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Results Report:
Portugal 2021–2023

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Executive Summary

Nearly half of the nine commitments in Portugal's second action plan achieved moderate early results. While the process for co-creating Portugal's second action plan was highly collaborative, engagement with the Multi-Stakeholder Forum (MSF) and civil society was inconsistent during the implementation period. Government and civil society are working to improve the functions and strengthen representation of the MSF.

Early Results

Four of the nine commitments in Portugal's second action plan achieved moderate early results. The promising commitment to transparency and civic monitoring of COVID-19 recovery and resilience funding led to the improvement of a dedicated transparency portal to publish this information in open data formats. However, the participatory component that would have enhanced civic monitoring of the spending of these funds remained largely incomplete. The three other commitments with moderate early results aimed at implementing the single education portal with relevant education data, making improvements to Portugal's Open Data Portal, and improving compliance with Portugal's access to information regime. The five remaining commitments did not have any notable early results.

Completion

Portugal's second action plan contained nine commitments. Seven were fully or substantially completed, which is similar to the high completion rate of the first action plan. An ambitious commitment to upgrade the Portuguese register of legal entities' beneficial owners to international best practice was de facto postponed following a ruling by the Court of Justice of the European Union (CJEU) that overturned unlimited public access to beneficial ownership information.

An unclear division of responsibility by institutions to implement some commitment milestones affected implementation in places. For example, the institute managing Portugal's beneficial ownership register is still awaiting a governmental decision on how to interpret the CJEU ruling at the national level, which could have helped to advance implementation of commitment 7. The Directorate-General for Administration and Public Employment (DGAEP), the institution in charge of the State Organization Information System, and the Commission for Access to

IMPLEMENTATION AT A GLANCE

LEVEL OF COMPLETION

7/9   **Complete or substantially complete commitments**

EARLY RESULTS

4/9   **Commitments with early results**

4/9   **Commitments with moderate or significant early results**

COMPLIANCE WITH MINIMUM REQUIREMENTS

Acting according to OGP process.

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Administrative Documents (CADA) jointly led commitment 9. However, CADA does not have the authority to designate access to information focal points in every public body, as this responsibility lies with the individual institutions themselves. In the case of commitment 8, authorities managing EU funding related to COVID-19 recovery and resilience were expected to implement Integrity Pacts, but they were not designated to be responsible for implementation of this commitment, and the pacts were not developed.

Participation and Co-Creation
The Administrative Modernization Agency (AMA) is the public agency guiding the Open Government Partnership (OGP) process in Portugal since the first action plan was adopted. It coordinates the work carried out by the National Network for Open Administration (RNAA), the MSF composed of ten organizations, six from the government and four representing civil society. The RNAA organized an inclusive co-creation process yet could not maintain consistent participation of public entities and engagement with civil society partners throughout the implementation phase.

Civil society organizations did not take part in the implementation and monitoring of most action plan commitments. The point of contact and civil society representatives have agreed to review the structure and governance of RNAA and are planning to modify its regulations to expand the OGP agenda among public entities and involve a greater and more diversified range of stakeholders outside of government.[1]

Implementation in context
One public entity mentioned the effects of the COVID-19 pandemic as a factor that negatively impacted commitment implementation, in particular by readjusting its plans regarding citizen involvement and consultation.[2] During the action plan implementation, the OGP point of contact changed and reverted from the Center for Public Sector Innovation—LabX to another department within AMA. There was also a change in the board of directors at AMA during the implementation period.[3] The process of monitoring commitments by AMA and RNAA changed over the implementation period, which civil society negatively interpreted. Additionally, a civil society representative suggested that legislative elections held in January 2022 might have affected several commitments due to internal reorganizations and staff changes in the ministries.[4]

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[1] Sérgio Pepo Ramos (OGP point of contact, AMA), interview with the IRM, 13 October 2023; Karina Carvalho (TI Portugal), interview with the IRM, 27 October 2023; and Luís Vidigal (PASC), interview with the IRM, 31 October 2023.
[2] Tax Authority representatives, interview with the IRM, 13 November 2023.
[3] Patrícia Paralta (OGP point of contact, AMA), written response during pre-publication on 16 February 2024.
[4] Carvalho, interview. Parliamentary elections due for March 2024 may also challenge implementation of the next action plan in a similar manner.

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Section I: Key Observations

The analysis of Portugal's second action plan showed that a decision by the CJEU and the COVID-19 pandemic had a negative effect on commitment implementation and early results. The reduced role of Portugal's Multi-Stakeholder Forum (MSF) to monitor commitment progress over time weakened the OGP process and engagement with civil society. Throughout the action plan cycle, ongoing and meaningful collaboration with civil society improved commitments' ambitions and results. Finally, there was a need for greater collaboration between responsible institutions and clarity about institutional responsibility for commitment implementation.

Observation 1: External factors disrupted or delayed the completion of commitments and their early results.

Two cases concerning Portugal's second action plan illustrate how external factors outside the control of the Portuguese government can disrupt the implementation of commitments. Delaying the completion of commitments also substantially affects their ability to show early results, as in commitments 2 and 7, which did not show any notable early results. Additionally, a civil society representative suggested that legislative elections held in January 2022 might have affected several commitments due to internal reorganizations and staff changes inside the ministries.[5]

For instance, the continued restrictions from the COVID-19 pandemic meant the Portuguese Tax Authority did not carry out the focus group consultation and interaction with citizens,[6] further distancing the relevance to advancing open government. Instead, user feedback is now collected through a built-in satisfaction survey at the end of each interaction and, together with system statistics, is analyzed to continuously adjust the module and the information provided.[7]

The implementation of commitment 7, to develop and strengthen the Portuguese Central Register of Beneficial Owners (RCBE), was heavily affected by the judgment made by CJEU[8] on 22 November 2022.[9] Until then, Portugal had enabled public access to the RCBE one legal entity at a time, following digital authentication and indicating interest. While access to the RCBE did not change following the ruling, any evolution of the register, such as adopting the Beneficial Ownership Data Standard and interconnecting it with other databases, was canceled, and left pending the adoption and transposition of the sixth EU Anti-Money Laundering Directive, currently under discussion at the EU level.[10]

Observation 2: The reduced role of Portugal's MSF to monitor commitment progress over time weakened the OGP process and engagement with civil society.

The AMA has been the public agency guiding the Open Government Partnership (OGP) process since Portugal adopted the first action plan. It coordinates the work of the RNAA, Portugal's MSF. During co-creation, the RNAA organized an inclusive co-creation process.

However, during action plan implementation, the OGP point of contact changed and reverted from the Center for Public Sector Innovation (LabX) to another department within AMA. AMA led RNAA meetings during the first year of the action plan implementation, but there was no RNAA meeting between July 2022 and the end of the implementation period.[11] Instead, AMA

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held bilateral meetings for each commitment with the responsible entities and shared the results with RNAA members afterward.[12] An AMA representative said that during the first year of implementation, there was low attendance at monitoring meetings on specific commitments, so the model was not taken forward.[13] Insufficient oversight by RNAA as a whole and the lack of a sustained monitoring system weakened the process overall and was a lost opportunity when co-creation of the action plan had appeared to be strong. Civil society negatively interpreted the process monitoring of action plan implementation. Civil society organizations felt they largely did not participate in the implementation and monitoring of most action plan commitments. There were positive outcomes in terms of changing government practice or planting seeds for future collaboration where civil society and government collaborated in the implementation of these commitments (for example, the joint work of the Institute of Registries and Notary and Transparency International Portugal (TI Portugal) in commitment 7, or between the Commission for Access to Administrative Documents and civil society organizations in commitment 9).

