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Results Report:
Italy 2021–2023

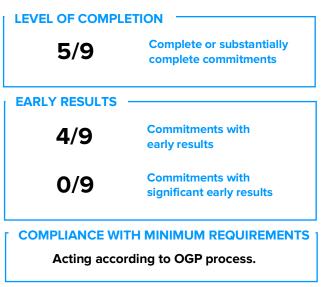Open
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Executive Summary

Italy's fifth action plan made progress opening public spending data on the National Recovery and Resilience Plan and institutionalizing civil society-public administration cooperation on the national anti-corruption framework. Co-creation and participation practices greatly improved compared to previous action plan cycles, with a new Multi Stakeholder Forum.

Early Results

Four out of the 9 commitments in Italy's fifth action plan produced moderate early results – an improvement compared to the previous action plan cycle[1]. No commitments achieved significant early results. Promising commitments identified by the IRM at the design phase generated the strongest results.[2] Commitments 2.01 and 2.02 resulted in cooperation between civil society and public administration on the national anti-corruption framework and delivered capacity building for key officials tasked with preventing corruption. This benefited from political visibility, given Italy's Vice-Presidency of the G20 Anti-Corruption Working Group in 2023. Commitment 5.02 published new and higher-quality datasets on public spending tied to the National Recovery and Resilience Plan (PNRR), forming part of broader institutional actions. In addition, Commitment 1.01 formed an OGP multistakeholder forum.

IMPLEMENTATION AT A GLANCE

LEVEL OF COMPLETION

5/9   **Complete or substantially complete commitments**

EARLY RESULTS

4/9   **Commitments with early results**

0/9   **Commitments with significant early results**

COMPLIANCE WITH MINIMUM REQUIREMENTS

Acting according to OGP process.

Completion

This action plan had a higher implementation rate than the previous action plan.[3] Four commitments (2.01, 2.02, 3.02, and 5.02) achieved full completion and one (1.01) achieved substantial completion—including most commitments the IRM identified as having the potential to realize promising results at the design phase.[4] Contributing factors to implementation were inclusion within broader institutionalized frameworks—such as that of the PNRR—and a positive approach to collaboration between public administration and civil society. The absence of these factors or changes to relevant legislative frameworks affected the degree of completion for the remaining commitments.

Participation and Co-Creation

A dedicated OGP Italy team within the Department of Public Function (DFP) led Italy's OGP process. An OGP Task Force made up of experts on open government supported the process, along with the multistakeholder forum (MSF), which was established in July 2022. The MSF enabled a more structured and institutionally recognized pathway for cooperation between public administration and civil society. Through the MSF, improved governance of the OGP process had a noticeable trickle-down effect on the joint implementation of most commitments.[5] Co-creation and participation saw significant improvement compared to previous cycles. Public administration and civil society met frequently online and in person both during design and implementation of the action plan,[6] with a number of new CSO participants in the process. While

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praising the increased level of interaction, public administration and civil society stakeholders noted to the IRM that intensive workload formed a barrier for the participation of smaller civil society organizations who lack financial and human resources.[7] This can be addressed in future cycles, building on this action plan's progress.

Implementation in Context
Steps taken to ensure close collaboration during co-creation of commitments had a positive effect on action plan implementation.[8] The new MSF ensured a more structured and sustainable approach to participation and co-creation throughout the entire action plan cycle, including for the implementation of most commitments. In some cases, commitment implementation benefited from external factors, like high-level exposure provided by Italy's Vice-Presidency of the G20 Working Group on Anti-Corruption. A new government came into power in 2022, during the action plan period,[9] although this did not significantly affect the completion rate of commitments.[10] Italy demonstrated its commitment to OGP internationally while Co-Chair of the OGP Steering Committee during the implementation period. Public administration and civil society stakeholders indicated that more high-level political support for the domestic process would have been beneficial to advance the open government agenda.[11]

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[1] "IRM Transitional Results Report: Italy 2019–2021," Open Government Partnership, 28 March 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/03/Italy_Transitional-Results-Report_2019-2021_EN.pdf.

[2] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership, 14 October 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/10/Italy_Action-Plan-Review_2021-2023_EN.pdf.

[3] "IRM Transitional Results Report: Italy 2019–2021," Open Government Partnership.

[4] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership.

[5] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy, 29 January 2024, https://open.gov.it/sites/default/files/media/documents/2024-01/20242901-Rapporto autovalutazione finale 5NAP.pdf; Department of Public Function, interview by IRM researcher, 11 January 2024; National School of Administration, interview by IRM researcher, 16 January 2024; Libera, interview by IRM researcher, 19 January 2024; Bank of Italy, interview by IRM researcher, 22 January 2024.

[6] "Italy End-of-Term Self-Assessment 2022–2023," Department of Public Function.

[7] Department of Public Function, interview; Libera, interview.

[8] "Italy End-of-Term Self-Assessment 2022–2023," Department of Public Function; Department of Public Function, interview.

[9] "Meloni Government," Presidency of the Council of Ministers, 22 October 2022, https://www.governo.it/it/i-governi-dal-1943-ad-oggi/governo-meloni/20727.

[10] Department of Public Function, interview.

[11] Department of Public Function, interview; Libera, interview.

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Section I: Key Observations

An analysis of Italy's fifth action plan cycle highlights that conscious efforts have been put into improving and further institutionalizing cooperation between public administration and civil society, with promising results. This action plan cycle showed that there is momentum for open government in Italy, and that co-creation and participation between public administration and civil society is becoming more institutionalized. OGP can be a framework for furthering institutional initiatives and driving the achievement of significant results, and that increased transparency of National Recovery and Resilience Plan funds disbursement remains a priority for civil society.

Observation 1: Co-creation and participation between public administration and civil society is becoming more institutionalized. The degree of co-creation and participation between public administrations (PAs) and civil society organizations (CSOs) saw visible improvement during this action plan cycle, in response to civil society dissatisfaction with previous action plan cycles.[1] This led to a new MSF, with co-designed rules and regulations. Italy's first structured forum for interaction between PAs and CSOs guided the overarching execution of the action plan and created a trickle-down effect on implementation of individual commitments. All commitments which achieved early results counted on close interaction and open exchange between PAs and CSOs. Representatives of both groups involved in these commitments all indicated that consolidated cooperation between the two counterparts was one of the most important outcomes of implementation.[2] The benefits of this way of working have been acknowledged in the action plan's End-of-Term Self-Assessment Report, the websites of involved PAs, and the documents that resulted as outputs of action plan commitments. In some cases, this approach has had a spillover effect in activities beyond the framework of the action plan. For example, CSOs introduced to the National School of Administration (SNA) in the context of Commitment 2.02 are now being invited by the school to participate as contributors in training courses and workshops.[3] Similarly, the informal cooperation established by Commitment 5.02 has, in some instances, led to easier access for CSOs to data retained by PAs.[4].

Given this positive change of pace in Italy, the IRM recommends that efforts are made to continue this momentum. A first step will be the formal approval of the National OGP Strategy, which can be used as an overarching document to anchor the development of future action plans. While the establishment of the MSF is an important achievement, stakeholders should be conscious of the risk of it becoming, in the long term, an inward-looking mechanism, listening only to the voices of forum members without taking into account the perspectives of broader civil society. The inclusion of a two-year mandate rule could mitigate this risk. The IRM also reiterates the recommendation to ensure appropriate conducive mechanisms to foster active involvement of smaller or newer CSOs, enable access for diverse groups, and provide CSOs with the opportunity to set the agenda of MSF meetings. Broader and more active engagement of the OGP Italy Community at large should be encouraged in this sense. The MSF's regulations and performance should also be regularly assessed and revised as needed to ensure that it remains fit for purpose.

Observation 2: OGP can be a framework for furthering institutional initiatives and driving the achievement of early results. Commitment 5.02, on open data for the monitoring of PNRR funds, modeled how OGP can be a framework through which pre-existing institutional initiatives can be furthered by incorporating cooperation with civil society. In terms of institutional framework, PAs are obliged to publish data on the implementation of the PNRR on the ReGiS database.[5] Data

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related to the implementation of the PNRR started being released by administrations on the Italia Domani portal in larger volumes only in the summer of 2023 after a series of formal requests from civil society.[6] The open exchange between civil society and public administration was fundamental to identify valuable datasets for publication as well as drive their release.[7] However, stakeholders warn that limitations remain, including usability for non-experts.[8] As this commitment achieved moderate early results, Italy could go further to use this collaborative approach to achieve more ambitious open government results. During development of the sixth action plan, the MSF and the OGP Italy Community could jointly assess commitment areas where this approach could be applied. As outlined further below, implementation of the PNRR remains one of the key areas to test this method.

