

Independent Reporting Mechanism (IRM): Sweden Design Report 2019- 2021

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Table of Contents

Executive Summary: Sweden	2
I. Introduction	5
II. Open Government Context in Sweden	6
III. Leadership and Multistakeholder Process	10
IV. Commitments	14
1. A national open data action plan	15
2. Make open data that can best benefit society accessible	18
3. Promote capacity for open and data-driven innovation in collaboration between research, business and civil society	20
4. Dialogue with civil society on the opportunities of digitisation, open data and collaboration	22
V. General Recommendations	24
VI. Methodology and Sources	28
Annex I. Commitment Indicators	30



Executive Summary: Sweden

Sweden's fourth action plan includes commitments on creating a national open data action plan, publishing priority datasets, and supporting data-driven innovation and uptake. Most of the commitments fall under the scope of work of the Agency for Digital Government, and there were few opportunities for non-government stakeholders to provide input on the action plan. Moving forward, Sweden could consider using future action plans to address transparency of public procurement data and lobbying.

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. Sweden joined OGP in 2011. Since, Sweden has implemented three action plans. This report evaluates the design of Sweden's fourth action plan.

General overview of action plan

Sweden continues to rank among the best performers in transparency and anti-corruption globally. The fourth action plan focuses on open data, including data-driven innovation and digitisation of the public sector.

The development of Sweden's fourth action plan was led by an independent third-party consultant, and mostly consisted of surveys and individual interviews with stakeholders. However, there was no available evidence that any open consultations took place for stakeholders to submit their proposals for inclusion in the action plan.

The Ministry of Infrastructure oversees Sweden's involvement in OGP and the commitments in the action plan largely consist of existing activities that fall under the scope of work of the Ministry's Agency for Digital Government (DIGG). The commitments involve proposing a national open data action plan, publishing priority datasets, encouraging data-driven innovation solutions to societal challenges, and discussing digitisation of the public sector with civil society.

Table 1. At a glance

Participating since: 2011
 Action plan under review: 4
 Report type: Design
 Number of commitments: 4

Action plan development

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

Action plan design

Commitments relevant to OGP values: 4 (100%)
 Transformative commitments: 0
 Potentially starred commitments: 0



Table 2. Noteworthy commitments

Commitment description	Moving forward	Status at the end of implementation cycle
Commitment I: National open data action plan	To maximise the new national open data action plan, the IRM recommends continuously consulting data users during its implementation, including civil society organisations and open data experts. The IRM also recommends raising awareness and promoting its usage among public agencies that are responsible for publishing data.	Note: this will be assessed at the end of the action plan cycle.

Recommendations

IRM recommendations aim to inform the development of the next action plan and guide implementation of the current action plan. Please refer to Section V: General Recommendations for more details on each of the below recommendations.

Table 3. Five KEY IRM Recommendations

Conduct formal and regular consultations with stakeholders to facilitate co-creation of future OGP commitments
Establish a multi-stakeholder forum to oversee the OGP process and create an online repository for all OGP-related information in Sweden
Improve commitment design by including milestones with measurable outcomes and clear outputs
Take steps to develop a centralised portal for open data on public procurement, ensuring that data is available in open format
Take initial steps towards establishing an open register on lobbying

ABOUT THE IRM

OGP's Independent Reporting Mechanism (IRM) assesses the 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 complete commitments. Civil society and government leaders use these evaluations to reflect on their own progress and determine if actions have impacted people's lives.

Sweden joined OGP in 2011. This report covers the development and design of Sweden's fourth action plan for 2019-2021.

The Independent Reporting Mechanism of OGP has conducted 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 Sweden

Sweden continues to rank among the best performers in transparency and anti-corruption globally. The fourth action plan focuses on open data, including data-driven innovation and digitisation of the public sector. There remains room for improvement in Sweden regarding the transparency of lobbying, asset declarations by public officials, and public procurement.

Transparency and access to information (legal framework and practice)

Sweden has a long tradition of government transparency and access to information dating to the Freedom of the Press Act of 1766. The 1949 Freedom of the Press Act gives the public the right to access official documents submitted to or developed by the government.¹ Citizens may appeal the government decision not to disclose requested information to the Parliamentary Ombudsman, who then provides a verdict. Sweden ranked 40th out of 128 countries in the Centre for Law and Democracy's 2019 Global Right to Information (RTI) rating, receiving 101 out of 150 possible points.² According to the RTI findings, areas for improvement in Sweden's access to information legislation include requesting procedures, exceptions and refusal, and promotional measures.

Open data

Sweden has one of the highest rates of digital literacy in the world. Swedish civil society is active, tech-oriented, and, in recent years, has strived to popularise the concept of open data among public officials and the general public. Sweden's open data portal dataportal includes data on topics such as education, health, and the environment.³ Sweden ranked 14 out of 114 countries in the 2016 Open Data Barometer, though its rank dropped compared to earlier years.⁴ However, in the European Data Portal's 2019 Open Data Maturity Report, Sweden was still categorised as an open data "Follower" among the EU 28+.⁵ The Agency for Digital Government (DIGG) was created in September 2018 under the Ministry of Infrastructure. DIGG is tasked with advancing Sweden's digital governance transformation and addressing the public administration's open data needs.⁶ DIGG took over the open data assignments of the National Archives and the assignments on re-use of public sector information (PSI) of the Swedish Agency for Economic and Regional Growth.⁷

In 2011, the Ministry of Foreign Affairs and the Swedish International Development Cooperation Agency (Sida) developed the openaid.se portal, which enables the public to track when, to whom, and for what purposes aid funds have been disbursed, and with what results.⁸ Data on openaid.se is published according to the International Aid Transparency Initiative (IATI) standard and the portal also allows the public to directly provide feedback to Sida.⁹

Open data has been included in Sweden's previous OGP action plans and is a focus in the fourth plan. Under Commitment 2 from Sweden's third action plan (2016-2018), the National Archives significantly increased both the number of available datasets on dataportal and the number of visitors to the portal.¹⁰ DIGG is highly involved in Sweden's fourth action plan (2019-2021), in which the commitments include the drafting of a national open data action plan (Commitment 1), supporting the publication of high-value data (Commitment 2), and promoting data-driven innovation (Commitment 3).

Civil Liberties and Civic Space

Sweden has a strong tradition of respect for civil liberties, freedom of expression, and independent media. The CIVICUS Monitor rates conditions for civil society or civic space in Sweden as "open".¹¹ Sweden ranks fourth in the world in Reporters Without Borders' 2020 World Press Freedom Index' (down from third in the 2019 Index).¹² The country also received the maximum number of points in Freedom House's 2020 Freedom in the World Index in the areas of civil liberties, political pluralism, and participation.¹³ Under Commitment 4 in the third action plan, Sweden piloted a new format for consultations between the government and civil society, called "sagråd", and the government formally institutionalised *sagråd* as part of its core set of consultation methods.¹⁴ Commitment 4 in the fourth action plan calls for civil society-government dialogues to address the challenges of

digitisation, especially linked to open data, innovation, and collaboration, including through sakråd.

In response to the COVID-19 pandemic, the Swedish government issued an ordinance prohibiting events and assemblies larger than 50 people "for the time being," and allowing local officials to restrict smaller gatherings as well.¹⁵ The government has also put in place recommendations in are expected to be respected by the population, companies and authorities.¹⁶ However, the government did not institute wider lockdowns.

