Independent Reporting Mechanism

Results Report: Estonia 2022–2024

Open
Government
Partnership

Independent
Reporting
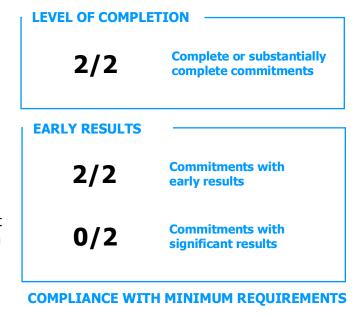Mechanism

Executive Summary

Estonia's sixth OGP action plan improved the framework for co-creative and evidence-based policymaking within the public sector. While civil society organizations actively contributed to action plan implementation, opportunities remain to improve the depth and timeliness of government feedback. The Government Office's central role effectively supported commitment ambition and completion levels. However, broadening the circle of government implementers could help build stronger ownership of future OGP action plans.

Early Results

Both commitments identified as promising in the Estonia's 2022–2024 Action Plan Review achieved moderate early results during implementation.

Estonia's sixth OGP action plan advanced both public participation and government transparency. It spurred significant advances in evidence-based policymaking (Commitment 2) with the government developing user-friendly guidelines for structured policy experiments, training public officials, and funding projects that foster experimental public sector innovation. It also paved the way for improvements in public participation (Commitment 1) by bringing government and civil society together to create an open government roadmap that offers concrete solutions to current problems in public participation.

IMPLEMENTATION AT A GLANCE

LEVEL OF COMPLETION

2/2 **Complete or substantially complete commitments**

EARLY RESULTS

2/2 **Commitments with early results**

0/2 **Commitments with significant results**

COMPLIANCE WITH MINIMUM REQUIREMENTS

Not acting according to OGP process.

Completion

The action plan contained five activities, clustered into two commitments. One sought to foster public participation in policy making, and the other sought to strengthen evidence-based policymaking. As with previous action plans, most activities were either fully or substantially completed. Successful activities, such as the creation of a framework for experimental policy making (Activity 2.1) were characterized by a holistic approach to changing public governance practices. Meanwhile, the development of an open government roadmap (Activity 1.2), while substantially completed, could benefit from a more robust implementation mechanism to ensure the sustainability of its outcome.

While ambitious in their long-term vision, commitments involving the development of digital tools did not achieve notable results during this action plan cycle. The public interface for a new digital policy co-creation tool (Activity 1.1) faced delays extending beyond the action plan cycle,[1] while the data-driven decision support system (Activity 2.2) remained in a prototyping stage, which, at the time of review, leaves its impact on government transparency uncertain.

Participation and Co-Creation

The Government Office continues to oversee the OGP process in Estonia. The Open Government Development Committee (ARVAK) acts as a multi-stakeholder forum (MSF) where government and civil society organizations (CSOs) jointly monitor action plan development and implementation. Civil society actively participated in the implementation of all commitments, with the scope and depth of participation varying. It ranged from occasional consultations to significant contributions towards implementation.

The government regularly updated CSOs on implementation progress throughout the action plan cycle. However, in the period before and after the OGP Global Summit in September 2023 (May 2023-February 2024), there were no meetings between government and civil society to discuss action plan implementation. Overall, civil society stakeholders would like to have received more in-depth and timely information during commitment implementation. They also noted that active engagement in MSF activities could be strengthened. Beyond the action plan, the government worked closely with civil society to design the agenda for the 2023 OGP Global Summit, inviting CSOs to organize their own events.

Implementation in context

Key highlights of the 2022–2024 action plan period included Estonia's co-chairing of the OGP Steering Committee and hosting of the OGP Global Summit in Tallinn in September 2023. According to the Government Office, organizing the summit was the most time- and resource-intensive activity in the action plan cycle.[2] However, with the two commitments mostly led by the Government Office, coordination during the implementation stage required minimal effort, which helped them complete most of the milestones.[3]

Estonia's success in implementing the commitments was enabled by the availability of funding, with the majority of activities financed through the European Union's Cohesion Policy funds. Meanwhile, the rapid development of large language models and generative AI further shaped the technological direction of the government's data-driven decision support tool (Activity 2.2).

 Although Estonia held parliamentary elections in 2023, the political changes did not affect action plan implementation.[4] However, the elections led to an almost year-long parliamentary deadlock.[5] In response, the government expedited the drafting of new bills at an unprecedented speed, setting extremely short deadlines for stakeholder consultations. Collectively, these circumstances undermined Estonia's own standards for good legislative practices and public participation.[6]

---

[1] Kristina Liik (Project Manager, Government Office) and Karmen Vilms (Product Owner, Ministry of Justice and Digital Affairs), interview by IRM researcher, 23 January 2025.

[2] Ott Karulin (Former OGP Point of Contact, Government Office), interview by IRM researcher, 10 December 2024.

[3] Karulin, interview.

[4] Karulin, interview.

[5] Madis Hindre, "Coalition breaks Riigikogu filibuster for first time," Estonian Public Broadcasting, 18 April 2024, https://news.err.ee/1609316562/coalition-breaks-riigikogu-filibuster-for-first-time.

[6] "Civic Space Report 2024: Estonia," Network of Estonian Nonprofit Organizations, May 2024, https://civic-forum.eu/wp-content/uploads/2024/05/CIVIC-SPACE-REPORT-2024-ESTONIA.pdf.

Table of Contents

0

Section I: Key Observations

The key observations below offer reflections from Estonia's sixth action plan cycle. These lessons aim to support Estonia's future action plans and broader open government journey.

