

# **Independent Reporting Mechanism**

Action Plan Review:  
Norway 2023–2027

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

# Table of Contents

Section I: Overview of the 2023–2027 Action Plan	2
Section II: Promising Commitments in Norway 2023-2027 Action Plan	4
Section III. Methodology and IRM Indicators	10
Annex 1: Commitment by Commitment Data	13
Annex 2: Action Plan Co-Creation	14

## Section I: Overview of the 2023–2027 Action Plan

**Norway's fifth action plan includes commitments addressing public procurement, digital inclusion, and anti-corruption. The action plan presents an opportunity to implement mechanisms for broader participation of civil society groups and other interested groups, beyond those stakeholders already participating in the process. The ambition of commitments can be enhanced by including actions that represent policy changes rather than intermediate outcomes of a process. Norway can take advantage of the action plan's midterm refresh to account for emerging lessons from the first two years of implementation and adapt the action plan commitments accordingly.**

Norway's fifth action plan is the country's first four-year action plan. It includes seven commitments in the areas of public procurement, government data management, and anti-corruption. It also introduces openness in the justice sector and digital inclusion as emerging policy areas.

Highlighted as promising, Commitment 1 continues a similar commitment on digitizing public procurement included in the previous action plan, which reached limited completion. This time, the commitment focuses on promoting the publication of public procurement data and statistics, including green and environmentally friendly public procurement data. This commitment could improve the quality and availability of public procurement data and remove barriers to public procurement transparency.

Initiatives on anti-corruption and openness in the justice sector propose activities that do not represent a change in public practices. Instead, they offer initial analyses without any clarity on further actions. The ambition of this action plan is similar to that of the fourth action plan, where only one commitment was rated as having transformative potential impact.

Compared to the 2019–2022 action plan co-creation process, the OGP Council met more frequently to discuss the action plan and created more opportunities for stakeholders to submit proposals. An initial consultation saw the government proposing seven priority areas. Afterwards, five priority areas that reflect both government and civil society priorities were chosen for inclusion in the final action plan.<sup>1</sup> Commitment 7 on openness in the justice sector was proposed by civil society.

The government Point of Contact (POC) highlighted that the Ministry of Digitalization and Public Governance made efforts to engage as many civil society organizations as possible, through a

### AT A GLANCE

**Participating since** 2011

**Number of commitments:** 7

#### Overview of commitments:

Commitments with an open government lens: 7 (100%)

Commitments with substantial potential for results: 1 (14%)

Promising commitments: 1 (14%)

#### Policy areas:

Carried over from previous action plans:

- Public procurement
- Government data management
- Anti-corruption

Emerging in this action plan:

- Openness in justice
- Digital inclusion

#### Compliance with OGP minimum requirements for co-creation:

Yes

direct invitation, which was also published on Norway’s OGP website.<sup>2</sup> Both civil society representative and the government POC agree that facilitating the participation of a diverse range of civil society organizations, beyond those already participating in the OGP process, has remained a challenge.<sup>3</sup> This can at least be partly attributed to civil society organizations (CSOs) having multiple alternatives to engage with the government in the Norwegian context outside of the OGP process.<sup>4</sup> Better communication of the scope and benefits of engaging in the OGP process could help incentivize a more diverse range of CSOs and other stakeholders—such as industry groups or private entities—to participate. As a start, the Department of Digitalization and Public Governance (DFD) could try to bring some of the alternative avenues that CSOs use to engage the government under the OGP umbrella.

The co-creation of this action plan was supported through meetings between civil society and government representatives, with greater participation of press organizations under the Norwegian Press Association compared to previous cycles.<sup>5</sup> However, a civil society representative considered it crucial to ensure that stakeholders have timely and clear information on their expected role in the process to guarantee more effective participation.<sup>6</sup>

Four-year action plans include a midterm refresh at the two-year mark, where countries could review the progress of commitment implementation up to date and amend the action plan as needed. Countries can also include new commitments to the action plan. Norway is encouraged to use this opportunity to consolidate emerging lessons from the first two years of implementation as well as to accommodate unforeseen circumstances that may rise during implementation. In terms of thematic areas, Norway could also consider including the lobbying transparency commitment that was submitted after the end of the co-creation process by the DFD at the midterm refresh point, as it could prove promising for advancing sectoral transparency in the country.

