

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

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Table of Contents

Executive Summary: Finland	2
I. Introduction	4
II. Action Plan Implementation	5
1. Supporting everyone’s possibility to participate.	6
2. Taking care that there are clear descriptions of the reforms and services being prepared by the government.	8
3. Widening the access to information principle to public services that are incorporated.	10
4. Strengthening the skills and knowledge of access to information legislation in the public administration.	11
5. Publishing state procurement data to citizens	13
6. Making a clear and easy to understand description of the regional administration and clearly informing what changes due to the regional reform and why.	15
7. Organizing training to actors of the regional administration about open government principles and ways of working.	17
III. Multi-stakeholder Process	19
IV. Methodology and Sources	21
Annex I. Overview of Finland’s performance throughout action plan implementation	22
Annex II. IRM Indicators	24



Executive Summary: Finland

Finland improved implementation of commitments in the third action plan. Notable achievements include improving the accessibility of state procurement data and the development of open government principles for public sector reform, which could be replicated in other sectors. The commitment on expanding the access to information principle to cover public services produced by corporate entities was not completed, as its implementation required legislative changes.

The Open Government Partnership (OGP) is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. The Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Finland joined OGP in 2013. Since, Finland has implemented three action plans. This report evaluates the implementation of Finland's third action plan.

General overview of action plan

Finland completed five out of seven commitments in its third action plan. While this marks a major improvement compared to previous action plans, many activities in the third plan lacked specific and measurable indicators to accurately assess their impact on opening government. The Finnish government engaged civil society organizations (CSOs) in the implementation process to a limited degree but could increase the role of government-civil society partnerships in the implementation of subsequent action plans.

During the third action plan, Finland significantly improved the accessibility of public procurement data by creating a low-threshold online service that facilitates easier access to it. Finland also developed and applied open government principles in the context of a major public sector reform.

Table 1. At a glance

Participating since: 2013
 Action plan under review: 3
 Report type: Implementation
 Number of commitments: 7

Action plan development

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

Action plan design

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

Action plan implementation

Starred commitments: 0
 Completed commitments: 5 (71%)
 Commitments with Major DIOG*: 1 (14%)
 Commitments with Outstanding DIOG*: 0
 Level of public influence: Involve
 Acted contrary to OGP process: No

*DIOG: Did it Open Government?



Table 2. Noteworthy commitments

Commitment description	Status at the end of implementation cycle
<p>3. Widen access to information principle</p> <p>Extend the access to information principle to cover public services that are produced in a company format.</p>	<p>This commitment was not completed. The primary reason for the limited completion is that the commitment requires legislative change. In July 2019, the Finnish government committed to assessing whether the scope of application of the Act on the Openness of Government Activities should be broadened to cover legal entities owned or controlled by the public sector.</p>
<p>5. Publish state procurement data</p>	<p>Through this commitment, Finland significantly improved the transparency of public procurement data by creating a low-threshold online service that facilitates easier accessibility. As a result, individuals and organizations are now able to access government procurement information without having to submit access to information requests.</p>

Five Key IRM Recommendations

The IRM key recommendations are prepared in the IRM Design Report. They aim to inform the development of the next action plan and guide implementation of the current action plan. In Finland’s 2017-2019 Design Report, the IRM recommended the following:

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

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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.

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

This report covers the implementation of Finland's third action plan for 2017-2019.

As reported in the 2017-2019 IRM Design Report, Finland is a robust parliamentary democracy, ranking high in indices measuring political stability, access to information, press freedom, and control of corruption.¹ Finland's third action plan builds upon themes introduced in the first two action plans, but its commitments lacked information on specific actions to reach their intended goals as well as indicators to measure their results. The action plan included commitments on the use of clear and plain language in government administration (Commitment 2), facilitation of civic engagement (Commitments 1, 6, and 7), and improved access to information (Commitments 3, 4, and 5).

Two out of seven commitments (Commitments 6 and 7) related directly to a wholesale administrative reform (Regional Government, Health and Social Services Reform), which failed to pass during the implementation period. The final stages of the government's preparation for this reform in spring 2019 were surrounded by political controversy, which prompted a response from the Finnish Chancellor of Justice criticizing the sometimes-unclear relationship between political decision making and civil service preparation.² According to the interviews conducted for this report, however, the preparatory work of the Regional Reform was generally perceived in positive terms.

