

# Independent Reporting Mechanism

Midterm Review:  
Finland 2023-2027

Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

## Key Findings

At the midpoint, Finland's 2023–2027 action plan is progressing. The commitments on National Dialogues, Civil Society Academies, and the Open Democracy Network are progressing fastest. During the midterm refresh, the Fifth Open Government Working Group reviewed implementation and discussed potential amendments. No new commitments were added, and the scope of the action plan remains unchanged. The final two years of implementation (2026-2027) will focus on advancing commitments that have lagged, while sustaining momentum in high-performing areas. The commitment on improving democratic encounters is reported to be back on schedule. In contrast, the commitment on preventing mis- and disinformation will require buy-in from key departments such as the Public Sector ICT Department, while the commitment on good practices for open government needs targeted support from the government.

## About the Report

The **Open Government Partnership (OGP)** is a multi-stakeholder initiative focused on improving government transparency, ensuring opportunities for citizen participation in public matters, and strengthening mechanisms for public accountability. OGP brings together government and civil society champions of reform who believe governments are more effective and credible when they open their doors to public input and oversight.

The **Independent Reporting Mechanism (IRM)** is OGP's accountability arm and the main means of tracking progress in participating countries. Since 2011, the IRM has provided independent, evidence-based, and objective reporting to hold OGP members accountable and support their open government efforts. This is done through reports and timely recommendations during key moments in the action plan cycle.

The IRM provides a **Midterm Review** to countries undertaking four-year action plans, who are expected to undertake a refresh process at the two-year mark. The refresh process is an opportunity for countries to take stock of implementation progress thus far and update the action plan as needed. The Midterm Review analyzes significantly amended or new commitments (Section I), provides a general update on implementation progress (Section II), and evaluates the refresh process (Section III).

## Section I. Action Plan Refresh

**Finland began implementing its 2023-2027 action plan in December 2023. At the midpoint, the country reviewed progress over the first two years and assessed the evolving context for open government initiatives.<sup>1</sup> The Ministry of Finance did not introduce new commitments or amend the existing commitments. Instead, reformers decided to prioritize implementation of pending commitments. This IRM report assesses the refresh process, progress to date, and alignment with the minimum requirements under the Participation & Co-Creation Standards.<sup>2</sup>**

The Ministry of Finance and the Fifth Open Government Working Group (Finland's multi-stakeholder forum for OGP) led the midterm refresh process, in collaboration with other ministries and civil society organizations (CSOs).<sup>3</sup> The refresh process included three Working Group meetings, two discussions in the Advisory Board on Civil Society Policy (KANE),<sup>4</sup> and preparatory sessions involving a smaller secretariat for KANE.<sup>5</sup> The Ministry of Finance prepared a background mapping of resources and an open government survey covering national, regional, and local government entities to inform the refresh. The Ministry of Finance did not organize a public consultation due to resource constraints.<sup>6</sup> According to the midterm evaluation, the changes to the operational context during the first two years of the action plan (2023-2025) included democratic backsliding in Europe and globally, increased geopolitical tensions, economic slowdown in Finland, and rising polarization in Finland.<sup>7</sup> Many of the activities in the plan (e.g., National Dialogues, democratic encounters) touch on the themes construed by these tensions, such as trust in democracy, insecurity, and bringing government closer to the people in a context of uncertainty.

Rather than introducing new commitments or amending the existing commitments, reformers decided to focus on advancing commitments where progress had been slow, particularly democratic encounters (Commitment 1.2), preventing mis- and disinformation (Commitment 2.1), and good practices in open government (Commitment 3.1). Two considerations guided this approach: Firstly, there was limited stakeholder demand for new policy ideas, and existing priorities, including democratic encounters and youth participation, were assessed to require deeper implementation.<sup>8</sup> Secondly, limited administrative capacity constrained the Ministry of Finance's ability to conduct broader public consultations, resulting in a light-touch refresh. While these considerations are justifiable, the IRM considers the lack of amendments to be a missed opportunity to define more specific targets and outcomes to be reached in the final two years of implementation.