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<sup>1</sup> “Norway Action Plan 2024–2027,” Government of Norway, 20 December 2023, [https://www.opengovpartnership.org/wp-content/uploads/2023/12/Norway\\_Action-Plan\\_2023-2027\\_December\\_EN\\_Revised.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/12/Norway_Action-Plan_2023-2027_December_EN_Revised.pdf).

<sup>2</sup> Maria Egeland Thorsnes (Norway Point of Contact), written feedback during pre-publication review period, 6 November 2024.

<sup>3</sup> Tom Arne Nygaard (Former Norwegian OGP Point of Contact), correspondence with IRM researcher, 13 October 2022; Tor Dolvik (Special Advisor at Transparency International Norway), correspondence with IRM researcher, 4 June 2024.

<sup>4</sup> Nygaard, correspondence.

<sup>5</sup> Nygaard, correspondence.

<sup>6</sup> Dolvik, correspondence.

## Section II: Promising Commitments in Norway 2023–2027 Action Plan

The following review looks at the one commitment that the IRM identified as having the potential to realize the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens, and have modest or substantial potential for results. This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of this action plan.

**Table 1. Promising commitments**

Promising Commitments
<b>1. Public Procurement Data:</b> This commitment aims to improve the availability and quality of quantitative public procurement data.

### Commitment 1: Public procurement data

Ministry of Trade, Industry, and Fisheries (NFD); Norwegian Agency for Public and Financial Management (DFØ); Department of National IT Policy and Public Governance (DFD); Transparency International Norway.

For a complete description of the commitment, see Commitment 1 in:

<https://www.opengovpartnership.org/documents/norway-action-plan-2023-2027-december>.

### Context and objectives

This commitment responds to the need for better procurement data in Norway.<sup>1</sup> The public procurement process has been a longstanding shared priority of government and civil society stakeholders.<sup>2</sup> Norway's 2019–2022 action plan included a commitment on digitizing the public procurement process. That commitment achieved limited completion due to issues of data availability and legislative barriers related to data protection.<sup>3</sup> Some progress has been made since in standardizing the data transfer formats between different steps of the procurement process on the *Doffin* platform, Norway's central public procurement database.<sup>4</sup>

This commitment aims to make more data on public procurement available and to create a stable framework for managing procurement data centrally at the Norwegian Agency for Public and Financial Management (DFØ). It focuses on publishing data of public announcements on *Doffin*, statistics of accounting data and supplier information for public agencies, data and statistics on climate and environmentally friendly public procurement, as well as results and data from the biannual DFØ procurement survey.<sup>5</sup> All milestones are expected to be completed by the end of 2024.

### Potential for results: Substantial

This commitment is important especially since a public procurement committee has been appointed to review regulations and propose changes for review in the Norwegian parliament.<sup>6</sup> This commitment could make more data on public procurement in Norway available. Additionally, the collection of green and environmentally friendly procurement data is a novelty for Norway. The commitment is relevant to the OGP value of transparency, as it will increase the types of available public procurement data.

Currently, the use of e-procurement is mandatory for all contracting authorities or entities involved in public contracts exceeding NOK 1.4 million (€117,000).<sup>7</sup> Purchases over this

threshold are also announced on *Doffin*.<sup>8</sup> However, while procurement plans, tender notices, bidding documents, and award notices are published on *Doffin*, there are no structured data i.e., highly organized and easily decipherable data by machine learning algorithms.<sup>9</sup> Therefore, the publication of structured data could lead to more clarity in the procurement process by providing an overview of trends in the sector. It is also unclear if some categories of data and statistics in the commitment would constitute high value public procurement data for end users. Furthermore, while the inclusion of statistics is a positive step, users would be able to independently produce statistics if structured data is published online.<sup>10</sup>

This commitment has substantial potential for results if the DFØ takes the needs and interests of end users into consideration. Overcoming those technical and legal issues in publishing public procurement data could allow interested groups to have information in open format for monitoring and accountability and to identify trends and areas of opportunity in the sector, ultimately ensuring public integrity in the public procurement system. Access to this information could also support media investigation of public procurement. In addition, access to statistical data on green procurement would allow government offices and the public to better understand the environmental impact of procurement and continue advancing in its implementation.

