

# Independent Reporting Mechanism

Action Plan Review:  
Denmark 2023-2025

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

## Introduction

In January 2021, the Independent Reporting Mechanism (IRM) rolled out the new products that resulted from the IRM Refresh process.<sup>1</sup> The new approach builds on the lessons learned after more than 350 robust, independent, evidence-based assessments conducted by the IRM and inputs from the OGP community. The IRM seeks to put forth simple, timely, fit for purpose, and results-oriented products that contribute to learning and accountability in key moments of the OGP action plan cycle.

IRM products are:

- **Co-Creation Brief:** Brings in lessons from previous action plans, serves a learning purpose, and informs co-creation planning and design.
- **Action Plan Review:** A quick, independent technical review of the characteristics of the action plan and the strengths and challenges IRM identifies to inform a stronger implementation process.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning. This product was rolled out in a transition phase in 2022, beginning with action plans ending implementation on 31 August 2022. Results Reports are delivered up to four months after the end of the implementation cycle.

This product consists of an IRM review of the Danish 2023-2025 action plan. The action plan comprises five commitments. This review emphasizes its analysis on the strength of the action plan to contribute to implementation and results. For the commitment-by-commitment data, see Annex 1. For details regarding the methodology and indicators used by the IRM for this Action Plan Review, see Section III.

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<sup>1</sup> IRM Refresh: <https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/>

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## Section I: Overview of the 2023-2025 Action Plan

*Denmark's fifth action plan focuses on civic participation, digital innovation, and open data. Most of the commitments started before the action plan with modest potential to stretch existing practices. The Agency for Digital Government should ensure that Denmark meets OGP's Participation and Co-Creation Standards during implementation through regular dialogue with civil society and reporting on the progress of the action plan.*

Denmark's fifth action plan includes commitments from a range of government agencies and levels of government. Compared to the previous action plan, the fifth plan places more focus on civic participation. The action plan continues Denmark's focus on open data and digitalization, with commitments to strengthen the health sector using voluntarily-generated behavioral data (DataDonor) and to provide easier access to public data for researchers, businesses, and civil society (National Data Portal).

The co-creation process began with an open call for proposals in September 2022. After the announcement of parliamentary elections in autumn 2022, the Agency for Digital Government (AfDG) postponed the multi-stakeholder forum (MSF) meeting from October 2022 to January 2023, until after a new government was formed and parliamentary work resumed.<sup>2</sup> During the meeting in January 2023, the MSF members (civil society and government agencies) discussed the proposals and agreed on the initiatives for the action plan.<sup>3</sup> After the meeting, the AfDG drafted the initiatives into the commitments with the lead agencies and shared them with civil society for further comments. A participating stakeholder noted that one online hearing and one meeting were insufficient for in-depth involvement in the co-creation process or for stakeholders to understand the opportunities and limitations of the process.<sup>4</sup>

Many activities in the action plan were already in progress before the plan's start (June 2023). The need to postpone the co-creation process until after the autumn 2022 elections made it difficult for the co-creation process to significantly affect the scope of the commitments. Moreover, Denmark's OGP action plans are not supported by specific budgetary allocations, so only initiatives with established funding are included as commitments.<sup>5</sup> Interviewed civil society representatives expressed that there is limited interest in the OGP process because there is no possibility to include new initiatives and the lack of political involvement.<sup>6</sup> The latter could be addressed by developing a political strategy for civic participation and open government.<sup>7</sup> Furthermore, to increase interest in future action plans, the AfDG could organize more opportunities for participation in the co-creation process and keep the process open for longer. The AfDG could also increase its outreach by sharing information on the OGP process on social media and in newsletters, and through direct engagement with civil society networks.

### AT A GLANCE

**Participating since:** 2011  
**Action plan under review:** 2023–2025  
**IRM product:** Action Plan Review  
**Number of commitments:** 5

**Overview of commitments:**  
Commitments with an open government lens: 3 (60%)  
Commitments with substantial potential for results: 0  
Promising commitments: 1

**Policy areas:**  
Carried over from previous action plans:

- Open data

Emerging in this action plan:

- Digital self-services
- Participation in state-owned nature areas
- Participation in regional development

**Compliance with OGP minimum requirements for co-creation:** No

The IRM has identified Commitment 5 on the National Data Portal as the most promising. This commitment will provide users with a single access point for data from the public sector. During implementation, the AfDG could develop a strategy to engage civil society in improving the user experience of the Data Portal.

