

Independent Reporting Mechanism

Results Report:
Sweden 2019-2022

Open
Government
Partnership



Independent
Reporting
Mechanism

Executive Summary

Only one of the four commitments from Sweden's action plan saw early results from publishing open datasets. There was very limited engagement between government and civil society to oversee development and progress of the action plan. Greater political leadership in open government and ongoing dialogue with civil society could encourage greater ambition in future action plans. Establishing a Multi-Stakeholder Forum to oversee the plan could also encourage full completion of commitments.

Early Results

This action plan included four commitments, all with a clear focus on open data. The one noteworthy commitment was to have a national open data action plan for Sweden; the plan was drafted but not adopted, and therefore did not have any early results in opening government. It would have otherwise incorporated 'open by default' and 'open by design' principles into Swedish law.

The commitment to establish a new open data portal (www.dataportal.se) saw marginal early results as the number of publicly available datasets tripled during the action plan cycle and there were examples of reuse of the data. However, datasets such as public procurement, which are considered a priority for civil society, were not sufficiently addressed by public authorities.¹ While 'open data by default' was proposed in the draft national open data strategy, access to high-value datasets such as public procurement may be subject to fees² and beneficial ownership data requires e-identification/online identification (which may run counter to the Act on Access to Public Information that states that anyone can request public information anonymously).³

Completion

Commitment 2 was fully completed, as the government completed numerous workshops with civil society and launched the open data portal (www.dataportal.se), which contains thousands of new datasets. Commitment 1, to develop a national open data action plan, was only partially completed, and actual adoption of the plan did not happen. Commitment 3 also had limited completion, and after the online project to foster pilot activities in data-driven innovation finished, the website was closed down. Commitment 4, to increase collaboration with civil society on open data, was not fully completed because of a lack of sufficient dialogue with civil society.

Participation and Co-Creation

The OGP process in Sweden is coordinated jointly by the Ministry of Infrastructure and the Agency for Digital Government (DIGG), established in 2018 under the authority of the Ministry of Infrastructure.⁴ There was no Multi-Stakeholder Forum during both the co-creation and implementation periods of the action plan cycle. During co-creation, there was limited engagement with civil society, and because of a lack of a Multi-Stakeholder Forum and a lack of reasoned response to civil society input, Sweden acted contrary to the Open Government Partnership (OGP) process.⁵ During implementation, there were consultations with civil society, but there were no meetings relating to oversight of the action plan. Finally, there is no available repository as per the OGP's Participation and Co-Creation Standards.

IMPLEMENTATION AT A GLANCE

LEVEL OF COMPLETION

1/4

Complete or substantially complete commitments

EARLY RESULTS

1/4

Commitments with early results

0/4

Commitments with major or outstanding early results

COMPLIANCE WITH MINIMUM REQUIREMENTS

Not acting according to OGP process.

Implementation in Context

According to a public official, the COVID-19 pandemic slowed progress on implementation and likely hindered dialogue with civil society.⁶ The implementation of the original 2019–2021 action plan was extended to 2022.

The government faced a political crisis in June 2021 after the prime minister was ousted by a no-confidence vote.⁷ However, the impact of these political events on the OGP process appears to have been limited. Those in charge of commitments within the administration stayed in office, and there was no notable difference to the already-limited political leadership on open data policy between governments (for example, there was no commitment to adopt the national open data action plan).

An EU directive on open data in the public sector entered into force in July 2019.⁸ The directive was an external driver of the change in approach to publishing open data in Sweden.⁹ The directive is mentioned in the draft action plan on open data¹⁰ proposed by DIGG (developed as part of Commitment 1). The Lantmäteriet (the Swedish mapping, cadastral and land registration authority) identified 300 datasets to be published in compliance with the EU directive,¹¹ indicating that Sweden committed in the OGP action plan to do what the country had to do to comply with EU rules. The boost in data release reflects those EU requirements.

¹ Despite a public procurement law passed in 2019, there is still no centralized public database for public procurement in Sweden.