The Open Contracting Partnership (OCP) has highlighted the importance of publishing green and environmentally friendly procurement data in meeting the European Commission's Green New Deal policy objectives. Doing so holds the potential to demonstrate the value of publishing such data to other countries, especially in the Nordic region.<sup>11</sup> The new public procurement regulations that were adopted in January 2024 mandate that all contracting authorities must weigh climate and environmental considerations as award criteria with a minimum of 30% of the total criteria assessed.<sup>12</sup> DFØ data show that in 2024 about 75% of public procurement contracts in 2024 have an environmental weighing of 30% or more or include environmental criteria, compared to around 50% in 2023.<sup>13</sup> While the DFØ has started collecting this data, a civil society stakeholder expressed uncertainty about what 'environmentally friendly procurement' means in practice, as well as the establishment of the technical solution to publish this kind of data.<sup>14</sup>

### **Opportunities, challenges, and recommendations during implementation**

It will be important for the DFØ to engage all relevant ministries in the publication of public procurement data. This commitment could face similar challenges to the previous commitment on digitizing the public procurement process.<sup>15</sup> Data protection laws could again prevent the publication of certain categories of public procurement data, a challenge which the commitment does not directly address.<sup>16</sup> A civil society stakeholder suggested that the government could start by publishing non-sensitive data in the short term.<sup>17</sup> Data ownership is also an issue because, while the DFØ collects public procurement data, neither the DFØ nor the Ministry of Finance own the data. The DFØ must reach out to each public agency individually when collecting public procurement data, which is time-consuming in practice. Compliance is another challenge as public agencies do not always report the winner of public procurement contracts.<sup>18</sup>

For the midterm refresh, the IRM recommends the following:

- **Review legislative barriers to data publication and explore ways to adapt the commitment to existing regulations**, ensuring the publication of public procurement data while protecting personal data privacy. For example, the DFØ could review data protection applications to legal persons as well as legal bans for data ownership by different authorities. The OCP recommends that clear justifications should be provided to the public where data redactions need to be made.<sup>19</sup>

- **Create spaces on *Doffin* for users to suggest high value data categories and flag potential inaccuracies in the available data**, such as education, health or public finances. Datasets are deemed high value if they contain data for a key set of fields based on local users' needs.<sup>20</sup> The DFØ could also involve the private entities such as chambers of commerce and business associations. For example, Ukraine's DoZorro<sup>21</sup> and Italy's OpenCoesione<sup>22</sup> platforms allow users to provide feedback on procurement data.
- **Centralize public procurement data collection** and streamline data sharing between public agencies and the DFØ as the publisher of the data.
- **Draw from the newly released data to inform the public on key issues**, through accessible and widely disseminated reports on key facts. This awareness campaign could encourage data reuse by journalists, researchers, students and the public through hackathons or investigative journalism contest utilizing data published on *Doffin*.
- **Enhance public procurement transparency at the local level**. This would allow interested stakeholders to review public procurement data at the local level. For example, Scotland is implementing a procurement management information platform to improve open fiscal data at the local level, including in public procurement.<sup>23</sup>

### Other commitments

Other commitments that the IRM did not identify as promising are discussed below. This review provides recommendations to contribute to the learning and implementation of these commitments. As Norway is implementing a four-year action plan, the country will have to schedule a mandatory refresh at the two-year mark, reviewing progress up to that point and potentially amending the action plan or taking stock of areas for improvement for the remaining two years of implementation.

**Commitment 2** aims to ensure digital inclusion by applying universal design regulations for public sector websites and apps, focusing on people with visual, hearing, and/or mobility impairments or those speaking a primary language other than Norwegian. The commitment introduces the novel element of annually controlling the extent to which public bodies comply with the regulations, reporting the results to the European Union (EU), and making them publicly available.<sup>24</sup> A civil society representative stressed the importance of ensuring that these regulations are followed in the education sector.<sup>25</sup> However, the commitment text lacks specific milestones, therefore making the timeline activity implementation unclear. Furthermore, *Uu-tilsynet* (Authority for Universal Design of ICT) has already implemented three of the six activities in the commitment, which makes it difficult to assess how this commitment would expand this work. During implementation, Norway could add milestones to this commitment and allocate adequate resources to the *Uu-tilsynet* to scale up its public and private sector controls. Finally, *Uu-tilsynet* is encouraged to tailor the definition of universal design for different groups i.e., ensuring that people with hearing impairments are able to communicate in writing and have access to closed captions in videos and audio clips.

