

Independent Reporting Mechanism

Action Plan Review:
Finland 2023–2027

Open
Government
Partnership



Independent
Reporting
Mechanism

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Section I: Overview of the 2023–2027 Action Plan

Finland's fifth OGP action plan continues advancing priorities such as civic participation, public service training, and open data. The commitments mostly pursue incremental improvements to government practices. The national dialogues, which Finland started in the previous action plan, could yield promising results if the government creates stable mechanisms to utilize input from the dialogues in policy-making processes. The action plan could also improve access to information if government institutions reach a broad agreement for publication of open data in emergency situations.

Finland's fifth action plan contains three broad themes. Each theme comprises two commitments, some focusing on one policy area and some combining several issues. The action plan seeks to improve opportunities for public participation, build public officials' knowledge and skills in open government, foster cross-sectoral collaboration, promote open access to data and ethical use of Artificial Intelligence (AI), and share best practices in open government within and beyond Finland.

Most of the policy areas are carried over from previous action plans. However, several involve novel elements. For example, Commitment 2.1 introduces fighting the spread of mis- and disinformation. The fifth action plan also returns to the issue of youth participation addressed in the second plan. This time, the government promises to implement the Organisation for Economic Co-operation and Development (OECD)'s recommendations on increasing young people's participation and trust in government. Several commitments also foster open government in the wellbeing services regions – a new administrative level that started operation in early 2023.

The Ministry of Finance led an inclusive, participatory, and broad-based co-creation process that extended over nine months. The commitments were based on input from a number of civil society organizations (CSOs) and government institutions collected at events such as the national CSO Academy, dedicated meetings across Finland, online surveys, and discussions in the OGP multi-stakeholder forum (MSF). Civil society stakeholders are generally happy with the selected priorities¹ and the way the government took CSOs' input into account.² However, they noted the government could use simpler and more concise language when soliciting input from CSOs, especially underrepresented groups who are unfamiliar with OGP.³

The government decided to keep the number of commitments in the action plan low.⁴ This could help the government focus its efforts on meaningful progress in the selected areas. However, the design of the commitments mostly seeks to continue or modestly expand the

AT A GLANCE

Participating since: 2013
Action plan under review: 2023–2027
Number of commitments: 6

Overview of commitments:
Commitments with an open government lens: 6 (100%)
Commitments with substantial potential for results: 0
Promising commitments: 2

Policy areas:
Carried over from previous action plans:

- Civic participation
- Public officials' capacity-building
- Easy language
- Open data & ethical AI

Emerging in this action plan:

- Fighting mis- and disinformation

Compliance with OGP minimum requirements for co-creation: Yes

daily operation of regular activities (often started in previous action plans), without a clear vision of how each commitment could achieve a qualitative change in government openness. Having chosen a four-year action plan, Finland is required to schedule a refresh period at the two-year mark. During this refresh, the IRM recommends the Ministry of Finance to tap into the collective expertise of the open government working group and the new Open Democracy network to raise the ambition of the commitments and develop measurable outcome-level indicators to monitor their progress.

The potential results of this action plan are further constrained by some activities' internal focus to the public administration and lack of public-facing measures. Such activities can be found, for example, under Commitment 3.1 (Enhancing the sharing of good practices in open government) and Commitment 2.1 (Preventing the spread of mis- and disinformation). When implementing these commitments, the government could consider creating feedback loops and monitoring mechanisms for the public. For instance, the Ministry of Finance could disseminate best practices among the public, so that citizens would have a tool to benchmark actual government practices against. The government could also involve civil society in discussions on improving public access to data and develop mechanisms for the public and experts to monitor government institutions' compliance with the guidelines for the ethical use of AI.

This review highlights two commitments that could improve government openness if the government develops mechanisms to foster deeper institutional change in these areas. First, Commitment 1.1 could strengthen the impact of the national dialogues established during the fourth action plan with its focus on the utilization of input from the dialogues in public policymaking. Second, Commitment 2.1 could result in better public access to information at times of emergencies. As the government struggled to provide public access to the data behind policy decisions during the COVID-19 pandemic, this commitment seeks to develop a common understanding within the public administration on good data publication practices in emergency situations. To increase the impact of this commitment, the IRM encourages the government to systematically monitor government institutions' compliance with the best practices.

¹ Open Knowledge Finland, Opinion on the 5th OGP action plan, 23 August 2023, <https://www.okf.fi/fi/2023/11/23/lausunto-avoimen-hallinnon-v-toimintaohjelma/>

² Riitta Kittilä (Finnish Federation for Social Affairs and Health (SOSTE), member of the Finnish civil society advisory board (KANE) and open government working group), interview by the IRM, 20 December 2023.

³ Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.

⁴ Katju Holkeri (Ministry of Finance, OGP Point of Contact), correspondence with the IRM, 19 December 2023.