Observation 1: Holistic approaches helped institutionalize governance reforms. The government's comprehensive approach to reforming policy-making practices delivered the action plan's most impactful results. The framework for fostering and promoting experimental policymaking (Activity 2.1) integrates multiple complementary measures. These include guidelines on policy experiments that define key concepts and highlight best practices, training programs designed to build essential skills, and updates to competence models for middle and senior managers that prioritize professional development. Additionally, funding mechanisms encourage public sector organizations to conduct experiments, providing hands-on experience with innovative policymaking methods. This cohesive policy mix of guidelines, capacity building and incentives enhances the likelihood of embedding experimental approaches as standard government practices.

Observation 2: Dedicated funding strengthened commitment implementation. Unlike most previous action plans, all major activities in this action plan received dedicated financial support, largely from EU Cohesion Policy funds, a result of both deliberate planning and favorable circumstances.[1] EU funding helped secure substantial completion and enhance the scope, scale, and quality of activities. For instance, it enabled the Government Office to hire two external experts to lead the open government expert group that co-created the open government roadmap. Without EU funding, the Government Office would not have been able to do so due to human resource constraints.[2] Similarly, EU funding allowed the Government Office to secure methodological support and partner with a private consultancy to design and implement the 'Opinion Journey' public engagement initiative.[3] Moreover, significant funding for public sector-led innovation projects from the EU Cohesion Policy Funds lowered barriers for public sector organizations and facilitated the practical adoption of novel experimental policymaking methods.[4] Given the inherent risks of failure associated with innovation amid constant budgetary pressures, government institutions may remain hesitant to fund such projects from their own budgets. In other words, the EU's financial backing significantly mitigated these challenges and therefore ensured progress.[5]

Observation 3: The Government Office's central role facilitated coordination but may have reduced other ministries' opportunities to participate in the OGP process. This action plan was largely designed and implemented by the Government Office. According to the Government Office, this approach was a deliberate decision to ensure strong implementation of a limited number of ambitious reforms as well as to save resources towards organizing the 2023 OGP Global Summit.[6] While the action plan produced early results, civil society have expressed concerns about the limited engagement of other government institutions in the OGP process, as illustrated by their modest participation in multi-stakeholder (MSF) discussions.[7] The Government Office's strong leadership of the OGP process is commendable within the context of organizing the Summit. However, there is opportunity to encourage greater involvement from ministries in future action plans. This could help mitigate the risk of declining interest in the OGP process, foster a sense of ownership, and help mainstream open government values across all levels of government.

[1] "Poliitikakujundamise kvaliteedi arendamine," [Improving the quality of policymaking], Government Office, accessed February 2025, https://www.riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/valitsuse-too-toetamine/poliitikakujundamise-kvaliteedi#; Ott Karulin (Former OGP Point of Contact, Government Office), correspondence with IRM researcher, 13 February 2025.

[2] Karulin, correspondence.

[3] Karulin, correspondence.

[4] "Toetuse andmise tingimused avaliku sektori innovatsioonivõimekuse tõstmiseks," [Conditions for granting support for increasing the innovation capacity of the public sector], Government Office, 7 December 2022, https://www.riigikantselei.ee/sites/default/files/documents/2024-07/toetuse%20andmise%20tingimused.pdf.

[5] "Minister: Next year's state budget deficit will run at 2.8 percent of GDP," Estonian Public Broadcasting, 20 September 2023, https://news.err.ee/1609105547/minister-next-year-s-state-budget-deficit-will-run-at-2-8-percent-of-gdp.

[6] Ott Karulin (Former OGP Point of Contact, Government Office), interview by IRM researcher, 10 December 2024.

[7] Marcus Ehasoo (Advocacy Lead, Network of Estonian Nonprofit Organizations), interview by IRM researcher, 18 December 2024; Maarja-Leena Saar (Expert, Estonian Cooperation Assembly), interview by IRM researcher, 13 December 2024.

Section II: Implementation and Early Results

The following section looks at the two commitments 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 took into account commitments that were not determined as promising but that, as implemented, yielded predominantly positive or significant results.

Commitment 1: Increasing co-creation in policymaking

Government Office, Ministry of Justice and Digital Affairs (previously Ministry of Justice), Ministry of Interior, Ministry of Finance.

Context and objectives

This commitment sought to enhance public participation in policymaking, with a particular focus on the early stages of policy development.[1] It aimed to advance the creation of tools, methods, and action plans, including the continuation of efforts from two previous action plans. The key objectives were: developing a government-wide digital tool for policy co-creation (Activity 1.1), updating an online public toolbox of co-creation methods and establishing an open government roadmap (Activity 1.2), and implementing a novel co-creation methodology through a nationwide public participation campaign to update the annual national development strategy action plan (Activity 1.3). This commitment mostly continued the work of the two previous action plans but added a more strategic dimension by undertaking a thorough analysis of the current public participation barriers to develop a roadmap to address the challenges.

Early Results: Moderate Results

This commitment laid positive groundwork towards improving public participation in policymaking. Its key results came from the publication of an open government roadmap (Activity 1.2) and the lessons learned from the 'Opinion Journey' public participation initiative (Activity 1.3).[2]

In March 2023, an open government roadmap was published, outlining crucial steps for implementing co-creative policymaking in the public sector (Activity 1.2). Co-created by an expert group of 15 civil society organizations (CSOs), trade unions, and employers' organizations,[3] the roadmap incorporated feedback from nearly 40 public, private, and non-governmental stakeholders.[4] According to CSOs, the roadmap effectively identifies key issues in public participation and co-creation practices while offering actionable solutions.[5] Each solution features clear objectives, designated responsible government agencies, measurable indicators, and best practice examples. However, while the roadmap's practical approach enhances its potential for implementation, its lack of legal standing and clear enforcement mechanisms may limit its impact.

