

# Independent Reporting Mechanism

Results Report:  
Finland 2019-2023

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

## Executive Summary

**Finland’s fourth OGP action plan was the country’s first to span four years (2019—2023). Finland completed most commitments despite the COVID-19 pandemic and shift of national priorities following Russia’s full-scale military invasion of Ukraine. The action plan resulted in the adoption of a mandatory lobbying register and institutionalization of national dialogues as a new public participation method. Civil society played an active role in guiding and co-implementing commitments.**

### Early Results

Finland’s fourth action plan originally contained four commitments, with a fifth commitment added later. One commitment (3) yielded significant early results, while four achieved moderate early results in advancing open government. Commitment 3 (Transparency Register) was highlighted as noteworthy in the IRM Design Report and significantly advanced lobbying transparency in Finland. The government added Commitment 5 (national dialogues) to the action plan following a mid-term self-assessment. This commitment also produced strong early results by establishing a regular practice in the government of holding dialogues with citizens and building a multi-stakeholder network and governance structure to ensure the continuation of the practice.

### Completion

The action plan focused on promoting sustainable open government practices through public officials’ capacity-building and networking. It also sought to advance lobbying transparency, public participation, open data, and ethical use of Artificial Intelligence (AI). All commitments were fully or substantially completed, with relatively minor deviations from the original work plan and timeline. The Ministry of Finance (MoF) followed through both with commitments where the ministry had the sole responsibility for implementation (Commitment 2 – open government strategy) and those implemented in collaboration with civil society (Commitment 5 – national dialogues). The Ministry of Justice (MoJ) was responsible for Commitment 3 (transparency register). Although this commitment was the most complicated, the MoJ completed it on time thanks to extensive preparatory work carried out years before the start of the action plan.<sup>1</sup>

### Participation and Co-Creation

The Governance Policy Unit at the MoF continues to coordinate the OGP process in Finland. Two multi-stakeholder advisory bodies oversee the process: the Open Government Working Group

## IMPLEMENTATION AT A GLANCE



(*avoimen hallinnon työryhmä*), which is responsible for participating in the co-creation and supporting the implementation of OGP commitments<sup>2</sup> and the government's Civil Society Advisory Board (*kansalaisyhteiskuntapolitiikan neuvottelukunta – KANE*<sup>3</sup>), which has a broader mandate of advising the government's civil society policies. Following a highly collaborative co-creation process, civil society organizations (CSOs) also had an active role in implementing the commitments. CSOs had strong representation in the steering groups coordinating the implementation of CSO academies (Commitment 1) and national dialogues (Commitment 5). As standard practice, Finnish government institutions conducted online public consultations on all major policy initiatives. For the transparency register (Commitment 3), amendments to the Openness Act (Commitment 1), and the renewal of the open data policy framework (Commitment 4), the government also maintained regular dialogue with CSOs throughout commitment implementation by involving civil society in the advisory bodies established to guide commitment implementation.

### Implementation in context

Several unexpected events shaped the open government context during the action plan term. First, the COVID-19 pandemic revealed that information on public health measures was not readily available for users of easy language, such as people with migrant backgrounds and people with developmental disabilities.<sup>4</sup> The government discovered that many migrants who did not have a good command of Finnish had fallen victim to false information on pandemic-related mobility restrictions due to lack of understandable government-provided information.<sup>5</sup> This underlined the urgency of building public administration's capacity in easy language, which was part of Commitment 1. Government institutions thereafter strengthened their efforts to provide timely information on the crisis in easy language.<sup>6</sup> The government also launched the Lockdown Dialogues, a series of discussions bringing together participants from diverse sectors to discuss their life experiences during the pandemic.<sup>7</sup> The success of these dialogues in fostering participation and mutual understanding encouraged the government to introduce Commitment 5 to the action plan to establish a model for dialogues at the national level. At the same time, the pandemic delayed the implementation of certain milestones, such as developing guidelines for the ethical use of Artificial Intelligence (Commitment 4)<sup>8</sup> and creating an online version of the Openness Game (part of Commitment 1).<sup>9</sup>

Moreover, Russia's full-scale military invasion of Ukraine significantly changed the security situation in Finland, spurring Finland to join NATO at an unprecedented speed<sup>10</sup> and fostering political support to the open government agenda to fight undemocratic tendencies and prevent the polarization of society.<sup>11</sup> The influx of refugees from Ukraine resulting from the invasion also reinforced the need to provide government information in easy-to-understand language.<sup>12</sup>

<sup>1</sup> Niklas Wilhelmsson (Ministry of Justice), interview by the IRM, 13 February 2024.

<sup>2</sup> Ministry of Finance, Open Government Working Group, Avoimen hallinnon työryhmä 2019-2023, <https://vm.fi/hanke?tunnus=VM153:00/2019>

<sup>3</sup> Ministry of Justice, Advisory Board for Civil Society Policy KANE, Kansalaisyhteiskuntapolitiikan neuvottelukunta KANE <https://oikeusministerio.fi/kane>

<sup>4</sup> Open Government Partnership, Independent Reporting Mechanism (IRM): Finland Design Report 2019–2023, <https://www.opengovpartnership.org/documents/finland-design-report-2019-2023/>

<sup>5</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>6</sup> See, for example, Pipsa Lotta Marjamäki, Miten Kelan koronaviestinnässä on huomioitu selkeys ja selkokieli? 13 October 2020, [https://www.kotus.fi/files/8793/5\\_Marjamaki\\_Kela\\_Diat\\_Selkean\\_kielen\\_paiva.pdf](https://www.kotus.fi/files/8793/5_Marjamaki_Kela_Diat_Selkean_kielen_paiva.pdf)

<sup>7</sup> Elina Henttonen, Lockdown Dialogues: Crisis experiences and model for national dialogue, Sitra Studies 213, 2022, <https://www.sitra.fi/en/publications/lockdown-dialogues/>

<sup>8</sup> Open Government Partnership, Independent Reporting Mechanism (IRM): Finland Design Report 2019–2023, <https://www.opengovpartnership.org/documents/finland-design-report-2019-2023/>

<sup>9</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>10</sup> North Atlantic Treaty Organization, Relations with Finland, [https://www.nato.int/cps/en/natohq/topics\\_49594.htm](https://www.nato.int/cps/en/natohq/topics_49594.htm)

<sup>11</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>12</sup> Leelaura Leskelä (Selkokeskus), interview by the IRM, 11 March 2024.

## Table of Contents

Section I: Key Observations .....	1
Section II: Implementation and Early Results .....	3
Section III. Participation and Co-Creation .....	12
Section IV. Methodology and IRM Indicators .....	15
Annex I. Commitment Data.....	17

## Section I: Key Observations

Finland was the first OGP member to introduce a four-year action plan. Finland's positive experience with this format encouraged the government to continue with four-year action plans (the fifth action plan runs from 2023-2027). Thanks to the government's strong baseline in open government and deeply institutionalized collaboration with civil society, the government made use of open government approaches to help society cope with unexpected crises during the action plan term. One of the key achievements of the action plan – the establishment of a mandatory lobbying transparency register – was greatly facilitated by a participatory process.

### **Observation 1: The four-year action plan term enabled the government to focus on strong implementation, while maintaining flexibility.**

The Ministry of Finance (MoF) believes that adopting a four-year action plan term enabled the government to focus more energy on commitment implementation, rather than planning another action plan every other year.<sup>13</sup> This resulted in a high completion level of the commitments. According to the MoF, the longer action plan term also allowed the government to conduct a more thorough co-creation process. At the same time, Finland's experience demonstrated that a four-year action plan can provide flexibility to incorporate new priorities and react to changes in the context, as the government added a fifth commitment to the action plan after the mid-term self-assessment.<sup>14</sup> Thanks to the positive experience with the fourth action plan, the government decided to continue implementing four-year action plans. However, the MoF acknowledges that it is not clear to what extent the action plan results were influenced by the longer action plan term as opposed to the extraordinary factors (the COVID-19 crisis and Russia's full-scale invasion of Ukraine) that affected the open government context during implementation.