The AfDG should ensure Denmark's compliance with OGP's Participation and Co-Creation Standards during implementation. This will entail organizing at least two meetings with civil society every year to present the status of the commitments and collect comments. The AfDG should also update Denmark's OGP repository with evidence of implementation, as there was no systematic reporting on the previous action plan (2019-2022).

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<sup>2</sup> The announcement came earlier than the normal four-year cycle of national elections in Denmark, so the AfDG had to adjust the co-creation timeline to take the elections into account. See Folketinget, "Hvad sker der med Folketingets arbejde, når der er udskrevet valg?", accessed 23 November 2023, [https://www.ft.dk/da/ofte-stillede-spoergsmaal/valg\\_ftarb\\_hvad-sker-der-med-folketingets-arbejde-naar-der-er-udskrevet-valg](https://www.ft.dk/da/ofte-stillede-spoergsmaal/valg_ftarb_hvad-sker-der-med-folketingets-arbejde-naar-der-er-udskrevet-valg)

<sup>3</sup> Danish Agency for Digitisation, OGP network meetings, <https://digst.dk/strategier/internationalt-samarbejde/open-government/ogp-netvaerksmoeder/>

<sup>4</sup> Bjørn Bedsted (Danish Board of Technology), interview by the IRM, 20 October 2023.

<sup>5</sup> Leander Wiesheu (PoC, Agency for Digital Government), interview by the IRM, 30 October 2023.

<sup>6</sup> Bjørn Bedsted (Danish Board of Technology), interview by the IRM, 20 October 2023, and with Søren Kirk Jensen (Independent Policy Analysis), 30 October 2023.

<sup>7</sup> Søren Kirk Jensen (Independent Policy Analysis), interview by the IRM, 25 October 2023, and interview with Transparency International Denmark during the Results Report for the action plan 2019-2022 (Results Report: Denmark 2019-2022, [https://www.opengovpartnership.org/wp-content/uploads/2023/07/Denmark\\_Results-Report\\_2019-2022\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/07/Denmark_Results-Report_2019-2022_EN.pdf))

## Section II: Promising Commitments in Denmark 2023-2025 Action Plan

The following review looks at the one commitment that the IRM identified as having the potential to realize the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens, and have modest or substantial potential for results. This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of this action plan.

**Table 1. Promising commitments**

Promising Commitments
<b>Commitment 5: National Data Portal.</b> The National Data Portal will establish one entry point to access for researchers, private sector, and citizens.

### **Commitment 5: National Data Portal**

Agency for Digital Government

For a complete description of the commitment, see Commitment 5 in Denmark's 2023-2025 action plan [here](#).

### **Context and objectives**

The National Data Portal (Datavejviser) was developed partly based on a proposal from the Danish Government Digitization Partnership to make it easier for citizens and businesses to find and create value from public data.<sup>8</sup> It was launched in September 2022 and was included in the action plan during the co-creation meeting in January 2023.<sup>9</sup> The National Data Portal presents metadata but not the data itself; it is an entry point directing users to the source of their requested data. It initially focused on national level data, but after the positive reaction from the public, it was expanded to cover regional and municipal data.<sup>10</sup> Denmark is working to increase digital growth, and the National Data Portal is one of several initiatives to increase the quality of digital services.<sup>11</sup>

The platform and guidelines for data owners were developed before the action plan (September 2022 to March 2023).<sup>12</sup> During the action plan cycle, the AfDG will continue expanding the data covered by the National Data Portal using a demand driven approach.<sup>13</sup> The commitment also involves knowledge sharing with other data distributors and dialogue with potential users to identify new areas of data on the National Data Portal and how to integrate the platform into other organizations' data catalogues.<sup>14</sup> According to the AfDG, these activities will be carried out in cooperation with specialist organizations, like Open Data DK,<sup>15</sup> and at events, like the Danish digitalization exhibition.<sup>16</sup> The AfDG has already organized activities with Open Data DK<sup>17</sup> and will continue with different themes throughout the implementation period. The next activity is about open satellite data.<sup>18</sup> This commitment is relevant to the open government values of transparency and civic participation as it will increase access to public data and involves consulting users in exploring their needs in data for the National Data Portal.