Some of the roadmap's proposals have been implemented through the Government Office's co-creation accelerator program, launched in 2024. This intensive capacity-building initiative supports fixed-term co-creation projects by providing funding and counseling, although its scope remains limited.[6] Overall, while the roadmap was presented to the Open Government Development Committee (ARVAK) along with information on responsible government institutions, ARVAK has not yet systematically coordinated or monitored the roadmap's implementation.[7]

Activity 1.3 piloted a new co-creation methodology called 'Opinion Journey' (*Arvamusrännak*), developed during the previous action plan cycle, to update the "Estonia 2035" action plan for 2023. The initiative achieved geographically diverse participation. More than 1,000 citizens participated to co-create 741 different proposals on issues ranging from mental health awareness to education and rural development.[8] However, according to the former OGP Point of Contact, the proposals from the public were mostly too specific to be directly incorporated into the high-level "Estonia 2035" action plan, so the Government Office made small adjustments in the action plan's wording based on the proposals.[9] The Government Office initially documented the 2022 Opinion Journey's methodology, process, and results in detail in the initiative's website, but it has since been archived.[10] While the methodology is published on the updated website so it can be repurposed for future iterations, limited information on the 2022 iteration is available on the 'Opinion Journey' website.[11] Overall, the 'Opinion Journey' activity helped refine and promote a new co-creation method, which was used in creating a new climate law in spring 2024. However, the 'Opinion Journey' activity did not lead to its widespread adoption or significantly shape the government's strategic plans.

Some of the commitment's milestones were not fully completed. The expert group did not propose legal amendments to promote co-creative policy making, as it found that the problems do not lie in existing regulations, but in inconsistent implementation and non-compliance with regulations.[12] The Government Office aimed to add a minimum of four new co-creation methods to the online public co-creation toolbox *Koosloomeranits*, but in practice added one reference to a European Commission handbook on participatory methodologies during the action plan term, and links to four more external resources thereafter.[13] In addition, a public interface and integrated lobbying data have not yet been added to the legislative drafting and co-creation tool created under the previous two action plans (Activity 1.1)[14] because of technical complications[15] and budget constraints.[16] As of January 2025, ministries were preparing pilots to test the public interface in spring 2025,[17] and the system still allowed officials to manually add meetings with lobbyists to a policy initiative's timeline, which is encouraged by the Ministry of Justice and Digital Affairs and Government Office.[18]

Looking Ahead

The Government Office regards the open government roadmap as a key input to the next action plan cycle. Developments and updates of the policy co-creation tool and the co-creation toolbox will continue after the end of this action plan term.[19] To increase this commitment's impact, the Government Office could:
- Establish a clear mechanism for implementing the open government roadmap by designating responsibilities for the implementation of each proposal as well as overall coordination and monitoring. The Government Office has previously suggested taking the roadmap to the cabinet of ministers, who can assign specific tasks to ministries and oversee their completion.[20]
- Co-create concrete commitments for the seventh action plan along with civil society to implement the open government roadmap's proposals.
- Disseminate information on the 'Opinion Journey' method by adding its guidelines to the online co-creation toolbox and discussing the lessons learned with the ministries participating in the co-creation accelerator.[21]
- Complete the addition of a public interface and integrated lobbying data to the legislative drafting and co-creation tool, considering the open government roadmap's proposals on the tool's scope and functionalities.[22] For the next phase of the tool's development, the Ministry of Justice and Digital Affairs and Government Office could

focus on ensuring transparency and collaboration, following the principles of the government's Code of Good Practice on Public Engagement to design the process of stakeholder participation.[23] The coordinators could prioritize providing participants a timely reasoned response on how their proposals have informed the design of the tool.

- Organize civil service training and capacity building to ensure a smooth transition and wide uptake of the legislative drafting and co-creation tool by government institutions. Furthermore, the Government Office could provide practical guidelines and tailored support to civil servants and municipal governments on implementing co-creation methods.

Commitment 2: Fostering evidence-based decision-making
Government Office, Statistics Estonia, Data Protection Inspectorate, all government ministries.

Context and Objectives
This commitment aimed to strengthen evidence-based policymaking in Estonia through two activities. Firstly, it sought to develop a comprehensive piloting framework for conducting structured policy experiments and pilot programs to test policy innovations before large-scale application (Activity 2.1). Although public sector organizations occasionally conduct pilots, the public sector was lacking guidelines and support mechanisms to drive their systematic and transparent use. Secondly, the commitment sought to increase the quality and efficiency of decision-making by building an AI-assisted data-driven decision support tool for policymakers (Activity 2.2). The government regarded this project as experimental and took a step-by-step approach, planning to develop a roadmap and initial prototype as part of the sixth action plan, and expand the scope, functionalities, and user base in future action plans.[24]

Early Results: Moderate Results

Through this commitment, the Government Office developed a framework for evidence-based policymaking,[25] which has supported more collaborative policymaking (activity 2.1). It also made progress on a software tool for data-driven decision-making, but, in its current form this is intended for internal use.

The framework consists of several mutually reinforcing policy instruments: guidelines on experimental policymaking, a funding mechanism for collaborative, research-driven public sector innovation, and building public officials' skills through training and professional development. The guidelines include recommendations as well as relevant tools, resources, and case studies in a user-friendly format which facilitates their use. In addition, a €63 million public innovation fund, launched by the government, facilitated the launch of 19 innovative piloting and experimentation projects to design public policies and services, including the development of the automated data analysis tool, which is the second part of this OGP commitment.[26] The incorporation of evidence-based policymaking and co-creation into public officials' competence models and practical trainings further stimulates changes in policymaking practices and culture.[27] The IRM also notes that some milestones were not completed—integration into the government's policy impact assessment framework[28] and a memorandum to the cabinet of ministers analyzing the required changes in legislative drafting processes to enable experimental policy making.[29] The memorandum was deemed unnecessary based on expert analysis.[30]

In addition to promoting experimental policymaking, the piloting framework has encouraged collaboration between the public and non-governmental sectors. The projects supported by the funding mechanism were led by public sector organizations and often involved CSOs, research

institutions, and private companies as partners.[31] The updated competence models include co-creation among the key expectations for top and middle managers.[32] Experimental policymaking has also been included in broader civil service training programs. At the 2024 Experimentation Practicum, trainings for 35 public officials from 18 organizations centered around teamwork and engaged a number of non-governmental stakeholders as members of intersectoral teams.[33] Teamwork-based formats encouraged collaboration with stakeholders within and outside the public sector. In terms of sustainability, continued progress will be supported by robust integration of these efforts into the work of the government's public sector innovation team, which is the Government Office's permanent structural unit.