Accountability and anticorruption

Sweden continues to rank highly in most international studies on corruption perception. The country ranked fourth out of 198 countries in Transparency International's 2019 Corruption Perception Index (with a score of 85 out of 100 possible points).¹⁷ In 2016, Sweden became the first Scandinavian country to pass a dedicated whistleblower protection legislation, which included retaliation protection for all employees, the right to report a wide range of crimes and offenses, and compensation for unfair dismissal and other personnel actions.¹⁸ More recently, the EU's 2019 Directive on Whistleblowing requires all EU Member States to transpose its provisions into their national legal and institutional systems by December 2021.¹⁹ In June 2020, an Exploratory Committee delivered a proposal for a new Whistleblowing Act in Sweden, intended to replace the existing Act.²⁰

Lobbying is not currently regulated in Sweden and there is no specific obligation for registration of lobbyists or reporting of contacts between public officials and lobbyists.²¹ Sweden does not currently publish datasets related to lobbying activities in the country.²² TI and Open Knowledge Sweden have noted that there remain concerns in Sweden over "revolving doors between high-level political posts and big corporations", and that many former MPs enter the lobbying industry after leaving politics.²³ They also note that the Swedish Parliament is reluctant to legislate for greater transparency of lobbying and that MPs have divergent opinions on the matter.²⁴

Political party financing in Sweden is governed by the 1972 Act on State Financial Support to Political Parties (amended 2018), the 2005 Election Act (amended 2019), and the 2018 Act on Transparency of Party Financing (amended 2019).²⁵ According to research by Open Knowledge Sweden and TI Latvia, Swedish legislation places few limits on both income and spending by parties and does not mandate a centralised register of political financing.²⁶ Reporting by Swedish political parties is limited to incomes and does not cover the expenditures, assets, or debts of the parties.²⁷ Furthermore, there are no specific requirements for the information to be in open data format²⁸ and the amount of individual donations and the identity of donors must be requested separately from the agency.²⁹

Under the Public Procurement Act (amended in 2016), only parties with legitimate interests can have access to information on suppliers and tenders up until the award decision.³⁰ Public procurement in Sweden is highly decentralised, and it is not mandatory to publish procurement notices and other documents centrally.³¹ Instead, most contracting authorities use private publication services to publish tender documents.³² Sweden is the only country in Europe that does not have a publicly owned tender database. This means that the state has to buy procurement data from private actors.³³

To implement the Fourth EU Anti-Money Laundering Directive, Sweden issued a new Act on Measures against Money Laundering and Terrorist Financing in August 2017. Under a parallel Act on Registration of Beneficial Owners, legal entities and legal arrangements must obtain and submit to the Swedish Companies Registration Office reliable information on their beneficial owners and the extent of their interest in the legal entity. Company information, including beneficial ownership, is publicly available on the register maintained by Bolagsverket (the Swedish Companies Registration Office).³⁴ However, to obtain beneficial ownership information in machine-readable format, users must pay for a 6250 SEK (about EUR600) package.³⁵

Budget Transparency

In the International Budget Partnership (IBP)'s 2019 Open Budget Survey, Sweden received 86 out of 100 points in transparency, ranking third out of 117 countries.³⁶ Sweden's score is well above the global average (45) and the OECD average (68). Sweden received 19 out of 100 points in public participation in the budget process (compared to global and OECD averages of 14 and 23 points, respectively). In particular, the IBP notes that the public currently has few opportunities to participate in the budget formulation and implementation processes.³⁷

In 2018, TI and Open Knowledge Sweden found that available data on Sweden's government budget and spending to be fully in line with open data standards.³⁸ The complete proposed state budget for each fiscal year as well as amendments are published on the Swedish Government's website in Excel format.³⁹ Furthermore, the Swedish Financial Supervisory Authority (ESV) publishes state spending information monthly in Excel format and provides independent monthly forecasts for the state budget.⁴⁰

¹ The Freedom of the Press Act, 1949, https://www.right2info.org/laws/Sweden_freedom_Press_act.pdf

² Global Right to Information Rating, Sweden, <https://www.rti-rating.org/country-data/Sweden/>

³ <https://opnadata.se/#noscroll>

⁴ Open Data Barometer, Global Report, <https://opendatabarometer.org/4thedition/report/>

⁵ European Data Portal, Open Data Maturity Report 2019, p. 72,

https://www.europeandataportal.eu/sites/default/files/open_data_maturity_report_2019.pdf

⁶ OECD, Digital Government Review of Sweden, <https://www.oecd-ilibrary.org/sites/4679b611-en/index.html?itemId=/content/component/4679b611-en>

⁷ Open Knowledge Sweden, Open Data and the Fight Against Corruption in Latvia, Sweden and Finland, p. 21, http://delna.lv/wp-content/uploads/2018/11/OD4AC_SE_Final6.pdf

⁸ Open Data's Impact, OpenAid in Sweden, p. 5, <https://odimpact.org/files/case-study-sweden.pdf>

⁹ Ibid.

¹⁰ OGP, IRM Sweden End-of-Term report 2016-2018, p. 14, https://www.opengovpartnership.org/wp-content/uploads/2019/02/Sweden_End-Term_Report_2016-2018_EN.pdf

¹¹ Civicus, Monitor, Tracking Civic Space: Sweden, <https://monitor.civicus.org/country/sweden/>

¹² Reporters without Borders: Sweden, <https://rsf.org/en/sweden>

¹³ Freedom House, Freedom in the World 2020: Sweden, <https://freedomhouse.org/country/sweden/freedom-world/2020>

¹⁴ OGP, IRM Sweden End-of-Term report 2016-2018, p. 25, https://www.opengovpartnership.org/wp-content/uploads/2019/02/Sweden_End-Term_Report_2016-2018_EN.pdf

¹⁵ ICNL, COVID-19 Civic Freedom Tracker, <https://www.icnl.org/covid19tracker/?location=121&issue=&date=&type=>

¹⁶ "Visiting Sweden during the covid-19 pandemic", <https://www.krisinformation.se/en/hazards-and-risks/disasters-and-incidents/2020/official-information-on-the-new-coronavirus/visiting-sweden-during-the-covid-19-pandemic>

¹⁷ Transparency International, Corruption Perceptions Index, 2019, <https://www.transparency.org/en/cpi/2019/results/swe#details>

¹⁸ A Change of Direction, Whistleblower Protection in Sweden, <https://www.changeofdirection.eu/assets/briefings/EU%20briefing%20paper%20-%20Sweden%20-%20english.pdf>

¹⁹ Transparency International, A Vital Chance for Whistleblower Protection, <https://www.transparency.org/en/blog/a-vital-chance-for-whistleblower-protection>

²⁰ EU Whistleblowing Meter, Sweden – Transposition of the EU Directive on Whistleblowing, <http://euwhistleblowingmeter.polimeter.org/promise/14093>. The report in Swedish,

<https://www.regeringen.se/49f2d1/contentassets/8da2073fda1645ec946ca4eca8bd6b6a/okad-trygghet-for-visselblasare-sou-2020-38.pdf>

²¹ Open Knowledge Sweden, Open Data and the Fight Against Corruption in Latvia, Sweden and Finland, p. 17, https://delna.lv/wp-content/uploads/2018/11/OD4AC_SE_Final6.pdf

²² Ibid.

²³ Open Data and Political Integrity in the Nordic Region, p. 31, https://delna.lv/wp-content/uploads/2019/11/Open-Data_TI-LV_2019.pdf

²⁴ Ibid.

²⁵ Europam, Sweden, http://europam.eu/?module=country-profile&country=Sweden#info_PF

²⁶ Open Knowledge Sweden, Open Data and the Fight Against Corruption in Latvia, Sweden and Finland, p. 17, https://delna.lv/wp-content/uploads/2018/11/OD4AC_SE_Final6.pdf

²⁷ Open Data and Political Integrity in the Nordic Region, p. 37, https://delna.lv/wp-content/uploads/2019/11/Open-Data_TI-LV_2019.pdf

²⁸ Open Knowledge Sweden, Open Data and the Fight Against Corruption in Latvia, Sweden and Finland, p. 23, https://delna.lv/wp-content/uploads/2018/11/OD4AC_SE_Final6.pdf

²⁹ Open Data and Political Integrity in the Nordic Region, p. 37, https://delna.lv/wp-content/uploads/2019/11/Open-Data_TI-LV_2019.pdf

³⁰ Swedish Competition Authority, Swedish Public Procurement Act, <https://www.konkurrensverket.se/globalassets/english/publications-and-decisions/swedish-public-procurement-act.pdf>

³¹ Open Data and Political Integrity in the Nordic Region, p. 52, https://delna.lv/wp-content/uploads/2019/11/Open-Data_TI-LV_2019.pdf

³² Ibid. p. 52.