Section II: Promising Commitments in Finland’s 2023–2027 Action Plan

The following review looks at the two commitments 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
Commitment 1.1: This commitment aims to expand Finland’s national dialogues by engaging new target groups, increasing the diversity of dialogue organizers and participants, and fostering the utilization of input from the dialogues in policy-making processes.
Commitment 2.1: This commitment entails improving public access to open data in emergency situations and promoting the opening of public spending data in municipalities and the new wellbeing services regions.

Commitment 1.1 Strengthening inclusion, mutual understanding and evidence-based policymaking through dialogues (Ministry of Finance)

For a complete description of the commitment, see commitment 1.1 in the action plan [here](#).

Context and objectives:

During the COVID-19 pandemic, the government launched Lockdown Dialogues – a series of online and face-to-face public engagement events to discuss citizens’ experiences and concerns during the pandemic.⁵ The Open Government Strategy that Finland adopted during its fourth action plan (2019-2023) prioritized dialogue in society as one of the key goals of open government efforts in Finland. In the mid-term assessment, the government stated the need to incorporate this new priority in the action plan,⁶ and introduced a new commitment to establish dialogues with citizens as a regular form of civic participation.⁷

The aim of this new civic participation format is to strengthen trust in society by giving citizens the chance to meet people from diverse sectors and discuss issues that are important to them.⁸ Although the Finnish government enjoys high public trust compared to the OECD average, trust in government has declined over the years (from 76 percent in 2007 to 61 percent in 2021⁹).¹⁰ As experts considered the Lockdown Dialogues successful, the OECD recommended the government to continue this type of dialogues to improve the government’s interaction with vulnerable and harder-to-reach societal groups.¹¹

During the fourth action plan, the Ministry of Finance developed a model of national dialogues with the help of the public innovation fund Sitra, the Timeout Foundation, and Dialogue Academy. The national dialogues organizers mainly use the ‘Timeout’ method¹² to facilitate discussions where small groups of people meet online or face-to-face in different locations and

share their views on a predefined topic of societal importance. The government and civil society built a network of dialogue organizers from the public, private, and non-profit sector, and set up a governance structure to coordinate future dialogues. The operational core group involves public sector organizations (the Prime Minister's office and the municipality of Tuusula), a public think tank (Sitra), a CSO (Child Protection Association), and a private consultancy (Dialogue Academy). The core group coordinates the selection of topics based on input from dialogue participants and organizes background and orientation materials as well as trainings for dialogue facilitators.¹³ Dialogue organizers share discussion notes with the core group, and the core group involves researchers to produce summaries of each round of dialogues based on the notes.¹⁴ The core group publishes all summaries on a central website.¹⁵

The core group coordinated a series of Democracy Defense dialogues in the spring of 2022 to discuss ways of protecting democratic societies after Russia's full-scale invasion of Ukraine.¹⁶ The Ministry of Interior then piloted the national dialogue model to discuss migration issues in autumn 2022.¹⁷ The first nationwide dialogues applying the new model were held in spring 2023, focusing on how citizens were coping with uncertainty and continuous crises. In 2022 and 2023, about 230 events engaging close to 2,000 participants were held throughout Finland before the start of the fifth action plan.¹⁸ In addition, the dialogue format was used in other events such as the national CSO Academies (Commitment 1 in the fourth action plan).

Potential for results: Modest

The fifth action plan sets two main objectives: 1) engaging new target groups and increasing the diversity of dialogue organizers and participants, and 2) fostering the utilization of input from the dialogues in policy-making processes. The government has already made efforts to engage more diverse groups. Several organizations working with marginalized and vulnerable groups have already organized dialogue events, e.g. those representing children and youth, immigrants, Romani people, and visually impaired people.¹⁹ To increase diversity, the core group maps what groups are missing from discussions and invites them to organize dialogues.²⁰

The aim to feed the results of dialogues into policy-making processes appears more challenging. According to Riitta Kittilä, a civil society representative in the MSF, CSOs would like to see more focus on the actual usage of dialogue results and the impact of dialogues on policy.²¹ Citizens who participated in the Ministry of Interior's immigration dialogues also expressed the expectation that public authorities effectively address the issues raised in the dialogues.²² So far, the government has not systematically measured to what extent public authorities at the local, regional, and national level have used input from dialogues in their work. According to Katju Holkeri from the Ministry of Finance, policy reports seldom make an explicit reference to the dialogues.²³ CSOs tend to believe the dialogues, while novel and interesting, are less impactful on policy decisions than traditional methods such as CSO advocacy or advisory board work.²⁴ However, the dialogues are intended to supplement, rather than replace, these traditional methods.

