NORDIC+

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 eight countries in the Nordic+ peer learning group[1], 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* report[2] 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).[3] 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 eight Nordic+ 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

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[1] Nordic+ is a peer learning group of countries in OGP who share similar values and face similar challenges. Along with the countries listed in the "Countries in this analysis" box, Scotland and Iceland (as an OGP observer country) are also members of the Nordic+ group.

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

[3] View more details about the Global Data Barometer here: https://globaldatabarometer.org/.

BROKEN LINKS: OPEN DATA TO ADVANCE ACCOUNTABILITY AND COMBAT CORRUPTION

Open Government Partnership

Countries in this Analysis

Nordic+ countries assessed by GDB and included in this analysis

- ❖ Denmark
- ❖ Estonia
- ❖ Finland
- ❖ Germany
- ❖ Latvia
- ❖ Lithuania
- ❖ Netherlands
- ❖ Sweden

Nordic+ countries not assessed by GDB[4]

- ❖ Norway

Key Takeaways

→ **While the Nordic+ group has generally high rates of data availability, some countries still lack publicly available data on key anti-corruption priorities.** For example, many countries do not publish data on lobbying or right to information performance.

→ **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.

→ **Most of these areas of anti-corruption have seen few OGP commitments from countries in the Nordic+ group.** While over half of members have made a public procurement commitment, few have made commitments in key areas like lobbying or asset disclosure.

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[4] Due to inability to find researchers, 10 of the 77 OGP countries were not included in the Global Data Barometer's assessment.
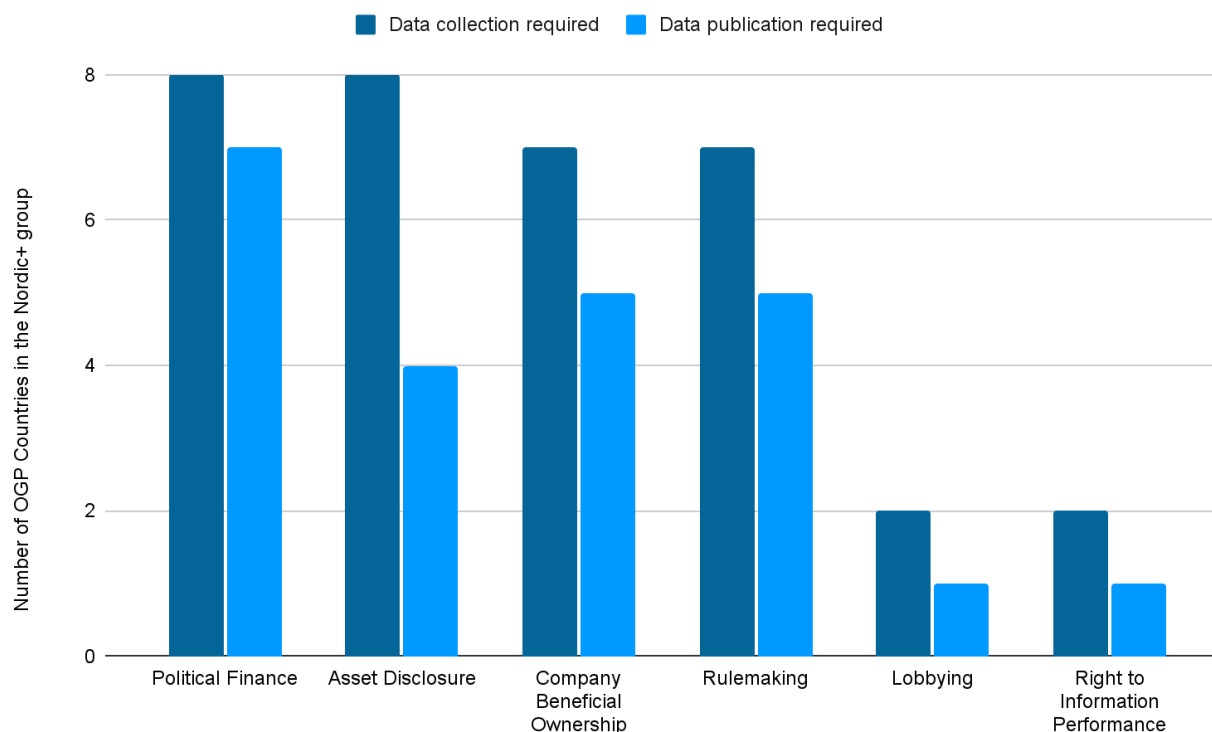
Overall State of Data to Combat Corruption

Legal Frameworks

Most countries in the Nordic+ group have operational laws requiring the collection of data used to combat corruption (see Figure 1).[5] Lobbying and right to information performance data are areas of exception, where only two 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 number of OGP countries in the Nordic+ group with data collection and disclosure requirements across policy areas. The sample includes the eight OGP countries in the Nordic+ group assessed by the Global Data Barometer.