Observation 3: Increased transparency of PNRR funds disbursement and involvement in PNRR implementation remains a priority for civil society. This action plan made moderate progress on the transparency of PNNR funds disbursement. Nonetheless, civil society has been vocal on the shortcomings that continue to exist in the implementation of the National Resilience and Recovery Plan. CSOs remark that the datasets published on the Italia Domani portal are sometimes unusable, especially for non-experts.[9] They also note the limited involvement of civil society as a direct interlocutor for the implementation of the PNRR[10] particularly since the March 2023 abolition of the relevant Partnership Working Group (*Tavolo di Partenariato*).[11] In addition, they underline that inability to ensure more transparency on PNRR vulnerabilities to corruption remains a key shortcoming.[12] In line with its growing potential to institutionalize cooperation between PAs and CSOs, OGP could be a framework for furthering CSOs priorities and ensuring more open and accountable spending of PNRR funds. This could be carried forward to the sixth action plan, anchored in the new strategy. Commitments can build on this action plan's results to strengthen resilience to corruption.

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[1] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership, 14 October 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/10/Italy_Action-Plan-Review_2021-2023_EN.pdf.

[2] National Anti-Corruption Authority, interview by IRM researcher, 29 January 2024; Libera, interview by IRM researcher, 19 January 2024; Department of Public Function, interview by IRM researcher, 11 January 2024; National School of Administration, interview by IRM researcher, 16 January 2024; Bank of Italy, interview by IRM researcher, 22 January 2024; Civil society stakeholders, interview by IRM researcher, 4 and 6 March 2024.

[3] National School of Administration, interview.

[4] Civil society stakeholder, interview, 6 March 2024.

[5] "ReGiS database," Italia Domani, https://www.italiadomani.gov.it/it/Interventi/regis---il-sistema-gestionale-unico-del-pnrr.html.

[6] "The PNRR and the lack of data," Open Polis, 1 December 2022, https://www.openpolis.it/il-pnrr-e-la-mancanza-di-dati.

[7] National Anti-Corruption Authority, interview; "Commitment 5.02 – Storytelling document," Unpublished draft shared with the IRM Researcher.

[8] Civil society stakeholder, interview, 6 March 2024.

[9] "Update on ReGiS data," PNRR Datibenecomune, 19 June 2023, https://pnrr.datibenecomune.it/post/aggiornamento-dati-regis; Civil society stakeholder, interview, 6 March 2024.

[10] "Online our report - PNRR Civic Observatory: Civil Society as guide towards a correct new start," Osservatorio Civico PNRR, 12 October 2023, https://www.osservatoriocivicopnrr.it/news/40-e-online-il-rapporto-osservatorio-civico-pnrr-la-societa-civile-come-guida-per-la-giusta-ripresa.html.

[11] "#RepowerEU for a PNRR that is a joint asset: Let's talk about it together," Osservatorio Civico PNRR, 31 May 2023, https://www.osservatoriocivicopnrr.it/news/37-repowereu-per-un-pnrr-bene-comune-parliamone-insieme.html.

[12] Libera, interview.

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Section II: Implementation and Early Results

The following section looks at one cluster of commitments and one commitment that the IRM identified as having the strongest results from implementation. To assess early results, the IRM referred to commitments or clusters identified as promising in the Action Plan Review as a starting point. After verification of completion evidence, the IRM also took into account commitments or clusters that were not determined as promising but that, as implemented, yielded predominantly positive or significant results.

Commitments 2.01 and 2.02: Corruption prevention and culture of integrity
National Anti-Corruption Authority, National School of Administration, Bank of Italy, Consip, Court of Auditors, Ministry of Foreign Affairs, Ministry of Economy and Finance, Ministry of Justice, Ministry of Education, Ministry of Economic Development, Department of Public Function, Department of Cohesion Policies, Liguria Region, Fondazione Etica, Libenter, Libera, Osservatorio Civico PNRR, The Good Lobby, Transparency IT, Re-act.

For a complete description of the commitments included in this cluster, see Commitments 2.01 and 2.02 in Italy's 2022–2023 action plan (original and amended versions): https://www.opengovpartnership.org/documents/italy-action-plan-2021-2023-december.

Context and Objectives
Corruption remains a key area of attention for Italy. At the time of publication of this action plan, Directive 2019/0366/EU on Whistleblowers had yet to be transposed, despite being required by December 2021. The provision of support to whistleblowers, officially provided by only two civil society organizations (Libera and Transparency International), was not a formally recognized service by the national anti-corruption framework, which contributed to limited awareness amongst would-be whistleblowers of the existence of this service. Meanwhile, monitoring reports by the National Anti-Corruption Authority (ANAC) highlighted the need to strengthen the skills of public officials for monitoring, identifying, and addressing corruption risks within PAs; and particularly to strengthening anti-corruption safeguards in the management of PNRR funds by appointing dedicated 'managers' responsible for monitoring interventions financed via the PNRR and submitting Suspicious Transaction Reports (STRs) to the Financial Intelligence Unit (FIU)[1].

This cluster sought to promote greater involvement of civil society in corruption prevention, strengthen the competencies of institutional actors formally tasked with corruption prevention (RPCTs) through dedicated training, and foster the exchange and dissemination of national and international best practices. This was accomplished, inter alia, through the creation of a multistakeholder task force led by ANAC and of a Community of Practice of RPCTs (CdP). Particular attention was placed on promoting approaches to prevent corruption and anti-money laundering throughout the implementation of the PNRR.[2]

Early Results: Moderate
All of the cluster's activities were completely implemented and achieved moderate early results, contributing to further institutionalizing collaboration between PAs and anti-corruption CSOs. The multistakeholder institutional task force led by ANAC was set up in 2022 and had a cross-cutting role on the cluster's activities. The task force had three sub-working groups[3] to facilitate daily operations. ANAC fulfilled its intention[4] to use the task force to coordinate active involvement of civil society in the national anti-corruption strategy. As part of the consultation process preceding

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the adoption of the 2022–2024 National Anti-Corruption action plan (NACAP), the ANAC task force hosted several meetings with CSOs to present the draft plan and collecting inputs.[5] This was a new practice in the drafting process for the National Strategy; creating a dedicated space for more direct interaction between responsible PAs and CSOs. A similar consultation approach was also adopted for the 2023 update to the 2022 NACAP, which focused primarily on the issue of public contracts. One civil society representative highlighted that it was sometimes confusing that ANAC used its own platforms for public consultation rather than the national ParteciPA platform[6].

Under leadership of the National School of Administration (SNA), the CdP was officially launched on 22 June 2022 with the creation of a dedicated platform on the SNA website.[7] By the end of the implementation period, the CdP included 250 members, exceeding its target of 200. Members included RPCTs, policy officers responsible for anti-corruption policies, and STR 'managers'.[8] The CdP was a platform for dialogue and capacity building across this cluster's different themes. The CdP work programme took into account themes of particular importance to RPCTs, collated in a questionnaire before the CdP launch.[9] The CdP met 31 times, touching on topics like whistleblowing, lobbying, and anti-money laundering.[10] All meetings included active involvement of civil society. By Autumn 2023, 87.7% of CdP members felt they had stronger skills in corruption prevention based on a self-assessment questionnaire (exceeding the target of 60%).[11] The strengthening of public officials' skills to monitor, identify, and address corruption risks represented a key need of the RPCT community. However, it is too early to determine how these skills have been put into practice. Currently there is limited interaction between this new and growing community and the forum of RPCTs led by ANAC. An SNA representative indicated that there was interaction with the forum when the community was first launched to attract the RPCTs and assess their needs via the questionnaire.[12]

The CdP took first steps to strengthen anti-corruption safeguards in the management of PNRR funds. A sub-working group involving the managers responsible for submitting STRs to the FIU was set up in December 2022. Members of this sub-working group received a self-assessment questionnaire to gauge the degree of implementation of mandatory anti-money laundering provisions within each PA.[13] Inclusion of STR managers created, for the first time, a joint space for discussion amongst key stakeholders involved in different levels of public authorities' prevention activities.[14] In addition to the thematic events on anti-money laundering and beneficial ownership transparency, a joint assessment was carried out to identify enabling factors that had supported the work of the 23 public authorities that had submitted STRs in the last years. The results were published in a report.[15] An FIU representative highlighted the importance of conducting this first assessment as a way to convene experts beyond the usual anti-money laundering community. The IRM notes the importance of continuing to leverage the CdP to design and deploy training activities as is intended in Spring 2024.[16]

The cluster's strongest results were related to whistleblowers. The cluster led to a series of joint exchanges between CSOs and PAs on the transposition of Article 18 of Directive 1937/2019,[17] due by December 2022. Interviewed civil society representatives indicated that they were positively surprised by the intensity of exchanges and openness to CSOs' legislative suggestions.[18] In October 2022, a document collecting CSO input was formally presented to the Technical Working Group on the transposition of the Directive.[19] Civil society representatives considered the direct reference of Article 18 to the availability of a list of CSOs providing support to potential whistleblowers on the ANAC website[20] to be a positive result of their input through the OGP platform. The list includes 10 supporting organizations that have signed a formal convention with ANAC between 2023 and 2024.[21] Publication of the list also responds to IRM recommendations.