³³ Mihály Fazekas and Mara Mendes, “Recommendations for the Implementation of Open Public Procurement Data: An Implementer’s Guide”, Digiwhist, <https://opentender.eu/blog/2017-03-recommendations-for-implementation/>

³⁴ Bolagsverket register, <http://www.bolagsverket.se/>

³⁵ ICNL, COVID-19 Civic Freedom Tracker, <https://www.icnl.org/covid19tracker/?location=121&issue=&date=&type=>

³⁶ International Budget Partnership, Open Budget Survey 2019, Sweden,

<https://www.internationalbudget.org/sites/default/files/country-surveys-pdfs/2019/open-budget-survey-sweden-2019-en.pdf>

³⁷ [Ibid.](#)

³⁸ Open Knowledge Sweden, p. 6, http://delna.lv/wp-content/uploads/2018/11/OD4AC_SE_Final6.pdf

³⁹ Excel budget, in Swedish, <https://www.regeringen.se/sveriges-regering/finansdepartementet/statens-budget/statens-budget-som-excel/>

⁴⁰ ESV, State spending information and monthly forecasts, <https://www.esv.se/psidata/manadsutfall/>

III. Leadership and Multistakeholder Process

The development of Sweden's fourth action plan was led by an independent third-party consultant, and mostly consisted of surveys and individual interviews with stakeholders. The Ministry of Infrastructure oversees Sweden's involvement in OGP and the commitments in the action plan largely consist of existing activities that fall under the scope of work of the ministry's Agency for Digital Government (DIGG).

3.1 Leadership

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

The Ministry of Infrastructure currently oversees the OGP process in Sweden. During the first three action plans, OGP was under the responsibility of the Ministry of Foreign Affairs (MFA), and, in particular, the Department for Aid Management (UDSTYR). UDSTYR's leadership impacted the thematic content of the first three action plans, particularly the focus on foreign aid transparency.

During the third action plan (2016-2018), UDSTYR handed over responsibility for OGP to the Ministry of Finance between May and June 2017. There were two key reasons for this transfer. First, the MFA believed it had fulfilled most of the commitments in the scope of the action plan. Second, the thematic focus of Sweden's third OGP action plan saw a shift to more domestically-focused commitments: two of the four concerned government digitalisation and fell under the mandate of the Ministry of Finance.¹

The Ministry of Infrastructure was formed in April 2019, prior to the adoption of the fourth action plan. The Ministry took over some responsibilities previously handled by the Ministry of Finance, the Ministry of Enterprise and Innovation, and the Ministry of the Environment.² The Ministry of Infrastructure oversees the work of Sweden's Agency for Digital Government (DIGG), established in 2018. DIGG is tasked with advancing Sweden's digital governance transformation and addressing the public administration's open data needs. Three of the four commitments in the fourth action plan fall under the mandate of DIGG.

According to one of the points of contact to OGP at the Ministry of Infrastructure, there is a formal government decision that governs Sweden's involvement in OGP.³ There is no specific budget earmarked for OGP activities. However, DIGG has received 20 million SEK for the assignment on open data and data-driven innovation (which includes Commitment I on the creation of a national open data action plan).⁴ However, the budget for the government's upcoming data-strategy is not yet decided. All work on OGP in Sweden is handled by the two points of contact at the Ministry of Infrastructure.

3.2 Action plan co-creation process

The development of Sweden's fourth action plan was led by an independent digital consultant selected by the Ministry of Infrastructure, with limited oversight by the Ministry. The consultant published a final report that formed the basis of the action plan's content.⁵ As part of the process the consultant prepared a survey in consultation with an open data expert, which was circulated to civil society stakeholders via two umbrella members. According to the consultant's report, the survey targeted operational managers and other key people at various levels within relevant civil society organisation (CSOs). The report notes that the response rate to the survey was low and findings had to be supplemented by 12 interviews conducted between July-August 2018. The interviewees were selected according to their position or competence in the field. Among those interviewed were representatives of student unions, digital civil society actors, and some of the largest CSOs.⁶ The results from the interviews are not provided in the final report, however, the report notes that the insights informed the inclusion of certain activities in the action plan. The findings were also supplemented with additional third-party documents from 2018, including a 2018 OECD report on digitisation in Sweden.⁷ In addition, the action plan lists four consultation events that took place in June-July 2018 where civil society and public sector representatives discussed topics around digitisation and open data in Sweden, one of which was the Hack4Sweden event (4

July 2018).⁸ However, it is unclear how these events influenced the content of the action plan or if OGP commitments were discussed.

According to one civil society representative interviewed by the consultant during the development of the action plan, civil society was largely not involved in the development of the action plan and the commitments were included because the Ministry of Infrastructure and DIGG had already planned to do the activities.⁹ Civil society stakeholders had to create opportunities themselves and were mostly informed of the plan drafting by contacts in government.

On 20 May 2019, the point of contact to OGP at the Ministry of Infrastructure presented the draft action plan at an in-person event organised by Civic Tech Sweden.¹⁰ Participants had the opportunity to discuss the draft action plan as well as brainstorm ways for Sweden to improve dialogue between government and civil society and improve open data. However, by this point, it was no longer possible to influence the content of the action plan. The final action plan was formally adopted on 29 August 2019.¹¹

Table 4: Level of Public Influence

The IRM has adapted the International Association for Public Participation’s (IAP2) “Spectrum of Participation” to apply to OGP.¹² This spectrum shows the potential level of public influence on the contents of the action plan. In the spirit of OGP, most countries should aspire for “collaborate.”

Level of public influence		During development of action plan
Empower	The government handed decision-making power to members of the public.	
Collaborate	There was iterative dialogue AND the public helped set the agenda.	
Involve	The government gave feedback on how public input were considered.	
Consult	The public could give inputs.	
Inform	The government provided the public with information on the action plan.	✓
No Consultation	No consultation	

OGP Participation and Co-Creation Standards

In 2017, OGP adopted OGP Participation and Co-Creation Standards 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.

Sweden acted contrary to OGP process during the co-creation of the fourth action plan. This is because there is no evidence that a space existed for stakeholders to discuss the OGP process during development of the action plan. In addition, there is no evidence that the government or the independent consultant reported back or provided feedback to stakeholders on how their contributions were considered during the creation of the action plan. Therefore, the government did not meet the “Involve” requirement on the IAP2 spectrum (see Table 4) during development of the action plan, as assessed by the IRM.¹³

The following table provides an overview of Sweden's performance implementing the Co-Creation and Participation Standards throughout the 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	Status
1a. Forum established: Sweden does not have a formal multi-stakeholder forum to oversee OGP activities.	Red
1b. Regularity: There were no in-person consultation meetings during the development of the fourth action plan. The draft action plan was presented at an event on 20 May 2019, organised by Civic Tech Sweden.	Red
1c. Collaborative mandate development: A formal government decision governs Sweden's involvement in OGP. However, it is not clear if this decision was developed jointly with civil society.	Yellow
1d. Mandate public: Although a formal government decision governs Sweden's involvement in OGP, it is unclear if this mandate is publicly available.	Red
2a. Multi-stakeholder: Sweden does not have a multi-stakeholder forum to discuss OGP activities.	Red
2b. Parity: Sweden does not have a multi-stakeholder forum to discuss OGP activities. The extent of involvement by government stakeholders in the development of the fourth action plan is unclear.	Red
2c. Transparent selection: Sweden does not have a multi-stakeholder forum to discuss OGP activities. According to consultant's report, civil society representatives were selected for interviews based on their positions and/or competence in the field of open data and digitisation.	Red
2d. High-level government representation: There was no high-level government involvement in the development of Sweden's fourth action plan.	Red
3a. Openness: The selection of interviewees to inform the content of the action plan was carried out by the independent consultant and there is no available evidence that the process was open to any interested stakeholders. The 20 May 2019 meeting, where the draft action plan was presented, was open to anyone interested.	Red
3b. Remote participation: The 20 May 2019 meeting organised by Civic Tech Sweden, where the draft action plan was presented, was livestreamed on YouTube.	Yellow
3c. Minutes: The only available information on the development of the action plan was the report prepared by the independent consultant. There are no publicly available minutes of consultation meetings for the action plan.	Red

Action Plan Development	
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4a. Process transparency: During the development of the fourth action plan, Sweden did not maintain a national OGP website (or OGP webpage on a government website) with information on the national OGP process.	Red
4b. Documentation in advance: It is unclear if either the government or the independent consultant provided information on OGP to stakeholders in advance of the development of the fourth action plan.	Red
4c. Awareness-raising: It is unclear if any awareness-raising activities about OGP took place prior to or during the development of the fourth action plan.	Red
4d. Communication channels: The government did not facilitate direct communication with stakeholders on the process for the fourth action plan.	Red
4e. Reasoned response: It is unclear whether the independent consultant provided stakeholders with the reasoning behind decisions for the fourth action plan. The consultant's report does not explain how the action plan addressed the findings from the survey and stakeholder interviews that were conducted.	Red
5a. Repository: The Ministry of Infrastructure posted the fourth action plan to its website along with the independent study that served as the foundation for the co-creation process. However, at the time of writing this report (September 2020), Sweden does not maintain a publicly available online repository with information on the national OGP process.	Red

¹ OGP, IRM Sweden Progress Report 2016-2017, p. 10, https://www.opengovpartnership.org/wp-content/uploads/2018/10/Sweden_Mid-Term_Report_2016-2018_EN.pdf

² The Ministry of Infrastructure, in Swedish, <https://www.regeringen.se/pressmeddelanden/2019/04/infrastrukturdepartementet-pa-plats/>

³ Sumbat Daniel Sarkis, point of contact to OGP, Ministry of Infrastructure, email correspondence with IRM, 25 September 2020.