### **Potential for results: Modest**

Since the National Data Portal already exists, with more than 3,000 datasets available from 38 entities, this commitment represents a modest change to the accessibility of public data.<sup>19</sup> The commitment lead at the AfDG notes that the AfDG values the quality of metadata over quantity, with the goal to provide value with the data and easier access.<sup>20</sup> The National Data Portal harvests metadata from Danish data distributors where possible, for example Statistics Denmark's Statistikbanken and the Danish Geodata Portal, geodata-info.dk.<sup>21</sup> In turn, the National Data Portal can indeed be harvested by, for example, the official data portal of the European Commission.<sup>22</sup>

The National Data Portal will improve the quality of metadata connected to datasets. While large organizations often already have a policy in place, the National Data Portal can assist smaller organizations in developing the right integrated set-up to ensure their metadata is accurate, searchable, updated regularly, and in line with international standards of data governance. For smaller organizations, the National Data Portal has developed a system where the owners can input their metadata and the National Data Portal checks that it is not outdated.<sup>23</sup> Moreover, when the department working with the National Data Portal sees interest in publishing data that may contain sensitive or personal information, such as energy use in buildings, they work with the owner to publish aggregated or anonymized data.<sup>24</sup>

Public agencies and business associations foresee increased growth and innovation when researchers and companies have easier access to public data through the National Data Portal.<sup>25</sup> For example, the Danish Board of Technology expects that environmental CSOs will be particularly interested in easier access to public discharge data for their work.<sup>26</sup> The National Data Portal can also improve the quality of case management for civil servants because cross-sectional public data will become simpler to access.<sup>27</sup>

### **Opportunities, challenges, and recommendations during implementation**

The product is already live and the AfDG already has guidelines and work processes in place for including more data partners. The financial support to National Data Portal from the Finance Act 2022 (Finansloven) is earmarked for this purpose until 2025.<sup>28</sup> Moreover, Directive (EU) 2019/1024 gives Denmark an economic and regulatory incentive to continue funding the National Data Portal beyond the action plan period.

The IRM recommends the following steps during implementation of this commitment:

- **Build on the current momentum by increasing partnerships with public sector data owners.** This could entail deepening collaboration with Open Data DK to bring more attention to the National Data Portal at the regional and municipal levels and to make it more relevant and useful to citizens.<sup>29</sup>
- **Share best practices with the public.** The National Data Portal already has guidelines and a system to ensure high quality metadata of the published datasets. Sharing best practices would contribute to better governance and higher data quality across sectors.
- **Measure the use of the product.** The AfDG has seen a growing use of public data but acknowledges that there is a challenge in measuring the success of the National Data Portal.<sup>30</sup> Since the product directs users to the relevant data source, the National

Data Portal is not credited in final publications or use cases. Additionally, the portal [datavejviser.dk](http://datavejviser.dk) is harvestable by other data distribution sources, making web traffic unreliable as a success indicator. The AfDG could take a qualitative approach where the value of the platform is assessed in cooperation among users. The IRM recommends tracking the outcomes of future dialogues with users and the trends in downloads for each dataset. For a quantitative approach, the AfDG could track Denmark's score in the European Digital Economy and Society Index (DESI) after implementation to see if the National Data Portal has contributed to a change in digital public service availability.<sup>31</sup> The Ministry for Digitalization and Gender Equity mentioned the National Data Portal is one initiative to improve Denmark's score for the indicator "open public data" in which it ranked 11<sup>th</sup> in 2022.<sup>32</sup> However, the National Data Portal is not the only relevant initiative and its effect on the DESI score can be challenging to measure.

- **Develop a strategy for civil society engagement.** The focus has so far been on involving businesses as users and the public sector as data providers, but there may also be interest in the platform among civil society.<sup>33</sup> The Danish Board of Technology suggests inviting CSOs for sessions to discuss how the National Data Portal can accommodate their needs. CSOs need at least two consecutive meetings to allow for reflections on the first information before making final decisions.<sup>34</sup>

## Other commitments

Other commitments that the IRM did not identify as promising commitments are discussed below. This review provides recommendations to contribute to the learning and implementation of these commitments.

