action plan under review: 3
 Report type: Design
 Number of commitments: 14

Action plan development
 Is there a multi-stakeholder forum: Yes
 Level of public influence: Involve
 Acted contrary to OGP process: No

Action plan design
 Commitments relevant to OGP values: 12 (86%)
 Transformative commitments: 0
 Potentially starred: 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?



commitment proposals. Ultimately, the commitments chosen for the action plan were proposed by government agencies and reflected existing government initiatives. According to civil society, the AFD’s mandate does not extend beyond a coordinating role, which limits the overall ambition of Denmark’s action plan. The government believed that the OGP process is not the proper forum for high-level policy discussion and that it could duplicate the existing efforts of individual ministries.

Some notable commitments involved developing data-driven solutions to issues of political and social relevance in Denmark, such as those providing historical data from the National Archives (Commitment 1) and those developing portals with information on day-care facilities (Commitment 3).

Table 2. Noteworthy commitments

Commitment description	Moving forward	Status at the end of implementation cycle
<p>1. More open data</p> <p>Publish datasets of historical significance in dialogue with stakeholders and provide video instructions on the use of this data.</p>	<p>Future action plans could improve access to historical data by addressing the timeliness of data publication, the European Union’s General Data Protection Regulation, and current Danish accessibility laws. The number of datasets could be expanded based on their usefulness to stakeholders.</p>	<p><i>Note: this will be assessed at the end of the action plan cycle.</i></p>
<p>3. Information portals for day-care facilities</p> <p>Develop a common platform to collect data from municipal and day-care institutions across the country. Present the data in publicly available and easily accessible portals.</p>	<p>This commitment’s model—focusing on a single issue of social relevance to the wider population—could be used for future action plans. For example, the government could consider developing a single platform to provide comparable information for various welfare issues.</p>	<p><i>Note: this will be assessed at the end of the action plan cycle.</i></p>
<p>9. National strategy for a stronger civil society</p> <p>Implement the national civil society strategy to improve collaboration between the public sector and civil society, particularly in local communities.</p>	<p>The government could build off the existing national civil society strategy to strengthen civic engagement at the decentralised level, particularly by promoting local voluntary social work.</p>	<p><i>Note: this will be assessed at the end of the action plan cycle.</i></p>

Recommendations

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

Table 3. Five KEY IRM Recommendations

1. Expand participation in the multi-stakeholder forum
2. Introduce whistleblower protection measures in the next action plan
3. Address the implementation of the General Data Protection Regulation
4. Take measures to improve beneficial ownership transparency
5. Focus on further strengthening foreign aid transparency

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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 if actions have made an impact on people's lives.

Denmark joined OGP in 2011. This report covers the development and design of Denmark's third action plan for 2017–2019.

The Independent Reporting Mechanism of OGP has partnered with Cordelia Chesnutt, 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 Denmark

Denmark continues to rank among the most open and least corrupt countries in the world. However, recent corruption scandals in both the public and private sectors have dominated the media and may affect public trust moving forward. While the action plan included commitments on Denmark's international efforts to promote openness, it did not sufficiently address potential areas for domestic reform.

Denmark has a long history of democracy and rule of law, and it continues to rank among the least corrupt and most open governments in the world. On Transparency International's Corruption Perception Index 2018, Denmark regained the first position with the lowest perceived levels of public corruption (scoring 88/100)—after ranking second in 2017.¹ The World Justice Project's 2015 Open Government Index named Denmark the fourth most open country after Sweden, Norway, and New Zealand.²

Denmark performs well on OGP's four eligibility criteria: access to information, fiscal transparency, public officials' asset disclosure, and citizen engagement.

Access to information: Denmark adopted freedom of information legislation through the Public Access to Administrative Information Act, No. 280, in 1970. The 1970 law was then replaced by the Danish Access to Public Administrative Documents Act, No. 572, in 1985.³ Controversial amendments introduced in 2014 (see previous IRM reports for discussion)⁴ prevent access to documents that are shared between cabinet ministers and advisers. Critics of the 2014 amendments expressed concerns that they restricted access to internal documents shared between ministries and their agencies or parliamentarians. Critics also thought the amendments would remove access to ministerial calendars.⁵ The ombudsman reviewed the Access to Public Administrative Documents Act in 2017 and in 2018 concluded that journalists often have to wait too long for responses to requests for information.⁶ Despite an apparent political majority for reform, the government decided in November 2018 not to pursue legislative reform of the act prior to elections (to be held no later than June 2019).⁷

Fiscal transparency: In Denmark, all budget proposals are placed on the public hearing portal (as are other legislative proposals). On occasions when budget proposals run up against hard deadlines (e.g., at the end of the year), the public hearing may happen concurrently with the submission of the budget proposal to the portal—and within a short timeframe. According to civil society representatives consulted by the IRM researcher, the overall priorities for the budget proposal are not considered at the public hearing. Such negotiations take place privately among government and parliamentary representatives before the results are presented to the public through the hearing process.⁸

Public officials' asset disclosure: Asset disclosure in Denmark is voluntary, and there are no specific laws that regulate conflicts of interest for members of parliament. Danish civil servants are not obliged to present sworn declarations of assets to a public authority or to provide disclosures of conflicts of interests. It is, however, mandatory for members of parliament (since 2016) to present sworn asset declarations and conflicts of interest declarations. These are published on Parliament's homepage.⁹ According to the European Research Centre for Anti-Corruption and State Building, the legitimacy of the disclosures is based on good faith, the information is not verified or controlled, and noncompliance is not sanctioned.¹⁰

Relatedly, Denmark has been criticised for its nontransparent rules on the financing of political parties. The European Council's Group of States against Corruption noted in a 2018 report that Denmark had implemented only six of the group's 14 recommendations from

2010. Those recommendations called for increased transparency regarding funding for parties and political candidates.¹¹

Anti-corruption: Section 122 of the Danish Criminal Code forbids bribery. Under this section of the code, those who commit bribery of foreign public officials and companies can be held criminally liable for acts of corruption.¹² Although the government enforces anti-corruption laws effectively, the country has recently experienced a number of corruption and money-laundering scandals. A scandal involving the Danish Bank (Danske Bank) made international headlines. In the fall of 2018, a \$234 billion money-laundering scandal at Danske Bank—among the largest scandals in European history and nearly equivalent to the size of the Danish economy—was revealed. The scandal involved misconduct from 2007 to 2015. As a result, the bank’s stock price fell about 30 percent.¹³

A British citizen, Howard Wilkinson, who headed the bank’s Baltic countries trading unit, exposed the scandal. The case has revealed the need to improve legal protection for whistleblowers. Wilkinson risks being prosecuted under Danish bank secrecy laws for sharing his information with the authorities. Denmark lacks a comprehensive law to protect whistleblowers from retaliation for speaking out. The current legislative framework for protection of whistleblowers is considered to be among the weakest in Europe. In the wake of the scandal, at least three political parties have called for better whistleblower protection, suggesting this legislative reform could garner majority support in Parliament.¹⁴

These cases have heightened general debate regarding public trust. According to one survey from October 2018, 74.3 percent of the population agreed that the many scandals have reduced their trust in public institutions.¹⁵ Conversely, a different survey showed that overall trust in public institutions rose slightly from 2017 to 2018. However, the same survey showed that parliamentarians were the least trusted group of public officials.¹⁶

The government continues to prioritise the digitisation of public services, pursuing many initiatives to allow citizens easier access to information. Several of these initiatives are reflected in the third action plan, including the data distribution platform Datafordeleren, an information platform for day-care facilities, better use of open data, and Open Data DK.¹⁷ The move towards digitisation has received a mixed response. In particular, the health care sector has been embroiled in accusations of excessive processing time, incorrect treatment, and disparate implementation.¹⁸

Moreover, public discussion continues regarding the trade-off between digitisation and the protection of personal information.¹⁹ The introduction of the European Union’s (EU) General Data Protection Regulation (GDPR) in May 2018 has added fuel to this debate, with many Danish private companies frustrated at its requirements. Also, some citizens find sites more complicated to use under the GDPR, with negligible improvements to their online safety.²⁰ This report therefore recommends that Denmark’s next action plan include a commitment to help businesses and citizens overcome challenges posed by GDPR implementation. For example, the plan could institute trainings and initiatives within government to ensure that open government efforts carry on unabated, despite the requirements of the GDPR.

Foreign Aid Transparency: Denmark has long been one of the top foreign aid donors in the world through the Danish Ministry of Foreign Affairs (MFA) and the Danish International Development Agency (Danida). In 2017, Denmark ranked fourth among the 29 countries in the Organisation for Economic Co-operation and Development’s Development Assistance Committee. It had allocated 0.72 percent of its gross national income to foreign aid. It ranked behind Sweden (1.01 percent), Luxembourg (1 percent), and Norway (0.99 percent).²¹ Denmark joined the International Aid Transparency Initiative (IATI) in 2008. It started publishing in the IATI Standard in 2012. According to the 2018 Aid Transparency

Index, compiled by Publish What You Fund (PWYF), Denmark's MFA has a "fair" rating, lagging behind the Swedish International Development Cooperation Agency, categorised as "good."²²

The Danish MFA publishes on a monthly basis to the IATI Registry data on all organisational planning indicators, as well as disaggregated budgets for three years. According to PWYF, Denmark does well on publishing development data indicators, namely aid type, finance type, flow type, and tied-aid status. However, tenders, contracts, and conditions are not published on the IATI Standard.²³ PWYF has recommended that the MFA improve the comprehensiveness of its data, publish performance data, and promote the use of data internally and externally.²⁴ The current action plan includes a commitment (14) that entails the upgrade of IATI reporting. With this upgrade, all organisations that receive grants from the MFA will have to report in the IATI standard format, improving the detail of disclosures.

Denmark has pursued some important transparency reforms outside of the OGP framework. For example, the Danish government has positioned itself as a global leader on beneficial ownership transparency. With the 2017 Act on Registration of Beneficial Owners, Denmark became one of few European countries in compliance with the EU's Fourth Anti-Money Laundering Directive. That directive seeks to make corporate structures more transparent and to prevent money laundering and terrorism financing.²⁵ The act establishes a public register of beneficial ownership, and the information is available under open license.²⁶ The act also requires businesses to disclose information on beneficial owners to the Danish Business Authority's Central Business Register.²⁷ Any company failing to do so can face compulsory dissolution.²⁸

¹ "Corruption Perception Index 2018," Transparency International, <https://www.transparency.org/cpi2018>; "Corruption Perception Index 2017," Transparency International, https://www.transparency.org/news/feature/corruption_perceptions_index_2017.

² "WJP Open Government Index 2015," World Justice Project, <http://data.worldjusticeproject.org/opengov/>.

³ "The Danish Access to Public Administrative Documents Act," Global Right to Information Rating, <https://www.rti-rating.org/wp-content/uploads/Denmark.pdf>.

⁴ Mads Kæmsgaard Eberholst, "Denmark: Independent Reporting Mechanism Status Report 2014-2015," Independent Reporting Mechanism, https://digst.dk/media/17719/27-og_denmark_2016_final.pdf.