⁴ Ibid.

⁵ The consultant's final report, in Swedish, https://www.regeringen.se/4ae89e/globalassets/regeringen/block/kontaktblock/infrastrukturdepartementet/pressekreterare/open-gov_civilsamhallet_v.2.pdf

⁶ According to the final report prepared by the independent consultant, these stakeholders were: Åsa Paborn (Bilda), Petter Karlsson (Svenska kyrkan), Robin Harms Oredsson (Betahaus), Sophie Nordström (Natuskyddsföreningen), Ann-Katrin Persson (Sensus/Civos), Peter Borg (IdrottOnline), Ulrika Stuart Hamilton (Famna), Karolina Lisslö (Mattecentrum), Niss Jonas Carsson (Språkkraft), Maria Nordgren (Studieförbundet Bilda), Karoline Beronius (The Map Project, Kungl. Tekniska Högskolan - KTH), Göran Petterson (Forum).

⁷ OECD Reviews of Digital Transformation: Going Digital in Sweden, https://read.oecd-ilibrary.org/science-and-technology/oecd-reviews-of-digital-transformation-going-digital-in-sweden_9789264302259-en#page4

⁸ These four events included 1) 1 June 2018 in partnership with the strategic innovation programme Viable Cities and RISE (Research Institutes of Sweden), 2) 1 July in partnership with public transport service development company Samtrafiken, 3) 3 July in partnership with Region Västra Götaland, 4) 4 July, in partnership with Hack4Sweden and OneTeamGov.

⁹ Pierre Mesure, Digidem Lab & Civic Tech Sweden, email correspondence with IRM, 17 September 2020.

¹⁰ Civic Tech Sthlm: Have a say on the openness of Sweden!, <https://www.goto10.se/evenemang/civic-tech-sthlm-have-a-say-on-the-openness-of-sweden/?fbclid=IwAR2sLeSPR3pygMAh4Sz2BPOWTLmhNEJ25IBLluckmp2Ljy9EgrYEu0GXIK4>

¹¹ Sweden's OGP action plan 2019-2021, https://www.opengovpartnership.org/wp-content/uploads/2019/09/Sweden_Action-Plan_2019-2021_EN.pdf

¹² IAP2's Public Participation Spectrum, (IAP2, 2014), https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum_8.5x11_Print.pdf

¹³ IRM Guidance on minimum threshold for involve, <https://www.opengovpartnership.org/wp-content/uploads/2020/02/IRM-Guidance-Involve.pdf>

IV. Commitments

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

Commitments should be appropriate to each country's circumstances and challenges. OGP commitments should also be relevant to OGP values detailed in the *OGP Articles of Governance and Open Government Declaration* signed by all OGP-participating countries.¹ Indicators and methods used in the IRM research can be found in the IRM Procedures Manual.² A summary of key indicators the IRM assesses can be found in the Annex of this report.

General Overview of the Commitments

Sweden's fourth action plan includes four commitments, all pertaining to open data and improving civic technology. They include:

1. Developing a national open data action plan,
2. Making open data that can best benefit society accessible, with a focus on geodata, transportation, and health,
3. Promoting capacity for open and data-driven innovation in collaboration with research, business, and civil society,
4. Creating dialogue with civil society on the opportunities of digitisation, open data, and collaboration

Commitments 1-3 fall under the tasks and responsibilities of the Agency for Digital Government (DIGG), established in 2018. DIGG is tasked with promoting data-driven innovation and improving access to and reuse of open data. Several organisations will assist DIGG in implementing these commitments. For example, the Swedish Cadastral and Land Registration Agency (Lantmäteriet) and the Swedish Transport Administration (Trafikverket) will, respectively, help prioritise geodata and transportation data for Commitment 2. The innovation agency Vinnova will assist DIGG with Commitment 3. Commitment 4 falls under the responsibility of the Ministry of Infrastructure, with support from DIGG and the Ministry of Culture. According to the action plan, the Ministry of Infrastructure will also assist DIGG with implementing Commitment 1 (national open data action plan).

¹“Open Government Partnership: Articles of Governance”, OGP, 17 June 2019),

<https://www.opengovpartnership.org/articles-of-governance/>

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

I. A national open data action plan

Main Objective

“One common issue raised in all the studies carried out is that there is no national coordinated approach to open data and how Sweden should be working to develop it. As part of a wider whole of strategic data management, an open data action plan is therefore fundamental to working on this issue. This is also one of the most important recommendations regarding commitments in the OGP Action Plan submitted in Isaksson and Novak’s report.

As stated by OGP, open data is the cornerstone of open, collaborative administration. To demonstrate the Government’s ambitions with open data, Sweden must therefore draw up a national open data action plan. This task has been given to DIGG, which is to produce a proposed action plan for making open data more accessible and using it more widely on the basis of the OECD’s OURdata index.

In addition to strategically developing the issue, an action plan will also aid transparency in that it will clearly set out how the Government is prioritising and working with open data.”

Editorial Note: For the complete text of this commitment, please see Sweden’s 2019-2021 action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/09/Sweden_Action-Plan_2019-2021_EN.pdf

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Access to Information
Potential impact:	Moderate

Commitment Analysis

Although Sweden’s public sector is characterised by high levels of transparency, there remains room for improvement regarding open data availability and accessibility in the country. Prior to the start of the action plan, Sweden was one of the few Organisation for Economic Co-operation and Development (OECD) member countries that did not have a formal open data policy in place.¹ The OECD has noted that Sweden lagged behind other OECD countries in:

- defining overarching formal requirements for all ministries and agencies to publish and share data
- implementing open government data requirements (e.g. timeliness of data sharing, use of open formats) as part of performance indicators of organisations
- encouraging and guiding public sector organisations to carry out consultations with users to inform open data plans and prioritising data publication.²

Furthermore, Sweden ranked 23 out of the EU28+ countries in the European Commission’s 2019 Open Data Maturity Index, putting it in the “Follower” group.³ The Index notes that, although Sweden has guidelines that recommend all public bodies appoint a responsible person for open data, only a few public bodies comply with this recommendation.⁴

To improve open data infrastructure and policy framework and address these inconsistencies, this commitment aims to propose a national open data action plan for Sweden. The Agency for Digital Governance (DIGG) is responsible for creating the open data action plan proposal. This proposal for a national open data action plan is relevant to the OGP value of access to information. The commitment is verifiable, though the only planned activity is for DIGG to produce a proposed action plan, using the OECD’s OURdata index as a basis.⁵

The OECD has found that open data initiatives in Sweden are often “isolated and silo-driven,” and developed by small groups of public agencies rather than government-wide efforts.⁶ Therefore, the creation of a single, comprehensive open data strategy for all ministries and agencies could significantly improve open data availability and accessibility of open data in Sweden. In particular, it could help standardise open data publishing practices across all government ministries and agencies, including the format and timing of publication.

