

EUROPEAN UNION

Political corruption has tremendous consequences worldwide. Transparency in political finance, political influence, and state administration can help reduce corruption and make democratic processes more legitimate, more pluralistic, and more representative. Open data on decision-making and decision makers can be a powerful tool to identify whose interests shape how governance decisions are made and implemented.

New data from 67 OGP countries, including 20 European Union (EU) countries, shows that there are significant gaps in data frameworks and data availability across a variety of areas related to countering political corruption. This module is part of the *Broken Links: Open Data to Advance Accountability and Combat Corruption* report¹ which offers an overview of data frameworks and data availability in OGP countries across eight policy topics using data from the [Global Data Barometer \(GDB\)](#).² The goal of the report is to identify areas for improvement and generate recommendations for future OGP commitments.

This module focuses specifically on the state of data frameworks and availability in the 20 EU countries in OGP assessed by the GDB (see *Countries in this analysis*). This regional analysis includes:

- A summary of GDB's assessment of the state of data to counter corruption in the region
- An overview of OGP commitments across policy areas assessed
- Highlights in featured policy areas with data from both GDB and OGP
- Examples of regional innovations

¹ You can find the report *Open Data to Advance Accountability and Combat Corruption* here: <https://www.opengovpartnership.org/broken-links/>.

² View more details about the Global Data Barometer here: <https://globaldatabarometer.org/>.

Countries in this Analysis

EU countries assessed by GDB and included in this analysis

- ❖ Bulgaria
- ❖ Croatia
- ❖ Czech Republic
- ❖ Denmark
- ❖ Estonia
- ❖ Finland
- ❖ France
- ❖ Germany
- ❖ Greece
- ❖ Ireland
- ❖ Italy
- ❖ Latvia
- ❖ Lithuania
- ❖ Malta
- ❖ Netherlands
- ❖ Portugal
- ❖ Romania
- ❖ Slovak Republic
- ❖ Spain
- ❖ Sweden

EU countries not assessed by GDB³

- ❖ Luxembourg

Key Takeaways

- **While the European Union has generally high rates of data availability, some countries still lack publicly available data on key anti-corruption priorities.** Less than half of EU countries in OGP publish data on right to information performance or lobbying.
- **Data quality remains an area for improvement.** Datasets often lack high-value elements, such as common identifiers that enable monitoring and oversight across datasets. Most data is also not published in an open format, making it hard to use.
- **Many EU countries have not used OGP action plans to advance commitments in key areas assessed in this report.** Public procurement and rulemaking are the only areas where over half of EU countries have made at least one relevant commitment through their OGP action plans.

³ Due to inability to find researchers, 10 of the 77 OGP countries were not included in the Global Data Barometer's assessment. EU countries that are not OGP participants include Austria, Belgium, Cyprus, Hungary, Poland, and Slovenia.

