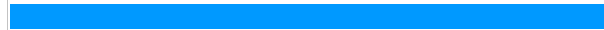


# **Independent Reporting Mechanism**

Action Plan Review:  
Italy 2024–2026



Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

# Table of Contents

Section I: Overview	2
Section II: Promising Commitments	5
Section III: Methodology and IRM Indicators	14
Annex 1: Commitment by Commitment Data	16
Annex 2: Action Plan Co-Creation	18

## Section I: Overview of the 2024–2026 Action Plan

*Italy's sixth action plan includes promising efforts to create a unified lobbying register, define national guidelines for public participation, and train public personnel on open government. The OGP IT Community widened engagement in the co-creation process. Leadership from the Public Administration Department and active collaboration to build from policy recommendations to concrete reforms could strengthen commitments' potential for results.*

Italy's sixth action plan (2024–2026) includes eight commitments, two of which were also submitted to the Open Gov Challenge (Commitments 3 and 5).<sup>1</sup> They continue previous efforts on anti-corruption, public participation, lobbying, transparency, and open data while introducing a new commitment on artificial intelligence. These commitments are contextualized by Italy's national open government strategy. The strategy was issued in December 2023 and updated in September 2024, but had not yet been officially shared with the OGP IT Community by October 2024.<sup>2</sup> The Public Administration Department (DFP) and the Open Government Forum (OGF) led the OGP process along with the Italian Community for Open Government (OGP IT).

Four of the eight commitments are promising albeit with modest potential for results. Commitment 1 seeks to create a voluntary lobbying register with public information on which lobbyists meet with government officials and the agendas discussed at those meetings. Commitments 2 and 4 aim to shift government culture by adding training on open government practices to the Competency Syllabus and Public Management Course-Competition program of the National School of Administration (SNA). Commitment 3 would produce public participation guidelines for public administrations.

The ambition of other commitments could be strengthened. Commitments 5, 6, and 7 aim to publish reports, guides, and policy recommendations on open government issues but do not sufficiently outline steps to translate their findings into concrete reforms. Commitment 8 aims to

### AT A GLANCE

**Participating since** 2011

**Action Plan under review:** 2024–2026

**IRM product:** Action Plan Review

**Number of commitments:** 8

#### **Overview of commitments:**

Commitments with an open government lens: 7 (87.5%)

Commitments with substantial potential for results: 0

Promising commitments: 4

#### **Policy areas:**

Carried over from previous action plans:

- Lobbying transparency
- Anti-corruption and integrity
- Public participation
- Open data
- Civic space
- Transparency

Emerging in this action plan:

- Artificial Intelligence

#### **Compliance with OGP minimum requirements for co-creation:**

- Acted according to OGP Process: Yes

raise awareness of gender and intergenerational inequality but does not incorporate open government mechanisms to address these issues. By the end of the design phase, some of these commitments had not yet engaged support from all of the stakeholders that may be necessary to achieve their objectives.<sup>3</sup>

The co-creation process lasted six months from February to July 2024. It began with a preparatory phase, during which the Open Government Forum and Public Administration Department identified priorities for the action plan. During three online co-creation meetings in April and May, the OGP IT Community discussed these priorities and established four overarching goals for the plan: promoting a culture of integrity, facilitating the dissemination of openness policies, enhancing transparency and open data for public value, and combating gender and intergenerational inequalities. They reflected these goals in eight commitments. In March and May 2024, they hosted five outreach webinars. The following June and July, responsible organizations collaborated asynchronously online to draft the commitments. Before finalizing the plan, a public consultation was held on 5–19 July 2024 on the ParteciPA platform. It gained responses from 14 stakeholders, including 6 new commitment ideas. The comments were reflected in the action plan but none of the commitment ideas were included.<sup>4</sup>

Stakeholders noted that the co-creation process showed improvements, benefiting from the fifth action plan's efforts to strengthen the OGP IT Community. They highlighted that continuous dialogue between public administrations (PAs) and civil society organization (CSOs) contributed to a cultural shift towards equal partnership in Italy's OGP process.<sup>5</sup> They also saw introduction of new entities to the Forum as beneficial, including the Ministry of Economy and Finance, the Digital Italy Agency, regional administrations, and new civil society organizations.<sup>6</sup> The OGP IT community had also expanded to include 99 organizations by November 2024. While there was strong collaboration between familiar faces from CSOs and PAs, challenges remained for those new to the process. There was a need to raise awareness of OGP among the wider public and clarify the co-creation process for participants beyond the Open Government Forum, as well as for the wider public.<sup>7</sup> A CSO involved in the public consultation expressed the need for increased opportunities to actively participate.<sup>8</sup> Other civil society stakeholders considered the timeframes for contribution too short.<sup>9</sup>

During the implementation period, continued political support is essential for the action plan. For commitments aiming to develop policy recommendations, stakeholders can plan actionable steps to implement those recommendations to make binding changes to current government practices. The implementation period also offers the opportunity to increase outreach activities to strengthen administrations' collaborative approach to commitments, bring stakeholders into the process who can help achieve commitments' objectives, and raise wider awareness of OGP.

---

<sup>1</sup> "Open Gov Challenge," Open Government Partnership, accessed 1 December 2024, <https://www.opengovpartnership.org/the-open-gov-challenge>.

<sup>2</sup> Laura Manconi (Project Manager, FormezPA), interview by IRM researcher, 17 October 2024.

<sup>3</sup> Manconi, interview.

<sup>4</sup> "Co-Creation Process," Italia Open Gov, accessed 19 November 2024, <https://open.gov.it/governo-aperto/piano-nazionale/6nap#co-creation-process>; Elisabetta Mauri (Facilitatrice CCIAA di Milano Monza Brianza Lodi), correspondence with IRM researcher, 10 February 2025.