² A problem mentioned by all interviewees. Lotta Rydstrom, Transparency International Sweden, interview by the IRM, 6 February 2023; Sumbat Daniel Sarkis, OGP point of contact, interview by the IRM, 24 October 2022; Pierre Mesure, Civic Tech Sweden, interview by the IRM, 20 January 2023; Ulrika Domellöf Mattsson and Kristine Ulander, DIGG, interview by the IRM, 28 November 2022; Mattias Axell, Open Knowledge Sweden, interview by the IRM, 6 February 2023.

³ Lotta Rydstrom, Transparency International Sweden, in email correspondence with the IRM, 6 April 2023.

⁴ After the end of this action plan cycle, responsibility for the OGP process moved to the Division on Public Administration within the Ministry of Finance.

⁵ IRM, “Sweden Design Report 2019-2021”, 4 January 2021, <https://www.opengovpartnership.org/documents/sweden-design-report-2019-2021/>.

⁶ Sumbat Daniel Sarkis, OGP point of contact, interview by the IRM, 24 October 2022.

⁷ Johan Ahlander and Simon Johnson, “Swedish PM Lofven ousted by parliament in no-confidence vote,” Reuters, 21 June 2021, <https://www.reuters.com/world/europe/swedish-pm-brink-parliament-readies-monday-no-confidence-vote-2021-06-21/>.

⁸ “Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (recast),” European Commission, <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1561563110433&uri=CELEX:32019L1024>.

⁹ Pierre Mesure, Civic Tech Sweden, interview by the IRM, 20 January 2023.

¹⁰ *Förslag till handlingsplan för tillgängliggörande och vidareutnyttjande av öppna data [Proposal for an action plan for making available and reusing open data]*, Agency for Digital Government, <https://www.digg.se/download/18.79c61f7c17db5871992f0b0/1647952779652/handli%20ngsplan-oppna-data.pdf>.

¹¹ Alina Ostling (Open Knowledge Sweden), open letter, 1 November 2021, <https://okfn.se/2021/11/01/open-letter-open-data-priorities-in-sweden/>.

Table of Contents

Section I: Key Observations.....	1
Section II: Implementation and Early Results.....	3
Section III. Participation and Co-Creation.....	5
Section IV. Methodology and IRM Indicators.....	7
Annex I. Commitment Data.....	9

Section I: Key Observations

Observation 1: A lack of political prioritisation on open data impacted implementation

During the implementation period, the government released datasets and created a new open data portal. In the European Data Maturity report, Sweden jumped from 23 out of 28 in 2018 and 2019 to 17 out of 28 in 2021.¹² However, the government did not adopt the draft open data action plan, which was a commitment in this action plan. It would have incorporated ‘open by default’ and ‘open by design’ principles into Swedish law. This shows that an ambitious open data policy is not a political priority in Sweden despite the commitment of policy officers dedicated to this issue within the administration. The limited implementation and the lack of early results stemming from other open data commitments in this action plan demonstrate that the government considers it a low priority to adopt open data policies or seek to ensure they are fully implemented. Sweden could take inspiration from France’s Digital Republic Law, which instituted an ‘open data by default’ principle and set clear priorities to release high-value and high-impact datasets.

Observation 2: The action plan was focused on open data but did not address civil society priorities

There was a lack of iterative dialogue and engagement between government and civil society to co-create commitments for this action plan. As such, while the commitments were relevant to open government, they did not address the priorities of civil society. For example, civil society interviewees mentioned public procurement as a key high-value dataset, although this is not part of the action plan. The current access fees for such high-value datasets, particularly public procurement, are a problem reported by all civil society interviewees. Interviewed public officials noted that even though it is not related to the action plan or OGP process, even the recently-passed public procurement legislation does not address all the challenges of reforming the public procurement ecosystem.¹³ This is why a national open data action plan that would incorporate ‘open by default’ and ‘open by design’ principles into Swedish law would have had notable early results if the government had adopted it. Civil society organisations have also noted that to move from a system where data is sold by authorities to fund their activities to a real open data system, the government must provide a budget to be deployed at the national and local level.¹⁴