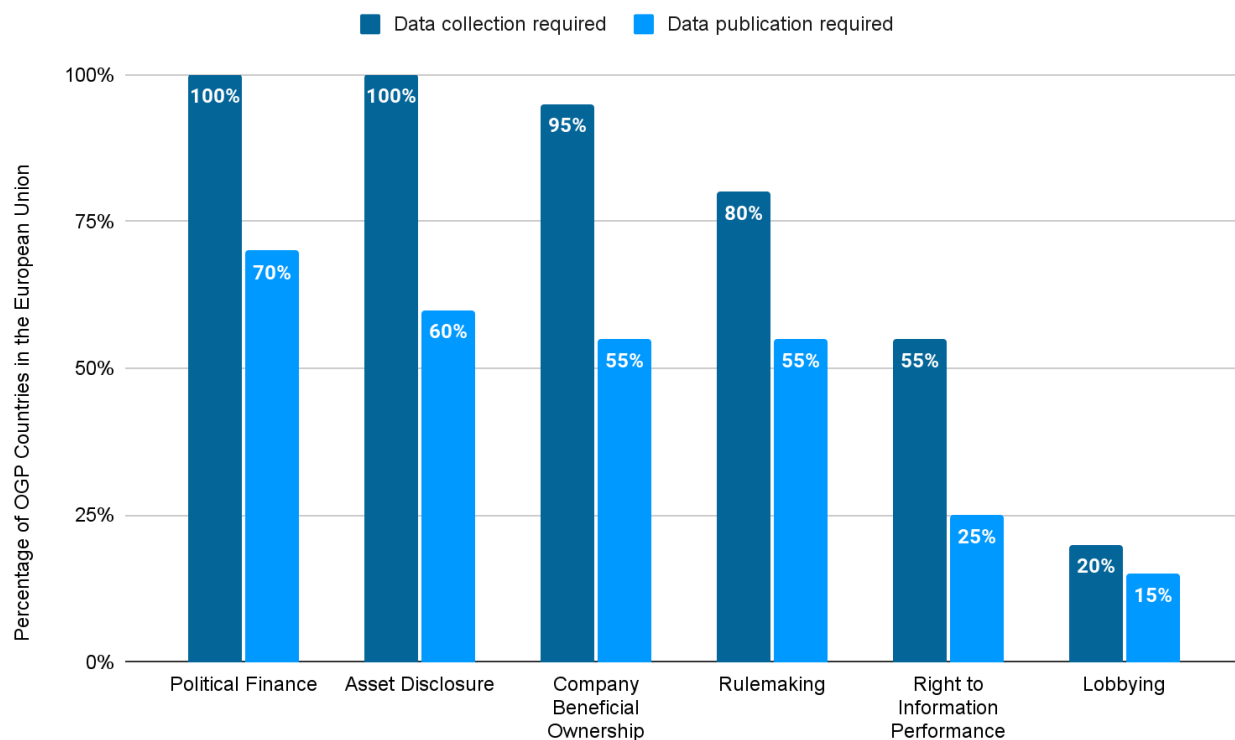
Overall State of Data to Combat Corruption

Legal Frameworks

Most countries in the European Union have operational laws requiring the collection of data used to combat corruption (see Figure 1).⁴ An exception to this is lobbying, where only 20 percent of countries require the collection of data. For all policy areas, a gap exists between the number of countries that require data collection and the number that require data publication.

Figure 1: Gaps between required data collection and publication

This figure shows the percentage of OGP countries in the EU with data collection and disclosure requirements across policy areas. The sample includes the 20 OGP countries in the EU assessed by the Global Data Barometer.



Note: This analysis only considers binding laws and policies that exist and are operational.⁵

⁴ The Global Data Barometer assesses whether countries have set requirements to publish data through binding policy, regulations, or law. Legal frameworks governing public procurement and land tenure data have not been assessed by the GDB. However, information on the availability of procurement and land tenure data was collected (see *Data Availability and Usability*).

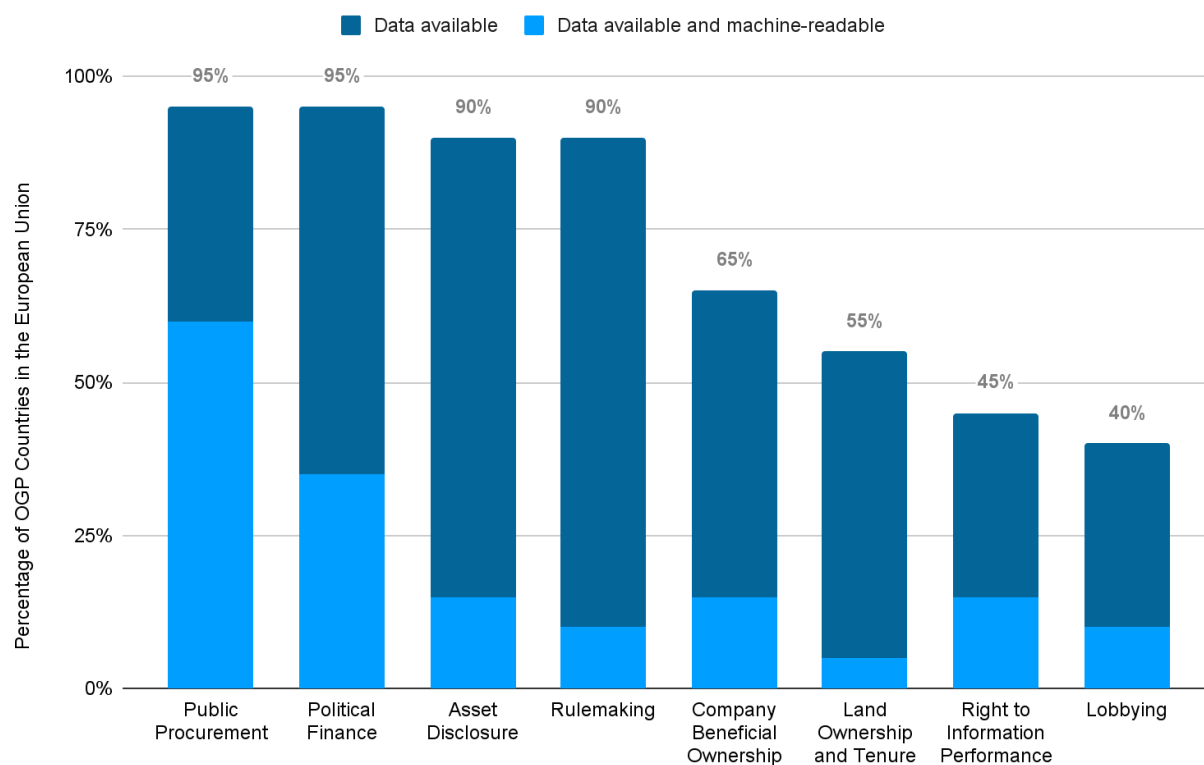
⁵ For more details see the *About Broken Links* section of the report: <https://www.opengovpartnership.org/broken-links/>.