<sup>5</sup> Federico Anghelè (Director, The Good Lobby), correspondence with IRM researcher, 20 November 2024; Serenella Paci (President, Italian Association for Public Participation), interview by IRM researcher, 31 October 2024; Roberto Giambelli (Advocacy Coordinator, Transparency International), interview by IRM researcher, 30 October 2024; Valentina Donini (Researcher, National School of Administration), interview by IRM researcher, 15 October 2024.

<sup>6</sup> Manconi, interview; Paci, interview.

<sup>7</sup> Manconi, interview; Luca Nervi (Director of Performance, Transparency, and Anti-Corruption, Liguria Region), interview by IRM researcher, 18 October 2024; Paola Caporossi (President, Fondazione Etica), interview by IRM researcher, 8 November 2024; Anghel , correspondence; Giambelli, interview; Mauri, correspondence.

<sup>8</sup> Mauri, correspondence.

<sup>9</sup> Paci, interview; Anghel , correspondence.

## Section II: Promising Commitments in Italy’s 2024–2026 Action Plan

The following review looks at the four 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
<b>Commitment 1: Strengthening the transparency of decision-making processes.</b> This commitment seeks to create a unified lobbying register with public information on which lobbyists meet with government officials and the agendas discussed at those meetings.
<b>Commitments 2 and 4: Strengthening open government competences.</b> This cluster of commitments aims to shift government culture by adding training on open government practices to the National School of Administration’s Competency Syllabus and Public Management Course-Competition program.
<b>Commitment 3: Strengthening the Participation Hub.</b> This commitment seeks to co-create national Public Participation Guidelines aimed at improving the effectiveness of public participation in decision-making processes.

**Commitment 1: Strengthening the transparency of decision-making processes.**

*PAs: PCM - Public Administration Department (DFP), National School of Administration (SNA)*

*CSOs: The Good Lobby, Transparency International Italia*

For a complete description, see Commitment 1 in [Italy’s 2024–2026 Action Plan](#).

**Context and objectives**

This commitment focuses on open agendas – enhancing transparency around meetings between lobbyists and government officials, as well as the agendas discussed in those meetings. The Public Administration Department (DFP) will lead implementation efforts in collaboration with the National School of Administration (SNA), the Good Lobby, and Transparency International Italy. The initiative builds on the progress made during the third and fourth action plans.<sup>1</sup> The inclusion of this commitment in the action plan is a direct results of SNA and the Good Lobby’s advocacy efforts in recent years, highlighting the importance of open agendas.<sup>2</sup>

Italy currently lacks national lobbying regulations and a unified lobbying register. Since 1976, over 50 draft laws have been proposed without success.<sup>3</sup> In 2017, the Chamber of Deputies introduced its own lobbying register – the first of its kind in Italy. Several regions, municipalities, and ministries have also taken proactive steps. The regions of Lombardia, Toscana, Puglia, Liguria, Molise, Abruzzo, and Calabria<sup>4</sup> as well as the Ministry of Agricultural, Food, and Forestry Policies, the Department of Public Administration,<sup>5</sup> and the Ministry of Enterprises and Made in Italy have voluntarily established lobbying registers. Under the third OGP action plan, the Ministry for Economic Development and the Ministry of Labor also adopted lobbying registers.<sup>6</sup> However, there is not yet a systematic approach to lobbying transparency in Italy.

Additionally, the IRM notes that the commitment includes a milestone to develop training materials on public integrity for government employees. This is analyzed in conjunction with the cluster of commitments aimed at strengthening open government competencies (Commitments 2, 3, and 4).

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

This commitment aims to establish a unified lobbying register, according to government and civil society stakeholders involved in its development. The register would publish information on lobbyists meeting with public officials, and on the meetings' objectives and minutes. As a pilot, stakeholders reported plans for the Public Administration Department to be a first user of the register, supported by ministerial endorsement.<sup>7</sup> In addition, the commitment plans to develop Guidelines for Open Agendas and integrating the new register with existing transparency registers. These guidelines would also address technical tools for publishing lobbying information.<sup>8</sup> However, the commitment's potential for results remains modest, as it does not outline plans to mandate uptake or set specific targets for the number of public administrations expected to adopt the register.

Members of the Open Government Forum (OGF) view this commitment as a significant step towards enhancing anti-corruption efforts.<sup>9</sup> An SNA representative noted that, in the absence of impartial lobbying regulations promoting transparency, access to decision-makers is often limited only to those with personal connections or the financial means.<sup>10</sup> Likewise, a representative of Transparency International emphasized that the lack of information on interactions between public officials and special interests fosters corruption, enabling decisions that disproportionately benefit certain stakeholders at the expense of the community. He added that the commitment addresses an important dimension of the problem by ensuring not only that meeting participants are recorded, but that topics discussed are also published.<sup>11</sup> Among the Italian public, a petition for lobbying transparency had garnered over 35,500 signatures by December 2024.<sup>12</sup>

Uptake of the register and guidelines would be encouraged by dissemination meetings with public administrations, according to an SNA representative.<sup>13</sup> She noted that the commitment working group is well-situated to build momentum for Open Agendas. As a branch of the presidency, the Public Administration Department can lead by example, encouraging other public administrations' adoption of Open Agendas. The Ministry of Enterprises and Made in Italy's experience launching its own register also offers valuable insights for developing the unified register.<sup>14</sup> Moreover, Avviso Pubblico<sup>15</sup> has joined the working group, bringing a coalition of 11 regional public administrations, some of which already have local Open Agendas legislation. Some of these regions have expressed interest in participating in the unified register. Avviso Pubblico can channel their expertise to support implementation and expand the reach of Open Agendas across local governments.<sup>16</sup>