However, civil society representatives were not fully satisfied by the way their input was considered in the formulation of Article 18[22] of the transposed directive. They also voiced concerns on the limited transparency and involvement of external stakeholders in the process for the transposition of the directive as a whole.[23]

The theme of whistleblowing was given particular attention by the CdP, with 14 meetings, webinars, and workshops focused on strengthening the skills of RPCTs who manage reports and on raising public officials' broader awareness of whistleblowing.[24] A manual was published in December 2023 to support and guide RPCTs and whistleblowers.[25] As a result of the exchanges between RPCTs, CSOs, and PAs, three good practices related to whistleblowing were also promoted on the CdP website: the importance of adopting a new narrative on whistleblowing to place the whistleblower as a person at the center, the importance of making the support role of CSOs more visible and accessible, and a proposal to amend Article 8 of the Code of Conduct of public officials to align it to the current legislative framework on whistleblowing.[26] Four public authorities have already taken up the good practice on increasing the visibility of CSOs by providing a direct link to their website.[27]

While the design of the action plan did not initially list target indicators to measure achievement of the cluster,[28] these were later added as part of the overall monitoring of implementation. Targets for all activities were met and often surpassed, for instance including a larger number of CdP members and strengthening a higher percentage of the members' skills than targeted.[29] However, the IRM notes that an important topic tied to this cluster—reinforcing the monitoring of PNRR spending—received limited attention beyond a few CdP seminars and publication of a risk catalogue.[30] This was also identified as a weakness by civil society stakeholders who indicated this as a lack of political engagement.[31]

Overall, the work of the CdP exceeded expectations. Stakeholders highlighted that it paved the way for a more structured and accepted approach to cooperation between PAs and CSOs. An SNA representative observed that this was the first time such open cooperation existed, and that it led to a series of unplanned activities involving CSOs that would have previously been unthinkable.[32] The CdP was included in the compendium of good practices on public participation promoted by the G20 Anti-corruption working group[33] and in the OECD's "Shaping the values for a sustainable future: Education for the fight against corruption" manual.[34] The good practices identified on whistleblowing were presented at several international forums.[35] The SNA representative indicated that these achievements would not have been possible without the OGP framework.[36] In the future, this cooperation could produce greater open government results, depending on the extent of uptake of CSOs' input by relevant government actors.

Looking Ahead
Stakeholders of both PAs and CSOs expressed strong interest in continuing the work carried out within this cluster beyond the fifth action plan, both by carrying forward activities in the sixth action plan and independent of the OGP framework.[37] For example, the CdP sub-working group dedicated to whistleblowing will continue its capacity building work by becoming an Advisory Board to the CdP.[38] This continuity will contribute to the sustainability of the results achieved. As cultural resistance of civil servants to implement integrity measures may be a challenge,[39] SNA intends to continue capacity building work by designing and delivering trainings on the culture of integrity via a bottom-up approach with schools and higher education institutions.[40]

Looking ahead, the IRM recommends using the sixth action plan to carry forward this clusters' efforts, advising in particular to focus on identifying and finding ways to address ongoing

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challenges and obstacles to strengthening corruption prevention. The platforms and connections enabled by this cluster can be leveraged to enhance coordination and synergies amongst both individuals and institutions within PAs and CSOs, with a view to advancing the effectiveness of anti-corruption efforts. Emphasis should be placed on equipping institutions with problem-solving, learning, and adaptation skills, continuing the work started with the CdP. The IRM further advises ensuring that the important by-products of this cluster—manuals, risk catalogues, guidelines—are appropriately disseminated amongst the respective target groups and accompanied by formal training to enhance uptake.

Commitment 5.02: Open standards for participation of civil society in public spending
National Anti-Corruption Authority, Associazione OnData, Associazione, Monithon, Cittadinanzattiva, Fondazione Etica, Osservatorio Civico PNRR, Parliament Watch Italia, Transparency International Italia.

For a complete description, see Commitment 5.02 in Italy's 2022–2023 action plan (original and amended versions): https://www.opengovpartnership.org/documents/italy-action-plan-2021-2023-december.

Context and Objectives
This commitment, led by the National Anti-Corruption Authority (ANAC), sought to promote the inclusion of civil society actors in the monitoring of public spending and facilitate access to information available in the National Database of Public Contracts (BDNC) by providing a free access portal, dashboards for an independent analysis of published data, datasets in RDF open format, and by adopting the OCDS standard for the data provided. ANAC intended to be in charge of publishing datasets related to the publication phase of the call for tenders, the awarding phase, and the final phase of contracts for all contracts worth more than EUR 40,000. This would partly, but not exclusively, include contracts funded under the PNRR. The adoption of the OCDS standard, a recognized best practice at international level and the only international open standard for the publication of information on all stages of public contracts, has been on the agenda of the Italian government since 2016, and was also included in some of the efforts implemented within the framework of previous Open Government action plans.

Early Results: Moderate
All activities in the commitment were completely implemented with strong collaboration between PAs and CSOs. Implementers saw civil society input as key in steering the course of action in several cases.[41] This collaboration enabled the achievement of moderate early results, ensuring not only that new data was available but also that it was of high quality, accessible, and that multiple sources of data could be accessed from the same platform. However, the degree to which non-expert citizens could make use of the open data available remained limited.

In April 2022, ANAC published its datasets in OCDS format and launched a Datathon to identify ways to reuse the data of the BDNAP, as planned.[42] On the OpenCUP portal,[43] dataset on public investment projects were released with a 'PNRR tag',[44] when applicable, to facilitate the identification of PNRR-related contracts within the larger OpenCUP database.[45] The inclusion of the 'PNRR tag' was made at the request of civil society, following exchanges held in this commitment's working group. In April 2023, ANAC released a new dataset including data of tenders published by the Contracting Authorities that declare that they use PNRR/PNC[46] funds and comply with the planned equal opportunity/gender equity hiring quotas.[47] In this regard, the activity of CSOs that aimed to monitor specific aspects of the PNRR, such as its impact on gender

equality, was also facilitated thanks to the open interaction between CSOs and PAs, which resulted in its inclusion in the datasets released by ANAC. In line with the commitment's objectives, ANAC also published the Application Programming Interface (API)[48] needed to query the contents of public tenders starting from the Procurement Identification Code (CIG).[49][50] Lastly, additional datasets released included the publication of data dedicated to the implementation of PNRR funds towards the digitalization of PAs by the Department of Economic Policy Planning and Coordination (DIPE).[51]

The Action Plan Review had highlighted that the main possible challenges and obstacles to the successful implementation of this commitment were tied to the ability of both PA implementers as well as end users to make appropriate use of the data published in OCDS format. Poor awareness and understanding of the potential of open data, both among non-subject matter experts in civil society as well as at decision-making level, remains one of the key issues in Italy's open data landscape.[52] An ANAC representative confirmed that one of the main outputs of this commitment, in addition to the publication of new datasets, was the co-creation under the leadership of the CSO OnData of a practical *vademecum* on how to use open data, offering concrete examples.[53] The *vademecum* consists of a dedicated website, which includes a space for posting suggestions and recommendations on how to expand the document but also to ask practical questions on how to interpret data. The *vademecum* supports civic monitoring of the PNRR funds by presenting the available datasets in a single space since 2022 and integrating them to the extent possible. In addition to the creation of this joint space, it provides an overview of the different organisations and initiatives working on making PNRR open data accessible.[54]

The *vademecum* is a unique tool in the Italian landscape, representing the most comprehensive mapping of open data sources available for civic monitoring of PNRR funds.[55] The website is regularly updated to reflect the state-of-the-art of available data, in line with datasets formally released by the Italia Domani portal.[56] While highlighting the importance of this new tool, civil society stakeholders underlined that it remains a tool primarily targeted towards—and therefore used by—expert users. This means that usability for wider civil society and citizens remains limited.[57] More accessible tools and platforms would be needed to support wider uptake of open data for effective monitoring of public resources.[58]

The ANAC representative indicated that access statistics show that the *vademecum* is currently being frequently accessed and that it is being disseminated at the regional and local levels with the support of the OGP Task Force.[59] Pilot initiatives bringing together the results of this commitment were launched with regional PNRR data in Tuscany, Liguria, and Puglia. Other entities also invested in developing operational guidelines on the use of open data, such as the BNDP's operations manual and the DIPE's guidelines on the monitoring of PNRR.[60][61]

The ANAC representative praised the degree of open debate and partnership between CSOs and PAs, indicating that participation to the commitment had expanded on both sides as implementation progressed and that the approach had soon become one of co-creation.[62] This was corroborated by a storytelling document currently being finalized by the commitment's working group.[63] Civil society stakeholders highlighted this way of working as one of the main outcomes of the commitment.[64] The IRM notes that these are important steps forward. It also notes that there remains a key challenge in the ability of citizens and PA users to make appropriate use of the published data.[65] To ensure the achievement of significant results, it will be important to work on overcoming existing skills gaps through awareness raising and targeted trainings, as well as the introduction of more user-friendly tools for non-experts.

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Looking Ahead

This commitment made positive progress both to expand the available datasets and to make existing ones more accessible by linking different databases where possible. In the last few months of implementation, the commitment's working group expanded to include the Ministry of Economy and Finance and the Department for Cohesion Policies, two critical actors in the field of PNRR data,[66] who expressed interest in building on this work in the next action plan.