### **Observation 2: Crises and challenges opened new avenues for open government reforms.**

The COVID-19 pandemic was not only a challenge but also an opportunity for open government in Finland, thanks to the government's will and capacity to quickly respond to the crisis. As the Finnish government and its civil society partners were interested in alleviating citizens' anxiety at times of significant disruptions in society and economy, they came up with the innovative concept of Lockdown Dialogues to engage people from all walks of life to share experiences and reflections of life during the pandemic.<sup>15</sup> The dialogues built on the "Timeout" approach – a method for constructive and creative citizen engagement, which the public think tank Sitra had started developing in 2016.<sup>16</sup> As the method was relatively easy to implement, anyone interested was invited to organize dialogues. During 2020–2021, more than 100 organizers engaged 2,130 participants in the dialogues.<sup>17</sup> The positive societal reception of the Lockdown Dialogues spurred the inclusion of Commitment 5 into the fourth action plan in the middle of the action plan term to develop a model for regular national dialogues. Thanks to this commitment, the national dialogue approach was easily at hand in 2022 to respond to another crisis – the changed security situation following Russia's full-scale military invasion of Ukraine, when citizens were invited to the Democracy Defense dialogues to discuss ways of protecting democratic societies from internal and external threats.

### **Observation 3: Large-scale public participation initiatives benefited from multi-stakeholder governance mechanisms.**

Much of the success of Commitment 5 (national dialogues) related to its reliance on an expansive multi-stakeholder network of dialogue organizers and a steering mechanism (core operational group) that involves central and local public authorities as well as CSOs. As a result of the fourth action plan, a network of about 60 organizations and activists regularly organize national dialogues, in addition to a looser network of organizations that have organized at least one dialogue.<sup>18</sup> Membership in the regular organizers' network involves an obligation to conduct at least two dialogue events per year (two rounds of national dialogues are held each year – one in spring and one in fall). The core operational group, comprising seven public and non-governmental organizers, coordinates the selection of dialogue topics, synthesis of results and training of dialogue organizers, while the dialogues themselves are implemented by a broad network of organizations.<sup>19</sup> This model enables the government to share the burden of organizing citizen engagement, foster a broad sense of ownership of the dialogue process, and reach stakeholders and communities they may not be able to access on their own.

#### **Observation 4: Transparent and inclusive processes helped implement ambitious and complex commitments.**

One of the action plan's most notable outcomes was the establishment of a transparency register to collect and publish data on lobbying targeted at the parliament and ministries. The development of the register, along with the legal and governance framework, was a long and complex process which involved a variety of stakeholders, including members of parliament, public officials, civil society and interest groups, and independent institutions such as the National Audit Office of Finland. As the commitment coordinator, the Ministry of Justice sought a broad-based agreement on the content and regulations of the register to support future compliance with the reporting rules.<sup>20</sup> The ministry led an inclusive development process engaging stakeholders through a variety of methods such as a parliamentary steering group and a multi-stakeholder working group who guided the process, conducting online surveys, public consultations, and stakeholder workshops, and commissioning research from universities to support evidence-based decisions.<sup>21</sup> The process was highly transparent – the composition of the working group, lists of involved stakeholders, and meeting memos were published on the Ministry of Justice's website throughout implementation.<sup>22</sup> This approach helped ensure support from both coalition and opposition parties, which was crucial for the adoption of the new regulation.<sup>23</sup>

<sup>13</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>14</sup> Open Government Partnership, Finland Mid-Term Self-Assessment 2019–2023,

<https://www.opengovpartnership.org/documents/finland-mid-term-self-assessment-2019-2023/>

<sup>15</sup> Elina Henttonen, Lockdown Dialogues: Crisis experiences and model for national dialogue, Sitra Studies 213, 2022,

<https://www.sitra.fi/en/publications/lockdown-dialogues/>

<sup>16</sup> Elina Henttonen, Lockdown Dialogues: Crisis experiences and model for national dialogue, Sitra Studies 213, 2022,

<https://www.sitra.fi/en/publications/lockdown-dialogues/>

<sup>17</sup> Elina Henttonen, Lockdown Dialogues: Crisis experiences and model for national dialogue, Sitra Studies 213, 2022,

<https://www.sitra.fi/en/publications/lockdown-dialogues/>

<sup>18</sup> National Dialogues, Actors in National Dialogues, <https://kansallisetdialogit.fi/en/about-national-dialogues/actors-in-national-dialogues/>

<sup>19</sup> National Dialogues, Actors in National Dialogues, <https://kansallisetdialogit.fi/en/about-national-dialogues/actors-in-national-dialogues/>

<sup>20</sup> Niklas Wilhelmsson (Ministry of Justice), interview by the IRM, 13 February 2024.

<sup>21</sup> Ministry of Justice, Transparency register, Avoimuusrekisteri: Säädosvalmistelu (OM033:00/2019),

<https://valtioneuvosto.fi/hanke?tunnus=OM033:00/2019>

<sup>22</sup> Ministry of Justice, Transparency register, Avoimuusrekisteri: Säädosvalmistelu (OM033:00/2019),

<https://valtioneuvosto.fi/hanke?tunnus=OM033:00/2019>

<sup>23</sup> Niklas Wilhelmsson (Ministry of Justice), interview by the IRM, 13 February 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 noteworthy in the 2019-2023 Design Report as a starting point. After verification of completion evidence, the IRM also took into account commitments that were not determined to be noteworthy but that, as implemented, yielded predominantly positive or significant results.

### Commitment 3: Openness Register (Ministry of Justice)

#### Context and Objectives:

This commitment aimed to improve the transparency of decision-making by creating a public lobbying register. Despite low levels of perceived corruption,<sup>24</sup> Finland had no ethics guidelines, regulations, or open data on lobbying activities.<sup>25</sup> After several decades of debate on how to regulate lobbying,<sup>26</sup> policy makers and lobbyists have gradually become more open to the idea of setting up a lobbying register.<sup>27</sup> Finland's second OGP action plan produced a comparative report on other countries' lobbying register systems in 2018.<sup>28</sup> In spring 2019, a parliamentary working group was established to analyze the possibilities for regulating lobbying. The working group proposed to adopt a digital transparency register and relevant legislation during the next parliamentary term.<sup>29</sup> In 2019, the Finnish government reiterated the intention of establishing a transparency register in the National Democracy Program for 2025.<sup>30</sup> The goal was included in the fourth OGP action plan as Commitment 3.

#### Early Results: Significant

As a result of this commitment, Finland adopted a legal act on the transparency register (*avoimuusrekisterilaki*)<sup>31</sup> in 2023 and established a public online transparency register to collect and publish data on lobbying activities directed to the parliament and government ministries.<sup>32</sup> The law obliges lobbyists to register on the system, report their lobbying activities twice a year, and disclose their financial information annually. The law defines lobbyists as legal entities or private entrepreneurs carrying out systematic lobbying activities or lobbying consultancy (i.e. professional lobbying on behalf of a client).<sup>33</sup> Small-scale lobbying, defined as having fewer than five lobbying contacts per year, is excluded from the scope of the law.

Lobbyists are obliged to enter three types of data to the register: 1) the lobbying organization's basic data (including company name, business identifiers, main fields of activity, overview of operations, memberships of other organizations), 2) data on lobbying activities carried out in the past six months (lobbying targets, subjects discussed, contact methods); 3) key financial information for the calendar year (number of people who participated in the lobbying activities, costs of outsourced lobbying services, and other marketing and representation costs; lobbying consultants also need to report the turnover of lobbying-related consultancy services). In case of lobbying of senior officials, data on lobbying contacts needs to be specified at the level of the individual official; in other cases, the name of the organization is sufficient. The data on lobbying contacts is submitted in July for the first half of the calendar year and in January for the second half. The financial data is submitted once a year for the previous calendar year. The register became operational in January 2023 and started collecting lobbyists' basic company data. As of 30 March 2024, 779 organizations have signed up to the register.<sup>34</sup> In July-August 2024, the registered entities must disclose their lobbying activities for the first half of 2024, and



the first set of financial data will be collected in 2026 for the year 2025.<sup>35</sup> The public can view and filter all data online at a granular level and download the datasets in a CSV format for analysis.