¹ Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019,

https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf

² Oikeuskanslerinvirasto. Tuomas Pöysti: Lainvalmistelun ja sen johtamisen kehittämistarpeista valtioneuvostossa, 20.5.2019, <https://www.okv.fi/fi/tiedotteet-ja-puheenvuorot/509/tuomas-poysti-lainvalmistelun-ja-sen-johtamisen-kehittamistarpeista-valtioneuvostossa/>.

II. Action Plan Implementation

The IRM Implementation Report assesses “Completion” and “Did it Open Government?”. These two indicators are based on each of the commitment’s implementation progress at the end of the action plan cycle. This report does not re-visit assessments for “Verifiability”, “Relevance” or “Potential Impact”. The former are indicators assessed in IRM Design Reports. For more details on each of the indicators please see Annex II in this report.

2.1 Overview

According to the 2017-2019 IRM Design Report, the commitments in Finland’s third action plan were mostly vague and lacked specific milestones and measures.¹ Despite this, Finland carried out several concrete measures to increase government openness in the commitment areas. Five out of seven commitments were completed during the implementation period, with one commitment having limited completion status (Commitment 3). This marks a clear improvement to Finland’s 2015-2017 action plan, in which none of the commitments were fully complete.² The primary reason behind this improvement is that Finland’s third action plan was more concrete compared to its predecessor. However, as reported in the 2017-2019 IRM Design Report, Finland’s third action plan would have benefitted from further inclusion of specific measures to reach its stated objectives. This lack of specific measures and milestones has been at least partly addressed in Finland’s fourth action plan.³

Commitment 5 achieved major changes in government practice in the area of access to information. The Finnish government created an online portal to facilitate low-threshold access to government procurement data. As a result, individuals and organizations are now able to access government procurement information without having to submit access to information requests. According to the stakeholder input gathered for this report, the implementation period of Finland’s third action plan also saw clear improvement in the accessibility of government-provided information.

¹ Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf

² Independent Reporting Mechanism (IRM): Finland End-of-Term Report 2015–2017, https://www.opengovpartnership.org/wp-content/uploads/2019/01/Finland_EOT_Report_2015-2017_EN.pdf

³ Open Government IV Action Plan (2019-2023): Finland, https://www.opengovpartnership.org/wp-content/uploads/2019/09/Finland_Action-Plan_2019-2023_EN.pdf

2.2. Commitments

I. Supporting everyone's possibility to participate.

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

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

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

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

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

Start Date: Not identified

End Date: Not identified

IRM Design Report Assessment	IRM Implementation Report Assessment
<ul style="list-style-type: none"> • Verifiable: No • Relevant: Civic participation • Potential impact: Minor 	<ul style="list-style-type: none"> • Completion: Complete • Did it Open Government? Marginal

This commitment sought to improve citizen participation in public administration planning, with special attention paid to persons in vulnerable positions, such as children and other special needs groups.² To do so, this commitment aimed to make participation opportunities more diverse, easily discoverable, accessible, and understandable. The concrete mechanisms to reach this aim included the promotion of an existing online consultation platform (lausuntopalvelu.fi, launched in 2014), as well as other digital channels and services, events, and workshops.³ The online consultation platform offers individuals and organizations the possibility to comment on legislation and public sector preparatory work.

As part of this commitment, the Finnish government organized events (e.g. Universal Children's Day, an immigrant workshop, and an elder council day) and promoted the use of the consultation platform within the government and municipalities.⁴ Because the commitment does not include other specific measures to reach its stated objectives, its implementation is considered complete.

During the implementation period, the Finnish government provided selected stakeholder groups opportunities to engage with public sector decision making and preparatory work. One of the stated objectives of the government during the implementation period was to develop the Universal Children's Day.⁵ To mark the 30th anniversary of the UN Convention on the Rights of the Child in November 2019, the government arranged an event during which 100 children from different parts of Finland took over the Government Palace for three hours and drafted a children's declaration with the help of civil servants.⁶

The emphasis on individual events for professional and special-interest groups meant that the commitment had a limited outreach.⁷ The government's willingness to increase co-operation between youth and elder councils is a positive⁸ and concrete development, but its application remains limited in scope. This co-operation model is based on a three-day event held in the

municipality of Hollola in May 2018.⁹ The use of the online consultation platform has increased openness, but the government could ensure that all citizens and CSOs have engagement possibilities in the early stages of public sector decision making, instead of simply having an opportunity to comment on decisions that have already been made.¹⁰

Overall, the implementation of this commitment resulted in marginal changes to government practice.