Commitment 1 involves launching an automated chatbot and voicebot for digital self-services in municipalities (Digital Hotline MUNI). The voicebot is expected to be operational in 37 municipalities in 2024. It aims to help citizens with limited digital skills, like the elderly, have easier access to municipal services and reduce the need to visit service centers. The commitment lacks a clear open government lens because it does not clearly make a policy area, institution or decision-making process more transparent, participatory or accountable to the public. To strengthen the commitment's open government lens, the IRM recommends consulting CSOs representing elderly citizens such as DaneAge Association (Ældresagen) when launching the voicebot to understand the needs of this group for digital services.

Under Commitment 2, the Danish Nature Agency will establish local committees for state-owned nature areas. The committees will consist of stakeholders with an interest in outdoor recreation, nature conservation, and tourism. Although the commitment began in January 2023, it is a continuation of previous committees with only minor changes in their set-up and activities. Moreover, the action plan is vague on the purpose of the committees beyond facilitating dialogue between stakeholders and the the Danish Nature Agency and creating a framework for outdoor recreation that takes users' preferences into account. Therefore, the IRM considers the commitment to have unclear potential for results.

Under Commitment 3, the Region of Southern Denmark will facilitate dialogue with citizens on a range of regional development projects through public meetings and outreach forums. Examples of topics for citizen input include improving local hospitals and the Regional



Development Strategy 2024–2027. The commitment also entails continuous evaluation of these dialogues. The IRM recommends embedding these dialogue mechanisms into the work of the regional government beyond the action plan period and expanding to additional topics. It will be important for the regional government to document the input received and report back to citizens on how their input was considered. Lastly, the regional government could facilitate learning with other Danish regions in conducting successful consultations with citizens.

Under Commitment 4, the Region of Southern Denmark will continue improving the DataDonor platform, which allows citizens to voluntarily donate their health data with informed consent and data transparency.<sup>35</sup> The AfDG notes that the commitment aims to promote public discourse and awareness of transparency issues relating to data, data security and data ethics through educational initiatives on these topics. The commitment has limited targets such as developing three new project applications with a research institution and three new projects with private companies as well as reaching 2,500 users by June 2025. The commitment lacks a clear open government lens, as it is unclear how the changes to DataDonor will increase transparency in the use of citizens' health data. The commitment could benefit from engaging established CSOs to reflect on what groups should be targeted for donating their data to the platform.

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<sup>8</sup> The Danish Government Digitisation Partnership, October 2021, Visions and recommendations for Denmark as a digital pioneer, accessed 9 October 2023, <https://en.digst.dk/media/24796/visions-and-recommendations-for-denmark-as-a-digital-pioneer-danish-government-digitisation-partnership.pdf>

<sup>9</sup> Nikolai Bülow Tronche (commitment lead, Agency for Digital Government), interview by the IRM, 24 October 2023.

<sup>10</sup> Nikolai Bülow Tronche (commitment lead, Agency for Digital Government), interview by the IRM, 24 October 2023.

<sup>11</sup> Ministry of Digital Government and Gender Equality, April 2023, Redegørelse om Danmarks Digitale Vækst, accessed 10 October 2023, <https://www.ft.dk/samling/20222/almdel/diu/bilag/75/2696641.pdf>

<sup>12</sup> Agency for Digital Government, June 2023, Open Government Partnership National Handlingsplan Plan 2023-2025, accessed 10 October 2023, <https://digst.dk/media/28909/ogp-handlingsplan-2023-2025.pdf>

<sup>13</sup> Danish Business Regulation Forum, 15 December 2020, Recommendation 55: A National Data Strategy, accessed 10 October 2023, <https://regelforum.dk/anbefalinger/en-national-datastrategi>

<sup>14</sup> Nikolai Bülow Tronche (commitment lead, Agency for Digital Government), interview by the IRM, 24 October 2023.

<sup>15</sup> Open Data DK is an association that advises Danish municipalities, regions, and other agencies on displaying public data.

<sup>16</sup> Nikolai Bülow Tronche (commitment lead, Agency for Digital Government), interview by the IRM, 24 October 2023.

