

Independent Reporting Mechanism

Action Plan Review:
Slovak Republic 2024–2026

Open
Government
Partnership



Independent
Reporting
Mechanism

Table of Contents

Section I: Overview	2
Section II: Promising Commitments	5
Section III: Methodology and IRM Indicators	14
Annex 1: Commitment Data	16
Annex 2: Action Plan Co-Creation	17

Section I: Overview

The Slovak Republic’s sixth action plan includes promising commitments on media freedom and beneficial ownership transparency. The co-creation process was open but a change in government and political uncertainty limited the engagement of civil society in the process. During implementation, the IRM recommends that the Office of the Plenipotentiary reengage civil society in the multi-stakeholder forum and provide frequent implementation updates.

The Slovak Republic’s sixth action plan has seven commitments. Those on participatory policymaking, civic education, beneficial ownership transparency, whistleblower protection, and open data build on previous OGP cycles. Commitment 3 on media freedom and protection of journalists addresses a new area for the Slovak Republic.

The action plan generally aligns with the priorities of the previous government (which adopted the action plan) and civil society.¹ Most commitments are ongoing reforms that started before the action plan co-creation process. Several commitments, including Commitment 3, were inspired by the Slovak Republic’s Summit for Democracy commitments.² The IRM identified two commitments as promising. Commitment 3 aims to create a national platform to coordinate domestic and international initiatives on supporting media freedom. The platform will also develop an implementation plan for recommendations relating to journalistic safety and on countering the use of strategic lawsuits against public participation (SLAPPs). This platform offers an opportunity to maintain dialogue on this important issue.

Commitment 4 to ensure beneficial ownership data compliance with EU Directive 2015/849 and link beneficial ownership data among different registers is continued for the third consecutive action plan.³ Applying the same level of scrutiny to companies registered on the beneficial ownership register to other companies would increase financial transparency, strengthen integrity, and help prevent corruption and money laundering. It could also help journalists and civil society organizations (CSOs) to investigate potential abuses of political powers.

A change of government in May 2023 prevented high-level political involvement and reduced civil society’s interest to participate in the co-creation process.⁴ As the multistakeholder forum (MSF) did not meet regularly because of political turnover, the Office of Plenipotentiary focused on smaller, topical meetings with civil society.⁵ Nonetheless, CSOs who participated generally

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: 2

Policy areas:

Carried over from previous action plans:

- Innovative participatory policymaking
- Civic education
- Beneficial ownership transparency
- Whistleblower protection
- Open data

Emerging in this action plan:

- Media freedom
- Measuring open governance

Compliance with OGP minimum requirements for co-creation: Yes

perceived the co-creation process as open.⁶ CSOs, academic institutions, and individuals interested in open government could request to participate.

The action plan underwent a standard public consultation in accordance with the Slovak legislative process. On 24 April 2023, the Office of the Plenipotentiary⁷ published preliminary information on the development of the action plan on the SloV-Lex portal.⁸ The Office of the Plenipotentiary also published the draft action plan on its website for public commenting.⁹ The draft was then subjected to an intra-agency commenting period within the Ministry of Interior which manages the Office of the Plenipotentiary, followed by an inter-agency comment procedure.¹⁰ While there were sufficient opportunities to participate, the co-creation process would have benefited from having a more detailed timeline or overview of all upcoming possibilities to participate published ahead of the start of the co-creation process.

After the co-creation process concluded, a new government took office in October 2023. It has adopted several legislative proposals in accelerated proceedings, which are normally reserved for urgent circumstances. Moreover, the amendment to the country's Non-Governmental Organization (NGO) Law proposed by a group of parliament members would, if adopted, require all not-for-profit organizations that have received funding over EUR 5000 from outside the Slovak Republic to label themselves as organizations with foreign support.¹¹ This could potentially weaken civic space in Slovakia. The Council of the Government for Non-Governmental Non-Profit Organizations has recommended to the government to disagree with the proposed amendment.¹² The appointment of the new government also led to changes in the leadership of the Office of the Plenipotentiary. While the plenipotentiary position has always been seen as a political nomination, the new plenipotentiary does not have a track record of working with the civil society sector and CSOs have expressed dissatisfaction with measures taken by the new plenipotentiary.¹³ During implementation, the IRM recommends that the Office of the Plenipotentiary reengage civil society in the multistakeholder forum and provide frequent implementation updates to maintain its good standing in OGP.