The government plans to encourage authorities at different administrative levels to use the dialogues to inform public policy. A particular area in which the Ministry of Finance expects to see more use of dialogues is strategic foresight. Most ministries occasionally publish foresight reports, and every national government presents a foresight report to the Parliament once during its term. Although the government has not defined a specific target regarding the extent

to which foresight reports are expected to take up dialogue results, the Ministry of Finance expects to see more explicit references to dialogues in such reports in the future.²⁵

To increase the use of dialogue results, the commitment foresees the preparation of shorter thematic summaries of dialogues and forwarding the results to government agencies, municipalities, and the new wellbeing services counties. In February 2024, the government plans to discuss the results of the ongoing dialogue on the role of communities in societal wellbeing at a public sector leadership event, which will bring together top managers from local, regional, and national-level public administration.²⁶ Moreover, the core group works to enroll more municipalities to the network of regular dialogue organizers. It is reasonable to believe these measures will increase public authorities' interest in using dialogue results in their work.

In addition to the goals of participant diversity and utilization of results, the Ministry of Finance and the core group want the experience of participating in the dialogues to be meaningful to citizens, regardless of the dialogues' eventual impact on policy.²⁷ The perceived value of participation and the subjective feeling of being listened to is an important area of impact in light of the dialogues' aim to increase citizens' trust in government and fellow citizens. While there is anecdotal evidence that participation in the dialogues has increased participants' trust in each other,²⁸ the impact of the dialogues on public trust has not been systematically researched so far.

This commitment could lead to increased diversity of dialogue organizers and participants, as well as increased usage of input from dialogues in policymaking. However, given the baseline established by the fourth action plan, and the lack of clear objectives for the fifth action plan, this commitment would likely have modest rather than transformative impacts on policy outcomes, the participation of marginalized and vulnerable groups, and public trust.

Opportunities, challenges, and recommendations during implementation

Despite the absence of clear targets in the action plan, the MSF has already defined several indicators to monitor the results of this commitment. These include the expansion of the dialogues in terms of societal reach, organizers, and participants; public perception of the dialogues; improvements in dialogic skills; the perceived usefulness and actual use of input from dialogues in public decision-making and foresight.²⁹ To achieve the full potential of this commitment, the government and the MSF could start by formulating ambitious and measurable targets to assess progress against these indicators. Since one of the aims of the dialogues was to increase public trust, the government could also systematically study the effects of participation in the dialogues on citizens' trust in government and democratic institutions. To measure progress, the core operational group could:

- systematically monitor references to the dialogues in policy documents, debate transcripts, political statements, etc., and publish the results on the central website;
- develop a methodology to evaluate individual participation experiences and the effects of participation in dialogues on citizens' trust in government and democratic institutions (e.g. surveys after each event, qualitative interviews with a sample of participants, etc.).

If the government can demonstrate the actual usage of input from dialogues in policy-making processes, this could increase citizens' interest in participating in the dialogues as well as their trust in government. To increase usage of the results, it is key to secure buy-in from local, regional, and national authorities, which is also one of the greatest challenges of this

commitment. It is particularly important to engage municipalities as this administrative level often deals with citizens' most pressing concerns and is where it is the easiest to demonstrate a direct link between public participation and policy outcomes. To ensure buy-in, it would be useful to involve local and regional authorities in the dialogue process from the outset, i.e. actively recruit municipalities as regular organizers of national dialogues (which is already being done), involve them in formulating dialogue topics, and provide them advice and tools to conduct local dialogues on topics of local importance. The core operational group could also seek regular feedback from public authorities and adjust the format of the dialogues to ensure the outputs can be effectively used in policymaking.

A few additional steps could strengthen the impact of this commitment:

- The action plan states that national dialogues will be integrated into the work of the new Open Democracy network (Commitment 3.2), which connects hundreds of public officials, CSOs, and other stakeholders in advancing open government. The government wishes the network to develop its own mandate, rather than impose tasks to the network top-down.³⁰ The government could nevertheless initiate discussions in the network on the role that the network and its participating organizations could take in implementing national dialogues, promoting dialogue-based public participation methods, and facilitating the use of discussion outputs in public policy and education.
- Summaries and publications on the dialogues could serve as valuable education material that can be adapted for different purposes, from civics lessons at schools to civil service training. As part of Commitment 1.2, a handbook based on the Democracy Defense dialogues is already being produced for public officials. At the same time, CSOs have recommended turning dialogue summaries into more systematic and educational descriptions of the discussion topics by adding relevant facts and evidence to citizens' opinions on the subject matter.³¹
- To engage vulnerable and marginalized groups, organizers could prioritize the accessibility of dialogue venues and the online channels used for conducting dialogues and providing information on the dialogues. This includes the use of easy language.

Commitment 2.1 Preventing mis- and disinformation through expertise and reliable information (Ministry of Finance)

For a complete description of the commitment, see Commitment 2.1 in the action plan [here](#).