<sup>17</sup> Open Data DK, Webinar: Hvilke muligheder giver DataVejviser?, 30 August 2023, <https://www.opendata.dk/blog/webinar-hvilke-muligheder-giver-datavejviser>

<sup>18</sup> Open Data DK, Webinar: Anvend åbne satellitdata, 13 November 2023, <https://www.opendata.dk/blog/webinar-anvend-aaabne-satellitdata>

<sup>19</sup> Data Roadmap (Datavejviser), accessed 10 October 2023, <https://www.datavejviser.dk/>

<sup>20</sup> Nikolai Bülow Tronche (commitment lead, Agency for Digital Government), interview by the IRM, 24 October 2023.

<sup>21</sup> The Danish Agency for Data Supply and Infrastructure, The Data Distribution Platform, accessed 30 October 2023, <https://eng.sdfi.dk/data/datadistribution/the-data-distribution-platform>

<sup>22</sup> European Commission, data.europa.eu - The official portal for European data, accessed 30 October 2023; <https://data.europa.eu/en>

<sup>23</sup> Nikolai Bülow Tronche (commitment lead, Agency for Digital Government), interview by the IRM, 24 October 2023.

<sup>24</sup> Nikolai Bülow Tronche (commitment lead, Agency for Digital Government), interview by the IRM, 24 October 2023.

<sup>25</sup> The Danish Government Digitisation Partnership, Ministry of Digital Government and Gender Equality, and Danish Business Regulation Forum, Danish Industry to name a few; Danish Industry, 2023, AI for alle, accessed 10 October 2023, [https://www.danskindustri.dk/globalassets/digitalisering/diverse/di\\_aiforalle.pdf?v=230924](https://www.danskindustri.dk/globalassets/digitalisering/diverse/di_aiforalle.pdf?v=230924)

<sup>26</sup> Børn Bedsted (Danish Board of Technology), interview by the IRM, 20 October 2023.

<sup>27</sup> Agency for Digital Government, June 2023, Open Government Partnership National Handlingsplan Plan 2023-2025, accessed 10 October 2023, <https://digst.dk/media/28909/ogp-handlingsplan-2023-2025.pdf>

<sup>28</sup> The Ministry of Finance, Økonomioversigt for initiativer i regeringens Digitaliseringsstrategi, accessed 30 October 2023, [https://fm.dk/media/25989/faktaark\\_oekonomioversigt-for-initiativer-i-regeringens-digitaliseringsstrategi\\_a.pdf](https://fm.dk/media/25989/faktaark_oekonomioversigt-for-initiativer-i-regeringens-digitaliseringsstrategi_a.pdf)

<sup>29</sup> Open Data DK, 30 August 2023, Webinar: Hvilke muligheder giver Datavejviser?, accessed 12 October 2023, <https://www.opendata.dk/blog/webinar-hvilke-muligheder-giver-datavejviser>

<sup>30</sup> Nikolai Bülow Tronche (commitment lead, Agency for Digital Government), interview by the IRM, 24 October 2023.

<sup>31</sup> Ministry of Digital Government and Gender Equality, April 2023, Redegørelse om Danmarks Digitale Vækst, accessed 10 October 2023, <https://www.ft.dk/samling/20222/almindel/diu/bilag/75/2696641.pdf>;

The European Commission, 28 July 2022, The Digital Economy and Society Index (DESI) monitors Europe's overall digital performance and tracks the progress of EU countries in their digital competitiveness, accessed 10 October 2023, <https://digital-strategy.ec.europa.eu/en/library/digital-economy-and-society-index-desi-2022>

<sup>32</sup> Ministry of Digital Government and Gender Equality, April 2023, Redegørelse om Danmarks Digitale Vækst, accessed 10 October 2023, <https://www.ft.dk/samling/20222/almindel/diu/bilag/75/2696641.pdf>

<sup>33</sup> Danish Business Authority, 23 September 2022, Nyhed: Få overblik over offentlige data med Datavejviser, accessed 12 October 2023, <https://erhvervsstyrelsen.dk/faa-overblik-over-offentlige-data-med-datavejviseren>

<sup>34</sup> Bjørn Bedsted (Danish Board of Technology), interview by the IRM, 20 October 2023 and Søren Kirk Jensen (Independent Policy Analysis), 25 October 2023.

<sup>35</sup> See <https://syddansksundhedsinnovation.dk/projekter/datadonor-plattformen>.

## Section III. Methodology and IRM Indicators

The purpose of this review is not an evaluation. It is intended as a quick, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, a high priority for country stakeholders, a priority in the national open government context, or a combination of these factors.