¹ Pavol Szalai (Head of the EU-Balkans Desk at Reporters Without Borders), interview by IRM researcher, 25 June 2024; Jana Feherpatoky Kuzmová (Institute for Active Citizenship) interview by IRM researcher, 13 June 2024.

² "OGP Summit For Democracy Resources," *Open Government Partnership*, 20 August 2024, https://docs.google.com/spreadsheets/d/1KN_HWVdQCZrVgQDILerLVGfXPvK-kwwtMYBTCypRF6Y/edit?gid=1983962610 - gid=1983962610.

³ "Open Government Partnership National Action Plan of the Slovak Republic 2020–2021," *Office of the Plenipotentiary*, 13 November 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/12/Slovakia_Action-Plan_2019-2021_EN.pdf.

⁴ Lucia Lacika (Office of the Plenipotentiary), interviews by and correspondence with IRM researcher, 20 November 2023, 10 January 2024, and 3 May 2024.

⁵ Lacika, interviews and correspondence.

⁶ Xénia Makarová (Stop Corruption Foundation), interview by IRM researcher, 4 June 2024.

⁷ "Predbežná informácia k tvorbe nového Akčného plánu Iniciatívy pre otvorené vládnutie na roky 2024–2026 bola zverejnená na portáli SloV-Lex," [Preliminary information on the development of the new Open Government Initiative Action Plan for 2024–2026 has been published on the SloV-Lex portal], *Office of the Plenipotentiary*, 24 April 2023, https://www.minv.sk/?ros_vsetky-spravy&sprava=predbezna-informacia-k-tvorbe-noveho-akcneho-planu-iniciativy-pre-otvorene-vladnutie-na-roky-2024-2026-bola-zverejnen-na-portali-slov-lex.

⁸ "PI/2023/130 Návrh Akčného plánu Iniciatívy pre otvorené vládnutie na roky 2024–2026," [Draft Open Government Partnership Action Plan 2024–2026], *SloV-Lex*, 13 May 2023, <https://www.slov-lex.sk/legislativne-procesy/SK/PI/2023/130>.

⁹ "Vitame pripomienky k nultému návrhu Akčného plánu Iniciatívy pre otvorené vládnutie na roky 2024–2026," [We welcome comments on the Open Government Partnership's Zero Draft Action Plan 2024–2026], *Office of the Plenipotentiary*, https://www.minv.sk/?ros_vsetky-spravy&sprava=vitame-pripomienky-k-nultemu-navrhu-akcneho-planu-iniciativy-pre-otvorene-vladnutie-na-roky-2024-2026.

¹⁰ “LP/2023/492 Návrh Akčného plánu Iniciatívy pre otvorené vládnutie na roky 2024–2026,” [LP/2023/492 Draft Open Government Partnership Action Plan 2024–2026], *Office of the Plenipotentiary*, 14 August 2023, <https://www.slov-lex.sk/legislativne-procesy/SK/LP/2023/492>.

¹¹ “Návrh poslancov Národnej rady Slovenskej republiky Rudolfa Huliaka, Dagmar Kramplovej, Milana Garaja a Adama Lučanského na vydanie zákona, ktorým sa mení a dopĺňa zákon č. 213/1997 Z. z. o neziskových organizáciách poskytujúcich všeobecne prospešné služby v znení neskorších predpisov a ktorým sa menia a dopĺňajú niektoré zákony,” [Proposal of the Members of the National Council of the Slovak Republic Rudolf Huliak, Dagmar Kramplová, Milan Garaj and Adam Lučanský to issue an Act amending Act No. 213/1997 Coll. on non-profit organisations providing generally beneficial services, as amended and supplementing certain acts], *National Council of the Slovak Republic*, 27 March 2024, <https://www.nrsr.sk/web/Default.aspx?sid=zakony/zakon&MasterID=9699>.