Note: This analysis only considers binding laws and policies that exist and are operational.[6]

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[5] 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*).

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

Data Availability and Usability

Across most areas, data is widely available among the Nordic+ group of countries. Nearly all countries publish data on political finance, public procurement, rulemaking, and asset disclosure (see Figure 2). Only one country in the Nordic+ group, however, publishes data on right to information performance (Germany). Across all areas, publishing data in a machine-readable format remains a challenge for many countries. For example, no countries publish asset disclosure data that is machine-readable, making it difficult for users to analyze the data for monitoring and accountability purposes.

Figure 2: Gaps between data availability and usability
This figure shows the number of OGP countries in the Nordic+ group with available data and the number with machine-readable data. The sample includes the eight OGP countries in the Nordic+ group assessed by the Global Data Barometer.

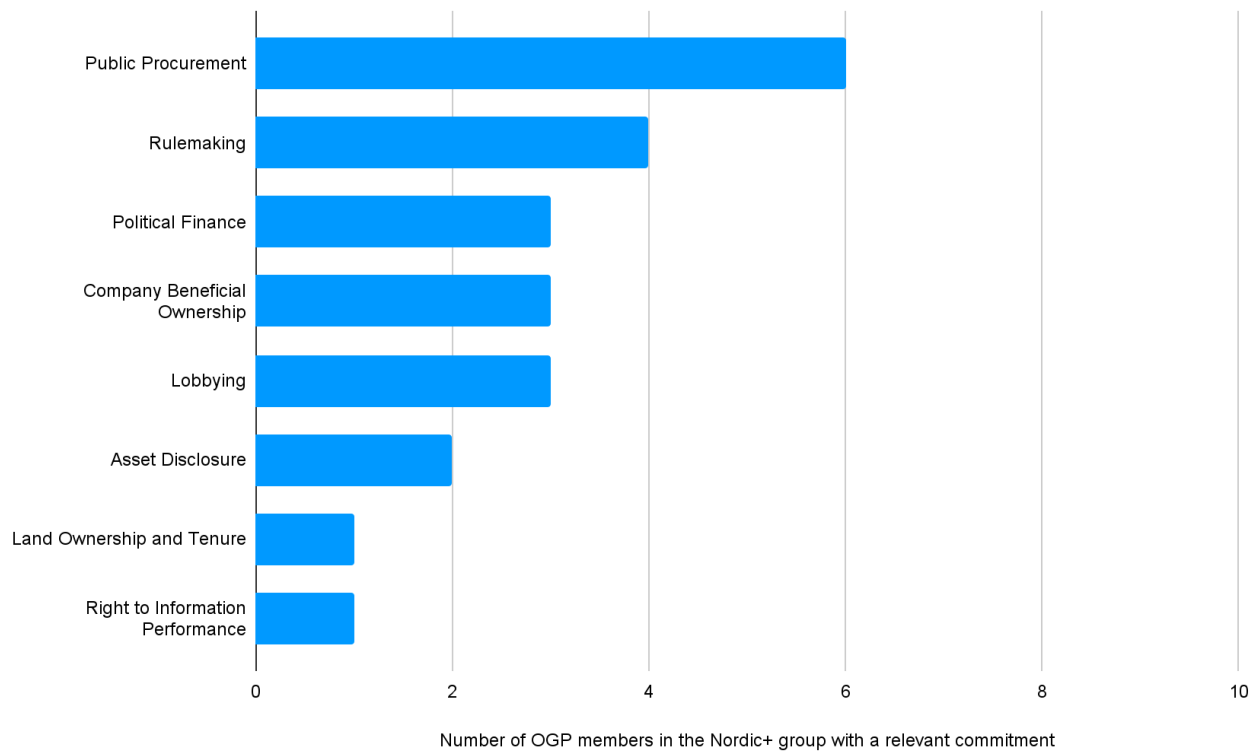*Note: For this analysis, countries with "partial" disclosure are considered cases of "no" disclosure.[7]*

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[7] For more details see the *About Broken Links* section of the report: https://www.opengovpartnership.org/broken-links/.