⁵ "Freedom in the World: 2018 – Denmark," Freedom House, <https://freedomhouse.org/report/freedom-world/2018/denmark>; "Denmark Corruption Report," GAN Business Anti-Corruption Portal, <https://www.business-anti-corruption.com/country-profiles/denmark/>; and Kenneth Lund, "Folketinget har Vedtaget Omstridt Offentlighedslov," *Politiken*, 4 June 2013, <https://politiken.dk/indland/politik/art5456791/Folketinget-har-vedtaget-omstridt-offentlighedslov>.

⁶ "Ombudsmanden Efterlyser Reelle og Varige Forbedringer i Justitsministeriets Svartider i Sager om Aktindsigt," Parliament's Ombudsmand, 2 July 2018, https://www.ombudsmanden.dk/find/nyheder/alle/justitsministeriets_svartider_i_sager_om_aktindsigt/.

⁷ Ulrik Dahlin, "Regeringen Opgiver Revision af Offentlighedsloven," *Information*, 4 October 2018, <https://www.information.dk/indland/2018/10/regeringen-opgiver-revision-offentlighedsloven>.

⁸ Marina Buch Christensen (Transparency International Denmark), email with IRM researcher, 10 March 2019; and Niels Erik Kaaber Rasmussen (Open Knowledge Denmark), interview by IRM researcher, 1 November 2018.

⁹ "Regler om Registrering af Folketingsmedlemmernes Hverv og Økonomiske Interesser," Folketinget, <https://www.ft.dk/~media/pdf/hvervregister/regler-om-registrering-af-folketingsmedlemmers-hverv-d-.pdf.ashx>.

¹⁰ "Denmark Country Profile," European Public Accountability Mechanisms, http://europam.eu/?module=country-profile&country=Denmark#info_COI.

¹¹ Anders Reddar, "Danske Regler for Partistøtte får Igen International Kritik," *Altinget*, 7 June 2018, <https://www.alinget.dk/artikel/danske-regler-for-partistoette-faar-igen-international-kritik>.

¹² See (in Danish) "Oversigt," Retsinformation.dk, <https://www.retsinformation.dk/Forms/R0710.aspx?id=164192>.

¹³ Martin Selsoe Sorensen, "Danske Bank Says Billions May Have Been Laundered at Single Branch," *New York Times*, 19 September 2018, <https://www.nytimes.com/2018/09/19/business/danske-bank-money-laundering.html?module=inline>.

¹⁴ "Denmark Aims to Improve Whistleblower Protection Amid Danske Bank Scandal" *Reuters*, 20 November 2018, <https://www.reuters.com/article/us-danske-bank-moneylaundering/denmark-aims-to-improve-whistleblower-protection-amid-danske-bank-scandal-idUSKCN1NPIWT>.

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- ¹⁵ “Ugens Målinger: Svindelsager i det Offentlige har Tæret på Danskernes Tillid,” *Voxmeter*, 22 October 2018, <https://voxmeter.dk/ugens-maalinger-svindelsager-i-det-offentlige-har-taeret-paa-danskernes-tillid/>.
- ¹⁶ Niels Christiansen, “Tilliden til det Offentlige Stiger,” *Bias*, 11 October 2018, <http://bias.nu/tilliden-til-det-offentlige-stiger/>.
- ¹⁷ “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>.
- ¹⁸ “Sundhedsplatformen har Stort Potentiale – men den er Også Ramt af Store Problemer,” *Information*, 6 February 2018, <https://www.information.dk/indland/2018/02/sundhedsplatformen-stort-potentiale-ogsaa-ramt-store-problemer>.
- ¹⁹ Jakob Sorgenfri Kjær, “Danmark Får en Hær af It-Ekspertter, der Skal Beskytte dit Privatliv,” *Politiken*, 13 June 2017, <https://politiken.dk/indland/art5992124/Danmark-f%C3%A5r-en-h%C3%A6r-af-it-ekspertter-der-skal-beskytte-dit-privatliv>.
- ²⁰ Cathrine Lippert (Danish Technological Institute), interview with IRM researcher, 19 October 2018.
- ²¹ “Denmark Still among Top Aid Countries,” *CPH Post Online*, 10 April 2018, <http://cphpost.dk/news/denmark-still-among-top-aid-countries.html>.
- ²² “Denmark—Ministry of Foreign Affairs (MFA),” Publish What You Fund, <https://www.publishwhatyoufund.org/the-index/2018/denmark-mfa/>.
- ²³ *Ibid.*
- ²⁴ *Ibid.*
- ²⁵ “Beneficial Owners Must Now Be Registered,” Njord Law Firm, 16 October 2017, <https://www.njordlaw.com/beneficial-owners-must-now-be-registered/>.
- ²⁶ Aleks Knuutila, “New on the OpenOwnership Register—Data from the Danish Business Register Has Been Added,” *Open Ownership*, August 2018, <https://www.openownership.org/news/new-on-the-openownership-register-data-from-the-danish-business-register-has-been-added/>.
- ²⁷ International Business Company Formation, “Denmark Enacts Beneficial Ownership Legislation,” *WorldTax*, 21 August 2017, <https://www.worldtax.com/articles/denmark-enacts-beneficial-ownership-legislation.php>.
- ²⁸ “Danish National Statement Presented at the 18th International Anti-Corruption Conference (IACC),” International Anti-Corruption Conference, 22 October 2018, https://iaccseries.org/wp-content/uploads/2018/10/Denmark_National_Statement_2018.pdf.

III. Leadership and Multi-stakeholder Process

Responsibility for coordinating Denmark’s OGP efforts remains with the Agency for Digitisation in the Ministry of Finance. The third action plan’s creation included no direct high-level government representation. The government chose action plan commitments with input from civil society, and the first OGP Network Meeting was held in August 2018.

3.1 Leadership

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

Responsibility for Denmark’s participation in OGP remains with the Agency for Digitisation (AFD), located in the Ministry of Finance. The AFD has held this responsibility since Denmark first joined OGP in 2011. During the third action plan, Rune Møller Thomsen took over from Cathrine Lippert in 2016 to lead AFD’s coordinating work on OGP. The national budget contains no dedicated line for OGP activities beyond AFD’s general operating costs. (Such expenditures are primarily focused on staff costs for two employees and related expenses).

The OGP process does not currently involve the head of government. There has been no high-level government representation in the action plan’s creation or at OGP events during the 2017–2019 cycle.¹ As noted by the AFD, civic engagement in Denmark often takes place at the decentralised level, while major policy decisions are done at higher levels of government. The institutional setup for OGP in Denmark exists therefore at a mid-tier, coordinating level, and those responsible for OGP do not hold policy-making authority.² Commitments in the action plan mostly reflect existing initiatives. Furthermore, the OGP process rarely generates direct policy change, although suggestions can be carried up to higher levels of government.

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 a country or entity must meet in their action plan development and implementation to act according to OGP process. Denmark did not act contrary to OGP process.³

Please see Annex I for an overview of Denmark’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.⁴ 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
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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 August 2018, the Agency for Digitisation (AFD) organised the first multi-stakeholder forum (also known as the OGP Network Meeting). It also set up an online forum as a supplement to the physical meetings. The Danish OGP website provides meeting invitations, the agenda, and an account of the August meeting.⁵ The meeting occurred during implementation of the 2017–2019 action plan. It therefore did not directly affect the plan’s formulation, although many of the participants were also involved in the bilateral government-civil society process leading up to the plan’s development.

All members of the public were welcome to join the forum.⁶ Civil society representatives confirmed to the IRM researcher the government’s efforts to include as many interested parties as possible. They also noted that there are only a few civil society organisations involved in open government in Denmark.⁷ Participants at the August 2018 forum representing civil society came from Transparency International Denmark and Open Knowledge. Those representing government institutions responsible for implementing commitments came from the National Archives, the Ministry for Children and Social Affairs, the Ministry of Foreign Affairs, and the AFD.⁸ Following the forum, the AFD published meeting minutes online.⁹ Based on the proposals’ feasibility, timeliness, and relevance, suggestions were carried forward. These suggestions either were passed on within the government to relevant agencies or were kept for consideration in the next action plan.¹⁰

The meeting was held in Copenhagen. Moving forward, forum meetings could be organised in other regions of Denmark and could ensure representatives from Local Government Denmark.

Participation and engagement throughout action plan development

The consultation process for the development of the 2017–2019 action plan began with the Agency for Digitisation (AFD) organising an open online consultation on the public hearing portal¹¹ between 23 June and 20 August 2017. The AFD also initiated an online consultation at digitaliser.dk and invited key stakeholders to participate.¹² AFD outlined the consultation rules of the online hearing. The AFD invited all citizens, companies, nongovernmental organisations and public institutions and authorities at all levels to offer input and ideas for the third national action plan. However, responsibility for the plan’s formulation rested with the AFD.

The AFD noted that commitment suggestions should be based on existing work plans and financed within existing budgets.¹³ The AFD also established a debate forum at digitaliser.dk, and at a website on digst.dk, it provided information on timeframes, news, and the process. The AFD then conducted several in-person meetings with civil society organisation representatives on the action plan and Denmark’s OGP work in general. These meetings

involved Transparency International Denmark, the Centre for Public Innovation, Open Knowledge Denmark, and Aarhus Kommune. A news story was published shortly afterwards.¹⁴ The in-person meetings resulted from the AFD addressing a specific recommendation from the 2014–2015 IRM Progress Report.¹⁵

In the hearing, Open Data DK, the National Archives, and the government's Open Digitisation Community provided suggestions. The AFD conducted a preliminary evaluation of the suggestions' relevance against OGP criteria, leading the first two ideas to be converted into action plan commitments (1 and 5). The AFD did not incorporate the third proposal as a commitment. The commitment focused on open sourcing and coding, and the AFD considered it less relevant according to OGP criteria.

Civil society representatives chose not to submit specific, formal commitment proposals during the co-creation process. They instead focused on discussing with the AFD general ideas for action plan themes (such as public information and party financing).¹⁶

The final list of commitments was then carried forward internally to the deputy director level on behalf of the AFD, and those who had given suggestions were informed via email.¹⁷ Civil society representatives stated they received feedback on their general ideas for action plan topics.¹⁸ Thus, Table 3.1 on the level of public influence is coded as “involve.”

Government and civil society representatives agreed in interviews that it would be preferable to have broader civil society engagement. However, they acknowledged that there are few dedicated organisations on open government in Denmark. The IRM researcher therefore suggests widening civil society participation to organisations with single issue foci relevant to future action plans (e.g., health care, day care, corruption). The IRM researcher also suggests using social media outlets (such as the AFD LinkedIn or Twitter account) to increase participation in the OGP process.

According to civil society representatives, government representatives tend not to pursue the high-policy issues of interest to major civil society groups. The OGP government leadership does not pursue these issues (such as campaign finance reform or the public information act) because they do not have decision-making authority regarding them.¹⁹ The AFD expressed to the IRM researcher that expansion of the OGP process from coordination into policy discussion could duplicate existing efforts at the ministerial level and challenge the established democratic process.²⁰

Further, the AFD told the IRM researcher, the forum exists to gather ideas and input that may then be passed on to higher ranks of government.²¹ Several government agencies expressed to the IRM researcher that a more ambitious OGP process would require separate funding envelopes.²² AFD representatives, on the other hand, stated that ministries should be able to incorporate (new) OGP initiatives into existing budgets.²³

In sum, government agencies proposed all commitments chosen for the action plan, and most commitments reflected existing initiatives. The government invited civil society to consult on the development of the action plan. However, commitments were not driven by nongovernment agents, reflecting the government view that OGP in Denmark is a nonpolitical process. The institutional setup therefore continues to limit the ambition of the OGP process in Denmark beyond a coordinating process. Higher-level political engagement is needed for greater impact.

