

Independent Reporting Mechanism

Results Report:
Sweden 2023–2025

Open
Government
Partnership



Independent
Reporting
Mechanism

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Executive Summary

Sweden’s fifth OGP action plan achieved positive and sustained early results in adopting and implementing the principles of the Open Data Charter as well as in developing the country’s second anti-corruption plan. There were notable improvements to the process for developing commitments, with government and civil society having different expectations about how engagement could be further strengthened.

Implementation

Sweden’s fifth OGP action plan comprised four commitments, three of which were fully completed and led to early results. Sweden adopted the Open Data Charter, and the Agency for Digital Government (Digg) made progress on implementing the Charter’s principles by providing new resources and capacity building on open data for government organizations (Commitments 1 and 2). The government’s second anti-corruption plan was another main outcome, which the Ministries of Finance and Justice produced in consultation with civil society (Commitment 4). More significant progress on opening public procurement data has continued beyond the implementation period into 2026 (Commitment 3).

Participation and Co-Creation

The Ministry of Finance ensured that Sweden met the minimum requirements for OGP’s Participation and Co-Creation Standards.

Improving upon previous cycles, the government ensured the availability of reasoned response during co-creation, the launch of an OGP webpage, and regular meetings with civil society throughout the implementation period.

There were differing expectations between government and civil society stakeholders on engagement during the development and implementation of commitments. While a Ministry of Finance representative stated that the Ministry valued the input received, some civil society organization (CSO) representatives indicated that it was unclear to what extent their comments were taken on board. Ultimately, this perception led some CSOs to reduce their engagement during the implementation period. This perception about influence on policy-making is also mirrored in other Swedish citizen consultation processes.¹

At a Glance

LEVEL OF COMPLETION

4/4 Complete or substantially complete commitments

EARLY RESULTS

3/4 Commitments with early results

1/4 Commitments with significant results

KEY OBSERVATIONS

- Government and civil society participants had different expectations on their level of influence in the development and implementation of commitments.
- OGP framework can be useful for strengthening cross-cutting links between transparency, procurement, and anti-corruption.

Met the minimum requirements during implementation: Yes

Implementation in Context

Sweden’s commitments in its OGP action plan represented a subset of the country’s wider open government efforts. The country participates in OGP with a high baseline of openness, low levels of corruption, and a strong culture of public participation. Sweden remained among the top 10 countries in relevant global rankings, such as the 2024 World Justice Project’s Rule of Law Index and the 2025 Transparency International Corruption Perceptions Index.²

Internationally, Sweden has provided funding for democracy, governance, and open government initiatives through the Ministry of Foreign Affairs, the Swedish International Development Cooperation Agency (Sida), and the Swedish Association of Local Authorities and Regions.

¹ About one-third of Swedes (29 percent) find it likely that government would use inputs from citizens’ consultation, lower than the OECD average (32 percent). See Organisation for Economic Co-operation and Development (OECD), OECD Survey on Drivers of Trust in Public Institutions 2024 Results - Country Notes Sweden: Perceptions of decision making on complex policy issues, 10 July 2024, https://www.oecd.org/en/publications/oecd-survey-on-drivers-of-trust-in-public-institutions-2024-results-country-notes_a8004759-en/sweden_11ca1946-en.html#section-d1e185.

² World Justice Project, Rule of Law Index 2024: Sweden, 2024, <https://worldjusticeproject.org/rule-of-law-index/country/2024/Sweden/Open%20Government>; Transparency International, Corruption Perceptions Index 2025: Sweden, 2025, <https://www.transparency.org/en/cpi/2025/index/swe>.

Section I. Key Observations

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

Observation 1: Government and civil society participants had different expectations on their level of influence in the development and implementation of commitments.

Sweden met the minimum requirements of the OGP Participation and Co-Creation Standards during the co-creation and implementation of the action plan. There were marked improvements compared to the previous action plan cycle. The Ministry of Finance organized regular meetings with civil society, produced a reasoned response during co-creation, and launched an OGP webpage. The national body for dialogue and consultation (NOD) between the government and civil society provided support in planning these consultation sessions. A representative from the Ministry of Finance noted that the discussions were productive, with strong engagement from civil society which the Ministry valued.

Yet, some civil society participants said they would have preferred direct engagement with officials from relevant ministries to discuss potential commitments during co-creation. Some expressed a lack of clarity regarding the extent to which their feedback during the meetings was considered in practice. In turn, this discouraged them from engaging further during implementation.

Differing expectations between government and civil society on their engagement framework remains an ongoing challenge for many OGP members. In Sweden, outside the OGP framework, CSOs are frequently invited to government consultations, inquiries, and expert groups, as well as to engage with ministries and high-level officials.¹ However, OGP’s recently updated action framework could enable Sweden to develop and adopt commitments that align with national timeframes, policy priorities, and consultative approaches.² This may help ensure that the development of commitments are effective and aligned with best practice in Sweden, therefore bridging the gap on expectations between government and civil society.