Such shortcomings in the monitoring process could be overcome in the next action plan. The point of contact and civil society representatives have agreed to review the structure and governance of RNAA and are planning to modify its regulations to expand the OGP agenda among public entities and involve a greater and more diversified range of stakeholders outside of government.[14]

Observation 3: Throughout the action plan cycle, ongoing and meaningful collaboration with civil society improved commitments' ambition and results.

The design of the second OGP action plan was significantly more participatory than the previous one. The co-creation process included public outreach through multiple events and resulted in civil society organizations providing input for several commitments and becoming co-responsible for two commitments out of nine. The IRM had advised that, during implementation, implementing entities should meaningfully engage with citizens/users. When this happened, the results turned out to be more substantial in terms of changing government practice or planting seeds for future collaborations: for example, the joint work of the Institute of Registries and Notary and TI Portugal in commitment 7 or between the Commission for Access to Administrative Documents (CADA) and civil society organizations in commitment 9.

Observation 4: There is a need for greater collaboration between responsible institutions and clarity about institutional responsibility for commitment implementation.

Five commitments were assigned to only one responsible entity, while in reality, most commitments fell under several ministerial departments. For example, the institute managing Portugal's beneficial ownership register is still awaiting a governmental decision on how to interpret the CJEU ruling at the national level, which could have helped to advance the implementation of commitment 7. The Directorate-General for Administration and Public Employment (DGAEP), the institution in charge of the State Organization Information System, and CADA jointly led commitment 9. However, CADA does not have authority to designate access to information focal points in every public body, as this responsibility lies with the individual institutions themselves. In the case of commitment 8, authorities managing EU funding related to COVID-19 recovery and resilience were expected to implement Integrity

Pacts, but they were not designated as responsible for the implementation of this commitment, and the pacts were not developed.

Sound communication and cooperation between all public institutions involved in the OGP process are key to improving the design, implementation, and results of an action plan. It is important that implementing institutions have authority and command over a commitment's milestones. If a commitment requires the adoption of legislation by the parliament while the main implementing institution is a ministry, the chances for completion are limited. The same happens when civil society organizations are co-responsible for commitments that depend on the actions of public institutions.

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[5] Karina Carvalho (TI Portugal), interview with the IRM, 27 October 2023. Parliamentary elections due for March 2024 may also challenge implementation of the next action plan in a similar manner.
[6] Tax Authority representatives, interview with IRM, 13 November 2023.
[7] Tax Authority representatives, interview with IRM, 13 November 2023, and correspondence with IRM, 8 November 2023.
[8] Court of Justice of the European Union, "Press Release No 188/22," 22 November 2022, https://curia.europa.eu/jcms/upload/docs/application/pdf/2022-11/cp220188en.pdf.
[9] The CJEU ruling dealt with a case brought by two Luxembourgish companies against the Luxembourg beneficial ownership register.
[10] Institute of Registries and Notary (IRN) representatives, correspondence with IRM, 31 October 2023, and interview with IRM, 9 November 2023.
[11] "National Network for Open Administration Documentation," OGP, accessed 21 February 2024, https://ogp.eportugal.gov.pt/en/national-open-administratio-network1. After the XXII meeting on July 2022, the XXIII meeting was held on 13 November 2023 (after the end of the implementation period).
[12] Sérgio Pepo Ramos (OGP point of contact, AMA), interview with IRM, 13 October 2023; AMA representative, correspondence with IRM, 6 November 2023.
[13] Patrícia Paralta, (OGP point of contact, AMA), correspondence with IRM during pre-publication period, 16 February 2024.
[14] Ramos, interview; Carvalho, interview; and Luís Vidigal (PASC), interview with IRM, 31 October 2023.

Section II: Implementation and Early Results

The following section looks at one commitment that the IRM identified as having the strongest results from implementation. To assess early results, the IRM referred to commitments identified as promising in the Action Plan Review as a starting point. After verification of completion evidence, the IRM also considered commitments or clusters that were not determined as promising but that, as implemented, yielded predominantly positive or significant results.

Commitment 8: Enhance transparency and corruption prevention in the implementation of the Recovery and Resilience Plan

Administrative Modernization Agency (AMA); Platform of Civil Society Associations – House of Citizenship (PASC); Transparency International Portugal (TI Portugal)

Context and Objectives

This commitment aimed to increase information and public oversight of Portugal's Recovery and Resilience Plan. The plan includes €16.6 billion of funding made available by the European Union to the Portuguese State until 2026 to address the impact of COVID-19, support the digital and green transitions, and strengthen the economy. Enhancing transparency and civic monitoring of the dispersal of these funds and related public procurement could prevent corruption and ensure the money was spent effectively. The commitment built on the internationally recognized expertise of Portugal in e-procurement[15] as much as it sought to address the high corruption risks identified in this area by ensuring all procurement processes would be made available in open data.[16]

Civil society proposed the commitment, and the AMA and two civil society entities co-implemented it. It sought to increase procurement transparency and oversight, an objective included in Portugal's first action plan, which had seen limited implementation.[17] Given its ambition, scope, and collaborative management, the commitment's design demonstrated a clear open government lens and substantial potential for results. Both civil society and government shared this expectation for significant early results.[18]

Early Results: Moderate

Following implementation, the commitment showed moderate early results. The commitment had four milestones on enhancing transparency and access to information as well as promoting civic monitoring of the funds. Milestones to publish data on the Mais Transparência portal, promote its use, and link data to the BASE procurement portal were completed, whereas the milestone on civic monitoring remained underdeveloped.

A new version of the Mais Transparência portal was launched in March 2022 (it was originally launched in April 2021[19]). The Portuguese government announced that it includes greater detail on public expenditure related to the European funds.[20] It continued that it would be possible to consult detailed and regularly updated data on each project (such as contracts, the status of

the physical and financial execution of contracts, shareholders, and beneficiaries). It said this is the first time that this information allowed the public to consult the evolution of all investments integrated into the Recovery and Resilience Plan and be able to cross-reference it (such as searching for investment values by region or geographic areas covered by a given project). An AMA representative said that information is disclosed about planned values and contracts' execution in real time, from investments and responsible institutions to projects and final beneficiaries.[21] The information on public procurement—global amounts, information about projects and beneficiaries disaggregated and searchable by region and locality, project thematic areas and financial value, responsible public entities and final beneficiaries, etc.—is published in open data formats, including tables and basic graphics and visualization dashboards and is downloadable/exportable. An AMA representative said that by the end of 2023, the Mais Transparência portal witnessed 249,117 visits to its dedicated Recovery and Resilience Plan section. This represents over half the total number of website visits that year (570,959 visits). The AMA representative also shared general user statistics and feedback from users of the Mais Transparência portal, indicating an increase from 32,705 users in 2021 to 254,966 in 2023.[22] Annual usability tests helped to improve the interface and usability of the portal.[23] According to a civil society representative, the portal is a work in progress that still needs to be developed further, including on information about the Recovery and Resilience Plan (PRR) and on sharing data about users.[24]

Regarding outreach, communication, and awareness-raising activities (milestone 2), AMA reported that a properly defined communication strategy was in place, including a webinar in May 2023 attended by 160 participants.[25] Civil society representatives considered that communication activities were insufficient and had little dedicated budget.[26] According to AMA,[27] the portal is widely referred to in the media, which can eventually contribute to public scrutiny of the data provided, and the government indicated a high number of visits to the portal, at least in the initial months of action plan implementation.[28] The portal was developed taking into account accessibility for citizens with disabilities or limitations and was awarded the gold seal of accessibility and usability from AMA and the National Institute for Rehabilitation.[29]