For **Commitment 3**, the Ministry of Digitization and Public Governance (DFD) aims to develop a common template for public sector websites on presenting how they process personal data. The goal is to make information about the processing of personal data more understandable for the public. However, it is unclear if the DFD intends to mandate the use of template by all public sector entities. At the midterm refresh, the DFD could take stock of the uptake of the template and discuss how to get more public institutions to adopt it. The DFD could utilize the Language Council of Norway's Plain Language Guide for civil servants when developing the template.<sup>26</sup>



**Commitment 4** aims to organize free training programs for people to develop their digital skills, regularly survey digital skills levels, develop local guidance services, and hold businesses accountable for digital inclusion. The trainings are part of a DFD-led grant program that runs until 2025 and carried out with civil society organization *Seniornett, HK-dir* (Norwegian Directorate for Higher Education and Skills), and KS (Norwegian Association of Local and Regional Authorities). An official of the Norwegian Digital Agency (*DigDir*) noted that the goal of reducing the number of citizens over 16 years of age with weak basic digital skills from 14% in 2021 to 10% in 2025 may not be realistic.<sup>27</sup> The government has created a multistakeholder forum for digital inclusion which meets twice a year to discuss challenges.<sup>28</sup> At the two-year mark of the action plan, Norway could include the meetings of the forum as an activity in the commitment, and incorporate its feedback into digital inclusion policy. Norway could also include the forum’s entire work plan to ensure that the commitment encompasses all relevant avenues of stakeholder discussion on the issue of digital inclusion. Also, as the training program is expected to end in December 2025, Norway could reassess the success metric at the two-year mark and determine any adjustments necessary for the last two years of the implementation period.

**Commitment 5** aims to evaluate whether the *eInnsyn* publishing service supports the right of access in accordance with the Freedom of Information Act and whether it supports full-text publishing. Additionally, it aims to assess the sustainability of *eInnsyn*’s funding model and potential efficiency gains for administrative processes related to the handling of access requests. The commitment will result in a report from the evaluation but it is unclear what additional steps that will be taken to address issues that may be raised in the report. During implementation, the IRM recommends publishing the evaluation report and addressing potential issues raised in the report, incorporating their solutions in the functioning of *eInnsynn*.

**Commitment 6** aims to produce a white paper on economic crime, including corruption, and create a website with information about public authorities’ anti-corruption efforts. The commitment was proposed by civil society, citing a lack of progress on domestic anti-corruption efforts.<sup>29</sup> The Ministry of Justice and Public Safety published the white paper in March 2024<sup>30</sup> which has been highlighted by civil society as evidence of the need for a national anti-corruption strategy and separate corruption from other forms of financial crime in policy making.<sup>31</sup> The Ministry of Justice highlighted that, during implementation of the measures in the white paper, it will consider input from civil society.<sup>32</sup>

**Commitment 7** aims to improve the rules around press access to police documentation of criminal cases. The OGP Point of Contact noted that organizations within the Norwegian Press Association are interested in accessing these documents and that their contributions were influential in the inclusion of the commitment in the action plan.<sup>33</sup> However, the commitment lacks specific milestones, which makes it difficult to assess how it will facilitate access to criminal case documents. During implementation, the Ministry of Justice and Public Security could clarify the proposed solution, introduce concrete milestones, and hold regular meetings with interested press outlets and civil society organizations to share the progress of implementation.

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<sup>1</sup> Maria Egeland Thorsnes (OGP Norway Point of Contact), correspondence with IRM staff, 30 July 2024.

<sup>2</sup> Birgit Enger Nordstrand (Director of Governance and Digitalization, Procurement at the Norwegian Agency for Public and Financial Management), interview by IRM staff, 3 September 2024.