While this commitment's potential for results is modest at the design phase, it could be strengthened by mandating use of the lobbying register. In parallel to the commitment, legislative efforts spearheaded by three government majority MPs have resumed,<sup>17</sup> aiming to establish binding requirements for lobbying transparency. A representative from the Good Lobby stated that despite hurdles, the proposed guidelines and registry would facilitate implementation if the legislation is passed.<sup>18</sup>

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

The success of this commitment depends on the adoption of the unified lobbying register, whether through voluntary participation or eventual legal mandates. Given that attempts at legislative reform have stretched nearly 40 years, the timeline for enacting new legislation remains uncertain. Effective oversight through the register is also critical for enhancing government accountability through this commitment. As such, the IRM recommends:

- **Mandate Open Agendas guidelines.** Lobbying transparency could be reinforced through regulations that mandate adoption of Open Agendas across government bodies. For example, until lobbying legislation is passed, incorporating requirements into the code of conduct could establish an accountability framework, including potential disciplinary measure for non-compliance.<sup>19</sup>
- **Ensure that the register is comprehensive, freely accessible, and unified,** containing clear identifying information for all existing lobbyists, reasons for visits, lobbying targets, and meeting agendas. Implementers can draw on the experiences of other OGP action plans advancing lobbying transparency in France,<sup>20</sup> Ireland,<sup>21</sup> and the city of Madrid.<sup>22</sup>
- **Establish an independent oversight body** mandated and well-resourced to oversee lobbying registration, review potential conflicts of interest, monitor compliance, address complaints, and investigate irregularities. This body could also offer guidance and training for lobbyists and public officials on lobbying transparency. A widely publicized complaint mechanism that allows anyone to report violations and to be informed of the outcomes of the complaint could also be introduced.

#### **Commitments 2 and 4: Strengthening open government competencies**

*PAs: PCM - Public Administration Department (DFP), National School of Administration (SNA), National Anti-Corruption Authority (ANAC), Emilia-Romagna Region (RER), Roma Capitale*  
*CSOs: The Good Lobby, Transparency International Italia, Libera, Italian Association for Public Participation (AIP2)*

For a complete description, see Commitments 2 and 4 of [Italy's 2024–2026 Action Plan](#).

#### **Context and objectives**

This cluster of commitments plans to train public employees and civil society organizations on open government practices by updating the National School of Administration's (SNA) Competency Syllabus and Public Management Course-Competition program.<sup>23</sup> The Course-Competition provides ad-hoc trainings for the formation of a new managerial class in public administration. It was piloted in 2024 and will be further expanded in 2025. The syllabus has existed for the past two years<sup>24</sup> and is used to regularly provide entry-level and on-the-job training for public employees (both executives and non-executives). Prior to this cluster, it covered modules on the digital and the ecological transition, and on the principles and values of public administration.<sup>25</sup> According to an SNA representative, open government topics have been taught but are not a systematic part of the syllabus.<sup>26</sup>

Commitment 4 aims to integrate open government values across all existing modules in the syllabus and the Public Management Course-Competition program. It also plans for new modules on anti-corruption. These would be based on knowledge materials to be produced by Commitments 1 and 2. on organized crime infiltration, money laundering, fraud, embezzlement, whistleblowing, conflict of interest, and revolving doors.<sup>27</sup> This would also incorporate the anti-corruption materials developed under the previous action plan.<sup>28</sup>

**Potential for results: Modest**



This cluster could help embed open government values into public administrations' ways of working.<sup>29</sup> A 2023 investigation identified a crucial need to disseminate open government skills among those managing the Italy's National Recovery and Resilience Plan (PNRR).<sup>30</sup> According to a Transparency International representative, these skills are insufficiently mainstreamed within public administrations.<sup>31</sup> An SNA representative expects the cluster to help shift civil servants' view of accountability from an external to an internal obligation.<sup>32</sup> According to a representative of the Italian Association for Public Participation (AIP2), the key barriers are insufficient knowledge and lack of specific competencies. Comprehensive training programs can facilitate such dissemination and contribute to a cultural change in the public sector.<sup>33</sup> Altogether, this cluster carries a modest potential for results as participation in the training programs remains voluntary.

Currently reaching approximately 6,000 employees annually, the trainings would continue to be open to all employees.<sup>34</sup> This cluster targets the addition of three new courses to the syllabus by December 2025. It also plans for standardization and implementation of the training program on open government for the Ninth Public Management Course-Competition by July 2025.<sup>35</sup> While there are already existing training courses on open government, the SNA plans to integrate these across modules on public leadership, particularly for executives, public managers, and civil servants.<sup>36</sup> Its objective is to ensure that no course omits crucial themes such as ethics, transparency, integrity, whistleblowing, or digitalization.<sup>37</sup>

Re-design of the syllabus would continue to incorporate civil society collaboration. According to a representative of SNA, all SNA trainings would include one or more lessons with a civil society actor leading on the field. The trainings are also expected to disseminate content produced by CSOs involved in the OGP Italy Community, which would also be offered in spaces such as the Community of Practice on the Participation Hub and Community of Practice for the public officials Responsible for Corruption Prevention and Transparency (RPCTs) at SNA.<sup>38</sup>

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

The cluster's success would hinge on leadership to engage a wide array of stakeholders in the trainings offered. Widening the reach of the trainings can also improve the work culture across government. For Italy's OGP process, this also offers an opportunity to increase visibility and engagement in OGP activities. Overall, the IRM recommends:

- **Institutionalize training programs for public employees.** Training programs could be made mandatory as a component of professional development and continuing education. Targeted outreach to new public administrations, including regional and municipal entities, could encourage participation. A credit system that awards employees for completing training modules could further incentivize participation. Alternatively, open government trainings could be integrated into existing professional development programs.
- **Expand training offerings to citizens and civil society.** Relevant training modules could be opened to the public, enabling them to learn about crucial open government topics such as conflicts of interest, whistleblowing, money laundering, fraud, embezzlement, and public participation in decision-making. This could empower civil society as watchdogs and encourage contributions to open government initiatives.