State of Progress Through OGP

Most policy areas covered in this report have seen few commitments from countries in the Nordic+ group (see Figure 3). The most popular area has been public procurement, where six of the ten Nordic+ members have made a commitment. On the other hand, few members of the Nordic+ group have made commitments related to asset disclosure or right to information performance.

Figure 3: Progress made through OGP commitments
This figure shows the number of OGP members in the Nordic+ group that have made at least one relevant OGP commitment across each area assessed in this report. The sample includes the ten OGP members in the Nordic+ group.

Number of OGP members in the Nordic+ group with a relevant commitment

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.

Lobbying

Lobbying is an essential part of a democracy. But, often, interest groups with more resources get to influence policy-making more effectively. Knowing who influences the law, who they represent, and how much they spend becomes fundamental to shaping their advocacy strategy and determining how they should engage leaders.

Key Findings from the Global Data Barometer

- **Most countries do not require collection or publication of lobbying data.** Only two countries in the region (Estonia and Lithuania) have frameworks governing the collection of lobbying data. Estonia is the only country where complying with the framework requires the publication of lobbying data.
- **Lobbying data is freely available in some countries, but not usable.** Despite some countries not legally requiring the collection or publication of lobbying data, four of the eight countries assessed by GDB publish lobbying data online that is freely accessible (Estonia, Germany, Lithuania and Netherlands). However, none of these datasets are openly licensed or machine-readable, which prevents the public from re-using the data for monitoring purposes.
- **Datasets typically lack certain high-value information.** Estonia and Lithuania publish data on the topics of lobbyists' interactions, while Germany's data includes information on lobbyists' goals. No countries in the Nordic+ group, however, publish information on meeting dates and times between lobbyists and public officials or information on money spent by lobbyists.

State of Progress Through OGP

- **Lobbying has not been a prominent area of focus for the Nordic+ group in OGP.** Three countries (Estonia, Finland, and Latvia) have made a total of five commitments related to lobbying.[8] Estonia is the only country implementing a lobbying commitment through their current action plan.
- **Lobbying commitments generally do not focus on open data.** Only one commitment made by Finland includes a reference to publishing lobbying information in an open data format.[9] Other commitments focus on transparency in lobbying more generally and passing legislation to regulate lobbying.

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[8] As of August 2022, ten OGP members (nine national and one local) in the Nordic+ group had submitted at least one action plan. See an updated list of OGP national and local members: https://www.opengovpartnership.org/our-members/.

[9] Finland, "Open Procedures" (FI0021), https://www.opengovpartnership.org/members/finland/commitments/fi0021/.

- **Most commitments are fully implemented.** According to the Independent Reporting Mechanism (IRM), four of the five commitments were substantially or fully completed. However, none of the commitments have produced significant results so far.[10]

Regional Innovations	
Germany	Germany's lobbying register includes information about lobbyists' goals for lobbying activities.[11] More recently, a searchable website[12] with visualizations has been published for users.[13]
Lithuania	Lithuania's lobbying register contains identifying information for each client of lobbyists and the topic of each interaction between a lobbyist and a public official.[14]

Company Beneficial Ownership

Publishing digital registers with beneficial ownership information helps shine a light on secretive legal structures that can be exploited to launder the proceeds of corruption and other corrupt activities.

Key Findings from the Global Data Barometer

- **Most countries have laws on beneficial ownership transparency**. All countries in the Nordic+ group except Lithuania have operational legal frameworks in place requiring the collection of beneficial ownership information. Five countries (Denmark, Estonia, Germany, Latvia, and Netherlands) require the publication of company beneficial ownership data.
- **Datasets lack usability.** Six countries publish company beneficial ownership data online, but data is only freely accessible in three countries. Only two countries (Denmark and Latvia) publish beneficial ownership information that meets all open data standards, including open license and machine-readability.
- **Interoperability remains a challenge.** Countries should also ensure that beneficial ownership data is interoperable with other relevant datasets by using common identifiers for companies and owners across datasets. Currently, two countries who publish beneficial ownership data do so (Estonia and Latvia). Use of such identifiers will facilitate automated data validation and raise data quality.