Looking ahead, the IRM recommends the involvement of all actors whose datasets feed into the ReGiS database to ensure an enhanced quality of available data as well as continuation of co-creation and capacity building activities with smaller actors at the municipal and regional levels in line with the pilot activities carried out under this commitment. To the extent possible, synergies with the anti-corruption and anti-money laundering communities can also be leveraged by organizing joint trainings and workshops involving PAs and CSOs, including via the CdP, to ensure that civic monitoring of PNRR spending through open data can also contribute to institutional efforts in this field.

[1] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership, 14 October 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/10/Italy_Action-Plan-Review_2021-2023_EN.pdf.

[2] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership.

[3] The three sub-working groups focus on: (1) Anti-corruption strategies and synergies with PNRR anti-fraud verification mechanisms; (2) Whistleblowers support activities; and (3) Best practices at the international level.

[4] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership.

[5] "Second interim monitoring report, Italy action plan 2022-2023," OGP Italy, December 2022, https://open.gov.it/sites/default/files/media/documents/2022-12/II REPORT VALUTAZIONE 5NAP_FINALE.pdf.

[6] Libera, interview by IRM researcher, 19 January 2024.

[7] "Community of Practice of RPCTs," National School of Administration, https://sna.gov.it/home/attivita/comunita-di-pratica/comunita-di-pratica-per-rpct/

[8] Prior to commitment implementation, the CdP had 76 members. See Commitment 2.02 on "Monitoring," OGP Italy, https://open.gov.it/governo-aperto/piano-nazionale/5nap/monitoraggio.

[9] "Online questionnaire for baseline assessment," CdP, Shared with IRM researcher; "Questionnaire results," CdP, https://docs.google.com/presentation/d/1JkakCA7CF-9FsK72mw-P-xDVutUMIhGt/edit?usp=sharing&ouid=109945145000406044952&rtpof=true&sd=true.

[10] These included twelve meetings and two operational workshops on the theme of whistleblowers, five meetings on the topic of competences for integrity, four meetings on conflict of interests and roles and relationship of public figures, two meetings on transparency of beneficial ownership, one meeting on the participatory approach to defining the administration Integrated plan of activities and organization (PIAO), three meetings on lobbying and open agendas, one meeting on confiscated assets, and one meeting on digitalization and transparency in the fight against corruption. See "Activities – Community of Practice of RPCTs," National School of Administration, https://sna.gov.it/home/attivita/comunita-di-pratica/comunita-di-pratica-per-rpct/attivita-comunita-di-pratica-rpct/.

[11] "Monitoring," OGP Italy.

[12] National School of Administration, email correspondence with IRM researcher, 23 February 2023.

[13] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy, 29 January 2024, https://open.gov.it/sites/default/files/media/documents/2024-01/20242901-Rapporto autovalutazione finale 5NAP.pdf.

[14] Bank of Italy, interview by IRM researcher, 22 January 2024.

[15] "Anti-Money laundering duties of public administrations: An empirical assessment of enabling factors within the Community of Practice of RPCTs," National School of Administration, https://sna.gov.it/home/attivita/comunita-di-pratica/comunita-di-pratica-per-rpct/buone-pratiche/doveri-antiriciclaggio-della-pubblica-amministrazione/

[16] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[17] "Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law," European Parliament, 23 October 2019, https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32019L1937.

[18] Libera, interview.

[19] "Second interim monitoring report, Italy action plan 2022-2023," OGP Italy.

[20] "Whistleblowing," National Anti-Corruption Authority, https://www.anticorruzione.it/-/whistleblowing.

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[21] At the time of writing of the action plan, only Libera and Transparency International were offering this service.

[22] Article 18 focuses on the role of civil society in supporting whistleblowers.

[23] "EU Directive on Whistleblowing – 30 days to go and still no news," The Good Lobby, https://www.thegoodlobby.it/comunicato-stampa/direttiva-ue-sul-whistleblowing-30-giorni-al-termine-per-la-trasposizione-e-ancora-tutto-tace.

[24] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[25] "Whistleblowing and Culture of Integrity: Food for thought from public institutions and civil society towards a new narrative," National School of Administration, https://sna.gov.it/home/attivita/comunita-di-pratica/comunita-di-pratica-per-rpct/buone-pratiche/whistleblowing-buone-pratiche/.

[26] "Good Practices – Community of Practice of RPCTs," National School of Administration, https://sna.gov.it/home/attivita/comunita-di-pratica/comunita-di-pratica-per-rpct/buone-pratiche/.

[27] "Dettaglio Trasparenza," Municipality of Pistoia, https://pistoia.trasparenza-valutazione-merito.it/web/trasparenzaj/dettaglio-trasparenza; "Segnalazione illeciti – whistleblowing," the Liguria Region, https://www.regione.liguria.it/homepage-amministrazione-trasparente/amministrazione-trasparente-2022/altri-contenuti/corruzione/segnalazione-illeciti-whistleblowing.html; "Impresa, Innovazione e Marketing Territoriale," Trentino Sviluppo, https://trentinosviluppo.it/Home.aspx; "Whistleblowing," National Institute for Nuclear Safety and Radioprotection, https://www.isinucleare.it/it/amministrazione-trasparente/altri-contenuti/whistleblowing.

[28] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership.

[29] "Monitoring," OGP Italy.

[30] "PNRR Corruption Risks Catalogue," National Anti-Corruption Authority, https://docs.google.com/document/d/1qJS7iWtS-B26dfHlvC6MY1g-mvNAX_8f/edit.

[31] Libera, interview.

[32] National School of Administration, interview by IRM researcher, 16 January 2024.

[33] "G20 Indonesia 2022: Compendium of Good Practices on Public Participation and Anti-Corruption Education," United Nations Office on Drugs and Crime, https://www.unodc.org/documents/corruption/G20-Anti-Corruption-Resources/Thematic-Areas/Public-Sector-Integrity-and-Transparency/2022_G20_Compendium_of_Good_Practices_on_Public_Participation_and_Anti_Corruption_Education_adopted.pdf.

[34] "Shaping the values for a sustainable future: Education for the fight against corruption," Business at OECD, https://www.businessatoecd.org/hubfs/Shaping%20the%20values%20for%20a%20sustainable%20future%20-%20Education%20for%20the%20fight%20against%20corruption.pdf?hsLang=en.

[35] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy; White Collar Crime Conference, hosted by the University of Derby, Università Cattolica del Sacro Cuore, and the London Centre for Commercial and Financial Law, 12 December 2023.

[36] National School of Administration, interview.

[37] National School of Administration, interview; Libera, interview.

[38] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[39] "Shaping the values for a sustainable future: Education for the fight against corruption," Business at OECD.

[40] National School of Administration, interview.

[41] National Anti-Corruption Authority, interview by IRM researcher, 29 January 2024; "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[42] "Datasets in OCDS format," National Anti-Corruption Authority, https://dati.anticorruzione.it/opendata/ocds.

[43] The OpenCUP portal was launched in January 2016 and contains information on individual public works projects that are linked by their unique identification number (CUP). This allows citizens to track spending on specific projects. Any transaction (public works, contracting, service agreements) using public money must be assigned a CUP code. See "IRM Design Report: Italy 2019–2021," Open Government Partnership, November 2020, https://www.opengovpartnership.org/wp-content/uploads/2020/11/Italy_Design-Report_2019-2021_EN.pdf.

[44] "New PNRR OpenCUP dataset now online," Department for Economic Policy Programming and Coordination, https://www.opencup.gov.it/portale/web/opencup/home/-/asset_publisher/a5SG2OwzRtgy/content/online-il-nuovo-dataset-pnrr?_com_liferay_asset_publisher_web_portlet_AssetPublisherPortlet_INSTANCE_a5SG2OwzRtgy_assetEntryId=250531&_com_liferay_asset_publisher_web_portlet_AssetPublisherPortlet_INSTANCE_a5SG2OwzRtgy_redirect=https%3A%2F%2Fwww.opencup.gov.it%2Fportale%2Fweb%2Fopencup%2Fhome%3Fp_p_id%3Dcom_liferay_asset_publisher_web_portlet_AssetPublisherPortlet_INSTANCE_a5SG2OwzRtgy%26p_p_lifecycle%3D0%26p_p_state%3Dnormal%26p_p_mode%3Dview%26_com_liferay_asset_publisher_web_portlet_AssetPublisherPortlet_INSTANCE_a5SG2OwzRtgy_cur%3D0%26p_r_p_resetCur%3Dfalse%26_com_liferay_asset_publisher_web_portlet_AssetPublisherPortlet_INSTANCE_a5SG2OwzRtgy_assetEntryId%3D250531

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[45] "Commitment 5.02 – Storytelling document," OGP Italy, unpublished draft shared with the IRM Researcher.

[46] Additional EUR 30 million were pooled to expand the PNRR funds. See: "Piano Nazionale Complementare," [Complementary National Plan], Italia Domani, https://www.italiadomani.gov.it/it/il-piano/Risorse/piano-complementare/piano-nazionale-complementare.html.

[47] "PNRR/PNC datasets," National Anti-Corruption Authority, https://dati.anticorruzione.it/opendata/dataset/indicatori-pnrrpnc; "Gender and youth inclusion in PNRR funds datasets," National Anti-Corruption Authority, https://dati.anticorruzione.it/opendata/dataset/misurepremiali-pnrrpnc.