Context and objectives:

Although the title of this commitment focuses on mis- and disinformation, its main goals pertain to improving public access to government information and publication of open data. Access to information, including open government data, has been a recurrent priority in Finland's OGP action plans. The fourth action plan focused on developing standards and guidelines to increase the quality of open data and usability of data portals to support the implementation of the 2019 EU Open Data Directive (EU/2019/1024). The fifth action plan contains four somewhat separate activity streams: 1) improving public access to open data in emergency situations, 2) promoting the opening of public spending data in municipalities and the new wellbeing services regions, 3) collaborating with other OECD countries to step up the fight against the global spread of mis- and disinformation, and 4) workshops to help implement the Artificial Intelligence (AI) ethics guidelines developed during the previous action plan across the public administration. The

IRM’s analysis focuses on the first two activities as these could potentially help advance government openness in priority areas for civil society.

Access to data in exceptional circumstances was a matter of public controversy during the COVID-19 pandemic in 2020 when the government agencies responsible for public health policies failed to fully respond to civil society’s demand for publishing the data models and the source codes that the government used to design crisis response measures. According to open data experts, the public sector’s reluctance to publish data may have been related to fears of compromising privacy and security by opening potentially sensitive data.³² At the same time, Russia’s full-scale invasion of Ukraine in 2022 has increased the weight of security considerations in the discourse around open data.³³ Against this backdrop, the fifth action plan seeks to develop a common understanding within the public administration of the importance of openness and appropriate data publication practices in emergency situations where open government values need to be balanced with other policy goals such as national security.

The commitment’s objective to promote the opening of public sector spending data at the subnational level continues the second and third action plan’s work on opening public procurement data. As a result of the third (2017–2019) action plan, the government launched the openprocurement.fi online service, which provides public access to the central government agencies’ procurement data, as well as tools for exploring the data by government agency, supplier, and procurement category. Open data is available starting from 2016 at the level of individual purchase invoices.³⁴ The IRM assessed this as a major improvement in public access to public procurement data and recommended expanding the practice of opening public procurement data to the municipal and regional level.³⁵

Potential for results: Modest

According to the European Open Data Maturity Report 2023³⁶ and OECD OURdata Index 2023,³⁷ Finland performs well in open data. Finland has opened most of the datasets with the highest economic and societal value³⁸ and made rapid progress in developing its national open data portal.³⁹ However, according to Janne Peltola from Open Knowledge Finland (OKFI), Finland could do more to increase the transparency of policy-guiding simulation models and algorithms.⁴⁰ While aware of the importance of national security, CSOs see a need for societal dialogue on how to ensure government openness in delicate security situations.⁴¹ As a minimum, CSOs believe the government should analyze the lessons learned from the tensions around access to open data during the pandemic.⁴²

Despite the importance of developing a shared understanding and clearer rules on providing access to government data in emergency situations, this commitment is vague, with the government seeking to hold ‘intersectoral discussions’ and collect best practices on how to open data in exceptional security situations. Absent more specific objectives, it is difficult to assess how the planned discussions could lead to a broad agreement in the public sector of appropriate data publication practices in emergency situations, and how the collection of best practices would lead to actual implementation and widespread compliance with these practices. Since the action plan does not outline a clear plan to substantially change current practices, the results of this commitment may be modest.

The aim to promote the opening of public sector spending data in municipalities and wellbeing services counties faces similar challenges. On the one hand, this is an area where civil society

stakeholders see important gaps. On the other, the commitment, as written, does not provide a clear roadmap to transform the open data landscape in municipalities and regions. Finland has slightly over 300 municipalities and 21 wellbeing services counties, which are responsible for organizing social, health, and emergency services. The counties are fully funded by the central government but autonomous in their decisions. According to Janne Peltola, opening public procurement data has so far not been a priority for regions, and working with regions to open up data is one of OKFI's key projects for 2024.⁴³ CSOs working in the social and health sector would greatly appreciate the publication of regional open procurement data as this would enable them to compare the spending with service outcomes in different regions and analyze the share of CSOs in public service provision.⁴⁴ As the counties only started work at the beginning of 2023 and have no prior history of procurement, the next years offer a window of opportunity to introduce an open procurement culture at the outset.⁴⁵

As of early 2024, no wellbeing regions and about one-tenth of Finland's municipalities have published public spending data on the national open data portal.⁴⁶ This points to a gap between the public's expectations and the actual data publication practices. However, changing data publication practices in hundreds of administrative entities with very different baselines would likely warrant a more holistic program that addresses key barriers to open data publication, and builds municipalities' and regions' capacity and interest to open up data.

Opportunities, challenges, and recommendations during implementation

To achieve substantial results, the government could formulate specific objectives for the four-year action plan term together with civil society. Once the ambition is clear, specific mechanisms and roadmaps can be developed to achieve the desired changes in access to open data in emergency situations and financial transparency. To foster harmonized data publication in emergencies, the government could consider whether public sector organizations would benefit from binding rules in the form of specific legal obligations in addition to general access to information legislation. At the same time, due to the complex and unpredictable nature of emergency situations, 'softer' recommendations and best practices may be more effective and flexible in ensuring government transparency at times of crises, provided the government takes steps to ensure high awareness and high compliance with such recommendations.

