

# Independent Reporting Mechanism (IRM): Italy Transitional Results Report 2019–2021

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This report was prepared in collaboration with Federica Genna, Ecorys

## Table of Contents

<b>I. Introduction</b>	<b>2</b>
<b>II. Action Plan Implementation</b>	<b>3</b>
2.1. General highlights and results	3
2.2. COVID-19 pandemic impact on implementation	4
2.3. Early results	5
2.4. Commitment implementation	10
<b>III. Multistakeholder Process</b>	<b>23</b>
3.1. Multistakeholder process throughout action plan implementation	23
3.2. Overview of Italy's performance throughout action plan implementation	25
<b>IV. Methodology and Sources</b>	<b>29</b>
<b>Annex I. IRM Indicators</b>	<b>30</b>

## 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 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 progress and determine if efforts have impacted people's lives.

The IRM has partnered with Federica Genna (Ecorys) to carry out this evaluation. The IRM aims to inform ongoing dialogue around the 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 Italy's fourth action plan for 2019–2021. In 2021, the IRM implemented a new approach to its research process and the scope of its reporting on action plans, approved by the IRM Refresh.<sup>1</sup> The IRM adjusted its implementation reports for 2018–2020 action plans to fit the transition process to the new IRM products and enable the IRM to adjust its workflow in light of the COVID-19 pandemic's effects on OGP country processes.

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<sup>1</sup> For more information, see: <https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/>.

## II. Action Plan Implementation

The IRM transitional results report assesses the status of the action plan's commitments and the results from their implementation at the end of the action plan cycle. This report does not revisit the assessments for "verifiability," "relevance," or "potential impact." The IRM assesses those three indicators in IRM design reports. For more details on each indicator, please see Annex I in this report.

### 2.1. General highlights and results

Italy's 2019–2021 action plan contained 10 commitments with 58 clusters of milestones under the responsibility of different public institutions at national, regional, and local levels.<sup>2</sup> Some commitments addressed thematic areas from the previous action plan such as open data, access to information, fostering a culture of open government, providing digital services, and promoting digital citizenship. The Ministry of Education added seven more clusters of milestones to the action plan in August 2020 to include measures that respond to the COVID-19 pandemic.

Half of the commitments (5 out of 10) in the 2019–2021 action plan achieved substantial completion while the other half had limited completion. Compared to the previous action plan, fewer commitments were fully completed. However, it is noted that some commitments included fully completed groups of activities even if the commitment as a whole was not fully completed. This is because the complex design of the commitments included multiple groups of sometimes unrelated milestones from multiple public institutions. For example, Commitment 10 had overall limited completion, but the Department for Youth and National Community Service and Unioncamere fully completed the group of milestones for which they were responsible.

The response to the COVID-19 pandemic directly impacted some commitments' implementation (see Section 2.2). Also, uncertainty from changing government cabinets (and therefore changes in ministerial direction) delayed or halted implementation of many milestones under the responsibility of central public administrations.

The IRM design report recognized commitments on beneficial ownership transparency, public participation, and regulation of stakeholders (lobbying regulation) as being noteworthy. The commitments on beneficial ownership transparency and stakeholder regulation saw only limited completion and no change in opening government. Lengthy legislative processes for beneficial ownership transparency; weakened political interest in the Registry of Stakeholders commitment; two political turnovers in government during implementation; and the reprioritization of the public administration to respond to the COVID-19 pandemic were factors in limited and stalled commitment implementation. However, Commitment 4 on public participation saw major opening of government from the national public administration, as well as steps by local entities toward engaging citizens in decision-making processes. Commitment 4 is analyzed further in Section 2.3.

Further tangible results are found in other commitments' milestone clusters. Milestones 10.12–10.21 created a web platform to allow young people to apply online for Community Service. On its first day of operation, the platform received 4,271 requests for access and 787 completed applications. The Institute for Environmental Protection and Research also saw tangible results in access to information (Milestones 2.8–2.11). It launched a single, consolidated online form through which people can apply for access to documents and information, vastly simplifying a system that had multiple processes for requesting procedures from multiple subordinate agencies.

## 2.2. COVID-19 pandemic impact on implementation

After the first lockdown in March 2020, Italy began to gradually ease restrictions in May and restored freedom of movement in June 2020. In October 2020, the Italian government introduced restrictions on movement and social life due to the second wave of the pandemic, which were gradually eased in mid-2021. The two government cabinet turnovers were the main cause for the Italian multistakeholder forum not meeting regularly during the implementation period. However, reprioritizing the public administration (including the OGP Italy team) to respond to the pandemic was a contributing factor. Interaction picked up again between April and May 2021, when the new OGP Italy team was appointed following the establishment of the Draghi government.

Responding to the COVID-19 pandemic further delayed an already lengthy process for adopting beneficial ownership legislation, and directed political attention away from adopting measures to regulate lobbying. Also, the pandemic led meetings to move online, which was attributed as why some commitments were not completed fully. The pandemic's draw on resources means that creating linked open data on public investments will take another two years. The international implementation of the School of OpenCoesione was also not completed due to restrictions on freedom of assembly affecting Portugal. To encourage the completion of commitments beyond the scope of the implementation period, the government's self assessment report added 31 December as a final completion date for 29 milestones classified as "in progress".<sup>3</sup>

On the other hand, the Ministry of Education added five actions in Commitment 9 in response to the COVID-19 pandemic: to update students and schools about COVID-19 rules, support distance learning during the pandemic, promote the development of digital skills in education and adult education, and promote social awareness on cybersecurity and digital citizenship. The Ministry of Education also added milestones to Commitment 10 on training teaching staff about using online content and on teaching civic education.

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<sup>2</sup> Some commitments were very specific, while others were broad and included over 40 unrelated milestones from various institutions.

<sup>3</sup> Sabina Bellotti (DFP), Information provided to IRM during pre-publication period, 7 Feb. 2022

## 2.3. Early results

The IRM acknowledges that results may not be visible within the two-year time frame of the action plan and that at least a substantial level of completion is required to assess early results. For the purpose of the transitional results report, the IRM will use the “Did it Open Government?” (DIOG) indicator to highlight early results based on the changes to government practice in areas relevant to OGP values. Moving forward, new IRM results reports will not continue using DIOG as an indicator.

This section focuses on outcomes from implementing commitments that had an ambitious or strong design, per the IRM design report assessment, or that may have lacked clarity and/or ambition but had successful implementation with “major” or “outstanding” changes to government practice.<sup>4</sup> Commitments considered for analysis in this section had at least a “substantial” level of implementation, as assessed by the IRM in Section 2.4.<sup>5</sup> While Section 2.3 section analyzes the IRM’s findings for the commitments that meet the criteria described above, Section 2.4 includes an overview of the completion for all commitments in the action plan.

<b>Commitment 4: Support to participation</b>	
<p><b>Aim of the commitment</b></p>	<p>This commitment aimed to support public participation in policy making by promoting the use of public consultations across Italian public administrations, both at the national and the local level. National-level initiatives included drafting an Operational Handbook for Public Consultations, establishing a portal for accessing all public consultations by public administrations at all levels, and creating an open-source public consultation platform (to be available to public administrations at all levels). These initiatives sought to redress the existing fragmentation in the public participation landscape and contribute to institutionalizing public consultations.<sup>6</sup> The commitment also promoted the establishment of public consultation platforms at regional and municipal levels.</p> <p>The commitment is structured around five different sets of milestones, led by: the Department of Public Function (PCM-DFP) and the Department of Institutional Relations (PCM-DRI) for 4.1–4.4; the Ministry of Health for 4.5; the Regions and Autonomous Provinces for 4.6–4.7; the City of Milan for 4.8–4.12; and the City of Rome for 4.13–4.15.<sup>7</sup></p>
<p><b>Did it open government?</b></p> <p><b>Major</b></p>	<p><b>PCM-DFP, PCM-DRI, Ministry of Health</b></p> <p>Three out of the four national initiatives under the first cluster of milestones in this commitment were completed. Both the portal for accessing government-sponsored public consultations, <a href="https://www.consultazione.gov.it">Consultazione.gov.it</a>,<sup>8</sup> and the open-source public consultation platform, <a href="https://partecipa.gov.it">Partecipa.gov.it</a>,<sup>9</sup> were launched in December 2019 (4.2 and 4.4). As of December 2021, the <a href="https://www.consultazione.gov.it">Consultazione.gov</a> portal lists 129 public consultations.<sup>10</sup> Users can find consultation processes by filtering by consultation theme, type, modality, and status.<sup>11</sup> The open source platform, <a href="https://partecipa.gov.it">Partecipa.gov</a>, has hosted 16 public consultations, each with an average of roughly 350 participants and 142 followers.<sup>12</sup> In July 2020, the open source software catalogue on <a href="https://developersitalia.com">Developers Italia</a> published the software code for the platform,<sup>13</sup> making it available and free to all public administrations and other entities.<sup>14</sup></p> <p>The <a href="https://partecipa.gov.it">Partecipa.gov</a> platform has also been used by the Ministry of Health to collect and publish best practices for sustainable development initiatives that</p>

impact health (4.5); and the DFP and DRI to conduct a public consultation on the Operational Handbook (4.1) between December 2019 and March 2020.<sup>15</sup> The Ministry of Health’s consultation targeted both public administrations and the general public via four separate questionnaires (two per category). Seventy-nine responses were received from public administration representatives, and 168 from the general public.<sup>16</sup> The information collected is expected to feed into the development of a best-practices exchange platform (“Sustainability in Health”). The platform is not yet available.