Concerning the interconnection with other data sources, the Mais Transparência portal retrieves datasets from the Open Data Portal (dados.gov) when they are published on that portal. Therefore, users can export data and dashboards from the Mais Transparência portal or be directed to their source at dados.gov.[30] Additionally, the Mais Transparência portal points to the Public Procurement portal (Base.gov) and thematic websites on Transparency in Health, Transparency in Justice, and Transparency in Tourism. Information about open competitions redirects to the Recovery and Resilience Plan (PRR) Portal.[31]

However, there are exceptions in the publication of information, and the crossing of datasets remains very limited. For instance, information about private companies contracting with the state for a given project (suppliers) is linked to Base.gov, but whether the information is available or not in Base.gov depends on the legislation in force when each contract was signed.[32] The two civil society organizations co-responsible for the commitment (TI Portugal and PASC) had encouraged data interoperability with the Public Procurement portal, the Central Register of Beneficial Owners, and the Budget Business Intelligence (BIORC). After implementation, they claimed that interconnections of the portals had not been meaningfully developed beyond a partial connection with budget data, and little or no data crossing with data on public procurement and beneficial owners had been achieved.[33] Overall, civil society

members interviewed found the quality of data insufficient and the integration of data sources underdeveloped.[34]

Milestone 3 related to civic monitoring and participation has not been implemented. A civil society representative said that civil society organizations participated in the co-creation of this commitment but were not involved in its implementation.[35] Government departments would propose the datasets for AMA to publish in the Mais Transparência portal,[36] while civil society organizations co-responsible for the commitment were not consulted on what might be most relevant to request and publish.[37] The IRM researcher did not find evidence of civic monitoring tools to facilitate the detection of irregularities in COVID-19 recovery procurement and contracts and prevent corruption, besides some visualization dashboards and graphics. The 2021–2023 Action Plan Review highlighted this milestone as being a highly important aspect of the commitment.[38] The authorities managing EU funding related to COVID-19 recovery were expected to implement Integrity Pacts, but since these authorities were not responsible for this commitment, the pacts were not prioritized to be carried out.

This commitment at the end of the implementation period had moderate early results. It increased transparency of EU recovery and resilience funding through an effort to disclose quality data in open formats. The publication of new data is expected to be sustained over time (as AMA manages the portal) as part of the continuous evolution and incorporation of new data to dados.gov and the Mais Transparência portal.[39] There is still space for improvements in the relevance, scope, and depth of the published information.

Looking Ahead

The relevant work developed by the Portuguese Public Administration around data transparency and specifically the Mais Transparência portal is expected to continue.[40] This work would benefit from greater collaboration between the portal's managing team and civil society organizations to identify priority datasets and develop visualizations and data interconnections that better consider citizens' demands.

The government could create opportunities for the public scrutiny of EU funds. As initially foreseen in the commitment, the development of Integrity Pacts and other forms of civic monitoring of public procurement, including and beyond EU funds, could be relaunched. TI Portugal has expertise in that area on large procurement projects.[41] Additionally, the Association for the Promotion and Development of the Information Society (APDSI) proposed an independent impact assessment service for PRR measures, using information and communications technologies, to prevent corruption and improve management of EU funds.[42] Finally, the government could encourage and facilitate the reuse of the information made available in the portal by civil society actors. An AMA representative indicated that starting January 2024, the Mais Transparência portal will provide information on European funding related to Portugal 2030.[43]

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[15] Karolis Granickas (Open Contracting Partnership), "Portugal: What You Need to Know about the EU's e-Procurement Champion," 16 April 2020, https://www.open-contracting.org/2020/04/16/portugal-what-you-need-to-know-about-the-eus-e-procurement-champion/.

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[16] "IRM Action Plan Review: Portugal 2021–2023," OGP, 28 March 2022, https://www.opengovpartnership.org/documents/portugal-action-plan-review-2021-2023/.

[17] "OGP Portugal Action Plan 2018-2020," OGP, 9 January 2019, https://www.opengovpartnership.org/documents/portugal-action-plan-2018-2020/.

[18] "IRM Action Plan Review: Portugal 2021–2023," OGP.

[19] "More Transparency Portal Launched," Government of Portugal, 28 April 2021, https://www.portugal.gov.pt/pt/gc22/comunicacao/noticia?i=lancado-o-portal-mais-transparencia.

[20] "New Version of the Mais Transparência Portal Launched with Greater Detail on European Funds," Government of Portugal, 21 March 2022, https://www.portugal.gov.pt/pt/gc22/comunicacao/noticia?i=lancada-nova-versao-do-portal-mais-transparencia-com-maior-detalhe-sobre-os-fundos-europeus.

[21] Administration Modernization Agency (AMA), correspondence with IRM, 6 November 2023; Portal Mais Transparência, accessed 18 November 2023, https://transparencia.gov.pt/pt/fundos-europeus/tema/.

[22] "New Version of the Mais Transparência Portal Launched with Greater Detail on European Funds," Government of Portugal. The press release indicated that Mais Transparência portal received an average of 620 daily visits from April 2021 to March 2022, with a total of more than 45,000 users and around 201,000 pages visited in that period.

[23] Mais Transparência, "Usability Testing Report 2021," 27 April 2021, https://transparencia.gov.pt/static/files/relatorio_testes_usabilidade.pdf; Mais Transparência, "Usability Testing Report 2022," 6 April 2023, https://transparencia.gov.pt/static/files/2022_04_06_relatorio_testes_usabilidade_2.pdf; Mais Transparência, "Usability Testing Report 2023," 5 April 2023, https://transparencia.gov.pt/static/files/2023_04_05_relatorio_testes_usabilidade_3.pdf.

[24] Karina Carvalho (TI Portugal), interview with IRM, 27 October 2023.

[25] Sérgio Pepo Ramos (OGP point of contact, AMA), interview with IRM, 13 October 2023. Webinar announced on the OGP Repository of Portugal: https://ogp.eportugal.gov.pt/en/portal-mais-transpar%C3%AAncia-utiliza%C3%A7%C3%A3o-de-dados-abertos.

[26] Maria Helena Monteiro (APDSI), correspondence with IRM, 16 November 2023.

[27] AMA, correspondence.

[28] "New version of the Mais Transparência Portal Launched with Greater Detail on European Funds," Government of Portugal.

[29] AMA, correspondence.

[30] AMA, correspondence.

[31] Information on open competitions: https://transparencia.gov.pt/pt/fundos-europeus/prr/contratualizacao/#contractualization_explainer_id is linked to the Recovery and Resilience Plan (PRR) portal https://recuperarportugal.gov.pt/candidaturas-prr/.

[32] Government of Portugal, "Public Affordable Housing Stock," https://transparencia.gov.pt/pt/fundos-europeus/prr/beneficiarios-projetos/projeto/C02-i05/.

[33] Carvalho, interview; Platform of Civil Society Associations (PASC) correspondence with IRM, 27 October 2023.

[34] Carvalho, interview; PASC, correspondence.

[35] Maria Helena Monteiro (Association for the Promotion and Development of the Information Society, APDSI), correspondence with IRM, 16 November 2023.

[36] AMA, correspondence.

[37] Luís Vidigal (PASC), interview with IRM, 31 October 2023.

[38] IRM Action Plan Review: Portugal 2021–2023.