¹² K návrhu poslancov Národnej rady Slovenskej republiky Rudolfa HULIAKA, Dagmar KRAMPLOVEJ, Milana GARAJA a Adama LUČANSKÉHO na vydanie zákona, ktorým sa mení a dopĺňa zákon č. 213/1997 Z. z. o neziskových organizáciách poskytujúcich všeobecne prospešné služby v znení neskorších predpisov a ktorým sa menia a dopĺňajú niektoré zákony (parlamentná tlač 245) [On the proposal of the Members of the National Council of the Slovak Republic Rudolf HULIAK, Dagmar KRAMPLOVA, Milan GARAJ and Adam LUČANSKÝ to issue a law amending Act No 213/1997 Coll. on non-profit organisations providing general beneficial services, as amended, and amending and supplementing certain acts (Parliamentary Print 245)], Government Council of the Slovak Republic for Non-Governmental Non-Profit Organizations, 23 April 2024, https://www.minv.sk/swift_data/source/rozvoj_obcianskej_spolocnosti/rada_vlady_pre_mno/rokovania/2024/37_zasadnutie/uznesenie%20c.%204_Navrh%20skupiny%20poslancov.pdf.

¹³ Makarová, interview; “Mimovládky pobúrene reagujú na slová splnomocnenkyne vlády pre rozvoj občianskej spoločnosti,” [Non-government women react indignantly to the words of the government's plenipotentiary for the development of civil society], *Denník Sme*, 11 July 2024, <https://domov.sme.sk/c/23355947/mimovladky-poburene-reaguju-na-slova-splnomocnenkyne-vlady-pre-rozvoj-obcianskej-spolocnosti.html>; Juraj Rizman, “#MySmeObčianskaSpoločnosť?” [WeAreCivicSociety?] *Týždeň*, 17 July 2024, <https://www.tyzden.sk/komentare/112030/mysmeobcianskaspolocnost/?ref=kat>.

Section II: Promising Commitments

The following review looks at the two commitments 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
<p>Commitment 3: Supporting media freedom and the safety of journalists: This commitment aims to establish a national platform to coordinate domestic and international initiatives on supporting media freedom and journalist protection. It also aims to develop a plan for implementing recommendations to enhance the safety of journalists and on countering the use of strategic lawsuits against public participation (SLAPPs).</p>
<p>Commitment 4: Providing beneficial ownership data in a single register: This commitment aims to ensure compliance of beneficial ownership data according to EU Directive 2015/849 and link the data in the beneficial ownership register with the data in the Commercial Register.</p>

Commitment 3: Supporting media freedom and the safety of journalists

Ministry of Culture

For a complete description, see Commitment 3 in the [action plan](#).

Context and objectives

The Slovak Republic's rankings in assessments of media freedom, such as the World Press Freedom Index, fell immediately after the assassination of investigative journalist Ján Kuciak and his fiancée Martina Kušnírová in 2018.¹ In 2021, the Minister of Culture announced a goal of preparing a Constitutional Act on the Protection of Journalists that would strengthen the protection of journalistic sources, including in the digital space.² However, work on the draft stalled. These issues were partially addressed through the Act on Media Services³ and the Act on Publications⁴ adopted in 2022, which extended source protection and the right to information to online media outlets. Nonetheless, online harassment, smear campaigns,⁵ and legal threats against journalists persist⁶ and the Slovak Republic's defamation legislation still remains one of the strictest in Europe.⁷ According to the Investigative Center of Ján Kuciak, 66.2% of surveyed journalists experienced some type of harassment in 2022—76% of which were verbal attacks.⁸

This commitment aims to support media freedom and protection of journalists, inspired by the Slovak Republic's commitments at the Summit for Democracy.⁹ It has three milestones:

- Establish a platform to coordinate the implementation of the Slovak Republic's international and national obligations on press freedom and the protection of journalists.
- Develop a plan for implementing existing recommendations from the EU to enhance the safety of journalists and other media professionals.
- Develop a plan for implementing the Council of Europe (COE) Recommendation¹⁰ on countering the use of strategic lawsuits against public participation (SLAPPs).¹¹

As the platform would be composed of government and non-governmental representatives and would address the legal, policy, institutional or practical conditions related to civic space, the commitment is relevant to the OGP value of civic participation.