Ninety-three comments were received during the public consultation for the Operational Handbook (4.1).<sup>17</sup> According to the consultation report, most of these comments were either fully incorporated in the draft (49.4%) or partially incorporated (18.07%).<sup>18</sup> A comparison between the previous guidelines<sup>19</sup> and the current draft of the handbook<sup>20</sup> confirms that the handbook is a step forward, as it provides practical advice for implementing public consultations. The handbook includes a detailed checklist for implementing public consultations and is based on international best practices,<sup>21</sup> including the need for inclusive, accessible, and transparent processes.<sup>22</sup> However, despite the consultation’s end in March 2020, the handbook’s publication has been delayed due to several constraints including internal staff turnover and the COVID-19 pandemic.<sup>23</sup>

Overall, the current implementation of the milestones under the responsibility of PCM-DRI (4.1–4.4) represents a major change in government practice regarding civic participation. The Partecipa.gov and Consultazione.gov websites are novel; representatives from both the government and civil society confirmed that these initiatives have strengthened civic participation in Italy.<sup>24</sup> Public administrations are now better equipped to implement digital civic participation processes, and the creation of the websites as single access points for consultations redress the previously fragmented participation landscape in Italy.<sup>25</sup> A DRI representative further explained that, although Partecipa.gov is mainly used by central public administrations, there is increasing use by local administrations.<sup>26</sup> Public consultations have been held on important topics of high public interest such as transparency and anticorruption,<sup>27</sup> remote working arrangements,<sup>28</sup> and ways to simplify public administration working methods and services.<sup>29</sup>

Furthermore, each completed consultation is accompanied by a report that analyzes the quantity and quality of the comments received. The reports indicate whether and how the public’s suggestions have been taken up by the responsible public administration,<sup>30</sup> thus evidencing tangible results of the consultations. This is a step forward as previous consultations were not always accompanied by result reports.<sup>31</sup>

### **Regions and Autonomous Provinces**

The region of Emilia Romagna completed milestones to establish and promote a participation platform (4.6 and 4.7). The initiatives undertaken by the City of Milan (4.8–4.12) and the City of Rome (4.13–4.15), explained below, also are good examples of local entities improving their engagement with citizens in decision-making.<sup>32</sup>

### **City of Milan**

The cluster of milestones under the responsibility of the City of Milan (4.8–4.12) sought to develop and implement an open-source participation platform and a consultation platform for online contributions to the Government Territorial Plan of Milan (4.8–4.11). It also aimed to restructure

	<p>the registers of associations and active citizenship into a single digital tool for registration and access to information on existing local organizations (4.12).<sup>33</sup> Both initiatives were fully implemented. The City of Milan launched the platform Milano Partecipa<sup>34</sup> in late 2020. It is currently the official institutional tool for civic participation and therefore gives binding requirements for administrations.<sup>35</sup> It differs from the preexisting civic engagement platform, partecipaMI,<sup>36</sup> which is managed by the CSO Fondazione RCM (Rete Civica di Milano) and is more of a forum for exchanging opinions among the general public.<sup>37</sup> The software is also different<sup>38</sup> and there are no plans to join the two platforms. The creation and launch of Milano Partecipa is a major change toward opening this local government.</p> <p>The 2019 creation of a platform for online contributions to the Government Territorial Plan of Milan<sup>39</sup> is a novel way to approach public consultations for this kind of strategic plan.<sup>40</sup> The consultation was accessible by both users registered with the Milan municipality portal as well as any citizen with a digital identification on SPID (Italy’s public digital identity system).<sup>41</sup> Citizens could also provide comments via email or on paper by visiting a relevant municipal office.<sup>42</sup></p> <p>The reorganization of association and active citizenship registers (4.12) was launched in December 2019.<sup>43</sup> It is a step forward in access to information as the register used to be only available in PDF format, and organizations wishing to register had to do so through a separate online form.<sup>44</sup></p> <p><b>City of Rome</b></p> <p>The milestones under the responsibility of the City of Rome (4.13–4.15) aimed to draft regulations for the new participation tools discussed in the Statute of the City of Rome (4.13), the systematization of these tools (4.14), and pilot e-voting using blockchain technology (4.15). This latter initiative was not implemented due to the excessive administrative costs.<sup>45</sup> Although these milestones are part of a broader existing city strategy that goes beyond the OGP framework,<sup>46</sup> the IRM acknowledges the steps taken by the city. As indicated by a city representative,<sup>47</sup> the Statute of the City of Rome was amended<sup>48</sup> in October 2020 and January 2021 to expand existing provisions for civic participation. These amendments will lead to changing the institutional web portal for civic participation with a view to providing adequate platforms for digital civic engagement.<sup>49</sup> The institutional portal for civic participation was further updated in June 2021 to include additional information on ongoing participation processes.<sup>50</sup></p> <p>For the national and local governments, the IRM notes that the lack of outreach and awareness raising about the new participation tools might mean that consultation participants thus far are a small segment of the population and not fully representative. This can lead to a significant bias in the input received. To avoid this risk, and to build upon results so far, the fifth action plan could commit to train public administrations. Trainings could include information on the national platforms and communication strategies to raise awareness among public administrations and citizens to foster civic participation.<sup>51</sup></p>
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<sup>4</sup> IRM design reports identified strong commitments as “noteworthy” if they were assessed as verifiable, relevant, and had transformative potential impact. If no commitments met the potential impact threshold, the IRM selected noteworthy commitments from the commitments with “moderate” potential impact. For a list of Italy’s noteworthy commitments, see

the Executive Summary of the 2019–2021 IRM design report: <https://www.opengovpartnership.org/documents/italy-design-report-2019-2021/>.

<sup>5</sup> The following commitments assessed as noteworthy in Italy's IRM design report are not included in this section because their limited implementation did not provide enough progress to assess results: Commitment 3: Register of Beneficial Owners; and Commitment 5: Regulation of Stakeholders.

<sup>6</sup> Federica Genna, *Independent Reporting Mechanism (IRM): Italy Design Report 2019–2021* (OGP, 16 Nov. 2020), 43, <https://www.opengovpartnership.org/documents/italy-design-report-2019-2021/>.

<sup>7</sup> For further details, see Ministry for Public Administration, *4<sup>th</sup> National Action Plan for Open Government 2019–2021* (OGP, 15 Jul. 2019), 44–45, <https://www.opengovpartnership.org/documents/italy-action-plan-2019-2021/>.

<sup>8</sup> Available at: <http://www.consultazione.gov.it/it/>.

<sup>9</sup> Available at: <https://partecipa.gov.it/?locale=en>.

<sup>10</sup> Of the 129 public consultations, 92 were sponsored by central administrations and 37 by local or regional authorities.

<sup>11</sup> “Type” includes: open to some; open to all; and upon request. “Modality” includes physical or online. “Status” includes: upcoming; ongoing; closed and results being analyzed; and closed with a published consultation report.

<sup>12</sup> This calculation is based on the available statistics presented for each consultation on the portal.

<sup>13</sup> Available at: <https://developers.italia.it/it/software/pcm-dipartimentofunzionepubblica-partecipa.html>.

<sup>14</sup> Ministry for Public Administration and Italia Open Gov., *Allegato 1 Azioni ed impegni specifici del 4 NAP* [Attachment 1 Actions and specific commitments of the 4 NAP], (Feb. 2022), <https://open.gov.it/rapporti-quarto-nap/>; Ministry for Public Administration, *4<sup>th</sup> National Action Plan for Open Government 2019–2021*, 29.

<sup>15</sup> *Id.*

<sup>16</sup> Dept. of Public Function, *Report Consultazione pubblica “SoStenibilità in Salute”* [Report Public consultation “Sustainability in Health”] (Nov. 2020),

[https://partecipa.gov.it/uploads/decidim/attachment/file/9/Report\\_SoStenibilitaSalute\\_ver20201124.pdf](https://partecipa.gov.it/uploads/decidim/attachment/file/9/Report_SoStenibilitaSalute_ver20201124.pdf).

<sup>17</sup> Dept. of Public Function and Dept. for Institutional Reforms, *Report Consultazione pubblica “Commenta le Linee Guida sulla consultazione”* [Report Public consultation “Comment on the Consultation Guidelines”] (Jun. 2020),

[https://partecipa.gov.it/uploads/decidim/attachment/file/5/ReportConsultazLineeGuida\\_DEF.pdf](https://partecipa.gov.it/uploads/decidim/attachment/file/5/ReportConsultazLineeGuida_DEF.pdf).