The IRM follows a filtering and clustering process to identify promising reforms or commitments:

**Step 1:** Determine what is reviewable based on the verifiability of the commitment as written in the action plan.

**Step 2:** Determine if the commitment has an open government lens. Is it relevant to OGP values?

**Step 3:** Review commitments that are verifiable and have an open government lens to identify if certain commitments need to be clustered. Commitments that have a common policy objective or contribute to the same reform or policy issue should be clustered. The potential for results of clustered commitments should be reviewed as a whole. IRM staff follow these steps to cluster commitments:

- a. Determine overarching themes. If the action plan is not already grouped by themes, IRM staff may use OGP's thematic tagging as reference.
- b. Review commitment objectives to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
- c. Organize commitments into clusters as needed. Commitments may already be organized in the action plan under specific policy or government reforms.

**Step 4:** Assess the potential for results of the clustered or standalone commitment.

Filtering is an internal process. Data for individual commitments is available in Annex 1. In addition, during the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).

As described earlier, IRM relies on **three key indicators** for this review:

### I. Verifiability

- **Yes, specific enough to review:** As written in the action plan, the stated objectives and proposed actions are sufficiently clear and include objectively verifiable activities to assess implementation.
- **No, not specific enough to review:** As written in the action plan, the stated objectives and proposed actions lack clarity and do not include explicitly verifiable activities to assess implementation.
- Commitments that are not verifiable will be considered not reviewable, and further assessment will not be carried out.

## II. Open government lens

This indicator determines if the commitment relates to the open government values of transparency, civic participation, or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance by responding to the following guiding questions. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The IRM uses the OGP values as defined in the Articles of Governance. In addition, the following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform or influence decisions? Will the government create, enable, or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association, and peaceful protest?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

## III. Potential for results

The IRM adjusted this indicator—formerly known as the “potential impact” indicator—to take into account the feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, the IRM modified this indicator to lay out the expected results and potential that would be verified in the IRM Results Report after implementation. Given the purpose of this Action Plan Review, the assessment of potential for results is only an early indication of the possibility the commitment has to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area.

The scale of the indicator is defined as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review was prepared by the IRM in collaboration with Cecilia Linn Hansen (Nordic Consulting Group) and was externally expert reviewed by Andrew McDevitt. The IRM methodology, quality of IRM products, and review process are overseen by IRM's IEP. For more information, see the IRM Overview section of the OGP website.<sup>36</sup>

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<sup>36</sup> IRM Overview: <https://www.opengovpartnership.org/irm-guidance-overview/>

## Annex 1. Commitment by Commitment Data<sup>37</sup>

<b>Commitment 1: Chatbot and Voicebot for Digital Self-Service</b>
<ul style="list-style-type: none"><li>• Verifiable: Yes</li><li>• Does it have an open government lens? No</li><li>• Potential for results: Unclear</li></ul>
<b>Commitment 2: Local Stakeholder Committees for State Forests and Nature Areas</b>
<ul style="list-style-type: none"><li>• Verifiable: Yes</li><li>• Does it have an open government lens? Yes</li><li>• Potential for results: Unclear</li></ul>
<b>Commitment 3: Citizen Involvement in the Region of Southern Denmark</b>
<ul style="list-style-type: none"><li>• Verifiable: Yes</li><li>• Does it have an open government lens? Yes</li><li>• Potential for results: Modest</li></ul>
<b>Commitment 4: DataDonor Research Project Platform</b>
<ul style="list-style-type: none"><li>• Verifiable: Yes</li><li>• Does it have an open government lens? No</li><li>• Potential for results: Unclear</li></ul>
<b>Commitment 5: National Data Portal</b>
<ul style="list-style-type: none"><li>• Verifiable: Yes</li><li>• Does it have an open government lens? Yes</li><li>• Potential for results: Modest</li></ul>

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<sup>37</sup> **Editorial notes:**

1. For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, rather than the individual commitments.
2. Commitment short titles may have been edited for brevity. For the complete text of commitments, see Denmark's action plan: <https://www.opengovpartnership.org/documents/denmark-action-plan-2023-2025-june/>

## Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the updated OGP Participation and Co-Creation Standards that came into force on 1 January 2022.<sup>38</sup> IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. During this time, IRM will assess countries' alignment with the standards and compliance with their minimum requirements.<sup>39</sup> However, countries will only be found to be acting contrary to the OGP process if they do not meet the minimum requirements, starting with action plans submitted to begin in 2024 and onward. Table 2 outlines the extent to which the countries' participation and co-creation practices meet the minimum requirements that apply during development of the action plan.