Potential for results: Modest

Media freedom, media pluralism, and the working conditions for journalism have declined in the Slovak Republic.¹² This commitment is a positive step towards addressing those challenges, such as SLAPPs, by ensuring the implementation of regulatory safeguards for journalists. The platform (Milestone 1) for cooperation in implementing domestic and international commitments towards protecting media freedom was established in October 2023 under a caretaker government, before the start of the action plan.¹³ A media freedom advocacy officer confirmed that the platform has initiated activities towards safeguarding journalists.¹⁴

The platform met for the first time on 8 November 2023 and continued to meet monthly until June 2024.¹⁵ The chairman of the platform previously served as the National Contact Committee of the COE's Campaign for the Safety of Journalists. It initially included journalists from media outlets, representatives of Slovak and international organizations focusing on media freedom, law enforcement (through the Ministries of Interior and Justice), and civil servants from public agencies.¹⁶ However, in June 2024, the Office of the Plenipotentiary revoked their representative in the platform, a former journalist and director of the Stop Corruption Foundation, without justification.¹⁷ In response, the Investigative Center of Ján Kuciak and Reporters Without Borders suspended their participation in the platform, therefore leaving unequal representation in favor of the state.¹⁸ Prior to these developments, a Reporters Without Borders representative argued that having a space for structured dialogue was essential for improving the conditions for journalistic work.¹⁹ Since the appointment of a new Minister of Culture on 25 October 2023, the ministry has not shared information about the platform's work—such as meeting minutes—on its website.²⁰

The other two milestones could improve the safety and working conditions of journalists in the Slovak Republic.²¹ However, Milestone 2 would benefit from greater clarity. While documents such as Commission Recommendation (EU) 2022/758 and the European Democracy Action Plan are mentioned in the action plan, it is unclear if all recommendations in these documents would be monitored and evaluated. The European Democracy Action Plan provides recommendations on effective and impartial investigation and prosecution of criminal acts against journalists, strengthening cooperation between law enforcement and journalists, and improving access to sources of information for journalists. If all recommendations in these documents are monitored, the commitment could enhance the protection of journalists through increased legal protections and strengthened cooperation with law enforcement.

Since 2022, political actors have used SLAPPs to encourage journalistic self-censorship and suppress contentious topics.²² The implementation of the COE Recommendation on countering the use of SLAPPs (Milestone 3) means that structural and procedural safeguards, remedies, and support for targets and victims of SLAPPs would be encompassed in the national legal framework—strengthening the rights and support of affected journalists. The European Commission adopted the Anti-SLAPP Directive in April 2024, which member states must transpose into national law by 7 May 2026.²³ This falls within the timeframe of the OGP action plan. Transposing the Directive would increase access to information about SLAPPs, as it obliges member states to provide annual statistical data on SLAPP cases e.g., the number of SLAPP cases, the number of court proceedings classified by type of defendant and claimant, as well as the type of submitted claims based on the Directive). The Directive also incorporates

accountability mechanisms by requiring member states to introduce effective, proportionate and dissuasive penalties for SLAPP initiators. The Directive requires member states to include legal provisions that would allow courts and tribunals to dismiss SLAPPs at the earliest possible stage in legal proceedings while remaining compliant with national law. Ensuring that the Directive is transposed into national law would provide safeguards against manifestly unfounded claims or abusive court proceedings brought against journalists on account of their engagement in public participation.

Opportunities, challenges, and recommendations during implementation

This commitment offers the opportunity for the government to demonstrate its support for international and national engagements around media freedom and pluralism. However, a media freedom advocacy officer doubts that the government and the Ministry of Culture will implement the proposals from the platform on safeguarding media independence.²⁴ For example, the platform formally requested the Ministry of Culture to conduct an impact study of the Government Bill on Slovak Television and Radio and on Amendments to Certain Acts of 24 April 2024, which replaced the public broadcaster Radio and Television of Slovakia (RTVS) with the Slovak Television and Radio (STVR).²⁵ Slovak²⁶ and international press freedom organizations²⁷ criticized this Bill as conflicting with the European Media Freedom Act²⁸ and the CoE’s recommendation on public service media governance,²⁹ by placing the public broadcaster under closer control of the government. The ministry has not responded to the request, even though the deadline has passed.³⁰ After the assassination attempt on the Prime Minister on 15 May 2024, the police-initiated security steps to protect the media, including internal rules on monitoring attacks and crimes against journalists in line with the Strategy for the Prevention of Crime and Other Anti-Social Activities until 2028, especially Task 5.2.4.³¹