Ultimately, the potential impact of the national open data action plan will depend on its content and the way in which it is implemented across the government. According to a DIGG representative, all government agencies in Sweden are proposed to be covered by the open data action plan.⁷ DIGG will develop its action plan proposal through workshops with open data users and civil society working in open data.⁸ DIGG will also determine which datasets to include in the proposed action plan based on the expressed user needs on high-value datasets, according to the open data and public sector information (PSI) directive, as well as through an analysis of high-value data in the OURdata index. According to the Ministry of Infrastructure, there will be a consultation process during the creation of the strategy, which will involve representatives of the industry and IT sectors, civil society, public agencies, and municipal and regional governments.⁹ It should be noted, however, that the commitment calls for DIGG to provide a proposed action plan, and not a final plan. After DIGG develops its proposal, the Swedish parliament and responsible ministries must ensure its realisation.¹⁰

According to the action plan, the draft national open data strategy will be completed by March 2020.¹¹ According to the Ministry of Infrastructure, it is currently not decided whether the final open data action plan will have a revision process, but the plan will be continuously updated in collaboration with stakeholders.¹² In order to maximise the ambition of the new open data action plan, the IRM recommends the following:

- The government could continuously consult data users in its implementation, including CSOs and open data experts. This could help build mutual ownership of the open data action plan and ensure stakeholders are able to monitor compliance with its principles and recommendations.
- Periodically revisit and update the plan to ensure it continues to meet the needs of data users in Sweden.
- Once the action plan is in place, the IRM recommends raising awareness and promoting its usage among public agencies responsible for publishing data. For example, Ireland’s second OGP action plan included a commitment to develop an open data strategy 2017-2020 in consultation with relevant stakeholders, along with trainings and awareness raising among public servants on open data.¹³
- Lastly, the IRM recommends that Sweden’s open data action plan prioritise certain categories of data relevant to the context of the COVID-19 pandemic, in line with OGP guidance.¹⁴

¹ OECD, Digital Government Review of Sweden, p. 110, <https://www.oecd-ilibrary.org/docserver/f1b77740-en.pdf?expires=1599773456&id=id&accname=guest&checksum=28C563B1C64794B666A8FCE9460C372B>

² Ibid. p. 115.

³ European Data Portal, Open Data Maturity Report 2019, p. 72,

https://www.europeandataportal.eu/sites/default/files/open_data_maturity_report_2019.pdf

⁴ Ibid. p. 17.

⁵ OECD, Open, Useful and Re-usable Data (OURdata) Index: 2019, p.110, <http://www.oecd.org/gov/digital-government/ourdata-index-policy-paper-2020.pdf>

⁶ OECD, Digital Government Review of Sweden, p. 110, <https://www.oecd-ilibrary.org/docserver/f1b77740-en.pdf?expires=1599773456&id=id&accname=guest&checksum=28C563B1C64794B666A8FCE9460C372B>

⁷ Kristine Ulander, Agency for Digital Government, email correspondence with IRM, 18 September 2020.

⁸ The representatives will include, among others, open data transparency advocates, CSOs, startups, developers, researchers, and students. Civil servants varied from information managers, open data project managers, and management at both federal and municipal level.

⁹ Sumbat Daniel Sarkis, point of contact to OGP, Ministry of Infrastructure, email correspondence with IRM, 25 September 2020.

¹⁰ Kristine Ulander, Agency for Digital Government, email correspondence with IRM, 18 September 2020.

¹¹ The action plan, <https://www.digg.se/globalassets/dokument/publicerat/publikationer/handlingsplan-oppna-data.pdf>

¹² Sumbat Daniel Sarkis, point of contact to OGP, Ministry of Infrastructure, email correspondence with IRM, 25 September 2020.

¹³ OGP, IRM Ireland End-of-Term Report 2016-2018, p. 48, https://www.opengovpartnership.org/wp-content/uploads/2019/02/Ireland_End-Term_Report_2016-2018.pdf

¹⁴ OGP, A Guide to Open Government and the Coronavirus: Open Data, <https://www.opengovpartnership.org/documents/a-guide-to-open-government-and-the-coronavirus-open-data/>

2. Make open data that can best benefit society accessible

Main Objective

“As a first step and as a way for the public sector to lead the way, government bodies should be appointed to make such data that is considered to have high potential in terms of development, innovation, collaboration and commercial exploitation as accessible as possible. Collaboration with civil society forms part of this commitment, including representatives from civil society joining DIGG’s reference group to conduct a needs analysis and to survey impacts at opendata.se. This work will be launched with three workshops in late summer 2019.

The Government has tasked DIGG with particularly promoting data domains with major potential (I2019/01416/DF, I2019/01020/DF). Within this remit, the agency is initially to prioritise data in the following areas: traffic, labour market, health, geodata and open research data. The work is to be carried out in dialogue and consultation with a range of agencies and other actors affected, including sectoral agencies responsible for these areas and the Swedish Association of Local Authorities and Regions (SALAR). DIGG must also take into account the Swedish Research Council’s work on open research data and Vinnova’s work on open innovation. As well as increasing the capacity of the public sector to make open data accessible, DIGG is also to develop support and guidelines particularly geared towards the needs of those making further use of the data.”

Editorial Note: For the complete text of this commitment, please see Sweden’s 2019-2021 action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/09/Sweden_Action-Plan_2019-2021_EN.pdf

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Access to Information, Civic Participation
Potential impact:	Minor

Commitment Analysis

This commitment aims to identify and make more accessible certain priority datasets with “high potential in terms of development, innovation, collaboration and commercial exploitation”. According to the commitment, priority data will be identified for the following categories: traffic, labour market, health, geodata, and open research data.

The Agency for Digital Government (DIGG) will lead three workshops with primary data users to inform a needs assessment on the availability and usability of data on Sweden’s national open data portal opendata.se. DIGG will also develop guidelines for the public sector on best practices for sharing high-quality open data. According to a DIGG representative, DIGG will update the portal in accordance with the findings of the users’ needs assessment. In addition, DIGG will also develop a national application programming interface (API) catalogue to improve the searchability of data on the portal. Moreover, DIGG aims to standardise the frameworks and processes of publishing data in machine-readable formats on the national data portal. Finally, to facilitate communication in digital practices, DIGG will establish a forum for data users and create a section on the portal to publish articles of good examples of re-use in society.¹

The opening of prioritised datasets makes the commitment relevant to the OGP value of access to information. Furthermore, the planned workshops with civil society stakeholders to assist in data prioritisation makes the commitment relevant to civic participation. The workshops and guidelines are verifiable, though the commitment could have benefited from specific milestones and activities.

According to a DIGG representative, the specific categories of data for this commitment (health,

geodata, etc.) have high potential to encourage data-driven innovation and improve Sweden's open data maturity.² DIGG will work with responsible agencies who produce data in these categories to improve the standardisation, quality, and access to the data. The point of contact to OGP at the Ministry of Infrastructure also informed the IRM that the Swedish Cadastral and Land Registration Agency (Lantmäteriet) and the Swedish Transport Administration (Trafikverket) will produce geodata and transport data for this commitment, respectively.³

The Swedish Transport Administration publishes its own open data regarding infrastructure and events on state-owned roads and the railway network. However, there is currently no common database for all transport data, even though the dataportal.se has data sources in several different areas, including transport.⁴ Furthermore, according to a representative of the Swedish Transport Administration, transport data is in great demand in Sweden with respect to shorter travel times and smarter choices for modes of transport.⁵ Mobility is also a priority area in the EU's open data strategy.⁶ The Lantmäteriet currently has several e-services for the public to access maps and aerial photos. The data is digitalised according to national and international standards to facilitate reuse. However, the Lantmäteriet currently must charge fees for accessing its geodata.⁷

According to recent analysis by the Organisation for Economic Co-operation and Development (OECD) on digital governance in Sweden, the relevance of the potential benefits of open data for social value is not yet fully acknowledged in Sweden.⁸ Therefore, strengthening the publishing practices around certain data categories of high social value could help improve the opendata.se portal as well as Sweden's overall open data maturity. Furthermore, the guidelines to be developed by DIGG could help standardise open data practices across the public sector, particularly around searchability, format, and re-usability. Ultimately, the potential impact of the commitment will depend on the amount of high-value data that is made available and the extent of the improvements to the opendata.se portal. As written in the action plan, the commitment could lead to minor but important improvements in open data in Sweden.

¹ Kristine Ulander, Agency for Digital Government, email correspondence with IRM, 18 September 2020.

² Ibid.

³ Sumbat Daniel Sarkis, point of contact to OGP, Ministry of Infrastructure, email correspondence with IRM, 3 September 2020.

⁴ Information provided to the IRM during the pre-publication period of this report by Lars-Olof Hjärp, Swedish Transportation Administration, 20 October 2020.