[39] See the statement about the "constantly evolving platform" in Portal Mais Transparência ("The contents of the Mais Transparência Portal will cover a very wide range of thematic areas relating to the relationship between citizens and the State at its different levels (…) all of these areas are not watertight and will grow over time, ensuring the versatility of the platform," at https://transparencia.gov.pt/pt/sobre-o-portal/#about_portal_information_id). Additionally, written responses from the AMA, 6 and 10 November 2023.

[40] AMA, correspondence with IRM, 6 and 10 November 2023, and statement on Portal Mais Transparência about a "constantly evolving platform."

[41] "Integrity Pact," Transparency International Portugal, https://pactodeintegridade.transparencia.pt/integrity-pact/.

[42] Monteiro, correspondence.

[43] Patrícia Paralta, (OGP point of contact, AMA), correspondence with IRM during pre-publication period, 16 February 2024.

Section III. Participation and Co-Creation

A highly collaborative process kick-started the co-creation process of Portugal's second action plan. However, engagement with civil society was inconsistent across commitments, and engagement with the RNAA weakened toward the end of the implementation period. Recognizing these deficiencies, civil society and government members of Portugal's MSF are working to renew public entities' engagement and involve more key stakeholders.

As the OGP focal point in Portugal, the AMA continued to coordinate the work of Portugal's MSF—the RNAA—throughout the action plan cycle. Through its leading role within the RNAA, AMA led the co-creation phase, implementation, and monitoring of Portugal's second OGP action plan. AMA was also in charge of regularly uploading information on progress to the online national OGP repository and tracking tool.[44] The point of contact within the AMA changed in the final months of the implementation period, moving from LabX to another department of the agency.[45]

The RNAA was established in 2018 as the OGP MSF and has maintained the same membership and governance structure since then. It is represented by ten entities directly invited by AMA, six from the public administration, including AMA, and four from civil society. Civil society representatives feel that the limited membership, both from public entities and civil society, was an obstacle to more ambitious commitments and to better implementation and results.[46] RNAA has held regular meetings since it was established. During the co-creation phase of the second action plan, RNAA held five meetings until June 2021 to oversee the process for developing the commitments.[47] Afterward, the RNAA met four times until July 2022, with some meetings focused on monitoring and progress assessment[48] while others were dedicated to collaborative exercises and training[49] for the network.[50]

The action plan cycle started with a highly participatory development phase, in which problems to be tackled and objectives to be fulfilled were collaboratively identified in three thematic discussion forums involving citizens and civil society organizations, companies, and the Public Administration.[51] Subsequently, RNAA selected thematic areas, tested them with the members of an OGP Portugal distribution list, and incorporated further input from different stakeholders and engaged citizens.[52] Civil society proposed two of the nine final commitments.

As had happened during the previous action plan cycle, the RNAA oversaw the process of monitoring action plan implementation.[53] However, AMA adopted an enhanced role in monitoring in the last phase of implementation (beyond the RNAA meetings), during which the agency held bilateral meetings for each commitment with the responsible entities, sharing the results with RNAA members afterward.[54] For instance, the current point of contact held two online, one-hour meetings per commitment from February 2023 until the end of the implementation period.[55]

However, for some civil society organizations, there was insufficient engagement through the RNAA to effectively monitor implementation.[56] In the initial months of implementation, there were meetings between civil society and public entities (such as on commitment 7 on beneficial ownership register, 8 on transparency and monitoring of EU funds, and 9 on enhancing access

to information). Civil society also took part in RNAA meetings, which took place until July 2022 (the next RNAA meeting took place in November 2023, after the end of the implementation period).[57] Some civil society representatives considered that AMA should have invited them to bilateral monitoring meetings with implementing institutions and uphold the established calendar.[58] The government OGP point of contact and civil society representatives agree that the governance and functioning of the RNAA have to be reviewed alongside public entities' commitment to OGP and to involve more key stakeholders.[59] A modification of RNAA regulations is currently under discussion by network members.[60] Civil society organizations have requested to systematically participate in monitoring the implementation of the next action plan.

Compliance with the Minimum Requirements

The IRM assesses whether member countries met the minimum requirements under OGP's Participation and Co-Creation Standards for the purposes of procedural review.[61] During co-creation, Portugal acted according to the OGP process. The two minimum requirements listed below must achieve at least the level of "in progress" for a country to have acted according to OGP process.

Key:
Green= Meets standard
Yellow= In progress (steps have been taken to meet this standard, but standard is not met)
Red= No evidence of action

Acted according to OGP process during the implementation period?	
The government maintained an OGP repository that is online, updated at least once during the action plan cycle, and contains evidence of development and implementation of the action plan.[62]	Green
The government provided the public with information on the action plan during the implementation period.[63]	Green

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[44] Portugal's OGP online repository and tracking tool: https://ogp.eportugal.gov.pt/en/ii-panaa.

[45] In February 2023, Sérgio Pepo Ramos replaced Patrícia Paralta and Marta Cotrim as OGP Points of Contact (interview of Sérgio Pepo Ramos and Sílvia Silva (AMA) on 13 October 2023). The former Points of Contact were part of LabX, public sector innovation center of the AMA) which had been coordinating OGP work since the end of 2019. See https://labx.gov.pt/projetos-posts/national-network-for-open-administration-open-government-partnership/?lang=en.

[46] Karina Carvalho (TI Portugal), interview with IRM, 27 October 2023; and Luís Vidigal (PASC), interview with IRM, 31 October 2023.

[47] From September 2020 to September 2021, RNAA held meetings on 11 September and 13 November 2020, 22 January, 19 March, and 18 June 2021. At the meeting on 17 September 2021, the discussion included the need to specify some commitments that were still undefined. The National Network for Open Administration's meeting minutes can be found at: https://ogp.eportugal.gov.pt/en/national-open-administratio-network1. However, not all minutes are correctly referenced on this page. It is also possible to access most of the minutes in the News section of the website.

[48] See minutes of the 20th RNAA meeting of 13 July 2022, with a reduced number of participants: https://ogp.eportugal.gov.pt/documents/48760/431057/ATA-XX+Reuni%C3%A3o+RNAA.pdf/d896322e-5559-aeb0-5776-f4a259c15139.

[49] See minutes of the 19th RNAA meeting of 19 May 2022: https://ogp.eportugal.gov.pt/documents/48760/0/Ata+-+XIX+Reuni%C3%A3o+RNAA_%2819MAI22%29.pdf/84b3fc4d-e070-9ccb-f4c6-2e080fd87323.

[50] See RNAA meeting minutes publicly available at: https://ogp.eportugal.gov.pt/pt/web/guest/documentacao-rnaa .

[51] https://ogp.eportugal.gov.pt/en/noticia25.

[52] Description of the co-creation phase of the 2nd action plan: https://ogp.eportugal.gov.pt/pt/desenvolvimento-do-ii-plano-nacional-de-administra%C3%A7%C3%A3o-aberta.

[53] "IRM Portugal Transitional Results Report 2018–2020," Open Government Partnership.

[54] Sérgio Pepo Ramos (OGP point of contact, AMA), interview with IRM, 13 October 2023; AMA, correspondence with IRM, 6 November 2023.

[55] Ramos, interview.

[56] Karina Carvalho (TI Portugal), interview with IRM, 27 October 2023; Luís Vidigal (PASC), interview with IRM, 31 October 2023.