Observation 2: The OGP framework can be useful for strengthening cross-cutting links between transparency, procurement, and anti-corruption.

Implementing commitments through the OGP framework brought unforeseen benefits beyond completed commitments. For example, representatives from both civil society and government concurred that the OGP framework was useful for strengthening cross-cutting links across procurement, open data, and anti-corruption.³

The cross-cutting nature of open government topics is also noted in the Organisation for Economic Co-operation and Development’s (OECD) 2025 Integrity Report and Sweden’s anti-corruption action plan.⁴ Both documents highlight the benefits of digitalizing public procurement in Sweden and ensuring interoperability between databases to increase efficiency and identify relevant integrity breaches throughout the procurement cycle. For example, open data could help detect irregularities and facilitate timely access to procurement data for oversight bodies.

Subsequently, the OGP framework could also build other cross-cutting links among domestic reformers working on open government topics. As Sweden implements its digitalization and

artificial intelligence (AI) strategies,⁵ the OGP platform can facilitate opportunities to exchange experiences with other members working on these issues, including Australia, Finland, and Spain. For example, OGP’s Open Algorithms Network convenes government practitioners, civil society, and experts working on algorithmic transparency and accountability, with a focus on practical implementation support.⁶

¹ Organisation for Economic Co-operation and Development (OECD), OECD Integrity Review of Sweden, 30 September 2025, https://www.oecd.org/en/publications/oecd-integrity-review-of-sweden_648d3988-en/full-report/strengthening-transparency-and-integrity-in-public-decision-making-processes-in-sweden_3d6c833c.html.

² Open Government Partnership (OGP), Updated OGP Action Framework (2026), 23 February 2026, <https://www.opengovpartnership.org/news/updated-ogp-action-framework-2026>.

³ Emelie Roos Ekengren (Ministry of Finance), interview by the IRM, 28 August 2025; Mattias Axell (Open Knowledge Sweden), interview by the IRM, 28 August 2025; Ulrika Domellöf Mattsson (Agency for Digital Government — Digg), interview by the IRM, 23 September 2025.

⁴ OECD, OECD Integrity Review of Sweden.

⁵ Ministry of Finance, Sveriges digitaliseringsstrategi 2025–2030 [Sweden’s digitalization strategy 2025-2030], 28 May 2025, <https://www.regeringen.se/rapporter/2025/05/sveriges-digitaliseringsstrategi-20252030/>; Ministry of Finance, Sweden’s AI Strategy, 25 February 2026, <https://www.government.se/information-material/2026/02/swedens-ai-strategy>.

⁶ Open Government Partnership, Open Algorithms Network, accessed 15 March 2026, <https://www.opengovpartnership.org/about/partnerships-and-coalitions/open-algorithms-network>.

Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objectives, the country context, the policy area, and the evidence of changes within the reporting period that ended in June 2025. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

Table 1. Commitments with Early Results

Commitments 1 and 2: Sweden adopted the Open Data Charter, and the Agency for Digital Government led steps to implement its principles, with new resources and capacity building for government organizations.

Commitment 4: The Ministries of Finance and Justice published a new government action plan against corruption and undue influence—Sweden's most comprehensive to date.

Commitments 1 and 2: Adopting and implementing Open Data Charter principles

Implementers: Ministry of Finance and Agency for Digital Government (Digg)

Context and Objectives

After the previous OGP action plan established an updated Swedish data portal,¹ Commitments 1 and 2 in the fifth action plan set out to adopt and implement the Open Data Charter, which outlines how to deliver government policies that make data accessible and freely available. Previously, the Agency for Digital Development (Digg) had already been overseeing open data within Sweden's public administration.

Early Results: Moderate

This commitment made positive changes to Sweden's open data practices, with potential for more significant results and impact beyond this action plan cycle.

Sweden adopted the Open Data Charter in March 2023,² making it one of only 28 national governments that have adopted this charter since 2015 by pledging to deliver policies that make data accessible and freely available while protecting the rights of people and communities.³

After adopting the charter, the Swedish government tasked Digg to lead its implementation.⁴ Digg took several steps to implement the Open Data Charter principles, with new resources and capacity building for government organizations. It launched 'Datafyren' (Data Lighthouse) in February 2025, a page on Sweden's data portal that offers education materials and a self-assessment tool for organizations to understand where they stand on data maturity.⁵ It then began offering a shared metadata catalogue and a Metadata Quality Assessment.