**Table 2. Compliance with minimum requirements**

Minimum requirement	Met during co-creation?	Met during implementation?
<b>1.1 Space for dialogue:</b> Government and non-government stakeholders met in the multi-stakeholder forum (MSF) on 19 January 2023 to discuss the action plan. In addition to this in-person meeting, the Agency for Digital Government (AfdG) invited stakeholders to submit proposals by email through an online hearing in September 2022. <sup>40</sup> The basic rules of the MSF were available in the online invitation. <sup>41</sup> After the January 2023 meeting, the AfdG finalized the commitments internally with the responsible agencies and sent the action plan to the MSF for a final hearing on 18 April 2023, with a deadline for comments on 28 April, before it was approved by the Finance Committee led by the Minister of Finance. <sup>42</sup> The email sent to the MSF notes that stakeholders would be notified when the action plan is approved in June.	Yes	<i>To be assessed in the Results Report</i>
<b>2.1 OGP website:</b> The AfdG maintains Denmark's OGP website. <sup>43</sup> The website contains the latest action plan.	Yes	<i>To be assessed in the Results Report</i>
<b>2.2 Repository:</b> The OGP webpage includes a summary of the January 2023 MSF meeting <sup>44</sup> and notices dated 9 August 2022 and 29 August 2022 for the online hearing (held in September 2022). <sup>45</sup> The webpage includes a document bank on Denmark's OGP cooperation. <sup>46</sup> The document bank has not been updated since the submission of the fourth action plan (2019-2022) and information on the implementation of commitments has not been updated since the third action plan (2017-2019). <sup>47</sup> Standard 2.2 requires the repository be updated at least twice a year with documentation relevant to the co-creation and implementation of action plans. Denmark's repository has not been updated with new information on the OGP process since the January 2023 meeting (besides publishing the fifth action plan in June 2023 <sup>48</sup> ), so the IRM assesses that this standard was not met during the co-creation period.	No	<i>To be assessed in the Results Report</i>
<b>3.1 Advanced notice:</b> The AfdG published the timeline for the co-creation process on 9 August 2022, 20 days before the online hearing opened the process. <sup>49</sup>	Yes	Not applicable

<p><b>3.2 Outreach:</b> The AfDG published an open invitation to participate in the co-creation process on its website.<sup>50</sup> All government levels (national, regional, and municipal) were informed of the OGP process and invited to submit proposals.<sup>51</sup> The AfDG also sent direct invitations to CSOs, principally but not exclusively organizations that had participated in past OGP processes.</p>	<p>Yes</p>	<p>Not applicable</p>
<p><b>3.3 Feedback mechanism:</b> The AfDG launched an online hearing where all interested persons could provide input.<sup>52</sup> The AfDG invited all government entities to submit proposals and sent direct invitations to relevant CSOs.<sup>53</sup> The hearing was open for 10 days (1-11 September 2022). While the IRM considers this timeframe along with the advanced notice (20 days) sufficient to meet standard 3.3, it was shorter than the hearings for past action plans (1-2 months).<sup>54</sup> The short timeframe was not sufficient for the Danish Institute for Human Rights to send concrete input while the hearing was open.<sup>55</sup></p>	<p>Yes</p>	<p>Not applicable</p>
<p><b>4.1 Reasoned response:</b> The action plan lists the policy areas submitted during the online hearing and subsequently discussed in the January 2023 MSF meeting. The original proposals from the online hearing were documented internally by the AfDG.<sup>56</sup> During the MSF meeting, the AfDG presented the initiatives that it had selected to become commitments.<sup>57</sup> The AfDG invited all stakeholders who submitted proposals during the public hearing to attend the January 2023 MSF meeting and the MSF jointly agreed upon the initiatives for the action plan.<sup>58</sup> According to the point of contact at the AfDG, the AfDG gave feedback on the proposals submitted by civil society verbally with stakeholders at the meeting.<sup>59</sup> An interviewed CSO stakeholder recalled that the January meeting was primarily a presentation of the selected initiatives based on the inputs from government actors.<sup>60</sup></p>	<p>Yes</p>	<p>Not applicable</p>
<p><b>5.1 Open implementation:</b> The IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.</p>	<p>Not applicable</p>	<p><i>To be assessed in the Results Report</i></p>