The beneficial ownership register is another dataset of great interest to organisations such as Transparency International Sweden, which are not included in the action plan.¹⁵

Observation 3: The lack of structure around Sweden’s OGP process limited engagement between civil society and government, affecting ambition and implementation

OGP Participation and Co-Creation Standards require OGP participating countries to have a Multi-Stakeholder Forum to oversee the co-creation and implementation of action plans. These processes should include meaningful opportunities for civil society to provide input and governments to provide feedback on this input. During implementation, civil society and government should oversee progress and meet to discuss implementation through a Multi-Stakeholder Forum. Sweden did not meet these minimum requirements during the co-creation and implementation periods of this action plan. Formal oversight and accountability for implementation of commitments could have ensured the completion of the action plan commitments, or at least accountability over noncompletion. Having a stable framework and engaged partners during the implementation period would also ease the development of the next action plan, as the engagement process can tap into these already-existing relationships.

Observation 4: Open data activities outside the action plan have seen sustained progress (such as at the local level)

Sweden’s action plan focused on national activities related to open data. However, interviews for this report revealed that activity on open data is also happening at the local level, with the support of the national authorities engaged in OGP. DIGG, for example, has helped develop a community of project officers¹⁶ who have created a platform to engage with open data.¹⁷

Public officials in local authorities have been increasingly involved in open data over the past few years. The Swedish Association of Local Authorities and Regions is also working on open data.¹⁸ A local-level public official suggested that this initiative was a driver for change, although that change is relatively slow.¹⁹ There is room for improvement regarding the technical support that central government could provide to local authorities, especially in municipalities far from the capital city. An open letter from civil society organisation Open Knowledge Sweden suggested that smart cities could speed up the publishing and use of open data in Sweden.²⁰ The open data ecosystem in Sweden operates at both national and local levels, which is something that could be explored and supported in future work in this area.²¹

¹² *Open data maturity 2022, Sweden*, European Commission, https://data.europa.eu/sites/default/files/country-factsheet_sweden_2022.pdf.

¹³ Ulrika Domellöf Mattsson and Kristine Ulander, DIGG, interview by the IRM, 28 November 2022; National Agency for Public Procurement, "Nya upphandlingsregler 1 februari 2022," <https://www.upphandlingsmyndigheten.se/regler-och-lagstiftning/nya-upphandlingsregler/>.

¹⁴ Mattias Axell, Open Knowledge Sweden, interview by the IRM, 6 February 2023.

¹⁵ Lotta Rydstrom, Transparency International Sweden, interview by the IRM, 6 February 2023; Transparency International Sverige, "Verkliga huvudmän - ett verktyg i arbetet mot korruption," YouTube video of event organised by Transparency International Sweden in May 2022 on beneficial ownership transparency, <https://www.youtube.com/watch?v=tbWv9kksg4&t=4s>

¹⁶ NOSAD, <http://nosad.se>.

¹⁷ Sveriges Dataportal, <http://community.dataportal.se>.

¹⁸ Sumbat Daniel Sarkis and Kristine Ulande, interviews by the IRM, October and November 2022; *Connecting the Dots: Data Sharing in the Public Sector*, Capgemini Research Institute, https://prod.ucwe.capgemini.com/wp-content/uploads/2023/01/CRI_Data-Ecosystems-in-Public-Sector_web.pdf.

¹⁹ Maria Soderlind, City of Umea, interview by the IRM, 6 February 2023.

²⁰ Alina Ostling (Open Knowledge Sweden), open letter, 1 November 2021, <https://okfn.se/2021/11/01/open-letter-open-data-priorities-in-sweden/>.

²¹ Swedish regions and municipalities are now indexed in detail in terms of publishing open data or not, and shows level of publishing and coordination is very low in most regions. Region Västra Götaland, Status of work with open data in Sweden's regions, 7 March 2023, https://www.vgregion.se/ov/dataportal-vast/resultatsida/#esc_entry=1727&esc_context=1

Section II: Implementation and Early Results

The following section looks at the commitment that the Independent Reporting Mechanism (IRM) identified as having the strongest results from implementation. To assess early results, the IRM referred to commitments identified as noteworthy in the Design Report as a starting point. After verification of completion evidence, the IRM also took into account commitments that were not determined as noteworthy but that, as implemented, yielded significant results.