### **Commitment 3: Strengthening the Participation Hub**

*PAs: PCM – Public Administration Department (DPF), Emilia-Romagna Region (RER), Roma Capitale*

*CSOs: Italian Association for Public Participation (AIP2)*

For a complete description, see Commitment 3 of [Italy's 2024-2026 Action Plan](#).

### **Context and objectives**

This commitment seeks to co-create national Public Participation Guidelines,<sup>39</sup> and was also submitted as an Open Gov Challenge. It continues from steps taken during the previous action plan cycle. Over that period, Italy co-created the Participation Hub in 2023, to promote participation and share best practices,<sup>40</sup> and revised the 2014 Public Participation Charter, with leadership from the Italian Association for Public Participation (AIP2), Emilia-Romagna Region, and Roma Capitale.<sup>41</sup> The same stakeholders are leading this commitment, alongside the Public Administration Department. The new guidelines will build from the 12 principles outlined by the Public Participation Charter.<sup>42</sup>

In the absence of a national framework for public participation, Italy has provided sporadic opportunities for citizens involvement in policy formulation to date.<sup>43</sup> In 2020, polling by the eupinions survey showed that 66% of respondents found it difficult to participate in national politics and 48% found it difficult to participate in local politics.<sup>44</sup> Although there has not been a unified approach to participation, over the years, many regions and municipalities have promoted participatory processes, in some cases with regional laws (Emilia-Romagna, Puglia, and Tuscany Regions) or municipal regulations (Roma Capitale, City of Milan).<sup>45</sup>

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

The new Public Participation Guidelines will seek to provide a shared operational framework and minimum standards for concrete implementation of participatory processes at all levels of government across Italy.<sup>46</sup> The commitment intends to leverage the Participation Hub as a venue to iteratively develop these guidelines, building on the experiences of other national participatory best practices. Use of the Hub is meant to ensure equal collaboration between public administrations and civil society, so that the guidelines reflect the needs of all actors involved.<sup>47</sup> This process would feed into the core section of the guidelines, currently under review, which would provide direct support for the design of participatory policies.<sup>48</sup>

This commitment has institutional support from the Minister of Public Administration<sup>49</sup> and is a priority for civil society representatives, continuing from their work on the Participation Hub.<sup>50</sup> According to a government representative, the maturity of civil society and local public entities in practicing participatory democracy offers an opening to broaden civic participation initiatives.<sup>51</sup> The commitment also aligns with recent recommendations published by the European Commission in December 2023, urging Member States to promote communities' participation in policy-making processes.<sup>52</sup> However, the commitment's potential for results remains modest, as it does not outline plans to mandate uptake or set specific targets for the number of public administrations expected to adopt the guidelines.

A government representative informed the IRM that the approach to rolling out the guidelines has not been decided. The lead implementers are currently considering two options: the first involves the Public Administration Department proposing the document to public entities through a formal adherence route. The second option is to use the ParticiPA platform to conduct a public consultation to validate the guidelines, including a broader community of public and civil society actors. These actors would then voluntarily adopt the guidelines. In addition, as a branch of the

presidency, the Public Administration Department can lead by example, encouraging other public administrations' adoption of the guidelines.<sup>53</sup> According to a representative of AIP2, the uptake of the guidelines would likely remain voluntary.<sup>54</sup>

The representative of AIP2 added that the commitment's first steps had begun in 2024. By October 2024, implementers had met twice to discuss the content of the guidelines and the commitment's activities. Engagement began with Campania, Sardinia, and Trentino, and the Participation Festival in Bologna in September 2024 featured a presentation of the Public Participation Charter and six workshops to begin defining the guidelines.<sup>55</sup>

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

The success of this commitment depends on systematic adoption of its guidelines, long-term institutional will to change policymaking practices, and public awareness of new participation opportunities. The institutional support of the Public Administration Department could encourage substantial changes to public participation in the long term.<sup>56</sup> The commitment could also build on the momentum of the previous action plan. However, it may face similar challenges, like the high level of commitment required of involved stakeholders (e.g., monthly meetings, webinars and events) and capacity issues for smaller organizations.<sup>57</sup> A representative from AIP2 highlighted the need to increase awareness of public participation opportunities beyond familiar faces from CSOs and PAs.<sup>58</sup> As such, the IRM recommends:

- **Support inclusive public engagement in co-creation of the guidelines.** Implementers can look beyond civil society groups already operating within the field of open government, to widen community involvement in developing the new guidelines. It would be valuable to provide accommodations for representatives of marginalized communities, considering the significant time commitment that might be required for CSOs to participate.
- **Promote uptake of the Public Participation Guidelines.** Once the guidelines are produced, it is vital to plan concrete steps to promote its systematic use and secure sustained institutional will to change policymaking practices. Mechanisms to encourage formal adoption of the guidelines at all levels of government could be considered. Implementers could plan knowledge-sharing events for public administrations applying the guidelines. Public administrations could also regularly report on their public participation practices and solicit feedback, to ensure accountability. The Participation Hub's community of practices could be tasked with analyzing what resources CSOs need to become active in public decision-making processes. Campaigns could raise wider public awareness of new participation opportunities.