Digg has represented Sweden at Open Data Charter meetings to exchange experiences with counterparts from other countries.⁶ In 2024, it conducted a detailed assessment of the country's Open Data Charter activities.⁷ It also continued to implement the Data Ambassador Program, launched in February 2023, to support capacity building within government organizations.⁸ By

2025, the program had trained 331 individuals—mostly from municipalities—with some participation from central government authorities.⁹ According to a Digg representative, implementation of the commitment benefited from alignment with Sweden’s 2021 data strategy and European Union (EU) obligations, in addition to its OGP mandate.¹⁰

Government representatives stated that this commitment strengthened transparency and raised the profile of open data initiatives in Sweden. A Ministry of Finance representative noted that implementation of the Open Data Charter connected domestic open data efforts to a wider network of international counterparts.¹¹ A Digg representative added that it saw Datafyren and the Data Ambassador Program as avenues to provide practical tools and improve publication rates, with 20 new publishers—largely at municipal level—contributing datasets to the Swedish data portal.¹² During the implementation period, the portal saw an increase of 3,652 new datasets, rising from 17,192 in December 2023 to 20,844 in June 2025.¹³

In practice, the data are being used across the country. The national data portal’s discussion forum that was live from 2021 until December 2025¹⁴ had 787 users and facilitated engagement with published data.¹⁵ Between October 2024 and April 2025, municipalities in Skaraborg used a standardized format to publish open data on vacant plots of land to address community needs.¹⁶ This allowed Business Region Skaraborg to launch a common map to support companies expanding housing in Skaraborg in May 2025, proving that standardized data enabled a better overview of vacant plots and identified needs for mapping further data.¹⁷

Notwithstanding, a Digg representative noted time, resource, and awareness constraints, in addition to cautiousness over incorrect data release and potential exposure to negative media scrutiny.¹⁸ An Open Knowledge Sweden (OKS) representative also noted that outside the specifics of the commitment, some amendments to Sweden’s open data legislation in 2022, including removal of requirements to maintain certain registers, hindered more significant progress on open data.¹⁹ According to the European Data Portal’s Open Data Maturity Reports covering the action plan implementation period, Sweden’s scores on open data policy and impact have both declined despite an improvement in the quality of open data.²⁰

Overall, efforts to institutionalize open data practices were ongoing after the end of the implementation period. With the Open Data Charter assessment integrated into the Swedish data portal, steps were taken to link it with the new 2025–2035 digitalization strategy.²¹ With a horizontal objective of national data infrastructure enabling sharing and use of data, the strategy has planned measures to continue developing the data portal, creating a plan for publication of public data, and releasing high-value datasets.²²

Looking Ahead

Moving forward, Sweden’s digitalization and AI strategies are expected to frame future developments on open data. A Digg representative said the institution is considering next steps to incorporate the Open Data Charter as an indicator for the strategies, and to continue releasing high-value EU datasets, which are already driving progress.²³ However, developments may be impacted by the planned merger of Digg with the Post and Telecom Authority.²⁴ Pending legislation on interoperability, future efforts could finalize²⁵ while clear mandates, leadership, and appropriate resourcing across public bodies could further aid the Charter’s embedding.

Commitment 4: Develop work against corruption

Implementer: Ministry of Finance

Context and Objectives

Sweden has a high baseline of openness, low levels of corruption, and an established culture of public participation. It consistently sits among the top 10 countries in global rankings on open government and corruption according to the World Justice Project's Rule of Law Index, as well as Transparency International's (TI) Corruption Perceptions Index.²⁶ Sweden's 2021–2023 first action plan against corruption initiated positive first steps.

Under this commitment, the Ministry of Finance set out to elaborate its anti-corruption work. In design, its text did not specify the ministry's planned activities as the government had not officially communicated the decision to develop a new action plan against corruption and undue influence.²⁷ As such, the early results from this commitment's implementation exceeded the IRM's assessment of potential in the Action Plan Review.

Early Results: Significant

In July 2024, the Ministries of Finance and Justice published Sweden's 2024–2027 action plan against corruption and undue influence. The plan covers measures related to criminal law, conflicts of interest, undue influence, public procurement, with provisions on administrative culture, efforts at the municipal and regional levels, and cross-government cooperation. Its measures comprise regulatory changes, ministerial responsibilities, and enhanced monitoring.²⁸

Previously, in March 2024, the government officially communicated the decision to develop a new action plan against corruption and undue influence,²⁹ followed by roundtables with experts from civil society and other sectors.³⁰ According to TI Sweden and the OECD, this process was more participatory than the previous plan's development.³¹ A Ministry of Finance representative noted the OGP platform's important role in shaping the plan.³²

Representatives of the Ministry of Finance and TI Sweden, as well as the European Commission's 2024 Rule of Law report, highlighted the new plan's broader scope.³³ To address key gaps in the first plan, it incorporates recommendations from the Agency for Public Management³⁴ and seven out of nine points proposed by TI Sweden.³⁵ The OECD remarked this as Sweden's most comprehensive anti-corruption strategy to date, sitting above the average quality of OECD counterparts' strategies.³⁶ Nevertheless, the OECD and TI Sweden noted that further work is needed to close the gaps on conflict of interest and corruption in the private sector.³⁷