This commitment also produced a roadmap towards building a data-driven decision-making system for the government, along with a first prototype of an artificial intelligence (AI)-assisted semantic text search tool, as the first step (Activity 2.2).[34] The government discussed the roadmap with CSOs and non-governmental experts, but did not provide feedback to participants as to how their proposals helped inform the subsequent IT development process.[35] The semantic text search tool uses large language models (LLMs) to enable automated analysis of public data sources in Estonian and allows public officials to query policy-relevant data.[36] The government has started expanding public sector datasets available for analysis by the data-driven decision-making system, including assessing the possibilities of reusing public sector datasets containing personal data.[37] While the government has made the source code of the data-driven decision-making system prototype available online, the tool is only available for internal use.[38] CSOs remain hesitant about this activity's impact on open government as it remains unclear how the tool would make decision-making processes more transparent for the public and whether CSOs would have the possibility to use this system in the future.[39] The Government Office has stated the tool could potentially be opened for public use in the future if technological, legal, and resource barriers can be resolved.[40]

Looking Ahead

The roadmap on the digital data-driven decision-making system has a time horizon until 2027, and the Government Office has previously expressed the intention to continue the development in the framework of OGP action plans.[41] However, as a new Secretary of State took office in February 2025, there may be changes in the Government Office's strategic priorities.[42] The government's public sector innovation and experimental policy making funding program will continue at least until the end of 2027, while the training activities are expected to continue as part of the innovation team's work.

Moving forward, to further strengthen the positive impacts of the framework of experimental policymaking (Activity 2.1), the Government Office could:
- Adopt clear rules on the transparency of the methodology used, results achieved, and lessons learned from policy experiments. The government could focus on completing Milestone 2 and update the public administration's impact assessment framework to expressly require the publication of the results of policy experiments in accessible language and formats.
- Use the feedback collected in the experimentation practicums to tailor the Government Office's guidance on ethical aspects of policy experiments. The Government Office could also consider sharing learning materials and best practices on ethics and providing tailor-made counselling for experiments involving sensitive issues or vulnerable groups.
- Focus on creating mechanisms that ensure the sustainability of new practices and continued learning at times when EU funding for policy experiments may significantly

decrease. Such mechanisms could include training trainers, creating mentoring programs for transferring knowledge between experienced and new innovators, as well as establishing networks for sharing best practices.

In the next phases of developing the data-driven decision support system (Activity 2.2), the Government Office could:

- Use the momentum of co-creating the seventh OGP action plan to bring together stakeholders to explore how the digital decision support system and its integration with the government's policy co-creation tool (Activity 1.1) could enhance the transparency of public decision-making processes for the broader public; potentially co-designing concrete commitments for the next action plan. The discussions could also weigh the risks of increasing the use of automated data analysis for the quality and legitimacy of public decision-making.
- Design a highly participatory and transparent process of amending the Personal Data Protection Act. The process should engage civil society, legal, and ethics experts and prioritize providing timely information on the objectives and process of the legislative amendment in plain language to enable citizens to understand when and how public sector organizations can reuse the personal data stored in government databases.
- Prioritize giving adequate feedback to users and interest groups who have given input to IT development processes. Public sector IT projects could follow the guidelines on participation and feedback in the government's Good Practice on Public Engagement.[43]

[1] Open Government Partnership, Estonia Action Plan Review 2022-2024, https://www.opengovpartnership.org/wp-content/uploads/2023/03/Estonia_Action-Plan-Review-2022-2024_EN.pdf.

[2] "Avatud valitsemise teekaart," [Open Government Roadmap], Government Office, 2023, https://www.riigikantselei.ee/media/2566/download; "Arvamusrännak," [Opinion Journey], Digital Archive of National Library of Estonia, accessed December 2024, https://veebiarhiiv.digar.ee/a/20230321213926/https://arvamusrannak.ee/et.

[3] An overview of the expert group's working process and people involved is available in the roadmap. See: "Open Government Roadmap," Government Office.

[4] "Open Government Roadmap," Government Office.

[5] Marcus Ehasoo (Advocacy Lead, Network of Estonian Non-Profit Organizations), interview by IRM researcher, 18 December 2024.

[6] "Koosloome arengukiirendi," [Co-creation development accelerator], Government Office, accessed December 2024, https://www.riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/koosloomeranits/koosloome-kiirendi.

[7] Ehasoo, interview.

[8] "Arvamusrännaku strateegiapäev toob kokku poliitikakujundajad ja arutelujuhid üle Eesti," [Opinion Journey Strategy Day brings together policymakers and discussion leaders from across Estonia], Digital Archive of National Library of Estonia, 14 December 2022, https://veebiarhiiv.digar.ee/a/20230321213926/https://arvamusrannak.ee/ uudised/arvamusrannaku-strateegiapaev-toob-kokku-poliitikakujundajad-ja-arutelujuhid-ule-eesti; "Eesti avatud valitsemise partnerluse tegevuskava 2022–2024 täitmise aruanne," [Report on the Implementation of the Estonian Open Government Partnership Action Plan 2022–2024], Government Office, 21 February 2025, https://riigikantselei.ee/sites/default/files/documents/2025-02/AVP 2022-2024 aruanne LÕPLIK 21.02.2025.pdf; see Commitment 1.3 in "Open Government Partnership – Estonian Open Government Action Plan 2022–2024," Government Office, 2 September 2022, https://www.opengovpartnership.org/documents/estonia-action-plan-2022-2024. Note that the strategy day group discussions were included in the total count of 150 discussions.