Co-creation and participation recommendations throughout development

Denmark showed evidence of achievement and strong performance in areas of multi-stakeholder forum conduct, and communication and outreach during development of the action plan. For example, the government provides information about the forum on its OGP

website. The forum includes both government and nongovernment representatives, and any member of civil society is welcome to join. Civil society representatives acknowledged the government's efforts to communicate news regarding OGP and action plan development.

Some areas where Denmark can improve are:

- High-level government representation: The forum includes high-level representatives with decision-making authority from government;
- Collaborative mandate development: Members of the forum jointly develop its remit, membership, and governance structure; and
- Parity: even balance of government and nongovernment representation.

In order to improve performance on these areas the IRM researcher suggests that moving forward, the following actions be taken:

- Consider raising the ambition level in OGP discussions to allow for “high policy areas” to be considered (e.g., party financing and freedom of information). This may require more attention from higher political levels. The IRM researcher therefore suggests inviting high-level decision makers to participate in the next forum, to allow for direct brainstorming.
- The government could consider bringing more civil society organisations into the forum discussion. For example, include organisations dedicated to key themes (such as the elderly, health, and the environment) and trade unions, in addition to those that focus on open government directly.
- The government could consider using social media outlets to broaden knowledge of and civic participation in its OGP work (e.g. through the AFD Twitter or LinkedIn pages).
- Consider proactively involving Local Government Denmark—representing the interests of Denmark's 98 municipalities—in the forum. This makes sense given that (a) much civic activity takes place locally; (b) decision-making power in Denmark is often decentralised; and (c) the umbrella nature of Local Government Denmark makes it an easy partner for the Agency for Digitisation in the OGP process, as opposed to engaging all individual municipalities.
- The government could consider clarifying its ambition level towards OGP and the multi-stakeholder forum. It could specify the conditions for acceptable policy issues (e.g., day care) as opposed to those that may be deemed too political (e.g., freedom of information and party financing).

¹ Andreas Meyer-Juhlin (Danish Agency for Digitisation), interview by IRM researcher, 9 October 2018; and Rune Møller Thomsen (Danish Agency for Digitisation), interview by IRM researcher, 2 November 2018.

² “Mid-term Self-Assessment Report on Denmark's OGP Action Plan 2017–2019,” Danish Agency for Digitisation, October 2018, <https://digst.dk/media/18356/mid-term-self-evaluation-of-ogp-action-plan-2017-2019.pdf>.

³ “IRM Procedures Manual, V.3,” Independent Reporting Mechanism, <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

⁴ “IAP2's Public Participation Spectrum,” IAP2, 2014, http://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/foundations_course/IAP2_P2_Spectrum_FINAL.pdf.

⁵ “Mid-term Self-Assessment Report on Denmark's OGP Action Plan 2017–2019.”

⁶ “OGP Netværksmøder,” Danish Agency for Digitisation, <https://digst.dk/strategier/internationalt-samarbejde/open-government/ogp-netvaerksmoeder/>.

⁷ Marina Buch Christensen (Transparency International Denmark), interview by IRM researcher, 24 October 2018; and Niels Erik Kaaber Rasmussen (Open Knowledge Denmark), interview by IRM researcher, 1 November 2018.

⁸ “OGP Netværksmøder.”

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- ⁹ “Notat,” Danish Agency for Digitisation, 23 August 2018, <https://digst.dk/media/17855/34-referat-fra-ogp-netvaerksmoede-d-22-august.pdf>.
- ¹⁰ Rune Møller Thomsen (Danish Agency for Digitisation), interview by IRM researcher, 2 November 2018.
- ¹¹ “Høring: Handlingsplan for Open Government 2017–2019,” Danish Agency for Digitisation, 23 June 2017, <https://hoeringsportalen.dk/Hearing/Details/60744>.
- ¹² “Mid-term Self-Assessment Report on Denmark’s OGP Action Plan 2017–2019.”
- ¹³ “Høringsmateriale: Handlingsplan for Open Government 2017–2019,” Danish Agency for Digitisation, 22 June 2017, <https://prodstoragehoeringspo.blob.core.windows.net/93863195-ef5d-4456-8f45-13c5fbad4fdf/H%C3%B8ringsmateriale.pdf>.
- ¹⁴ “Open Government,” Danish Agency for Digitisation, www.digst.dk/ogp.
- ¹⁵ Mads Kæmgaard Eberholst, “Independent Reporting Mechanism (IRM) Progress Report 2014–2015: Denmark,” Independent Reporting Mechanism, https://en.digst.dk/media/17717/26-denmark_irm-progress-report-2014-15_final_eng.pdf.
- ¹⁶ “Mid-term Self-Assessment Report on Denmark’s OGP Action Plan 2017–2019.”
- ¹⁷ Rune Møller Thomsen (Danish Agency for Digitisation), interview with IRM researcher, 2 November 2018; and Rune Møller Thomsen (Danish Agency for Digitisation), email with IRM researcher, 19 November 2018.
- ¹⁸ Marina Buch Christensen (Transparency International Denmark), interview by IRM researcher, 24 October 2018; and Niels Erik Kaaber Rasmussen (Open Knowledge Denmark), interview with IRM researcher, 1 November 2018. Note that the representative from Transparency International wished to code this table as “consult,” whereas the Open Knowledge Denmark representative expressed a preference for “involve.” Because most stakeholders agreed that the Agency for Digitisation provided feedback on suggestions, the IRM researcher chose to code this table as “involve.”
- ¹⁹ Marina Buch Christensen (Transparency International Denmark), interview by IRM researcher, 24 October 2018; and Niels Erik Kaaber Rasmussen (Open Knowledge Denmark), interview by IRM researcher, 1 November 2018.
- ²⁰ Rune Møller Thomsen (Danish Agency for Digitisation), interview by IRM researcher, 2 November 2018.
- ²¹ Ibid.
- ²² Birgitte Kjærgaard (Aarhus Kommune), interview by IRM researcher, 30 October 2018; and Nanna Skovgaard (Ministry of Health), interview by IRM researcher, 30 October 2018.
- ²³ Rune Møller Thomsen (Danish Agency for Digitisation), interview by IRM researcher, 2 November 2018.

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 programmes.

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 signed by all OGP-participating countries.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 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:
 - 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 impact 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?

A potentially starred commitment has more potential to be ambitious and to be implemented. A good commitment is one that clearly describes the:

1. **Problem:** What is the economic, social, political, or environmental problem? Rather than describing an administrative issue or tool (e.g., ‘Misallocation of welfare funds’ is more helpful than ‘lacking a website.’).
2. **Status quo:** What is the status quo of the policy issue at the beginning of an action plan (e.g., “26 percent of judicial corruption complaints are not processed currently.”)?
3. **Change:** Rather than stating intermediary outputs, what is the targeted behaviour change that is expected from the commitment’s implementation (e.g., “Doubling response rates to information requests” is a stronger goal than “publishing a protocol for response.”)?

Based on these criteria, Denmark does not have any potential starred commitments.

Starred commitments

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.
- The government must make significant progress on this commitment 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

Denmark’s 2017–2019 national action plan focused on four key themes: (a) more and better open data (Commitments 1–5), (b) tailored data to ensure a basis for citizen participation (Commitments 6–8), (c) working together for a better public sector (Commitments 9–11), and (d) a global effort for openness (Commitments 12–14).

¹ “Open Government Partnership: Articles of Governance,” Open Government Partnership, 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,” Open Government Partnership, <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

Theme I: More and better open data

Commitment I: More open data for citizens and media

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

“The Danish National Archives will, in dialogue with OGP stakeholders (potential users and competent persons) select 10 data sets (archive versions) within certain social themes (labour market, environment, traffic, energy supply, health, etc.) This data will be made searchable and ready for download, by means of a publicly available data catalogue.

On its website www.sa.dk, the Danish National Archives will present itself as a contributor to the national OGP initiative and create an “inspiration page” to support the active use of open public data by citizens and media within the selected themes. The Danish National Archives will also be offering instruction to users in relation to the specific use of data. The Danish National Archives will mark the launch of the data and inspiration page with a short video that will present the OGP objective and will demonstrate open data in active use, based on accessible data and the inspiration site.”

Milestones:

- I.1 Selection of ten data sets in dialogue with stakeholders
- I.2 Clarification of needs in relation to IT support for searches and accessibility in a freely available data catalogue
- I.3 Publication of data in a freely available data catalogue
- I.4 Presentation of OGP initiative on the Danish National Archives website, including setting up a page as inspiration for the use of data
- I.5 Production of presentation video of the Danish National Archives OGP initiative

Start Date: 1 August 2017

End Date: 1 June 2019

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, p. 8.

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

The National Archives possesses a wealth of data on various social issues (e.g., labour market, environment, traffic, energy supply, health). This information previously has been inaccessible to the public and media due to issues of personal security and confidentiality, and accessibility laws. The commitment aims to improve citizens' and the media's access to a specific collection of documents and data of historical significance and to peak their curiosity towards this information. Towards this goal, the National Archives proposed to select 10 datasets within specific themes, in coordination with OGP stakeholders. It also planned to clarify the information technology needs for easy data catalogue searches. Finally, the National Archives intended to publish data and present the initiative on its website, including a video to support a user-friendly experience.

The commitment emphasises open and transparent data collection and therefore supports the OGP value of access to information. With the ambition of producing a data catalogue for the website, a video, and an inspiration site to boost the public's use of the open data catalogue, the commitment also supports the OGP values of inclusion, technology, and innovation.

The National Archives considered the initiative's inclusion in the action plan a strategically important way to shape the agenda on open government. It is particularly important for an institution rarely at the forefront of the national debate. According to the National Archives, this initiative stands as an example of self-motivation, as Denmark's OGP action plan encouraged more work on open government within the administration. The National Archives representative suggested to the IRM researcher that a revision of the National Archives Act would help reduce the amount of time (20 years) required before certain documents become publicly available. The representative also stated that the European Union's General Data Protection Regulation (GDPR) has limited the amount of data the Archives can make available to the public.¹

The IRM researcher considers this commitment verifiable in that most of the milestones are concrete (e.g., selection of 10 datasets, publication of presentation video). Milestone 1.2 on "clarification of needs in relation to IT support" seems less specific compared to the others. Successful implementation will depend on the amount of data that is released and how useful the presentation video is to the general public.

Regarding potential impact, this commitment will have a moderate effect. It may open government to citizens and media and allow for historically significant information to be more accessible than previously. The National Archives chose the 10 datasets in dialogue with OGP stakeholders (potential users and specialists) within specific themes (e.g., labour market, environment, energy). Through the online availability of these datasets, the Archives seeks to increase public access to national history, not ensure direct policy implications. The commitment's use of technology and innovation in connection with government data could have a positive impact on data access. However, the Archives would need to engage in dissemination efforts for the general public to become aware of the datasets' existence.