<sup>3</sup> “IRM Results Report: Norway 2019–2022,” Open Government Partnership, 15 May 2023, <https://www.opengovpartnership.org/documents/norway-results-report-2019-2022>.



- <sup>4</sup> Tor Dolvik (Special Adviser at Transparency International Norway), correspondence with IRM staff, 5 September 2024; Nordstrand, interview.
- <sup>5</sup> The Norwegian Agency for Public and Financial Management conducts a biannual public procurement survey of all state and municipal enterprises and are used to improve public procurement processes. The 2024 survey results is available at: <https://anskaffelser.no/innkjopsledelse/anskaffelsesundersokelsen>.
- <sup>6</sup> "Høring NOU 2024: 9 Ny lov om offentlige anskaffelser," [Consultation NOU 2024: 9 New Public Procurement Act], Government of Norway, <https://www.regjeringen.no/no/dokumenter/horing-nou-20249-ny-lov-om-offentlige-anskaffelser/id3039354/?expand=horingsbrev>.
- <sup>7</sup> Alif Amund Gulsvik, Stian Hultin Oddbjørnsen, and Ronny Rosenvold, "CMS Expert Guide to Public Procurement – Norway," CMS Kluge, 26 August 2022, <https://cms.law/en/int/expert-guides/cms-expert-guide-to-public-procurement/norway>; Dolvik, correspondence, 5 September 2024.
- <sup>8</sup> "Country Commercial Guide: Selling to the Public Sector, United States International Trade Administration, 20 January 2024, <https://www.trade.gov/country-commercial-guides/norway-selling-public-sector>.
- <sup>9</sup> "Structured vs unstructured data," IBM, 29 June 2021, <https://www.ibm.com/think/topics/structured-vs-unstructured-data>.
- <sup>10</sup> Karolis Granickas (Europe Head at Open Contracting Partnership), interview by IRM staff, 23 July 2024.
- <sup>11</sup> Granickas, interview.
- <sup>12</sup> Anette Ensrud Kraakevik and Patrick Oware, "Important changes to the procurement regulations – tightening requirements to consider climate and environmental concerns," Wikborg Rein, 7 August 2023, <https://www.wr.no/en/news/important-changes-to-the-procurement-regulations-tightening-requirements-to-consider-climate-and-environmental-concerns>.
- <sup>13</sup> Jonas Karstensen (Senior Advisor at Norwegian Agency for Public and Financial Management), correspondence with IRM staff, 12 September 2024; "Statistikk om klima- og miljøhensyn i offentlige anskaffelser," [Statistics on climate and environmental considerations in public procurement], Norwegian Agency for Public and Financial Management, <https://anskaffelser.no/bekreftige-anskaffingar/klima-og-miljo/statistikk-om-klima-og-miljohensyn-i-offentlige-anskaffelser>.
- <sup>14</sup> Dolvik, correspondence, 5 September 2024.
- <sup>15</sup> "IRM Results Report: Norway 2019–2022, Open Government Partnership.
- <sup>16</sup> Tor Dolvik (Special Adviser at Transparency International Norway), correspondence with IRM researcher, 4 June 2024.
- <sup>17</sup> Dolvik, correspondence, 4 June 2024.
- <sup>18</sup> Nordstrand, interview.
- <sup>19</sup> "How can we legislate for open contracting?" Open Contracting Partnership, 2021, <https://www.open-contracting.org/wp-content/uploads/2021/10/OCP2021-OCLegislative-Guide.pdf>.
- <sup>20</sup> Andrew Mandelbaum, "From transparency to data use: rising to open contracting's next challenge," Hivos, 23 November 2017, <https://hivos.org/blog-from-transparency-to-data-use-rising-to-open-contractings-next-challenge>.
- <sup>21</sup> "Ukraine – Open Public Procurement, 2016–2018 Ukraine OGP Action Plan," Open Government Partnership, <https://www.opengovpartnership.org/members/ukraine/commitments/UA0064>.
- <sup>22</sup> "Italy – Information System on the Status of Actions Falling Under the Unitary Regional Planning, 2012–2013 Italy OGP Action Plan," Open Government Partnership, <https://www.opengovpartnership.org/members/italy/commitments/IT0003>.
- <sup>23</sup> "Scotland, United Kingdom – Fiscal Openness and Transparency: Improving the accessibility and usability of our data and information about the public finances, 2021–2025 Scotland, United Kingdom Action Plan," Open Government Partnership, <https://www.opengovpartnership.org/members/scotland-united-kingdom/commitments/gbsc0001>.
- <sup>24</sup> "Norway Action Plan 2024–2027", Government of Norway, 20 December 2023, [https://www.opengovpartnership.org/wp-content/uploads/2023/12/Norway\\_Action-Plan\\_2023-2027\\_December\\_EN\\_Revised.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/12/Norway_Action-Plan_2023-2027_December_EN_Revised.pdf).
- <sup>25</sup> Øydis Lebiko (Political Advisor at Norwegian Association for the Hearing Impaired), correspondence with IRM staff, 1 October 2024.
- <sup>26</sup> "Klarspråk," [Plain Language], Språkrådet – Language Council of Norway, <https://sprakradet.no/klarsprak>.
- <sup>27</sup> Stian Lindbol, Senior Advisor at the Norwegian Agency for Digitalization, interview with IRM staff, 12.08.2024.
- <sup>28</sup> Lindbol, interview; "Handlingsplan for auka inkludering i eit digitalt samfunn," [Action Plan for increasing inclusion in a digital society], Government of Norway, <https://www.regjeringen.no/no/dokumenter/handlingsplan-for-auka-inkludering-i-eit-digitalt-samfunn/id2984233>.
- <sup>29</sup> Dolvik, correspondence, 5 September 2024.
- <sup>30</sup> "Meld. St. 15 (2023—2024) Felles verdier – felles ansvar – Styrket innsats for forebygging og bekjempelse av økonomisk kriminalitet," [ Report N. 15 (2023—2024) Shared values – shared responsibility – Strengthened efforts to prevent and combat financial crime], Government of Norway, <https://www.regjeringen.no/no/dokumenter/meld.-st.-15-20232024/id3031227>.