Commitment 2: Make open data that can best benefit society available

Agency for Digital Government

Context and Objectives

Sweden scores average in international open data rankings. Sweden stood second-to-last in the Organisation for Economic Co-operation and Development (OECD) OurIndex 2019 ranking.²² The OECD has also pointed out that Sweden tends to prefer isolated projects rather than a countrywide consistent strategy.²³

As described in the original commitment, the Agency for Digital Government (DIGG) held workshops in 2019 with nongovernment stakeholders about the new open data portal.²⁴ According to civil society organisations, these discussions had limitations because the government had already set out the five priority thematic areas to be included in the portal:²⁵ The main achievement under this commitment was the launch in 2020 of a new centralised data portal (www.dataportal.se), which replaced a previous website that has now been shut down (opnadata.se).

The five topic areas were traffic, labour market, health, geodata, and open research. Under ‘Traffic’, the ‘transport’ section in the data portal hosts more than a hundred datasets, published mostly by local authorities. Transport is a rare example of a reuse of data mentioned in the (non-tech) media.²⁶ There are currently around 1,000 published datasets related to the labour market, in the ‘Population and society’ category. There is a dedicated section in the data portal related to health. The provision of geodata has substantially improved, in line with the entry into force of the EU directive on open data in the public sector in July 2019.²⁷ However, business organisations continue to advocate for swift implementation in full of the directive.²⁸ The Swedish Research Council has started a plan towards open research, to be achieved in 2026.²⁹

These priorities, however, are disconnected from international assessments of gaps in open data in Sweden, which notably highlight deficiencies in open data related to land ownership, government spending, and public procurement.³⁰

Did It Open Government? Marginal

The number of datasets available on the new portal more than tripled between March 2020 and December 2021, when it reached 7,700 datasets.³¹ The available formats usually include JSON or XML. In a case of reuse, the industry association Transportföretagen used the Transport Administration’s open data (on cracking, rutting depth, and the expected time between two maintenance operations) to publicly reveal that almost 13% of the Swedish road network is in very poor condition.³² This shows how the information on the new data portal has led to notable steps forward in advancing open data and its reuse in Sweden.

Despite this progress, Sweden remains the lowest-rated country in the last Capgemini Research Institute assessment, with only 19% of public sector organisations having deployed or currently deploying data ecosystems.³³ In the Global Data Barometer, an international civil society initiative to assess the quality of open data, Sweden is among the lowest-ranked EU countries in the 2022 assessment.³⁴ A civil society representative also commented³⁵ that open data is seen as an economic and growth issue, so the government prioritises data with economic potential, such as transportation and mobility datasets. From this civil society perspective, the government also needs to prioritise political integrity data and public procurement data.

Looking Ahead

The government will need to ensure it continues to allocate resources to maintain the data portal beyond the life of this action plan cycle. As promised in the commitment, DIGG could organise regular and structured dialogue with current and potential users of open data to co-construct priorities in opening up data. Participants should have a clear understanding of how their input is used (or not). Promotional events or workshops could also encourage the reuse of data released via the portal. Furthermore, the government, DIGG, and local authorities could use Freedom of Information requests to identify people's data needs.

The release of procurement data and the construction of a centralised public open data platform for procurement remains a priority for civil society that government could look to address. In relation to this, the national procurement authority had started to publish a statistical tab on its website,³⁶ which could serve as a starting point for future commitments in Sweden's next action plan. While data is currently not downloadable, the national procurement authority could look at publishing information as open data.

²² OECD *Open, Useful and Re-usable data (OURdata) Index: 2019*, OECD, <https://www.oecd.org/governance/digital-government/ourdata-index-policy-paper-2020.pdf>.

²³ OECD, *Digital Government Review of Sweden*, 10 May 2019, p. 110, <https://www.oecd-ilibrary.org/docserver/f1b77740-en.pdf?expires=1599773456&id=id&accname=quest&checksum=28C563B1C64794B666A8FCE9460C372B>.

