

# **Independent Reporting Mechanism**

Sweden Co-Creation Brief  
2025

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

### Overview

This brief from the OGP's Independent Reporting Mechanism (IRM) supports the co-creation process and design of Sweden's sixth action plan. It provides an overview of OGP processes in the country and presents recommendations based on collective and country-specific IRM findings. The co-creation brief draws from prior IRM reports for [Sweden](#), the [OGP National Handbook](#), [OGP Participation and Co-Creation Standards](#), and [IRM guidance on the minimum requirements](#). Section 1 offers guidance for OGP processes and co-creation and Section 2 for commitment design. Government and civil society can determine the extent to which this brief is used to shape the next action plan's trajectory and content.

The Ministry of Finance ensured that Sweden met the minimum requirements for [OGP's Participation and Co-Creation Standards](#) during the co-creation period of the fifth action plan, a marked improvement from the [co-creation](#) and [implementation](#) of the fourth action plan. However, the dialogue between government and the civil society organizations [remained](#) limited.

For the next co-creation process, the Ministry of Finance could consider the following recommendations:

- Establish a space for government and non-government stakeholders to oversee Sweden's OGP process
- Organize more meetings with stakeholders to draft action plan commitments
- Proactively reach out a broad range of stakeholder groups during co-creation through online and in-person methods
- Publish government response to feedback received during co-creation

## Section I: Action Plan Co-Creation

The following recommendations present opportunities for national reformers to strengthen OGP institutions and processes in the country.

### Recommendation 1. Establish a space for government and non-government stakeholders to oversee Sweden's OGP process

Sweden's past co-creation processes have largely been conducted on an *ad hoc* basis or using non-OGP-specific forums focused on issues such as digitalization or development aid. Establishing a mechanism for dialogue for action plan co-creation and implementation has been a consistent recommendation for Sweden's OGP process in IRM reports for the [2014–2015](#), [2016–2018](#), and [2019–2022](#) action plans.

The Ministry of Finance could broaden the ambition of the OGP process by establishing a formal or informal [multi-stakeholder forum](#) (MSF) for the co-creation of the sixth action plan. Data [shows](#) that action plans discussed regularly at an MSF have a higher rate of completion and yield more significant changes in government practices. A dedicated MSF could also convince stakeholders of the value of committing their time and resources to the OGP process. The Ministry of Finance could draw from the experiences of [Finland](#) and [Latvia](#), which have set up working groups to provide inputs for co-creation and oversee action plan implementation. The MSF's basic rules, such as its mandate, composition and governance structure, should be public. Among the OGP community, [Australia](#) and [Latvia](#) offer good examples of how to publish MSF mandates and compositions.

### Recommendation 2. Organize more meetings with stakeholders to draft action plan commitments

To co-create the previous action plan, government ministries held two consultation sessions with civil society organizations working on digitalization. For the sixth action plan, the Ministry of Finance could provide more opportunities, both in-person and online, for CSOs to propose commitments and contribute to the drafting of the action plan. To that end, it would be useful to define the topics for collaboration before the start of co-creation. The co-creation process could include follow up consultations after the initial ideas gathering phase so that stakeholders can have more time to draft the commitments. The Ministry of Finance and interested CSOs could agree on the major thematic areas during the first consultation and establish working groups with both government and non-government participants for the main commitment areas.

### Recommendation 3. Proactively reach out to a broad range of stakeholder groups during co-creation through online and in-person methods

Sweden's previous two action plans largely focused on digital governance and open data. To broaden the scope of the next action plan, the Ministry of Finance could reach out to a diverse range of groups to participate in the consultations, including stakeholders that have not participated in previous OGP processes. To identify CSOs to contact for input on the action plan, the Ministry of Finance could partner with [Formic](#), the largest civil society platform in Sweden. For example, the Finnish Ministry of Finance collected input for commitments for the 2023–2027 action plan at events such as the national CSO Academy, dedicated interviews with underrepresented organizations across Finland, and online surveys.

In addition, the Ministry of Finance could reach out to the [Swedish Association of Local Authorities and Regions](#) as well as other regional associations and CSOs to participate in the co-creation process. Given the high level of decentralization and high autonomy of local municipalities and regions, including them in the co-creation process could ensure that OGP commitments are implemented at the subnational level.

### Recommendation 4. Publish government response to feedback received during co-creation

During co-creation of the previous action plan, the Ministry of Finance presented the draft action plan to stakeholders and [answered questions](#) about commitments. To strengthen the transparency of the next action plan's co-creation, the Ministry of Finance could publish written responses that explain the reasons behind including, amending, or rejecting commitment proposals in the final action plan. Ideally, the feedback would be published well in advance before the action plan is finalized. This would provide stakeholders with adequate time to understand why commitments were included or rejected and participate in deliberations or next steps. Sweden could draw from Canada's practice, which published a [What We Heard](#) report to respond to feedback on commitment proposals received during the co-creation of its 2022–2024 action plan.

## Section II: Action Plan Design

The following recommendations offer policy areas for national actors to consider in the next action plan. They may represent opportunities for new commitments to address issues of national importance or to advance existing reforms.