The government could consider the following recommendations when implementing the commitment:

- Involve diverse perspectives (including open data experts and civil society) in the discussions around open data publication in emergency situations to strike a balance between openness and national security considerations. The aim could be to strive for a broad-based agreement among stakeholders on the desired level of openness and the data publication practices that meet the standard.
- If the discussions result in the creation of non-binding recommendations or guidelines, it is crucial for the Ministry of Finance to systematically assess the public administration's level of compliance with the guidelines and learn whether additional measures may be needed. The ministry could share the results of the monitoring with the public to promote accountability. The guidelines could also be disseminated among the public, so that civil society have the tools to demand compliance with the requirements.
- Both for open data publication in emergency situations and public procurement data, the government could analyze the barriers to opening data from the perspective of public

sector organizations and individual public officials (e.g. legal awareness, data skills, technical capacity, human resource limitations, etc.). A thorough understanding of the key barriers could help the government design a support program for public sector organizations to implement the agreed standards and best practices of data publication. CSOs working with open data suggest focusing on how to make transparency more convenient for public officials – for example, by providing shared infrastructures to reduce the administrative burden related to data publication.⁴⁷

- Since municipalities and wellbeing services regions may have uneven capacity to provide open data, they could benefit from a holistic support program to help them publish high-quality open procurement data. In addition to raising awareness of the rules and standards for publishing open spending data, the government could provide more specific guidelines where needed,⁴⁸ disseminate best practices, provide tailor-made capacity-building and possibly funding and technical assistance to reduce data publication barriers.

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.

As written, most commitments in the action plan describe the main activities for the next four years but lack elaboration on milestones and the expected outputs and outcomes by the end of the action plan term. For example, while the CSO academies (Commitment 2.2) are important for civil society⁴⁹ and have received positive feedback from participants,⁵⁰ the aims for the next four years are mostly to continue and expand existing practices, without specifying the qualitative change in government openness that the academies could help achieve. Without sufficient clarity on the objectives and activities for reaching them, the actual results of such commitments on open government practices may not reach their full potential. The MSF has begun defining quantitative and qualitative indicators to assess the outputs and outcomes of the commitments.⁵¹ Having chosen a four-year action plan, Finland will have to schedule a mandatory refresh period at the two-year mark. The IRM suggests the government and the MSF use this refresh to define more specific targets for 2027 and design a more detailed activity plan to work towards the expected results.

Several of the commitments not assessed in detail could generate valuable outcomes if their ambition is raised. For example, CSOs consider Commitment 1.2 (Supporting democracy by improving encounters in public service provision) an area where an open government culture could be mainstreamed among all civil service, including the public officials working directly with citizens, who often do not think of themselves as doing 'democracy work'.⁵² This commitment involves publishing a handbook and online training materials for applying open democracy values in interacting with citizens, as well as an e-learning course on easy language. The Ministry of Finance has thus far not defined a clear ambition for this commitment.⁵³ Since the relationship between strengthened democracy and the behavior of civil servants engaged in public service provision is not self-evident, this commitment could benefit from a 'theory of change' or a conceptual pathway outlining how the activities and outputs contribute to changes in the governance culture. The government has defined qualitative indicators to assess the outcomes of this commitment. In addition to assessing citizens' satisfaction with public services,

the government plans to measure the quality of encounters (i.e. interactions between citizens and civil servants and the level of government responsiveness) in public service provision, as well as their impact on public trust in government.⁵⁴ Although it may be difficult to establish a causal relationship between public service encounters and public trust⁵⁵ the aim to evaluate the quality of interactions is commendable. Moving forward, the government could:

- complement the assessment framework with indicators to assess changes in public officials' awareness and commitment to open government values;
- analyze what measures may be needed to help public officials practice what they learn from handbooks and trainings;
- discuss how the idea of 'democratic encounters' could be adapted to the context of digital public services, which are increasingly used by Finnish citizens.⁵⁶

⁵ Elina Henttonen 2022, Lockdown Dialogues: Crisis experiences and model for national dialogue, Sitra Studies 213, 2022, <https://www.sitra.fi/en/publications/lockdown-dialogues/>

⁶ Open Government Partnership, Finland Mid-Term Self-Assessment 2019–2023, <https://www.opengovpartnership.org/documents/finland-mid-term-self-assessment-2019-2023/>

⁷ Open Government Partnership, OGP Finland Action Plan 2019–2023 (amended): https://www.opengovpartnership.org/wp-content/uploads/2019/09/Finland_Action-Plan_2019-2023_Amended.pdf

⁸ Open Government Partnership, Democratic Freedoms Learning Network, discussion notes 13 December 2022, <https://www.opengovpartnership.org/wp-content/uploads/2023/01/Building-Dialogue-Between-Government-and-Civil-Society--Democratic-Freedoms-Learning-Network.pdf>