Next steps

The IRM researcher recommends that the commitment be prioritised and continued in the next action plan. Specifically, the IRM research recommends that:

- A dissemination and communication campaign be prepared to make the general public aware of how to access historical data through the National Archives' inspiration webpage and presentation video;
- A video course be developed, in line with the presentation video, to be shared with universities across Denmark, thereby engaging students who have an interest in open government in OGP;

- A user survey be produced, drawing out potential data catalogue users (from the public or media) and examining how the choice of datasets works and if information is easily accessible;
- The number of datasets be expanded if stakeholders agree that the publication of the first 10 has been successful and useful; and
- A commitment be established in the next action plan regarding the GDPR and its effect on open government in Denmark; the commitment can also address current Danish accessibility laws that require 20 years to pass before certain sensitive documents can be released.

¹ Anne Sofie Fink Kjeldgaard (National Archives), interview by IRM researcher, 30 October 2018; and “Bekendtgørelse af Arkivloven,” Retsinformation, <https://www.retsinformation.dk/eli/ta/2016/1201>.

Commitment 2: Basic data registers will be made available on a shared public distribution platform

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

“With its basic data programme in 2012, a unified public sector took on the task of refining Denmark’s digital raw material. Consistency and quality of basic data about persons, enterprises, geography, addresses and real estate properties have since been improved by standardising data formats, increasing the quality of data and presenting data on one common platform. In 2017 and 2018, a large amount of this basic data will be available on the new data distribution platform, which is called “Datafordeleren”.”

Milestones:

- 2.1 Real estate basic data on the Data Distributor
- 2.2 Basic data about persons on the Data Distributor
- 2.3 Basic enterprise data on the Data Distributor
- 2.4 Address basic data on the Data Distributor
- 2.5 Geo ground data on the Data Distributor

Start Date: 3rd quarter 2017

End Date: 2nd quarter 2018

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 9–10.

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

The Basic Data Programme (2012) sought to refine Denmark’s digital raw material to increase the consistency and quality of data about persons, enterprises, geography, addresses, and real estate. In 2017 and 2018, significant amounts of data are expected to be available on the new data distribution platform, called the Data Distributor.¹ The platform will make such information available on one common website. Previously, citizens or enterprises may have experienced a confusing process in which they had to submit the same information on several different websites. This commitment aims to enable authorities to

register data in one place and to improve and manage inter-agency data. Thus, the data will be standardised and able to be combined and made available in different combinations. Furthermore, the commitment aims to make it easier for citizens and businesses to access information. The commitment also has the potential to improve the use of technology and innovation for transparency and accountability by using an electronic platform for the storage and use of this data.

This commitment is likely to be easily verifiable, as the five milestones all relate to data being placed on the Data Distributor. However, the terms in the milestones are not all clearly defined (e.g., “geo ground data”). The commitment describes “basic data” as data relating to “individuals, businesses, geography, addresses, and properties.” However, it does not explain what kind of data this refers to.

The IRM researcher finds that the commitment could have a minor potential impact on larger social, political, or environmental problems, as it mainly seeks to streamline the use of information. Moreover, the process by which data will be made available on the platform could be further explained.

Next steps

Based on the analysis above, the IRM researcher recommends the following next steps:

- The AFD could carry out an information campaign for companies and citizens to demonstrate cases involving data that could be more easily available. This could be of interest for larger companies and data start-up companies.
- Since the commitment is already underway, the IRM researcher recommends not carrying this initiative forward to the next action plan.

¹ “Grunddata—Hvad er Grunddata,” Danish Agency for Digitisation, <http://grunddata.dk/hvad-er-grunddata>.

Commitment 3: Information portals for day-care facilities

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

“One unified platform will be developed in the form of an information portal that collects data from local governments and day-care facilities across the country and presents this data publicly and easily accessible, i.e. in so-called dashboards, so that parents can make an informed decision based on the factors that matter the most to their family.

The development of the information portal will be done in several stages:

A feasibility study will be carried out in autumn 2017 to identify the information about day-care facilities that are most in demand, and whether they can be integrated into the portal. The results of the pre-analysis will be available in October 2017.

Once the results of the feasibility study are available and a decision has been made as to which types of information the portal is to show, the technical development of the portal will commence. This development is expected to run from the end of 2017 up to and including the first six months of 2018.

The intent is to launch the information portal before the end of the 3rd quarter of 2018 with selected key figures for information broken down at municipal level.

Continuous efforts will be undertaken to make the information available at institution level as well and, where possible, at unit level. However, in order to succeed, existing data from various registers will need to be compiled accurately. It is expected that an institutional register can be established during 2019.”

Milestones:

- 3.1 Preliminary analysis
- 3.2 Technical development of the portal
- 3.3 Launch of the daytime childcare portal
- 3.4 Establishment of the new daytime childcare register

Start Date: July 2017

End Date: 2019

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 11–12.

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

On 9 June 2017, the Danish People’s Party, the Social Democratic Party, and the Social Liberal Party joined in an agreement called “Stronger day care options—all children must be part of the collective.” The agreement contains 24 initiatives (from three focus areas) intended to give families with children more flexibility and choice. The three areas of emphasis are (a) increased flexibility and choice, (b) the welfare and learning of children, and (c) professionalism and clear leadership.

Commitment 3 of Denmark’s 2017–2019 action plan constitutes one element of the “Stronger day care options” agreement, emphasising that day-care facilities must “contribute to safe and good conditions for families, safe and stimulating teaching environments and coherent progress for the children.”¹ This agreement gives day-care facilities roles as active agents in making sure parents can access information on the institution that is best suited for their families.

The commitment aims to develop a common platform that will collect data from municipal and day-care institutions across the country. This data will be presented on publicly available and easily accessible portals, called dashboards. With this data, parents will be able to choose day care based on sufficient information. Through the platform, the government intends to provide transparency and give access to open data. It also hopes to provide a better communication method for relevant information on day-care institutions. The initiative is relevant to the current domestic political debate, as the quality of welfare institutions (including day care, elderly care, health care) and the corresponding level of taxation is a vigorously debated topic.²

In terms of OGP values, this commitment increases the public’s access to information by providing further details on day-care choices. It also employs technology and innovation to increase transparency and accountability. The commitment is not coded as relevant to civic participation, as the data for the day-care portal does not appear to have been gathered through consultation with the public.

The commitment is verifiable, as the main milestone concerns the establishment of the day-care information portal. There could be more specificity in the milestones, however, regarding the technical development of the portal and the preliminary analysis. Further, it is not clear which stakeholders are responsible for developing and completing the different stages and milestones of the initiative.

The Ministry for Children and Social Affairs has been collaborating with Local Government Denmark and the Union of Pedagogues in the development and implementation of this initiative. (In the future, other OGP initiatives could follow this example of local-national

collaboration.) The single-issue focus on day care may stimulate interest among the general population in this particular initiative. Thus, for future OGP commitments, this initiative could also be a model for engaging civil society in a more dynamic way than through general digitisation initiatives.

The IRM researcher considers the potential impact of the commitment to be moderate. The provision of data from local governments and day-care facilities may improve access to information and make it easier for parents across the country to make informed decisions about day-care facilities. Moreover, the commitment corresponds to a theme that is of high importance in Danish society. Thus, it is relevance to the Danish national action plan and to OGP's involvement overall.

Next steps

The IRM researcher recommends the following:

- Increase cooperation between the Ministry for Children and Social Affairs and the Agency for Digitisation, to unify various data-driven initiatives and develop a single platform that may provide comparable information across various welfare issues (e.g., day care, health care, elderly care).
- Invite Local Government Denmark representatives to the multi-stakeholder forum to ensure that the Danish OGP process has consistent input from the decentralised level.
- Since the commitment is virtually completed, the IRM researcher does not recommend that it be carried forward into the next action plan. The IRM researcher does recommend, however, that this commitment's model—with its focus on a single issue of political and social relevance to the wider population—be used as inspiration for future initiatives in Danish OGP action plans.

¹ "Stærkere Dagtilbud—Alle Børn Skal Med i Fællesskabet," the Danish Government, 27 April 2017, <https://www.regeringen.dk/publikationer-og-aftaletekster/staerke-dagtilbud-alle-boern-skal-med-i-faellesskabet/>.
² Morten Nielsen, "Fire Tiltag og en Milliard Kroner Skal Gøre Børns Første 1000 Dage Bedre," Tv2, 24 August 2018, <http://nyheder.tv2.dk/politik/2018-08-24-fire-tiltag-og-en-milliard-kroner-skal-goere-boerns-foerste-1000-dage-bedre>.

Commitment 4: Better use of open data and Smart City Forum

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

“The commitment involves implementation of various initiatives divided into several projects to support local governments’ work with open data and to increase use of open data:

- Assistance to local governments
- Support publication and standardised displaying of data
- Increase transparency and opportunities for businesses and citizens to use data
- Knowledge sharing of new, data-driven solutions”

Milestones:

4.1 Completion and implementation phase

Start Date: April–May 2017

End Date: 2020

Editorial note: The commitment text above has been shortened for the purposes of this report. For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 12–13.

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 provision of datasets for enterprises, citizens, and other public bodies can create opportunities for increased growth and innovation in society. Open public data will be used as raw material for the development of applications and services. Smart City is a broad concept that covers the use of technology, data, and partnerships to improve urban infrastructure through data. Examples of Smart City issues include waste management, air pollution, and traffic initiatives.¹

The Smart City initiative covers a range of projects intended to support municipalities’ work with open data; the presentation of, transparency regarding, and the ability to use data; and knowledge sharing. Activities include introductory events to explain to citizens how to use

Smart City, the development of a Smart City map of Denmark, best practice guidelines, workshops about relevant themes, and collaboration with schools and universities.

Another project focusing on better use of municipal data is expected to include open data introduction seminars, “data days,” and options for making common municipal datasets available. Through this initiative, the government hope to provide more open municipal data and encourage civil society to use this data, for increased participation.² The description of the commitment refers to a range of implementation activities to encourage civic participation.

This commitment aims to increase access to information by opening data, publishing data, and standardising data display. The initiative also supports the use of technology and innovation for transparency and accountability.

This commitment is well underway. It is referred to and discussed in the media. However, its milestones are not specific (e.g., “completion and implementation phase”) and the vague description of the content (e.g., “support to municipalities”) also complicates verifiability.

The IRM researcher considers the potential impact of this commitment to be minor. The initiative can potentially serve to strengthen municipalities’ use of open data, and thereby benefit citizens. However, the commitment text could more strongly explain how citizens are expected to access and engage with the open data.

Next steps

- Since this commitment is already significantly underway, the IRM researcher suggests that this commitment not be carried forward to the next action plan.
- The IRM researcher does suggest, however, that stakeholders from this initiative participate in the next OGP multi-stakeholder forum to share lessons learned on open data and citizen engagement. This will be informative for several Danish action plan commitments that involve open data.

¹ Laurids Hovgaard, “Kommunale City Projekter Stikker i Alle Retninger: Fra Normalisering af Sensordata til Nye Datamodeller,” Version 2, 8 October 2018, <https://www.version2.dk/artikel/kommunale-smart-city-projekter-stikker-alle-retninger-normalisering-sensordata-nye>.