While the Ministry of Justice coordinated the development of the legislation and IT system, the National Audit Office of Finland (NAOF) was appointed the legal owner of the register, with responsibilities to oversee lobbyists' compliance with the law and monitor notifications to the register. The NAOF has the obligation to report the operation and supervision of the lobbying registration system to the parliament once every parliamentary term. The report must give an overview of the contents of the register but could also examine the state of lobbying more generally. In addition, the NAOF has the right to impose conditional fines to sanction non-compliance. The government also established a multi-stakeholder advisory board in April 2023, which is tasked with monitoring the operation of the lobbying register, developing proposals for further development of the register, and drawing up guidelines for ethical lobbying as a soft law instrument to supplement the legal obligations. The advisory board has about 30 members, who represent public sector organizations, interest groups and lobbying organizations, CSOs, academia, and journalists.<sup>36</sup> The board published draft recommendations for ethical lobbying in March 2024 for public comment.<sup>37</sup>

According to the Ministry of Justice and participating CSOs, the process of developing the register was extremely complex due to the need to consider the interests of diverse stakeholders and strike a balance between the goals of transparency and reasonable administrative burden.<sup>38</sup> The Ministry of Justice prioritized securing buy-in from all relevant actors to ensure compliance with the new lobbying transparency rules.<sup>39</sup> The process was led by a parliamentary steering group, which met six times, and a multi-stakeholder working group, which held monthly meetings.<sup>40</sup> In more than two years, the ministry gathered input from a broad set of stakeholders through an online public survey,<sup>41</sup> several online stakeholder workshops,<sup>42</sup> and a public consultation on the draft proposal, which received 191 responses.<sup>43</sup> The ministry also commissioned studies to engage experts on lobbying transparency.<sup>44</sup> Although many of the CSOs' proposals on the scope and requirements of the regulation were not incorporated in the final draft due to political compromises, Transparency International (TI) Finland reports the Ministry of Justice and NAOF actively sought CSO input and accepted most of the CSOs' technical proposals for the design of the platform.<sup>45</sup>

Based on early evidence, this commitment has significantly changed Finland's lobbying transparency landscape. The country now has a legal framework, an operational lobbying register, an oversight mechanism to support the implementation of the legal obligations, and an advisory structure to lead the further development of lobbying transparency policies. In addition to having binding rules in place, the assignment of clear oversight responsibilities to the NAOF is paramount to enforce the regulation. According to the Ministry of Justice, the NAOF has sufficient capacity and human resources to implement and monitor the register, and is widely perceived as a strong, independent, and neutral institution.<sup>46</sup> Both the Ministry of Justice and CSOs note that while the NAOF's right to impose fines for non-compliance helps enforce the rules, public oversight works as an even stronger accountability mechanism since failure to submit data will be marked in the register and catch public and media attention.<sup>47</sup> Some CSOs such as TI Finland would have preferred even stronger deterrence such as lobbying bans to organizations that violate reporting obligations, but these proposals were rejected in the discussions due to potential negative impacts on lobbyists' rights.<sup>48</sup>

Despite considerably enhancing lobbying transparency at the national level, the scope of the register is more limited than CSOs had wanted. According to TI Finland, most lobbying takes place at the regional and local level and the government's justifications for excluding subnational administrations from the scope of the law were not convincing to them.<sup>49</sup> In the draft legislative proposal, the government argued that limiting the scope to the parliament and ministries would help avoid excessive administrative burden on lobbyists, increase clarity, and facilitate implementation of the new rules, especially in the initial roll-out phase.<sup>50</sup> The government also cited the results of the public consultation on the legislative draft where most of the participants (the vast majority representing CSOs and private companies) preferred this option over the alternatives,<sup>51</sup> as well as a 2021 study on lobbying practices in Finland, which identified the parliament and ministries as key lobbying targets.<sup>52</sup> The 2021 research, however, focused on lobbying practices at the state level, excluding the local and regional level. CSOs note that any initiative to extend reporting obligations to the local and regional levels will likely meet considerable resistance and may not happen in the foreseeable future. CSOs also suggested lobbyists should provide more detailed data on lobbying activities, including lobbying goals, messages, and the communication materials used for lobbying, so that external parties could compare the wording of legislative drafts and the lobbying materials.<sup>53</sup> While the eventual regulation maintained a narrow scope in terms of data reporting, the draft recommendations for ethical lobbying encourage lobbyists to disclose their lobbying materials voluntarily.<sup>54</sup>

In the commitment's original wording, the Ministry of Justice planned to analyze the possibilities for including records of the parties invited to parliamentary committee hearings and data on public officials' outside employment and private interests to the transparency register. Such datasets have not been integrated into the system as of March 2024. According to the Ministry of Justice, the government prioritized the timely launch of the register, and proposals for integrating additional datasets will be revisited in 2026 as part of the planned assessment of the register's first results.<sup>55</sup>

The ministry maintained a dedicated website throughout the development of the register, which included a timeline of the process, with each step linked to the related meeting memos and reports, survey and consultation links, and workshop summaries with lists of involved stakeholders.<sup>56</sup> The commitment coordinator believes a transparent and inclusive process helped build broad-based support and endorsement by parliamentary parties across the political spectrum, which greatly facilitated the adoption of the regulation.<sup>57</sup> At the same time, the coordinator stresses this commitment benefitted heavily from the preparations made years before the action plan, including the comparative study conducted as part of Finland's 2015-2017 action plan.

### **Looking Ahead:**

This commitment provides a strong basis for institutionalizing the disclosure of lobbying data. However, since the first datasets will only be collected to the register over the course of 2024-2026, it is too early to assess actual compliance with the rules. The parliament has requested that an impact assessment be conducted to evaluate the early results of the register and assess the need for extending its scope.<sup>58</sup> The impact assessment is scheduled for 2026.<sup>59</sup> Transparency experts continue to advocate for the inclusion of local and regional-level lobbying to the scope of the law,<sup>60</sup> which was also recommended in the IRM Design Report.<sup>61</sup> The IRM recommends the government to use the 2026 impact assessment to analyze the opportunities

and obstacles to expanding the regulation to local municipalities, regional administrations, and the new wellbeing service counties. Considering the complexities involved, the government could start by engaging local and regional policy makers and interest groups to gradually build common ground and co-create a roadmap for improving lobbying transparency in municipalities and regions.

It is also important to continue raising public awareness of the transparency register as an information and accountability tool. The Ministry of Justice and NAOF have published guidelines,<sup>62</sup> conducted campaigns and seminars,<sup>63</sup> and introduced the transparency register at the CSO academies (Commitment 1)<sup>64</sup> to familiarize interest groups with the new rules. Training courses for new public officials and the handbooks for ministers<sup>65</sup> and Members of Parliament also include information on the transparency register.<sup>66</sup> The IRM recommends the Ministry of Justice and NAOF also conduct awareness-raising campaigns for the public and media, so that citizens would become fully aware of their opportunities to monitor decision-making processes.

In addition to lobbying data, the transparency of political decision-making hinges on the accessibility of other datasets such as beneficial ownership and political financing data. Data from the beneficial ownership register can currently only be accessed on demonstrating legitimate interest<sup>67</sup> and CSOs note cases of high fees for access to documents that are not in a digital format.<sup>68</sup> Meanwhile, current political party and candidate financing rules do not require candidates who were not elected to publish their fundraising data, while parties and candidates may report financial support from third parties as rents or sales revenues without specifying the funding source, and cash donations need not be reported at all.<sup>69</sup> The Ministry of Justice is preparing legislative amendments to address these gaps.<sup>70</sup> The IRM recommends the Ministry of Justice draws on the high standards set by the transparency register to inform these legislative amendments.