[9] Ott Karulin (Former OGP Point of Contact, Government Office), correspondence with IRM researcher, 13 February 2025.

[10] "Opinion Journey," Digital Archive of National Library of Estonia. Available at: https://veebiarhiiv.digar.ee/a/20230321213926/https://arvamusrannak.ee/et

[11] "Arvamusrännak, Juhendmaterjalid," [Opinion Journey Guidance Materials], Opinion Journey, https://arvamusrannak.ee/arutelujuhile/abimaterjalid-aruteluks.

[12] "Open Government Partnership – Estonian Open Government Action Plan 2022–2024," Government Office; See Section 2 in: "Open Government Roadmap," Government Office, p. 14.

[13] "Koosloomeranits, Meetodid ja näited," [Co-Creation Methods and Examples], Government Office, accessed on 24 October 2024 & 17 February 2025, https://www.riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/koosloomeranits/meetodid-ja-naited.

[14] See Commitment 1.1 in "Open Government Partnership – Estonian Open Government Action Plan 2022–2024," Government Office.

[15] "Riigi koosloome keskkonna avaliku vaate arendustööd," [Development work on the public view of the state co-creation environment], Centre of Registers and Information Systems, 3 April 2024, https://riigihanked.riik.ee/rhr-web/ - /procurement/7165932/general-info; Kristina Liik (Project Manager, Government Office) & Karmen Vilms (Product Owner, Ministry of Justice and Digital Affairs), interview by IRM researcher, 23 January 2025.

[16] Report on the Implementation of the Estonian Open Government Partnership Action Plan 2022–2024, Government Office.

[17] Liik & Vilms, interview.

[18] Liik & Vilms, interview.

[19] Marten Lauri (OGP Point of Contact, Government Office), interview by IRM researcher, 6 February 2025.

[20] "IRM Action Plan Review: Estonia 2022–2024," Open Government Partnership.

[21] "Co-Creation Methods and Examples," Government Office; Olesk, "IRM Action Plan Review: Estonia 2022–2024," Open Government Partnership, p. 5.

[22] See Proposals 1.6 and 1.7 in "Open Government Roadmap," Government Office.

[23] "Kaasamise hea tava," [Good practice in inclusion], Government Office, 30 September 2020, https://www.riigikantselei.ee/kaasamise-hea-tava.

[24] "IRM Action Plan Review: Estonia 2022–2024," Open Government Partnership.

[25] "Katsetamise juhend avalikule sektorile," [Testing guide for the public sector], Government Office, 2023, https://katsetamine.riigikantselei.ee; "Innotiim esitleb avaliku sektori katsetamise juhendit," [Innotiim presents a guide to public sector testing], Government Office, 3 June 2023, https://www.riigikantselei.ee/uudised/innotiim-esitleb-avaliku-sektori-katsetamise-juhendit; see video recording on "Government Office," YouTube, https://www.youtube.com/live/gLxAkXGsC_8.

[26] "Avaliku sektori innovatsioonifond," [Public Sector Innovation Fund], Government Office, accessed February 2025, https://www.riigikantselei.ee/avaliku-sektori-innovatsioon; "Avaliku sektori innovatsioonifond, Projektid," [Public Sector Innovation Fund Projects], Government Office, accessed February 2025, https://www.riigikantselei.ee/avaliku-sektori-innovatsioon#uudsed-tehnoloogilis.

[27] Merle Raun, Tauno Õunapuu, Riini Saluri, and Piret Türk, "Keskastmejuhtide kompetentsimudeli uuendamine," [Updating the competency model for middle managers], Ministry of Finance, 2022, https://www.fin.ee/sites/default/files/ documents/2023-01/Keskastmejuhtide kompetentsimudeli kirjeldus_uus.pdf; Government Office, "Avaliku teenistuse tippjuhtide kompetentsimudel," [Competency model for senior civil service managers], Government Office, accessed February 2025, https://www.riigikantselei.ee/et/tippjuhtide-kompetentsimudel%20Government; "Tippjuhtide arendamine," [Top management development], Government Office, accessed February 2025, https://www.riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/avaliku-teenistuse-tippjuhid/arendamine; "Tippjuhid loovad radikaalse innovatsiooni programmis Spinnaker lahendusi ühiskonna süsteemsetele probleemidele," [Top leaders create solutions to societal systemic problems in the radical innovation program Spinnaker], Government Office, 19 August 2024, https://www.riigikantselei.ee/uudised/tippjuhid-loovad-radikaalse-innovatsiooni-programmis-spinnaker-lahendusi-uhiskonna; Report on the Implementation of the Estonian Open Government Partnership Action Plan 2022–2024, Government Office; "Avaliku teenistuse tippjuhid," [Senior civil service managers], Government Office, 20 June 2024, https://www.riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/avaliku-teenistuse-tippjuhid.

[28] "Mõjude hindamine," [Impact assessment], Government Office, accessed 3 January 2025, https://www.riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/mojude-hindamine; "Testing guide for the public sector," Government Office.

[29] Lauri, interview.

[30] Lauri, interview.

[31] "Digitaalse õppevara ja –halduskeskkondade levikumudeli ja tehnilise prototüübi loomine," [Creation of a dissemination model and technical prototype for digital learning resources and management environments], Government Office, accessed February 2025, https://www.riigikantselei.ee/digitaalse-oppevara-ja-halduskeskkondade-levikumudeli-ja-tehnilise-prototuubi-loomine; "Kaasamise ja koosloome arendustegevuste 'Koosloome arengukiirendi' toetamise tingimused ja kord," [Annex to the Secretary of State's Decree No. 14 Dated 2 April 2024], Government Office, 2 April 2024, https://www.riigikantselei.ee/sites/default/files/documents/2024-07/arendustegevuste%20tingimused%20ja%20kord.pdf.