### **Other commitments**

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

Commitment 5 was submitted as an Open Gov Challenge, reflecting stakeholder support to promote inclusiveness and rights in access to technologies and in the use of artificial intelligence (AI). Through a participatory process, it intends to analyze potential negative impacts stemming from gender, intergenerational, and intersectional biases in AI algorithms and identify recommendations to mitigate these risks. However, it lacks milestones to put these

recommendations into practice. To strengthen the commitment's ambition, the IRM recommends adding activities to support the implementation of these recommendations by relevant government bodies. Implementers can draw on experiences from counterparts in the OGP Open Algorithms Network.<sup>59</sup> For instance, New Zealand formed a charter, community of practice, and practical assessment toolkit on responsible government algorithm use.<sup>60</sup> It may also be valuable to incorporate learning from this commitment into the SNA Competency Syllabus (Commitment 4). In addition, during implementation of the commitment, the IRM recommends consulting vulnerable communities who could be impacted by government use of AI.

Commitment 6 plans to produce guides directed at civil society, on the skills needed to monitor public administrations' performance, and directed at public administrations, on the data needed for this monitoring – particularly related to areas like the PNRR, public investments, and high value datasets. The commitment's milestones do not cover uptake of the guides. However, implementers are considering incorporating the guides' advice into the SNA Competency Syllabus' modules on open data, transparency, and anti-corruption (Commitment 4), and reframing the commitment based on stakeholder input.<sup>61</sup> To raise the commitment's potential for results, implementers could add activities to improve access to relevant data. They could also train non-government actors on monitoring practices, and support monitoring projects by trainees.

Commitment 7 seeks to improve the model for government transparency. This model was established by Legislative Decree No. 33/2013, but does not incorporate civic participation. It focuses on the publication of administrative acts, but not on the policies' effects on citizens' quality of life.<sup>62</sup> The commitment aims to develop a proposal for a new model, focused on publishing information on the impacts of policies and creating dedicated space for citizen participation. It also aims to experiment with dashboards to simplify and standardize the information published by the public administration.<sup>63</sup> In terms of uptake, only the Liguria region plans to adopt the model by the end of the implementation period.<sup>64</sup> The model will also be presented to ANAC, the Public Administration Department, the Conference of Regions, UPI and ANCI at a national conference,<sup>65</sup> but this may not be sufficient to support wider uptake. Given the potential value of this new transparency model, the IRM recommends broadening stakeholder engagement and pursuing uptake by a more regions and national public administrations. This could ultimately support legislative reform of the transparency model.

Commitment 8 aims to raise awareness of gender and intergenerational inequality in Italy through a permanent campaign focused on youth and women's issues.<sup>66</sup> It also plans to develop metadata on women and youth's entrepreneurship.<sup>67</sup> However, the commitment does not plan to engage these segments of the population in participatory government decision-making processes or to disclose gender or youth-related government data. Consequently, it lacks an open government lens. The commitment could improve its open government relevance by institutionalizing or mandating the publication of government data disaggregated by impacted communities, particularly open gender data, or by creating participatory accountability mechanisms to ensure resources effectively reach the communities in need.<sup>68</sup>

---

<sup>1</sup> "IRM Design Report: Italy 2019–2021," Open Government Partnership, 16 November 2020, <https://www.opengovpartnership.org/documents/italy-design-report-2019-2021>; "IRM Transitional Results Report: Italy 2019–2021," Open Government Partnership, 28 March 2022, <https://www.opengovpartnership.org/documents/italy-transitional-results-report-2019-2021>.

<sup>2</sup> Valentina Donini (Researcher, National School of Administration), interview by IRM researcher, 15 October 2024.