### **Commitment 5: Strengthening the competence and use of dialogues** (Ministry of Finance)

#### **Context and Objectives:**

This commitment was driven by the onset of the COVID-19 pandemic, which left many people struggling to cope with the uncertainty and isolation related to the pandemic and lockdown measures. The Ministry of Finance, Timeout Foundation, the Finnish Innovation Fund (Sitra), and Dialogue Academy launched Lockdown Dialogues, a series of online and face-to-face discussions in 2020–2021 where people with diverse backgrounds had the opportunity to exchange their experiences and concerns.<sup>71</sup> The Lockdown Dialogues engaged 111 organizations from all around Finland to conduct 296 dialogue events that involved 2,130 people from various sectors.<sup>72</sup> In its 2021 scan of the civic space in Finland, the OECD recommended the government to continue this type of dialogue to restore public trust and improve the government's interaction with vulnerable and harder-to-reach societal groups.<sup>73</sup> Positive feedback from participants, endorsement by the OECD, and the priorities of the new Open Government Strategy developed as part of Commitment 2, propelled the government to include these dialogues as a new commitment after the mid-term self-assessment in September 2021.<sup>74</sup> Commitment 5 sought to establish dialogues with citizens as a regular form of civic participation by developing a model for national dialogues, piloting the model, and collaborating with researchers to document dialogue results and further develop the model.

### **Early Results: Moderate**

As a result of the commitment, a model of national dialogues was developed jointly by civil society and Ministry of Finance and other partners. In spring 2022, the government, Sitra and CSOs conducted the Democracy Defense dialogues to discuss ways of protecting democracy after Russia's full-scale military invasion of Ukraine.<sup>75</sup> The Ministry of Interior piloted the model in the national Migration Dialogues in autumn 2022<sup>76</sup> and the first nationwide dialogues using the national dialogue model were held in spring 2023 to discuss how citizens were coping with uncertainty and continuous crises. The "Life in uncertainty" dialogue series engaged 660 people through 86 dialogue events.<sup>77</sup> Altogether, the dialogues conducted in 2022–2023 engaged almost 2,000 participants through 229 dialogue events. The dialogues have mainly used the "Timeout" method, where small groups of people meet online or face-to-face and share their views on a predefined topic. This method is designed specifically to listen to participants and jointly develop a better understanding of a topic rather than inform decision-making.<sup>78</sup>

The model of the national dialogues is multi-sectoral and highly networked. The core operational group that coordinates the dialogues comprises public sector organizations (the Ministry of Finance, the Prime Minister's office and the municipality of Tuusula), a public think tank (Sitra), a CSO (Central Union for Child Welfare), and a private consultancy (Dialogue Academy).<sup>79</sup> The core group coordinates the selection of topics based on an open dialogue organized to find the next theme and input from dialogue participants (ideas for future topics are collected from participants at each event).<sup>80</sup> It also prepares background materials and organizes trainings for dialogue facilitators, and coordinates summaries of each round of dialogues in collaboration with researchers. Activists and organizations from any sector can sign up to run dialogues based on the topic and methodological framework provided by the operational core group. Organizers are encouraged to share discussion notes with the core group after the events. The core group publishes all information, background materials, and reports relating to the dialogues on the central website [kansallisetdialogit.fi](https://kansallisetdialogit.fi).<sup>81</sup> This means the central government is responsible for providing the general framework and ensuring feedback from individual events back to the government, while the actual engagement is conducted by organizations and individuals who are best placed to reach diverse constituencies and networks.

Civil society has welcomed the dialogues as a new participation mechanism to complement more traditional methods like public consultations and working groups. According to Ulla Siimes, a CSO representative in the core operational group, the model from the commitment is easy to use by different actors in different circumstances.<sup>82</sup> She characterizes her own experiences in the dialogues as "eye-opening" and "touching" as the dialogues have created a unique space where people are willing to listen to other people's thoughts and share their experiences – even difficult ones, such as personal experiences of discrimination and racism. Siimes also cites feedback from other participants, who claim not having experienced the same level of connection with strangers before.

In a few years, the dialogues have managed to engage a diverse group of stakeholders as dialogue organizers and participants, including vulnerable groups, although there is room for greater diversity.<sup>83</sup> Ulla Siimes considers the diversity of participants a key outcome of the commitment – she claims the dialogues have succeeded in reaching stakeholders beyond "white middle-class men" and bringing decision makers together with citizens.<sup>84</sup> The OECD refers to the importance of personalized invitations and societal networks in encouraging the participation of marginalized or underrepresented groups.<sup>85</sup> Although the government has not

evaluated the impacts of the dialogues on people's trust in government and fellow citizens, the focus on inclusion of diverse societal networks in the dialogues' implementation has the potential to drive greater public trust.

The dialogues' governance structure is highly collaborative. While it is common for different actors in Finland to work together, CSOs appreciate the inclusion of diverse stakeholders in the core group working to develop and continuously improve a new public engagement model.<sup>86</sup> Ulla Siimes feels the core group has a good balance of representation from different sectors and the CSOs work as equal partners alongside the government.<sup>87</sup> The core group uses dialogic methods to co-develop the national dialogue model.

The dialogues have also had spillover effects. Dialogues have been used at a smaller scale in the CSO Academies and regional open government tour conducted in the framework of Commitment 1. Regular dialogue organizers have also begun disseminating Finland's good practices in other countries. For example, the Finnish Institute in Estonia is promoting the use of dialogues for inclusive societal debate in Estonia<sup>88</sup> and is collaborating with Estonian CSOs to help them use the dialogue format for local community engagement.<sup>89</sup>

Overall, this commitment has so far yielded moderate early results in improving practices in citizens' participation in decision-making and the enabling environment to build trust between citizens and the state. It has established a regular practice of dialogue between government and citizens and has built a multi-stakeholder governance structure to ensure the sustainability of the practice. In addition to inclusivity and diversity of participation, coordinators have also prioritized the transparency of implementation, aggregating information on the dialogues to a central website and ensuring that summaries of the discussions are public. The dialogues therefore have the potential to build trust between government and citizens in the future.

### **Looking Ahead:**

Finland continues strengthening the impact of the national dialogues in the fifth action plan (2023-2027). Commitment 1.1. of the fifth action plan aims to increase the number and diversity of dialogue organizers and participants and foster the use of input from the dialogues in policy-making processes through the preparation of shorter thematic summaries of dialogues and forwarding the results to government agencies, municipalities, and the new wellbeing services counties.<sup>90</sup> So far, the operational core group has collaborated with researchers to publish summaries of all dialogues. Although the government has not systematically monitored the use of the summaries, some cases are known. For example, the municipality of Tuusula used summaries of the national dialogues as part of their process to create a statutory wellbeing account and plan for the municipality.<sup>91</sup> To increase usage, the core operational group will coordinate the production of shorter thematic summaries of dialogues and encourage central government institutions, and local and regional authorities to use the summaries to inform public policy.<sup>92</sup> The IRM recommends the government to engage local and regional authorities in adapting the dialogue method in conducting local dialogues and using input from the dialogues in policy-making.<sup>93</sup> The IRM also recommends the government systematically monitor references to the dialogues in policy documents and publish the results on the [kansallisetdialogit.fi](https://kansallisetdialogit.fi) website to give the public an indication of the impact of their participation. To reach vulnerable groups, the government could also produce guidelines for dialogue organizers to ensure the accessibility of meeting venues, as well as provide information on

dialogues in easy language. One of the first steps could be the provision of an easy-language version of key materials on [kansallisetdialogit.fi](https://kansallisetdialogit.fi).