The IRM recommends the following actions for this commitment:

- The Office of Plenipotentiary could **build trust with civil society stakeholders** involved in the platform. One way of achieving this would be by reinstating Zuzana Petkova as its representative in the platform.
- To ensure its proposals are implemented effectively, the Slovak Republic could **engage high-level government representatives**, such as state secretaries, in the platform’s work, to participate in discussions and propose implementation strategies.
- The Ministry of Culture could **proactively publish agenda items and meeting minutes** from platform meetings on the ministry website.
- For anti-SLAPP measures, the government **could ensure that the European Union’s anti-SLAPP directive is transposed into national law**.³² Particularly important aspects of the EU SLAPP directive in the Slovak context include accelerated treatment of applications for procedural safeguards, early dismissal of manifestly unfounded claims and compensation against abusive court proceedings. The government could also consider adopting the European Commission’s anti-SLAPP recommendation as well as the Council of Europe’s anti-SLAPP recommendation.³³

Commitment 4: Providing beneficial ownership data in a single register

Ministry of Justice

For a complete description, see Commitment 4 in the [action plan](#).

Context and objectives

The Slovak Republic was a pioneer in implementing a beneficial ownership register to fight corruption and money laundering,³⁴ having launched its Register of Public Sector Partners

(RPVS) in 2015.³⁵ The RPVS, run by the Ministry of Justice, contains publicly available data on beneficial owners of companies that wish to participate in public procurement and of companies that held state contracts over EUR 100,000.³⁶ As of 4 October 2024, the RPVS has the data of 45,418 natural and legal persons. In 2017, the Slovak Republic adopted the so-called Anti-Shell Companies Act, which mandates companies engaging with the state to disclose their beneficial owners.³⁷

This commitment aims to provide beneficial ownership data in a single register. The three registers are:

- The RPVS, which publishes data on natural persons, natural persons-entrepreneurs and legal persons who receive monetary benefits or property over the limit set by the relevant law from the state, local government, and other public sector entities.
- The Register of Legal Entities, Businesses, and Public Authorities (RPO), established in 2015 and managed by the Statistical Office, which collects data on all legal entities, businesses, and public authorities in line with the E-Government Act.
- The Commercial Register, managed by the Ministry of Justice, contains data on businesses and has a narrower scope than the RPO.

This commitment has two milestones focused on aligning Slovak legislation with the EU's Sixth Anti-Money Laundering Directive, the EU legislation for disclosing data on beneficial owners³⁸ and connecting the RPVS with the Commercial Register, making it relevant to the OGP value of transparency. If completed, the quality of data on the beneficial owners of up to 300,000 businesses would be better controlled and improved.

The Slovak Republic committed to apply the Beneficial Ownership Data Standard (BODS)³⁹ to the RPO⁴⁰ and connect data from that register with the RPVS.⁴¹ The idea was to increase the number of companies subject to a higher level of scrutiny, associated with the RPVS, which requires pre-emptive control: every application for registration in the RPVS is checked by the Žilina District Court (ex-ante control), and sanctioning mechanisms are attached to it. These safeguards are not present in the Commercial Register or in the RPO, where beneficial ownership data is already held.⁴² However, these commitments were not implemented, and they have been carried forward into the current action plan.⁴³

Potential for results: Substantial

This commitment has substantial potential for results in improving beneficial ownership transparency. It would provide access to beneficial ownership data in a single space and extend the obligation to publish this data to all companies in the Commercial Register. The data from the RPVS has assisted in revealing real beneficiaries of companies that won government contracts under dubious circumstances in the Slovak Republic and the Czech Republic.⁴⁴ This commitment would lead to a tenfold increase of the number of registered companies in the Slovak Republic with an obligation to provide access to information on their real owners. An expert from the Stop Corruption Foundation welcomed the continuation of this commitment and argued that increasing the availability of beneficial ownership data will facilitate the work of investigative journalists and anti-corruption organizations.⁴⁵