⁹ OECD, Government at a Glance: Country Notes. Finland, 30 June 2023, <https://www.oecd.org/publication/government-at-a-glance/2023/country-notes/finland-d1080a88>

¹⁰ OECD, Drivers of Trust in Public Institutions in Finland, Building Trust in Public Institutions, 2021, <https://doi.org/10.1787/52600c9e-en>

¹¹ OECD, Civic Space Scan of Finland, OECD Public Governance Reviews, 2021, https://www.oecd-ilibrary.org/governance/civic-space-scan-of-finland_f9e971bd-en

¹² Timeout Foundation, What's Timeout about?, <https://www.timeoutdialogue.fi/whats-timeout-about/>

¹³ Katju Holkeri (Ministry of Finance), interview by the IRM, 27 November 2023.

¹⁴ Katju Holkeri (Ministry of Finance), interview by the IRM, 27 November 2023.

¹⁵ National Dialogues, <https://kansallisetdialogit.fi/en>

¹⁶ National Dialogues, Summary of Democracy Defence Dialogues – We are all responsible for strengthening democracy, 2022, <https://kansallisetdialogit.fi/en/news/summary/summary-of-democracy-defence-dialogues-we-are-all-responsible-for-strengthening-democracy/>

¹⁷ National Dialogues, Hot topics at immigration dialogues, 2022, <https://kansallisetdialogit.fi/en/news/summary/integration-and-challenges-in-finding-a-job-hot-topics-at-immigration-dialogues/>

¹⁸ Sitra, Based on data from the summaries of the Democracy Defense Dialogues, 2022,

<https://media.sitra.fi/app/uploads/2022/11/sitra-democracy-defence-dialogues-1.pdf>; Ministry of the Interior Finland, Immigration Dialogues, 2023,

https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164777/SM_2023_12.pdf?sequence=1&isAllowed=y; and National Dialogues, Life in uncertainty, 2023, https://kansallisetdialogit.fi/wp-content/uploads/Life-in-uncertainty_2023-National-Dialogues.pdf:

¹⁹ Sitra, Based on the summaries of the Democracy Defense Dialogues <https://media.sitra.fi/app/uploads/2022/11/sitra-democracy-defence-dialogues-1.pdf>; Ministry of the Interior Finland, Immigration Dialogues, 2023, https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164777/SM_2023_12.pdf?sequence=1&isAllowed=y; and National Dialogues, Life in uncertainty, 2023, https://kansallisetdialogit.fi/wp-content/uploads/Life-in-uncertainty_2023-National-Dialogues.pdf:

²⁰ Katju Holkeri (Ministry of Finance), interview by the IRM, 27 November 2023.

²¹ Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.

²² Elina Henttonen and Kai Alhanen, Immigration Dialogues: Diverse discussions on the daily life and politics of immigration, Publications of the Ministry of the Interior, 2023, p 54,

https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164777/SM_2023_12.pdf

²³ Katju Holkeri (Ministry of Finance), interview by the IRM, 27 November 2023.

²⁴ Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.

²⁵ Katju Holkeri (Ministry of Finance), interview by the IRM, 27 November 2023.