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<sup>25</sup> Open Government Partnership, Independent Reporting Mechanism (IRM): Finland Design Report 2019–2023, <https://www.opengovpartnership.org/documents/finland-design-report-2019-2023/>

<sup>26</sup> Ministry of Justice, Transparency register, <https://oikeusministerio.fi/en/project?tunnus=OM033:00/2019>

<sup>27</sup> Group of States against Corruption (GRECO), Fifth Evaluation Round: Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies. Evaluation report Finland, 2018, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680796d12>

<sup>28</sup> Emilia Korkea-aho and Paul Tiensuu, International Models for the Lobbyist Register, 2018, Lobbarekisterin kansainväliset mallit, <http://urn.fi/URN:ISBN:978-952-287-608-9>

<sup>29</sup> Ministry of Justice, Transparency register, <https://oikeusministerio.fi/en/project?tunnus=OM033:00/2019>

<sup>30</sup> Ministry of Justice, National Democracy Programme 2025, Kansallinen demokratiaohjelma 2025, OM036:00/2019, <https://valtioneuvosto.fi/hanke?tunnus=OM036:00/2019>

<sup>31</sup> Finlex, Transparency Register Act, Avoimuusrekisterilaki, 23.3.2023/430, <https://www.finlex.fi/fi/laki/ajantasa/2023/20230430>

<sup>32</sup> The transparency register has been opened, Avoimuusrekisteri, <https://avoimuusrekisteri.fi>

<sup>33</sup> Finlex, Transparency Register Act, Avoimuusrekisterilaki, 23.3.2023/430, §3 (Velvollisuus ilmoittautua avoimuusrekisteriin) <https://www.finlex.fi/fi/laki/ajantasa/2023/20230430>

<sup>34</sup> Transparency register, Registrations, <https://avoimuusrekisteri.fi/en/ilmoitukset/rekisterointi-ilmoitukset>

<sup>35</sup> Transparency register, Timetable, <https://avoimuusrekisteri.fi/en/ajankohtaista/aikatauluja>

<sup>36</sup> Transparency register, Advisory board, <https://avoimuusrekisteri.fi/en/perustietoa/neuvottelukunta>

<sup>37</sup> Transparency Register, Hearing, Kuulemistilaisuus: Lobbauksen eettiset suositukset 11.4.2024 klo 9, <https://avoimuusrekisteri.fi/ajankohtaista/uutiset/kuulemistilaisuus-lobbauksen-eettiset-suositukset-11-4-2024-klo-9>

<sup>38</sup> Ilkka Penttinen Fouto (Transparency International Finland), interview by the IRM, 23 February 2024, and Niklas Wilhelmsson (Ministry of Justice), interview by the IRM, 13 February 2024.

<sup>39</sup> Niklas Wilhelmsson (Ministry of Justice), interview by the IRM, 13 February 2024.

<sup>40</sup> Ministry of Justice, Transparency register, <https://oikeusministerio.fi/en/project?tunnus=OM033:00/2019>

<sup>41</sup> Ministry of Justice, Kysely avoimuusrekisterivalmistelusta, 17 April–6 May 2020, <https://www.otakantaa.fi/fi/hankkeet/448/osallistuminen/831/kysely/>

<sup>42</sup> Ministry of Justice, Yhteenveto avoimuusrekisterivalmistelun verkkotyöpajasta 1–12 June 2020, memo published on 7 July 2020, [https://api.hankeikkuna.fi/asiakirjat/7364026e-4e68-46ef-b06a-caa53c7549e0/70637689-5820-40ea-82f2-48014fd2110c/MUISTIO\\_20200708130320.pdf](https://api.hankeikkuna.fi/asiakirjat/7364026e-4e68-46ef-b06a-caa53c7549e0/70637689-5820-40ea-82f2-48014fd2110c/MUISTIO_20200708130320.pdf); Ministry of Justice, Yhteenveto avoimuusrekisterityöpajasta, 2–13 November 2020, memo published on 28 January 2021, [https://api.hankeikkuna.fi/asiakirjat/7364026e-4e68-46ef-b06a-caa53c7549e0/8cf1ab7e-e31f-47ab-9f3f-f0997f335c62/YHTEENVETO\\_20210128105415.pdf](https://api.hankeikkuna.fi/asiakirjat/7364026e-4e68-46ef-b06a-caa53c7549e0/8cf1ab7e-e31f-47ab-9f3f-f0997f335c62/YHTEENVETO_20210128105415.pdf)

<sup>43</sup> Lausuntopyyntö parlamentaarisen ohjausryhmän ja asiantuntijatyöryhmän mietinnöstä, luonnos hallituksen esitykseksi avoimuusrekisterilaiksi, VN/4118/2019, 2 December 2021 – 31 January 2022,

<https://www.lausuntopalvelu.fi/FI/Proposal/Participation?proposalId=406e4bf9-022f-41d7-805f-b6b35dedb4e4>

<sup>44</sup> Aino Hirvola, Salla Mikkonen, Mika Skippari and Paul Tiensuu, Kohti avoimempaa lobbausta: Lobbauksen nykytila Suomessa valtiollisella tasolla, Publications of the Ministry of Justice, 2021,

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<sup>45</sup> Ilkka Penttinen Fouto (Transparency International Finland), interview by the IRM, 23 February 2024.

<sup>46</sup> Niklas Wilhelmsson (Ministry of Justice), interview by the IRM, 13 February 2024.

<sup>47</sup> Ilkka Penttinen Fouto (Transparency International Finland), interview by the IRM, 23 February 2024, and Niklas Wilhelmsson (Ministry of Justice), interview by the IRM, 13 February 2024.

<sup>48</sup> Ilkka Penttinen Fouto (Transparency International Finland), interview by the IRM, 23 February 2024.

<sup>49</sup> Ilkka Penttinen Fouto (Transparency International Finland), interview by the IRM, 23 February 2024.

<sup>50</sup> Government proposal, Hallituksen esitys HE 98/2022 vp, Hallituksen esitys eduskunnalle avoimuusrekisterilaiksi, Section 5.1, [https://www.eduskunta.fi/FI/vaski/HallituksenEsitys/Sivut/HE\\_98+2022.aspx](https://www.eduskunta.fi/FI/vaski/HallituksenEsitys/Sivut/HE_98+2022.aspx)

<sup>51</sup> Lausuntopyyntö parlamentaarisen ohjausryhmän ja asiantuntijatyöryhmän mietinnöstä, luonnos hallituksen esitykseksi avoimuusrekisterilaiksi, VN/4118/2019, 2 December 2021 – 31 January 2022,

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- <sup>54</sup> Transparency Register, Lobbauksen eettiset suositukset, March 2023. [https://assets.ctfassets.net/n7rypdarbf5/5JVXxHgtYmDEFnpjKKysk/6f9c384aacdf4bc9a8f954d3016c9b6/Luonnos\\_Lobbauksen\\_eettiset\\_suosituks.pdf](https://assets.ctfassets.net/n7rypdarbf5/5JVXxHgtYmDEFnpjKKysk/6f9c384aacdf4bc9a8f954d3016c9b6/Luonnos_Lobbauksen_eettiset_suosituks.pdf)
- <sup>55</sup> Niklas Wilhelmsson (Ministry of Justice), interview by the IRM, 13 February 2024.
- <sup>56</sup> Ministry of Justice, Avoimuusrekisteri: Säädösvalmistelu (OM033:00/2019), <https://oikeusministerio.fi/en/project?tunnus=OM033:00/2019>
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- <sup>59</sup> Niklas Wilhelmsson (Ministry of Justice), interview by the IRM, 13 February 2024.
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- <sup>67</sup> Finnish Patent and Registration Office, Beneficial owner extract, <https://www.prh.fi/en/kaupparekisteri/tietopalvelut/beneficial-owner-extract.html>
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<sup>87</sup> Ulla Siimes (Finnish Central Union for Child Welfare), correspondence with the IRM, 23 March 2024.