Implementation of the more advanced commitments, such as the National Dialogues (1.1), submitted as an Open Government Challenge, and the Civil Society Academies (2.2) also remain a priority for reformers. With resources returning to normal levels, conditions for implementation have improved, and the Ministry of Finance plans to prioritize the completion of the pending commitments. However, further effort is needed to advance commitments which depend on proactive engagement and coordination across government departments, such as preventing mis- and disinformation (Commitment 2.1).<sup>9</sup>

<sup>1</sup> Open Government Finland, Mid-term review – Fifth open government action plan 2023-2027, 2025, [https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti\\_2025-4.pdf](https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti_2025-4.pdf)

<sup>2</sup> Open Government Partnership, OGP National Handbook 2024, <https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2024/>;

Open Government Partnership, OGP Participation and Co-Creation Standards, 2021,

<https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>

<sup>3</sup> Katju Holkeri (Finland's Ministry of Finance), interview by the IRM, 28 January 2026.

<sup>4</sup> KANE's mandate advises the government on general civil society related issues.

<sup>5</sup> Katju Holkeri (Finland's Ministry of Finance), interview by the IRM, 28 January 2026.

<sup>6</sup> Ibid.

<sup>7</sup> Open Government Finland, Mid-term review – Fifth open government action plan 2023-2027, 2025,

[https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarviinnin-raportti\\_2025-4.pdf](https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarviinnin-raportti_2025-4.pdf)

<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

## Section II. Implementation Update<sup>1</sup>

**Finland's 2023–2027 action plan is advancing across most of the six commitments. The National Dialogues (Commitment 1.1), Civil Society Academies (Commitment 2.2), and Open Democracy Network (Commitment 3.2) are on schedule to be completed by the end of the implementation period (December 2027). Further efforts are needed to complete the commitments on democratic encounters (Commitment 1.2), preventing mis- and disinformation (Commitment 2.1), and good practices on open government (Commitment 3.1). Commitment 2.1 requires enhanced coordination across government departments.**

Commitment 1.1 aims to expand Finland's National Dialogues (established during the fourth action plan) and use their input in policy-making processes. According to the point of contact, dialogue organizers have held approximately 1,200 discussions between 2020 and 2025, engaging more than 11,000 participants from 170 different locations across Finland.<sup>2</sup> These figures demonstrate a steady increase in the number of participants and dialogues compared to the figures reported in the IRM 2019-2023 Results Report, which recorded nearly 2,000 participants through 229 dialogue events for the period 2022-2023.<sup>3</sup> The dialogues have involved a wide age range from 3 to 90, including members of marginalized communities reached through civil society partners.<sup>4</sup> There is evidence that the dialogues are helping to inform policy preparation and decision-making at the ministerial and subnational levels.<sup>5</sup> For example, a Helsinki hospital used the outcomes from a dialogue involving patients and nurses to adjust service practices.<sup>6</sup> Also, the Ministry of Education and Culture uses its dialogues in its policy processes and captures the outcomes in formal memos. The dialogues have also been reflected in foresight reports and core principles for public sector leadership.<sup>7</sup>

Resource constraints have slowed the progress on Commitment 1.2 (supporting democracy by improving citizens' encounters in public service provision). The midterm evaluation report mentions that the Day of the Elderly Citizens' Council was used to discuss the perspectives and experiences of older peoples' encounters with public service. The midterm evaluation report also mentions that up-to-date information on clear and plain language has been disseminated online through the ministries' intranet and the Open Democracy Network. However, the point of contact at the Ministry of Finance noted that this commitment will require sustained effort during the final two years of implementation. The encounters are being organized across a range of public sector contexts to ensure variety. According to the point of contact, public service encounters will take place in Espoo, as well as in smaller municipalities. In addition, there will be a pilot within a national government digital service initiative in Finland, and participation from a national government agency responsible for handling permits (the pilots are currently being decided upon and are not yet confirmed). The workshops and pilots will inform the development of practical support materials for improving citizens' interactions with civil servants engaged in public service provision.<sup>8</sup>