[57] "National Network for Open Administration Documentation," OGP, accessed 21 February 2024, https://ogp.eportugal.gov.pt/en/national-open-administratio-network1. After the XXII meeting on July 2022, the XXIII meeting was held on 13 November 2023 (after the end of the implementation period).

[58] Carvalho, interview. See minutes of RNAA meeting in which AMA presented the calendar of follow-up meetings by commitment to the network: https://ogp.eportugal.gov.pt/documents/48760/354484/Ata+-+XVII+Reuni%C3%A3o+RNAA.pdf/e7078c81-11d8-bb0f-fa61-462ed3ef4af7.

[59] Ramos, interview; Carvalho, interview; Vidigal, interview.

[60] Carvalho, interview; Vidigal, interview.

[61] Please note that future IRM assessment will focus on compliance with the updated OGP Co-Creation and Participation Standards that came into effect on 1 January 2022: https://www.opengovpartnership.org/ogp-participation-co-creation-standards/.

[62] "National Action Plan," OGP Portugal, https://ogp.eportugal.gov.pt/.

[63] "National Network for Open Administration Documentation," OGP.

Section IV: Methodology and IRM Indicators

This report supports members' accountability and learning through assessment of (i) the level of completion for commitments' implementation, (ii) early results for commitments with a high level of completion identified as promising or that yielded significant results through implementation, and (iii) participation and co-creation practices throughout the action plan cycle. The IRM commenced the research process after the first year of implementation of the action plan with the development of a research plan, preliminary desk research, and verification of evidence provided in the country's OGP repository.[64]

In 2022, OGP launched a consultation process to co-create a new strategy for 2023–2028.[65] The IRM will revisit its products, process, and indicators once the strategy co-creation is complete. Until then, Results Reports continue to assess the same indicators as previous IRM reports:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.[66] The level of completion for all commitments is assessed as one of the following:

- *No Evidence Available*
- *Not Started*
- *Limited*
- *Substantial*
- *Complete*

Early Results

The IRM assesses the level of results achieved from the implementation of commitments that have a clear open government lens, have a high level of completion, or show evidence of achieving early results (as defined below). It considers the expected aim of the commitment prior to its implementation, the specific country context in which the commitment was implemented, the specific policy area and the changes reported.

The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes toward:
  - improving practices, policies, or institutions governing a policy area or within the public sector,
  - enhancing the enabling environment to build trust between citizens and the state.
- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive

results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes toward:

- o improving practices, policies, or institutions governing a policy area or within the public sector, or
- o enhancing the enabling environment to build trust between citizens and the state.

- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes toward:
  - o improving practices, policies, or institutions governing a policy area or within the public sector, or
  - o enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Ana Revuelta Alonso and was reviewed by Thomas Kalinowski, IRM external expert. The IRM methodology, quality of IRM products, and review process are overseen by the IRM's International Experts Panel (IEP). The current IEP membership includes:

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

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual[67] and in Portugal's Action Plan Review 2021–2023. For more information, refer to the "IRM Overview" section of the OGP website.[68] A glossary on IRM and OGP terms is available on the OGP website.[69]

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[64] Portugal. OGP Repository. Date accessed: 18 November 2023: https://ogp.eportugal.gov.pt/.
[65] See OGP, "Creating OGP's Future Together: Strategic Planning 2023–2028," https://www.opengovpartnership.org/creating-ogps-future-together/.
[66] The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses "potential for results" and "Early Results" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology and IRM Indicators of the Action Plan Review.
[67] Independent Reporting Mechanism, *IRM Procedures Manual, V.3*, 16 September 2017, https://www.opengovpartnership.org/documents/irm-procedures-manual.
[68] Open Government Partnership, *IRM Overview,* https://www.opengovpartnership.org/irm-guidance-overview/.
[69] Open Government Partnership, *OGP Glossary*, https://www.opengovpartnership.org/glossary/.

Annex I: Commitment Data[70]

Commitment 1: Implement the single education portal

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Modest	• **Completion:** Substantial • **Early results:** Moderate

Commitment 1 sought to create a single education portal, which would aggregate all platforms and portals of public entities related to school life events in the compulsory education system in Portugal and enable free, easy, and protected access through a common authentication system adopting the principles of autenticação.gov.[71]

The Ministry of Education established the single education portal, which is operational and accessible for different profiles: Sponsor of Education, Teacher, Direction, School Services, Other Users or Entities, and Collaborator at the Ministry of Education.[72] The IRM researcher could not enter the platform to assess the scope of information provided. However, RNAA meeting notes from December 2021 state that the aggregation of 40 portals had been completed in the single education portal.[73] For example, the single education portal is integrated with the Escola 360º website. Escola 360º is an integrated student management system from pre-school to secondary education, making all administrative information relating to students available on a single platform, restricted to those involved in the student's education.[74]

Before creating the single education portal, the Ministry of Education surveyed different groups of potential users to collect their demands and identify the services that would be integrated into the portal.[75] The IRM could not verify the extent of the survey, who was consulted, and how the results fed the design of the portal. The last activity is still pending as the Ministry of Education has not yet carried out an internal assessment of the portal to make corrections and improvements. Civil society indicated that more resources would be required to develop the portal to its full capacity.[76]

In July 2022, responsibility for this commitment switched from the Directorate-General of Education and Science Statistics to the Institute of Education Financial Management after a decree from May 2022 transferred the competencies on information systems to that institute.[77]

Through the creation of the single education portal, the commitment simplified access to education-related information, and the portal can be expected to be sustained in time.

Commitment 2: Develop autonomous virtual assistance in the Portal das Finanças

• **Verifiable:** Yes • **Does it have an open government lens?** No • **Potential for results:** Unclear	• **Completion:** Substantial • **Early results:** No Notable Results

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The commitment aimed to facilitate tax information and support to citizens on tax matters by developing the virtual assistance module (cATia) embedded in the Tax and Customs Authority web portal.[78] The virtual assistant cATia had already been launched in May 2020 and was further developed during the action plan implementation period. The objective was to use technology to increase citizens' confidence in the tax collection system, enhance their voluntary compliance with tax payments, and reduce litigation.

The commitment was substantially completed with only the focus group consultation, and the interaction with citizens was not carried out as expected due to COVID-19 constraints.[79] Instead, user feedback is collected through a built-in satisfaction survey at the end of each interaction and, together with system statistics, is analyzed to continuously adjust the module and the information provided.[80] Commitment monitoring took place through five joint meetings between the Tax Authority, AMA, and its Center for Public Sector Innovation, LabX, from January 2021 to April 2023, without the involvement of civil society.[81]

According to Tax Authority representatives, cATia responds to and clarifies citizens' queries on various tax issues with a high success rate. The number of interactions with the virtual assistant has quadrupled since 2020. By August 2023, close to 30,000 taxpayers accessed the virtual assistant cATia, and, for over 87% of them, the query was solved without the need for human assistance from a Tax Authority employee to clarify their question.[82]

Since the virtual assistant provides a single point of access to all tax information and tailored assistance at any time and from anywhere with an internet connection, it potentially improves access to information for citizens who are unable to attend government offices in person. A voice component introduced makes the service more inclusive for those with visual impairments.[83]

The IRM acknowledges the Tax and Customs Authority's commitment to continuous improvement of the service, which can potentially benefit an ever-increasing number of citizens and contribute to reducing barriers between citizens and tax authorities. However, the lack of citizen and stakeholder engagement further distanced the commitment's relevance as an open government reform. There is no information yet on whether this commitment helped to increase citizens' confidence in the tax collection system, enhance their voluntary compliance with tax payments, and reduce litigation. The Tax Authority could disclose data about users' feedback and tested methods for citizen participation beyond user satisfaction statistics.[84] A commitment related to tax information could be more ambitious if it went beyond the virtual assistant to provide detailed information on tax compliance and litigation data, as well as engage with users to identify information that should be preferentially disclosed (building on commitment 3 from the first action plan).