¹ Open Government III Action Plan (2017-2019): Finland, https://www.opengovpartnership.org/wp-content/uploads/2017/05/Finland_NAP_2017-2019_EN.pdf

² Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf

³ Avoin ja yhdenvertainen osallistuminen: Valtioneuvoston demokraatiopoliittinen selonteko 2014, VNS 3/2014 vp, https://www.eduskunta.fi/FI/vaski/selonteko/Documents/vns_3+2014.pdf

⁴ Avoimen hallinnon III toimintaohjelman toimeenpano: Tuetaan kaikkien mahdollisuutta osallistua, Ministry of Finance, <https://avoinhallinto.fi/toimeenpano/tuetaan-kaikkien-mahdollisuutta-osallistua/>

⁵ Avoimen hallinnon III toimintaohjelman toimeenpano: Tuetaan kaikkien mahdollisuutta osallistua, Ministry of Finance, <https://avoinhallinto.fi/toimeenpano/tuetaan-kaikkien-mahdollisuutta-osallistua/>

⁶ Lapsen oikeudet 30 vuotta: Lapset valtaavat valtioneuvoston ja osallistuvat päätöksentekoon 20.11., Government Communications Department, https://valtioneuvosto.fi/artikkeli/-/asset_publisher/10616/lapset-valtaavat-valtioneuvoston-ja-osallistuvat-paatoksentekoon-20-11-

⁷ Elina Pekkarinen, Ombudsman for Children, and Terhi Tuukkanen, Senior Researcher, Office of the Ombudsman for Children, 16 October 2019.

⁸ The Union of Local Youth Councils in Finland, 30 October 2019.

⁹ Hyvä fiilis -tapahtuma 18.5.-20.5.2018, <https://www.hollola.fi/hyva-fiilis-tapahtuma-185-205>

¹⁰ The Union of Local Youth Councils in Finland, 30 October 2019. Paula Karppinen, Regional Development Manager, 8 November 2019.

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

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

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

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

Start Date: Not identified

End Date: Not identified

IRM Design Report Assessment	IRM Implementation Report Assessment
<ul style="list-style-type: none"> • Verifiable: No • Relevant: Access to information • Potential impact: Minor 	<ul style="list-style-type: none"> • Completion: Complete • Did it Open Government? Marginal

This commitment aimed to make information on government services and preparatory work more accessible through increased attention to clear and plain language, and multichannel distribution. According to a study by the Finnish Centre for Easy Language (2019), 11-14 percent of Finns need plain language in order to deal with authorities.² This figure includes immigrants and language learners, elderly citizens and memory loss patients, persons with disabilities, and persons who are socially marginalized.³

During the implementation period, the Finnish government created and promoted training tools and e-learning possibilities for civil servants to improve the accessibility of government information, along with a government website with information on web content accessibility.⁴ By November 2019, 856 individuals had completed an e-learning course on clear government language and the government website on web content accessibility had attracted more than 15,000 unique users.⁵ Therefore, this commitment is considered complete, although the commitment text lacked specific indicators to measure implementation.

Despite the vague wording of the commitment, the Finnish government carried out concrete measures to improve the accessibility of government information. According to the Development Director of the Finnish Centre for Easy Language, government practice in this policy area has improved during the implementation period.⁶ In particular, the publication of a plain language website for the government branch that administers and provides social security benefits for all residents of Finland (Kela) marks a significant improvement.⁷ However, according to the interviewee, the use of plain language is still inadequate to meet the requirements of the persons who need it, as long as these persons are not able to obtain information on decisions directly impacting them in plain language (e.g. outcomes of benefit applications).⁸ While the Finnish government has provided more tools for civil servants to improve the accessibility of government-provided information, improvements depend upon the proactivity of individual government agencies.⁹

By implementing this commitment, the Finnish government improved the quality of government-provided information, its accessibility, and the channels to disclose it. The implementation of this commitment marks a marginal but notable step forward in government openness.