Commitment 2.1 faces the highest risk of not being completed by the end of the implementation period. Although the title of this commitment focuses on mis- and disinformation, its goals pertain to improving public access to government information and publication of open data. It contains four activity streams: 1) improving public access to open data in emergency situations, 2) opening public spending data in municipalities and wellbeing services regions, 3) collaborating with Organisation for Economic Co-operation and Development (OECD) countries in the fight against the spread of mis- and disinformation, and

4) workshops to help implement artificial intelligence (AI) ethics guidelines across the public administration. According to the midterm evaluation, the first stream is currently at the early planning stage, while the second stream is progressing well with a draft law that has undergone consultation in January 2026.<sup>9</sup> For the third stream, the point of contact noted that cooperation with OECD partners has begun.<sup>10</sup> The midterm evaluation mentions that an event on mis- and disinformation was organized for senior management in September 2024 and the topic has been part of the Public Leadership Day 2025 for high-level leaders of public administration. For the fourth stream, according to the midterm evaluation, the Ministry of Finance has published guidelines on the use of generative AI in public administration in spring 2025 and a guide on the use of AI in the central government in summer 2025. However, the report does not provide information on workshops or other efforts to sensitize the public administration on ethical use of AI. The point of contact reports that the completion of this commitment will depend on active engagement from additional departments, including the Public Sector ICT Department, which oversees opening public sector data practices.<sup>11</sup>

Launched during the fourth action plan, the Civil Society Academies (Commitment 2.2) have continued to support dialogue between public administration and civil society, nationally and regionally. Initially approached with some hesitation by government and civil society, they are now recognized as valuable platforms for collaboration. Their thematic sessions such as “fairness in society” have generated policy-relevant insights, beyond facilitating dialogue.<sup>12</sup> Yearly national CSO Academies have been held with over 200 in-person participants each time, along with hundreds of online registrations. Regional academies have also been organized in Oulu, Jyväskylä, and Vaasa, with plans to expand to other regions in 2026. The midterm evaluation highlights that the cooperation between the government and the eight CSO partners in these academies has been fruitful.<sup>13</sup>

There has been progress in collecting good practices in open government (Commitment 3.1), though government uptake remains limited and the Ministry of Finance’s website has yet to feature it.<sup>14</sup> While demand for good practices is high among public sector employees<sup>15</sup>, their understanding of how these practices are applied is uneven. The plan for the next two years is to foster more goal-oriented engagement with good practices, and to showcase high-impact areas of work, including the National Dialogues, youth participation, and democratic encounters, to support practical learning across public sector initiatives.<sup>16</sup>

The Open Democracy Network (Commitment 3.2) launched at the end of 2023. It is an informal network for sharing information and best practices on open government topics, including AI, open data, and civil service ethics. At the time of the refresh, the network has met 46 times with over 800 participants.<sup>17</sup> Materials and topics from the meetings are available on Finland’s open government website.<sup>18</sup> Overall, this commitment is on track to be completed by the end of the implementation period. However, making the network more effective remains a challenge. For example, the self-organizing of thematic groups was unsuccessful due to lack of demand and resources. Efforts have been made to create and link a 90-member network of civil servants to the broader Open Democracy Network, with materials curated and targeted at them.

The Fifth Open Government Working Group has met four times a year since 2023 to monitor implementation of the action plan. Publicly available information largely consists of meeting minutes on the Ministry of Finance’s website<sup>19</sup> and on the open government website.<sup>20</sup> Additionally, the 2025 midterm evaluation report provides a comprehensive overview of progress of the action plan.<sup>21</sup> The open government website also includes a progress tracker,

which shows the status of implementation for each commitment without further details.<sup>22</sup> To improve public oversight, the IRM recommends providing more information on the implementation of each commitment.

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<sup>1</sup> This section provides an overview of the implementation status of the action plan at the midpoint, December 2025. It is based on information available online or, if necessary, on evidence provided by key stakeholders. It includes commitments identified as promising in the Action Plan Review, submitted under the Open Gov Challenge, or where there is notable evidence of progress online. This is not an assessment of completion or early results, which the IRM will carry out in the Results Report at the end of the implementation period.

<sup>2</sup> Information provided to the IRM by the OGP point of contact at the Ministry of Finance during the pre-publication review of this report, 6 April 2026.