² “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, p. 12.

Commitment 5: Open Data DK

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

Open Data DK helps local governments and regional governments get started working with open data. It is a new area in many local governments and regional governments so it may be difficult to get the process started. Open Data DK provides a framework for knowledge sharing about open data between public authorities – and businesses.

The purpose is to create transparency in the public administration and provide a basis for data -driven growth by making data freely available for public authorities, private businesses and civil society in general. Municipal and regional data is made open and freely available on a shared data platform (open source) so that it can be easily accessed and used as raw material in the development of applications and services, or serve as the foundation for analyses, trend assessments, research, etc. Open data can create increased transparency in the public administration so that citizens and businesses can become even more active coplayers in their local democracy.

In autumn 2017 and in 2018, a number of initiatives will be put in place to promote publication and use of public data. The initiatives include:

- Information meetings for local governments and regional governments, which deal specifically with releasing the data which the local governments/regional governments possess: How to get started? What potential does public data hold?
- Individual introduction meetings for local governments and regional governments
- Updating and development of existing guidelines
- Inspiration and dialogue meetings with businesses
- Development of the open data platform, which serves to make it easier to release and use data, e.g. with focus on standardisation of data
- Collaboration with educational institutions

Open Data DK is organised with a board and a number of working teams that promote sharing among its members. It also focuses on regional/local needs, which means that Open Data DK's finances are organised so that funds are earmarked for regional initiatives. This makes it possible to have an overall regional focus on tourism data in all of North Jutland and mobility data in all of East Jutland. Currently participating in the commitment are: 31 local governments, 3 regional governments and partners such as the Danish Business Authority, Local Government Denmark, GeoFyn and GeoSjælland. Besides the participation of public authorities, considerable focus is aimed at including businesses and citizens, e.g. in the form of dialogue meetings, hackathons, data drinks¹ and collaboration with educational institutions.”

Milestones:

- 5.1 60 local governments have joined Open Data DK
- 5.2 4 regional governments have joined Open Data DK
- 5.3 7 dialogue meetings have been held
- 5.4 Study related to mapping tool (standardisation) has been initiated

Start Date: 2016

End Date: Unspecified

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 14–16.

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

This commitment seeks to improve transparency in public administration and allow for data-driven growth through the provision of free data for civil society, private business, and public authorities. The initiative provides municipal and regional data on a shared open-source data platform. This data can be used in applications and services, analyses, and research.

Specific solutions proposed through Open Data DK include information meetings for local and regional governments, individual introductory meetings, updates of existing guidelines, inspiration meetings with businesses, development of the open data platform, and collaboration with educational institutions.

Open Data DK has a regional concentration, including a focus on tourism data in North Jutland and mobility data in East Jutland. Thirty-one local governments, three regional governments, and a variety of partners (including the Danish Business Authority, Local Government Denmark, Geo Fyn, and GeoSjælland) participate in the initiative.

Analysing the commitment in the context of OGP values, the seven dialogue meetings, as well as the anticipated hackathons and “data drinks,” aim to involve citizens, businesses, and educational institutions in the development of Open Data DK. The commitment therefore has the potential to strengthen civic participation. The commitment aims to make extensive use of technological innovation, which may further advance transparency in public administration.

The IRM researcher considers the commitment specific enough to be verifiable, because its milestones are concrete. (This is the case regarding the number of local and regional governments expected to join Open Data DK, the number of dialogue meetings, and whether a study related to the mapping tool has been realised.)

The IRM researcher considers the potential impact of the initiative to be minor. While the engagement with start-up communities and private businesses constitutes a positive step for open government, the scope of the milestones, as described, centre mostly on intra-governmental coordination and organisation.

Next steps

- The IRM researcher recommends that, moving forward, commitments that are similar in nature (such as Commitments 4 and 5 on open data) be joined together,

to give citizens a more comprehensive overview of government efforts on a particular theme.

- Since the commitment is already significantly implemented, the IRM researcher suggests that this commitment not be carried forward to the next action plan.
- The IRM researcher recommends that future commitments focus more on strengthening civil society engagement, rather than intra-governmental processes.

¹ A “data drink” refers to an event during which coders, programmers, public employees, designers, academics, entrepreneurs, and students meet over a drink to discuss cases and scenarios regarding open data. See, for example, “Aarhus Data Drinks,” Alexandra Instituttet, <https://alexandra.dk/dk/aktuelt/arrangementer/2013/aarhus-data-drinks-2>.

Theme II: Tailored data to ensure a basis for citizen participation

Commitment 6: Overview of own cases and benefits

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

A joint-public reference architecture will be developed for the case and benefits overview. Use of the joint public architecture will create coherence in data display across Danish authorities so that citizens can, for example, get an overall overview of cases and benefits managed by various authorities. This will allow the authorities to develop overview solutions individually and jointly. The national portals, borger.dk and VIRK are required to display the data that authorities wish to display via the overview.

From 2017, a joint-public reference architecture will be developed for authorities to use. In 2018 and until 2020, authorities will use pilots to develop the overview and display relevant data to citizens and businesses.

Milestones:

- 6.1 Analysis of users' needs
- 6.2 Development of reference architecture
- 6.3 Implementation of pilots in collaboration with the authorities, in order to test architecture and concepts for user interfaces
- 6.4 Implementation of the initiative to be agreed with partners in further detail

Start Date: October 2016

End Date: December 2020

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 17–18.

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
6. Overall		✓	✓			✓		✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment relates to the government’s overall openness agenda. It aims to address the problems citizens have with requests for status updates on their cases with the public sector (e.g., payment of benefits). With the initiative, the authorities also seek to provide improved service through personalised data. The initiative aims to provide a common public sector overview of cases and services, to allow for easier access to information and increased security in dealings with the public sector. The Agency for Digitisation (AFD) also expects the commitment to lead to fewer case status calls from citizens, thus allowing authorities more time for other tasks. Since the initiative was included in the 2017–2019 national action plan, the AFD considers the topic to be on the political agenda. The prioritisation of this topic reflects the government’s broader goal of reducing inefficiency in the public sector and reform of the sector.¹

Analysing the commitment in the context of OGP values, this initiative can potentially provide citizens with access to better and more information on their own cases related to the public sector. The commitment also uses technology and innovation to bolster transparency.

The verifiability of this commitment, as designed and described in the action plan, is not specific. For example, it would be useful to further describe what is meant by “an overview of cases and services” and “solutions.” Furthermore, the milestones refer to “users’ needs,” which warrants further explanation. However, the milestones are generally verifiable.

The IRM researcher judges the potential impact of this initiative as minor, given the challenges around verifiability and the limited scope of direct citizen engagement in the initiative. The expectation that “authorities will experience fewer calls” as a result of this initiative indicates that the goal exists more to increase efficiency in the public sector than to open the sector for citizens.

Next steps

The IRM researcher recommends the following:

- The AFD could pursue a communication campaign for this commitment—and other digitisation commitments—to ensure that citizens are aware of their development.
- A future iteration of this commitment could go further than access to information by strengthening its focus on how citizens can hold government accountable for not responding to requests in a timely manner.
- Municipalities and regions could be increasingly involved in the upcoming OGP multi-stakeholder forums, given the importance of local authorities to the success of this commitment (and others) and their more direct contact with civil society.

¹ Anna Louise Madsen (Danish Agency for Digitisation), interview by IRM researcher, 2 November 2018.

Commitment 7: Nationwide deployment of telemedicine

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

The Government has reached an agreement with Local Government Denmark and Danish Regions that telemedicine for pregnant women experiencing complications and patients with COPD will be provided as a treatment option country-wide.

Milestones:

- 7.1 Telemedical solution for patients with COPD has been purchased and is ready for operation
- 7.2 Telemedicine for patients with COPD is widespread nationwide
- 7.3 Telemedicine for pregnant women with complications has been disseminated to all maternity departments

Start Date: 1 July 2017

End Date: 31 December 2020

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 18–19.

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	✓		✓			✓	✓				Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

According to the commitment text, Danish citizens increasingly demand to be involved in their own medical treatment and demand that it be adapted to their needs. Demographic changes are seen as affecting the health care system, as more people demand treatment while government resources remain the same.

This commitment’s solution involves offering telemedicine to patients with chronic obstructive pulmonary disease and to pregnant women with complications, for a more citizen-centric treatment. “Telemedicine” refers to a supplement to standard treatment of chronic patients. It includes technological solutions meant to engage citizens in the

management of their own health and to promote their active participation in the prevention, treatment, and rehabilitation of their health. Examples include easy access to training and educational materials on web portals and training apps for smartphones.¹

The commitment makes innovative use of technology in the health sector. It also provides citizens with increased access to personal health data through the application of telemedicine applications in their homes. Thus, the commitment also contributes to the access to information value.

The commitment is not fully verifiable, as there are no start dates for the first two milestones. Furthermore, the commitment, as described in the action plan, is unclear regarding the technological element of the telemedicine solution being provided. Moreover, the website listed in the action plan—<https://www.digst.dk/Digital-velfaerd>— is not working.

The IRM researcher considers the potential impact of the initiative to be minor. The initiative could provide citizens with an innovative way to approach their health care treatment through the use of telemedicine. It may also strengthen their access to information. However, it does not substantially improve citizen engagement on open government and has limited verifiability as written.

Next steps

- If the commitment is carried over to the next action plan, the overview of the commitment could be further specified, particularly regarding the technological elements of telemedicine. Furthermore, the milestones should be specified.
- The IRM researcher also recommends that further analysis be carried out to determine whether patients and health care providers are fully supportive of and comfortable with this new form of technology.

¹ “Telemedicin og Telesundhed,” The Danish Health Data Authority, <https://sundhedsdatastyrelsen.dk/da/rammer-og-retningslinjer/telemedicin-og-telesundhed>.

Commitment 8: My Log

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

In the annual budget agreement between the government and the regional governments for 2018 it was agreed that data and information security-work should be of high priority and should be strengthened further to ensure confidentiality (and thereby security) of personal sensitive information and a high level of security in the digital infrastructure. This includes ensuring increased transparency of access to the citizens' health data.

On that basis it was agreed that the regional governments in the future adjustments of the hospital information systems would be obligated to make sure that it is possible for the citizens to review digital log-information, even when data is processed/accessed through internal systems in hospitals. In addition, it was agreed to analyse how a user-friendly joint public solution could be made accessible for citizens via the webpage Sundhed.dk. One of the purposes of Sundhed.dk is to gather all health-related information in one place, where patients can access information about e.g. health record, health related treatments on hospitals, lab results, vaccinations and prescriptions. In addition to access to own health data, sundhed.dk contains information about health services, hospitals, health-apps, diseases, etc.

Danish Regions is responsible for the analysis, and the analysis itself is expected to be carried out in collaboration with the Danish Health Data Authority. Content, time and the organisation of the analysis will be completed by the end of 2017.

Milestones:

- 8.1 Presentation and clarification of analysis
- 8.2 Execution of analysis

Start Date: September 2017

End Date: November 2018

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 19–21.

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

Context and objectives

Regional governments in Denmark have invested in digital solutions for health care systems over the past decade. By law, all access to health data must be logged, and some of these logs are visible for citizens in a shared registry solution called Min Log (My Log). Through My Log, citizens can see which people at hospitals have handled their electronic patient journal. My Log also makes it feasible to report illegal data use.