Commitment 3: Develop inclusive service channels for accessing public services

● **Verifiable:** Yes	● **Completion:** Substantial
● **Does it have an open government lens?** No	● **Early results:** No Notable Results
● **Potential for results:** Modest	

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The objective of the commitment was to facilitate access to public services for persons with diverse physical disabilities and vulnerabilities. It aimed at improving inclusiveness in public service delivery by developing a range of channels that could respond to diverse communication needs, using multiple tools and language options.[85] The commitment was considered as a pilot project.[86]

While the commitment as written did not demonstrate its relevance to open government, in practice, AMA representatives stated that institutions had, prior to the action plan cycle, carried out a survey with public service provider entities to identify the most sought-after services, assess citizens' demand for service channels and specific needs for different types of users.[87] This consultation included some organizations working with migrants, and their views had been integrated to develop the commitment, according to the OGP point of contact.[88] Subsequently, they conducted tests with different governmental offices and lines (citizens' one-stop shops, citizen call centers, and the ePortugal portal) to design and adapt service approaches suited to the different needs and specificities of citizens.[89] An AMA representative stated that guidance and documentation have been created for public officials to learn about the techniques and tools for providing inclusive and non-discriminatory services.[90]

The development of this pilot has increased the opportunities for access to public services available to a wider range of citizens. Migrant citizens and persons with disabilities can potentially receive information about public services through telephone, video calls, and web channels, with translators and interpreters of different languages, including sign language. However, the service is not fully operational yet. The number of visits was not measured, and a communications campaign was not planned.[91] Both actions would be important to fully deploy the inclusive service channels throughout the country, regularly assess progress in their outreach, and increase people's awareness of these services.

If the pilot were extended, there could be greater opportunities to engage target groups to develop more inclusive service channels.

Commitment 4: Create a manual of best practices with standards for data interconnection

● **Verifiable:** Yes	● **Completion:** Substantial
● **Does it have an open government lens?** No	● **Early results:** No Notable Results
● **Potential for results:** Unclear	

Commitment 4 aimed to improve data interconnection between different public administration bodies by developing and disseminating a manual of best practices.

The commitment activities were mostly completed.[92] The main output was the production of the web platform Mosaico,[93] a common model and technical guidance to design and develop digital public services (including good practices, support guides, information on legal, organizational, and technological aspects, and other practical tools). It is addressed to digital public service providers, solution architects, and suppliers implementing projects for the public administration. To build Mosaico, the main public entities and different government areas were consulted.[94] The model has been widely disseminated within the public

administration, mostly through the communications plan of the General Council for Information and Communication Technologies and in workshop sessions on interoperability for public officials organized by AMA in a hybrid format.[95] AMA held a workshop to present some of the updates to the interoperability processes.[96]

Improvement of interoperability processes is ultimately measured and evaluated through the degree of satisfaction with digital public services by their users, who are citizens and companies. For this purpose, a monthly assessment is carried out and publicly available on the Open Data Portal, yet the IRM does not have further evidence about how the results of these assessments have been translated into actual improvement of interoperability processes.[97] There is no evidence at the end of the implementation of increased interaction between governmental institutions and citizens through the application of the model.[98]

As already recommended by the IRM, all projects on improving digital public services would benefit from being accompanied by actions to increase public access to information, engagement with citizens to better understand and incorporate their needs, and enhanced accountability of public entities.[99]

Commitment 5: Develop and disseminate the Dados.gov portal

● **Verifiable:** Yes	● **Completion:** Complete
● **Does it have an open government lens?** Yes	● **Early results:** Moderate
● **Potential for results:** Unclear	

The commitment sought to improve Portugal's Open Data Portal dados.gov, to which public and private organizations can upload and share data with the public under open licenses.[100] This commitment can be connected to commitment 8 as information in the portal Mais Transparência[101] is permanently updated with data available on the national Open Data Portal.

The commitment's program of activities was mostly completed.[102] There was a survey with 12 public entities that publish or reuse open data to assess their degree of maturity in data sharing and the impact of open data in economic, social, environmental, and governmental dimensions. The focus group to listen to the needs of users was composed of public entities but not citizens or civil society organizations.[103]

AMA organized several events to discuss open data in public administration and collect input from different users on their needs in terms of data and accessibility, with the aim of increasing social engagement on the issue. Workshops were mostly directed to the public sector and sometimes included private companies, developers, and academia, such as an open data webinar[104] in December 2022 and a workshop on data strategy in public administration[105] in January 2023. For Open Gov Weeks 2022 and 2023, webinars open to civil society were organized with 61 and 160 participants, respectively. In May 2023, as part of the Portuguese presidency of the Digital Nations international forum, [106] AMA held a promotional event, eMerge'23, showcasing its advances in the area of data,[107] which represented an opportunity to listen to the needs for data provision and accessibility by several types of users, from designers to academia and journalists.

To make improvements in the portal, a representative said AMA considered input collected throughout the implementation period, including in the above-mentioned events and in sessions with selected companies, local and central public sector entities, and academia.[108] According to AMA, several technical solutions were introduced in the Open Data Portal, such as previsualization of datasets, inclusion of open-source solutions, and improvements in connectivity.[109] At the time of writing the report (November 2023), 9,164 datasets had been uploaded and shared in dados.gov by 171 entities (mostly public), generating 72 reutilizations.[110] This is a notable increase from 4,723 datasets and 51 reuses of data recorded in 2021.[111]

However, in the view of civil society organizations working on data openness, the portal does not offer much new data nor improved reliability, accessibility, and reusability.[112] Some civil society organizations participated in the co-creation of this commitment and in some dissemination events but were not involved in the monitoring. Additionally, the IRM could not determine the extent of quantitative and qualitative improvements brought to the portal without a benchmark assessment prior to commitment implementation.

The development of the Open Data Portal is an ongoing and long-term project. During the action plan cycle, moderate results were shown in improving access to information.

Commitment 6: Raise awareness and build capacity on cybersecurity issues

● **Verifiable:** Yes	● **Completion:** Complete
● **Does it have an open government lens?** Yes	● **Early results:** No Notable Results
● **Potential for results:** Unclear	

Commitment 6 focused on empowering organizations and citizens on cybersecurity issues. This commitment was included in the final stages of the action plan co-creation process following the publication of a study by the Internet Society Portugal Chapter (ISOC-PT) on cybersecurity in institutions and companies in Portugal, although it did not necessarily convey civil society concerns.[113]

The commitment was fully implemented.[114] The National Cybersecurity Center published its third cybersecurity report in December 2021, analyzing attitudes, education, and awareness regarding cybersecurity and including a set of recommendations. The center carried out several awareness-raising actions and training courses on various topics related to cybersecurity and the Cybersecurity Days (C-Days 2022) from January 2021 to June 2022. Activities included a national roadshow in 2022 consisting of several sessions throughout the country on the Legal Regime for Cyberspace Security and respective regulations. Altogether, in-person initiatives reached around 700 citizens, and the online courses (MOOCs) reached more than 37,000 participants, according to AMA.[115]

The National Cybersecurity Center organized the Public Administration Cybersecurity Forum in June 2022. It was an internal event for the members of the Council for Information and Communication Technologies in Public Administration (CTIC), the structure responsible for operationalizing the national strategy and action plan for ICT in the public administration and directed by AMA.[116]

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As indicated in the Action Plan Review, the commitment did not point to clear changes in policy or government practice. Although the awareness-raising activities engaged citizens and businesses, it is not clear that the implementation of the commitment brought any early results in terms of opening up government.