¹ Open Government III Action Plan (2017-2019): Finland, https://www.opengovpartnership.org/wp-content/uploads/2017/05/Finland_NAP_2017-2019_EN.pdf

² Markku Juusola, "Selkokielen tarvearvio 2019", Finnish Centre for Easy Language, The Finnish Association on Intellectual and Developmental Disabilities (FAIDD), 2019, <https://selkokeskus.fi/wp-content/uploads/2019/02/Tarvearvio-2019.pdf>

³ Markku Juusola, "Selkokielen tarvearvio 2019", Finnish Centre for Easy Language, The Finnish Association on Intellectual and Developmental Disabilities (FAIDD), 2019, <https://selkokeskus.fi/wp-content/uploads/2019/02/Tarvearvio-2019.pdf>

⁴ Avoimen hallinnon III toimintaohjelman toimeenpano: Huolehditaan siitä, että hallinnon valmistelemista uudistuksista ja palveluista on saatava selkeä ja ymmärrettävä kuvaus, Ministry of Finance, <https://avoinhallinto.fi/toimeenpano/huolehditaan-siita-etta-hallinnon-valmistelemista-uudistuksista-ja-palveluista-on-saatava-selkea-ja-ymmarrettava-kuvaus/>

⁵ Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland), 6 February 2019.

⁶ Leealaura Leskelä, Development Manager, Finnish Centre for Easy Language, 22 October 2019.

⁷ Kela, <https://www.kela.fi/web/selkosuomi>; Leealaura Leskelä, Development Manager, Finnish Centre for Easy Language, 22 October 2019.

⁸ Leealaura Leskelä, Development Manager, Finnish Centre for Easy Language, 22 October 2019.

⁹ Leealaura Leskelä, Development Manager, Finnish Centre for Easy Language, 22 October 2019.

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

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

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

Start Date: Not identified

End Date: Not identified

IRM Design Report Assessment	IRM Implementation Report Assessment
<ul style="list-style-type: none"> • Verifiable: Yes • Relevant: Access to information • Potential impact: Moderate 	<ul style="list-style-type: none"> • Completion: Limited • Did it Open Government? Did not change

This commitment aimed to address an accountability deficit caused by the increase of public-private partnerships in the provision of public services by extending the so-called *access to information principle* beyond its current scope. The access to information principle (Act on the Openness of Government Activities, Section 1) obliges Finnish public administration to make documents relating to decision making publicly available. This commitment sought to expand this principle to cover public services that are produced by corporate entities owned or controlled by the public sector, as opposed to services that are produced by public agencies themselves, which already fall within the ambit of the access to information principle.²

This commitment was not completed during the implementation period, as the implementation required legislative change. In June 2019, the Ministry of Justice published a 214-page report regarding the expansion of the Act on the Openness of Government Activities.³ The report outlines three possible models to amend the Act to meet the aims of this commitment (narrow, basic, and extended models). In June 2019, the Finnish government committed to assessing “whether the scope of application of the Act should be broadened to cover legal entities owned or controlled by the public sector”.⁴

Whether this commitment will result in concrete changes in government practice cannot be determined at this time. The publication of the government report and the partial inclusion of this commitment in the government program mark positive but limited steps. Because these measures do not amount to changes in legislation or government practice, the commitment did not open government during the implementation period.

¹ Open Government III Action Plan (2017-2019): Finland, https://www.opengovpartnership.org/wp-content/uploads/2017/05/Finland_NAP_2017-2019_EN.pdf

² Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf

³ “Julkisuuslain soveltamisalan laajentaminen,” Ministry of Justice, 2019 (31), https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/161693/OM_31_19_Julkisuuslain_soveltaminen_180619.pdf

⁴ Programme of Prime Minister Antti Rinne’s Government, 6 June 2019, https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/161664/Inclusive%20and%20competent%20Finland_2019_WEB.pdf?sequence=9&isAllowed=y. On December 2019, the Government of Antti Rinne was replaced by the Government of Sanna Marin, which fully adopted the government programme of June 2019.

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

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

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

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

Start Date: Not identified

End Date: Not identified

IRM Design Report Assessment	IRM Implementation Report Assessment
<ul style="list-style-type: none"> • Verifiable: No • Relevant: Access to information • Potential impact: Minor 	<ul style="list-style-type: none"> • Completion: Complete • Did it Open Government? Marginal

This commitment sought to improve the level of understanding on access to information legislation among civil servants, through increased training. According to the interviews conducted for the 2017-2019 IRM Design Report, there is currently a clear need for improvement in the application and know-how of access to information legislation in the Finnish public administration.² The commitment sought to ensure the adequate execution of the current legal standard set by the Act on the Openness of Government Activities.