<sup>18</sup> *Id.*

<sup>19</sup> In 2017, the Ministry of Public Administration developed and published a ten-page guideline on general public consultation principles inspired by international best practices. Dept. of Public Function, “Linee guida sulla consultazione pubblica in Italia.” [Guidelines on public consultation in Italy.] Directive n. 2/2017 (17A04797) GU Serie Generale n.163 del 14-07-2017 (Official Gazette of the Republic of Italy, 31 May 2017), <https://www.gazzettaufficiale.it/eli/id/2017/07/14/17A04797/sg>. The guidelines did not provide clear instruction for the practical implementation of consultations, which is what the handbook intends to do. Representative of the DFP, interview by IRM researcher, 11 May 2020.

<sup>20</sup> Available at:

[https://partecipa.gov.it/uploads/decidim/attachment/file/1/Linee\\_guida\\_consultazione\\_Bozza\\_per\\_la\\_consultazione\\_5dic2019.pdf](https://partecipa.gov.it/uploads/decidim/attachment/file/1/Linee_guida_consultazione_Bozza_per_la_consultazione_5dic2019.pdf).

<sup>21</sup> E.g., OECD, *Citizens as Partners: OECD Handbook on Information, Consultation and Public Participation in Policy-Making* (OECD Publishing, 2001), <https://www.oecd-ilibrary.org/docserver/9789264195578-en.pdf?expires=1598260790&id=id&accname=guest&checksum=5D06082204D743E9139518BECC647BD5>; and European Commission, “Chapter VII Guidelines on Stakeholder Consultation” (accessed Feb. 2022) (<https://ec.europa.eu/info/sites/default/files/better-regulation-guidelines-stakeholder-consultation.pdf>).

<sup>22</sup> Genna, *Independent Reporting Mechanism (IRM): Italy Design Report 2019–2021*, 44.

<sup>23</sup> Representative of DRI, interview by IRM researcher, 10 Nov. 2021.

<sup>24</sup> *Id.*; Representative of DFP, interview by IRM researcher, 23 Nov. 2021; Ilaria Vitellio (former MappiNA representative and current consultant for Formez PA for the OpenGov project), interview by IRM researcher, 15 Nov. 2021.

<sup>25</sup> *Id.*

<sup>26</sup> Representative of DRI, interview by IRM researcher, 10 Nov. 2021.

<sup>27</sup> ParteciPa, “Consultazione pubblica su Trasparenza e Anti-Corruzione” [Public Consultation on Transparency and Anti-Corruption] (3 Dec. 2019), <https://partecipa.gov.it/processes/anticorruzione>.

<sup>28</sup> ParteciPa, “Il lavoro agile tra presente e future” [Agile work between present and future] (5 Jun. 2020), <https://partecipa.gov.it/processes/lavoroagile>.

<sup>29</sup> ParteciPa, “The voice of citizens for a simpler PA” [La voce dei cittadini per una PA più semplice] (28 Jun. 2021), <https://partecipa.gov.it/processes/semplificazione-cittadini>; ParteciPa, “La voce delle imprese per una PA più semplice” [The voice of companies for a simpler PA] (28 Jun. 2021), <https://partecipa.gov.it/processes/semplificazione-imprese>.

<sup>30</sup> See Office for Simplification and Bureaucracy, *Semplifichiamo! Esiti Della Consultazione Pubblica* [Let's Simplify: The results of the public consultation] (29 Jun. 2020), [https://partecipa.gov.it/uploads/decidim/attachment/file/6/Semplifichiamo\\_Report\\_29giugno2020\\_DEF.pdf](https://partecipa.gov.it/uploads/decidim/attachment/file/6/Semplifichiamo_Report_29giugno2020_DEF.pdf). Inter alia, the report states that a real-time analysis of the comments led to regulatory proposals that addressed urgent priorities identified during the consultation (page 7). For example, incorporating the “once only” principle in art. 264 of the decree on accessing state funds to finance businesses following the pandemic. This principle states that the administration may only ask for applicants' documents if the association doesn't already have them. See also Dept. of Public Function and Dept. for Institutional Reforms, *Report Consultazione pubblica “Aiutaci a costruire ParteciPa”* [Public consultation “Help us build ParteciPa”] (ParteciPa, Jun. 2020),

[https://partecipa.gov.it/uploads/decidim/attachment/file/4/Report\\_ConsultPartecipa\\_DEF.pdf](https://partecipa.gov.it/uploads/decidim/attachment/file/4/Report_ConsultPartecipa_DEF.pdf). On page seven, this report summarizes how the comments from the public consultation fed the development of the ParteciPa platform. For example, this includes enabling access to the platform via Italy's public digital identity system (SPID) and adjusting the platform's layout to follow the Public Administration's design guidelines (available at: <https://docs.italia.it/italia/designers-italia/design->



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[linee-guida-docs/it/stabile/index.html](#)). The report further mentions that other suggestions received will be taken into account when discussing technical updates to the platform in the future.

<sup>31</sup> Impact Assessment Office, *Le Consultazioni Dei Cittadini E Dei Portatori Di Interesse ESPERIENZE N. 27* [Consultations of citizens and porters of interest, Experience n. 27] (Senate of the Republic of Italy, Mar. 2017),

[https://www.senato.it/application/xmanager/projects/leg18/file/repository/UVI/27\\_CONSULTAZIONI\\_PUBBLICHE.pdf](https://www.senato.it/application/xmanager/projects/leg18/file/repository/UVI/27_CONSULTAZIONI_PUBBLICHE.pdf).

<sup>32</sup> Vitellio, interview; Representatives of the Dept. of Participation, Communication and Equal Opportunities (City of Rome), response to IRM researcher's questionnaire, 22 Nov. 2021.

<sup>33</sup> Genna, *Independent Reporting Mechanism (IRM): Italy Design Report 2019–2021*, 45–46.

<sup>34</sup> City of Milan, "Milano Partecipa" [Milan Participates] (accessed Feb. 2022),

<https://partecipazione.comune.milano.it/pages/milanopartecipa-presentazione>.

<sup>35</sup> Representative of the City of Milan, email to IRM researcher, 10 Dec. 2021.

<sup>36</sup> Partecipami.it, "Vuoi Fare Una Segnalazione, Dialogare Con I Cittadini O Con Gli Amministratori Comunali? Scegli Lo Spazio Giusto" [Do You Want To Make A Report, Dialogue With Citizens Or With Municipal Administrators? Choose The Right Space] (accessed Feb. 2022), <https://www.partecipami.it/>.

<sup>37</sup> RCM Foundation, "Chi siamo" [Who we are] (accessed Feb. 2022), <https://www.fondazionercm.it/chisiamo/>.

<sup>38</sup> PartecipaMI is based on the OpenDCN platform. Milano Partecipa is based on the open-source Decidim software.

<sup>39</sup> City of Milan, "Milano 2030 - Pgt Vigente" [Milan 2030 - Pgt In Force] (accessed Feb. 2022),

<https://www.pgt.comune.milano.it>.

<sup>40</sup> For further details on the status quo at the time of writing the fourth action plan, see: Italy's 2019–2021 design report, p. 46 (<https://www.opengovpartnership.org/documents/italy-design-report-2019-2021/>).

<sup>41</sup> City of Milan, "Urbanistica AI via le osservazioni al Pgt, per la prima volta anche online" [Urban planning. Observations at the Pgt start, for the first time also online] (15 Jun. 2019), <https://www.comune.milano.it/-/urbanistica.-al-via-le-osservazioni-al-gt-per-la-prima-volta-anche-online>.

<sup>42</sup> *Id.*

<sup>43</sup> City of Milan, "Iscrizione al Registro delle Associazioni e Albo dei Comitati e Gruppi informali" [Registration in the Register of Associations and Register of Committees and Informal Groups] (accessed Feb. 2022),

<https://www.comune.milano.it/servizi/iscrizione-al-registro-delle-associazioni>.

<sup>44</sup> Genna, *Independent Reporting Mechanism (IRM): Italy Design Report 2019–2021*, 46.

<sup>45</sup> Ministry for Public Administration and Italia Open Gov., *Allegato 1 Azioni ed impegni specifici del 4 NAP*.

<sup>46</sup> Genna, *Independent Reporting Mechanism (IRM): Italy Design Report 2019–2021*, 46.

<sup>47</sup> Representatives of the Dept. of Participation, Communication and Equal Opportunities (City of Rome), response to IRM researcher's questionnaire.