<sup>38</sup> 2021 OGP Participation and Co-Creation Standards: <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>

<sup>39</sup> IRM Guidelines for the Assessment of Minimum Requirements: <https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements/>

<sup>40</sup> Agency for Digital Government, Nyt om OGP, 9 August 2022, 29 August 2022, and 19 January 2023, <https://digst.dk/strategier/internationalt-samarbejde/open-government/nyt-om-ogp/>

<sup>41</sup> Agency for Digital Government, Høringsmateriale - OGP, 29 August 2022, <https://prodstoragehoeringspo.blob.core.windows.net/7a625614-bcaa-485f-b3c2-3783829a76c0/H%C3%B8ringsmateriale%20-%20OGP.pdf>

<sup>42</sup> Leander Wiesheu (PoC, Agency for Digital Government), interview by the IRM, 30 October 2023.

<sup>43</sup> Agency for Digital Government, Open Government action plans, <https://digst.dk/strategier/internationalt-samarbejde/open-government/open-government-handlingsplaner/>

<sup>44</sup> Agency for Digital Government, OGP network meetings, <https://digst.dk/strategier/internationalt-samarbejde/open-government/ogp-netvaerksmoeder/>

<sup>45</sup> Agency for Digital Government, News about OGP, <https://digst.dk/strategier/internationalt-samarbejde/open-government/nyt-om-ogp/>

<sup>46</sup> Agency for Digital Government, Dokumentbanken, <https://digst.dk/strategier/internationalt-samarbejde/open-government/dokumentbanken/>

<sup>47</sup> Agency for Digital Government, Dokumentbanken, <https://digst.dk/strategier/internationalt-samarbejde/open-government/dokumentbanken/>



- <sup>48</sup> See Agency for Digital Government, Open Government Action Plans, <https://digst.dk/strategier/internationalt-samarbejde/open-government/open-government-handlingsplaner/>
- <sup>49</sup> Agency for Digital Government, Nyt om OGP, 9 August 2022, <https://digst.dk/strategier/internationalt-samarbejde/open-government/nyt-om-ogp/>
- <sup>50</sup> Agency for Digital Government, Nyt om OGP, 9 August 2022, <https://digst.dk/strategier/internationalt-samarbejde/open-government/nyt-om-ogp/>
- <sup>51</sup> Leander Wiesheu (PoC, Agency for Digital Government), interview by the IRM, 30 October 2023.
- <sup>52</sup> The Hearing Portal, Høring om Danmarks kommende handlingsplan i Open Government Partnership (OGP), 1 September 2022, <https://hoeringsportalen.dk/Hearing/Details/66739>
- <sup>53</sup> Leander Wiesheu (PoC, Agency for Digital Government), interview by the IRM, 30 October 2023.
- <sup>54</sup> The Hearing Portal, all hearings regarding OGP, <https://hoeringsportalen.dk/Hearing?search=Open%20Govern>
- <sup>55</sup> Danish Institute for Human Rights, Høring Om Forslag Til Temaer og Initiativer til Digitaliseringsstyrelsens Kommende Nationale Handlingsplan Om Open Government 2023-2024, 9 September 2022.
- <sup>56</sup> Agency for Digital Government, Open Government Partnership National handlingsplan 2023-2025, June 2023, <https://digst.dk/media/28909/ogp-handlingsplan-2023-2025.pdf>. The three responses from the online hearing submitted by civil society were shared with the IRM researcher by the AfdG point of contact.
- <sup>57</sup> Agency for Digital Government, OGP netværksmøder, summary of meeting 19. Januar 2023, <https://digst.dk/strategier/internationalt-samarbejde/open-government/ogp-netvaerksmoeder/>
- <sup>58</sup> Information provided to the IRM by the AfdG during the pre-publication review of this report, 14 December 2023.
- <sup>59</sup> Leander Wiesheu (PoC, Agency for Digital Government), interview by the IRM, 30 October 2023.
- <sup>60</sup> Bjørn Bedsted (Danish Board of Technology), interview by the IRM, 20 October 2023.