<sup>88</sup> Hannele Valkeeniemi and Kairi Tilga, Hannele Valkeeniemi ja Kairi Tilga: valimised kui lõhkise dialoogi formaat, 1 March 2023, <https://www.err.ee/1608900491/hannele-valkeeniemi-ja-kairi-tilga-valimised-kui-lohkise-dialoogi-formaat>

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### Section III. Participation and Co-Creation

**The government led highly participatory co-creation and implementation processes. Extensive stakeholder engagement during action plan co-creation was followed by active participation of CSOs in commitment implementation as members of working groups and co-implementers of commitments.**

The Ministry of Finance (MoF) continues to coordinate the OGP process in Finland. Four public officials and an assistant work in the open government team at the MoF. The OGP-related workload of the team members amounts to about 20 percent of their working time (a large part of which has been related to coordinating the national dialogues in recent years).<sup>94</sup> Since a senior team member passed away during action plan implementation, the team lost important expertise and know-how, which has taken time to recover. The open government team has an annual budget of 80,000 EUR for organizing activities related to the action plan. According to the OGP point of contact (PoC) in the ministry, organizing events such as the Day of the Elderly Citizens' Council or Day of the Council for People with Disabilities costs about 15,000 EUR, which is 20 percent of the annual budget.<sup>95</sup> In 2023, the ministry could not organize the Day of the Council for People with Disabilities because the Ministry of Social Affairs and Health was not able to provide the planned co-funding.

Civil society contributed substantially both to the co-creation and implementation of the fourth action plan. The open government working group and the Civil Society Policy Advisory Board (KANE) continued to serve as the multi-stakeholder forum (MSF), overseeing the co-creation and implementation of the action plan. The members of the working group were appointed for the duration of the action plan. The working group has a mandate to support the implementation of action plan commitments, maintain collaboration with civil society, monitor implementation, and carry out a mid-term evaluation of the action plan.<sup>96</sup> The MoF drafted the working group's mandate and members could comment on the draft.<sup>97</sup> KANE has a broader mandate to advise the government on general civil society-related issues.<sup>98</sup> The selection procedure for membership is explained on KANE's website<sup>99</sup> but not on the open government working group's website. Both bodies include an equal balance of public sector and non-governmental participants. However, CSOs believe the composition of the working group could be more diverse, as many CSO members currently represent the social and health sectors.<sup>100</sup>

To facilitate participation in the co-creation process, the MoF prepared a background memorandum on OGP.<sup>101</sup> The ministry conducted extensive engagement, targeting CSOs that had not participated in the OGP process before. The MoF combined various engagement methods, including individual interviews, dialogues with local municipalities and CSOs, a survey of government agencies, public events, and online public consultations for soliciting citizens' input, a workshop with KANE, and discussions of the co-creation process with the open government working group. The MoF published a summary of stakeholders' ideas collected in the first phase of co-creation.<sup>102</sup> After putting the first draft of the action plan up for online public consultation in August 2019, the MoF compiled a revised version based on the public comments with changes tracked. The final action plan included several new ideas proposed by CSOs, including the annual CSO Academies (part of Commitment 1), proposed by the Finnish Federation of the Visually Impaired.

CSOs were also heavily involved in monitoring and discussing action plan progress through the open government working group, and in the implementation of specific commitments. The MSF met 21 times during the implementation period.<sup>103</sup> The level of CSO participation in implementation beyond the MSF was higher compared to previous action plans. For example, CSOs co-implemented the CSO Academies and courses on easy language (Commitment 1) and national dialogues (Commitment 5). CSOs were also involved in working groups and advisory bodies to guide the development of the transparency register (Commitment 3), amendments to the Openness Act (Commitment 1), and renewal of the open data policy framework (Commitment 4). Several commitments involved public consultations on draft policy proposals. In 2020, the MoF also organized a regional tour in eight cities to discuss the possibilities for advancing open government with local and regional administrations.

The MoF was satisfied with the constructive collaboration between the government and civil society. While the collaboration was strong for the previous action plans, this action plan involved CSOs more actively in the technical work and decision-making related to commitment implementation.

### Compliance with the Minimum Requirements

The IRM assesses whether member countries met the minimum requirements under OGP's Participation and Co-Creation Standards for the purposes of procedural review.<sup>104</sup> During co-creation, Finland acted according to the OGP process. The two minimum requirements listed below must achieve at least the level of 'in progress' for a country to have acted according to OGP process.

Key:

Green= Meets standard

Yellow= In progress (steps have been taken to meet this standard, but standard is not met)

Red= No evidence of action

Acted according to OGP process during the implementation period?	
The government maintained an OGP repository <sup>105</sup> that is online, updated at least once during the action plan cycle, and contains evidence of development <sup>106</sup> and implementation of the action plan. <sup>107</sup>	Green
The government provided the public with information on the action plan during the implementation period. <sup>108</sup>	Green

<sup>94</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>95</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>96</sup> Ministry of Finance, Open Government Working Group, Avoimen hallinnon työryhmä 2019–2023, VM153:00/2019, <https://vm.fi/hanke?tunnus=VM153:00/2019>

<sup>97</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 April 2020.

<sup>98</sup> Ministry of Justice, Advisory Board on Civil Society Policy (KANE), <https://oikeusministerio.fi/en/advisory-board-on-civil-society-policy>

<sup>99</sup> Ministry of Justice, Kansalaisyhteiskuntapolitiikan neuvottelukunnan asettaminen 2022-2026: memo 27 January 2022, [https://api.hankeikkuna.fi/asiakirjat/9f35f1fb-186c-4172-bfa2-55ae84d8bc68/7a2e5c7c-4d8a-490d-90ef-b0c9df61aff8/ASETTAMISPAATOS\\_20240103075026.PDF](https://api.hankeikkuna.fi/asiakirjat/9f35f1fb-186c-4172-bfa2-55ae84d8bc68/7a2e5c7c-4d8a-490d-90ef-b0c9df61aff8/ASETTAMISPAATOS_20240103075026.PDF)

<sup>100</sup> Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.

<sup>101</sup> See the IRM Design Report for a more detailed description of the co-creation process, <https://www.opengovpartnership.org/documents/finland-design-report-2019-2023/>

<sup>102</sup> Ministry of Finance, Avoin hallinto IV toimintaohjelman laadinta, July 2019, [https://avoinhallinto.fi/assets/files/2019/07/Mitäkuulimme\\_Heinäkuu2019.pdf](https://avoinhallinto.fi/assets/files/2019/07/Mitäkuulimme_Heinäkuu2019.pdf)

<sup>103</sup> The meeting minutes are available on the working group's website, <https://vm.fi/hanke?tunnus=VM153:00/2019>

<sup>104</sup> Please note that future IRM assessment will focus on compliance with the updated OGP Co-Creation and Participation Standards that came into effect on 1 January 2022, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.

<sup>105</sup> Finland's OGP repository, <https://avoinhallinto.fi>

<sup>106</sup> A detailed overview of the action plan co-creation process is attached to action plan documents, <https://avoinhallinto.fi/toimintaohjelmat/>

<sup>107</sup> Finland maintained a commitment-by-commitment overview of action plan implementation, <https://avoinhallinto.fi/toimeenpano/>. However, the tracker was no longer updated at the end of the action plan term due to the planned transition to a new website design (Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024).

<sup>108</sup> In addition to progress tracker (<https://avoinhallinto.fi/toimeenpano/>), the Ministry of Finance published monthly newsletters on action plan implementation, <https://avoinhallinto.fi/materiaalipankki/>

## 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. 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.<sup>109</sup>

### Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.<sup>110</sup> 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 Andy McDevitt, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM's International Experts Panel (IEP).<sup>111</sup> For more information on IRM methodology and processes, refer to the IRM website,<sup>112</sup> Action Plan Review methodology section, or the OGP glossary.<sup>113</sup>

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<sup>109</sup> Finland's OGP Repository, date accessed 14 February 2024, <http://avoinhallinto.fi>

<sup>110</sup> 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.

<sup>111</sup> For the latest information on the IRM International Experts Panel see, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>

<sup>112</sup> Open Government Partnership, *IRM Overview*, <https://www.opengovpartnership.org/irm-guidance-overview/>

<sup>113</sup> Open Government Partnership, *OGP Glossary*, <https://www.opengovpartnership.org/glossary/>

## Annex I. Commitment Data<sup>114</sup>

### Commitment 1: Sustainable openness

<p>€ <b>Verifiable:</b> Yes</p> <p>€ <b>Does it have an open government lens?</b> Yes</p> <p>€ <b>Potential for results:</b> Modest</p>	<p>€ <b>Completion:</b> Substantial</p> <p>€ <b>Early results:</b> Moderate</p>
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Commitment 1 aimed to build public officials' competences and capacities in open government. It involved a wide range of activities, from developing online trainings to conducting learning events to build connections between government and civil society. The commitment was mostly implemented but a few milestones were not completed, and several were modified during implementation.