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[10] Learn more about how the Independent Reporting Mechanism assesses commitments: https://www.opengovpartnership.org/irm-guidance-overview/.
[11] German Bundestag, "Public List of Registered Associations", https://www.bundestag.de/dokumente/parlamentsarchiv/ueberblick/196912-196912.
[12] German Bundestag, "Lobby Register", https://www.lobbyregister.bundestag.de/startseite.
[13] This website was published outside of the period of GDB's study, and therefore is not captured in GDB's data.
[14] Chief Official Ethics Commission, "Information System of Transparent Legislative Processes (SKAIDRIS)", https://skaidris.vtek.lt/public/home/main.

- **Countries in the Nordic+ group are leaders in beneficial ownership transparency.** Beneficial ownership transparency is a relatively new area of focus for most OGP countries. Still, three countries in the Nordic+ group (Latvia, Lithuania, and Norway) have already made commitments to collect and publish beneficial ownership data.
- **Commitments focus on the creation of beneficial ownership registers.** All four of the commitments focus on creating a public register for beneficial ownership commitments. However, only Lithuania's commitment explicitly mentions the publication of information in open data format.[15]

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.[16]
Latvia	Beneficial ownership information is published on Latvia's Open Data Portal[17] according to the Beneficial Ownership Data Standard.[18]

Political Finance

Knowing who gave to campaigns, politicians, and parties is essential to ensure that officials serve voters and not the highest bidders. Knowing that campaigns spend that money on legitimate expenses also ensures that everyone follows the same rules. Additionally, it can shed light on corporations' ideological and political stances, so consumers make informed decisions.

Key Findings from the Global Data Barometer

- **Legal frameworks are already in place.** All countries in the Nordic+ group have laws requiring the collection of political finance data. Lithuania is the only country that does not legally require the data to be published.
- **Data is freely available, but not always usable.** All countries publish political finance data online and make it freely accessible, but only four countries (Estonia, Finland, Lithuania, and Sweden) publish their data in machine-readable format.
- **High-value information is limited.** While most countries publish information on income and spending of each party or candidate, few countries publish names of donors or data on in-kind and non-financial support. Additionally, only three countries (Denmark, Estonia, and Latvia) use unique identifiers for each donor, which allows for cleaner data and interoperability with other datasets.

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[15] Lithuania, "Ensuring Public Access to Beneficial Ownership Data" (LT0030), https://www.opengovpartnership.org/members/lithuania/commitments/lt0030/.
[16] Danish Business Authority, "CVR - Central Business Register", https://datacvr.virk.dk/.
[17] Register of Enterprises of the Republic of Latvia, "Beneficiary data according to the BODS standard", https://data.gov.lv/dati/lv/dataset/plg-bods.
[18] Open Ownership, "Beneficial Ownership Data Standard (v0.2)", https://standard.openownership.org/en/0.2.0/.

- **Similar to other OGP countries, countries in the Nordic+ group have made few political finance commitments.** Three countries (Latvia, Lithuania, and Netherlands) have made commitments related to transparency in political finance. The Netherlands is the only country implementing a commitment through their current action plan.[19]
- **Commitments generally focus on transparency.** Only one commitment made by Latvia specifically focuses on publishing political finance information as open data.[20] Other commitments focus more broadly on political party and campaign finance transparency and on passing legislation regulating political finance.

Regional Innovations	
Estonia	Estonia's Financial Reports Data includes a wide range of information about political parties and candidates, including their income, assets and liabilities, campaign spending, and in-kind and non-financial support.[21]
Lithuania	Lithuania's Central Electoral Commission has published searchable data on political finances that goes back to 2016 and meets all open data principles.[22]

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[19] Netherlands, "Present legislation on campaign finance transparency" (NL0039), https://www.opengovpartnership.org/members/netherlands/commitments/nl0039/.
[20] Latvia, "Open Data" (LV0041), https://www.opengovpartnership.org/members/latvia/commitments/lv0041/.
[21] Political Parties Financing Supervision Committee, "Financing reports", https://www.erjk.ee/en/financing-reports/revenues-political-parties.
[22] Supreme Election Commission of the Republic of Lithuania, "Reports," https://www.rinkejopuslapis.lt/ataskaitu-formavimas.