By 2025, the plan's implementation had begun with positive progress. It initiated efforts on the legislative framework for criminal measures against corruption. The plan took steps toward increasing political finance transparency with a report to the government in May 2025.³⁸ In July 2025, a final legislative inquiry to expand criminal liability for official misconduct was also presented.³⁹ A follow-up proposal on lobbying register and tighter rules on foreign financing for political parties has also been proposed to enter into force by July 2027.⁴⁰ Separately, the Agency for Public Management is carrying out an assignment on strengthening good governance among public agencies, particularly related to undue influence.⁴¹ It seeks to develop support materials to prevent and manage undue influence, and ensure that this is targeted at high-risk municipalities and regions where support is most needed. By the end of the action plan cycle, early indications showed significant early results in improving anti-corruption policy and practice in Sweden.

Looking Ahead

The government has focused its attention on public sector corruption risks and the undue influence of organized crimes.⁴² While the achievements to date are welcomed, a TI Sweden representative emphasized the need for future anti-corruption efforts related to conflicts of interest, revolving doors, and public procurement transparency,⁴³ which align with the anti-corruption strategy. More specifically, an interviewed OKS representative highlighted the need for interoperable open data to help prevent companies involved in corruption from winning procurement processes.⁴⁴ OECD recommendations could also inform future development and implementation of anti-corruption plans and strategies.⁴⁵

As of March 2026, the government had begun next steps, tasking the Swedish Agency for Public Management with developing strategic work to counter corruption and undue influence. The agency also began developing proposals to strengthen transparency and anti-corruption efforts through a national procurement database and a data analytics function for procurement and purchasing data.⁴⁶

¹ Agency for Digital Government (Digg), Sveriges dataportal [Sweden data portal], accessed June 2025, www.dataportal.se.

² Open Data Charter, Adoption Letter - Sweden, June 2023, https://drive.google.com/file/d/1bbKNHSLV9_wlrNN8794SCg8p3qJO_vMQ/view.

³ Open Data Charter, Government adopters, accessed 24 October 2025, <https://opendatacharter.org/government-adopters>.

⁴ Government of Sweden, Sveriges handlingsplan för Open Government Partnership 2023–2025 [Sweden's action plan for Open Government Partnership 2023–2025], May 2023, <https://www.regeringen.se/rapporter/2023/05/sveriges-handlingsplan-for-open-government-partnership-20232025>.

⁵ Digg, Datafyren, accessed 27 June 2025, <https://www.dataportal.se/datafyren>.

⁶ Digg, Uppdrag att ansvara för genomförandet av Open Data Charters stadga Slutrapport i regeringsuppdraget Fi2023/01226 [Assignment to be responsible for the implementation of Open Data Charter Final report on government assignment Fi2023/01226], 10 April 2025, <https://www.digg.se/analys-och-uppfoljning/publikationer/publikationer/2025-04-24-uppdrag-att-ansvara-for-genomforandet-av-open-data-charters-stadga>.

⁷ Digg, Uppföljning Open Data Charter 2024 [Follow Up Open Data Charter 2024], accessed 27 June 2025, <https://www.dataportal.se/uppfoljning-open-data-charter>.

⁸ Digg, Digg lanserar dataambassadörsprogram för att stödja arbetet med öppna data [Digg launches data ambassador program to support open data efforts], 21 February 2023, <https://www.digg.se/om-oss/nyheter/oppna-och-delade-data/nyheter/2023-02-21-digg-lanserar-dataambassadorsprogram-for-att-stodja-arbetet-med-oppna-data>.

⁹ Ulrika Domellöf Mattsson (Digg), interview by the IRM, 23 September 2025.

¹⁰ Mattsson, interview.

¹¹ Emelie Roos Ekengren (Ministry of Finance), interview by the IRM, 28 August 2025.

¹² Mattsson, interview.

¹³ Digg, Statistics, accessed 27 June 2025, <https://www.dataportal.se/en/statistics>.

¹⁴ Digg, Communityt på Sveriges dataportal stängs ner – tack för ert engagemang! [The community on Sweden's data portal is being closed - thank you for your commitment!], 28 November 2025, <https://www.dataportal.se/nyheter/communityt-pa-sveriges-dataportal-stangs-ner>.

¹⁵ Digg, Community på Sveriges dataportal [Community on Swedish data portal], accessed 2 December 2025, <https://community.dataportal.se/users?page=1>.

¹⁶ Digg, Lediga Tomter [Vacant Lots], accessed 2 December 2025, https://www.dataportal.se/en/datasets?p=1&q=lediga%20tomter&s=2&t=20&f=&rt=dataset%24data_service%24dataset_series.

¹⁷ Digg, Samverkan kring lediga tomter som öppna data möjliggör tjänst för etablering i regionen [Collaboration around vacant plots of land as open data enables service for establishment in the region], 28 August 2025, <https://www.dataportal.se/exempel-datadriven-transformation/samverkan-kring-lediga-tomter-som-oppna-data-mojliggor-tjanst-for-etablering-i-regionen>

¹⁸ Mattsson, interview by the IRM, 23 September 2025.