⁵ Ibid.

⁶ See <https://ec.europa.eu/digital-single-market/en/content/european-digital-strategy>

⁷ Information provided to the IRM during the pre-publication period of this report by David Boman, Swedish Cadastral and Land Registration Agency, 7 October 2020.

⁸ OECD Digital Government Studies, Digital Government Review of Sweden: Towards a Data-driven Public Sector: Chapter 5, Opening up government data in Sweden: User engagement and value co-creation, <https://www.oecd-ilibrary.org/sites/flb77740-en/index.html?itemId=/content/component/flb77740-en>

3. Promote capacity for open and data-driven innovation in collaboration between research, business and civil society

Main Objective

“It is especially important that the data that is made available also contributes practically towards public benefit. Civil society, which has very deep and broad expertise in its specialist areas, may thus need additional initiatives to fully be able to leverage the resource that open data represents. Appropriate forms of collaboration are an important aspect in this respect, for example. It is also important to consider the role this plays in developing government policy. Enabling civil society to leverage open data to create a greater platform for analysis and expertise in its specialist areas opens greater opportunities for civil society to come up with proposed policies and initiatives.

It is also important that this type of innovation is not promoted for only one sector. DIGG has therefore been commissioned to increase the capacity of the public sector to conduct open and data-driven innovation in collaboration between research, industry and civil society. DIGG is to trial the platform for open and data-driven innovation developed by the Swedish Agency for Economic and Regional Growth: challengesgov.se, and to carry out communication and promotion initiatives that seek to increase participation from start-ups, small and medium-sized companies, civil society and other actors, e.g. international actors, on the platform for open and data-driven innovation.”

Editorial Note: For the complete text of this commitment, please see Sweden’s action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/09/Sweden_Action-Plan_2019-2021_EN.pdf

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Access to Information
Potential impact:	Minor

Commitment Analysis

In 2018, the Swedish Agency for Economic and Regional Growth launched the national platform challengesgov.se as part of a three-year initiative for open data.¹ The platform aims to increase the re-use of open data from the public administration and to highlight current societal challenges that can be solved with open and data-driven innovation.² Various challenges and contests of public interest are posted to the platform, where participating individuals and teams can propose their own innovative solutions using available public sector data. Winning solutions to these challenges and contests are posted to the platform.³

Under this commitment, the Agency for Digital Governance (DIGG) plans to use the challengesgov.se platform to encourage participation of start-ups, small and medium-sized companies, and civil society in developing data-driven innovation.⁴ According to a DIGG representative, a number of activities will be conducted in collaboration with the Swedish Agency for Economic and Regional Growth's Startup Sweden program and the innovation agency Vinnova to increase awareness and participation. Among these activities will be DIGG’s ongoing collaboration with stakeholders involved in public administration to develop a new concept for Hack4Sweden to promote open and data-driven innovation as an integral part of public administration. DIGG will test the new concept in a pilot at the end of 2020 and then launch it in 2021.⁵ Further DIGG activities will include:

- Holding a national hackathon (part of the Hack4Sweden event) for April 2019.
- A community hearing on citizen-driven innovation for May 2019.

- A networking day on open innovation with data as a strategy at the annual conference on public space for July 2019.
- Participation in the Civic Tech Sweden “OpenHeroines” meetup to talk about DIGG's government assignment and the pilot activities on challengesgov.se for November 2019.⁶
- A “data lab conference” for April 2020.⁷

The commitment is relevant to the OGP value of access to information due to its focus on leveraging open data among non-government actors. Overall, the potential impact of this commitment will largely depend on the success of the implementation of DIGG's planned trial activities for the challengesgov.se platform as well as the utility of the data-driven solutions that emerge. However, considering that the commitment does not specify how DIGG plans to use the platform to trial and promote its initiatives, it is difficult to assess the potential impact as higher than minor. According to a representative of the Swedish Agency for Economic and Regional Growth, the agency is currently waiting for a top management decision on the scope and financing of the work and whether it will go beyond current government assignments.⁸

¹ The national platform challengesgov.se, <https://challengesgov.se/om-oss/>

² European Data Portal, Open Data Maturity Report 2019, p. 38, https://www.europeandataportal.eu/sites/default/files/open_data_maturity_report_2019.pdf

³ Open Data award winners, “A pocket sized time machine - one of three winners of Stockholm Region Open Data Award” <https://challengesgov.se/stockholm-open-data-award-winners/>

⁴ DIGG, <https://www.digg.se/om-oss/vart-uppdrag/regeringsuppdrag/oppna-data-datadriven-innovation-och-ai>

⁵ Angela Yong, Swedish Agency for Economic and Regional Growth, email correspondence with IRM, 14 September 2020.

⁶ Civic Tech Sweden Facebook page, https://www.facebook.com/events/2789368691095968/?active_tab=discussion and Civic Tech Sweden YouTube, https://www.youtube.com/watch?v=wIN3mqJd_HM&t=23s

⁷ Vinnova, Data-driven innovation, <https://www.vinnova.se/e/datadriven-innovation/datalabb-och-datafabrik-som-nationell-resurs-2020/>, and <https://www.vinnova.se/e/datadriven-innovation/datalabb-datafabrik/>

⁸ Angela Yong, Swedish Agency for Economic and Regional Growth, email correspondence with IRM, 14 September 2020.

4. Dialogue with civil society on the opportunities of digitisation, open data and collaboration

Main Objective

“One particular aspect of OGP is precisely the promotion of open and transparent dialogue with civil society and citizens. In a specific communication, the Government has asserted that Swedish civil society is fundamentally stable and that Swedish policy has helped to improve the conditions in which civil society organisations operate, but that Sweden also has challenges that must be taken seriously, including a lack of public sector awareness of civil society and its conditions. Conducting an open dialogue between the Government Offices of Sweden and civil society representatives thus strengthens our OGP commitments and demonstrates the Government’s desire for collaboration on this issue. It is also necessary to conduct a dialogue with civil society in order to incorporate a citizen and user-centred perspective in work going forwards. It is naturally important that input and opinions have been received ahead of drawing up the OGP Action Plan, but it is at least as urgent, if not more so, to engage in an ongoing dialogue with civil society in order to pick up on its needs in practical work in the future.

The Government has developed and implemented a specific method for different forms of dialogue with civil society known as *sakråd*, i.e. a focussed discussion seeking to improve the Government’s underlying decision-making data and improve coordination between ministries in dialogue with civil society. The Government has also worked with civil society organisations to reach agreement on dialogue and consultation between the Government and civil society organisations at national level. The agreement operates under the name *Nationellt organ för dialog och samråd mellan regeringen och det civila samhället* (National body for dialogue and consultation between the Government and civil society) (NOD). NOD aims to solve problems together and supplement existing dialogue structures, including a formalised dialogue format with civil society called *Partsgemensamt forum* (Joint-party forum) (PGF). In PGF the dialogue itself is key. The intention is for the discussions to help to develop political work to improve conditions for civil society organisations so that they can give people a voice, provide services to their members and provide welfare services.

Twice per calendar year, the State is to invite participants to a relevant dialogue in such formalised focussed discussions to obtain civil society input on the opportunities and challenges of digitisation, especially linked to open data, innovation and collaboration. The dialogue meetings must be documented. A final report with results, a summary and lessons learned from the dialogues must be drawn up by the Ministry of Infrastructure.”

Editorial Note: For the complete text of this commitment, please see Sweden’s action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/09/Sweden_Action-Plan_2019-2021_EN.pdf

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Civic Participation
Potential impact:	Minor

Commitment Analysis

According to the action plan, Sweden still faces challenges regarding lack of public sector awareness of civil society’s needs regarding digitisation and open data, and there is limited collaboration on these areas. To address this issue, this commitment calls for holding two dialogues per calendar where civil society and government representatives discuss opportunities and challenges of digitisation, especially linked to open data, innovation, and collaboration. The meetings will be

documented, and the Ministry of Infrastructure will produce a final report with results, a summary, and lessons learned from the meetings. This commitment is relevant to the OGP value of civic participation due to the focus on improving civil society's participation in designing digitisation and open data policies.