<sup>48</sup> City of Rome, "Deliberazione N. 126 Estratto Dal Verbale Delle Deliberazioni Dell'assemblea Capitolina" [Resolution No. 126 Extract From The Minutes Of The Resolutions Of The Capitoline Assembly] (27 Oct. 2020),

[https://www.comune.roma.it/web-resources/cms/documents/Delibera\\_Assemblea\\_Capitolina\\_n.126\\_del\\_27\\_ottobre\\_2020.pdf](https://www.comune.roma.it/web-resources/cms/documents/Delibera_Assemblea_Capitolina_n.126_del_27_ottobre_2020.pdf)

[22\\_9\\_2021.pdf](https://www.comune.roma.it/web-resources/cms/documents/Delibera_Assemblea_Capitolina_n.126_del_27_ottobre_2020.pdf); City of Rome, "Deliberazione n. 127 Estratto Dal Verbale Delle Deliberazioni Dell'assemblea Capitolina" [Resolution n. 127 Extract From The Minutes Of The Resolutions Of The Capitoline Assembly] (27 Oct. 2020), [https://www.comune.roma.it/web-resources/cms/documents/Delibera\\_Assemblea\\_Capitolina\\_n.127\\_del\\_27\\_ottobre\\_2020.pdf](https://www.comune.roma.it/web-resources/cms/documents/Delibera_Assemblea_Capitolina_n.127_del_27_ottobre_2020.pdf)

[22\\_9\\_2021.pdf](https://www.comune.roma.it/web-resources/cms/documents/Delibera_Assemblea_Capitolina_n.127_del_27_ottobre_2020.pdf); City of Rome, "Deliberazione n. 3 Estratto Dal Verbale Delle Deliberazioni Dell'assemblea Capitolina" [Resolution No. 3 Extract From The Minutes Of The Resolutions Of The Capitoline Assembly] (15 Jun. 2021), [https://www.comune.roma.it/web-resources/cms/documents/Delibera\\_Assemblea\\_Capitolina\\_n.3\\_del\\_15\\_gennaio\\_2021.pdf](https://www.comune.roma.it/web-resources/cms/documents/Delibera_Assemblea_Capitolina_n.3_del_15_gennaio_2021.pdf)

[22\\_9\\_2021.pdf](https://www.comune.roma.it/web-resources/cms/documents/Delibera_Assemblea_Capitolina_n.3_del_15_gennaio_2021.pdf).

<sup>49</sup> Representatives of the Dept. of Participation, Communication and Equal Opportunities (City of Rome), response to IRM researcher's questionnaire.

<sup>50</sup> *Id.*

<sup>51</sup> Representative of DRI, interview by IRM researcher, 10 Nov. 2021; Representative of DFP, interview by IRM researcher, 23 Nov. 2021; Ilaria Vitellio (former MappiNA representative and current consultant for Formez PA for the OpenGov project), interview by IRM researcher, 15 Nov. 2021.

## 2.4. Commitment implementation

The table below includes an assessment of the level of completion for each commitment in the action plan.

<b>Commitment</b>	<b>Completion:</b> <i>(no evidence available, not started, limited, substantial, or complete)</i>
<b>1. Open Data</b>	<p><b>Limited</b></p> <p>Milestones 1.1 and 1.2 (PCM-DFP, AgID): The self-assessment states that these milestones to create guidelines were not implemented. Article 34 of Legislative Decree 76/2020<sup>52</sup> called for the development of a National Data Strategy, which would have voided the relevance of any guidelines, was developed during this action plan period.<sup>53</sup></p> <p>Milestones 1.3–1.7 (AgID): These were not completed. According to the self-assessment, the implementation of these activities was superseded by similar activities contained in the national ICT Plan 2020–2022. The self-assessment states that while now more datasets are available generally, Milestone 1.7 (publish datasets under this group of activities) was carried over to the ICT Plan 2020–2022.<sup>54</sup></p> <p>Milestones 1.8–1.11 (AgID, Digital Team): The self-assessment states that the first activity (identify high-value datasets) was not completed and therefore the rest of the activities were not completed. The self-assessment reports two data models were implemented: the federated, national infrastructure information system (SINFI) and the Public Energy Living Lab – Public Lighting (PELLIP).</p> <p>Milestones 1.12–1.14 (ISTAT)<sup>55</sup>: A map of risks in Italian municipalities was launched in 2019, before the action plan, but there have not been yearly updates as the website’s latest data is dated 30 June 2018.<sup>56</sup> The self-assessment states that georeferenced and territorial open analysis tools were developed but yet published through an API. It also states that the delayed redesign of datiopen.istat.it has blocked completion in publishing information to improve interoperability.<sup>57</sup> The milestones will be carried over past 2021.</p> <p>Milestones 1.15 and 1.16 (MIBAC)<sup>58</sup>: The platform for libraries and cultural institutes (Alphabeta.it) has yet to go live as of December 2021, although the platform and its functions were presented in July 2021.<sup>59</sup></p> <p>Milestone 1.17 (PCM-DCI): This milestone was not completed as expected. Legislation to establish a national archive of buildings was not implemented. Instead, the PCM-DCI developed a platform with a centralized database describing the interventions to reduce seismic risks.</p> <p>Milestones 1.18–1.20 (PCM-DIPE): These milestones were completed. The self-assessment reports that over the implementation period, information was made available on new datasets (e.g., COVID-19)<sup>60</sup> and there were multiple promotions including an OGP</p>

<p>exchange with the World Bank and South Africa.<sup>61</sup> The self-assessment also reports published updates to the OpenCUP portal.<sup>62</sup></p> <p>Milestones 1.21–1.24 (PCM, DPCoE,<sup>63</sup> and NUVAP<sup>64</sup>): The COVID-19 pandemic delayed implementing the milestone on linking open data on public investments, which the self-assessment says will take another two years to complete. Although it is uncertain when the EU Corner section of the website was published or last updated,<sup>65</sup> it is available with information on the 2014–2020 European Structural and Investment Fund cycle and contains links to specific datasets and other useful information for consulting EU data.<sup>66</sup> The self-assessment reports completion of Milestone 1.23 through the publication of various gender related datasets.<sup>67</sup> The ‘School of openCoesione’ operated successfully in Bulgaria, Croatia, Spain, and Greece (as outlined in the milestone), but the pandemic negatively affected its completion in Portugal.<sup>68</sup></p> <p>Milestones 1.25–1.33 (PCM, DPCoE, NUVAP, and ANBSC)<sup>69</sup>: The milestone to develop a single platform for confiscated property is expected to be completed after the end of the implementation period. At the end of 2019, PCM-DIPE published information on using the tag for confiscated property in the CUP Index System.<sup>70</sup> The government did not finish integrating the General Inspectorate for Financial Relations with the European Union monitoring protocol to identify confiscated property data in the Single Monitoring System of EU cohesion policies. However, the tags in the CUP system can be accessed through the Single Monitoring System according to the self-assessment.<sup>71</sup> The Ministry of the Interior created a freely accessible confiscated-companies portal (with open data in JSON for Linked Data format) that allows the extraction of information relating to companies confiscated from organized crime.<sup>72</sup> The inclusion of statistics on confiscated property in the National Statistical System was delayed due to COVID-19 according to the self-assessment. The OpenCoesione website contains a section focused on projects funded by cohesion policies to exploit confiscated property which are downloadable in bulk in CVS format.<sup>73</sup> The government and the University of Turin produced the first national report on the transparency of municipal administrations in relation to confiscated property,<sup>74</sup> and the self-assessment has links to three stories about reusing confiscated property data, including one about violence against women.<sup>75</sup> Activities launching co-creation labs in two territories are ongoing after the end of the implementation period.<sup>76</sup></p> <p>Milestone 1.34 (Unioncamere): Unioncamere published 823 datasets (seeing over 100,000 downloads according to the self assessment) during the implementation period from 16 regional and local chambers of commerce in Italy.<sup>77</sup> Most datasets are in CSV format, but some are in XLSX and ODS formats.<sup>78</sup></p> <p>Milestones 1.35–1.41 (Regional Administrations, City of Milan): The self-assessment reports only the region of Emilia-Romagna as having defined a group of datasets (1.35) as well as trained public officials on promoting and using the datasets (1.38).<sup>79</sup> According to the self-assessment, there was a participatory process for defining datasets (1.36) although there is no evidence of this, and it instead points to a contact form for requesting datasets as part of the participatory process. Evaluation indicators under Milestone 1.37 were not created. The City of Milan launched its open data portal<sup>80</sup></p>
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	<p>and has developed, but not yet published, a section with indicators and actions taken in 16 areas (such as tourism, culture, participation, housing, transport, etc.). By the end of the implementation period, there was no collaboration with Milan universities to use the data in open data labs but there are agreements due to be signed in September 2021.<sup>81</sup></p>
<p><b>2. Transparency</b></p>	<p><b>Substantial</b></p> <p>Milestones 2.1–2.4 (PCM-DFP): According to the self-assessment, the government did not finish developing an online ‘wizard’ to aid freedom of information (FOI) requesters, and the FOI monitoring system was not completed due to the slow uptake of a voluntary standardized register by institutions.<sup>82</sup> Monitoring is currently conducted through an annual survey of institutions.<sup>83</sup> According to the self-assessment, the government adapted the activities of Milestones 2.3 and 2.4 (simplifying proactive transparency measures on government websites) into the work of a commission looking to streamline the administrative burdens of anticorruption and transparency legislation. There was a public consultation to inform the work of the commission<sup>84</sup> and legislative reforms were included in the National Recovery and Resilience Plan.<sup>85</sup> The reforms have yet to be implemented.</p> <p>Milestones 2.5 and 2.6 (CONSIP): Milestone 2.5 was complete before the action plan started.<sup>86</sup> The self-assessment states that the map on supplier performance, available via the CONSIP website,<sup>87</sup> was launched in May 2020 and is updated quarterly.</p> <p>Milestone 2.7 (INAIL): An online, searchable access register is available on the INAIL website.<sup>88</sup> The data can be filtered by location, document type, date range, and can be downloaded as an html file.</p> <p>Milestones 2.8–2.11 (ISPRA): The National System for Environmental Protection (SNPA) website contains a section explaining Italy’s different access to information regimes.<sup>89</sup> It is possible to make a request through any regime for any of the SNPA entities using a single online form.<sup>90</sup> Registers for individual entities can be accessed and downloaded in XLS format but summary tables of all entities are only available as an image on the SNPA website.<sup>91</sup></p> <p>Milestones 2.12–2.17 (City of Milan, City of Rome): The City of Milan integrated its update of transparency and participation regulations into the three-year plan for the prevention of corruption and transparency.<sup>92</sup> The self-assessment states that Milan completed internal testing of the draft access register and development of advanced solutions for consulting the Official Noticeboard; however, these are not yet public.<sup>93</sup> The functions of the proposed Milan@Work app are due to be integrated into the pre-existing Citizen’s File app.<sup>94</sup> The City of Rome has updated its website in accordance with its 2019 legislation on the single regulation of accesses.<sup>95</sup> The City of Rome publishes its access register as a downloadable PDF file of the last six months of requests.<sup>96</sup></p>
<p><b>3. Register of beneficial owners</b></p>	<p><b>Limited</b></p>