²⁴ Pierre Mesure, "Five ideas for Sweden's new open data portal", Medium, September 2019, <https://medium.com/civitechsweden/5-ideas-for-swedens-new-open-data-portal-d47beb65ec5f>.

²⁵ Some workshops were organised in 2019, but civil society expressed frustration. Pierre Mesure, "Five ideas for Sweden's new open data portal", Medium, September 2019, <https://medium.com/civitechsweden/5-ideas-for-swedens-new-open-data-portal-d47beb65ec5f>.

²⁶ "The industry association Transportföretagen notes that almost 13% of the state road network is in very poor condition. The organisation has calculated this using the Transport Administration's open data on cracking, rutting depth and the expected time between two maintenance operations". "Branschen kritisk – många vägar i dåligt skick [The industry is critical – many roads in poor condition]", *Göteborgs-Posten*, 26 January 2021, <https://www.gp.se/nyheter/sverige/branschen-kritisk-m%C3%A5nga-v%C3%A4gar-i-d%C3%A5ligt-skick-1.40475275>.

²⁷ "Karttjänster och geodata [Map services and geodata]", Västra Götaland Administrative Board, <https://www.lansstyrelsen.se/vastra-gotaland/om-oss/vara-tjanster/karttjanster-och-geodata.html>.

²⁸ "Glädjande besked om öppna data [Good news about open data]", Geoforum Sverige, 25 January 2023, <https://geoforum.se/nyheter/266-oppna-data/4317-glaedjande-besked-om-oppna-data>.

²⁹ "The way towards open access to research data", Swedish Research Council, 9 April 2020 (updated 14 December 2022), <https://www.vr.se/english/mandates/open-science/open-access-to-research-data/the-way-towards-open-access-to-research-data.html>.

³⁰ "Sweden," Global Open Data Index, <http://index.okfn.org/place/se.html>.

³¹ Statistics, Sveriges Dataportal [Sweden Open Data Portal], <https://www.dataportal.se/en/statistics>.

³² "Branschen kritisk – många vägar i dåligt skick [The industry is critical – many roads in poor condition]", *Göteborgs-Posten*, 26 January 2021, <https://www.gp.se/nyheter/sverige/branschen-kritisk-m%C3%A5nga-v%C3%A4gar-i-d%C3%A5ligt-skick-1.40475275>.

³³ *Connecting the Dots: Data Sharing in the Public Sector*, Capgemini Research Institute,

https://prod.ucwe.capgemini.com/wp-content/uploads/2023/01/CRI_Data-Ecosystems-in-Public-Sector_web.pdf.

³⁴ "The Global Data Barometer Report," Global Data Barometer, <https://globaldatabarometer.org/the-global-data-barometer-report-first-edition/>.

³⁵ Pierre Mesure, Civic Tech Sweden, interview by the IRM, 20 January 2023.

³⁶ "Statistiktjänsten [Statistics Service]," National Agency for Public Procurement, <https://www.upphandlingsmyndigheten.se/statistik/>.

Section III. Participation and Co-Creation

There was very limited dialogue with civil society during the co-creation process, and this did not improve over the period of implementation. During implementation, engagement with civil society was limited to what was promised in the context of developing commitments. There was no oversight of the action plan with civil society. There was no Multi-Stakeholder Forum established, nor was there a functioning repository, nor published information about progress on action plan implementation.

The Ministry of Infrastructure oversees the OGP process in Sweden. Three commitments out of four were under the responsibility of the Agency for Digital Government. There was no change in OGP leadership during the action plan cycle.

During co-creation, an independent digital consultant with limited oversight by the Ministry produced a final report that formed the basis of the action plan's content. As part of the process, the consultant circulated a survey to civil society stakeholders. While no reasoned response was provided to stakeholders on their input, the report notes that those insights and other insights from an OECD report informed the inclusion of certain activities in the action plan. The action plan also lists four other events that were held, but it is unclear how they influenced the final action plan. The IRM Design Report outlines that, according to one civil society representative interviewed by the consultant during the development of the action plan, civil society was largely not involved in the development of the action plan and commitments were included because the Ministry of Infrastructure and DIGG had already planned to pursue the activities. This points to a lack of iterative dialogue between government and civil society, and that nongovernment members were unable to set the co-creation agenda. Sweden acted contrary to the OGP process during co-creation.