[32] Raun, Õunapuu, Saluri, and Türk, Updating the competency model for middle managers], Ministry of Finance.

[33] "Innovatsioonitiim, Innovatsiooniprogramm," [Innovation Team, Innovation Program], Government Office, accessed February 2025, https://www.riigikantselei.ee/innotiim.

[34] See Deliverable 1.5: Roadmap, REFORM/SC2021/076 (21EE02) in PricewaterhouseCoopers EU Services EESV, "Government data-driven decision-making (DDDM) framework implementation – Test case: crisis management," Government Office, 8 February 2023, https://www.riigikantselei.ee/sites/default/files/documents/2023-02/REFORM_SC2021_076_21EE02_Deliverable%201.5_FINAL.pdf.

[35] Maarja-Leena Saar (Expert, Estonian Cooperation Assembly), interview by IRM researcher, 13 December 2024.

[36] "Poliitikakujundamise otsuste ettevalmistamist toetav tekstiandmete targa otsingu lahendus," [A smart text data search solution supporting the preparation of policy-making decisions], Government Office, accessed February 2025, https://www.riigikantselei.ee/poliitikakujundamise-otsuste-ettevalmistamist-toetav-tekstiandmete-targa-otsingu-lahendus; Erik Ernits (Chief Data Officer, Government Office), correspondence with IRM researcher, 19 December 2024; "Poliitikakujundamise otsuste ettevalmistamist toetav tekstiandmete targa otsingu lahendus, Turukonsultatsioon II etapi hanke ettevalmistuseks," [Smart text data search solution supporting the preparation of policy-making decisions, Market consultation for the preparation of the II stage procurement], Government Office, accessed February 2025, https://www.riigikantselei.ee/poliitikakujundamise-otsuste-ettevalmistamist-toetav-tekstiandmete-targa-otsingu-lahendus.

[37] Ernits, correspondence, 19 December 2024; Liisi Jürgen, "Riigi andmekogu andmete ristkasutuse võimalused IKS vaates," [Cross-use possibilities of state database data in IKS view], Government Office, 7 June 2024, https://riigikantselei.ee/sites/default/files/documents/2024-10/240607%20IKS%20§%206%20lg%205%20analüüs%20ja%20normatiivteksdi%20ettepanek.pdf.

[38] Ernits , correspondence, 19 December 2024.

[39] Riigikantselei-RAG, "Riigikantselei-RAG – Read Me," GitHub, accessed February 2025, https://github.com/buerokratt/Riigikantselei-RAG/blob/master/README.md; Riigikantselei-RAG, "Riigikantselei-RAG – License," GitHub, accessed February 2025, https://github.com/buerokratt/Riigikantselei-RAG/blob/master/LICENSE; Erik Ernits (Chief Data Officer, Government Office), correspondence with IRM researcher, 6 January 2025; Ehasoo, interview; "Quarterly advocacy report, 2/2023," Network of Estonian Non-Profit Organizations, 26 June 2023, https://heakodanik.ee/uudised/kvartaliaruanne-huvikaitsest-2-2023.

[40] "Semantiline tekstiotsing avalikest andmetest kõrge võimekusega suure keelemudeliga. Rakenduse kõrgetasemeline prototüüp (Riigikantselei), Tehniline kirjeldus," [Semantic text search of public data with a high-performance large language model. High-level prototype of the application (Government Office), Technical description], Public Procurement Register, 14 December 2023, https://riigihanked.riik.ee/rhr-web/#/procurement/6304996/documents/source-document?group=B&documentOldId=17197871.

[41] "IRM Action Plan Review: Estonia 2022–2024," Open Government Partnership.

[42] "Keit Kasemets," Government Office, accessed February 2025, https://www.riigikantselei.ee/en/organisation-news-and-contacts/government-office/secretary-state.

[43] "Good practice in inclusion," Government Office.

Section III: Participation and Co-Creation

Civil society helped co-design the action plan and had varying roles of involvement in commitment implementation. Non-governmental stakeholders received regular updates on commitment implementation, but those could have been stronger by providing more in-depth and timely information during action plan implementation. Moving forward, focusing the MSF's work on discussing open government challenges and further specifying the forum's mandate could encourage stakeholders to be more actively involved in its work.

OGP member countries are encouraged to aim for the full ambition of the updated OGP Participation and Co-Creation Standards that came into force on 1 January 2022.[1] The IRM assesses all countries that submitted action plans from 2022 onwards under the updated Standards. However, OGP instituted a 24-month grace period to ensure a fair and transparent transition. During this time, the IRM will assess countries' alignment with the Standards and compliance with the minimum requirements.[2] Therefore, countries will only be found to be acting contrary to OGP process if they do not meet the minimum requirements for submitted action plans to begin in 2024 and later.

The Government Office continues to lead the OGP process in Estonia, coordinated by an advisor of its Strategy Unit. During the implementation period, they also organized the OGP Global Summit.[3] The Open Government Development Committee (ARVAK) has served as the country's multi-stakeholder forum (MSF) since 2019, in addition to its other functions.[4] ARVAK is chaired by the Secretary of State (Government Office). Its mandate was updated in April 2024 to include supporting the Secretary of State in making funding decisions and assessing ministries' engagement in the new co-creation accelerator program (see Commitment 1).[5]

Government and civil society members of the MSF note that they could contribute more actively to the MSF's work. Focusing more on discussing open government challenges and further specifying the MSF's mandate could help increase CSO interest.[6] For example, it is unclear what instruments the MSF has at hand to call for other government institutions to follow open government practices, or whether the MSF can adopt decisions that are binding for ministries.[7] The Government Office's new OGP POC started discussions on the need to reform the MSF's composition and mandate in October 2024, discussions which will likely continue in 2025.[8]

The government engaged non-governmental stakeholders in co-creating the action plan, but the final text was mostly shaped by the Government Office, due to the limited scope of many proposals and the wish to raise the ambition of commitments.[9] CSOs made proposals on the co-creation process and timeline at the MSF and OGP Civil Society Roundtable meetings in December 2021 and February 2022.[10] The Government Office conducted an online crowdsourcing campaign from February to April 2022 to collect citizens' proposals for commitments.[11] Following the Civil Society Roundtable's proposal, the Government Office regularly updated the national OGP website with new proposals received through the online campaign, along with a summary of all 18 proposals received, along with a written reasoned response at the end of the process.[12] A discussion was also held with government institutions and civil society stakeholders who had made proposals in May 2022.[13] The Government Office shared the first draft of the action plan with the Civil Society Roundtable for comments and amendments via the roundtable's mailing list. Despite following the OGP participation and co-

creation standards, the co-creation process was shaped more by the Government Office than non-governmental stakeholders.