- <sup>3</sup> “Italy: How parliament is starting to deal with lobbyists,” Euronews, 21 March 2017, <https://www.euronews.com/2017/03/21/italy-when-just-one-chamber-of-the-parliament-gives-itself-rules-about-how-to>.
- <sup>4</sup> Federico Anghel  (Director, The Good Lobby), correspondence with IRM researcher, 20 November 2024.
- <sup>5</sup> “Evaluation Report Italy,” Group of States against Corruption, 28 August 2024, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680b16315>.
- <sup>6</sup> “IRM End-of-Term Report: Italy 2016–2018,” Open Government Partnership, 4 September 2019, <https://www.opengovpartnership.org/documents/italy-end-of-term-report-2016-2018>.
- <sup>7</sup> Donini, interview; Roberto Giambelli (Advocacy Coordinator, Transparency International), interview by IRM researcher, 30 October 2024; Federico Anghel  (Director, The Good Lobby), interview by IRM researcher, 24 October 2024.
- <sup>8</sup> Anghel , interview.
- <sup>9</sup> Donini, interview.
- <sup>10</sup> Donini, interview.
- <sup>11</sup> Giambelli, interview.
- <sup>12</sup> “Una legge sul lobbying, per il bene della democrazia” [A Law on Lobbying, For the Good of Democracy], The Good Lobby, accessed 6 December 2024, <https://www.thegoodlobby.it/campagne/lobbying-italia>.
- <sup>13</sup> Donini, interview.
- <sup>14</sup> Donini, interview.
- <sup>15</sup> “Soci” [Members], Avviso Pubblico, accessed 21 November 2024, <https://www.avvisopubblico.it/home/home/chiamiamo/soci/>.
- <sup>16</sup> Donini, interview.
- <sup>17</sup> “#Lobbying4Change: The Good Lobby leads civil society coalition for a law on lobbying in Italy,” The Good Lobby, 3 December 2024, <https://www.thegoodlobby.eu/lobbying4change-the-good-lobby-leads-civil-society-coalition-for-a-law-on-lobbying-in-italy>.
- <sup>18</sup> Anghel , interview.
- <sup>19</sup> Donini, interview.
- <sup>20</sup> “Regulation of lobbying,” High Authority for Transparency in Public Life of France, accessed 22 November 2024, <https://www.hatvp.fr/en/high-authority/regulation-of-lobbying>.
- <sup>21</sup> “Register of Lobbying,” Standards in Public Office Commission of Ireland, accessed 22 November 2024, <https://www.lobbying.ie>.
- <sup>22</sup> “A Window Into the Previously Murky World of Lobbying,” Open Government Partnership, 21 October 2021, <https://www.ogpstories.org/a-window-into-the-previously-murky-world-of-lobbying>.
- <sup>23</sup> “Sixth National Action Plan for Open Government 2024–2026,” Italia Open Gov, July 2024, <https://www.opengovpartnership.org/documents/italy-action-plan-2024-2026-june>.
- <sup>24</sup> “Syllabus – L’offerta formativa” [Syllabus – Training offering], Public Administration Department, accessed 23 November 2024, <https://www.syllabus.gov.it/portale/web/syllabus/offerta-formativa>.
- <sup>25</sup> “Syllabus – L’offerta formativa” [Syllabus – Training offering], Public Administration Department.
- <sup>26</sup> Donini, interview.
- <sup>27</sup> Anghel , correspondence.
- <sup>28</sup> Donini, interview.
- <sup>29</sup> Donini, interview.
- <sup>30</sup> “I risultati emersi dal dialogo con gli attori del PNRR” [Outcomes of dialogue with the PNRR actors], Formez PA, accessed 19 November 2024, [http://eventipa.formez.it/sites/default/files/allegati\\_eventi/Cepiku-slide-opengovPOC.pdf](http://eventipa.formez.it/sites/default/files/allegati_eventi/Cepiku-slide-opengovPOC.pdf).
- <sup>31</sup> Giambelli, interview.
- <sup>32</sup> Donini, interview.
- <sup>33</sup> Serenella Paci (President, Italian Association for Public Participation), interview by IRM researcher, 31 October 2024.
- <sup>34</sup> “Formazione” [Training], National School of Administration, accessed 24 November 2024, <https://sna.gov.it/home/attivita/formazione>.
- <sup>35</sup> “Sixth National Action Plan for Open Government 2024–2026,” Italia Open Gov.
- <sup>36</sup> Donini, interview.
- <sup>37</sup> Donini, interview.
- <sup>38</sup> Donini, interview.
- <sup>39</sup> “Sixth National Action Plan for Open Government 2024–2026,” Italia Open Gov.
- <sup>40</sup> “IRM Action Plan Review: Italy 2022–2024,” Open Government Partnership, 14 October 2022, <https://www.opengovpartnership.org/documents/italy-action-plan-review-2022-2023/>.
- <sup>41</sup> Paci, interview.
- <sup>42</sup> “Carta della Partecipazione Pubblica” [Public Participation Charter], Italian Association for Public Participation, accessed 14 April 2025, <https://www.aip2italia.org/carta-della-partecipazione-pubblica/>.
- <sup>43</sup> “Sixth National Action Plan for Open Government 2024–2026,” Italia Open Gov, July 2024, <https://www.opengovpartnership.org/documents/italy-action-plan-2024-2026-june>.

- 
- <sup>44</sup> Dominik Hierlemann, Stefan Roch, Paul Butcher, Janis A. Emmanouilidis, Corina Stratulat, Maarten De Groot, “Under Construction Citizen Participation in the European Union,” Bertelsmann Stiftung, 5 March 2022, <https://www.bertelsmann-stiftung.de/en/publications/publication/did/under-construction>
- <sup>45</sup> “Leggi regionali sulla partecipazione alle politiche pubbliche” [Regional laws on participation in public policies], ParteciPA, accessed 14 April 2025, <https://partecipa.gov.it/assemblies/hub-partecipazione/f/249/>.
- <sup>46</sup> Luca Romanini (International Relations Officer, the Presidency of the Council of Ministers), pre-publication comments, 19 March 2025.
- <sup>47</sup> Paci, interview.
- <sup>48</sup> Romanini, pre-publication comments.
- <sup>49</sup> “Sixth National Action Plan for Open Government 2024–2026,” Italia Open Gov.
- <sup>50</sup> Paci, interview.
- <sup>51</sup> Laura Manconi (Project Manager, FormezPA), interview by IRM researcher, 17 October 2024.
- <sup>52</sup> “Commission Recommendation (EU) 2023/2836 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes,” European Commission, 12 December 2023, [https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=OJ:L\\_202302836](https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=OJ:L_202302836).
- <sup>53</sup> Manconi, interview.
- <sup>54</sup> Paci, interview.
- <sup>55</sup> Paci, interview.
- <sup>56</sup> Manconi, interview.
- <sup>57</sup> “IRM Action Plan Review: Italy 2022-2024,” Open Government Partnership.
- <sup>58</sup> Paci, interview.
- <sup>59</sup> “Open Algorithms Network,” Open Government Partnership, accessed 1 April 2025, <https://www.opengovpartnership.org/about/partnerships-and-coalitions/open-algorithms-network/>.
- <sup>60</sup> “Transparency and Accountability of Government Algorithm Use,” Open Government Partnership, accessed 1 April 2025, <https://www.opengovpartnership.org/members/new-zealand/commitments/NZ0031/>.
- <sup>61</sup> Romanini, pre-publication comments.
- <sup>62</sup> Luca Nervi (Director for Performance, Transparency, and Anti-Corruption, Liguria Region), interview by IRM researcher, 18 October 2024.
- <sup>63</sup> Paola Caporossi (President, Fondazione Etica), interview by IRM researcher, 8 November 2024.
- <sup>64</sup> Nervi, interview.
- <sup>65</sup> Romanini, pre-publication comments.
- <sup>66</sup> “Sixth National Action Plan for Open Government 2024–2026,” Italia Open Gov.
- <sup>67</sup> Romanini, pre-publication comments.
- <sup>68</sup> “Gender and Inclusion,” Open Government Partnership, accessed 1 December 2024, <https://www.opengovpartnership.org/open-gov-guide/gender-and-inclusion-open-gender-data>.