During the implementation period, civil society interviewees³⁷ said there was very little engagement with government on the OGP process or oversight of progress. In the absence of a Multi-Stakeholder Forum, nongovernmental actors were only involved informally or via one-off events with little or no follow-up. The government organised a few events with the civic tech community, but this collaboration was not specifically related to oversight of the action plan. A public official confirmed that, even though Commitment 3 was about fostering data-driven collaboration with civil society, there were no projects between government and civil society that started up after these activities.³⁸

There was no online repository or webpage dedicated to the OGP on the government website. The IRM has been unable to find information directly related to OGP on government websites. There are a limited number of published press articles on open data public policies (related to OGP commitments), but none mentioning the OGP process or the OGP action plan.³⁹

Compliance with the Minimum Requirements

The IRM assesses whether member countries met the minimum requirements under OGP's Participation and Co-Creation Standards for the purposes of procedural review. During co-creation, Sweden did not act according to the OGP process.⁴⁰ The two minimum requirements listed below must achieve at least the level of 'in progress' for a country to have acted according to OGP process.

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

Acted according to OGP process during the implementation period?	
<p>The government maintained an OGP repository that is online, updated at least once during the action plan cycle, and contains evidence of development and implementation of the action plan. There was a dedicated OGP page on the government website. However, during the implementation period the webpage did not contain evidence for the implementation of at least one commitment and did not meet the minimum requirement for regular updates.</p>	Red
<p>The government provided the public with information on the action plan during the implementation period. There was no government information available about implementation of the action plan, nor is there a link to download the action plan from the government website. There was some limited information in the media about the launch of the new open data portal, but it would not be clear to readers that this had anything to do with OGP.</p>	Red

³⁷ Pierre Measure, Matthias Axell, Lotta Rydstrom, interviews by the IRM, January and February 2023.

³⁸ Sumbat Daniel Sarkis, Ministry of Infrastructure, interview by the IRM, 24 October 2022.

³⁹ Press review conducted by researcher, using press databases. For example, "Öppen data för Sverige [Open Data in Sweden]", Voister (a tech-oriented media outlet), 14 April 2020, <https://www.voister.se/artikel/2020/04/oppen-data-for-sverige/>. There have been some blog posts and articles on business organisations' websites. For example: "Kristine Ulander, DIGG om Sveriges nya dataportal [Kristine Ulander, DIGG, about Sweden's new data portal," TechSverige, 21 September 2020, <https://www.techsverige.se/2020/09/kristine-ulander-digg-om-sveriges-nya-dataportal/>.

⁴⁰ IRM, "Sweden Design Report 2019-2021", 4 January 2021, <https://www.opengovpartnership.org/documents/sweden-design-report-2019-2021/>.

Section IV. Methodology and IRM Indicators

This report supports members' accountability and learning through assessment of (i) the level of completion for commitments' implementation, (ii) early results for commitments with a high level of completion identified as promising or that yielded significant results through implementation, and (iii) participation and co-creation practices throughout the action plan cycle.⁴¹ The IRM commenced the research process after the first year of implementation of the action plan with the development of a research plan, preliminary desk research, and verification of evidence provided in the country's OGP repository.⁴²

In 2022, OGP launched a consultation process to co-create a new strategy for 2023–2028.⁴³ The IRM will revisit its products, process, and indicators once the strategy co-creation is complete. Until then, Results Reports continue to assess the same indicators as previous IRM reports:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.⁴⁴ The level of completion for all commitments is assessed as one of the following:

- *No evidence available*
- *Not started*
- *Limited*
- *Substantial*
- *Complete*

Did It Open Government?