[48] Application Programming Interface are open software interfaces that allow machine-to-machine interaction.

[49] *Codice Identificativo Gara* (Procurement Identification Code) is a 10-digit code used to identify contracts signed following a public tender.

[50] "API query string," National Anti-Corruption Authority, https://api.anticorruzione.it/apicig/1.0.0/getSmartCig/numero_cig.

[51] "Open data," PA Digitale 2026, https://padigitale2026.gov.it/opendata.

[52] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership.

[53] National Anti-Corruption Authority, interview; "PNRR open data vademecum," OnData, https://pnrr.datibenecomune.it.

[54] These include the datibenecomune (https://www.datibenecomune.it) project, the Osservatorio Civico PNRR (https://osservatoriocivicopnrr.it) and its schools for civic monitoring, and the rete della società civile per il monitoraggio del PNRR (https://pnrr.datibenecomune.it/rete-pnrr.html), a network which fosters exchanges of projects and initiatives on this topic.

[55] "Commitment 5.02 – Storytelling document," OGP Italy.

[56] ReGiS is the unique register through which Italian PAs are required to fulfill their obligations to monitor, report, and control the measures and projects funded by the PNRR. Drawing from the ReGiS database, open data on the PNRR are published on the PNRR National Website. See "Italia Domani"."ReGiS – the unique management system for the PNRR," Italia Domani, https://www.italiadomani.gov.it/it/Interventi/regis---il-sistema-gestionale-unico-del-pnrr.html.

[57] Civil society stakeholder, interview by IRM researcher, 6 March 2024.

[58] Civil society stakeholder, interview, 6 March 2024.

[59] National Anti-Corruption Authority, interview.

[60] National Database of Public Contracts: Operative Manual for Open Data Management," National Anti-Corruption Authority, September 2023, https://dati.anticorruzione.it/opendata/download/ManualeGestioneOperativa-OD.pdf.

[61] "Guidelines for the implementation of activities related to the monitoring of the PNRR," Ministry of Economy and Finance, 14 June 2022, https://www.rgs.mef.gov.it/_Documenti/VERSIONE-I/CIRCOLARI/2022/27/Linee-Guida-per-il-Monitoraggio-del-PNRR.pdf.

[62] National Anti-Corruption Authority, interview.

[63] "Commitment 5.02 – Storytelling document," OGP Italy.

[64] Civil society stakeholder, interview, 6 March 2024.

[65] National Anti-Corruption Authority, interview; Civil society stakeholder, interview by IRM researcher, 4 March 2024.

[66] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

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Section III. Participation and Co-Creation

The quality of engagement between public administration and civil society progressively improved over the action plan cycle, demonstrating a change in approach compared to previous action plans. A multistakeholder forum was established, civil society and public administration met more frequently, and communication on action plan progress was more transparent. Representatives of civil society and public administration highlighted that these improvements fostered open and effective exchanges at operational and strategic levels.

In Italy, the OGP process is led by a dedicated OGP Italy team within the Department of Public Function (DFP). The team is flanked by the OGP Task Force, a government body made up of experts on open government and, as of July 2022, by the multistakeholder forum (MSF).

Public administration and civil society met frequently throughout co-creation and implementation. A total of 53 civil society organizations (CSOs) and 57 public administrations (PAs) met during co-creation between July 2021 and February 2022 to define the commitments for inclusion in the action plan.[1] Final selection of commitments aligned with civil society priorities and requests during the co-creation process.[2] Frequent meetings continued to take place both at commitment level[3] and governance level[4] throughout action plan implementation. Several interviewees from PAs and CSOs indicated that their respective commitments' implementing teams established online group chats, which contributed to strengthening cooperation.[5] Stakeholders saw the increased meeting frequency and option for remote participation as positive progress.[6]

Although interviewees from public administration and civil society felt that cooperation at the operational level was satisfactory, they also identified opportunities for improvement. They highlighted the need for more high-level political participation and vocal support for OGP. They observed that the intensive workload was a participation barrier for smaller organizations with fewer financial and human resources.[7] They noted that the opportunity for CSOs to set the agenda and steer meetings also remained limited,[8] with some stakeholders indicating that remote meetings had an impact on the degree of exchange and interaction between participants.[9]

A DFP representative indicated the need for greater financial resources to support OGP work, particularly as the process becomes more structured and institutionalized.[10] Compared to previous years, they highlighted that there had been a minor improvement, such as CSO members being able to reimburse expenses incurred to attend MSF meetings.[11] However, this was not considered sustainable and the OGP Italy team continued exploring possibilities for additional funds to support the OGP work.

The new MSF was established as part of Commitment 1.01 and became operational in July 2022. The remit and governance structure of the MSF were enshrined in the MSF Regulations[12] and were developed by PAs and CSOs jointly under the leadership of Orizzonti Politici and the Good Lobby; and the Conference of the Regions and Autonomous Provinces, the DFP, and the Ministry of Ecologic Transition. The draft regulations were opened for public consultation on the ParteciPA platform from May to June 2022, primarily targeting members of the OGP Italy Community (see below), after which they were formally adopted and published on the national OGP website. The MSF has a maximum mandate of two years, in line with the action plan duration, and is expected to meet on a bimonthly basis, reporting quarterly to the OGP Italy

community in plenary meetings. The MSF met eight times during implementation of the fifth action plan. Minutes of all meetings are available online.[13]

The MSF composition centered on equality between PAs and CSOs, with 11 representatives each. As per the MSF Regulations, prospective members filled out an online application form, available on the national OGP website, and needed to meet several pre-requisites, including having been part of the OGP community—in its broader sense—for at least one year prior to the application.[14] Stakeholders noted that this resulted in a strict approach that excluded certain groups from participating (such as youth organizations, see Commitment 4.02).[15] The MSF membership is publicly available on the national OGP website. Members were not remunerated. The DFP and OGP Italy team facilitated the MSF work without taking active part in the forum, ensuring transparency by maintaining an active repository with regular progress reporting to the public.[16] Looking ahead, it will be important to ensure that the role of these actors remains that of facilitators only, and that the agendas, structures, and schedules of the meeting remain in the hands of the MSF.

Compared to previous action plans, the MSF enabled a more structured and institutionally recognized method of cooperation between PAs and CSOs. This improvement at the governance level had a visible trickle-down effect on the way most commitments were co-implemented. Engagement with civil society in this action plan cycle was present beyond the MSF as well, albeit in a less evident and structured manner.

With establishment of the MSF, the former Italian Open Government Forum[17] was converted into the Italy OGP Community, comprised of representatives of PAs, CSOs, universities, and others meant to participate in the design, implementation, and monitoring of action plans. As of March 2024, 69 organizations had joined the OGP Italy Community.[18] Individuals or organizations interested in becoming part of the community can fill out an online form on the national OGP website. The action plan's documents were systematically shared for public consultation, although stakeholders interviewed by the IRM noted that responses received were often limited and not particularly pertinent.[19] An MSF representative reported that they hoped for more structured and sustained involvement of the community in future action plan cycles.[20]

Overall, there is clear evidence that the level of dialogue and joint decision-making between PAs and CSOs strongly improved compared to previous action plans, both in the co-creation and implementation phases. Looking ahead, some key issues to address include removing barriers to participation for smaller CSOs, ensuring CSOs are able to steer the agenda of MSF meetings, engaging more diverse groups (e.g., youth organisations, even with limited experience in OGP), and enhancing high-level political engagement to drive forward the implementation of transformative commitments.

Compliance with the Minimum Requirements
The IRM assesses whether member countries met the minimum requirements under OGP Participation and Co-Creation Standards for the purposes of procedural review.[21] During co-creation, Italy 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, but standard is not met)

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- Red= No evidence of action

Acted according to OGP process during the implementation period?	
The government maintained an OGP repository that is online, updated at least once during the action plan cycle, and contains evidence of development and implementation of the action plan. A national OGP website was maintained online and regularly updated with the status of commitment implementation.[22] An interactive dashboard showcasing progress was available for each commitment,[23] and three-monthly progress reports were published on the website.[24]	Green
The government provided the public with information on the action plan during the implementation period. The national OGP website was regularly updated with information on the status of commitment implementation.[25] An interactive dashboard showcasing progress was available for each commitment, and three-monthly progress reports were published on the website.[26] Excluding the Self-Assessment Report published in February 2024,[27] five intermediate assessment reports were released on the national website during the implementation period.[28]	Green

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[1] Four meetings, one online plenary session, five webinars, and one thematic workshop were organized by the OGP Task Force during this period.

[2] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership, 14 October 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/10/Italy_Action-Plan-Review_2021-2023_EN.pdf.

[3] Over the course of the implementation period, stakeholders met 11 times (Commitment 1.01), 17 times (2.01), 15 times (2.02), 21 times (3.01), 23 times (3.02), 16 times (4.01 and 4.02), 8 times (5.01), and 21 times (5.02). See "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy, 29 January 2024, https://open.gov.it/sites/default/files/media/documents/2024-01/20242901-Rapporto autovalutazione finale 5NAP.pdf.