During the implementation period, the Finnish government facilitated in-person and online training for civil servants on access to information legislation.³ In June 2019, the government committed to strengthening the public administration’s compliance with the Act on the Openness of Government Activities “by setting a stricter obligation for authorities to comply with the Act and the related legal practice and case law in a manner that promotes transparency and by clarifying the sanctions that can be imposed for violations of the Act”.⁴ Because the commitment does not outline measures other than civil servant training and education, its implementation status is complete.

According to the international ombudsman of the Union of Finnish Journalists, journalists continue to face issues regarding inadequate compliance with access to information legislation.⁵ Some areas of government work better than others in this policy area,⁶ but it is difficult to establish a systematic cross-government evaluation of the current practice or its improvement over the implementation period.⁷

Overall, the implementation of this commitment saw some change in government practice, but its effect on government openness was marginal.

¹ Open Government III Action Plan (2017-2019): Finland, https://www.opengovpartnership.org/wp-content/uploads/2017/05/Finland_NAP_2017-2019_EN.pdf

² Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf

³ Avoimen hallinnon III toimintaohjelman toimeenpano: Vahvistetaan julkisuuslakiosaamista hallinnossa, Ministry of Finance, <https://avoinhallinto.fi/toimeenpano/vahvistetaan-julkisuuslakiosaamista-hallinnossa/>

⁴ Programme of Prime Minister Antti Rinne's Government, 6 June 2019,

https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/161664/Inclusive%20and%20competent%20Finland_2019_WEB.pdf?sequence=9&isAllowed=y

⁵ Juha Rekola, International Ombudsman, The Union of Journalists Finland, 7 October 2019.

⁶ Juha Rekola, International Ombudsman, The Union of Journalists Finland, 7 October 2019.

⁷ Transparency International – Finland, 30 October 2019.

5. Publishing state procurement data to citizens

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

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

Start Date: Not identified

End Date: Not identified

IRM Design Report Assessment	IRM Implementation Report Assessment
<ul style="list-style-type: none"> • Verifiable: Yes • Relevant: Access to information • Potential impact: Minor 	<ul style="list-style-type: none"> • Completion: Complete • Did it Open Government? Major

This commitment outlined the Finnish government’s plans to make state procurement data available as open data and make this data accessible through an online service (openprocurement.fi). The procurement activities of the Finnish government are public under the Act on the Openness of Government Activities, excluding strategically sensitive accounting units such as the Ministry of Defence. Government procurement information has previously been available to the public by request only.²

This commitment was completed in September 2017.³ The publication of procurement data as open data was part of a commitment in Finland’s second action plan (2015-2017), which explains the expeditious completion.⁴ The new part of the present commitment is the addition of the online service (openprocurement.fi), which improves the accessibility of the raw data for persons who do not wish to query large datasets themselves. As a result, individuals and organizations are able to access government procurement information without having to submit access to information requests.

The preliminary results of this commitment in opening government are positive. According to the Head of Business and Competition Affairs of the Finnish Association of Federation of Finnish Enterprises, the open access service has increased confidence in the professionalism of government purchases and the appropriate legal implementation of government procurement processes.⁵ Since its commencement, the online service executed by Hansel Ltd has won multiple national and international awards, particularly for its user-friendly interface design.⁶ While the 2017-2019 IRM Design Report stressed the overlap between the commitments of the second and third action plans regarding the publishing of procurement data as open data, the addition of a well-executed open access service has ensured the accessibility and usability of this information to both organizations and the general public. This practice could be extended to cover regions and municipalities.⁷

Through the implementation of this commitment, the Finnish government has improved the accessibility of state procurement information and the channels to disclose it. This marks a major improvement in the status quo.

¹ Open Government III Action Plan (2017-2019): Finland, https://www.opengovpartnership.org/wp-content/uploads/2017/05/Finland_NAP_2017-2019_EN.pdf

² Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf

³ Avoimen hallinnon III toimintaohjelman toimeenpano: Julkaistaan valtion hankintatiedot kansalaisille, <https://avoinhallinto.fi/toimeenpano/julkaistaan-valuation-hankintatiedot-kansalaisille/>

⁴ Open Government II Action Plan (2015-2017): Finland, https://www.opengovpartnership.org/wp-content/uploads/2019/06/OGP_Action_Plan_Finland-2015_2017.pdf; Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf

⁵ Satu Grekin, Head of Business and Competition Affairs, The Finnish Association of Federation of Finnish Enterprises, email interview, 10 October 2019.