The IRM assesses changes to government practices that are relevant to OGP values, as defined in the OGP Articles of Governance, under the “Did it open government?” indicator.⁴⁵ To assess evidence of early results, the IRM refers to commitments or clusters identified as promising in the Action Plan Review as a starting point. The IRM also takes into account commitments or clusters with a high level of completion that may not have been determined as “promising” but that, as implemented, yielded significant results. For commitments that are clustered, the assessment of “Did it open government?” is conducted at the cluster level, rather than the individual commitment level. Commitments or clusters without sufficient evidence of early results at the time of assessment are designated as “no early results to report yet.” For commitments or clusters with evidence of early results, the IRM assesses “Did it open government?” as one of the following:

- *Marginal*: Some change, but minor in terms of its effect on level of openness
- *Major*: A step forward for government openness in the relevant policy area but remains limited in scope or scale
- *Outstanding*: A reform that has transformed “business as usual” in the relevant policy area by opening government

This report was prepared by the IRM in collaboration with Elsa Foucraut and was reviewed by Ernesto Velasco Sanchez, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM's International Experts Panel (IEP). The current IEP membership includes:

- Snjezana Bokulic
- Cesar Cruz-Rubio
- Mary Francoli
- Maha Jweied
- Rocio Moreno Lopez

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual⁴⁶ and in Sweden’s 2019-2021 Design Report.⁴⁷ For more information, refer to the “IRM Overview” section of the OGP website, available [here](#).

⁴¹ For definitions of OGP terms, such as co-creation and promising commitments, see “OGP Glossary”, <https://www.opengovpartnership.org/glossary/>.

⁴² Sweden does not have a repository.

⁴³ See OGP, “Creating OGP’s Future Together: Strategic Planning 2023–2028”, <https://www.opengovpartnership.org/creating-ogps-future-together/>.

⁴⁴ The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “potential for results” and “Did it open government?” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology and IRM Indicators of the Action Plan Review.

⁴⁵ See OGP, *Open Government Partnership Articles of Governance*, 17 June 2019,

https://www.opengovpartnership.org/wp-content/uploads/2019/06/OGP_Articles-of-Governance_2019.pdf.

⁴⁶ Independent Reporting Mechanism, *IRM Procedures Manual*, V.3, 16 September 2017,

<https://www.opengovpartnership.org/documents/irm-procedures-manual>.

⁴⁷ IRM, “Sweden Design Report 2019-2021”, 4 January 2021, <https://www.opengovpartnership.org/documents/sweden-design-report-2019-2021/>.

Annex I. Commitment Data

Commitment 1: A national open data action plan

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential impact: Moderate | <ul style="list-style-type: none"> • Completion: Limited • Did it open government? No evidence of early results |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|

The Agency for Digital Government (DIGG) published a draft open data action plan,⁴⁸ but the government did not formally adopt it and it has therefore not been implemented further. The reasons why the adoption process was not completed remain unclear, although civil society interviewees mentioned a lack of political leadership and willingness to push to adopt the plan.⁴⁹ The OECD has previously pointed out that Sweden tends to prefer isolated projects rather than a countrywide consistent strategy,⁵⁰ which might also feed into why top-down guidelines (such as a national open data action plan) by central government are not common in Swedish political tradition.⁵¹

The weaknesses of open data in Sweden are recognised in the introduction of the plan, with references to OECD criticisms. Promising components include developing ‘open by default’ and ‘open by design’ principles, the removal of access fees to high-value datasets, and a request to all public administrations to report on their progress regarding open data. In general, the proposal calls for a clearer governance by granting DIGG a leading role. However, much of the wording remains vague. In several cases, ‘proposed actions’ consist of asking the government to ‘encourage’ or ‘consider’ relevant public policies.

The consultation process behind the open data action plan was mostly informal, limited to what public officials called ‘ongoing dialogue’⁵² with potential data users. Civil society interviewees stated that they were not consulted and that they have not observed any significant change⁵³ (in some cases mentioning that they have barely heard of this plan). Transparency International Sweden continues to recommend Sweden adopt an ‘open data by default’ approach, potentially indicating limited impact of the draft action plan so far.⁵⁴

Commitment 2: Make open data that can best benefit society accessible

- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential impact: Minor | <ul style="list-style-type: none"> • Completion: Complete • Did it open government? Marginal |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|

This commitment’s implementation and early results are assessed in Section II above.