The commitment specifically mentions that the "sagråd" and the "joint party forum" (PGF) formats for consultations will be used. The sakråd format for consulting civil society was developed and piloted during Sweden's third action plan (Commitment 4).¹ Sakråd aims to gather advice from expert CSOs on specific and sometimes highly technical or operational issues. The government also established the semi-public organisation NOD (National Organ for Dialogue).² According to the point of contact to OGP at the Ministry of Infrastructure, by using these established formats and the wide network that NOD possesses, this commitment aims to ensure structured consultations that add value to all parties.³ In this case, NOD acts as a link in finding appropriate CSOs, sending invitations, providing venues, arranging agenda, and acting as moderator. In addition, the commitment mentions the "joint-party forum" ("Partsgemensamt Forum"- PGF), which has existed since 2010. PGF is another mechanism that serves as a means for government and civil society to discuss civil society's role in strengthening democracy in Sweden.⁴

Ultimately, the potential impact of this commitment will largely depend on the extent to which the biannual dialogues improve collaboration between stakeholders in civil society and the government on Sweden's future digitisation efforts. It may also depend on the content in the Ministry of Infrastructure's final report on these dialogues, and if any concrete recommendations are included. However, given the limited scope of the commitment as envisioned in the action plan, the potential impact is assessed as minor. According to the point of contact, the dialogues will increase the digital maturity and awareness of ongoing policy processes among CSOs so that they can more effectively use established channels to monitor progress in the digital field.⁵

¹ OGP, IRM Sweden End-of-Term Report 2016-2018, p. 25, https://www.opengovpartnership.org/wp-content/uploads/2019/02/Sweden_End-Term_Report_2016-2018_EN.pdf

² NOD, <https://www.nodsverige.se/>

³ Sumbat Daniel Sarkis, point of contact to OGP, Ministry of Infrastructure, email correspondence with IRM, 25 September 2020.

⁴ PGF Forum 2017, <https://www.nodsverige.se/wp-content/uploads/2019/03/partsgemensamt-forum-2017.pdf>

⁵ Sumbat Daniel Sarkis, point of contact to OGP, Ministry of Infrastructure, email correspondence with IRM, 25 September 2020.

V. General Recommendations

This section aims to inform the 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 and, 2) an assessment of how the government responded to previous IRM key recommendations.

5.1 IRM Five Key Recommendations

Recommendations for the next action plan's development process	
1	Conduct formal and regular consultations with stakeholders to facilitate co-creation of future OGP commitments
2	Establish a multi-stakeholder forum to oversee the OGP process and create an online repository for all OGP-related information in Sweden

Conduct formal and regular consultations with stakeholders to facilitate co-creation of future OGP commitments

The development of Sweden's fourth action plan was carried out by a third party with minimal government or public involvement and oversight. The process largely consisted of a survey and interviews of stakeholders that were identified as relevant to digital governance and open data. However, there is no evidence that any additional opportunities existed for interested stakeholders to submit their own commitment proposals for inclusion in the action plan, or if there was any multi-stakeholder dialogue over the content of the action plan. Ultimately, the final commitments in the plan mainly consisted of pre-planned activities for the Agency for Digital Government (DIGG) and the Ministry of Infrastructure. For the next action plan, the IRM recommends holding formal consultations with stakeholders to facilitate more multi-stakeholder dialogue over the commitments and ensure greater levels of civil society engagement in the OGP process. The IRM recommends that the Ministry of Infrastructure take the initiative and oversee the co-creation process of future action plans, inviting relevant stakeholders from government and civil society to participate in consultation events. Surveys and interviews of stakeholders could supplement the co-creation process, but should not replace formal, regular, and open consultations.

Establish a multi-stakeholder forum to oversee the OGP process and create an online repository for all information related the OGP in Sweden

For the co-creation of the next action plan, and to ensure Sweden complies with OGP's updated Participation and Co-creation Standards,¹ the IRM recommends that Sweden establish a formal multi-stakeholder forum consisting of relevant government representatives and interested civil society stakeholders. Having a multi-stakeholder forum in place during the co-creation period could allow for greater dialogue between government and non-government stakeholders and facilitate greater engagement by civil society and wider co-ownership of future commitments. For example, the forum could help to develop a consultation strategy, raise awareness around Sweden's participation in OGP among civil society stakeholders, and proactively communicate information on the OGP process (such as the timeline, how to be involved, and feedback mechanisms). The government could work with Civic Tech Sweden, which has advocated for the creation of a "OGP council" of representatives from public agencies and civil society. According to a representative from Civic Tech Sweden, OGP remains largely unknown by civil society and the government in Sweden.² Having a formal multi-stakeholder forum in place during co-creation could allow civil society to push for the inclusion of more ambitious open government reforms in future OGP action plans.

Furthermore, to ensure greater transparency and comply with OGP's Participation and Co-creation Standards, the IRM recommends that Sweden create an online public repository for the OGP process.³ According to the point of contact to OGP, the Ministry of Infrastructure is currently developing an official government OGP webpage which will include a repository of relevant documents.⁴ The repository should be developed according to IRM guidance by including repository access to all documents and minutes of meetings related to Sweden's OGP process, including (but not limited to) consultation documents, action plans, government self-assessments, IRM reports, and supporting documentation of commitment implementation.⁵ The repository should also be updated regularly (at least every six months), and linked to evidence, particularly regarding the progress of the commitments in the action plan.

Recommendations for the next action plan's design	
1	Improve commitment design by including milestones with measurable outcomes and clear outputs
2	Take steps to develop a centralised portal for open data on public procurement, ensuring that data is available in open format
3	Take initial steps towards establishing an open register on lobbying

Improve commitment design by including milestones with measurable outcomes and clear outputs

For the next action plan, the IRM recommends providing more concrete milestones and measurable outcomes for the commitments. The commitments in the fourth action plan do not include concrete milestones, making it difficult to understand and assess their potential impact and level of ambition. Future commitments should (as best as possible) clearly articulate the intended outputs and added value that are expected within the action plan's timeframe, even when the commitments themselves are based on existing government activities. For example, Commitment 2 would have benefited from clearer descriptions of how priority datasets were identified and how the commitment would lead to tangible improvements to the open data portal (opendata.se). Similarly, the design of Commitment 3 would have benefited from a clearer articulation of the intended innovation activities related to the challenge.se platform. Better designed commitments could increase the likelihood of successful implementation and ensure potentially ambitious activities are recognised.

Take steps to develop a centralised portal for open data on public procurement, ensuring that data is available in open format

Sweden is currently the only country in Europe to not have a centralised register with data on public procurement tender and awards.⁶ Moreover, contracting authorities are not required by law to publish procurement notices and other documents at a central place. According to Open Knowledge Sweden and Transparency International, although public procurement in Sweden is generally considered efficient, transparent, and free from corruption, the absence of a central portal reduces the possibility for public scrutiny of how public funds are spent.⁷ For example, journalists often must submit freedom of information requests to obtain access to procurement-related documents and companies must often pay for a private service to receive alerts about the tenders that interest them.⁸

Moving forward, the IRM recommends using future OGP action plans to develop a centralised portal for high-quality contracting data that is timely, complete, and in a machine-readable format. Such activities could be done in collaboration with existing civil society initiatives aimed at improving the transparency of public procurement data. For example, Open Knowledge Sweden and Civic Tech Sweden have partnered with DIGG on a project

called the “Open Up!” that will develop an open source platform to make procurement easier, more transparent, and efficient.⁹ The platform will also contain a dashboard that visualises public procurement patterns and features that allow user-friendly analysis of the data, while the data will be published automatically on Sweden’s open data portal.