[4] Since its establishment, the MSF met on a bimonthly schedule, whereas plenary meetings took place quarterly.

[5] National Anti-Corruption Authority, interview by IRM researcher, 29 January 2024; Multistakeholder forum representative, interview by IRM researcher, 16 January 2024; Department of Public Function, interview by IRM researcher, 11 January 2024.

[6] Libera, interview by IRM researcher, 19 January 2024; Department of Public Function, interview.

[7] Libera, interview; Department of Public Function, interview.

[8] Civil society stakeholders, interviews by IRM researcher, 19 January and 4 March 2024.

[9] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[10] Department of Public Function, interview.

[11] Department of Public Function, interview.

[12] "MSF Regulations," OGP Italy, July 2022, https://open.gov.it/sites/default/files/media/documents/2022-07/Regolamento%20FMS.pdf.

[13] "MSF Regulations," OGP Italy.

[14] Alternative, potential members could meet this requirement by attending the equivalent number of OGP meetings.

[15] Department of Public Function, interview; Multistakeholder Forum representative, interview.

[16] Department of Public Function, interview; Multistakeholder Forum representative, interview.

[17] The Open Government Forum was the civil society forum that engaged with the OGP process up until the design of the fifth action plan.

[18] "OGP Community," OGP Italy, https://open.gov.it/partecipa/community-ogp-italia.

[19] Department of Public Function, interview; multistakeholder forum representative, interview.

[20] Civil society multistakeholder forum member, interview by IRM researcher, 4 March 2024.

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[21] 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.

[22] "OGP Italy National Website," OGP Italy, https://open.gov.it.

[23] "Monitoring," OGP Italy, https://open.gov.it/governo-aperto/piano-nazionale/5nap/monitoraggio.

[24] "Monitoring," OGP Italy.

[25] "OGP Italy National Website," OGP Italy.

[26] "OGP Italy National Website," OGP Italy.

[27] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[28] "Monitoring," OGP Italy.

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.[1]

In 2022, OGP launched a consultation process to co-create a new strategy for 2023–2028.[2] The IRM will revisit its products, process, and indicators once the strategy co-creation is complete. Until then, Results Reports continue to assess the same indicators as previous IRM reports:

Completion
The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the action plan Review.[3] The level of completion for all commitments is assessed as one of the following:
- *No Evidence Available*
- *Not Started*
- *Limited*
- *Substantial*
- *Complete*

Early Results
The IRM assesses the level of results achieved from the implementation of commitments or clusters that have a clear open government lens, have a high level of completion, or show evidence of achieving early results (as defined below). It considers the expected aim of the commitment or cluster prior to its implementation, the specific country context in which the commitment or cluster was implemented, the specific policy area, and the changes reported. For commitments that are clustered, the level of results is typically assessed at the cluster level, rather than the individual commitment level.

The Action Plan Review for Italy's 2021–2023 Action Plan clustered Commitment 1.01, milestones 1 and 2 of Commitment 4.01, and Commitment 4.02 in Cluster 1 on governance and strategy for open government. In terms of design, the commitments' shared overlapping milestones on gender equality and youth representation on Italy's OGP Multi Stakeholder Forum. However, implementation of these commitments varied widely, and their shared milestones saw limited progress. As such, this Results Report does not assess these commitments as a cluster and conducts the assessment of early results at the individual level, rather than the cluster level.

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:

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- o improving practices, policies or institutions governing a policy area or within the public sector, or
- o 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:
  - o improving practices, policies or institutions governing a policy area or within the public sector, or
  - o 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:
  - o improving practices, policies or institutions governing a policy area or within the public sector, or
  - o 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 Federica Genna (Fondazione SAFE) and was reviewed by Brendan Halloran, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM's International Experts Panel (IEP). The current IEP membership includes:

- Snjezana Bokulic
- Maha Jweied
- Rocio Moreno Lopez

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual[4] and in Italy's action plan Review 2022-2023. For more information, refer to the "IRM Overview" section of the OGP website.[5] A glossary on IRM and OGP terms is available on the OGP website.[6]

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[1] "OGP Repository," Government of Italy, accessed 26 February 2024, https://open.gov.it.
[2] "Creating OGP's Future Together: Strategic Planning 2023–2028," Open Government Partnership, https://www.opengovpartnership.org/creating-ogps-future-together.
[3] The IRM clusters commitments that share a common policy objective during the action plan Review process. In these instances, the IRM assesses "potential for results" and "early results" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology and IRM Indicators of the Action Plan Review.
[4] "IRM Procedures Manual, v3," Open Government Partnership, 16 September 2017, https://www.opengovpartnership.org/documents/irm-procedures-manual.
[5] "IRM Overview," Open Government Partnership, https://www.opengovpartnership.org/irm-guidance-overview.
[6] "OGP Glossary," Open Government Partnership, https://www.opengovpartnership.org/glossary.

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Annex I. Commitment Data[1]

Commitment 1.01: Multistakeholder forum and open government national strategy	
• **Verifiable:** Yes • **Does it have an open government lens?** Yes • This commitment has been clustered as: Cluster 1 – Governance and strategy for open government (Commitment 1.01, Milestones 1 and 2 of Commitment 4.01, and Commitment 4.02) • **Potential for results:** Modest	• **Completion:** Substantial • **Early results:** Moderate

This commitment sought to establish a multistakeholder forum (MSF) to steer the definition of OGP national action plans and the National Strategy for Open Government. Along with Commitments 4.01 and 4.02, it included a specific focus on ensuring representation and fostering opportunities for dialogue with women and youth. The inclusion of this commitment in the action plan stemmed from the priorities of CSOs who had voiced the need for a more structured forum for exchanges between PAs and CSOs both in the design and implementation of action plans.

The MSF became operational in July 2022. Its remit and governance structure, enshrined in the MSF Regulations, were developed jointly by CSOs and PAs.[2] Draft Regulations were published on the ParteciPA public consultation platform from 16 May 2022 to 15 June 2022.[3] Once the consultation period concluded, the regulations were formally adopted and published on the national OGP website.[4] The MSF is composed of 11 representatives of each side, with an elected spokesperson each. Participation is voluntary and is not remunerated. A stakeholder indicated that the size of the MSF, combined with the agreed-upon rule of decision-making by unanimity, sometimes made its work challenging.[5] Sub-working groups were established to address this. A revision of the regulations, specifically the unanimity rule, is also expected to be introduced in the following action plan cycle.[6]

The MSF has a mandate of maximum two years, in line with the duration of national action plans, and is expected to meet on a bimonthly basis[7] and report on a quarterly schedule to the OGP Italy Community during its plenary meetings. Meetings are convened by the Public Administration Department at the initiative of a PA or CSO spokesperson. The list of MSF members is publicly available on the national OGP website.[8] Since its establishment, the MSF met eight times during the implementation of the fifth action plan and once following its completion in January 2024. Minutes of all meetings are available online[9] and regular reporting on the MSF work was provided in the five interim reports used to monitor overall progress of action plan implementation.[10] Civil society stakeholders noted while the increased frequency of meeting was welcome, the intensive workload represented a barrier for participation towards smaller CSOs with less resources. To partially address this issue, the Public Administration Department covered relevant travel expenses for CSOs based outside Rome.[11] Civil society stakeholders also regretted that the opportunity for CSOs to set meeting agendas remained limited and that the approach was often too burdensome and bureaucratic, reflecting similarities with the way PAs work rather than a new joint way of working with civil society.

The draft National Strategy for Open Government was developed by members of the MSF and presented during the plenary meeting of the OGP Italy Community on 29 September 2023. It was placed on public consultation on the ParteciPA platform between 13 October and 12 November 2023.[12] Members of the OGP Italy Community were directly invited via email (300 addresses contacted) to fill out a 15-question questionnaire with the goal of gathering suggestions on the main priorities and objectives of the strategy. Twenty-nine responses were received, the vast majority of which belonging to respondents who form part of the OGP Italy Community (more than 80%) and experts in the field of participation, inclusive digital transformation, and anti-corruption (more than 60%).[13] One stakeholder highlighted the cumbersome process required to participate in the consultation process, which requests users to log into the ParteciPA platform via their electronic ID number (SPID), as one of the factors that hindered a higher engagement rate.[14] Results of the public consultation indicated alignment between the values and priorities presented in the draft strategy and provided additional indications on possible objectives to support the achievement of these priorities.[15] Furthermore, an MSF representative said the development of the strategy could have benefited from broader involvement of civil society in its early stages.[16] Stakeholder contributions were being analyzed by the OGP Task Force and were to be passed on to the MSF for integration in the final version of the strategy between January and February 2024. Suggestions which might not be integrated in the strategy will be assessed by the MSF as possible commitments to be included in the sixth action plan.[17] The current draft includes five strategic priorities,[18] in line with the five strategic goals identified by the broader OGP Strategy 2023–2028.[19]

For activities related to fostering opportunities for dialogue with women and youth, completion is more limited. Stakeholders attributed this in part to the limits imposed by the MSF Regulations that organizations must have at least one year of prior experience working within the OGP domain to participate.[20] See Commitments 4.01 and 4.02 for further analyses.