⁶ Avoimen hallinnon III toimintaohjelman toimeenpano: Julkaistaan valtion hankintatiedot kansalaisille, <https://avoinhallinto.fi/toimeenpano/julkaistaan-valuation-hankintatiedot-kansalaisille/>; 2019 Interaction Awards, Best in Category: Facilitating communication between people and communities, <http://awards.ixda.org/2019-interaction-awards/>; Vuoden huiput 2017, Hopeahuippu: Innovatiivisuus, <https://www.vuodenuiput.fi/fi-FI/arkisto/53047/>

⁷ Satu Grekin, Head of Business and Competition Affairs, The Finnish Association of Federation of Finnish Enterprises, email interview, 10 October 2019.

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

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

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

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

Start Date: Not identified

End Date: Not identified

IRM Design Report Assessment	IRM Implementation Report Assessment
<ul style="list-style-type: none"> • Verifiable: No • Relevant: Access to information • Potential impact: Minor 	<ul style="list-style-type: none"> • Completion: Substantial • Did it Open Government? Marginal

This commitment sought to ensure the openness of government preparatory work during a major regional administration reform (Regional Reform), by making government-provided information on the content and reasons behind the Regional Reform clear and accessible to all citizens. The proposed reform was historic in its scale and ambition, but it failed to pass under the Government of Juha Sipilä.²

During the preparatory stage of the Regional Reform, the Finnish government ran an outreach program (Maakunta tutuksi, www.omamaakunta.fi), commissioned a report on the role of government-civil society partnerships in the facilitation of this reform, and advanced open government principles through a Democracy and Participation Network comprised of civil servants from different pilot regions.³ At the end of the implementation period, this commitment’s implementation was substantial, as the government had not provided evidence of carrying out the focus groups mentioned in the commitment.⁴

The research conducted for this report indicates that the government succeeded in its outreach during the preparation of the Regional Reform.⁵ While government-provided information on the reform was difficult for average citizens to understand,⁶ the government was able to involve relevant stakeholder groups in its outreach activities.⁷ Aside from electronic channels, the government disseminated information on the content and reasons behind the reform through local newspapers, events, and government-civil society partnerships.⁸ Overall, the preparatory work for the Regional Reform has contributed to the mainstreaming of open government principles and citizen engagement,⁹ and it can serve as a template for future public sector reforms.

By implementing this commitment, the Finnish government improved the quality and reach of government-provided information and created participation opportunities in relation to this specific reform. However, the overall impact of this commitment on government openness beyond the implementation period was marginal.

¹ Open Government III Action Plan (2017-2019): Finland, https://www.opengovpartnership.org/wp-content/uploads/2017/05/Finland_NAP_2017-2019_EN.pdf

² Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf

³ Avoimen hallinnon III toimintaohjelman toimeenpano: Laaditaan maakuntahallinnosta selkeä ja ymmärrettävä kuvaus sekä viestitään selkeästi mikä maakuntauudistuksessa muuttuu ja miksi, <https://avoinhallinto.fi/toimeenpano/laaditaan->

[maakuntahallinnosta-selkea-ja-ymmarrettava-kuvaus-seka-viestitaan-selkeasti-mika-maakuntauudistuksessa-muuttuu-ja-miksi/](#)

⁴ Maakunta- ja sote-uudistuksen loppuraportti: Kokemuksia valmistelutyöstä, oppeja sekä johtopäätöksiä, Valtiovarainministeriön julkaisuja, 2019 (40), <https://vm.fi/documents/10623/13586275/Maakunta-+ja+sote-uudistuksen+loppuraportti/f8e749d4-fa0a-c295-739c-3f1931213306/Maakunta-+ja+sote-uudistuksen+loppuraportti.pdf>

⁵ Transparency International – Finland, 30 October 2019; Paula Karppinen, Regional Development Manager, Kainuu Region, 9 November 2019.