- ²⁶ Katju Holkeri (Ministry of Finance), interview by the IRM, 27 November 2023.
- ²⁷ Katju Holkeri (Ministry of Finance), interview by the IRM, 27 November 2023.
- ²⁸ Elina Henttonen, Lockdown Dialogues: Crisis experiences and model for national dialogue, Sitra Studies 213, pp 38-40, 2022, <https://www.sitra.fi/en/publications/lockdown-dialogues/>
- ²⁹ Arviointisuunnitelma (assessment plan for the fifth action plan), https://avoinhallinto.fi/assets/files/2023/12/Arvioinnin-suunnitelma_Viides-toimintaohjelma.pdf
- ³⁰ Katju Holkeri (Ministry of Finance), interview by the IRM, 27 November 2023.
- ³¹ Open Knowledge Finland, Lausunto – Avoimen hallinnon V toimintaohjelma, 23 August 2023, <https://www.okf.fi/fi/2023/11/23/lausunto-avoimen-hallinnon-v-toimintaohjelma/>
- ³² Open Government Partnership, Finland Design Report 2019–2023, <https://www.opengovpartnership.org/documents/finland-design-report-2019-2023/>
- ³³ Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.
- ³⁴ Data from the OpenProcurement.fi service, Finland’s open data portal, https://www.avoindata.fi/data/en_GB/dataset/tutkihankintoja-data
- ³⁵ Open Government Partnership, Finland Implementation Report 2017-2019, https://www.opengovpartnership.org/wp-content/uploads/2020/04/Finland_Implementation_Report_2017-2019_EN.pdf
- ³⁶ European Union, Open Data in Europe 2023, <https://data.europa.eu/en/publications/open-data-maturity/2023>
- ³⁷ OECD Open, Useful and Re-usable data (OURdata) Index 2023, https://www.oecd-ilibrary.org/governance/2023-oecd-open-useful-and-re-usable-data-ourdata-index_a37f51c3-en
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- ⁴⁰ Janne Peltola (Open Knowledge Finland), correspondence with the IRM, 22 December 2023.
- ⁴¹ Open Knowledge Finland, Lausunto – Avoimen hallinnon V toimintaohjelma, 23 August 2023, <https://www.okf.fi/fi/2023/11/23/lausunto-avoimen-hallinnon-v-toimintaohjelma/>
- ⁴² Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.
- ⁴³ Janne Peltola (Open Knowledge Finland), correspondence with the IRM, 22 December 2023.
- ⁴⁴ Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.
- ⁴⁵ Neumann, Georg. “Finland’s Hansel creates a digital trail of state spending”, Open Contracting Partnership, 27 April 2023, <https://www.open-contracting.org/2023/04/27/finlands-hansel-creates-a-digital-trail-of-state-spending/>
- ⁴⁶ Avoindata.fi, <https://www.avoindata.fi/data/fi/search?q=ostolasku> (queried on 2 January 2024).
- ⁴⁷ Janne Peltola (Open Knowledge Finland), correspondence with the IRM, 22 December 2023.
- ⁴⁸ The Association of Finnish Municipalities has already published basic guidelines to municipalities on opening public spending data in 2021: Haapalehto, S., Kettunen, E., Vaine, J., and Ylitalo, M-L. “Kuntien ja kuntayhtymien ostolaskudatan avaamisen ohje”, <https://www.kuntaliitto.fi/julkaisut/2021/2112-kuntien-ja-kuntayhtymien-ostolaskudatan-avaamisen-ohje>.
- ⁴⁹ Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.
- ⁵⁰ Pauliina Pussinen (Ministry of Finance), correspondence with the IRM, 15 December 2023.
- ⁵¹ Arviointisuunnitelma (assessment plan for the fifth action plan), https://avoinhallinto.fi/assets/files/2023/12/Arvioinnin-suunnitelma_Viides-toimintaohjelma.pdf
- ⁵² Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.
- ⁵³ Katju Holkeri (Ministry of Finance), interview by the IRM, 27 November 2023.
- ⁵⁴ Arviointisuunnitelma (assessment plan for the fifth action plan), https://avoinhallinto.fi/assets/files/2023/12/Arvioinnin-suunnitelma_Viides-toimintaohjelma.pdf
- ⁵⁵ Steven Van de Walle & Geert Bouckaert (2003) Public Service Performance and Trust in Government: The Problem of Causality, International Journal of Public Administration, 26:8-9, 891-913, DOI: 10.1081/PAD-120019352.
- ⁵⁶ European Commission, Digital Economy and Society Index (DESI) 2021: Finland, <https://ec.europa.eu/newsroom/dae/redirection/document/80584>

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 three IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A 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.

In the Action Plan Review, 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 Maarja Olesk and was externally expert reviewed by Ernesto Velasco. 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.⁵⁷

⁵⁷ IRM Overview: <https://www.opengovpartnership.org/irm-guidance-overview/>

Annex 1. Commitment by Commitment Data⁵⁸

Commitment 1.1: Strengthening inclusion, mutual understanding, and evidence-based policymaking through dialogues

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 1.2: Supporting democracy by improving encounters in public service provision

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 2.1: Preventing mis- and disinformation through expertise and reliable information

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 2.2: Establishing the operating model of the Open Government Civil Society Academy at national and regional level

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 3.1: Enhancing the sharing of good practices in open government

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 3.2: Launching an open democracy network

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

⁵⁸ **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, please see Finland's action plan: <https://www.opengovpartnership.org/documents/finland-action-plan-2023-2027/>

Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the OGP Participation and Co-Creation Standards that came into force on 1 January 2022.⁵⁹ The IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. 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.

OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. Action plans co-created and submitted by 31 December 2023 fall within the grace period. The IRM will assess countries’ alignment with the standards and their minimum requirements.⁶⁰ However, countries will only be found to be acting contrary to process if they do not meet the minimum requirements for action plans co-created in 2024 and onwards.

Please note that, according to the OGP National Handbook, countries implementing four-year action plans must undertake a refresh process at the two-year mark. Countries are expected to meet minimum requirements 3.1 and 4.1 during the refresh process.⁶¹ IRM assessment of the refresh process will be included in the Results Report.