The National Strategy for Open Government represents a first for Italy, and once published it can further support the momentum for change across all levels of government. The draft strategy includes the application of open government principles to monitor the use of PNRR funds as a key priority, which is in line with CSO recommendations and carries strategic value in the national context.[21]

As identified during the Action Plan Review,[22] interviewees confirmed that limited high-level political support for the domestic OGP process remains a concern that could potentially limit progress in the long term, especially in relation to the effectiveness of the strategy.[23] The level of commitment among parties involved in the MSF varied, sometimes depending on the personalities of the individual representatives and in other cases affected by internal turnover (both in increasing and diminishing engagement).[24] Some civil society stakeholders further indicated that there was confusion as to the difference between the MSF and the OGP Community, especially in the early stages,[25] and that more systematic involvement of the community during implementation would be desirable.[26]

Commitment 2.01: Strategies and networks for integrity and transparency

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• **Verifiable:** Yes • **Does it have an open government lens?** Yes • This commitment has been clustered as: Cluster 2 – Corruption prevention and culture of integrity (Commitments 2.01 and 2.02) • **Potential for results:** Modest	• **Completion:** Complete • **Early results:** Moderate
This commitment is assessed in Section II.	

Commitment 2.02: Community of practice of those responsible for the prevention of corruption and transparency

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • This commitment has been clustered as: Cluster 2 – Corruption prevention and culture of integrity (Commitments 2.01 and 2.02) • **Potential for results:** Modest	• **Completion:** Complete • **Early results:** Moderate
This commitment is assessed in Section II.	

Commitment 3.01: Promoting opportunities for participation in the PNRR

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Modest	• **Completion:** Limited • **Early results:** No Notable Results
The commitment saw limited completion. It sought to promote opportunities for participation and oversight of the PNRR in two-fold: promoting public debate for increasing knowledge on major works and fostering structured interaction and monitoring between the Ministry of Sustainable Infrastructure and Mobility (MIMS) and civil society through use of a dedicated MIMS platform for monitoring PNRR funds. However, efforts to establish a dedicated MIMS platform were halted due to an overlap of responsibilities between the MIMS and the MEF, which is formally in charge of setting up the ReGiS system to monitor implementation of the PNRR.[27] Similarly, activities to promote public debate were affected by an amendment in the legislative framework (DL 133/2023) that regulates the role of the National Debate Commission.[28] Within this updated landscape, activities focused on awareness raising actions such as training courses in cooperation with the National School of Administration and workshops, webinars, and short promotional videos on public debate.[29] In December 2023, cross-fertilization with Commitment 3.02 and the Participation Hub led to the launch of a dedicated working space on participation towards improved quality of public works.[30] Beyond the action plan period, the working space is expected to continue as a forum to disseminate tools to promote public debates.[31]	

Commitment 3.02: National Hub to support participation policies	
• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Modest	• **Completion:** Complete • **Early results:** No Notable Results

The commitment completed activities to establish a national hub on participation, collecting and documenting existing local and national participatory practices and promoting the establishment of communities of practice in different areas.[32] The Minister for Public Administration formally launched the National Hub on Public Participation on 8 May 2023 during the opening ceremony of Open Gov Week. Sponsored by 11 organisations,[33] the hub was designed through a co-creation process between PAs and CSOs with public consultation on the design through the ParteciPA platform.

In line with IRM recommendations, the hub is hosted on the ParteciPA platform and has 60 organizations subscribed as of March 2024 to participate in debates and receive updates on new materials and meetings. It divides tools into 10 categories, presenting useful toolkits for public participation. Users can provide suggestions on tools to be included via a dedicated online form. Good practices of public participation increased from 7 to 12 between May and December 2023, with 4 additional practices currently under review and a set of working group areas for communities of practice.[34] An additional area, upon the request of the National Working Group on River Contracts, in cooperation with the University of Salerno, was launched in early 2024 with the goal of enhancing visibility of local initiatives. Each community of practice functions as a forum for exchange of relevant proposals to advance these goals as well as serves as a repository of documents and relevant data.[35]

This commitment did not produce notable early results as use of the hub was still limited by the end of the implementation period, according to Italy's End of Term Self Assessment Report.[36] In the longer term, the significance of the hub's impact on civic participation in Italy will depend on uptake. Civil society representatives view the hub as a positive first step towards providing a repository of public participation tools and prioritize continued progress on this initiative.

Commitment 4.01: Gender equality in the public and private sector	
• **Verifiable:** Yes • **Does it have an open government lens?** Yes • Milestones 1 and 2 of this commitment are clustered as: Cluster 1 – Governance and strategy for open government (Commitment 1.01, Milestones 1 and 2 of Commitment 4.01, and Commitment 4.02) • **Potential for results:** Modest	• **Completion:** Limited • **Early results:** No Notable Results.

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This commitment sought to foster gender equality in the public and private sectors. Two milestones focused on widening opportunities for representation and dialogue with women on the OGP multistakeholder forum (MSF) but saw limited completion. According to stakeholders, this was in part due to MSF regulations requiring members to have at least one-year prior experience working within the OGP domain, which limited the involvement of several newcomers, including women's organizations.[37] The mapping of women's organizations at local, national, regional, European, and international levels was carried out as foreseen and, according to an MSF representative, served as a basis to invite some organizations to participate to the OGP Community.[38] However, few women's organizations joined the OGP Community during the implementation period, falling below targeted expansion.[39]

Under a third milestone, the Department of Equal Opportunities (DPO) aimed to develop a platform that makes data on the implementation of the certification system for gender equality in companies, as defined by Law 162/2021,23, accessible and transparent. The initiative on certification was one of the measures included in the PNRR.[40] The platform was created and launched on the DPO website in December 2022.[41] The guidelines regulating the key performance indicators underpinning the achievement of the certification (UNI/PdR 125:2022) were placed under public consultation on the Italian Legislation Authority before being finalized.[42] At the time of writing of this report, a total of 1,269 entities had been certified and listed on the platform , while 46 organizations were listed as accredited certification entities. However, the data is not available in public format and further work needs to be done to integrate the platform with statistical analysis data.[43] A DPO representative stated that inclusion of the initiative in the OGP framework did not enable implementation but contributed to raising awareness about the initiative.[44]

Commitment 4.02: Youth participation

• **Verifiable:** Yes	• **Completion:** Limited
• **Does it have an open government lens?** Yes	• **Early results:** No Notable Results
• This commitment is clustered as: Cluster 1 – Governance and strategy for open government (Commitment 1.01, Milestones 1 and 2 of Commitment 4.01, and Commitment 4.02)	
• **Potential for results:** Modest	

This commitment sought to widen opportunities for representation and dialogue with youth on the OGP multistakeholder forum (MSF) but saw limited completion. According to interviewees, this is in part due to MSF regulations requiring members to have at least one-year prior experience working within the OGP domain – which limited the involvement of several newcomers, including youth organizations.[45] Mapping of youth organizations was carried out as foreseen, but their formal involvement remained limited to the OGP Community during the action plan cycle. Orizzonti Politici, a CSO composed university students, took part in co-creating the first MSF regulations.[46] In December 2023, the Department of Youth Policy of the Presidency of the Council appointed two representatives as OGP Italy contact persons,[47] which could pave the way for more structured, institutionalized cooperation with youth stakeholders.

Consiglio Nazionale Giovani (CNG), a member of the European Youth Forum, also joined the new MSF, following the end of the implementation period.[48]

Commitment 5.01: Enabling inclusive digital innovation

• **Verifiable:** Yes	• **Completion:** Limited
• **Does it have an open government lens?** No	• **Early results:** No Notable Results
• **Potential for results:** Modest	

This commitment achieved limited completion in raising citizens' awareness of digital services and developing digital skills through training (so-called "facilitation points") across Italy's regions. The goal was to institutionalize a network of facilitation points as a reference point for these activities.[49] The network of facilitation points was built and activated in line with the provisions set out in the PNRR. Prior to the implementation period, there were 700 facilitation points.[50] By the end of December 2023, there were almost 1,000 facilitation points across the national territory, falling short of the target of 3,000 points.[51]

Capacity building activities for implementing entities and facilitators were carried out over the course of 2023. In December 2023 a "Digital Republic" portal was launched, making available to the general public capacity building resources, a self-assessment tool, and a map of facilitation points and capacity building events across the national territory.[52] By the end of December 2023, the facilitation points had been accessed 10,552 times.[53] The activity was accompanied by a series of 15 communication and awareness raising events on digital rights. Implementation was affected to a certain extent by administrative issues related to the size of PAs and various levels of governance involved.[54] The commitment was not relevant to open government values and so did not produce notable open government results.

Commitment 5.02: Open standards for inclusiveness and participation of civil society in monitoring of public spending

• **Verifiable:** Yes	• **Completion:** Complete
• **Does it have an open government lens?** Yes	• **Early results:** Moderate
• **Potential for results:** Modest	

This commitment is assessed in Section II.