## Section III: Methodology and IRM Indicators

This product is a concise, 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, represent a high priority for country stakeholders, acknowledged as a priority in the national open government context, or a combination of these factors.

The 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 the IRM identifies to inform a stronger implementation process.
- **Midpoint Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and an informal update on implementation progress.
- **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 reviews commitments using three indicators:

**1. Verifiability:** The IRM determines whether a commitment is verifiable as written in the action plan. The indicator is assessed as:

- **Yes/No:** Are the stated objectives and proposed actions sufficiently clear and include objectively verifiable activities to assess implementation?
- Commitments that are not verifiable are considered not reviewable, and no further assessment is carried out.

**2. Open Government Lens:** The IRM determines if the commitment relates to the open government values of transparency, civic participation, and/or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance. Based on a close reading of the commitment text, the indicator is assessed as:

- **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 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, influence or co-create policies, laws and/or decisions? Will the government create, enable, or improve participatory mechanisms for minorities, marginalized or underrepresented groups?

Will the government improve the enabling environment for civil society (which may include NGO laws, funding mechanisms, taxation, reporting requirements, et cetera)? Will

the government improve legal, policy, institutional or practical conditions related to civic space such as freedom of expression, association and peaceful assembly that would facilitate participation in the public sphere? Will the government take measures which counter mis- and disinformation, especially online, to ensure people have access to reliable and factual information (which may include digital and media literacy campaigns, fact-checking or fostering an independent news media ecosystem)?

- **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?

**3. Potential for Results:** The IRM analyzes the expected results and potential that would be verified in the IRM Results Report after implementation. Potential for results is an early indication of the commitment’s possibility 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 indicator is assessed 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 focuses its analysis on promising commitments. Promising commitments are verifiable, have an open government lens, and at least a modest potential for results. Promising commitments may also be a priority for national stakeholders or for the particular context. The IRM may cluster commitments with a common policy objective or that contribute to the same reform or policy issue. The potential for results of clustered commitments is reviewed as a whole.

This review was prepared by the IRM in collaboration with Laura Farci as researcher and Thomas Kalinowski as external expert reviewer. 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).<sup>1</sup> The IRM methodology, product quality, and review process are overseen by the IEP.<sup>2</sup>

---

<sup>1</sup> “International Experts Panel,” Open Government Partnership, accessed 15 July 2024, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>.

<sup>2</sup> For more information, see: “Overview – Independent Reporting Mechanism,” Open Government Partnership, accessed 15 July 2024, <https://www.opengovpartnership.org/irm-guidance-overview>.



## Annex 1: Commitment by Commitment Data<sup>1</sup>

### Commitment 1: Strengthening the transparency of decision-making processes

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

### Commitment 2: Dissemination of knowledge of phenomena threatening public decision-making integrity

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment has been clustered with Commitment 4 as: Strengthening open government competencies.
- Potential for results: Modest

### Commitment 3: Strengthening the Participation Hub

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

### Commitment 4: Definition and diffusion of skills and development of public management commitments to openness policies

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment has been clustered with Commitment 2 as: Strengthening open government competencies.
- Potential for results: Modest

### Commitment 5: Promotion of inclusiveness and rights in access to technologies and use of AI

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

### Commitment 6: Promoting the role of new technologies and data as a common good

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

### Commitment 7: Promoting a new model of transparency

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

### Commitment 8: Permanent communication/awareness campaign

- Verifiable: Yes
- Does it have an open government lens? No
- Potential for results: Unclear

---

<sup>1</sup> Editorial note: For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, not individual commitments. Commitment short titles may have been edited for brevity. For the complete text of commitments, please see: “Sixth National Action Plan for Open Government 2024–2026,” Italia Open Gov, July 2024, <https://www.opengovpartnership.org/documents/italy-action-plan-2024-2026-june>.

## Annex 2: Action Plan Co-Creation

The OGP Participation and Co-Creation Standards are guidelines to support OGP members in undertaking collaborative OGP processes.<sup>1</sup> The standards include minimum requirements that set a baseline for participatory and transparent OGP processes. In the action plan review, the IRM assesses compliance with the minimum requirements applicable during co-creation of the action plan.<sup>2</sup> Members that have not met all minimum requirements are considered acting contrary to OGP process.

Italy is acting according to OGP process, as it met all the minimum requirements applicable during development of the action plan. The IRM will assess Italy's compliance with OGP process again in two years. Members that are currently not acting according to OGP process can rectify their status by meeting the minimum requirements relevant at the next moment of assessment.<sup>3</sup>