¹⁹ Mattias Axell (Open Knowledge Sweden), interview by the IRM, 28 August 2025.

²⁰ European Data Portal, Open Data Maturity — Sweden: Country maturity scores over time, 2025, https://data.europa.eu/en/open-data-maturity/2025#country-profiles/country_SE/maturity_and_dimensions.

²¹ Mattsson, interview.

²² Ministry of Finance, Sveriges digitaliseringsstrategi 2025-2030 [Sweden's digitalization strategy 2025–2030], 28 May 2025, <https://www.regeringen.se/rappporter/2025/05/sveriges-digitaliseringsstrategi-20252030>.

²³ Mattsson, interview.

²⁴ Swedish Post and Telecom Authority, Regeringens besked: PTS och Digg går samman [Government announcement: PTS and Digg merge], 22 September 2025, <https://pts.se/nyheter-och-pessmeddelanden/regeringens-besked-pts-och-digg-gar-samman>.

²⁵ Ministry of Finance, En reform för datadelning, [A reform for data sharing], 18 December 2023, <https://www.regeringen.se/rattsliga-dokument/statens-offentliga-utredningar/2023/12/sou-202396>.

²⁶ World Justice Project, Rule of Law Index: Sweden, 2024, <https://worldjusticeproject.org/rule-of-law-index/country/2024/Sweden/Open%20Government>; Transparency International, Corruption Perceptions Index, 2025, <https://www.transparency.org/en/cpi/2025/index/swe>.

²⁷ Open Government Partnership, IRM Action Plan Review: Sweden 2023–2025, 1 December 2023, <https://www.opengovpartnership.org/documents/sweden-action-plan-review-2023-2025>.

²⁸ Ministry of Finance & Ministry of Justice, Ny handlingsplan mot korruption och otillåten påverkan [New action plan against corruption and undue influence], 5 July 2024, <https://www.regeringen.se/pessmeddelanden/2024/07/ny-handlingsplan-mot-korruption-och-otillaten-paverkan>.

²⁹ Ministry of Finance, Regeringen stärker förutsättningarna för det korruptionsförebyggande arbetet i staten [The government is strengthening the conditions for corruption prevention work in the state], 27 March 2024, <https://www.regeringen.se/pessmeddelanden/2024/03/regeringen-starker-forutsattningarna-for-det-korruptionsforebyggande-arbetet-i-staten>.

³⁰ Ministry of Finance, Skriftlig dokumentation av samråd 6 november 2024 [Written documentation of consultation on 6 November 2024], 5 December 2024, <https://www.regeringen.se/rappporter/2023/05/sveriges-handlingsplan-for-open-government-partnership-20232025>.

³¹ Lotta Rydstrom (Transparency International Sweden), correspondence with the IRM, 4 October 2025; OECD, OECD Integrity Review of Sweden, 30 September 2025, https://www.oecd.org/en/publications/oecd-integrity-review-of-sweden_648d3988-en/full-report/enhancing-sweden-s-strategic-approach-to-integrity_516f19c3.html.

³² Ekengren, interview.

³³ Ekengren, interview; Rydstrom, correspondence; European Commission, 2024 Rule of Law Report Country Chapter on the rule of law situation in Sweden, 24 July 2024, https://commission.europa.eu/publications/2024-rule-law-report-communication-and-country-chapters_en.

³⁴ European Commission, 2024 Rule of Law Report Country Chapter on the rule of law situation in Sweden.

³⁵ Dagens Samhälle, Regeringens handlingsplan mot korruption saknar handling [The government's action plan against corruption lacks action], 11 February 2021, <https://www.dagensamhalle.se/opinion/debatt/regeringens-handlingsplan-mot-korruption-saknar-handling>.

³⁶ OECD, OECD Integrity Review of Sweden.

³⁷ Rydstrom, correspondence; OECD, OECD Integrity Review of Sweden.

³⁸ Ministry of Justice, Ökad insyn i politiska processer [Increased transparency in political processes], 8 May 2025, <https://www.regeringen.se/rattsliga-dokument/statens-offentliga-utredningar/2025/05/sou-202552>.

³⁹ Ministry of Justice, Straffrättsliga åtgärder mot korruption och tjänstefel [Criminal measures against corruption and misconduct], 25 July 2025, <https://www.regeringen.se/rattsliga-dokument/statens-offentliga-utredningar/2025/07/sou-202587>.

⁴⁰ Ministry of Justice, Ökad insyn i politiska processer [Increased transparency in political processes], 4 March 2026, <https://www.regeringen.se/rattsliga-dokument/lagratsremiss/2026/03/okad-insyn-i-politiska-processer>; Klagget, Lobbyregister kan komma 7:e april [Lobbying register may arrive on 7 April], 14 January 2026, <https://klagget.nu/2026/01/14/lobbyregister-kan-komma-7e-april/#fd8c1d6d-c516-4239-8b13-e454c9f69121>.