Data Availability and Usability

While most European Union countries publish data on public procurement, political finance, asset disclosure and rulemaking, a significant percentage of countries lack publicly available data on other key anti-corruption priorities, such as lobbying and right to information performance. Where countries do publish data, making this data available to the public in an open format remains a challenge. In most areas, less than one-quarter of countries publish data in a machine-readable format, which makes it difficult for users to analyze the data for monitoring and accountability purposes (see Figure 2).

Figure 2: Gaps between data availability and usability

This figure shows the percentage of OGP countries in the EU with available data and the number with machine-readable data. The sample includes the 20 OGP countries in the EU assessed by the Global Data Barometer.



Note: For this analysis, countries with “partial” disclosure are considered cases of “no” disclosure.⁶

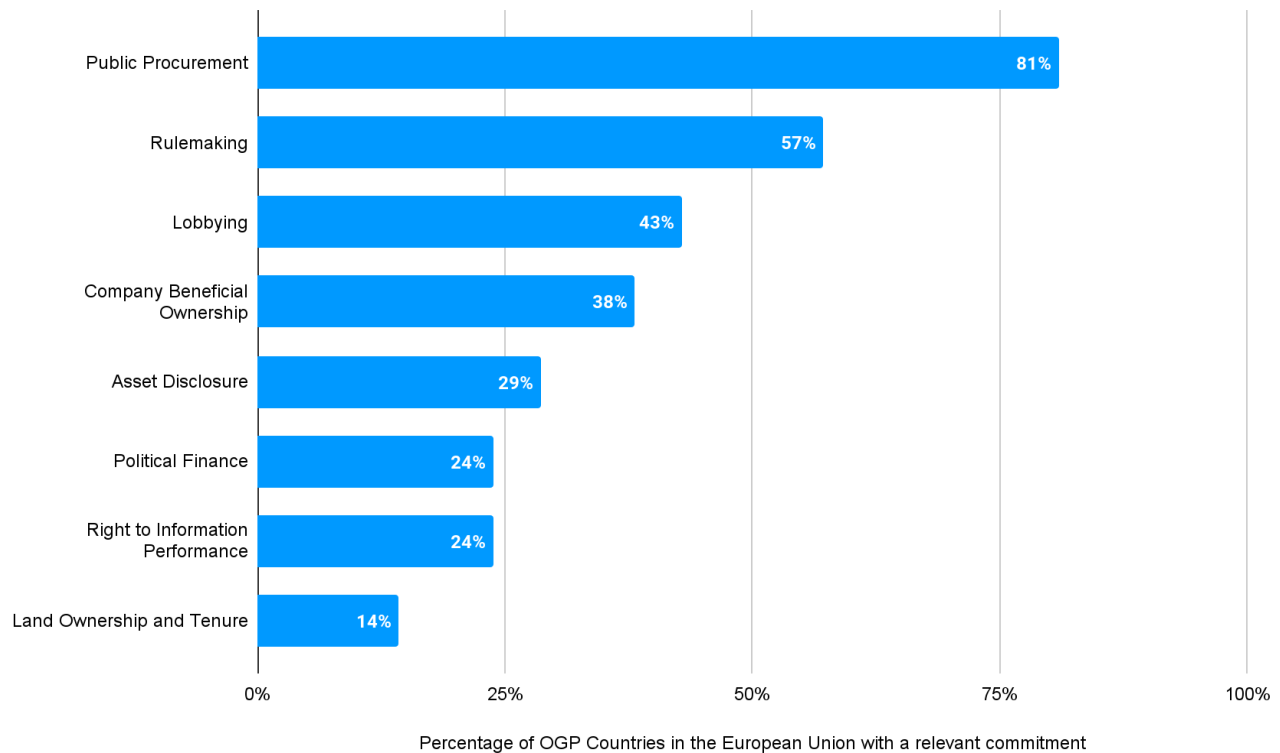
⁶ For more details see the *About Broken Links* section of the report: <https://www.opengovpartnership.org/broken-links/>.