As a result of this commitment, the government coordinated six online courses on clear administrative language for public officials (available to the public for free on the eOppiva learning platform), an online course on easy language (available on eOppiva), and online courses on accessibility and information visualization. The Ministry of Finance also collaborated with the Center for Finnish Languages KOTUS and the easy language center Selkokeskus to continue issuing biennial awards for information provision in clear administrative language and easy language. However, the government did not produce a course on easy Swedish, as mentioned in the original action plan. The support package on visualization was also not implemented as planned – instead, the ministry plans to assemble and share good practices of information visualization on the national OGP website.<sup>115</sup>

Evidence of the results of these milestones is mixed. On the one hand, in less than a year, only about 700 people have taken the easy language course.<sup>116</sup> This could be due to the voluntary nature of the course, although the government and Selkokeskus had advertised it in blog posts and through the advisory board for easy language which has over 60 members. At the same time, the MoF's 2023 survey of public sector organizations indicates that the number of organizations using easy language has slightly increased (from 20 percent of responding organizations in 2020 to 25 percent in 2023) and the use of clear administrative language has increased from 58 percent in 2020 to 79 percent in 2023 (the figures should be taken with caution since the sample was not representative).<sup>117</sup> An easy language expert from Selkokeskus believes the e-learning course and dissemination activities have likely increased public sector organizations' awareness of considering linguistic diversity in their communication.<sup>118</sup> However, she notes it is important to ask what kind of materials public organizations are publishing in easy language – if resources are limited, organizations should prioritize publishing the most vital information in easy language, such as administrative forms and materials that are only available online. The IRM Design Report also raised the issue of lack of a public institution with the responsibility to support the use of easy language the way KOTUS is responsible for promoting clear administrative language.<sup>119</sup> This issue is still unresolved at the end of the action plan and likely inhibits substantial progress in this area. Experts suggest including easy language to the mandate of the ongoing national review of the state of Finnish language<sup>120</sup> to assess whether legislative mechanisms are needed to ensure access to public information in easy language.<sup>121</sup>

The milestone related to the support package on open government was completed and the Openness Game produced during Finland's third action plan was translated into Swedish. The MoF planned to collaborate with students to develop an online version of the game, but students left the project due to the COVID-19 pandemic. The production of the online game was delayed to spring 2024.<sup>122</sup> In 2020, the government organized eight events across Finland to learn about local governments' ideas for advancing open government. Three were in-person events and the others were conducted online or in a hybrid format due to the pandemic.<sup>123</sup> The events also included dialogues using the "Timeout" method, which were used as input to the Open Government Strategy (Commitment 2). In 2021, the government and civil society partners held the new annual event of the Day for the Council of People with Disabilities and in 2022 a joint Day for the Council of People with Disabilities and the Elderly Citizens Council. In 2023, the ministry only organized the Day of the Elderly Citizens Council due to resource constraints.<sup>124</sup>

The commitment also included a milestone to update the Act on the Openness of Government Activities to support the enforcement of transparency principles in public officials' work. The Ministry of Justice set up a working group involving CSOs, which submitted its proposal for legislative amendments for public consultation in December 2023,<sup>125</sup> after the end of the action plan. The amendments proposed to expand the scope of the Openness Act to a broader set of public administration activities besides exercise of public power, and to entities under the control of public institutions and companies.<sup>126</sup> The proposal also clarifies public officials' obligations in handling requests for information and harmonizes data protection requirements, which could help alleviate the problem of public officials' frequent misinterpretations of privacy regulations.<sup>127</sup> As of March 2024, the public consultation has collected more than 230 comments and was scheduled to end on 18 April 2024.

One of the key parts of this commitment was the launch of CSO Academies.<sup>128</sup> In collaboration with CSOs and the Ministry of Justice, the MoF organized six national CSO Academies and two regional academies to increase public officials' awareness of civil society's work and foster dialogue and networking between public officials and CSOs. Most of the academies had more than 100 participants. However, the ratio of CSO/government representatives is heavily skewed toward CSOs.<sup>129</sup> Based on feedback surveys, participants were satisfied with the content and arrangement of the events but wished for more active participation from public officials.<sup>130</sup> CSOs believe the academies have fallen short of the goal of improving public officials' competences in relation to civil society.<sup>131</sup> The MoF believes the key outcomes of the academies have been new contacts between the government and CSOs and a common understanding of topics that both the public sector and CSOs work on.<sup>132</sup> The events have included "Timeout" dialogues to develop a shared understanding of topics such as public funding for civil society<sup>133</sup> or the empowerment of vulnerable groups.<sup>134</sup> Despite low interest from public officials, CSOs value the opportunity to learn about new legislative drafts at the academies.<sup>135</sup> As an unplanned result, the MoF published an open e-learning course for public officials based on content from previous academies.<sup>136</sup> The course gives a quick overview of how civil society works and how public officials can collaborate with CSOs. The aim is to give public officials basic background knowledge before attending CSO Academies, so that the academies focus on more topical and thematic discussions.<sup>137</sup> CSOs appreciate the e-learning course as an educational material on civil society and suggest the course could be

integrated into new public officials' orientation packages.<sup>138</sup> An additional value of the commitment has been the active role of civil society in organizing the academies. In addition to the MoF, Ministry of Justice, and the city of Helsinki, the CSO academy planning group includes eight CSOs.<sup>139</sup>

### Commitment 2: Open government strategy

<ul style="list-style-type: none"> <li>€ <b>Verifiable:</b> Yes</li> <li>€ <b>Does it have an open government lens?</b> Yes</li> <li>€ <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>€ <b>Completion:</b> Complete</li> <li>€ <b>Early results:</b> Moderate</li> </ul>
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This commitment resulted in the adoption of a government-wide Open Government Strategy (OGS) in 2020, initiated to determine the long-term direction of open government work. The OGS is intended to complement OGP action plans.<sup>140</sup> Although the OGS was originally planned to be part of Finland's Public Governance Strategy, it was adopted as an independent document because it emphasizes collaboration with civil society, while the Public Governance Strategy focuses more narrowly on public officials.<sup>141</sup> The OGS has a longer time perspective than the four-year OGP action plans. It formulates four long-term priorities for open government: 1) dialogue in society, 2) understandability of government information, 3) leadership and competence to ensure everyone's opportunity to participate, and 4) active promotion of open government internationally. The adoption of the strategy prompted the government to amend the fourth OGP action plan by adding Commitment 5 (national dialogues). The commitments in the fifth action plan also closely correspond to the strategy's priorities, although the priority topics were not restricted in the co-creation process.

The MoF developed the strategy in collaboration with public sector organizations and CSOs, also using input from municipalities gathered during the regional open government tours conducted in eight towns in 2020.<sup>142</sup> However, apart from the MoF, other ministries have not taken up the OGS to guide their activities. The OGS has not been included in public officials' handbook or other mechanisms whereby officials are commonly familiarized with new strategies. According to the MoF, the government already has more than 300 strategies in place, which makes it challenging to integrate additional ones into public officials' work.<sup>143</sup>

### Commitment 3: Transparency register

<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Substantial</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> Significant</li> </ul>
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This commitment is assessed in Section II above.