	<p>Milestones 3.1–3.5 (MISE,<sup>97</sup> MEF,<sup>98</sup> Unioncamere): This commitment sought to develop and implement a register of beneficial ownership.</p> <p>The fifth EU anti-money laundering directive (5AMLD) was officially transposed to the Italian legislative system in October 2019 with Legislative Decree 125/2019.<sup>99</sup> Between December 2019 and February 2020, the Ministry of Economics and Finance (MEF) held a public consultation<sup>100</sup> on the text of the draft decree,<sup>101</sup> which outlined the characteristics of the proposed register. Civil society organizations made several recommendations stressing the importance of ensuring the register is accessible for free by all public administrations and, eventually, by the general public—two elements which were not foreseen by the draft.<sup>102</sup></p> <p>Several public bodies, including the Council of State, examined the draft decree as part of the legislative approval process.<sup>103</sup> The Council strongly criticized<sup>104</sup> several elements of the drafting process as well as the draft’s content.<sup>105</sup> Its opinion has effectively halted the process for creating the register. The MEF has been asked to provide a reasoned response to the Council’s criticism and to revisit the draft decree. This revision is ongoing and is expected to be finalized by 31 December 2021.<sup>106</sup></p> <p>The transposed 5AMLD is the only milestone completed as part of this commitment, as the other milestones are ongoing.<sup>107</sup> A representative of Transparency International Italy<sup>108</sup> confirmed that the process has stalled since the Council of State’s opinion, and it remains unclear if or how the text is being revised. She confirmed that, according to Unioncamere (who is responsible for hosting the register), the technical structure is ready, but its launch remains dependent on the approval of the draft decree.</p>
<p><b>4. Support of stakeholders</b></p>	<p><b>Substantial</b></p> <p>For details regarding the implementation and early results of this commitment, see Section 2.3.</p>
<p><b>5. Regulation of stakeholders</b></p>	<p><b>Limited</b></p> <p>Milestones 5.1–5.4 (MISE, PCM-DFP, MATTM, MIPAAFT): Government and civil society representatives confirmed completion of Milestone 5.1 (establishing a working group to identify a shared solution for the register of stakeholders). However, both political turnover and the pandemic’s shifting of meetings online stalled the process and limited engagement.<sup>109</sup> Some steps were taken on Milestone 5.2 to update the platform used by MISE for its transparency register so that it could consolidate registers from different public administrations.<sup>110</sup> A MISE representative stressed that stronger political interest and coordination efforts at decision-making levels—which remained limited during implementation of the fourth action plan—would be instrumental for implementing this commitment.<sup>111</sup> Milestones 5.3 and 5.4 are not completed.</p> <p>Both government and CSO representatives have stressed the importance of carrying this commitment forward into the fifth action plan,<sup>112</sup> with a view to ensuring transparency among stakeholders implementing the Resilience and Recovery Plan.<sup>113</sup></p> <p>A civil society representative expressed concern that steps backward were occurring in the area of transparency in decision-making. He</p>

	<p>explained that the Ministry for Ecological Transition (MiTE),<sup>114</sup> one of the public administrations responsible for implementing these milestones, used to have a public agenda of meeting with stakeholders. In April 2021, an investigation from the Italian Data Protection Authority<sup>115</sup> highlighted a series of concerns related to the online publication of personal data and requested that the Register be amended within 30 days. Instead, the section including the meeting agendas was moved to a less visible spot on the MiTE website and has not been updated since May 2021.<sup>116</sup></p> <p>Milestones 5.5–5.7 (City of Rome): The City of Rome has not created a register associated with adopting Open Agendas (5.6), nor tested or implemented regular communication mechanisms with stakeholders to lay the foundation for national regulations (5.7). This is because approval of the regulation (5.5) is still pending.<sup>117</sup> The IRM reached out to the City of Rome for additional information on this process but did not receive a response.</p>
<p><b>6. Culture of open government</b></p>	<p><b>Substantial</b></p> <p>Milestones 6.1–6.5 (PCM-DFP): The self-assessment reports there were 61 online events during Open Gov Week 2020 and 2021 involving over 1,400 participants.<sup>118</sup> There was no Open Gov Champion Award in 2020 and the process for 2021 is ongoing.<sup>119</sup> The open.gov.it website redesign is also ongoing and due to be complete by the end of 2021.<sup>120</sup> The self-assessment also reports trainings for the Tuscany Region, Mazara del Vallo Municipality, and Vicenza Municipality in designing their social media strategies and their internal and external social media policies.<sup>121</sup> During 2020, PCM-DFP organized nine webinars for training public administrations on using social media, which involved over 3,500 participants from 381 public institutions.<sup>122</sup> It is unclear if there was special attention paid to issues around hate speech, gender violence, or online discrimination as outlined in Milestone 6.5.</p> <p>Milestone 6.6 (MIBAC): MIBAC reported in the self-assessment that this milestone is still ongoing, such as launching mobile applications, implementing facial recognition and machine learning techniques, and testing online booking services for various museums. It states that Uffizi Gallery queuing times are now less than five minutes.<sup>123</sup></p> <p>Milestones 6.7 and 6.8 (PCM- DIE): These activities were vaguely described in the action plan. The self-assessment reports that PCM-DIE presented information on institutional communication campaign techniques during Open Gov Week 2021, and that it continues to assist institutions with developing and implementing their own communication campaigns. The self-assessment did not link to any open government experiences on the open.gov.it website.<sup>124</sup></p>
<p><b>7. Corruption prevention</b></p>	<p><b>Limited</b></p> <p>Milestones 7.1 and 7.2 (MIT, DIPE, CONSIP): According to the self-assessment, MIMS, DIPE, and CONSIP formed a working group to standardize data and information on public contracts in line with the Open Contracting Data Standard (OCDS). It states they coordinated with the Open Contracting Partnership in assessing and identifying actions needed to meet the OCDS. The resulting action is to now develop an external service outside the current public-contracts platform that pulls together the relevant data under the OCDS. A</p>

	<p>government decree to implement this is being prepared. The release of open data included in the new IT Archive of Public Works (AINOP) is ongoing; due to the complexity and high number of contributing parties, the data is not complete nor evenly spread across regions, cities, and central government. A technical committee to oversee the release of open data in AINOP was set up and is currently revising and validating the data submitted for release.</p> <p>Milestones 7.3–7.5 (University of Messina, Sicily Region, City of Palermo): The University of Messina started its Integrity Pact project in March 2019.<sup>125</sup> Implementation is due to finish by the end of 2021 according to the self-assessment. The self-assessment provides no information on Milestone 7.4 about implementing an Advanced Integrity Pact in the Sicily Region. It provides information on implementing Milestone 7.5 but no evidence for completing an Advanced Integrity Pact on a specific tendering procedure in the City of Palermo.</p>
<p><b>8. Simplification, performance, and equal opportunities</b></p>	<p><b>Substantial</b></p> <p>Milestones 8.1–8.5 (PCM-DFP): According to the self-assessment, Milestone 8.1 on creating digital formats for performance cycle documents was completed before the action plan cycle began (as part of an agreement from December 2018). However, these digital formats not yet publicly available on the web platform that is being developed. The government now collects annual reports on 15 common performance indicators<sup>126</sup> that were identified out of 34 potential indicators following an initial research phase in 2019 with 17 institutions. In November 2019, the government published guidelines on participatory evaluations with citizens,<sup>127</sup> which had been developed with participation from professionals who deal with performance in public administrations.<sup>128</sup> In June 2019, the Ministry of Public Administration issued Directive 1/2019<sup>129</sup> on the management of protected categories of people in the public sector, although the self-assessment does not state how implementation has been monitored.<sup>130</sup></p> <p>Milestone 8.6 (PCM -DFP, AgID): The self-assessment offers no evidence of completion for this milestone (develop a model to measure and compare digitalization projects by administration clusters).</p> <p>Milestones 8.7 and 8.8 (PCM – DFP, PCM-DPO): The Court of Auditors registered a directive on equal opportunities and strengthening the Guarantee Committees (CUG) in public administration on 16 July 2019. Monitoring the implementation of the directive has not yet begun, but PCM is developing an online platform with Formez PA that will facilitate inter-institutional communication and relevant reports. It is unclear to what extent the results from the monitoring may be made public.</p>
<p><b>9. Digital services</b></p>	<p><b>Substantial</b></p> <p>Milestones 9.1–9.5 (AgID): According to the self-assessment, the government appointed a Minister for Innovation, which changed the implementation of some of the originally-envisaged actions. AgID reports it used its website and social media channels to disseminate information about SPID (Italy’s public digital identity system) and its</p>