Commitment 7: Enhance transparency by strengthening the Central Register of Beneficial Owners

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

- **Completion:** Limited
- **Early results:** No Notable Results

Commitment 7 aimed to develop and strengthen the Portuguese Central Register of Beneficial Owners (RCBE) following international best practices. Civil society organizations proposed the commitment, and both the Institute of Registries and Notary (IRN) and TI Portugal were responsible for its implementation. It was built around three milestones: adopting the Beneficial Ownership Data Standard, raising awareness among private entities obliged to provide information to the register, and connecting the Central Register to the Public Procurement portal and other public data sources.[117]

The implementation of this commitment was heavily affected by the judgment made by CJEU[118] on 22 November 2022. Until then, Portugal had enabled public access following digital authentication, providing an indication of interest and access one legal entity at a time. This remained the same after the CJEU ruling, according to a representative from the Registry.[119] They said that any evolution of the register, such as adopting the Beneficial Ownership Data Standard and interconnecting it with other databases, was canceled and would be determined by the sixth EU Anti-Money Laundering Directive currently under discussion and its transposition at a national level.[120]

The awareness-raising component of the commitment was implemented, with activities including making the RCBE guide language more accessible and increasing the topics in frequently asked questions available online. The IRN and TI Portugal jointly held several meetings and participated in workshops, which both entities considered was positive as it significantly contributed to information accessibility (for instance, by reviewing the manual on how to communicate to the public) and strengthened their collaboration on another project related to beneficial ownership transparency.[121] IRN also carried out publicity campaigns in the media, involving professional bodies (notaries, lawyers, and solicitors), competent authorities, and obliged entities.[122]

The fallout from the CJEU decision severely limited the completion of this commitment and its potential results. The response to the decision curbed the extent of activities conducted by IRN and TI Portugal since the other major objectives of the commitment could not be realized. The meetings between implementing entities also stopped after the CJEU ruling. However, the commitment was a positive example of collaboration between civil society and government that could be further encouraged.

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Commitment 8: Enhance transparency and corruption prevention in the implementation of the Recovery and Resilience Plan	
• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Substantial	• **Completion:** Substantial • **Early results:** Moderate

This commitment is assessed in Section II above.

Commitment 9: Promote citizenship by enhancing access to information	
• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Unclear	• **Completion:** Limited • **Early results:** Moderate

This commitment aimed at improving access to administrative and environmental information by appointing a focal point in each public entity (as foreseen by Law 26/2016 of 22 August[123]) and by improving and raising awareness about the State Organization Information System (SIOE) web portal. A dedicated working group oversaw commitment implementation, including CADA and the Directorate-General for Administration and Public Employment (DGAEP).[124]

The commitment had limited completion.[125] Milestones 1 and 2 sought to ensure all public entities designate a Person Responsible for Access to Information (RAI), advertise it on their respective websites, and conduct an awareness-raising campaign.[126] At the time of writing, 257 RAI were registered on CADA's portal, up from 49 recorded RAI before the commitment started.[127] While it is a positive trend marking a departure from previous non-compliance and reflects the impulse CADA gave to public entities through its information and dissemination campaign, the early results are moderate, considering there are nearly 6,000 existing public entities.[128] Today, a network of RAI is under construction, and public entities are expected to continue to designate their RAI over the next months.[129]

CADA's mission is to build a culture of transparency within the public administration, but it has limited powers. As the responsibility of designating persons in charge of access to information ultimately lies with the public entities themselves, achieving the commitment's expected outcomes did not rely exclusively on CADA.[130] Before the impetus from this commitment, the fact that the Portuguese legislation does not provide for any sanction to entities for not designating access to information focal points partly explains why few had done so since the adoption of the law.[131]

In a positive development, the collaboration between CADA and civil society organizations, which started as part of information and dissemination actions targeting public entities, is expected to continue in related projects such as the revision of the access to information law.[132]

For milestones 3 and 4, DGAEP, the institution responsible for the SIOE, reported advancements in the new system and portal. Improvements, guided by a technical focus

group, consisted of a new interface designed to enhance usability and accessibility for ordinary citizens, the provision of more detailed and frequently updated information, reinforced security measures and privacy safeguards, and the possibility for citizens to access their professional data using the national identity card. However, DGAEP acknowledged that the system was still in the testing phase.[133] Civil society considers that SIOE still needs to be developed and made user-friendly.[134]

DGAEP delayed the communication campaign targeting schools and higher education institutions to disseminate the functionalities of SIOE until the completion of the SIOE reformulation process, that it is robust, fully functional, and effectively used by public entities.[135] Civil society representatives stated that they held meetings with CADA but not directly with DGAEP representatives, which challenged follow-up and results assessment.[136] Implementation of milestones 3 and 4 will continue beyond the scope of the action plan cycle.

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[70] Editorial notes:
1. For commitments that are clustered: The assessment of potential for results and "Early Results" is conducted at the cluster level, rather than the individual commitment level.
2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see Portugal's action plan: https://www.opengovpartnership.org/documents/portugal-action-plan-2021-2023/.
3. For more information on the assessment of the commitments' design, see Portugal's Action Plan Review: https://www.opengovpartnership.org/documents/portugal-action-plan-review-2021-2023/.

[71] See http://autenticacao.gov.pt: Identification, authentication and digital signature of the Portuguese State. It allows to perform services and access portals of various public and private entities.

[72] Single education portal, Portuguese Repbulic, https://acesso.edu.gov.pt/sso/login.html.

[73] Minutes of RNAA Meeting on 17 December 2021, OGP, https://ogp.eportugal.gov.pt/documents/48760/0/Ata+-+XVIII+Reuni%C3%A3o+RNAA+%281%29.pdf/53f592fc-0b63-4c7c-f25f-89adcc3ed8b5.

[74] Escola 360º Portal, https://e360.edu.gov.pt/.

[75] Sérgio Pepo Ramos (OGP point of contact, AMA), interview with IRM, 13 October 2023; AMA, Open Government Partnership Multi-Stakeholder Forum Of Open Government presentation, 13 October 2023, https://ogp.eportugal.gov.pt/documents/48760/0/Portugal_II_NAP.pdf/558f5fe4-4a3a-01de-ffa7-1abc8b2f1e63.

[76] Karina Carvalho (TI Portugal), interview with IRM, 27 October 2023; Luís Vidigal (PASC), interview with IRM, 31 October 2023.

[77] Minutes of RNAA Meeting on 13 July 2022, OGP, https://ogp.eportugal.gov.pt/documents/48760/431057/ATA-XX+Reuni%C3%A3o+RNAA.pdf/d896322e-5559-aeb0-5776-f4a259c15139.

[78] Tax and Customs Authority Portal, https://www.portaldasfinancas.gov.pt/.

[79] Tax Authority representatives, interview with IRM, 13 November 2023.

[80] Tax Authority representatives, interview; Tax Authority representatives, correspondence with IRM, 8 November 2023.

[81] AMA, Open Government Partnership Multi-Stakeholder Forum Of Open Government presentation, 13 October 2023, https://ogp.eportugal.gov.pt/documents/48760/0/Portugal_II_NAP.pdf/558f5fe4-4a3a-01de-ffa7-1abc8b2f1e63.