⁴¹ Agency for Public Management, Stödja arbetet mot otillåten påverkan i den offentliga förvaltningen [Support the work against undue influence in public administration], accessed 24 October 2025, <https://www.statskontoret.se/uppdrag-och-rappporter/pagaende-uppdrag/stodja-arbetet-mot-otillaten-paverkan-i-den-offentliga-forvaltningen>; Agency for Public Management, Ta fram utbildning om otillåten påverkan i den offentliga förvaltningen [Develop training on undue influence in public administration], accessed 24 October 2025, <https://www.statskontoret.se/pagaende-uppdrag/ta-fram-utbildning-om-otillaten-paverkan-i-den-offentliga-forvaltningen>.

⁴² OECD, OECD Integrity Review of Sweden.

⁴³ Rydstrom, correspondence.

⁴⁴ Axell, interview.

⁴⁵ OECD, OECD Integrity Review of Sweden.

⁴⁶ Ministry of Finance, Stärkt arbete mot korruption och förslag för nationell upphandlingsdatabas [Strengthened work against corruption and proposals for a national procurement database], 9 March 2026,

<https://www.regeringen.se/pressmeddelanden/2026/03/starkt-arbete-mot-korruption-och-forslag-for-nationell-upphandlingsdatabas/>; Ministry of Finance, Uppdrag till Statskontoret om en nationell upphandlingsdatabas och en analysfunktion för inköps- och upphandlingsdata [Assignment to the State Treasury regarding a national procurement database and an analysis function for purchasing and procurement data], 10 March 2026, <https://www.regeringen.se/regeringsuppdrag/2026/03/uppdrag-till-statskontoret-om-en-nationell-upphandlingsdatabas-och-en-analysfunktion-for-inkops--och-upphandlingsdata/>.

Section III. Participation and Co-Creation

The Ministry of Finance ensured that Sweden met the minimum requirements for OGP’s Participation and Co-Creation Standards during the fifth action plan cycle. Participants from government and civil society hold differing expectations on their level of engagement and influence within the OGP framework.

OGP in Sweden

In this action plan cycle, oversight of Sweden’s participation in OGP shifted from the Ministry of Infrastructure to the Ministry of Finance, owing to its role in digitalization and the number of action plan commitments focused on open data. The Agency for Digital Government (Digg) was responsible for implementing three of the four commitments.

CSOs were engaged through consultation meetings held every six months. The national body for dialogue and consultation (NOD) between the government and civil society provided support in planning these consultation sessions. Four organizations regularly attended the consultation sessions: the Association for Digital Freedoms and Rights, Open Knowledge Sweden (OKS), Transparency International (TI) Sweden, and Wikimedia Foundation Sweden. An additional 14 CSOs were invited and participated in different sessions.¹

The Ministry of Finance launched a publicly accessible national OGP webpage.² It contains the latest action plan along with the latest IRM report and information on consultations and commitment implementation.

Action Plan Co-Creation

The co-creation process included two meetings with civil society. The Ministry of Finance tasked the NOD to organize the first meeting in October 2022, where CSOs with expertise in digitalization for public sector openness discussed potential topics for the action plan. The meeting also included representatives of the Ministry of Finance and Digg, as well as the Association for Digital Freedoms and Rights, Civic Tech Sweden, Foundation for Public Code, IOGT-NTO, Open Knowledge Sweden, Sveriges Föreningar, and Wikimedia Foundation Sweden.³ The Ministry of Finance organized a follow-up meeting in February 2023 where it presented the draft action plan, attended by the same individuals that participated in the October 2022 meeting. The ministry answered questions around the draft commitments, but explained that the action plan would be implemented as outlined and that the details would be clarified during implementation.⁴ Some of the CSO proposals were not included due to ongoing political processes and a lack of capacity to engage institutions at that time.⁵

Participation during Implementation

The Ministry of Finance convened four virtual and in-person meetings with Digg and CSOs with support from the NOD. Between four and eleven CSOs attended each of these meetings—held in December 2023, May 2024, November 2024, and May 2025.⁶ A Ministry of Finance representative noted a contrast between in-person meetings, which enabled richer discussions, and virtual meetings, which had higher attendance.⁷

Implementation results were presented at these meetings, and there were opportunities for civil society attendees to comment on implementation.⁸ According to the Ministry of Finance, the discussions were valuable for surfacing civil society views, for instance providing input into the assignment on procurement data given to the Swedish Agency for Public and Financial

Management after the implementation period.⁹ However, some civil society participants said they would have preferred direct communication with ministries,¹⁰ deciding to reduce engagement as they felt that their feedback was not taken up.¹¹