Table 2. Compliance with minimum requirements

Minimum requirement	Met during co-creation?	Met during implementation?
Space for dialogue: The previous composition of the MSF (open government working group) met four times in the co-creation period (December 2022 to September 2023). ⁶² The rules and mandate of the MSF are published on the Ministry of Finance’s website. ⁶³ The government renewed the MSF’s mandate and established a new composition for the years 2023-2027 on 16 November 2023. ⁶⁴	Yes	<i>To be assessed in the Results Report</i>
2.1 OGP website: The government has a dedicated website on OGP action plans, which is publicly accessible ⁶⁵ and contains the latest action plan. ⁶⁶	Yes	<i>To be assessed in the Results Report</i>
2.2 Repository: The government’s OGP website contains a repository of commitments and documents, which includes information on the co-creation of the fifth action plan ⁶⁷ and implementation of the fourth action plan (2019-2023). ⁶⁸ The repository was updated more than twice in 2023, but the information on the implementation of the fourth action plan has not been updated with the final results as of January 2024. ⁶⁹	Yes	<i>To be assessed in the Results Report</i>
3.1 Advanced notice: The Ministry of Finance published upcoming participation opportunities several weeks in advance in its monthly newsletters throughout the co-creation process. ⁷⁰	Yes	<i>To be assessed in the Results Report</i>
3.2 Outreach: The Ministry of Finance organized numerous events and meetings to solicit stakeholder input to the action plan. ⁷¹	Yes	Not applicable
3.3 Feedback mechanism: The Ministry of Finance organized tens of events, meetings, and public comment rounds in the period of December 2022 to August 2023 to solicit stakeholder input and feedback to the action plan. These events were either dedicated specifically to action plan co-creation or were part of related events such	Yes	Not applicable

as CSO academies. ⁷² The stakeholders who gave input included CSOs working with human rights issues, youth, refugees, the Romani community, health, environment, etc. ⁷³		
4.1 Reasoned response: Stakeholder input has been summarized in a memo, published on the OGP repository. ⁷⁴ The government published a tracked-changes version of the action plan after the public comment round in September 2023. ⁷⁵	Yes	<i>To be assessed in the Results Report</i>
5.1 Open implementation: 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.	Not applicable	<i>To be assessed in the Results Report</i>

⁵⁹ 2021 OGP Participation and Co-Creation Standards: <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>

⁶⁰ IRM Guidelines for the Assessment of Minimum Requirements:

<https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements/>

⁶¹ OGP National Handbook 2022, Section 2.3: <https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2022/>

⁶² Ministry of Finance, Avoimen hallinnon työryhmä 2019–2023, <https://vm.fi/hanke?tunnus=VM153:00/2019>

⁶³ Ministry of Finance, Avoimen hallinnon työryhmä 2019–2023, <https://vm.fi/hanke?tunnus=VM153:00/2019>

⁶⁴ Ministry of Finance, Avoimen hallinnon työryhmä 2023–2027, asettamispäätös, 16 November 2023 (shared by email to the IRM, 28 November 2023).

⁶⁵ Avoim Hallinto, <https://avoinhallinto.fi>

⁶⁶ Avoimen hallinnon 5. kansallinen toimintaohjelma 2023–2027, <https://avoinhallinto.fi/toimintaohjelmat/>

⁶⁷ Avoimen hallinnon 5. kansallinen toimintaohjelma 2023–2027, <https://avoinhallinto.fi/toimintaohjelmat/>

⁶⁸ Avoimen hallinnon IV toimintaohjelman toimeenpano, <https://avoinhallinto.fi/toimeenpano/>

⁶⁹ Avoimen hallinnon IV toimintaohjelman toimeenpano, <https://avoinhallinto.fi/toimeenpano/>

⁷⁰ Avoim hallinto, Uutisarkisto, 2023, <https://avoinhallinto.fi/2023/>

⁷¹ Miten avoimen hallinnon viides toimintaohjelma on laadittu? Avoim hallinto: toimintaohjelma 2023–2027, p 10,

https://avoinhallinto.fi/assets/files/2023/10/Avoim-hallinto_-_V-toimintaohjelma_01102023-1.pdf

⁷² Miten avoimen hallinnon viides toimintaohjelma on laadittu? Avoim hallinto: toimintaohjelma 2023–2027, p 10,

https://avoinhallinto.fi/assets/files/2023/10/Avoim-hallinto_-_V-toimintaohjelma_01102023-1.pdf

⁷³ Muistio: Mitä kuulumme? Koonti Avoimen hallinnon V kansallisen toimintaohjelman laadintaprosessin aikana käydyistä keskusteluista, 9 May 2023, https://avoinhallinto.fi/assets/files/2023/05/Mita-kuulimme_muistio_2023.pdf

⁷⁴ Muistio: Mitä kuulumme? Koonti Avoimen hallinnon V kansallisen toimintaohjelman laadintaprosessin aikana käydyistä keskusteluista, 9 May 2023, https://avoinhallinto.fi/assets/files/2023/05/Mita-kuulimme_muistio_2023.pdf

⁷⁵ Avoim hallinto: Toimintaohjelma 2023–2027, 27 September 2023, https://avoinhallinto.fi/assets/files/2023/10/Avoim-hallinto_-_V-toimintaohjelma_muutokset-vs-lausuntokierros-1.pdf