⁶ Maakunta- ja sote-uudistuksen loppuraportti: Kokemuksia valmistelutyöstä, oppeja sekä johtopäätöksiä, Valtiovarainministeriön julkaisuja, 2019 (40), <https://vm.fi/documents/10623/13586275/Maakunta-+ja+sote-uudistuksen+loppuraportti/f8e749d4-fa0a-c295-739c-3f1931213306/Maakunta-+ja+sote-uudistuksen+loppuraportti.pdf>

⁷ Anne Pyykkönen, Development Manager, North Karelian Society for Social Security, 17 October 2019. In North Karelia, these stakeholder groups included at least the North Karelian Society for Social Security, Save the Children, Martha Organisation, Association of Rural Culture and Education, Youth Workshop of Joensuu (Joensuun nuorisoverstas), North Karelia's branch of the Association of Finnish Pensioners (Eläkkeensaajien Pohjois-Karjalan piiri ry) and North Karelia's branch of the Finnish Pensioner's Federation (Eläkeliiiton Pohjois-Karjalan piiri ry). JANE ja maakuntauudistus: JANE maakuntauudistuksen muutosfoorumina, <https://www.jelli.fi/pohjois-karjalan-jarjestoasiain-neuvottelukunta-jane/vaikuttamistoiminta/jane-muutosfoorumina/>

⁸ Anne Pyykkönen, Development Manager, North Karelian Society for Social Security, 17 October 2019.

⁹ Paula Karppinen, Regional Development Manager, Kainuu Region, 9 November 2019.

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

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

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

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

Start Date: Not identified

End Date: Not identified

IRM Design Report Assessment	IRM Implementation Report Assessment
<ul style="list-style-type: none"> • Verifiable: Yes • Relevant: Unclear • Potential impact: None 	<ul style="list-style-type: none"> • Completion: Complete • Did it Open Government? Did not change

This commitment related to the Finnish government’s plans to expand open government principles and ways of working to cover regional administrative structures created by the Regional Reform. This reform was interrupted by a change of government in spring 2019, but the pilot regions continue to exist as local strategic partnerships. As noted in the 2017-2019 IRM Design Report, the commitment was not directly relevant to OGP values, as it lacked an explicitly stated public-facing component.²

As part of this commitment, the Finnish government organized open government training in four out of eight pilot regions in co-operation with the Association of Finnish Local and Regional Authorities.³ The government also updated its existing open government principles to cover regional administration actors.⁴ At the end of the implementation period, the status of this commitment was fully completed.

The impact of the outlined measures on access to information, civic participation, or public accountability is difficult to verify.⁵ While the government and region-level communication and civic participation possibilities during the Regional Reform were generally perceived positively,⁶ the implementation of this commitment did not lead to demonstrable changes in open government. In one of the pilot regions, a working group overseeing the development of regional democracy and participation sought to establish regional participatory bodies (including councils and advisory boards for young people, elderly people, and persons with disabilities) after the Regional Reform was discontinued. However, the regional steering group decided that establishing such bodies was not possible due to the absence of sufficient resources.⁷ This lack of resources has led to significant job losses and other cost-saving measures in regional administration, following the discontinuation of the Regional Reform.⁸ In terms of this commitment, the lack of government success to pass the public sector reform, combined with the lack of clear problem-solution framing in the commitment text, contributed to its limited results.

By implementing this commitment, the Finnish government created limited participation opportunities to inform and engage citizens during the Regional Reform. However, because these measures were limited to this now-defunct reform, they have not improved the status quo.

¹ Open Government III Action Plan (2017-2019): Finland, https://www.opengovpartnership.org/wp-content/uploads/2017/05/Finland_NAP_2017-2019_EN.pdf

² Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf

³ Avoimen hallinnon III toimintaohjelman toimeenpano: Järjestetään maakuntahallinnon toimijoille koulutusta avoimen hallinnon periaatteista ja toimintatavoista, <https://avoinhallinto.fi/toimeenpano/jarjestetaan-maakuntahallinnon-toimijoille->

[koulutusta-avoimen-hallinnon-periaatteista-ja-toimintatavoista/](#); Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland), 6 February 2019.

⁴ Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland), 6 February 2019.

⁵ Paula Karppinen, Regional Development Manager, Kainuu Region, 9 November 2019.

⁶ Transparency International – Finland, 30 October 2019; Paula Karppinen, Regional Development Manager, Kainuu Region, 9 November 2019.

⁷ Paula Karppinen, Regional Development Manager, Kainuu Region, 9 November 2019.

⁸ 'Pohjois-Karjalan Siun sote -kuntayhtymä aloittaa yt-neuvottelut, vähennystarve 200 henkilötyövuotta', Helsingin Sanomat, 31 October 2019.