	<p>specific services. There is no information available about the numbers of people reached through dissemination. AgID has included help on SPID communications in territory agreements with the Emilia Romagna, Puglia, and Lazio regions. The self-assessment also reports that the City of Rome is using AgID’s communication digital services kits and support tools.<sup>131</sup></p> <p>Milestone 9.6 (DGSINFS-MIUR): The <i>Diplome</i> ‘wallet’ is available online.<sup>132</sup> There are no statistics available on usage.</p> <p>Milestones 9.7–9.9 (Agency of Customs and Monopolies): The self-assessment states that the agency developed a prototype process to track an alcohol product using blockchain and aims to finish developing online functions to submit requests and manage the product movement by the end of 2021.<sup>133</sup> The agency enabled an electronic payments system using the pagoPA system beginning February 2021.<sup>134</sup></p> <p>Milestones 9.10 and 9.11 (MAECI): The FAST IT platform, offering consular services online to Italian citizens, now includes new services such as the ability to change residency to another country or district.<sup>135</sup> It is unclear if MAECI took any awareness-raising actions.</p> <p>Milestones 9.12–9.14 (PCM – DPE): PCM-DPE integrated the “eTranslation” software (translations are also checked by a professional) and it’s in use on the Department for European Policies website.<sup>136</sup> The translation process is still being worked on and is not yet available for other administrations.</p> <p>Milestones 9.15–9.18 (PCM – DPF): There is no evidence in the self-assessment or the online repository for georeferencing of children’s education services, nor for innovations facilitating subsidies for newborns and childcare. A manual for supporting childcare professionals was published before the adoption of the action plan.<sup>137</sup> The Department of Family Policy’s website lists the contact details of individuals and organizations who are part of the active-aging network.<sup>138</sup></p> <p>Milestones 9.19–9.21 (Unioncamere): In continuation of existing activities, the self-assessment reports that Unioncamere continued sending informational emails to companies every six months, containing information related to digital business services. It also states that Unioncamere held 140 information events between May and November 2019.<sup>139</sup></p> <p>Milestones 9.22–9.32 (Puglia Region, City of Rome): The Puglia Region reports in the self-assessment that it integrated SPID into nearly all its regional services which are now available online, and is continuing to update its catalogue of digital services and integrate more authorization procedures with SPID.<sup>140</sup> The self-assessment reports that the pandemic delayed the availability of CIE, CNS, and SPID digital identity systems for City of Rome services until January 2021.<sup>141</sup> The PagoPA online payments system is available but still being implemented.<sup>142</sup> The self-assessment reports not having completed Milestone 9.31 on developing Rome’s application solutions to deliver common services to various subsystems. The self-assessment reports that Rome updated its services to citizens and businesses to be compliant with usability and accessibility standards.<sup>143</sup></p>
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	<p>Additional Milestones 9.A1–9.A5 (Ministry of Education): The Ministry of Education added to the original action plan five more milestones under Commitment 9. These sought to update students and schools about COVID-19 rules, support distance learning during the pandemic, promote the development of digital skills in education and adult education, and promote social awareness on cybersecurity and digital citizenship. The self-assessment asserts that online updates were constantly made on COVID-19 requirements; that pupils from all levels of public education received 600,000 devices to facilitate distance learning; that students in hospitals, prisons, and adult students received devices for distance learning; and that the Ministry of Education launched “Schools” and “GoDigital” channels on social media (Facebook had 11k followers, Instagram had 1.7k followers).</p>
<p><b>10. Digital citizenship and skills</b></p>	<p><b>Limited</b></p> <p>Milestones 10.1 and 10.2 (AgID): The guide on digital rights is due to be published by the end of 2021 according to the self-assessment. The process to develop the plan was delayed by the pandemic and change in minister. Webinars were held in 2020 and 2021 for local and central administrations (but not for citizens) on the subject of digital rights.<sup>144</sup></p> <p>Milestones 10.3–10.6 (PCM- DFP): A demo version of the system for public employees to self-assess their digital skills is available online.<sup>145</sup> The self-assessment reports that Formez PA, INAIL,<sup>146</sup> INPS,<sup>147</sup> the Lazio Region, and Unioncamere piloted the website to provide input on improvements. Since then, the assessment part has slowly opened up to other parts of public administrations for use (while the courses are still being prepared). A dashboard of usage statistics is not yet available on the website.</p> <p>Milestones 10.7–10.10 (INPS): Linked to the above milestones, the self-assessment says that central and regional employees from the public administration took assessment tested their digital skills between February and March 2020. A test of a wider group of employees has not started but the Regional Directorate of Emilia Romagna has been identified to be tested on their digital skills, according to the self-assessment. A training plan has yet to be put in place, but the self-assessment says that INPS will select a provider to train employees on digital skills. The self-assessment states that ministerial directives in October 2018 (before the action plan’s adoption) meant that Milestone 10.10 could not be implemented as it was no longer possible to have an agreement between INPS and the Ministry of Education, University and Research.</p> <p>Milestone 10.11 (MIBAC): There is no evidence this milestone was completed.</p> <p>Milestones 10.12–10.21 (PCM-DGSCN): According to the self-assessment, the government internally tested a prototype of the online Youth Portal and a web platform to allow young people to apply for community service; launched pilot versions; and tested and monitored it with a group of young people. Improvements were made to the youth portal and the community service application system, and both are available online.<sup>148</sup> On 5 September 2019, one day after publishing the announcement for volunteers, the new online platform to apply for community service received 4,271 requests for access</p>

	<p>and 787 completed applications.<sup>149</sup> The Youth Platform was relaunched in February 2021.<sup>150</sup></p> <p>Milestones 10.22 and 10.23 (Unioncamere): Unioncamere developed and published a certification scheme for Digital Innovation Managers in May 2021.<sup>151</sup> The self-assessment states that limited dissemination activities have occurred through Unica Desks (information and consultation points for small and medium enterprises).</p> <p>Milestones 10.24–10.32 (Regions and Autonomous Provinces, City of Rome): Emilia-Romagna now offers 10,000 access points to its wifi network throughout the region,<sup>152</sup> online courses to improve citizens’ digital skills,<sup>153</sup> and ten “open laboratory” spaces to encourage collaboration between businesses, citizens, and public administration.<sup>154</sup> The City of Rome adopted regulations for Punti Roma Facile and Scuola Diffusa,<sup>155</sup> and opened two new Punti Roma Facile despite the COVID-19 pandemic.<sup>156</sup> The self-assessment reports that the Scuola Diffusa is currently running digital skills trainings for women. City of Rome employees are not using the digital skills platform, nor were they invited to participate in piloting it (see Milestones 10.3–10.10) but some have taken part in focus groups. City of Rome has created two types of digital-skills training for employees (a general one and one for employees requiring retraining).<sup>157</sup></p> <p>Additional Milestones 10.A1–10.A9 (Ministry of Education): The Ministry of Education added to the original action plan two more clusters of milestones under Commitment 10: to train new teachers online, and train civic education teachers specifically. The self-assessment reports these have been completed, but only provides evidence for the availability of an online training course for new teachers.<sup>158</sup></p>
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<sup>52</sup> Official Gazette, “Decreto-legge 16 luglio 2020, n. 76 Misure urgenti per la semplificazione e l'innovazione digitale. (20G00096) (GU Serie Generale n.178 del 16-07-2020 - Suppl. Ordinario n. 24)” [Decree-law...n. 76 Urgent measures for digital simplification and innovation.] (16 Jul. 2020), <https://www.gazzettaufficiale.it/eli/id/2020/07/16/20G00096/sg>.

<sup>53</sup> Ministry of Public Administration and Italia Open Gov., *Allegato 1 Azioni ed impegni specifici del 4 NAP* [Attachment 1 Actions and specific commitments of the 4 NAP], (Feb. 2022), <https://open.gov.it/rapporti-quarto-nap/>.

<sup>54</sup> *Id.*

<sup>55</sup> Italian National Institute of Statistics

<sup>56</sup> National Institute of Statistics (ISTAT), “Mappa Dei Rischi Dei Comuni Italiani” [Risk Map of Italian Municipalities] (accessed Feb. 2022), <https://www.istat.it/it/mappa-rischi>.

<sup>57</sup> Ministry for Public Administration and Italia Open Gov., *Allegato 1 Azioni ed impegni specifici del 4 NAP*.