Public debate around the balance between digitisation and access to sensitive information continues.¹ The 2018 annual budget between the national government and regional governments emphasised data and information security work as priorities to ensure the confidentiality of personal information. The budget also called for the government to analyse how to make a user-friendly joint public solution available to citizens through the public health page sundhed.dk. (Sundhed.dk gathers all health-related information on one page.) The process began in May 2016, and it is expected to be implemented across all regions by 2020.²

This commitment's solution would allow citizens to know which health care professionals have accessed their electronic charts. Thus, it would provide transparency and give citizens increased access to their files, promoting trust in the overall health system.

This initiative is intended to promote transparency and open government. The relevance of this commitment to the OGP values is mainly related to access to information, given its goal of allowing citizens to access their own health data. As a data initiative, the commitment also relates to the technology and innovation for transparency and accountability value. While the commitment seeks to bolster citizen access to information, it does not describe a mechanism to hold authorities accountable through My Log. Therefore, it does not directly support public accountability. However, it does indirectly promote public accountability, as it provides a way for citizens to monitor authorities' use of their health information.

This commitment is, as written, not specific enough to enable verification of its implementation. The text refers to a "study," and the milestones refer to "analysis"—neither of which are clearly defined. The IRM researcher considers the potential impact of this commitment, as described by the milestones, to be minor because it deals with analysis that is not sufficiently explained. Introduction of a log system for citizens to track access to their health files could potentially be transformative. However, it would have to be presented in a clearer way in the next action plan to be considered as such.

The IRM researcher recommends that a future iteration of this commitment refer to implementation of the initiative across the Danish regions, measured by whether they can display log information.

Next steps

The IRM researcher proposes the following recommendations for this commitment:

- Carry the commitment forward to the next action plan, since it has not been implemented fully and reflects the social priority of access to health information at the regional level.
- Reformulate the commitment description and milestones in the next action plan to ensure verifiability, further specifying the various elements of the analysis.
- Building on extensive engagement across Danish regions, share lessons learned at the next multi-stakeholder forum to allow future action plan commitments to be locally anchored.

¹ Jakob Sorgenfri Kjær, "Danmark Får en Hær af It-Eksperter, der Skal Beskytte dit Privatliv," *Politiken*, 13 June 2017, <https://politiken.dk/indland/art5992124/Danmark-f%C3%A5r-en-h%C3%A6r-af-it-eksperter-der-skal-beskytte-dit-privatliv>.

² Kristoffer Kjærgaard Christensen and Nanna Skovgaard (Ministry of Health), interview by IRM researcher, 29 October 2018.

Theme III: Working together for a better public sector

Commitment 9: National strategy for a stronger civil society

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

“The commitment will be implemented based on input from a task force consisting of central players from civil society, local governments, the business community and trade unions. The recommendations of the task force, which were submitted to the Government on 14 September 2017, will form part of the work on the strategy for a stronger civil society. The task force’s mandate contained five tracks:

Track 1: The value of volunteering. This track aims to investigate the social value of volunteering in relation to the public initiatives in one or more projects, e.g. on the basis of a social issue and through partnerships with for example local governments and foundations. In addition, organisational and collaboration models can be developed for collaborate on solving welfare challenges, particularly targeting citizens on the fringe of society.

Track 2: Participation and community. This track will contain specific initiatives to underpin the Government’s objective of making more citizens outside the working community and with no education volunteer.

Track 3: Economy. This track can involve a study of how to ensure a more targeted use of funds in the sector, including removing barriers to the current economic support structure for voluntary social work and support acquiring knowledge and gathering evidence about the effects of volunteering.

Track 4: Infrastructure This track can include initiatives that aim to improve the infrastructure in the voluntary sector, including e.g. supporting volunteering locally and civil society’s representation in relation to national political representation and locally in the local governments.

Track 5: Research and knowledge It is proposed to earmark funds for strengthening the knowledge base about and inside civil society. Focus can be on civil society’s own needs for knowledge about its own initiatives by facilitating evaluation models that are easy to implement or other methods for showing the change brought about by volunteering.”

Milestones:

- 9.1 Recommendations from the task force have been submitted to the Danish Government
- 9.2 Civil society strategy published
- 9.3 Implementation
- 9.4 First initiative formed

Start Date: 1 July 2017

End Date: 31 December 2021

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 22–23.

Commitment Overview	Verifiability	OGP Value Relevance (as written)	Potential Impact	Completion	Did It Open Government?
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	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
9. Overall		✓		✓					✓		Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

The government presented the civil society strategy on 9 October 2017. The strategy focused on reducing the feeling of loneliness among citizens, supportive infrastructure and knowledge exchange, and following recommendations of the Task Force on a Stronger Civil Society in September 2017. The task force consisted of representatives from civil society (e.g., volunteers, mothers, relatives of suicide victims, child care workers, youth), Local Government Denmark, the Confederation of Danish Industry, the Danish Red Cross, and Save the Children.¹

The civil society strategy seeks to underpin the government’s broader reform, which started in 2017 and is being rolled out during the fall of 2018.² This reform aims to create better collaboration between the public sector and civil society.³ It will work toward four main themes: (a) more time for core work, (b) better welfare across sectors, (c) a timely public sector, and (d) better leadership.⁴

This commitment seeks to address the lack of citizen participation in local communities, for example through volunteering. In its civil society strategy, the government expects more citizens to volunteer and take responsibility for their communities. Local voluntary social work was also expected to be upgraded through sustainable local volunteering communities.

The civil society strategy is relevant to the OGP value of civic participation, as the strategy aims to improve civil society’s ability to engage in local public life. The government expects citizens to have a higher degree of influence over decisions that affect their lives, particularly locally.

In terms of verifiability, the first two milestones of this initiative are clear and verifiable. (E.g., recommendations from the task force are submitted; the civil society strategy is published). The milestone on implementation is broad, however, and the milestone “First initiative formed” could be further specified.

The IRM researcher considers the potential impact of the commitment to be moderate. The initiative constitutes a major civil society strategy and an effort to improve civic participation in local and regional decision-making structures. While civil society representatives have welcomed the strategy, it does not necessarily indicate a transformative change in the behaviour between civil society and the state moving forward.

Next steps

The IRM researcher proposes the following recommendations for this commitment:

- This commitment could be carried forward into the next action plan, to gauge and build on the results achieved so far.
- The design of the commitment could be improved by increasing the specificity of the five strands of activity (and their sub-activities), while keeping the text short.
- The commitment could clearly spell out the meaning of key terms, such as “research” and “economy.”
- Civil society representatives could be brought in to participate in the OGP discussions at the multi-stakeholder forum, as an example of civic engagement at the decentralised level. In line with other recommendations in this report, the voice of Local Government Denmark could be strengthened.

¹ “Task Forcen for et Stærkere Civilsamfund Afleverer sine Anbefalinger,” Ministry of Finance and Ministry for Children and Social Affairs, 14 September 2017, <https://www.regeringen.dk/nyheder/task-forcen-for-et-staerkere-civilsamfund-afleverer-sine-anbefalinger>.

² “Regeringen vil Fjerne Bøvl Og Bureaukrati For 4 Milliarder Kr,” Ministry of Finance, 4 September 2018, <https://www.fm.dk/nyheder/pressemeddelelser/2018/09/regeringen-vil-fjerne-boevl-og-bureaukrati-for-4-milliarder-kr>.

³ “Sammenhængsreform,” the Danish Government, 4 April 2017, <https://www.regeringen.dk/nyheder/sammenhaengsreform/>.

⁴ Ibid.

Commitment 10: Report a rule

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

“The commitment will be carried out as part of a campaign from October 2017 to February 2018 where the websites of the ministries that manage citizen- and business-oriented rules will be equipped with digital mailboxes through which citizens, businesses, trade unions, etc. can submit proposals for debureaucratising of the public sector. The ministries will screen the proposals and assess whether they should lead to amendments of legislation, orders, rules and procedures, etc. Proposals can also form part of the Government’s cohesion reform. The overall objective of this commitment is to ensure the inclusion of citizens, businesses, trade unions, etc. in the Government’s effort to create a more efficient public sector.”

Milestones:

- 10.1 Campaign launch
- 10.2 First follow-up on campaign
- 10.3 Final follow-up on campaign

Start Date: October 2017

End Date: February 2018

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 24–25.

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
10. Overall	✓			✓		✓		✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

The overall objective of this commitment is to include citizens, businesses, trade unions, and others in the government’s effort to create a more efficient public sector, also known as a “debureaucratising” effort.¹ The initiative is—like Commitment 9 on the civil society strategy—part of the government reform through which rules will be simplified for a more coherent public service.

The proposed solution involves establishing online mailboxes for those ministries that manage citizen- and business-oriented rules. This will allow all actors to submit ideas for rules. These ideas will be screened by ministries for relevance.

The aim to debureaucratise the public sector in Denmark has been discussed for several decades. The present government has made it a political priority to pursue effectivisation. The Confederation of Danish Industry supports this goal, as have some labour unions (such as the The Danish Association of Lawyers and Economists, DJØF, representing political scientists, economists, lawyers, and others). However, their support comes with various caveats. (For example, the Confederation of Danish Industry has called for an emphasis on digitisation; DJØF wishes to limit excessive firings.)²

The commitment is aligned with the OGP value of civic participation. Citizens are encouraged to submit ideas for debureaucrating the public sector. The government expects the initiative to allow citizens to influence government decisions and initiatives. The commitment also uses technology and innovation for transparency and accountability by placing the mailboxes online.

In terms of verifiability, the ministry websites can be monitored to assess whether digital mailboxes exist. However, Milestones 10.2 and 10.3 are not specific, as more could be said about the details of campaign follow-up. Furthermore, the feasibility considerations for the proposals are not detailed in the description of the commitment as written.

The commitment is expected to change government practices. It will allow for a continuous dialogue among civil society, businesses, and authorities about which rules stand in the way of having an effective relationship with the public sector. The IRM researcher has deemed the potential impact as minor, given the low specificity of the commitment text and milestones.

Next steps

- Ensure transparency in the publication of the proposals and how they are considered by the ministries.
- Since the initiative has already concluded, with extensive feedback received from civil society representatives, the IRM researcher recommends that it not be carried forward in future action plans, to make space for new ideas.
- It is suggested, however, that those responsible for the commitment attend the next multi-stakeholder forum to share lessons learned, particularly on how they were able to attain such a high level of civil society feedback.

¹ “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 24–25.

² Christian Hannibal, “Karsten Dybvad: Tænk Digitalisering ind i Reform af den Offentlige Sektor,” Dansk Industri, <https://di.dk/dibusiness/nyheder/pages/karsten-dybvad-taenk-digitalisering-ind-i-reform-af-den-offentlige-sektor.aspx?printType=3>; and “Djøf Støtter Helhjertet Afbureaukratisering,” DJØF, 4 April 2018, <https://www.djoef.dk/presse/pressemeddelelser/2018/dj-oe-f-st-oe-tter-helhjertet-afbureaukratisering.aspx>.