State of Progress Through OGP

While many European Union countries have advanced open government reforms to counter corruption, many countries have not used OGP action plans to advance commitments in key areas assessed in this report (see Figure 3). Most OGP countries in the European Union have made a commitment on public procurement, and over half have committed to greater transparency of rulemaking. Few European Union countries, however, have used their OGP action plans to address asset disclosure or political finance reforms.

Figure 3: Progress made through OGP commitments

This figure shows the percentage of OGP countries in the EU that have made at least one relevant OGP commitment across each area assessed in this report. The sample includes the 21 OGP countries in the EU.



Featured Policy Areas

The following policy areas were selected for a more detailed analysis based on a variety of factors, including regional priorities, areas of momentum, and areas for growth.

Asset Disclosure

Key Findings from the Global Data Barometer

- **All countries have legal frameworks governing asset disclosure data.** While all OGP countries in the European Union have operational laws requiring the collection of asset disclosure data, only 12 require the data to be published.
- **Most countries publish their data, but datasets lack usability.** Eighteen of the 20 assessed countries make asset disclosure data available online. (Czech Republic and Sweden are the two countries without available data.) However, only three countries publish this data in machine-readable format (France, Portugal, and Spain), which enables the public to easily re-use the data for analysis.
- **Many datasets lack high-value information.** For example, eight countries that publish data do not include information on income, assets, and liabilities. Only three countries (Bulgaria, Croatia, and Romania) publish information on family members' assets and liabilities, whereas three others (Estonia, Germany, and Portugal) are the only countries that use unique identifiers for each individual that must submit a declaration.

State of Progress Through OGP

- **Most members have not made an OGP commitment related to asset disclosure.** Seven OGP members – including one local member, Madrid – in the European Union have made a total of 11 commitments on asset disclosure. However, Latvia is the only member currently implementing a commitment in this area.⁷
- **Commitments in this area have not shown strong results.** Although OGP's Independent Reporting Mechanism (IRM) has found many of these commitments to be ambitious in their design, only Madrid's commitment has achieved strong early results in opening government.⁸

Regional Innovations

France	The High Authority for Transparency in Public Life publishes asset disclosure data in open data format, along with visualizations for users to browse the data. ⁹
Portugal	Although not bulk downloadable, Portugal publishes information on registered interests for members of parliament. ¹⁰

⁷ As of September 2022, 21 national and 10 local OGP members in the EU had submitted at least one action plan. See an updated list of OGP national and local members: <https://www.opengovpartnership.org/our-members/>.

⁸ Learn more about how the Independent Reporting Mechanism assesses commitments: <https://www.opengovpartnership.org/irm-guidance-overview/>.

⁹ High Authority for Transparency in Public Life, "Consult the declarations", <https://www.hatvp.fr/consulter-les-declarations/#open-data>.

¹⁰ Assembly of the Portuguese Republic, "Registration of Interests", <https://www.parlamento.pt/RegistoInteresses/Paginas/RegistoInteressesDeputados.aspx>.