[82] Tax Authority representatives, interview; Tax Authority representatives, correspondence.

[83] Tax Authority representatives, interview; Tax Authority representatives, correspondence.

[84] For instance, as reported by the Tax Authority in its assessment of commitment 2, Nova University undertook an external assessment of user experience using the virtual assistant concluding that it helped understand complex information about tax.

[85] Commitment's webpage in Portugal, OGP Repository, https://ogp.eportugal.gov.pt/en/Compromisso2-3.

[86] Ramos, interview with IRM, 13 October 2023; AMA's internal report on action plan implementation.

[87] AMA, correspondence with IRM, 6 November 2023.

[88] Sérgio Pepo Ramos (OGP point of contact, AMA), interview with IRM, 13 October 2023. TI Portugal had suggested prior to the commitment implementation to contact representative associations, such as Centro Português para os Refugiados and Serviço Jesuíta aos refugiados. See minutes of 14th RNAA meeting:

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https://ogp.eportugal.gov.pt/documents/48760/333192/Ata+-+XVI+Reuni%C3%A3o+RNAA.docx.pdf/f3ff463f-dabb-d5d3-af77-4a7d959562e8. The IRM does not have evidence that these or other organizations were consulted.

[89] AMA, Open Government Partnership Multi-Stakeholder Forum Of Open Government presentation, 13 October 2023, https://ogp.eportugal.gov.pt/documents/48760/0/Portugal_II_NAP.pdf/558f5fe4-4a3a-01de-ffa7-1abc8b2f1e63.

[90] Patrícia Paralta (OGP point of contact/AMA), correspondence with IRM during pre-publication period, 16 February 2024.

[91] AMA, correspondence with IRM, 6 November 2023.

[92] Commitment's webpage in Portugal, OGP Repository, https://ogp.eportugal.gov.pt/en/Compromisso2-4.

[93] Mosaico Portal, https://mosaico.gov.pt.

[94] AMA, correspondence.

[95] Ramos, interview.

[96] AMA, "Workshop CTIC – Interoperabilidade," 28 June 2023, YouTube video, https://youtu.be/2PkqAy9flJ4.

[97] Monthly assessment of Open Data Portal, https://dados.gov.pt/pt/datasets/avaliacao-de-servicos-publicos/.

[98] AMA, correspondence.

[99] "IRM Action Plan Review: Portugal 2021–2023," OGP, 28 March 2022, https://www.opengovpartnership.org/documents/portugal-action-plan-review-2021-2023/.

[100] Open Data Portal, https://dados.gov.pt/pt/docs/about_dadosgov/. The portal is dedicated to the opening of data by the Portuguese public bodies and entities, but as explained on the portal, any citizen or organization can register and upload, or reference, data that they consider to be of public interest.

[101] Portal Mais Transparência, https://transparencia.gov.pt/pt/.

[102] Commitment's webpage in Portugal, OGP Repository, https://ogp.eportugal.gov.pt/en/Compromisso2-5.

[103] AMA, correspondence with IRM, 10 November 2023; written responses from civil society representatives on 27 October and 16 November 2023.

[104] "Webinar AMA: O Sucesso em Forma de Dados Abertos" [Webinar AMA: Success in the Form of Open Data], 19 December 2022, https://dados.gov.pt/pt/posts/webinar-ama-o-sucesso-em-forma-de-dados-abertos-1/.

[105] "A AMA Dinamizou um Workshop sobre Estratégia de Dados na Administração Pública" [At AMA a Dynamic Workshop on Data Analysis in Public Administration], 27 January 2023, https://dados.gov.pt/pt/posts/a-ama-dinamizou-um-workshop-sobre-estrategia-de-dados-na-administracao-publica-ap/.

[106] Digital Nations, https://www.leadingdigitalgovs.org/.

[107] " eMerge'23 Powered by Data," YouTube video, https://www.youtube.com/watch?v=cB3uyZ_Nfn0&t=452s .

[108] Ramos, interview.

[109] Ramos, interview; AMA's internal report of action plan implementation.

[110] Data retrieved from dados.gov, accessed by the IRM researcher on 17 November 2023.

[111] Paralta, correspondence. The POC also provided information on the number of datasets and cases of reuse of data. The number of datasets increased from 2,298 in 2020, to 4,723 in 2021, to 5,624 in 2022 and finally to 9,702 by the end of 2023. There were 6 recorded cases of reuse of data in 2020, rising to 51 in 2021, 67 in 2022, and 78 in 2023.

[112] Carvalho, interview; Vidigal, interview; Maria Helena Monteiro (APDSI), correspondence with IRM, 16 November 2023.

[113] Vidigal, interview; Monteiro, correspondence. See as well ISOC-PT study: https://isoc.pt/docs/positions/2021-osse-report.pdf.

[114] Commitment's webpage in Portugal, OGP Repository, https://ogp.eportugal.gov.pt/en/Compromisso2-6.

[115] Ramos, interview; AMA, Open Government Partnership Multi-Stakeholder Forum Of Open Government presentation, 13 October 2023, https://ogp.eportugal.gov.pt/documents/48760/0/Portugal_II_NAP.pdf/558f5fe4-4a3a-01de-ffa7-1abc8b2f1e63. At the time of preparing this Results Report, the self-assessment report to the second action plan had not been published on the OGP Portugal website and was not available.

[116] AMA, Open Government Partnership Multi-Stakeholder Forum Of Open Government presentation, 13 October 2023, https://ogp.eportugal.gov.pt/documents/48760/0/Portugal_II_NAP.pdf/558f5fe4-4a3a-01de-ffa7-1abc8b2f1e63.

[117] Commitment's webpage in Portugal, OGP Repository, https://ogp.eportugal.gov.pt/en/Compromisso2-7.

[118] Court of Justice of the European Union, "Press Release No 188/22," 22 November 2022: https://curia.europa.eu/jcms/upload/docs/application/pdf/2022-11/cp220188en.pdf.

[119] Cláudia dos Santos (Institute of Registries and Notary), correspondence with IRM during pre-publication period, 16 February 2024.

[120] Institute of Registries and Notary representatives, correspondence with IRM, on 31 October 2023.

[121] Carvalho, interview; See TI Portugal's project: https://transparencia.pt/transparencia-beneficiarios-efetivos/. IRN representatives, interview with IRM, 9 November 2023.

[122] IRN, correspondence with IRM, 31 October 2023; IRN representatives, interview.

[123] Diário da República, https://diariodarepublica.pt/dr/legislacao-consolidada/lei/2021-170221049.

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[124] According to AMA, the working group was composed by CADA and DGIAEP. According to civil society representatives, TI Portugal and PASC were also part of the working group, although they did not hold any meeting with DGAEP.

[125] Commitment's webpage in Portugal, OGP Repository, https://ogp.eportugal.gov.pt/en/Compromisso2-9.

[126] CADA, correspondence with IRM, 7 November 2023; CADA representative, interview with IRM, 10 November 2023.

[127] CADA's portal accessed on 18 November 2023: https://www.cada.pt/responsavel-pelo-acesso-a-informacao.

[128] Ramos, interview; CADA representative, interview.

[129] CADA representative, interview.

[130] CADA, correspondence; CADA representative, interview.

[131] CADA representative, interview.

[132] CADA representative, interview; Carvalho, interview.

[133] DGAEP, correspondence with IRM, 20 November 2023.

[134] Carvalho, interview.

[135] DGAEP, correspondence.

[136] Carvalho, interview.

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