The Government Office gave action plan implementation updates at the MSF meetings and occasionally at the Civil Society Roundtable's meetings. In the period before and after the OGP Global Summit in September 2023 (May 2023-February 2024), no meetings were held between government and civil society to discuss action plan implementation. The action plan implementation updates that were provided were mostly quick overviews, without detailed discussions of outcomes and challenges. [14] The national OGP website maintains a commitment progress tracker containing commitment descriptions and milestone completion levels. However, CSOs would appreciate more detailed and timely information on commitment implementation progress, such as commitment activities and deviations from the original work plan.[15] A civil society representative argued that the current format of ARVAK does not allow for thorough discussions on commitment progress since meeting agendas also need to accommodate other topics related to ARVAK's mandate.[16] Non-governmental stakeholders suggest organizing more meetings between commitment implementers and the OGP Civil Society Roundtable that would focus on discussing the status of specific commitments. Additionally, stakeholders suggest clarifying the role of "supporting stakeholders" listed in the action plan as it has not been clear whether the government institutions coordinating commitments have the obligation to inform and engage partners or if the partners should be proactive in requesting information.[17]

CSOs also participated in commitment implementation but the scope and depth of engagement varied. Two independent civil society experts led the development of the open government roadmap, while the expert group co-creating the roadmap involved more non-governmental than governmental stakeholders.[18] Assigning leadership roles to recognized open government experts from outside public sector merits highlighting as a good practice that facilitated a balanced process. Beyond the scope of this action plan, the government designed the agenda of the OGP Global Summit in close collaboration with civil society and encouraged CSOs to organize their events as part of the summit.

Table 1. Compliance with minimum requirements

Minimum requirement	Met during co-creation?	Met during implementation?
1.1 Space for dialogue: The Open Government Development Committee (ARVAK) serves as a permanent multi-stakeholder forum (MSF) of governmental and non-governmental stakeholders, overseeing the development and implementation of OGP action plans. Its composition has been published on the national OGP website.[19] The committee's mandate has been specified in the Secretary of State's decree of December 2019, which is available in the Government Office's public document register. The MSF held five meetings during the action plan implementation cycle (in November 2022, February and May 2023, February and June 2024).[20] The members of the MSF also met informally in September 2023, after the OGP Global Summit.	Yes	Yes
2.1 OGP website: The Government Office maintains a dedicated OGP website, which is publicly accessible and	Yes	Yes

contains the most recent as well as all previous action plans.[21]		
2.2 Repository: The OGP website includes a public repository which has information both on the co-creation and implementation of the sixth action plan.[22] The repository was updated at least twice a year during the implementation period.	Yes	Yes
3.1 Advanced notice: See the Action Plan Review[23]	Yes	Not applicable
3.2 Outreach: See the Action Plan Review	Yes	Not applicable
3.3 Feedback mechanism: See the Action Plan Review	Yes	Not applicable
4.1 Reasoned response: See the Action Plan Review	Yes	Not applicable
5.1 Open implementation: The government and civil society members of the MSF discussed commitment implementation at the MSF meetings of November 2022, February and May 2023.[24] Civil society stakeholders also discussed action plan implementation with the OGP Point of Contact at the OGP Civil Society Roundtable's meetings in October 2022 and February 2023.[25] The period after the May 2023 MSF meeting coincided with the preparations for the Summit in October 2023, which occupied a lot of the government's time and resources, so the MSF did not meet again until after the Summit in February 2024. The minimum requirement states that the MSF must hold at least two meetings per year to discuss action plan implementation and collect comments from CSOs. While the MSF and OGP Civil Society Roundtable met five times during the first year of implementation (June 2022 – June 2023), and there was increased government-civil society collaboration around the OGP Global Summit, there was only one MSF meeting to discuss action plan implementation during the second year of implementation (July 2023 – June 2024). Therefore, the minimum requirement is assessed as not being met.	Not applicable	No

---

[1] "OGP Participation and Co-Creation Standards," https://www.opengovpartnership.org/ogp-participation-co-creation-standards/.

[2] Independent Reporting Mechanism, *Guidelines for the Assessment of OGP's Minimum Requirements*, May 2022. https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.

[3] Ott Karulin (Former OGP Point of Contact, Government Office), interview by IRM researcher, 10 December 2024.

[4] "Avatud riigivalitsemise arengukomisjoni moodustamine, käskkiri (43)," [Establishment of the Open Government Development Committee, decree (43)], Government Office, 3 December 2019, https://dhs.riigikantselei.ee/avalikteave.nsf/documents/NT00352532/%24file/RS1943.pdf.

[5] "Koosloome arengukiirendi," [Co-creation Development Accelerator], Government Office, accessed February 2025, https://www.riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/koosloomeranits/koosloome-kiirendi.

[6] Karulin, interview; Marcus Ehasoo (Advocacy Lead, Network of Estonian Non-Profit Organizations), interview by IRM researcher, 18 December 2024; "IRM Results Report: Estonia 2020–2022," Open Government Partnership, 30 May 2023, https://www.opengovpartnership.org/documents/estonia-results-report-2020-2022.