<sup>31</sup> "Økende geopolitisk usikkerhet krever en nasjonal antikorrupsjonsstrategi," [Increasing geopolitical uncertainty requires a national anti-corruption strategy], Transparency International Norway, 26 April 2024, <https://www.transparency.no/blog/kende-geopolitisk-usikkerhet-krever-en-nasjonal-antikorrupsjonsstrategi>.

<sup>32</sup> Maria Egeland Thorsnes (OGP Norway Point of Contact), written feedback during pre-publication review period, 6 November 2024.

<sup>33</sup> Egeland Thorsnes, correspondence.

## Section III. Methodology and IRM Indicators

The purpose of this review is not an evaluation. It is intended as a quick, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, a high priority for country stakeholders, a priority in the national open government context, or a combination of these factors.

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

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges IRM identifies to inform a stronger implementation process.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In the Action Plan Review, the IRM follows a filtering and clustering process to identify promising reforms or commitments:

**Step 1:** Determine what is reviewable based on the verifiability of the commitment as written in the action plan.

**Step 2:** Determine if the commitment has an open government lens. Is it relevant to OGP values?

**Step 3:** Review commitments that are verifiable and have an open government lens to identify if certain commitments need to be clustered. Commitments that have a common policy objective or contribute to the same reform or policy issue should be clustered. The potential for results of clustered commitments should be reviewed as a whole. IRM staff follow these steps to cluster commitments:

- a. Determine overarching themes. If the action plan is not already grouped by themes, IRM staff may use OGP's thematic tagging as reference.
- b. Review commitment objectives to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
- c. Organize commitments into clusters as needed. Commitments may already be organized in the action plan under specific policy or government reforms.

**Step 4:** Assess the potential for results of the clustered or standalone commitment.

Filtering is an internal process. Data for individual commitments is available in Annex 1. In addition, during the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).

As described earlier, IRM relies on **three key indicators** for this review:

### I. Verifiability

- **Yes, specific enough to review:** As written in the action plan, the stated objectives and proposed actions are sufficiently clear and include objectively verifiable activities to assess implementation.
- **No, not specific enough to review:** As written in the action plan, the stated objectives and proposed actions lack clarity and do not include explicitly verifiable activities to assess implementation.
- Commitments that are not verifiable will be considered not reviewable, and further assessment will not be carried out.