Opportunities, challenges, and recommendations during implementation

The same challenges faced by the previous commitments, especially in connecting the RPVS with the RPO, still need to be addressed: capacity and data management challenges, ensuring sustained political support for the commitment, as well as supervising the quality of the

beneficial ownership data.⁴⁶ As of September 2024, the Ministry of Justice confirmed that no political decision has been taken on how to implement the commitment. The procurement for connecting the registers will depend on the selected legislative and technical solution.⁴⁷ The expert from Stop Corruption Foundation expressed concern that the control of data in the Commercial Register is too burdensome to be a task for one court alone, as is now the case, where the data is recorded in the RPVS and checked by the Žilina District Court.

When a company or entrepreneur applies for registration in the Commercial Register, while the courts carry out a formal check of the completeness of the documents, they do not usually verify the truthfulness of the data on assets or permits.⁴⁸ Transparency International Slovakia has shown that even in the current regime, where the volume of published beneficial ownership data represents only 10% of the data to be published under this commitment, many companies, especially those in contractual relations with municipalities, do not register their beneficial owners even though they are legally obligated to do so.⁴⁹ In addition, the expert from the Stop Corruption Foundation stressed that the current government does not seem to prioritize government and business transparency and anti-corruption compared to the previous government.⁵⁰ The Ministry of Justice is also encouraged to also keep in mind and draw lessons from the Court of Justice of the European Union (CJEU) ruling of 22 November 2022 on public beneficial ownership registers, where it applies in the Slovak context.⁵¹

The IRM recommends the following steps:

- **Allocate sufficient funding** for connecting the Commercial Register and the RPVS and for thorough control of the truthfulness and accuracy of the beneficial ownership data.
- **Strengthen human resources** for the implementation of the commitment. For example, to control beneficial ownership data, it could include lawyers with previous experience on the topic to participate in data control and verification.
- The Ministry of Justice could **create a mechanism that enables users to report inaccuracies or discrepancies** identified in published beneficial ownership data and invite civil society to review and verify the accuracy of published data. When incorrect information is identified, the ministry could then prompt the declaring company to update or correct its entry within a defined timeframe.
- To build on progress in beneficial ownership data, the Ministry of Justice could **implement the Beneficial Ownership Data Standard (BODS)**. This will support clearer identification of beneficial owners and improved data quality through structured data as well as facilitate better compliance for companies.
- **Connect the data from the Commercial Register and the RPVS to other databases**, such as the Register of Public Procurers.
- Given the CJEU ruling on beneficial ownership data, **maintain public access to beneficial ownership data through a broadly defined basis of public interest** to ensure transparent public access.

Other commitments

Other commitments that the IRM did not identify as promising commitments are discussed below. This review provides recommendations to contribute to the learning and implementation of these commitments.

Commitment 1 aims to pilot civic deliberation methods on a major societal challenge. The commitment does not specify the method to be piloted, but it mentions citizens' assemblies as an example of civic deliberation. Citizen assemblies would be a new civic deliberation method in the Slovak Republic. However, as the commitment entails piloting civic deliberation methods, its

potential for results is modest. Since citizens are more likely to engage in civic deliberation if the method includes diverse voices and marginalized groups, the IRM recommends ensuring diversity across and within groups for the pilot.⁵² This could be done through sortition of participants to secure a demographically representative sample of the population.⁵³ If the pilot entails citizens' assemblies, these assemblies could be extended to other public agencies and the local level to cover issues that are closer to citizens' daily lives.

Commitment 2 aims to support cooperation between the government and civil society in informal education on democracy, human rights, citizenship, volunteerism, and sustainable development. Previous action plans have included commitments on enhancing dialogue between the government and the non-governmental sector, and on open education practices. However, the focus of this commitment on civic education is new. Recent data from the OECD Program for International Students Assessment (PISA) shows that Slovak students lag behind other OECD countries in using their reading, mathematical and science knowledge, and skills to meet real-life challenges.⁵⁴ A civil society expert on civic education stated that creating a formal platform for civil society and the Ministry of Education, Science, Research, and Sport is crucial for increasing transparency, allowing relevant actors to participate, and making civic education inclusive and attractive in schools.⁵⁵ Her experience from deliberations on the school curriculum reform was discouraging, as their comments were not sufficiently considered. She stressed that, for this collaboration to create tangible results, the ministry should record and respond to feedback from civil society and schools. Additionally, she noted that civic education materials already exist at the EU level and can be translated into Slovak and adapted to the local context.⁵⁶