<sup>58</sup> Ministry of Cultural Heritage and Activities, renamed Ministry of Culture in March 2021

<sup>59</sup> Central Institute for the Single Catalogue (ICCU), “Alphabetic - avvio dei focus group” [Alphabetic - start of focus groups] (YouTube, 7 July 2021), <https://www.youtube.com/watch?v=aa4jcB-cF10>.

<sup>60</sup> OpenCUP, “Focus Progetti emergenza Covid-19” [Focus on COVID-19 emergency projects] (accessed Feb. 2022), <http://opencup.gov.it/covid-19>.

<sup>61</sup> OpenCUP, “Le iniziative di OpenCUP nella Settimana dell'Amministrazione Aperta 2021” [OpenCUP initiatives at Open Government Week 2021] (14 May 2021), <https://opencup.gov.it/-/le-iniziative-di-opencup-nella-settimana-dell-amministrazione-aperta-2021>; OpenCUP, “Opengov Italia, le iniziative di governo aperto di OpenCUP incontrano il Sudafrica” [Opengov Italia, OpenCUP's open government initiatives meets in South Africa] (3 Mar. 2021), <https://opencup.gov.it/-/opengov-italia-le-iniziative-di-governo-aperto-di-opencup-incontrano-il-sudafrica>.

<sup>62</sup> Ministry for Public Administration and Italia Open Gov., *Allegato 1 Azioni ed impegni specifici del 4 NAP*.

<sup>63</sup> Department for Cohesion Policies

<sup>64</sup> Evaluation and Analysis Unit for Planning

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- <sup>156</sup> City of Rome, “Punti Roma Facile, nuovo centro a Ottavia” [Easy Roma Point, new centre in Ottavia] (3 Feb. 2020), <https://www.comune.roma.it/web/it/notizia/punti-roma-facile-nuovo-centro-a-ottavia.page>; TerzoBinario.it, “Municipio XIII: apertura del Punto Roma Facile all’interno del mercato Borgo Ticino” [Municipalirt XIII: opening of Easy Roma Point inside Borgo Ticino market] (17 Jul. 2021), <https://www.terzobinario.it/municipio-xiii-apertura-del-punto-roma-facile-allinterno-del-mercato-borgo-ticino/>.
- <sup>157</sup> City of Rome, Marco Aurelio School of Capitoline, “Course Categories” (accessed Feb. 2022), [www.elearning.marcoaurelio.comune.roma.it](http://www.elearning.marcoaurelio.comune.roma.it).
- <sup>158</sup> National Institute of documentation, innovation research and education, “Ambiente di support all’anno di formazione e prova per i docenti neoassunti e con passaggio di ruolo e per docenti in percorso annuale \*FIT” [“An environment of support: a year of training and testing for newly hired teachers and teachers with role changes and for teachers in the FIT annual course] (accessed Feb. 2022), <https://neoassunti.indire.it/2021/>.

### III. Multistakeholder Process

#### 3.1. Multistakeholder process throughout action plan implementation

In 2017, OGP adopted the *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.

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 the OGP process. Italy **did not act** contrary to OGP process.<sup>159</sup>

Please see Section 3.2 for an overview of Italy’s performance implementing the *OGP Participation and Co-Creation Standards* throughout the action plan implementation.

Table 3.1: Level of Public Influence

The IRM has adapted the International Association for Public Participation (IAP2) “Spectrum of Participation” to apply it to OGP.<sup>160</sup> In the spirit of OGP, most countries should aspire to “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		

The implementation of Italy’s fourth action plan was significantly affected both by political turnover as well as the COVID-19 pandemic. Changes at the political level had also strongly affected the action plan’s design process.<sup>161</sup> Two different government cabinets took office during the action plan’s implementation period (from 1 July 2019 to 31 July 2021):<sup>162</sup> the Conte II government (5 September 2019–13 February 2021), and the Draghi cabinet (13 February 2021–ongoing).<sup>163</sup> Each cabinet change brought along staff turnover within the public administrations responsible for implementing the action plan commitments, which stalled commitment implementation as well as interaction between civil society and government. For example, Commitments 1 and 10 remained on hold for several months following September 2019 due to changes in the mandate of the responsible administrations.<sup>164</sup> Internal staff turnover also affected the government’s OGP team.

Both government representatives and civil society stakeholders reported that engagement with the government and the government OGP team remained relatively low throughout action plan implementation.<sup>165</sup> This led to challenges in monitoring implementation progress of the action plan’s commitments.<sup>166</sup> Civil society referees (who oversaw implementation of some commitments) indicated a higher degree of interaction with the responsible public administrations compared to others.<sup>167</sup> Due in part to the constraints posed by the pandemic and staff turnover, only three

working group meetings occurred during the implementation period: on 29 July and 11 December 2020 to discuss Commitment 5; and on 26 March 2020 to discuss commitment 8.<sup>168</sup> CSOs agreed that the interaction picked up pace again between April and May 2021 when the new OGP Italy team was appointed under the Draghi government.<sup>169</sup> CSOs praised the OGP team's efforts to rebuild the relationship with the Open Government Forum (Italy's multistakeholder forum) and strengthen process transparency and interaction.<sup>170</sup> However, the timing of the new team's meetings could not offer a real opportunity for civil society input on implementation, as the implementation period ended at the end of July 2021.

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<sup>159</sup> Acting Contrary to Process: Country did not meet (1) "involve" during the development or "inform" during implementation of the action plan, or (2) the government fails to collect, publish, and document a repository on the national OGP website in line with IRM guidance.

<sup>160</sup> IAP2, "IAP2 Spectrum of Public Participation" (2018),

[https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum\\_8.5x11\\_Print.pdf](https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum_8.5x11_Print.pdf).

<sup>161</sup> Federica Genna, *Independent Reporting Mechanism (IRM): Italy Design Report 2019–2021* (OGP, 16 Nov. 2020), 12, <https://www.opengovpartnership.org/documents/italy-design-report-2019-2021/>.

<sup>162</sup> The action plan was initially supposed to run until 30 June 2020, but Italy was granted a one month extension. Ministry for Public Administration and Italia Open Gov., *Allegato 1 Azioni ed impegni specifici del 4 NAP* [Attachment 1 Actions and specific commitments of the 4 NAP], 9-10, (Feb. 2022), <https://open.gov.it/rapporti-quarto-nap/>.

<sup>163</sup> An overview of Italian cabinets in office since 1943 is found here: <https://www.governo.it/it/i-governi-dal-1943-ad-oggi/i-governi-nelle-legislature/192>.

<sup>164</sup> Rosy Battaglia (Cittadini Reattivi), design report interview by IRM researcher, 4 May 2020; Daniela Vellutino (Università di Salerno), design report interview by IRM researcher, 8 May 2000.

<sup>165</sup> Federico Anghelè (The Good Lobby), interview by IRM researcher, 10 Nov. 2021; Ilaria Vitellio (former representative of MappiNA and consultant for Formez PA for the OpenGov project as of Apr. 2021), interview by IRM researcher, 15 Nov. 2021; Susanna Ferro (Transparency International Italy), interview by IRM researcher, 11 Nov. 2021; Sauro Angeletti and Elisa Barbagiovanni Gasparo (Dept. of Public Function), and Sergio Agostinelli and Laura Manconi (Formez PA), focus group discussion with IRM researcher, 17 Nov. 2021.

<sup>166</sup> *Id.*

<sup>167</sup> Anghelè, interview; Susanna Ferro (Transparency International Italy), interview by IRM researcher, 11 Nov. 2021.

<sup>168</sup> Two forum working groups met online between March and December 2020: the group for Commitment 5 met on 29 July 2020 and on 11 December 2020; the group for Commitment 8 met on 26 March 2020. Seven thematic meetings between the government OGP team members and participating CSOs occurred between 12 and 27 May 2021. Ministry for Public Administration and Italia Open Gov., *Allegato 1 Azioni ed impegni specifici del 4 NAP*.

<sup>169</sup> Anghelè, interview; Vitellio, interview; Ferro, interview.

<sup>170</sup> Anghelè, interview; Ferro, interview.