III. Multi-stakeholder Process

The Finnish multi-stakeholder process did not go through significant changes between the design and implementation phases. Finland continued to perform well in terms of the multi-stakeholder forum mandate, composition, and conduct. During the implementation process, government-civil society engagement took place through the multi-stakeholder forum and events organized in co-operation with CSOs.

3.1 Multi-stakeholder process throughout action plan implementation

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. Finland **did not** act contrary to OGP process.¹

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

Table [3.2]: Level of Public Influence

The IRM has adapted the International Association for Public Participation (IAP2) "Spectrum of Participation" to apply to OGP.² 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	During implementation of action plan
Empower	The government handed decision-making power to members of the public.		
Collaborate	There was iterative dialogue AND the public helped set the agenda.		
Involve	The government gave feedback on how public inputs were considered.	✓	✓
Consult	The public could give inputs.		
Inform	The government provided the public with information on the action plan.		
No Consultation	No consultation		

In Finland, the multi-stakeholder forum (MSF) consists of several groups: the Open Government Team and Support Group, the Advisory Board for the Civil Society Policy (KANE), the Civil Servants Network and Executive Committee, and the Local Democracy Network of Municipalities. The groups have varying advisory, decision-making, and oversight roles over different parts of the OGP process.³ The Open Government Support Group has solid CSO representation and met 11 times during the implementation period. At least some MSF meetings allowed remote participation. Overall, the MSF did not go through significant changes between the design and implementation periods.⁴

Some commitments were partly implemented in co-operation with CSOs,⁵ but the extent of this co-operation falls short of the government-civil society engagement required for the Collaborate level

on the IAP2 Spectrum of Participation. This is because the co-operation was limited to individual events and none of the commitments were fully implemented through government-civil society collaboration. During the implementation period, Finland continued to show evidence of strong performance in areas of multi-stakeholder forum mandate, composition, and conduct. Moving forward, however, the Finnish government could ensure that the non-governmental members of the MSF are selected through a fair and transparent process. Currently, the non-governmental members of the Support Group are hand-picked based on their expertise in different commitment areas.⁶

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

² “IAP2’s Public Participation Spectrum,” IAP2, 2014.

http://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/foundations_course/IAP2_P2_Spectrum_FINAL.pdf.

³ Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf.

⁴ Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland), 6 February 2019.

⁵ Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland), 6 February 2019.

⁶ Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf.

IV. Methodology and Sources

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

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual¹ and in Finland's Design Report (2017-2019).²

Interviews and stakeholder input

As part of this assessment, the IRM researcher received the following stakeholder input by email:

- Juha Rekola, International Ombudsman, The Union of Journalists Finland, 8 October 2019.
- Satu Grekin, Head of Business and Competition Affairs, The Federation of Finnish Enterprises, 10 October 2019.
- Elina Pekkarinen, Ombudsman for Children and Terhi Tuukkanen, Senior Researcher, Office of the Ombudsman for Children, 16 October 2019.
- Anne Pyykkönen, Development Manager, North Karelian Society for Social Security, 17 October 2019.
- Leealaura Leskelä, Development Manager, Finnish Centre for Easy Language, 22 October 2019.
- The Union of Local Youth Councils in Finland, 30 October 2019.
- Transparency International – Finland, 30 October 2019.
- Johanna Nurmi, Ministerial Adviser, Ministry of Finance (Finland), 6 November 2019.
- Paula Karppinen, Regional Development Manager, Kainuu Region, 9 November 2019.

¹ IRM Procedures Manual, V.3, <https://www.opengovpartnership.org/documents/irm-procedures-manual>

² Independent Reporting Mechanism (IRM): Finland Design Report 2017– 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/Finland_Design-Report_2017-2019_EN.pdf

Annex I. Overview of Finland’s performance throughout action plan implementation

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

Annex II. IRM Indicators

The indicators and method used in the IRM research can be found in the IRM Procedures Manual.¹ 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*.

Results oriented commitments?

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

- I. **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.').

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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 behavior 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.”)?

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. To receive a star, a commitment must meet several criteria:

- The commitment’s design should be **Verifiable, Relevant** to OGP values, and have **Transformative** potential impact. As assessed in the Design Report.
- The commitment’s implementation must be assessed by IRM Implementation Report as **Substantial** or **Complete**.

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

¹ “IRM Procedures Manual,” OGP, <https://www.opengovpartnership.org/documents/irm-procedures-manual>