Table 2. Compliance with Minimum Requirements

The IRM uses the OGP Participation and Co-Creations Standards to assess participatory practices throughout the action plan cycle.¹² Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.¹³

Minimum requirement	Co-creation	Implementation
1.1 Space for dialogue: The Ministry of Finance convened consultation meetings with Digg and CSOs every six months with support from the NOD. Four meetings were held in December 2023, May 2024, November 2024, and May 2025. Between four and eleven CSOs attended the meetings. The invitation to participate in the May 2025 meeting included basic information on the purpose of the consultation and the form it would take, published on Sweden’s OGP webpage. ¹⁴	Yes	Yes
2.1 OGP website: The government maintains a publicly accessible webpage for Sweden’s OGP process. ¹⁵ It contains the latest action plan along with the latest IRM report and information on consultations and commitment implementation.	Yes	Yes
2.2 Repository: The webpage for Sweden’s OGP process serves as a repository. ¹⁶ It was updated more than twice a year with information on co-creation and implementation throughout the action plan cycle.	Yes	Yes
3.1 Advanced notice: See the Action Plan Review. ¹⁷	Yes	Not applicable
3.2 Outreach: See the Action Plan Review. ¹⁸	Yes	Not applicable
3.3 Feedback mechanism: See the Action Plan Review. ¹⁹	Yes	Not applicable
4.1 Reasoned response: See the Action Plan Review. ²⁰	Yes	Not applicable
5.1 Open implementation: Civil society stakeholders had opportunities to comment on implementation progress during the four meetings organized by the Ministry of Finance, ²¹ who then published documentation of the meeting online. ²²	Not applicable	Yes

¹ Emelie Roos Ekengren (Ministry of Finance), interview by the IRM, 28 August 2025.

² Government of Sweden, Sveriges handlingsplan för Open Government Partnership 2023–2025 [Sweden’s action plan for Open Government Partnership 2023–2025], May 2023, <https://www.regeringen.se/rappporter/2023/05/sveriges-handlingsplan-for-open-government-partnership-20232025>.

³ Mattias Axell (Open Knowledge Sweden), correspondence with the IRM, 24 June 2023.

⁴ Open Government Partnership, IRM Action Plan Review: Sweden 2023–2025, 1 December 2023, <https://www.opengovpartnership.org/documents/sweden-action-plan-review-2023-2025>.

⁵ Open Government Partnership, IRM Action Plan Review: Sweden 2023–2025.

⁶ Government of Sweden, Sweden’s action plan for Open Government Partnership 2023–2025.

⁷ Ekengren, interview.

⁸ Eric Luth (Wikimedia Foundation Sweden), correspondence with the IRM, 15 September 2025.

⁹ Emelie Roos Ekengren (Ministry of Finance), pre-publication comments, 25 May 2026.

¹⁰ Axell, interview; Lotta Rydstrom (Transparency International Sweden), correspondence with the IRM, 4 October 2025.

¹¹ Axell, interview; Luth, correspondence; Rydstrom, correspondence.

¹² Open Government Partnership, OGP Participation and Co-Creation Standards, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards>.

¹³ Open Government Partnership, 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.

¹⁴ Government of Sweden, Sweden’s action plan for Open Government Partnership 2023–2025.

¹⁵ Government of Sweden, Sweden’s action plan for Open Government Partnership 2023–2025.

¹⁶ Government of Sweden, Sweden’s action plan for Open Government Partnership 2023–2025.

¹⁷ Open Government Partnership, IRM Action Plan Review: Sweden 2023–2025.

¹⁸ Open Government Partnership, IRM Action Plan Review: Sweden 2023–2025.

¹⁹ Open Government Partnership, IRM Action Plan Review: Sweden 2023–2025.

²⁰ Open Government Partnership, IRM Action Plan Review: Sweden 2023–2025.

²¹ Luth, correspondence.

²² Government of Sweden, Sweden’s action plan for Open Government Partnership 2023–2025.

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. It provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.¹

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.² 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 early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objectives, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time.

The Action Plan Review for Sweden's 2023–2025 Action Plan clustered Commitments 1, 2, and 3 which relate to open data. However, following implementation, the IRM decided to assess Commitments 1 and 2 together as a cluster, while Commitment 3 is assessed separately.

The early results indicator establishes three levels of results:

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

- enhancing the enabling environment to build trust between citizens and the state.
- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes toward:
 - 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 toward:
 - 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 Soren Kirk Jensen and was reviewed by Jeff Lovitt, IRM external expert. The IRM methodology, products quality, and review process are overseen by the IRM’s International Experts Panel (IEP).³ For more information, refer to the IRM webpage⁴ or the glossary of IRM and OGP terms.

¹ For definitions of Open Government Partnership (OGP) terms, such as co-creation and promising commitments, see Open Government Partnership, OGP Glossary, <https://www.opengovpartnership.org/glossary>.

² 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 in the Action Plan Review.