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### 3.2. Overview of Italy'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

Multistakeholder Forum	During Development	During Implementation
<p><b>Ia. Forum established: The Open Government Forum (OGF) is the permanent forum institutionalizing civil society participation in the OGP process. Its composition and operating rules are laid out in the annex to the third and fourth action plan.<sup>171</sup></b></p>	Green	Green
<p>Ib. Regularity: Two OGF working groups met online between March and December 2020.<sup>172</sup> Representatives of civil society and the public administration responsible for monitoring and implementing commitments presented the state of implementation at an online plenary meeting in April 2021.<sup>173</sup> Seven thematic meetings between the government OGP team and CSOs participating in the OGF took place between 12 and 27 May 2021.<sup>174</sup> The government point of contact said that minutes of these meetings were delivered to all participants. There was also a meeting in July 2021 to share the results of implementation and an opportunity for discussion between civil society and public officials.<sup>175</sup> OGP standards require that the forums meet at least once every quarter.</p>	Yellow	Yellow
<p>Ic. Collaborative mandate development: The working principles of the OGF were developed by the OGP Team within the Department of Public Administration. Civil society was able to provide comments during the public consultation phase and the principles were published in the annex to the third action plan.<sup>176</sup></p>	Green	N/A
<p>Id. Mandate public: Information on OGF's remit, membership, and governance structure is available on the national OGP website<sup>177</sup> and published as an attachment to the third and fourth action plans.</p>	Green	Green
<p><b>2a. Multistakeholder: The OGF includes representatives of civil society organizations, academia, and business associations. Government representatives are not included as members. Government representatives are coordinated by the OGP Team, which is part of the Department of Public Administration, and attend the plenary meetings of the OGF.</b></p>	Yellow	Yellow

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2b. Parity: There is no even balance of government and nongovernment representatives in the OGF, as it only includes nongovernment representatives. To facilitate dialogue, officials from the public administration join OGF plenary meetings which can include hundreds of CSO representatives.	Red	Red
<b>2c. Transparent selection: Participation in the OGF is open to all. Subscription is possible through a link available on the national OGP website.<sup>178</sup></b>	Green	N/A
2d. High-level government representation: No high-level government representative attended any of the working meetings that took place during the implementation of the fourth action plan. <sup>179</sup>	Green	Red
<b>3a. Openness:</b> The general public cannot comment on the progress of commitment implementation through the OGP website. However, some commitment initiatives are given general public consultation.	Green	Yellow
3b. Remote participation: Stakeholders confirm the possibility for remote participation exists and that, since the COVID-19 pandemic, most meetings have taken place remotely.	Yellow	Green
3c. Minutes: The government stated that minutes and records of decisions exist and are shared to stakeholders through email. <sup>180</sup> There is no official repository on the national OGP website containing the minutes or records of decisions.	Red	Yellow

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: The national OGP website provides in its “Monitors” section an overview of the progress on implementing the 10 commitments and their milestones. <sup>181</sup> The website was not regularly updated during implementation—it was updated in March 2020 and in July 2021 (at the end of the implementation period).	Yellow
4b. Communication channels: The website does not allow the public to comment on action plan progress updates. There is a general email address on the contact page of the government OGP website. <sup>182</sup>	Yellow
4c. Engagement with civil society: Representatives of civil society and the public administration responsible for monitoring and implementing commitments presented the state of implementation at an online	Yellow

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plenary meeting in April 2021. <sup>183</sup> Ten working group meetings took place between March 2020 and May 2021 (see 1b. above).	
4d. Cooperation with the IRM: The IRM report is shared on the national OGP website during the public comment phase. <sup>184</sup>	Green
4e. MSF engagement: Stakeholders indicate that throughout implementation of the action plan, communication between the government and OGP on commitment progress remained limited. <sup>185</sup> This is attributable to the constraints posed by the COVID-19 pandemic and political turnover. There is no formal mechanism for the OGP to monitor progress and provide feedback on implementation. The 10 CSO referees assigned to each of the 10 commitments were expected to provide additional oversight of implementation progress. However, stakeholders note that the degree of interaction by the responsible public administrations varied between commitments. <sup>186</sup>	Yellow
4f. MSF engagement with self-assessment report: The government submitted the self-assessment report for public consultation on the newly created platform for public consultation, Partecipa.gov. <sup>187</sup> The final self-assessment report is currently unavailable on the national OGP website.	Green
<b>4g. Repository: The “Monitora” section of the national OGP website is a repository for information on progress implementing action plan commitments and their milestones.<sup>188</sup> The website is freely accessible to all. During implementation of the fourth action plan, the website was updated twice (March 2020 and July 2021).</b>	Yellow

<sup>171</sup> Minister for Simplification and Public Administration, *Open Government In Italy 3<sup>rd</sup> Action Plan with Addendum 2016 - 2018* (26 Oct. 2016), 146, <https://open.gov.it/wp-content/uploads/2016/10/2016-10-07-3rd-NAP-Italy-English-version.pdf>; Dept. of Public Function, *4<sup>th</sup> National Action Plan for Open Government 2019-2021* (15 Jul. 2019), 68, [https://www.opengovpartnership.org/wp-content/uploads/2019/07/Italy\\_Action-Plan\\_2019-2021\\_Updated\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/07/Italy_Action-Plan_2019-2021_Updated_EN.pdf).

<sup>172</sup> The working group for Commitment 5 met on 29 July 2020 and on 11 December 2020; the working group for Commitment 8 met on 26 March 2020. Ministry for Public Administration and Italia Open Gov., *Allegato 1 Azioni ed impegni specifici del 4 NAP* [Attachment 1 Actions and specific commitments of the 4 NAP], (Feb. 2022), <https://open.gov.it/rapporti-quarto-nap/>.

<sup>173</sup> Event PA, “Incontro OGP Italia sull’attuazione 4NAP” [OGP Italia meeting on 4NAP implementation] (accessed Feb. 2022), <http://eventipa.formez.it/node/347702>

<sup>174</sup> *Id.*

<sup>175</sup> Open Government Italy, “L’incontro dei partecipanti all’iniziativa OGP Italia apre i lavori per la creazione del Piano nazionale 2021-2023” [Meeting of OGP Italy participants opens the work of creating the national action plan 2021-2023] (24 Aug. 2021) <https://open.gov.it/2021/08/24/incontro-dei-partecipanti-alliniziativa-ogp-italia-apre-i-lavori-per-la-creazione-del-piano-nazionale-2021-2023/>

<sup>176</sup> Minister for Simplification and Public Administration, *Open Government In Italy 3<sup>rd</sup> Action Plan with Addendum 2016 – 2018*, 146.

<sup>177</sup> Open Government Italy, “Open Government Forum” (accessed Feb. 2022), <http://open.gov.it/open-government-forum/>.

<sup>178</sup> *Id.*

<sup>179</sup> Susanna Ferro (Transparency International Italy), interview by IRM researcher, 11 Nov. 2021.

<sup>180</sup> Ilenia De finis (DFP), Information provided to IRM during pre-publication period, 7 Feb. 2022

<sup>181</sup> Open Government Italy, “Monitora” [Monitoring] (accessed Feb. 2022), <https://open.gov.it/monitora-quarto-nap/>.

<sup>182</sup> Open Government Italy, “Contatti” [Contact] (accessed Feb. 2022), <https://open.gov.it/contatti/>

<sup>183</sup> Event PA, “Incontro OGP Italia sull’attuazione 4NAP”.

<sup>184</sup> Open Government Italy, “I rapporti del 4° Piano d’azione nazionale per l’open government” [Report on the fourth national open government action plan] (accessed Feb. 2022), <https://open.gov.it/rapporti-quarto-nap/>.

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<sup>185</sup> Federico Anghel  (The Good Lobby), interview by IRM researcher, 10 Nov. 2021; Ilaria Vitellio, (former representative of MappiNA and consultant for Formez PA for the OpenGov project as of Apr. 2021), interview by IRM researcher, 15 Nov. 2021; Susanna Ferro (Transparency International Italy), interview by IRM researcher, 11 Nov. 2021.

<sup>186</sup> Anghel , interview; Ferro, interview.

<sup>187</sup> ParteciPa, “Consultazione sul report conclusivo del Quarto Piano d’Azione Nazionale per il governo aperto 2019 – 2021” [Consultation on the final report of the Fourth National Action Plan for Open Government 2019 – 2021] (5 Nov. 2021), <https://partecipa.gov.it/processes/consultazione-report-fine-mandato-IV-NAP>.

<sup>188</sup> Open Government Italy, “Monitora.”

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## IV. Methodology and Sources

Research for the IRM reports is carried out by national researchers. All IRM reports undergo a process of quality control led by IRM staff to ensure that the highest standards of research and due diligence have been applied.

The International Experts Panel (IEP) of the IRM oversees the quality control of each report. The IEP is composed 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

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual<sup>189</sup> and in Italy's Design Report 2019-2021.

### About the IRM

**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.



**Federica Genna** collaborated with the IRM to conduct desk research and interviews to inform the findings in this report. Federica Genna is a consultant for the Dutch research and consulting firm Ecorys. Her work focuses on program evaluations and, thematically, good governance, anti-corruption and international security more broadly. This is her second collaboration with the IRM, following the publication of the Design Report for Italy's 2019-2021 Action Plan.

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<sup>189</sup> IRM Procedures Manual, V.3: <https://www.opengovpartnership.org/documents/irm-procedures-manual>

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## Annex I. IRM Indicators

The indicators and method used in the IRM research can be found in the IRM Procedures Manual.<sup>190</sup> 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?
- **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:

1. **Problem:** What is the economic, social, political, or environmental problem? Rather than describing an administrative issue or tool (e.g., 'Misallocation of welfare funds' is more helpful than 'lacking a website.')
2. **Status quo:** What is the status quo of the policy issue at the beginning of an action plan (e.g., "26 percent of judicial corruption complaints are not processed currently.")?
3. **Change:** Rather than stating intermediary outputs, what is the targeted behavior change that is expected from the commitment's implementation

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(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.

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<sup>190</sup> “IRM Procedures Manual,” OGP, <https://www.opengovpartnership.org/documents/irm-procedures-manual>