### Commitment 4: Open data

<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> Moderate</li> </ul>
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<ul style="list-style-type: none"> <li>• <b>Potential for results:</b> Modest</li> </ul>	
<p>Commitment 4 aimed to advance the accessibility, usability, and quality of open data to support the transposition of the European Union’s (EU) 2019 Open Data Directive.<sup>144</sup> It also aimed to develop guidelines for the ethical use of Artificial Intelligence (AI) solutions. During the action plan term, the government transposed the EU Open Data Directive and adopted the Act on the Re-use of Information by Companies Providing Certain Services of General Interest, and the Act on the Re-use of Research Materials Produced on Public Funding, as well as amending the Act on Information Management in Public Administration, and the Act on the Openness of Government Activities. While the legislative changes were not part of the commitment’s milestones, the results of the commitment complemented the mandatory policy framework with a clear strategic vision, roadmap, and guidelines to support the obligated organizations’ work on data sharing and publication.</p> <p>More specifically, the government adopted a strategic resolution on opening and using public data, a roadmap for 2022-2026, data quality criteria and indicators, an operating model for data sharing, and guidelines for the use of Application Programming Interfaces (API).<sup>145</sup> The common guidelines help shape more uniform data publication practices across public administration. Additionally, the focus on data quality and use of advanced data sharing mechanisms (such as APIs) is a positive step toward improved usability of government datasets. At the same time, Finland (apart from the Helsinki region) still lags in promoting the available datasets, monitoring the use of the published data, fostering reuse, and engaging data users to better respond to community needs.<sup>146</sup> This is a persistent gap that the central government could address to significantly boost the creation of social and economic value from open data. Civil society stakeholders recommend the government take a strategic focus on fostering demand and consider measures such as grants or competitive bids to stimulate the creation of user-driven applications based on open government data.<sup>147</sup></p> <p>The MoF also produced guidelines for the ethical use of AI, which lists key ethics principles that public sector organizations should keep in mind when using AI solutions.<sup>148</sup> The government had not implemented measures to ensure public administration’s compliance with the AI ethics guidelines by the end of the action plan. However, the fifth action plan foresees workshops for public officials to promote the use of the guidelines in public administration’s work.<sup>149</sup></p>	
<p><b>Commitment 5: Strengthening competence and use of dialogues</b></p>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> Significant</li> </ul>
<p>This commitment is assessed in Section II above.</p>	

<sup>114</sup> 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 Finland’s action plan: <https://www.opengovpartnership.org/documents/finland-action-plan-2019-2023/>
3. For more information on the assessment of the commitments’ design, see Finland’s Design Report: <https://www.opengovpartnership.org/documents/finland-design-report-2019-2023/>

<sup>115</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>116</sup> Leealaura Leskelä (Selkokeskus), interview by the IRM, 11 March 2024.

<sup>117</sup> Ministry of Finance, Open Government Survey 2023 (shared with IRM by e-mail on 28 November 2023).

<sup>118</sup> Leealaura Leskelä (Selkokeskus), interview by the IRM, 11 March 2024.

<sup>119</sup> Open Government Partnership, Independent Reporting Mechanism (IRM): Finland Design Report 2019–2023, <https://www.opengovpartnership.org/documents/finland-design-report-2019-2023/>

<sup>120</sup> Government of Finland, Suomen kielen selvityshenkilö, OM073:00/2022, <https://valtioneuvosto.fi/hanke?tunnus=OM073:00/2022>

<sup>121</sup> Leealaura Leskelä (Selkokeskus), interview by the IRM, 11 March 2024.

<sup>122</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>123</sup> Open Government Partnership, Finland Mid-Term Self-Assessment 2019–2023, <https://www.opengovpartnership.org/documents/finland-mid-term-self-assessment-2019-2023/>

<sup>124</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>125</sup> Työryhmän mietintö julkisuuslain ajantasaistamisesta. Lausuntopyyntö VN/27452/2020/, <https://www.lausuntopalvelu.fi/FI/Proposal/Participation?proposalId=36b68e41-af19-40b9-bafc-fca0a08be6c7&proposalLanguage=da4408c3-39e4-4f5a-84db-84481bafc744>

<sup>126</sup> Ministry of Justice, Working group proposes reform of the Act on the Openness of Government Activities, Työryhmä ehdottaa julkisuuslakia uudistettavaksi, 12 December 2023, <https://oikeusministerio.fi/-/tyoryhma-ehdottaa-julkisuuslakia-uudistettavaksi>

<sup>127</sup> Open Government Partnership, Independent Reporting Mechanism (IRM): Finland Design Report 2019–2023, <https://www.opengovpartnership.org/documents/finland-design-report-2019-2023/>

<sup>128</sup> Open Government Partnership, Independent Reporting Mechanism (IRM): Finland Design Report 2019–2023, <https://www.opengovpartnership.org/documents/finland-design-report-2019-2023/>

<sup>129</sup> Pauliina Pussinen (Ministry of Finance), correspondence with the IRM, 14 December 2023.

<sup>130</sup> Data from Pauliina Pussinen (Ministry of Finance), correspondence with the IRM, 14 December 2023.

<sup>131</sup> Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.

<sup>132</sup> Pauliina Pussinen (Ministry of Finance), correspondence with the IRM, 14 December 2023.

<sup>133</sup> Ministry of Finance, Kansalaisjärjestöakatemia, 1 October 2021, [https://avoinhallinto.fi/assets/files/2021/12/Kansalaisjarjestoakatemia\\_koonti.pdf](https://avoinhallinto.fi/assets/files/2021/12/Kansalaisjarjestoakatemia_koonti.pdf)

<sup>134</sup> Ministry of Finance, Kansalaisjärjestöakatemia dialogit 30.3.2022 – Yhteenveto keskusteluista, 19 April 2022, [https://avoinhallinto.fi/assets/files/2022/05/Kansalaisjarjestoakatemia\\_Yhteenveto\\_30032022.pdf](https://avoinhallinto.fi/assets/files/2022/05/Kansalaisjarjestoakatemia_Yhteenveto_30032022.pdf)

<sup>135</sup> Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.

<sup>136</sup> eOppiva, Kansalaisyhteiskunta – mitä julkisen hallinnon tulisi siitä tietää? 2023, <https://www.eoppiva.fi/koulutukset/kansalaisyhteiskunta-mita-julkisen-hallinnon-tulisi-siita-tietaa/>

<sup>137</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 27 November 2023.

<sup>138</sup> Riitta Kittilä (SOSTE), interview by the IRM, 20 December 2023.

<sup>139</sup> Ministry of Finance, NGO Academy, Kansalaisjärjestöakatemia, <https://avoinhallinto.fi/verkostot/kansalaisjarjestoakatemia/>

<sup>140</sup> Open government strategy, <https://avoinhallinto.fi/avoimen-hallinnon-strategia/>

<sup>141</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>142</sup> Yhteenvedot avoimen hallinnon ja sen johtamisen aluekierroksista, 19 October 2020, <https://avoinhallinto.fi/yhteenvedot-avoimen-hallinnon-ja-sen-johtamisen-aluekierroksista/>

<sup>143</sup> Katju Holkeri (Ministry of Finance), interview by the IRM, 21 February 2024.

<sup>144</sup> Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (recast), PE/28/2019/REV/1, <http://data.europa.eu/eli/dir/2019/1024/oj>

<sup>145</sup> Ministry of Finance Finland, Opening up and using public data, <https://vm.fi/en/opening-up-and-using-public-data>

<sup>146</sup> Open Data Maturity Report 2023, Country questionnaire 2023, Finland’s survey response, [https://data.europa.eu/sites/default/files/odm2023\\_country\\_questionnaires.zip](https://data.europa.eu/sites/default/files/odm2023_country_questionnaires.zip); Janne Peltola (Open Knowledge Finland), e-mail communication with the IRM, 21 May 2024.

<sup>147</sup> Janne Peltola (Open Knowledge Finland), e-mail communication with the IRM, 21 May 2024.

<sup>148</sup> Ministry of Finance, Tekoälyn eettinen ohjeistus,

<https://vm.fi/documents/10623/162999475/Tekoälyn+eettinen+ohjeistus+huoneentaulu.pdf/1537d52a-77bc-125d-07c5-601016397adb/Tekoälyn+eettinen+ohjeistus+huoneentaulu.pdf?t=1685087251695>

<sup>149</sup> Open Government Partnership, Finland Action Plan 2023-2027, <https://www.opengovpartnership.org/documents/finland-action-plan-2023-2027/>