Commitment 11: Open Government Partnership Forum / OGP Forum

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

“As part of the implementation of the action plan, a forum will be established consisting of stakeholders from civil society and possibly ministries and/or local governments. The forum will be entrusted with the task of contributing regularly with input to Denmark’s participation in OGP at a strategic level as well as in relation to the development and evaluation of the Open Government action plans.”

Milestones:

- 11.1 Identification of potential members
- 11.2 Dialogue with potential members
- 11.3 Establishment of forum
- 11.4 Start-up meeting

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, p. 25.

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
11. Overall		✓	✓				✓				Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment seeks to strengthen dialogue between the government and civil society on Denmark’s involvement in OGP. The commitment will create a multi-stakeholder forum to serve as a platform for open network meetings. The forum would involve both the state and members of civil society to discuss Denmark’s involvement in OGP. The inclusion of this commitment in Denmark’s 2017–2019 action plan follows up on a previous IRM recommendation to promote regular stakeholder meetings to assure stakeholder ownership of OGP values and challenges.¹

In terms of relevance to OGP values, the commitment aims to strengthen civic participation by providing a regular forum for citizen views on government initiatives.

As written, the milestones related to the creation of the multi-stakeholder forum and the inclusion of civil society can be verified. However, the commitment text could further specify how potential members will be identified and the rules for participating.

While civil society representatives have welcomed the establishment of the forum, they expressed concern that the dialogue primarily involves coordination rather than issues of high political relevance, such as the freedom of information act.²

The IRM researcher deems the potential impact to be minor. The forum largely provides a formalisation and regularisation of engagement with civil society—one that is expected by OGP—rather than significant change. Furthermore, in this forum, civil society representatives are expected to provide input on the OGP process, rather than contribute to setting or changing its agenda. Thus, the scope of the change from their involvement is limited.

Next steps

- This commitment has concluded with the launch of the first multi-stakeholder forum on 22 August 2018. Therefore, it does not need to be carried forward in the next action plan.
- However, the IRM researcher recommends that future forums include discussion on the role and relevance of the forum and its ambition (e.g., high-policy versus low-policy issues).
- While the IRM calls for the forum to be held at least every quarter (see Annex I), minutes from the first forum indicate that participants wish to meet only around concrete activities (e.g., action plans and evaluations).³ The IRM researcher suggests that the Agency for Digitisation clarify on its website how often it expects the forum to meet moving forward, within the local Danish context.

¹ Mads Kæmsgaard Eberholst, “Independent Reporting Mechanism (IRM) Progress Report 2014–2015: Denmark,” Independent Reporting Mechanism, https://en.digst.dk/media/17717/26-denmark_irm-progress-report-2014-15_final_eng.pdf, p. 51.

² Niels Erik Kaaber Rasmussen (Open Knowledge Denmark), interview by IRM researcher, 1 November 2018.

³ “Notat,” Danish Agency for Digitisation, 23 August 2018, <https://digst.dk/media/17855/34-referat-fra-ogp-netvaerksmoede-d-22-august.pdf>.

Theme IV: A global effort for openness

Commitment 12: Anti-corruption and transparency in Denmark’s country programme for Uganda

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

“Denmark will through the Country Programme – in close coordination with other development partners – support key democratic state and non-state stakeholders and the partnerships between them, and thereby promote a more accountable, inclusive and stable society including engagements in:

- Democratic Governance Facility (DGF)
- Financial Management and Accountability Programme (FINMAP)
- Inspectorate of Government (IG)
- Anti-corruption control mechanisms in the country programme.”

Milestones:

12.1 Continuous updates on the commitment can be found at www.openaid.dk

12.2 Mid-term review

Start Date: 2018

End Date: 2022

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 26–28.

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
12. Overall	✓		Unclear				✓				Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

Uganda is one of Denmark’s 12 priority countries under Denmark’s current development policy. The Danish government seeks to help stabilise Uganda’s political and economic environments by bringing Danish good governance interventions to curb corruption challenges in Uganda. Denmark also seeks to promote Danish business collaboration in Uganda.¹ This commitment also aims to address corruption in Uganda by promoting political

inclusion. Specifically, the commitment will bring together democratic state institutions and civil society to promote legal security, transparency, democracy, and respect for human rights.

The commitment proposes to support democratic stakeholders in and outside the state through Denmark's country programme. The programme promotes inclusive engagement in the Democratic Governance Facility (DGF), the Financial Management and Accountability Programme (FINMAP), and the Inspectorate of Government (IG). The DGF emphasises strengthened democratic processes, greater legal security, human rights, and citizen inclusion. IG monitoring will allow stakeholders to pursue stronger good governance, accountability, and legal security in public office. Finally, the FINMAP programme is the basis for implementation of Uganda's management of public finances (PFM) reform strategy. Denmark's support for PFM is expected to bolster effective use of public resources. Such effective use will be promoted through an introduction to the Danish International Development Agency's anti-corruption policy, registration and reporting, and a workshop and online courses. The Danish embassy in Kampala will be in charge of, among other activities, the anti-corruption workshop and anti-corruption online training courses.

The commitment aims to promote open government in Uganda, particularly access to information (e.g., creation of a budget website) and public accountability (e.g., establishment of an anti-corruption help line). However, it is unclear how the commitment is relevant to OGP values in Denmark, since it will be implemented in another country. The initiative's milestones are unspecific ("continuous updates on the commitment can be found at www.openaid.dk") and refer to an unspecified midterm review. Moreover, the description of the commitment in the action plan is somewhat vague—e.g., the phrasing "support key democratic state and non-state stakeholders and the partnerships between them." The section on how the commitment will contribute to solving the public problem has useful detail. However, the section is long; the commitment text could be edited.

The IRM has classified the potential impact of this commitment, as written, as "none." The milestones lack verifiability, and the initiative continues a long history of Danish anti-corruption work in Uganda. The proposed activities planned for this commitment would not change the Danish government's existing work in this area. FINMAP was established in 2006, and Danish support for the programme began in 2013.² Nevertheless, the initiative may continue contributing to anti-corruption efforts in Uganda: according to the Ministry of Foreign Affairs, the commitment was recognised during the 2018 International Anti-Corruption Conference in Copenhagen as a constructive use of a national action plan to further OGP's values.³

Next steps

The IRM researcher recommends the following steps be taken for this commitment:

- The initiative could be strengthened by training Danish companies operating in Uganda on principles of open government.
- The commitment text could be further specified, primarily through more details in the milestones.
- Overall, however, the IRM researcher recommends that the next action plan focus on domestic reform efforts rather than international initiatives and therefore that this commitment not be carried forward.

¹ "Country Policy Paper for Uganda 2018–2022," Danish Ministry of Foreign Affairs, <http://uganda.um.dk/en/danida-en/country-policy-paper-for-uganda-2018-2022/>.

² "Meeting in the Council for Development Policy," Ministry of Foreign Affairs, 26 October 2017, <http://um.dk/~media/UM/English-site/Documents/Danida/About->

[Danida/Danida%20transparency/Documents/Council%20for%20development%20policy/2017/04%20Uganda.pdf?la=en.](#)

³ Adwan Mohamad (Ministry of Foreign Affairs), interview by IRM researcher, 30 October 2018.

Commitment 13: The 18th International Anti-Corruption Conference

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

“In 2018, Denmark will host the 18th International Anti-Corruption Conference, organised in close cooperation with Transparency International. As part of the conference a high-level segment will be organised with ministry-level members from around 20 donor countries and developing countries. The objective of the high-level segment is to strengthen common efforts and facilitate concrete anticorruption initiatives with operational follow-up mechanisms, including initiatives within the area of public-sector transparency.”

Milestones:

13.1 Specific initiatives to combat corruption from 15-20 countries.

Start Date: 25 September 2017

End Date: 22 October 2018

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 28–29.

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
13. Overall		✓	Unclear					✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment sought to organise a high-level segment at the 18th International Anti-Corruption Conference in Copenhagen (IACC) (October 2018) to facilitate worldwide anti-corruption initiatives. The commitment addresses corruption and its effects on democratic and economic development. Such effects include the overall political process, democratic rights, public service quality, procurement, taxes, the business environment, law and order, and potentially radicalisation and civil war. A global forum established in 1983, the IACC brings together heads of state, civil society, the private sector, and others to tackle corruption challenges. The conference usually takes place every two years in different regions of the world.¹ The IACC was co-organised by Transparency International, a representative of civil society that acts as secretariat to the IACC Council.

This commitment proposed a high-level segment of the IACC in which leaders will create a set of initiatives to combat corruption in a variety of countries. A follow-up high-level segment is expected for the next IACC, to be held in the Republic of Korea in 2020. That session would sum up the implementation of initiatives announced in 2018. Civil society is expected to play a key role in the oversight of this implementation. The commitment does not describe in detail, however, how this oversight will take place.

The commitment intends to promote access to information and access to knowledge (on topics such as business ownership and transparency on tax advice). Thus, it will enable civil society organisations to be watchdogs over public institutions, and it will bolster public accountability. In addition, civil society is expected to be consulted on implementation of the initiatives, thereby strengthening civic participation. Overall, while the topics explored at the IACC are relevant to open government, this commitment is not directly relevant to OGP values because the IACC conference is organised as a regularly occurring event.

The commitment is verifiable. The IACC was a tangible conference with specific dates. The declaration from the high-level segment and its country initiatives can be found online.² However, the commitment's objectives are somewhat vague (e.g., "to strengthen common efforts"), as is its milestone on "specific initiatives."

This commitment could potentially have a transformative anti-corruption impact, given the variety of OGP values that could be addressed by several countries. However, due to the relative lack of specificity regarding implementation mechanisms, and the regularly occurring nature of the IACC, the IRM researcher has categorised its potential impact as minor. Ultimately, the commitment's success will depend on governments' willingness to pursue implementation and the space available for civil society to keep them accountable. Those factors will be analysed in the IRM implementation report.

Next steps

The IRM researcher recommends the following:

- Use the International Anti-Corruption Conference (IACC) statement as the basis for a follow-up commitment in the next action plan, to track implementation.
- Build on Denmark's national statement from the IACC and draft a commitment around its promise to play a more active role in preventing money laundering through the Financial Action Task Force.
- Invite the Ministry of Foreign Affairs to share lessons learned from the IACC at the next multi-stakeholder forum and tips on designing an OGP action plan commitment with an international scope.

¹ "About the IACC Series," International Anti-Corruption Conference, <https://iaccseries.org/about>.

² "The Copenhagen Declaration for Peace, Security, and Development," Corruption Watch, 26 October 2018, <https://www.corruptionwatch.org.za/the-copenhagen-declaration-for-peace-security-and-development/>.

Commitment 14: IATI (International Aid Transparency Initiative)

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

“The Ministry of Foreign Affairs of Denmark will increase transparency by increasing public possibilities of ‘tracing’ how Danish development cooperation funds are used: The Ministry of Foreign Affairs of Denmark will upgrade its own IATI reporting and align future procedures to ensure digital cohesion between the reporting from the ministry and the reporting from grant recipients. As this involves Open Data, the information will be directly available in machine readable format without requiring any action from a central source. In future, organisations receiving grants from the Ministry of Foreign Affairs of Denmark will be required to report their activities in accordance with the IATI standard (format) and carry on the requirement to their partners.”