## II. Open government lens

This indicator determines if the commitment relates to the open government values of transparency, civic participation, or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance by responding to the following guiding questions. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The IRM uses the OGP values as defined in the Articles of Governance. In addition, the following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform or influence decisions? Will the government create, enable, or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association, and peaceful protest?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

## III. Potential for results

The IRM adjusted this indicator—formerly known as the “potential impact” indicator—to take into account the feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, the IRM modified this indicator to lay out the expected results and potential that would be verified in the IRM Results Report after implementation. Given the purpose of this Action Plan Review, the assessment of potential for results is only an early indication of the possibility the commitment has to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area.

The scale of the indicator is defined as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review was prepared by IRM staff and was externally expert reviewed by Brendan Halloran. The IRM methodology, quality of IRM products, and review process are overseen by IRM’s IEP. For more information, see the IRM Overview section of the OGP website.<sup>1</sup>

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<sup>1</sup> IRM Overview: <https://www.opengovpartnership.org/irm-guidance-overview/>.

## Annex 1: Commitment by Commitment Data<sup>12</sup>

<p><b>Commitment 1: Public procurement data</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Substantial</li> </ul>
<p><b>Commitment 2: Enforce regulations for universal design of ICT solutions</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<p><b>Commitment 3: Simplified privacy statements on public websites</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<p><b>Commitment 4: Digital Inclusion</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<p><b>Commitment 5: Evaluation of eInnsyn</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Unclear</li> </ul>
<p><b>Commitment 6: Develop a more strategic approach to anti-corruption work</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<p><b>Commitment 7: Openness in the justice sector</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Unclear</li> </ul>

<sup>1</sup> **Editorial notes:**

1. For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, rather than the individual commitments.
2. Commitment short titles may have been edited for brevity. For the complete text of commitments, please see Norway's action plan: [https://www.opengovpartnership.org/wp-content/uploads/2023/12/Norway\\_Action-Plan\\_2023-2027\\_December\\_EN\\_Revised.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/12/Norway_Action-Plan_2023-2027_December_EN_Revised.pdf)

## Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the OGP Participation and Co-Creation Standards that came into force on 1 January 2022.<sup>1</sup> The IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. Table 2 outlines the extent to which the countries' participation and co-creation practices meet the minimum requirements that apply during development of the action plan.

OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. Action plans co-created and submitted by 31 December 2023 fall within the grace period. The IRM will assess countries' alignment with the standards and their minimum requirements.<sup>2</sup> However, countries will only be found to be acting contrary to process if they do not meet the minimum requirements for action plans co-created in 2024 and onwards.

Please note that, according to the OGP National Handbook, countries implementing four-year action plans must undertake a refresh process at the two-year mark. Countries are expected to meet minimum requirements 3.1 and 4.1 during the refresh process.<sup>3</sup> IRM assessment of the refresh process will be included in the Results Report.

**Table 2. Compliance with minimum requirements**

Minimum requirement	Met during co-creation?	Met during implementation?
<b>1.1 Space for dialogue:</b> The Stakeholders' Forum met four times during the co-creation process on 23 June 2022, 20 September 2022, and 13 and 16 January 2023. <sup>4</sup> The forum continued to be consulted on the action plan after the January 16 meeting. <sup>5</sup> Information on the OGP Council meetings, <sup>6</sup> its mandate, and membership are available online. <sup>7</sup>	Yes	<i>To be assessed in the Results Report</i>
<b>2.1 OGP website:</b> The Ministry of Digitalization and Public Governance (DFD) maintains a dedicated OGP website with information on the OGP process in Norway. <sup>8</sup> The website was last updated in 2024, after the adoption of the action plan.	Yes	<i>To be assessed in the Results Report</i>
<b>2.2 Repository:</b> There is an online repository with information on the co-creation process as well as the status of commitments in the 2023–2027 action plan. It was updated at least twice a year during the co-creation process.	Yes	<i>To be assessed in the Results Report</i>
<b>3.1 Advanced notice:</b> The public consultation notice was published on 1 July 2022 with a deadline for public inputs on 25 August 2022. <sup>9</sup>	Yes	To be assessed in the Results Report
<b>3.2 Outreach:</b> The DFD conducted outreach to CSO members of the multi-stakeholder forum as well as other CSOs that have expressed interest in the OGP process in the past via email. The DFD also conducted public consultation on <a href="https://reggeringen.no">reggeringen.no</a> to accept public comments on the draft action plan.	Yes	Not applicable
<b>3.3 Feedback mechanism:</b> The government collected input through an online consultation in June 2023 on the Norwegian OGP website. <sup>10</sup>	Yes	Not applicable
<b>4.1 Reasoned response:</b> Stakeholder input from the online consultation is available on the Norwegian OGP website. <sup>11</sup> The government provided feedback on how CSO proposals were	Yes	To be assessed in the Results Report