³ Open Government Partnership, International Experts Panel, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>.

⁴ Open Government Partnership, IRM Overview, <https://www.opengovpartnership.org/irm-guidance-overview>.

Annex I. Commitment Data¹

Commitment 1: Adoption of the Open Data Charter	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate ● This commitment has been clustered with Commitment 2.
This commitment is assessed in Section II.	
Commitment 2: Special point of contact and implementation of open data principles	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate ● This commitment has been clustered with Commitment 1.
This commitment is assessed in Section II.	
Commitment 3: Purchase data	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: No Notable Results
<p>The Agency for Digital Government (Digg) was responsible for the implementation of the Open Data Charter in Sweden, promoting open access to purchasing data, and reporting on progress by the end of the implementation period. In autumn 2024, Digg produced a reference impact assessment on information security classification of accounts payable for smaller municipalities, in collaboration with the national data workshop, the Swedish Municipalities and Regions, the Västra Götaland Region and the Municipality of Södertälje.² Digg also published its analysis of the current situation in Sweden following interviews and surveys with relevant stakeholders, as well as further actions that could be taken to promote access to open procurement data. The Ministry of Finance considers this commitment to have been completed. Evidence of any early results from implementation has come in the months following the end of the action plan, outside the IRM’s window of assessment, outlined in the paragraph below.</p> <p>Changes in policy and practice advancing in procurement transparency occurred after the end of the implementation period. In October 2025, the government tasked Digg with transferring some of its functions in line with its own recommendations on advancing procurement data.³ By late 2025, other institutional positions on a national procurement database had shifted, and in March 2026, the government tasked the Swedish Agency for Public and Financial Management with submitting proposals on how a national procurement database and an analysis function for purchasing and procurement data can be established. The Agency would also calculate the costs of the proposal and report on the socio-economic effects and</p>	

consequences.⁴ Momentum has continued to build in progressing procurement transparency in Sweden in 2026.

In terms of potential future open government reform, Digg and Transparency International Sweden consider the absence of a single national procurement database to be a major gap compared to other European countries.⁵

Commitment 4: Develop work against corruption

- | | |
|--|---|
| <ul style="list-style-type: none">● Verifiable: Yes● Does it have an open government lens? No● Potential for results: Unclear | <ul style="list-style-type: none">● Completion: Complete● Early results: Significant |
|--|---|

This commitment is assessed in Section II.

¹ Editorial notes:

1. For commitments that are clustered, the assessment of potential for 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, see: Government of Sweden, Sveriges handlingsplan för Open Government Partnership 2023–2025 [Sweden's action plan for Open Government Partnership 2023–2025], May 2023, <https://www.regeringen.se/rappporter/2023/05/sveriges-handlingsplan-for-open-government-partnership-20232025>.
3. For more information on the assessment of the commitments' design, see: Open Government Partnership, IRM Action Plan Review: Sweden 2023–2025, 1 December 2023, <https://www.opengovpartnership.org/documents/sweden-action-plan-review-2023-2025>.

² Agency for Digital Government (Digg), "Stöd för öppna leverantörsreskontra - informationsklassning och riskanalys," [Support for open accounts payable - information classification and risk analysis], 18 March 2025, <https://www.dataportal.se/exempel-datadriven-transformation/stod-for-oppna-leverantorsreskontra-informationsklassning-och-riskanalys>

³ Ministry of Finance, "Uppdrag till Myndigheten för digital förvaltning att förbereda en överföring av vissa uppgifter till Upphandlingsmyndigheten," [Assignment to the Digital Governance Agency to prepare a transfer of certain data to the Procurement Authority], 16 December 2025, <https://www.regeringen.se/regeringsuppdrag/2025/12/uppdrag-till-myndigheten-for-digital-forvaltning-att-forbereda-en-overforing-av-vissa-uppgifter-till-upphandlingsmyndigheten/>

⁴ Ministry of Finance, Uppdrag till Statskontoret om en nationell upphandlingsdatabas och en analysfunktion för inköps- och upphandlingsdata [Assignment to the State Treasury regarding a national procurement database and an analysis function for purchasing and procurement data], 10 March 2026, <https://www.regeringen.se/regeringsuppdrag/2026/03/uppdrag-till-statskontoret-om-en-nationell-upphandlingsdatabas-och-en-analysfunktion-for-inkops--och-upphandlingsdata>.

⁵ Digg, Uppdrag att ansvara för genomförandet av Open Data Charters stadga Slutrapport i regeringsuppdraget Fi2023/01226 [Assignment to be responsible for the implementation of Open Data Charter Final report on government assignment Fi2023/01226], 10 April 2025, <https://www.digg.se/analys-och-uppfoljning/publikationer/publikationer/2025-04-24-uppdrag-att-ansvara-for-genomforandet-av-open-data-charters-stadga>; Ulrika Domellöf Mattsson (Digg), interview by the IRM, 23 September 2025.