Company Beneficial Ownership

Key Findings from the Global Data Barometer

- **Nearly all countries have legal frameworks governing company beneficial ownership data.** At the time of the GDB's assessment, Lithuania was the only EU country in OGP that did not have an operational law governing the collection of company beneficial ownership data. Additionally, eleven countries require the data to be published. Many of these countries' laws can be attributed to the [European Union directive](#) that requires member countries to collect and publish beneficial ownership data.¹¹
- **Over half of countries publish data, but datasets lack usability.** Thirteen of the 20 assessed countries make company beneficial ownership data available online. However, data is freely accessible in only six countries. Denmark and Latvia are the only countries whose data meets all open data standards.
- **Datasets have some high-value information, but are missing key pieces.** Most datasets include identifying information for beneficial owners and use unique company identifiers, which is a sign of strength in the region. In terms of missing information, half of countries do not publish data on detailed interests of beneficial owners, and only four countries are publishing full datasets according to relevant data standards like the Beneficial Ownership Data Standard (Denmark, Finland, Italy, and Romania).

State of Progress Through OGP

- **Most members have not made an OGP commitment related to beneficial ownership transparency.** Eight OGP countries in the European Union have made a total of nine commitments on beneficial ownership transparency. Lithuania, Portugal, and the Slovak Republic are implementing commitments through their current action plans.
- **Commitments in this area are typically ambitious in their design.** The IRM has evaluated a majority of these commitments as having high potential for results as written. Since most of these are recent, they have not yet been evaluated for completion or early results.

Regional Innovations	
Denmark	Denmark's beneficial ownership register (Virk) is updated daily and includes historical data for the majority of companies registered in the country since 1999. ¹²
Latvia	Beneficial ownership information is published on Latvia's Open Data Portal ¹³ with some data published according to the Beneficial Ownership Data Standard . ¹⁴

¹¹ EUR-Lex, "Document 02015L0849-20210630," n.d.,

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02015L0849-20210630>.

¹² Danish Business Authority, "CVR - Central Business Register", <https://datacvr.virk.dk/>.

¹³ "Patieso Labuma Guvēju Dati Atbilstoši BODS Standartam," n.d., <https://data.gov.lv/dati/eng/dataset/plg-bods>.

¹⁴ Open Ownership, "Beneficial Ownership Data Standard (v0.2)," n.d., <https://standard.openownership.org/en/0.2.0/>.

Lobbying

Key Findings from the Global Data Barometer

- **Few EU countries have legal frameworks governing lobbying data.** During the period of GDB's assessment, only four EU countries had an operational law requiring collection of lobbying data (Estonia, France, Ireland, and Lithuania). All of these countries also require data publication, except for Lithuania.
- **Some countries publish lobbying data, but data lacks usability.** Eight of the 20 assessed EU countries make lobbying data available online (Estonia, France, Germany, Ireland, Italy, Lithuania, Netherlands, and Spain). France is the only country, however, whose lobbying data meets all open data standards.
- **Datasets lack key pieces of high-value information.** Half of the available lobbying datasets contain information on the topic of interactions and lobbyists' goals. Two countries use unique identifiers for each lobbyist (Lithuania and Spain), while no countries publish data on money spent on lobbyists' interactions or dates and times of meetings

State of Progress Through OGP

- **Lobbying is becoming an increasingly popular area for reform for EU members in OGP.** Ten members – including one local member, Madrid – have made a total of 18 lobbying commitments through their OGP action plans. Six of these commitments are currently being implemented by Estonia, France, Ireland, and Spain.
- **Several lobbying commitments have seen strong early results.** Three of the nine lobbying commitments assessed by the IRM have achieved strong early results ([Ireland](#),¹⁵ [Italy](#),¹⁶ and [Madrid](#)¹⁷).

Regional Innovations	
France	France's user-friendly directory displays information on over 2,000 lobbyists that can be downloaded in open data format. ¹⁸
Lithuania	Lithuania's lobbying register contains unique identifiers for each lobbyist and information on lobbyists' goals. ¹⁹

¹⁵ Ireland, "Regulation of Lobbying" (IE0014),

<https://www.opengovpartnership.org/members/ireland/commitments/ie0014/>.

¹⁶ Italy, "Transparency Registry of the Ministry for Economic Development" (IT0048),

<https://.opengovpartnership.org/members/italy/commitments/it0048>.

¹⁷ Madrid, Spain, "Creation of a Mandatory Lobby Registry",

<https://www.opengovpartnership.org/members/madrid-spain/commitments/mad0001/>.

¹⁸ High Authority for Transparency in Public Life, "Consult the directory of interest representatives",

<https://www.hatvp.fr/le-repertoire/#open-data-repertoire>.

¹⁹ Chief Official Ethics Commission, "Information System of Transparent Legislative Processes (SKAIDRIS)",

<https://skaidris.vtek.lt/public/home/main>.