<sup>3</sup> Open Government Partnership, Independent Reporting Mechanism, Finland Results Report 2019-2023, 2024, [https://www.opengovpartnership.org/wp-content/uploads/2024/06/Finland\\_Results-Report\\_2019-2023\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/06/Finland_Results-Report_2019-2023_EN.pdf)

<sup>4</sup> Katju Holkeri (Finland's Ministry of Finance), interview by the IRM, 28 January 2026.

<sup>5</sup> Katju Holkeri (Finland's Ministry of Finance), interview by the IRM, 28 January 2026.

<sup>6</sup> Katju Holkeri (Finland's Ministry of Finance), interview by the IRM, 28 January 2026.

<sup>7</sup> National Dialogues, accessed 23 January 2026, <https://kansallisetdialogit.fi/>

<sup>8</sup> Ibid.

<sup>9</sup> Open Government Finland, Mid-term review – Fifth open government action plan 2023-2027, 2025, [https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti\\_2025-4.pdf](https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti_2025-4.pdf)

<sup>10</sup> Katju Holkeri (Finland's Ministry of Finance), interview by the IRM, 28 January 2026.

<sup>11</sup> Katju Holkeri (Finland's Ministry of Finance), interview by the IRM, 28 January 2026.

<sup>12</sup> Ibid.

<sup>13</sup> Open Government Finland, Mid-term review – Fifth open government action plan 2023-2027, 2025, [https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti\\_2025-4.pdf](https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti_2025-4.pdf)

<sup>14</sup> Open Government Finland, Good Practices, accessed 30 January 2026, <https://opengov.fi/good-practices/>

<sup>15</sup> Katju Holkeri (Finland's Ministry of Finance), interview by the IRM, 28 January 2026.

<sup>16</sup> Ibid.

<sup>17</sup> Open Government Finland, Mid-term review – Fifth open government action plan 2023-2027, 2025, [https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti\\_2025-4.pdf](https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti_2025-4.pdf)

<sup>18</sup> Open Government Finland, Open Democracy Network, accessed 30 January 2026, <https://avoinhallinto.fi/avoindemokratia-verkosto/>

<sup>19</sup> Finland's Ministry of Finance, Project VM139:00/2023, accessed 23 January 2026, <https://vm.fi/en/project?tunnus=VM139:00/2023>

<sup>20</sup> Open Government Finland, accessed 23 January 2026, <https://avoinhallinto.fi/>

<sup>21</sup> Open Government Finland, Mid-term review – Fifth open government action plan 2023-2027, 2025, [https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti\\_2025-4.pdf](https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti_2025-4.pdf)

<sup>22</sup> Open Government Finland, Implementation, accessed 23 January 2026, <https://opengov.fi/implementation/>

## Section III. Participation & Co-Creation

The IRM uses the OGP Participation and Co-Creation Standards to assess countries' participatory practices throughout the action plan cycle.<sup>1</sup> Countries are encouraged to aim for the full ambition of the standards and to meet the minimum requirements.<sup>2</sup> As Finland's action plan falls under a grace period, this assessment does not have implications for its status in the partnership.