### Area 1. Algorithmic transparency

Sweden's past OGP action plans focused on digital governance, achieving early results in [open data](#) and public sector [digital innovation](#). Building on this, Sweden can use the OGP process to implement the AI Commission's [proposals](#), particularly for public actors to use AI in a transparent manner to maintain citizen trust. Sweden could use the sixth action plan to pursue transparent and participatory development and implementation of AI solutions.

Specifically, Sweden could design and implement a public register of automated decision-making systems in use. The register could be central and mandatory, and Sweden could collaborate with civil society to build, assess, and use the register. To ensure that information published is understandable and usable, information could be adapted to its intended audience through varying levels of detail and use of simple language. Creating an algorithm register aligns with the European Union's [AI Act](#), which requires entering high-risk public sector algorithms in an EU-level register. Sweden could learn from the implementation of public sector algorithm registers in the [United Kingdom](#), the [Netherlands](#), and [France](#). Sweden could also consider submitting such a commitment as an [Open Gov Challenge](#) commitment to OGP.

### Area 2. Open data

Sweden's 2023–2025 action plan included a commitment to adopt and implement the [Open Data Charter](#) principles, further strengthening the country's position as a global pioneer on open data.

For the sixth action plan, the Ministry of Finance could further enhance open data by:

- Ensuring that all open data published in regional open data portals, such as the [Umeå Open Data Portal](#) and the [Helsingborg Open Data Portal](#), are discoverable or available on [Sveriges Dataportal](#), Sweden's open data portal.
- Introducing the possibility for users to rate datasets or flag missing datasets on [Sveriges Dataportal](#).
- Consulting with civil society organizations such as [Civic Tech Sweden](#) and [Open Knowledge Foundation Sweden](#) as well as the private sector to identify high-priority open data sets that are missing from [Sveriges Dataportal](#).
- Strengthening open data capacity-building programs, such as the [Data Ambassador Program](#) run by the Agency for Digital Government (DiGG).

Sweden could draw from Germany's [commitment](#) to link open budget data between the states of Schleswig-Holstein and Berlin and Ireland's [commitment](#) to improve the quality and quantity of data available on the national open data portal.

## Area 2. Lobbying transparency

As part of its 2023–2025 action plan, Sweden published the [2024–2027 Action Plan on Corruption and Undue Influence](#) in July 2024, which led to the [2025 Increased Transparency in Political Processes report](#) to the Swedish Parliament. This report recommended the introduction of a lobbying register. The [OECD](#) has also noted a lack of clear lobbying regulations in Sweden.

Sweden could use the OGP process to advance lobbying transparency by setting a long-term goal of establishing an open and mandatory register with information on interactions between lobbyists and public officials, to be completed over multiple action plans. As a start, the Ministry of Finance could include a commitment to conduct preparatory work for such a register, such as a needs analysis and mapping of relevant legislation, in collaboration with leading experts. This could include international best practices such as defining 'lobbying' and 'lobbyist', specifying a potential law's scope of application, and providing concrete recommendations for the lobbying transparency legal framework. A commitment could also include an analysis of potential barriers to establishing a lobbying register as well as strategies to address them. Sweden could draw from Ireland, which used the OGP process to implement a [commitment](#) to review and amend the country's lobbying law.

## Area 3. Political finance transparency

Sweden's 2018 [Act on Transparency of Party Financing](#) bans anonymous donations to candidates and political parties above a certain threshold and requires political parties to regularly report their finances, among other measures. However, the 2022 revelation in that five Swedish political parties [planned](#) to evade party financing laws as well as [use](#) of associations and foundations for anonymous contributions show that there is opportunity for greater transparency in political party financing.

Sweden could use the sixth action plan to further strengthen political finance transparency, for instance by:

- Requiring political parties to report on their election campaign finances. As the agency charged with receiving financial reports from political parties and candidates, the [Kammarkollegiet](#) could partner with open data experts to make political party and candidate financing data accessible, searchable, and visualized through charts and graphs.
- Building complaint channels about political finance transgressions and raising awareness among civil society, journalists, and the public.

Sweden could learn from the Netherlands, which [passed](#) amendments to the Political Parties Financing Act that limit cumulative donations from one donor, lower the threshold for disclosing donations, and require near real-time reporting of large donations, with all the information then published online.

## Area 4. Media Freedom

The laws protecting media and journalists in Sweden remain strong. In comparison to other countries, the regulatory landscape for pluralistic journalism [remains](#) favorable. However, almost 30% of journalists [report](#) having received [threats](#) and approximately 70% receiving derogatory comments. Meanwhile, the government's [draft law](#) transposing the EU anti-SLAPP Directive only covers cross-border cases. These facts suggest that there is room for greater protection of journalists.

In the sixth action plan, Sweden could strengthen the protection of journalists by expanding the draft law transposing the EU anti-SLAPP Directive to include domestic proceedings, as [recommended](#) by the European Commission in 2022. Sweden could also provide legal counsel, rights, and safety training for journalists and media workers. Involving organizations such as the [Swedish Association of Journalists](#) and [Civil Rights Defenders](#) in mapping useful training topics, inviting journalists, and holding the trainings could help ensure stakeholder interest.

The brief was reviewed by IRM senior staff for consistency, accuracy, and with a view to maximize the context-relevance and actionability of the recommendations. Where appropriate, external reviewers or members of the IRM International Experts Panel (IEP) review briefs.