considered in meetings between CSOs and government ministries in the fall of 2022 and January 2023. <sup>12</sup>		
<b>5.1 Open implementation:</b> The IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.	Not applicable	<i>To be assessed in the Results Report</i>

Overall, the OGP process in Norway could be strengthened through the following measures:

- Formalize the terms of participation in the multi-stakeholder forum that align and clarify the roles and expectations of both government and civil society stakeholders. As a civil society representative pointed out, this could also facilitate the engagement of new CSOs with interests in relevant thematic priorities but are not yet familiar with the OGP process.<sup>13</sup>
- The Ministry of Local Government and Regional Development (KDD) could update the mandate as well as terms of reference and membership of the OGP Council on the new OGP website.
- Regularly update the online repository (at least twice a year) with evidence on the implementation status of commitments, to ensure that stakeholders are kept informed of any progress and development.
- Document dialogue between government and civil society to ensure that stakeholders have clear information on how their contributions influence the government’s decision-making.
- The DFD could expand its outreach to civil society and other interested stakeholders. For example, the government could promote the OGP process during *Arendalsuka*<sup>14</sup> and through official social media platforms, such as LinkedIn.

<sup>1</sup> “OGP Participation and Co-Creation Standards,” Open Government Partnership, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards>.

<sup>2</sup> “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, <https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements>.

<sup>3</sup> See Section 2.3 in: “OGP National Handbook,” Open Government Partnership, 2022, <https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2022>.

<sup>4</sup> “Norway Action Plan 2024–2027,” Open Government Partnership, 20 December 2023, [https://www.opengovpartnership.org/wp-content/uploads/2023/12/Norway\\_Action-Plan\\_2023-2027\\_December\\_EN\\_Revised.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/12/Norway_Action-Plan_2023-2027_December_EN_Revised.pdf).

<sup>5</sup> “Norway Action Plan 2024–2027,” Open Government Partnership.

<sup>6</sup> Maria Egeland Thorsnes (OGP Norway Point of Contact), correspondence with IRM staff, 30 July 2024.

<sup>7</sup> “OGP-rådet,” [OGP Council], Government of Norway, <https://www.regjeringen.no/no/dep/dfd/org/styrer-rad-og-utvalg-under-digitaliserings-og-forvaltningsdepartementet/ogp-radet/id2577472>.

<sup>8</sup> “Norway OGP Website,” Government of Norway, <https://open.regjeringa.no>.

<sup>9</sup> “Norway Action Plan 2024–2027,” Open Government Partnership.

<sup>10</sup> “Norway Action Plan 2024–2027,” Open Government Partnership.

<sup>11</sup> “Høring - Open Government Partnership (OGP) – innspill til handlingsplan 5,” [Consultation – Open Government Partnership (OGP) – input to action plan 5], Government of Norway, 4 July 2022, <https://www.regjeringen.no/no/dokumenter/open-government-partnership-ogp-innspill-til-handlingsplan-5/id2920957/?showSvar=true&consterm=&page=1&isFilterOpen=true>.

<sup>12</sup> Tor Dolvik (Special Advisor at Transparency International Norway), correspondence with IRM staff, 15 October 2024.

<sup>13</sup> Tor Dolvik (Special Advisor at Transparency International Norway), correspondence with IRM researcher, 4 June 2024.

<sup>14</sup> *Arendalsuka* (Arendal Week) is an independent annual national festival where political, civil society, and business stakeholders meet and debate regarding policy formulation for the present and future. Its stated goal is to strengthen democracy in Norway.