**Table 1. Alignment with Minimum Requirements at the Midpoint**

Minimum requirement	Met?
<b>1.1 Space for dialogue:</b> The Fifth Working Group on Open Government is the main advisory body overseeing the OGP process in Finland. The Working Group has met over four times a year since December 2023, for a total of 10 times over the period of implementation up to the midpoint (December 2025). <sup>3</sup> The Working Group is co-led by civil society organizations (CSOs). The rules and mandate of the Working Group are published on the Ministry of Finance's open government website. <sup>4</sup> There was a change in composition in December 2024, with the inclusion of two Open Knowledge Finland representatives as "Personal Deputy Member" and "Member".	Yes
<b>2.1 OGP website:</b> The Ministry of Finance has a dedicated open government website which includes, among other resources, past and current OGP action plans, Finland's Open Government Strategy, the Open Democracy Network, supportive tools for open government, and links to information on the National Dialogues and CSO Academies. <sup>5</sup>	Yes
<b>2.2 Repository:</b> The Ministry of Finance's open government website contains a repository including information on the co-creation of the fifth action plan <sup>6</sup> and the Midterm Evaluation. <sup>7</sup> The Ministry of Finance updated the repository regularly over the first two years of the plan (2023-2025), including on different events, and monthly newsletters. <sup>8</sup> Some sections have not been updated recently, especially "best practices".	Yes
<b>3.1 Advanced notice:</b> The Ministry of Finance did not publish a timeline and overview of opportunities for stakeholders to participate in the refresh at least two weeks before the start of the refresh process. <sup>9</sup> According to the OGP point of contact, the reason there was not a longer refresh process was lack of capacity within the government. The point of contact was required to cover the Director General position in the Ministry of Finance when it became vacant, while still overseeing her open government responsibilities.	No
<b>4.1 Reasoned response:</b> The Ministry of Finance organized an "open government survey" in spring 2025 to provide an overview of the state and promotion of open government in Finland's public administration. The survey was open only to government representatives (national, regional, and local government entities) and was not open to civil society or non-governmental respondents. Although the scope of this survey went beyond the OGP process, the point of contact at the Ministry of Finance mentioned that the results were used to inform the refresh of the 2023-2027 action plan. The Ministry of Finance documented and published the responses to the survey. <sup>10</sup> The midterm evaluation of the action plan also contains a summary of the results of the survey. <sup>11</sup> The survey did not result in the addition of new commitments or amendments to the existing commitments in the action plan.	Yes
<b>5.1 Open implementation:</b> Ten meetings were held with civil society stakeholders through the Working Group during the first two years of implementation. <sup>12</sup> Other meetings were held with the CSO Advisory Board (KANE), and through the joint	Yes

implementation with civil society of specific programs such as the National Dialogues and CSO Academies. <sup>13</sup>	
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This brief was written by IRM researcher Lucía Cirimello in collaboration with IRM staff and reviewed by external reviewer Andy McDevitt.

<sup>1</sup> Open Government Partnership, OGP Participation and Co-Creation Standards, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>; Open Government Partnership National Handbook, 2024, <https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2024/>

<sup>2</sup> Open Government Partnership, Independent Reporting Mechanism, IRM Guidelines for the Assessment of Minimum Requirements, 2022, [https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements\\_20220531\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf)

<sup>3</sup> Finland's Ministry of Finance, Project VM139:00/2023, accessed 23 January 2026, <https://vm.fi/en/project?tunnus=VM139:00/2023>

<sup>4</sup> Ibid.

<sup>5</sup> Open Government Finland, Open Government Finland, accessed 23 January 2026, <https://opengov.fi/>

<sup>6</sup> Open Government Finland, Action Plans, accessed 26 January 2026, <https://avoinhallinto.fi/toimintaohjelmat/>

<sup>7</sup> Open Government Finland, Mid-term review – Fifth open government action plan 2023-2027, 2025, [https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti\\_2025-4.pdf](https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti_2025-4.pdf)

<sup>8</sup> Open Government Finland, Newsletters, accessed 26 January 2026, <https://avoinhallinto.fi/materiaalipankki/>

<sup>9</sup> Katju Holkeri (Finland's Ministry of Finance), interview by the IRM, 28 January 2026.

<sup>10</sup> Open Government Finland, 2025 Open Government Survey, 2025, <https://avoinhallinto.fi/wp-content/uploads/2025/09/Avo-in-hallinto-2025-Kyselytulosten-esittely.pdf>

<sup>11</sup> Open Government Finland, Mid-term review – Fifth open government action plan 2023-2027, 2025, [https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti\\_2025-4.pdf](https://avoinhallinto.fi/wp-content/uploads/2025/11/Puolivaliarvionnin-raportti_2025-4.pdf)

<sup>12</sup> Finland's Ministry of Finance, Project VM139:00/2023, accessed 23 January 2026, <https://vm.fi/en/project?tunnus=VM139:00/2023>

<sup>13</sup> Katju Holkeri (Finland's Ministry of Finance), interview by the IRM, 28 January 2026.