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[1] **Editorial notes**:
    1.   For commitments that are clustered, the assessment of potential for results and "early results" is conducted at the cluster level, rather than the individual commitment level. As implementation of commitments in the cluster on governance and strategy for open government (1.01, Milestones 1 and 2 of 4.01, and 4.02) varied widely, the assessment of early results is conducted at the individual level, rather than the cluster level (See Section IV. Methodology and IRM Indicators).

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2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see "Italy Action Plan 2021–2023," OGP Italy, March 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/03/Italy_Action-Plan_2021-2023_December_EN.pdf.

3. For more information on the assessment of the commitments' design, see "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership, 14 October 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/10/Italy_Action-Plan-Review_2021-2023_EN.pdf.

[2] "Multistakeholder Forum Regulations," OGP Italy, https://open.gov.it/partecipa/community-ogp-italia/forum-multistakeholder#regolamento.

[3] "Public Consultation on MSF Regulations," ParteciPA, https://partecipa.gov.it/processes/consultazione-5NAP-FMS/f/293.

[4] "Multistakeholder Forum Regulations," OGP Italy.

[5] Multistakeholder forum representative, interview by IRM researcher, 16 January 2024.

[6] Open Government Partnership, Italy End-of-Term Self-Assessment 2022-2023 (Draft version, only available in Italian) https://open.gov.it/sites/default/files/media/documents/2024-01/20242901-Rapporto%20autovalutazione%20finale%205NAP.pdf; Multistakeholder forum representative, interview; Department of Public Function, interview by IRM researcher, 11 January 2024.

[7] Civil society stakeholder, interview by IRM researcher, 19 January 2024; Civil society multistakeholder forum representative, interview by IRM researcher, 4 March 2024.

[8] "Multistakeholder Forum Regulations," OGP Italy. Applications for the upcoming MSF are open at the time of writing of this report, and the current MSF has extended its mandate until the new one is in place. This avoids leaving a vacuum between the end of the fifth action plan and the beginning of the sixth.

[9] "Multistakeholder Forum Regulations," OGP Italy.

[10] "Monitoring reports 5th action plan," OGP Italy, https://open.gov.it/monitora/monitora#rapporti-di-valutazione-5nap.

[11] Comments from Sabina Bellotti (Administrative Innovation, Skills Development and Communication Office, Department for Public Administration) during pre-publication review period, 24 May 2024.

[12] "Public Consultation on MSF Regulations," ParteciPA.

[13] "Report on public consultation for National Strategy for Open Government," ParteciPA, https://partecipa.gov.it/rails/active_storage/disk/eyJfcmFpbHMiOnsibWVzc2FnZSI6IkJBaDdDRG9JYTJWNVNTSWhhRFlyYkhwNWNuSmlkMllxWVdzd2EzVmtNbmQwZG5wMmVEWjRZUVk2QmtWVU9oQmthWE53YjNOcGRHbHZia2tpQWRScGJteHBibVU3SUdacGJHVnZWVzFsUFNVU1pYQnZjJblJmWTI5dWMzVnNkR0Y2YVc5dVpTQnpkU0JUZEhKaCdGRHVm5hV0VnYm1GNmFXOXVZVZ3hsSUhCbGNpQnNpQ0JIYjNabGNtNXNZJR0Z3lhKMGlxOHlNREl6TGpFeUxqSXhMbkJrW mlJN0lHWnBiR1Z1WVcxbEtqMVZZWRVl0T0NjblVtVndiM0owWDJOdmJuTjFiSFJvZW1sdmJtVWxNakJ6ZFNVMjGTjBjbUYwWldkkcFlTVXhlNNRzVoZW1sdmJtJtRnNaU1V5VUhCbGNpbVlXTnJzSlRJRJd1lyOTJaWEp1YnlVeU1HRndaWEowYjE4eU1ESXpMakV5TGpJeEx uQmtaZ1k3QmxRNkVXTnZ1biblJsYm5SZmRlbHdaVWpwRkddG2NHeHBBZMkYwYVc5dUwzZXdzQmtaZ1k3QmxRPSlsImV4cCI6IjlwiMjQtMDUtMjdUMjdDk6MDU6MzcuNzUxWiIsInB1ciI6ImJsb2Jfa2V5In19--51aea586239f1f21b8eddb41ac70b7dc7ada4a66/Report_consultazione%20su%20Strategia%20nazionale%20per%20il%20Governo%20aperto_2023.12.21.pdf?content_type=application%2Fpdf&disposition=inline%3B+filename%3D%22Report_consultazione+su+Strategia+nazionale+per+il+Governo+aperto_2023.12.21.pdf%22%3B+filename%2A%3DUTF-8%27%27Report_consultazione%2520su%2520Strategia%2520nazionale%2520per%2520il%2520Governo%2520aperto_2023.12.21.pdf

[14] Multistakeholder forum representative, interview.

[15] "Report on public consultation for National Strategy for Open Government," ParteciPA.

[16] Civil society multistakeholder forum representative, interview.

[17] "Report on public consultation for National Strategy for Open Government," ParteciPA; Department of Public Function, email correspondence with IRM researcher, 26 February 2024.

[18] The five priorities are: (1) Make the open government method an integral part of the PNRR national strategy, in collaboration with the actors implementing it; (2) Implement open government at the local level, disseminating the lessons learned through experiences at national and International levels; (3) Define and disseminate competencies for open government and foster leadership for its implementation in public management and in organized civil society; (4) Support the spread of open government principles around the world in collaboration and in line with the agendas of international forums; and (5) Implement practices for open government in the areas of greatest impact for reducing inequality, for equity social and for integrity.

[19] "OGP Strategy 2023–2028," Open Government Partnership, https://www.opengovpartnership.org/strategy-2023-2028/#toc_0.

[20] Multistakeholder forum representative, interview; Department of Public Function, interview.

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[21] "IRM Co-Creation Brief: Italy 2023," Open Government Partnership, November 2023, https://www.opengovpartnership.org/wp-content/uploads/2023/11/Italy_Co-Creation-Brief_2023.pdf.

[22] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership.

[23] Libera, interview by IRM researcher, 19 January 2024; National School of Administration, interview by IRM researcher, 16 January 2024; Civil society multistakeholder forum representative, interview, 4 March 2024; Department of Public Function, interview.

[24] National School of Administration, interview; Civil society multistakeholder forum representative, interview, 4 March 2024.

[25] Libera, interview.

[26] Civil society multistakeholder forum representative, interview, 4 March 2024.

[27] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy, 29 January 2024, https://open.gov.it/sites/default/files/media/documents/2024-01/20242901-Rapporto autovalutazione finale 5NAP.pdf.

[28] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[29] "Public Debate Area," ParteciPA, https://partecipa.gov.it/assemblies/dibattito-pubblico/f/278; "Commitment 3.01 Repository," OGP Italy, https://open.gov.it/documenti-opengov?f%5B0%5D=actions%3A118&f%5B1%5D=commitments%3A176&f%5B2%5D=plans%3A52.

[30] "Public Debate Area," ParteciPA.

[31] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[32] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership.

[33] "Organizations promoting the initiative," ParteciPA, https://partecipa.gov.it/assemblies/hub-partecipazione/f/208.

[34] The practice areas include: (1) Digital technologies in support of public participation; (2) participation towards increased quality of local territories; (3) quality of public participation; (4) shared public administration and community welfare; and (5) participation towards sustainable development and improved quality of public works.

[35] "National Participation Hub," ParteciPA, https://partecipa.gov.it/assemblies/hub-partecipazione.

[36] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[37] Multistakeholder forum representative, interview; Department of Public Function, interview.

[38] Multistakeholder forum representative, interview.

[39] The target was set at 40, from a baseline of 27 participating organizations. Evidence suggests that the achieved participation was at 30. See "Monitoring," OGP Italy, https://open.gov.it/governo-aperto/piano-nazionale/5nap/monitoraggio.

[40] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership.

[41] "Equal Opportunity Certification," Pari Opportunita, https://certificazione.pariopportunita.gov.it/public/home.

[42] Department of Equal Opportunities, interview by IRM Researcher, 29 January 2024.

[43] Department of Equal Opportunities, interview.

[44] Department of Equal Opportunities, interview.

[45] Multistakeholder forum representative, interview; Department of Public Function, interview.

[46] Comments from Sabina Bellotti (Administrative Innovation, Skills Development and Communication Office, Department for Public Administration) during pre-publication review period, 24 May 2024.

[47] "Fifth interim monitoring report of Italy action plan 2022–2023, " OGP Italy, December 2023, https://open.gov.it/sites/default/files/media/documents/2023-12/V%20REPORT%20VALUTAZIONE%205NAP_20231218.pdf

[48] Comments from Sabina Bellotti (Administrative Innovation, Skills Development and Communication Office, Department for Public Administration) during pre-publication review period, 24 May 2024.

[49] "IRM Action Plan Review: Italy 2022–2023," Open Government Partnership.

[50] "Italy Action Plan 2021–2023," OGP Italy.

[51] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[52] "Map of Facilitation Points," Repubblica Digitale, https://repubblicadigitale.gov.it/portale/rete-dei-punti-di-facilitazione-digitale.

[53] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

[54] "Italy End-of-Term Self-Assessment 2022–2023," OGP Italy.

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