[7] Ehasoo, interview.

[8] Marten Lauri (OGP Point of Contact, Government Office) interview by IRM researcher, 21 November 2024.

[9] "IRM Action Plan Review: Estonia 2022–2024," Open Government Partnership, 9 March 2023, https://www.opengovpartnership.org/documents/estonia-action-plan-review-2022-2024.

[10] See "Minutes of the MSF meeting," Government Office, 7 December 2021, https://dhs.riigikantselei.ee/avalikteave.nsf/documents/NT0039053A?open; "Minutes of the MSF meeting," Government Office, 15 February 2022, https://dhs.riigikantselei.ee/avalikteave.nsf/documents/NT00396F0A/%24file/ARVAK22P1.pdf.

[11] "Riigikantselei kutsub osalema ideekorjel," [The Government Office invites you to participate in the idea collection], Government Office, 22 February 2022, http://www.avatudvalitsemine.ee/uudised/riigikantselei-kutsub-osalema-ideekorjel.

[12] "Eesti avatud valitsemise partnerluse tegevuskava 2022–2024 ideekorjele esitatud ettepanekud," [Proposals submitted for the Estonian Open Government Partnership Action Plan 2022–2024 idea collection], Government Office, accessed February 2025, https://www.riigikantselei.ee/media/1814/download.

[13] Eesti avatud valitsemise partnerluse tegevuskava 2022-2024 ideekorjele esitatud ettepanekud [Proposals submitted for the Estonian Open Government Partnership Action Plan 2022–2024 idea], Government Office, https://www.riigikantselei.ee/media/1814/download; "Minutes of the MSF meeting," Government Office, 3 May 2022, https://dhs.riigikantselei.ee/avalikteave.nsf/documents/NT0039F966/%24file/ARVAK22P2.pdf.

[14] Minutes of the meetings are available on the Government Office's public document repository at https://dhs.riigikantselei.ee/avalikteave.nsf/protocolsbyissuer?open&path=Avatud riigivalitsemise arengukomisjon.

[15] "Open Government Partnership – Estonian Open Government Action Plan 2022–2024", 2 September 2022, https://www.opengovpartnership.org/documents/estonia-action-plan-2022-2024Government Office, https://www.riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/valitsuse-too-toetamine/avatud-valitsemise-partnerlus; Ehasoo, interview.

[16] Ehasoo, interview.

[17] Maarja-Leena Saar (Expert, Estonian Cooperation Assembly), interview by IRM researcher, 13 December 2024.

[18] "Avatud valitsemise teekaart," [Open Government Roadmap], Government Office, 2023, https://www.riigikantselei.ee/media/2566/download.

[19] "Open Government Partnership – Estonian Open Government Action Plan 2022–2024," Government Office.

[20] "Establishment of the Open Government Development Committee, decree (43)," Government Office; Minutes of the meetings are available on the Government Office's public document repository at https://dhs.riigikantselei.ee/avalikteave.nsf/protocolsbyissuer?open&path=Avatud riigivalitsemise arengukomisjon.

[21] "Open Government Partnership – Estonian Open Government Action Plan 2022–2024," Government Office.

[22] "Open Government Partnership – Estonian Open Government Action Plan 2022–2024," Government Office.

[23] Open Government Partnership, Estonia Action Plan Review 2022-2024, https://www.opengovpartnership.org/documents/estonia-action-plan-review-2022-2024/.

[24] See Minutes of the MSF meetings on 23 November 2022, 15 February and 23 May 2023, and 19 February 2024 at dhs.riigikantselei.ee/avalikteave.nsf/protocolsbyissuer?open&path=Avatud%20riigivalitsemise%20arengukomisjon.

[25] Karulin, interview; Lauri, interview; Ehasoo, interview.

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.[1] 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.[2]

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.[3] 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, 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 towards:
  - 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 towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - 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 towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - 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 Maarja Olesk and was reviewed by Thomas Kalinowski, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM's International Experts Panel (IEP).[4] For more information, refer to the "IRM Overview" section of the OGP website.[5] A glossary on IRM and OGP terms is available on the OGP website.[6]

---

[1] For definitions of OGP terms, such as co-creation and promising commitments, see "OGP Glossary,"

[2] "Estonia OGP Repository," Government Office, accessed: 21 January 2025, https://www.riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/valitsuse-too-toetamine/avatud-valitsemise-partnerlus.

[3] 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.

[4] Open Government Partnership, Independent Reporting Mechanism, *International Experts Panel*, https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/

[5] Open Government Partnership, *IRM Overview* https://www.opengovpartnership.org/irm-guidance-overview/

[6] Open Government Partnership, *OGP Glossary*,

Annex I: Commitment Data[1]

Commitment 1: Increasing co-creation in policymaking	
Verifiable: Yes **Does it have an open government lens?** Yes - This commitment has been clustered as: Increasing co-creation in policy-making (activities 1.1, 1.2, and 1.3 of the action plan) **Potential for results:** Substantial	**Completion:** Substantial **Early results:** Moderate Results
This commitment is assessed in Section II above.	

Commitment 2: Fostering evidence-based decision-making	
Verifiable: Yes **Does it have an open government lens?** Yes - This commitment has been clustered as: Fostering evidence-based decision-making (activities 2.1 and 2.2 of the action plan) **Potential for results:** Substantial	**Completion:** Substantial **Early results:** Moderate Results
This commitment is assessed in Section II above.	

---

[1] 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 Estonia's action plan: https://www.opengovpartnership.org/documents/estonia-action-plan-2022-2024/
3. For more information on the assessment of the commitments' design, see Estonia's Action Plan Review: Open Government Partnership, Estonia Action Plan Review 2022-2024, https://www.opengovpartnership.org/documents/estonia-action-plan-review-2022-2024/.