**Table 2. Compliance with minimum requirements during co-creation**

Minimum requirement	Met?
<b>1.1 Space for dialogue:</b> Italy's Open Government Forum (OGF) has 22 members, with an equal number of public administrations and CSOs. <sup>4</sup> It is accompanied by the OGP Italy Community (OGPIT), which includes 35 public administrations and 64 CSOs. <sup>5</sup> The OGF met twice during co-creation. <sup>6</sup> The rules on participation, such as description of the mandate, regulation, membership, and meeting minutes of OGF and OGPIT, are publicly available on the Italian OGP website. <sup>7</sup>	Yes
<b>2.1 OGP website:</b> Italy has a publicly accessible OGP website, which includes all previous action plans, information on opportunities to participate, and monitoring and evaluation of the commitments. <sup>8</sup>	Yes
<b>2.2 Repository:</b> The Italian OGP website includes a publicly available repository, which was updated more than twice a year. The website contains OGF meeting minutes from the co-creation process. <sup>9</sup>	Yes
<b>3.1 Advanced notice:</b> The co-creation timeline, along with an overview of the opportunities for stakeholders to participate, was shared during a public webinar on 28 March 2024, <sup>10</sup> one month prior to the first co-creation meeting on 23 April 2024. <sup>11</sup>	Yes
<b>3.2 Outreach:</b> A public webinar on 28 March 2024 raised awareness of the OGP process and of opportunities to get involved in co-creation. <sup>12</sup> It was open to OGPIT and the public, with over 150 attendees. <sup>13</sup> During the Open Gov Week on 27–31 May 2024, <sup>14</sup> four national outreach events involved OGF members, the Open Government Task Force, PAs, CSOs, and academia.	Yes
<b>3.3 Feedback mechanism:</b> There were three online co-creation meetings, held on 23 April 23 and 23–24 May 2024, where OGF and OGPIT developed the commitments and gathered inputs from the stakeholders involved. From 5–19 July, the action plan was opened for public consultation on the ParteciPA platform. It resulted in 14 contributions and 6 new commitment suggestions from organizations external to OGPIT. Some participants felt the period was too short. <sup>15</sup>	Yes
<b>4.1 Reasoned response:</b> Stakeholders' contributions during the three co-creation meetings and OGF meetings were documented on the OGP website through news, <sup>16</sup> reports summarizing the thematic sessions, <sup>17</sup> and meeting minutes. The inputs gathered during the online public consultation were documented in a report published on 5 August 2024. <sup>18</sup> The representatives of the organizations that provided comments received replies from the POC by phone or email. <sup>19</sup> Relevant changes were made to the final version of the action plan, and the list of participating organizations was updated.	Yes

<b>5.1 Open implementation:</b> The IRM will assess whether meetings were held with civil society stakeholders to present implementation progress and enable civil society to provide comments at least twice a year.	Not applicable
---	----------------

<sup>1</sup> “OGP Participation and Co-Creation Standards,” Open Government Partnership, 24 November 2021, [www.opengovpartnership.org/ogp-participation-co-creation-standards](http://www.opengovpartnership.org/ogp-participation-co-creation-standards).

<sup>2</sup> “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, 31 May 2022, [www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements](http://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements).

<sup>3</sup> Editorial note: For two-year action plans, the IRM will assess compliance with minimum requirements applicable to implementation in the Results Report. The IRM will provide a comprehensive analysis of participation and co-creation practices throughout the action plan cycle in the Results Report. See: “OGP National Handbook – Rules and Guidance for Participants (2024),” Open Government Partnership, 11 April 2024, [www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2024](http://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2024).

<sup>4</sup> “Open Government Forum,” Italia Open Gov, accessed 19 November 2024, <https://open.gov.it/partecipa/community-ogp-italia/forum-governo-aperto>.

<sup>5</sup> “Adhering organizations to OGP IT,” Italia Open Gov, accessed 19 November 2024, <https://open.gov.it/partecipa/community-ogp-italia/organizzazioni-aderenti>.

<sup>6</sup> “Open Government Forum,” Italia Open Gov.

<sup>7</sup> “Italia Open Gov,” Italia Open Gov, accessed 19 November 2024, <https://open.gov.it>.

<sup>8</sup> “Italia Open Gov,” Italia Open Gov.

<sup>9</sup> “Italia Open Gov,” Italia Open Gov.

<sup>10</sup> “Scenarios and opportunities for open government in Italy,” Formez PA, accessed 19 November 2024, <http://eventipa.formez.it/node/450394>.

<sup>11</sup> “6th national action plan for open government,” Italia Open Gov, accessed 19 November 2024, <https://open.gov.it/governo-aperto/piano-nazionale/6nap#co-creation-process>.

<sup>12</sup> “Scenarios and opportunities for open government in Italy,” Formez PA.

<sup>13</sup> “Sixth National Action Plan for Open Government 2024–2026,” Italia Open Gov, July 2024, <https://www.opengovpartnership.org/documents/italy-action-plan-2024-2026-june>.

<sup>14</sup> “Open Gov Week 2024,” Italia Open Gov, accessed 19 November 2024, <https://open.gov.it/partecipa/open-gov-week/2024#partecipa-alla-open-gov-week-2024>.

<sup>15</sup> Federico Anghelè (Director, The Good Lobby), interview by IRM researcher, 24 October 2024; Serenella Paci (President, Italian Association for Public Participation), interview by IRM researcher, 31 October 2024; Paola Caporossi (President, Fondazione Etica), interview by IRM researcher, 8 November 2024.

<sup>16</sup> “Ai blocchi di partenza il processo di co-creazione del 6NAP!” [The 6NAP co-creation process is in the starting blocks], Italia Open Gov, 22 April 2024, <https://open.gov.it/notizie/blocchi-partenza-processo-co-creazione-6nap>; “I prossimi appuntamenti del percorso di co-creazione per definire il 6NAP. Stay tuned,” [The next appointments of the co-creation path to define the 6NAP. Stay tuned,], Italia Open Gov, 7 May 2024, <https://open.gov.it/notizie/prossimi-appuntamenti-percorso-co-creazione>.

<sup>17</sup> “Continuano i lavori del percorso di co-creazione per definire il 6NAP,” [The work on the co-creation path to define the 6NAP continues], Italia Open Gov, 7 June 2024, <https://open.gov.it/notizie/continuano-lavori-percorso-co-creazione-definire>.

<sup>18</sup> “Report finale della Consultazione sul Sesto Piano d’Azione Nazionale per il governo aperto,” [Final Report of the Consultation of the Sixth National Action Plan for Open Government], Italia Open Gov, 5 August 2024, <https://partecipa.gov.it/processes/sesto-NAP/f/338>.

<sup>19</sup> Laura Manconi (Project Manager, Formez PA), correspondence with IRM researcher, 28 November 2024.