Milestones:

14.1 All major Danish civil society organisations receiving grants from the Ministry of Foreign Affairs of Denmark will start reporting in the IATI standard format

14.2 All other Danish civil society organisations receiving grants from the Ministry of Foreign Affairs of Denmark will start reporting in the IATI standard format

14.3 International organisations receiving grants from the Ministry of Foreign Affairs of Denmark will start reporting in the IATI standard format

14.4 The Ministry of Foreign Affairs of Denmark will start reporting multiple country codes in DAC-CRS format based on IATI reporting from Danish civil society organisations

Start Date: 2017

End Date: 2019

Editorial note: For the full text of this commitment, see “The Danish OGP National Action Plan 2017–2019,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/open-government-partnership-ogp-action-plan/>, pp. 30–31.

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
14. Overall		✓	✓			✓		✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

The commitment aims to address the government's perception that the public has difficulty understanding the results of development cooperation. According to an opinion poll administered by the Danish news outlet Altinget, Danes are split in their views of development aid efficiency—with 45 percent in favour and 44 percent against.¹ (Danish People's Aid also posted the survey on its website.)

This commitment also seeks to upgrade International Aid Transparency Initiative (IATI) reporting. It would also improve digital cohesion between the Ministry of Foreign Affairs (MFA) and its grant recipients. Through detailed data retrieval, the MFA expects to be able to present a more precise statistical image of Denmark's role in international development cooperation.

The commitment is relevant to the OGP value of access to information. It potentially could provide citizens with more and better information on Danish development assistance. As this information is placed online, the commitment is also an example of technology being used for transparency and accountability.

The commitment's milestones are verifiable as written. It should be easy to determine whether a grant recipient reports through IATI. The commitment's description of the problem is not clear, however. It discusses complex cooperation and co-financing, rather than the problem regarding the lack of insight into development spending. The description of the commitment could also benefit from further detail on the background and function of the IATI system.

The IRM researcher expects this commitment to have a minor effect on the public's understanding of development spending. Most citizens will not likely know about IATI without a large-scale dissemination campaign. The IRM researcher therefore suggests that in future action plans, the MFA consider other commitments for raising the public's interest in and understanding of Danish financing of international development.

Next steps

The IRM research recommends the following for this commitment:

- International aid transparency has previously been a focus area in the Danish OGP context.² Thus, the IRM researcher recommends not carrying this initiative forward to future action plans.
- The IRM researcher urges the government to consider other commitments that could increase citizen participation in the formulation and financing of international development cooperation initiatives.

¹ "Danskerne Splittede om Effekten af Ulandsbistand," Dansk Folkehjælp, 24 May 2018, <https://www.folkehjaelp.dk/2018/05/24/danskerne-splittede-om-effekten-af-ulandsbistand/>.

² "Denmark Open Government Partnership National Action Plan 2012–2014," April 2012, Danish Agency for Digitisation, https://digst.dk/media/17707/12-denmark_ogp-actionplan_2012_eng-1.pdf, p. 18.

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

Specific recommendations for individual commitments are provided in Section IV, and the following are cross-cutting recommendations for Denmark's OGP process.

Expand participation in multi-stakeholder forum

To make the OGP process more participatory in Denmark, the IRM researcher recommends further strengthening the OGP multi-stakeholder process. Civil society representatives continue to express frustration that the Danish OGP process lacks attention from politicians. The IRM researcher therefore recommends inviting politicians from both national and local levels to participate in the multi-stakeholder forum so that they can hear directly from civil society and to ensure geographical balance. Moreover, the IRM researcher recommends that civil society representatives and other relevant actors, such as trade unions, be drawn into the forum process on single-issue topics of relevance to the commitments (e.g., day care). Finally, the IRM researcher recommends that the government further strengthen its intra-governmental coordination regarding OGP, ensuring there are clear focal points in each institution for a strong action plan.

Introduce whistleblower protection measures in the next action plan

The recent scandal regarding Danske Bank has highlighted the importance of robust whistleblower protection legislation. The OGP process could be used to bring together stakeholders to discuss possible mechanisms and good practices from other European Union and OGP member countries. More specifically, in the next action plan, the government could commit to preparing and tabling the relevant draft bill on whistleblower protection in Parliament.

Address the implementation of the General Data Protection Regulation

Implementation of the European Union's General Data Protection Regulation (GDPR), starting 25 May 2018, has been met with mixed reaction in Denmark. Some businesses and citizens have experienced confusion regarding what it is supposed to do. The GDPR directly affects transparency in some public institutions (e.g., the National Archives), as it can slow down the release of certain information. The next action plan could include a commitment that addresses implementation of the GDPR. It could do so, for example, through training courses on GDPR and its requirements. The next action plan could also follow up on how the directive is implemented across government agencies and whether it is restricting public access to government information.

Take measures to improve beneficial ownership transparency

Build on Denmark's experience as one among the first governments to adopt national legislation to implement the European Union's Fourth Anti-Money Laundering Directive. Follow up on the government's forward-looking statement at the International Anti-Corruption Conference. The next action plan could include a commitment to disclose beneficial owner information under the 2017 Act on Registration of Beneficial Owners.

Focus on further strengthening foreign aid transparency

The IRM researcher recommends that future action plans focus primarily on domestic reforms of relevance to OGP. In the 2017–2019 action plan, Commitment 12 focuses on

Uganda, and the 2013–2016 action plan contained a commitment (15) around Myanmar. Both of these commitments were bilateral in nature. Further, they may have pursued foreign aid objectives and had positive effects on open government in other countries. However, it is less clear what the direct benefits are for open government in Denmark. Instead of focusing on bilateral foreign aid projects, future Danish action plans could commit to improving transparency of the country’s foreign aid more broadly. This could involve a commitment to improve Denmark’s standing in Publish What You Fund (PWYF) Aid Transparency Index. The index listed Denmark’s Ministry of Foreign Affairs as “fair” in 2018. It finished behind Sweden, listed as “good.”¹ Denmark could also incorporate the PWYF’s recommendations for improving the transparency of its foreign aid. In particular, it could provide updated and consistent performance-related information and promote the use of aid data internally and externally.

Include tangible and measurable outcomes for commitments

The IRM researcher urges the government to include more commitments with concrete and measurable changes and outcomes (e.g., day-care information portals, more and better open data). The 2017–2019 action plan contains eight commitments on data, and several of these appear similar to one another (e.g., Commitments 4 and 5 on open data). It could therefore be helpful to the scope of future action plans if such initiatives were grouped together in a single commitment. Public engagement with the OGP process could also be facilitated by the inclusion of more tangible, single-issue topics, such as day care.

Improve public knowledge about OGP

Finally, the IRM researcher recommends broadening public knowledge about Denmark’s OGP process through social media outlets (such as the Agency for Digitisation’s Twitter and LinkedIn pages). Denmark could also conduct more targeted communication efforts to increase engagement regarding action plans, evaluations, and the multi-stakeholder forum.

Table 5.1: Five Key Recommendations

1	Expand participation in multi-stakeholder forum
2	Introduce whistleblower protection measures in the next action plan
3	Address the implementation of the General Data Protection Regulation
4	Take measures to improve beneficial ownership transparency
5	Focus on further strengthening foreign aid transparency

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	Increase the clarity of the action plans	×	✓
2	Place the political mandate of OGP in the prime minister’s office	×	×
3	Designate an OGP point of contact in each government institution	×	×
4	Promote regular stakeholder meetings	×	✓
5	Include more ambitious commitments relevant to country context issues	×	×

Of the five recommendations from the previous IRM report, two were clearly integrated into the third action plan. First, the clarity of the action plan was increased through the introduction of concrete timelines and milestones for every commitment. The new action plan also includes a description of each commitment's connection to OGP values. Second, the government has promoted regular stakeholder meetings by introducing the multi-stakeholder forum in 2018.

The recommendation to place the political mandate of the OGP in the prime minister's office has been discussed internally. However, the government decided to keep OGP in the Agency for Digitisation (AFD). The prime minister's office traditionally does not focus on single policy areas. The AFD, however, is considered a natural fit because of its emphasis on openness and data.²

The designation of an OGP point of contact happens in relation to specific OGP activities, such as the development of a new action plan. The Denmark OGP process is therefore less centralised.

Finally, the level of ambition of the commitments in the current action plan remains similar to that of previous plans. While some commitments relate to domestic policy priorities (e.g., day care), many focus on open data. The commitments' foci reflect the government's view that the OGP process in Denmark is not a forum for the discussion of high-policy issues.

¹ "The 2018 Aid Transparency Index," Publish What You Fund, <https://www.publishwhatyoufund.org/the-index/2018>.

² Andreas Meyer-Juhlin (Danish Agency for Digitisation), interview by IRM researcher, 9 October 2018.

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 Denmark's OGP repository¹ (or online tracker), 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 where 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

The IRM researcher conducted 18 interviews with representatives of government and civil society involved in or leading the implementation of the Danish OGP commitments for 2017–2019. Interviews were carried out in person or by phone, with occasional follow-up questions by email. The interviews involved discussion of the co-creation process of the national action plan and initial thoughts on the implementation of commitments, taking into consideration the recently published self-assessment report. Few challenges were encountered, as most stakeholders made themselves available. However, geographically, it was easier to meet those stakeholders in Copenhagen than those in Aarhus.

The IRM researcher conducted the following stakeholder interviews:

- Line Askgaard, Danish Agency for Digitisation, 2 November 2018
- Nikolaj Beuschel, Ministry for Children and Social Affairs, 9 November 2018
- Marina Buch Christensen, Transparency International, 28 October 2018
- Jakob Flentegård-Rod, Danish Agency for Digitisation, 2 November 2018
- Sally Berg Halmvig, Danish Agency for Digitisation, 2 November 2018
- Majbrit Holm Jakobsen, Ministry of Foreign Affairs, 30 October 2018
- Birgitte Kjærgaard, the Aarhus City Council, 30 October 2018
- Kristoffer Kjærgaard Christensen, Ministry of Health, 29 October 2018
- Anne Sofie Fink Kjeldgaard, Danish National Archives, 30 October 2018
- Cathrine Lippert, Danish Technological Institute, 19 October 2018
- Anna Louise Madsen, Danish Agency for Digitisation, 2 November 2018

- Andreas Meyer-Juhlin, Danish Agency for Digitisation, 9 October 2018 and 2 November 2018
- Adwan Mostafa Mohamad, Ministry of Foreign Affairs, 30 October 2018
- Niels Erik Kaaber Rasmussen, Open Knowledge Denmark, 1 November 2018
- Nanna Skovgaard, Ministry of Health, 29 October 2018
- Rune Møller Thomsen, Danish Agency for Digitisation, 2 November 2018
- Maria Berkowitz Wichmann, Ministry for Children and Social Affairs, 5 November 2018

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 comprised 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 “Document Repository,” Danish Agency for Digitisation, <https://en.digst.dk/policy-and-strategy/open-government/document-repository/>.

² “IRM Procedures Manual,” Independent Reporting Mechanism, <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

Annex I. Overview of Denmark’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	Yellow
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-government 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.	Green
2d. High-level government representation: The forum includes high-level representatives with decision making authority from government	Red
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	Green
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.	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).	Green

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