Finally, the IRM also recommends publishing procurement information in accordance with the Open Contracting Partnership’s Open Contracting Data Standard so that Sweden’s e-procurement system meets global formatting standards at each stage of the procurement cycle.¹⁰

Take initial steps towards establishing an open register on lobbying

Sweden’s political system is characterised by high levels of public trust and low corruption risks. However, as discussed in Section II of this report, there are no specific obligations for registration of lobbyists or reporting of contacts between public officials and lobbyists. Furthermore, Sweden does not currently publish datasets related to lobbying activities in the country.¹¹ Lobbying transparency has emerged as an important open government topic in Europe. For example, Finland committed to establish a lobbying register in its fourth OGP action plan,¹² and Latvia to conduct a public awareness campaign and will add the topic of lobbying transparency to public administration training for high-level public officials.¹³

Sweden could consider using future OGP action plans to take initial steps to develop an open register with information on interactions between lobbyists and government officials, ministers, and elected political representatives. This could involve conducting an in-depth assessment of lobbying activities in Sweden in collaboration with leading experts to better understand potential risks deriving from the lack of regulation and transparency in this policy area. A possible example of a similar preliminary activity is Finland’s assessment of the need for establishing a lobbying register, conducted during its second action plan. The subsequent comparative report on lobby register systems in selected countries helped inform Finland’s commitment in its fourth action plan to establish a lobbying register.¹⁴

5.2 Response to Previous IRM Key Recommendations

Previous IRM Report Key Recommendations

Recommendation		Did it inform the OGP Process?
1	The government should consult a more diverse range of CSOs, provide systematic and more concrete feedback to consultation participants, and commission external evaluations of its dialogue mechanisms.	X
2	The government should release more open data, monitor their use and effects, and aim to become one of the world leaders on open data.	✓
3	The Ministry of Finance should set concrete targets and indicators for the digitisation of the public sector and adopt a clear open data remit for the Digital First programme.	X
4	The Ministry of Finance should develop a formal and regular consultation mechanism to facilitate meaningful dialogue on the OGP commitments.	X

5	The government should improve the monitoring of progress on the Policy for Global Development (PGU) by developing related indicators, publishing concrete and measurable PGU action plans, and commissioning an external evaluation of PGU.	X
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Of the five Key Recommendations from the IRM's 2016-2017 Progress Report,¹⁵ one was incorporated into the fourth action plan. On the first recommendation, there is no evidence that a more diverse range of stakeholders were consulted compared to previous action plans, or if concrete feedback to stakeholders interviewed for the plan was provided. On the second recommendation, the fourth action plan includes commitments that aim to release priority datasets (Commitment 2) and propose a national open data strategy. For the third recommendation, although the fourth action plan includes commitments for digitisation of the public sector, they do not have concrete targets and the Digital First programme is not included. Lastly, the government did not establish a formal and regular consultation mechanism to facilitate the co-creation of the fourth action plan (fourth recommendation), and the action plan does not address the Policy for Global Development (fifth recommendation).

¹ OGP Participation & Co-Creation Standards, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>

² Pierre Mesure, Digidem Lab and Civic Tech Sweden, email correspondence with IRM, 17 September 2020.

³ OGP Participation & Co-Creation Standards, p. 7, https://www.opengovpartnership.org/wp-content/uploads/2019/07/OGP_Participation-Cocreation-Standards20170207.pdf

⁴ Sumbat Daniel Sarkis, point of contact to OGP, Ministry of Infrastructure, email correspondence with IRM, 25 September 2020.

⁵ IRM Guidance for Online Repositories, https://www.opengovpartnership.org/wp-content/uploads/2015/11/IRM_Guidance-for-Repositories_Updated_2020.pdf

⁶ Mihály Fazekas and Mara Mendes, "Recommendations for the Implementation of Open Public Procurement Data: An Implementer's Guide", Digiwhist, <https://opentender.eu/blog/2017-03-recommendations-for-implementation/>

⁷ Transparency International Latvia, Transparency International Lithuania, and Open Knowledge Sweden (2019), Open Data and Political Integrity in the Nordic Region, p. 52, https://delna.lv/wp-content/uploads/2019/11/NB7_OD4PI_Final_cmp.pdf

⁸ Disrupting public procurement with open data in Sweden, <https://medium.com/civictchsweden/disrupting-public-procurement-with-open-data-in-sweden-f8d774b0e5e5>

⁹ Open Procurement, New project to open up public procurement in Sweden, <https://openup.open-knowledge.se/blog/new-project/>

¹⁰ Open Contracting Data Standard: Documentation, <https://standard.open-contracting.org/latest/en/>

¹¹ Ibid.

¹² Open government National Action Plan for 2019-2023 Finland, 24 September 2019, p. 12, https://www.opengovpartnership.org/wp-content/uploads/2019/09/Finland_Action-Plan_2019-2023_EN.pdf

¹³ Fourth National Open Government Partnership Action Plan of Latvia 2020-2021, p. 17, https://www.opengovpartnership.org/wp-content/uploads/2020/01/Latvia_Action-Plan_2019-2021_EN.pdf

¹⁴ Ministry of Finance research report, https://vm.fi/en/article/-/asset_publisher/10616/selvitys-tarkasteli-lobbarirekisterin-kansainvalisia-esimerkkeja-rekisteroitava-tieto-toimivuuden-perusta

¹⁵ Independent Reporting Mechanism, Sweden Mid-Term Report 2016–2018, p. 49, https://www.opengovpartnership.org/wp-content/uploads/2018/10/Sweden_Mid-Term_Report_2016-2018_EN.pdf

VI. Methodology and Sources

IRM reports are written in collaboration with researchers for 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.

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 Sweden's OGP repositories (or online trackers), websites, 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 organizations.

Each IRM researcher conducts 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.¹

Interviews and stakeholder input

This report was written by IRM staff with support from the IEP. The emphasis of Sweden's fourth action plan on digital governance and open data informed the sources consulted for background information. These sources included:

- The Organisation for Economic Co-operation and Development (OECD)'s recent assessments of digital governance and data openness, usability, and re-usability in Sweden.
- Open Knowledge Sweden and the Transparency International chapters in Latvia (Delna) and Lithuania comparative report on open data and political integrity in the Nordic and Baltic regions.²
- Open Knowledge Sweden's and Delna's 2018 report on the availability of key anti-corruption datasets in Sweden.³
- The European Commission's Open Data Maturity Report.⁴

On the co-creation process for the fourth action plan, the IRM referred to the information provided in the final report prepared by the independent consultant (in Swedish) that formed the basis of the action plan's content.⁵

In addition, the IRM consulted with stakeholders involved in the implementation of Sweden's fourth action plan or involved in open government in Sweden more broadly. All exchanges of information between the IRM and stakeholders were carried out by email. These correspondences included:

- Angela Yong, Swedish Agency for Economic and Regional Growth, 14 September 2020.
- Pierre Mesure, Digidem Lab, Civic Tech Sweden, 17 September 2020.
- Kristine Ulander, Agency for Digital Government, 18 September 2020.

- Sumbat Daniel Sarkis, point of contact to OGP, Ministry of Infrastructure, 25 September 2020.
- David Boman, Swedish Cadastral and Land Registration Agency, 7 October 2020.
- Lars-Olof Hjärp, Swedish Transportation Administration, 20 October 2020.

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.

Current membership of the International Experts Panel is

- César Cruz-Rubio
- Mary Francoli
- Brendan Halloran
- Jeff Lovitt
- Juanita Olaya

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

² Transparency International Latvia, Transparency International Lithuania, and Open Knowledge Sweden (2019), Open Data and Political Integrity in the Nordic Region, https://delna.lv/wp-content/uploads/2019/11/NB7_OD4PI_Final_cmp.pdf

³ Transparency International Latvia, Open Knowledge Sweden (2019): Open data and the fight against corruption in Latvia, Sweden, and Finland: Sweden, https://delna.lv/wp-content/uploads/2018/11/OD4AC_SE_Final6.pdf

⁴ European Data Portal, Open Data Maturity Index 2019, https://www.europeandataportal.eu/sites/default/files/open_data_maturity_report_2019.pdf

⁵ The final report, in Swedish, https://www.regeringen.se/4ae89e/globalassets/regeringen/block/kontaktblock/infrastrukturdepartementet/pressekreterare/open-gov_civilsamhallet_v.2.pdf

Annex I. Commitment Indicators

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

Commitments should be appropriate to each country's 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: Do the written objectives and proposed actions lack sufficient clarity and specificity for their completion to be objectively verified through a subsequent assessment?
 - Specific enough to verify: Are the written objectives and proposed actions sufficiently clear and specific to allow for their completion to be objectively verified through a subsequent assessment?
- **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 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?
- **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 country's 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 country's IRM Implementation Report.

What makes a results-oriented commitment?

A results-oriented commitment has more potential to be ambitious and be implemented. It 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% 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 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.

These variables are assessed at the end of the action plan cycle in the country's IRM Implementation Report.

¹"Open Government Partnership: Articles of Governance" (OGP, 17 June 2019), <https://www.opengovpartnership.org/articles-of-governance/>

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