Commitment 3: Promote capacity and data-driven innovation in collaboration between research, business and civil society

- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential impact: Minor | <ul style="list-style-type: none"> • Completion: Limited • Did it open government? No evidence of early results yet |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|

The government organised two ‘Hack for Sweden events’ in 2019 and 2021, fewer than the five events outlined in Sweden’s Design Report.⁵⁵ Although these events were indeed organised, the website created to foster pilot activities (challengesgov.se) is now shut down.⁵⁶ As with other commitments in this action plan, the manner of implementation has reflected a tendency to run initiatives as time-limited projects, with a start and an end, rather than reflecting a more overarching, long-term, and sustainable policy perspective. According to civil society interviewees, the impact of those events was limited, and they were not designed to be game-changing.⁵⁷ In addition to those events organised by DIGG, the government financially supported initiatives by civil society organisations such as the Open Up project,⁵⁸ organised by Civic Tech Sweden and Open Knowledge Sweden.

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

- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential impact: Minor | <ul style="list-style-type: none"> • Completion: Limited • Did it open government? No evidence of early results yet |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|

According to a public official from the Ministry of Infrastructure, this commitment was not fully completed.⁵⁹ The government organised a civil society event in 2019; nongovernment organisations including the Red Cross and Save the Children participated, a sign that the events targeted a broader spectrum of civil society beyond civic tech. A second event was held in 2022 (although it was online only) that was oriented towards civic tech organisations and businesses. This is less than the two events per year outlined in the commitment. The government acknowledges that there was no specific follow-up to these events and there are no examples of projects that have sprung from these events.⁶⁰

⁴⁸ Förslag till handlingsplan för tillgängliggörande och vidareutnyttjande av öppna data [Proposal for an action plan for making available and reusing open data], Agency for Digital Government, <https://www.digg.se/download/18.79c61f7c17db5871992f0b0/1647952779652/handli%20ngsplan-oppna-data.pdf>.

⁴⁹ Pierre Mesure, Civic Tech Sweden, interview by the IRM, 20 January 2023; Mattias Axell, Open Knowledge Sweden, interview by the IRM, 6 February 2023.

⁵⁰ OECD Digital Government Review of Sweden, quoted in IRM, “Sweden Design Report 2019-2021”, 4 January 2021, <https://www.opengovpartnership.org/documents/sweden-design-report-2019-2021/>.

⁵¹ Delna and Open Knowledge Sweden, “Open data and the fight against corruption in Latvia, Sweden and Finland”, p. 20, http://delna.lv/wp-content/uploads/2018/11/OD4AC_SE_Final6.pdf.

⁵² Ulrika Domellöf Mattsson and Kristine Ulander, DIGG, interview by the IRM, 28 November 2022.

⁵³ Pierre Mesure, Mattias Axell, Lotta Rydström, interviews by the IRM.

⁵⁴ Lotta Rydström, Transparency International Sweden, interview by the IRM, 6 February 2023.

⁵⁵ IRM, “Sweden Design Report 2019-2021”, 4 January 2021, <https://www.opengovpartnership.org/documents/sweden-design-report-2019-2021/>.

⁵⁶ Kristine Ulander, interview by the IRM, November 2022. The website challengesgov.se can be accessed via Archive.org; see example: <https://web.archive.org/web/20211202092358/https://challengesgov.se/>.

⁵⁷ Pierre Mesure, co-founder of Civic Tech Sweden and an organiser of the Open Up event, interview by the IRM, 20 January 2023.

⁵⁸ “Om oss [About Us]”, Open Up!, Open Knowledge Sweden, <https://openup.okfn.se/om-oss/>.

⁵⁹ Sumbat Daniel Sarkis, Ministry of Infrastructure, interview by the IRM, 24 October 2022.

⁶⁰ Sumbat Daniel Sarkis, Ministry of Infrastructure, interview by the IRM, 24 October 2022.