Commitment 5 aims to improve internal whistleblowing systems in public institutions. The Act on the Protection of Whistleblowers requires all private sector employers with over 50 employees and every public sector employer with over five employees to have internal whistleblowing systems.⁵⁷ According to a survey by the Whistleblowers' Protection Office, many central public agencies have internal reporting systems in place, but whistleblower reports are rare. This commitment is carried over from the previous action plan. For the previous commitment, the Whistleblowers' Protection Office published manuals on internal reporting systems for the public⁵⁸ and private sector.⁵⁹ It also developed quality and effectiveness criteria for internal reporting systems.⁶⁰ The current commitment would introduce obligations for ministries to report to the Whistleblowers' Protection Office on the number of reports they receive. During implementation, the government could organize an awareness-raising campaign for public and private sector employees. Additionally, the government could provide more funding and human resources to the Whistleblowers' Protection Office to response rates to reports. Recent cases of retaliation against whistleblowers are likely to further discourage potential whistleblowers from filing a report.⁶¹

Under Commitment 6, the Ministry of Investment, Regional Development, and Informatization of the Slovak Republic will organize hackathons, "ideathons", and workshops to improve the utilization of published public-sector data and identify data to disclose.⁶² The ministry will also regularly measure the impact of open data on political, social, environmental, economic, and other key aspects of society. The Slovak Republic has included commitments on open data since 2011 and the EU's 2023 Open Data Maturity Index classified the country as an open data "fast-tracker".⁶³ The IRM recommends the ministry to amplify the planned events with an outreach strategy to interested groups. In addition, the government could focus on high-value datasets, as recommended by the European Commission.⁶⁴

Under Commitment 7, the Office of the Plenipotentiary plans to create an “Open and Participatory Government Index” to measure the Slovak Republic’s progress in open governance. According to the action plan, the aim is to create synergy with the OECD’s index of the same name and eliminate duplicate and time-consuming data collection. The commitment is relevant to the OGP value of transparency as the index would increase information on the quality of state institutions. While the effort to measure the level of open governance is laudable, the commitment does not provide actions related to the index results. Thus, the commitment’s potential for results is unclear.

¹ Before the murders of journalists Kuciak and Kušnírová, the Slovak Republic ranked 17th on the 2017 World Press Freedom Index. After the assassination, it dropped to 35th place. In the latest index, it occupied 29th place. See: <https://rsf.org/en/index>.

² “PI/2021/186 Návrh ústavného zákona o slobode médií,” [Draft constitutional law on media freedom], *The Ministry of Culture of the Slovak Republic*, 2021, <https://www.slov-lex.sk/legislativne-procesy/SK/PI/2021/186>.

³ “Zákon o mediálnych službách 264/2022 Z. z.,” [The Act on Media Services], *Slov-Lex*, 2022, <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2022/264/20240724#>.

⁴ SLOV-LEX, Zákon o publikáciách 265/2022 Z. z. [The Act on Publications], *Slov-Lex*. <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2022/265/20220801>.

⁵ “Útok na novinárku sa na sociálnych sieťach šírili prostredníctvom dezinfoscény a politikov Smeru, strana platila aj reklamu,” [The attack on the journalist was spread on social networks through disinfoscene and Smer politicians, the party also paid for advertising], *The Investigative Center of Ján Kuciak*, 10 March 2023, <https://www.icjk.sk/235/Utok-na-novinarku-sa-na-socialnych-sietach-siril-prostrednictvom-dezinfosceny-a-politikov-Smeru-strana-platila-aj-reklamu>.

⁶ “Mapping Media Freedom, Smer party files criminal lawsuits against three journalists over critical commentary,” *The European Centre for Press and Media Freedom*, 7 July 2023, <https://www.mapmf.org/alert/30105>.

⁷ “Trestný zákon 300/2005 Z. z.,” [Criminal Code No. 300/2005 Coll.], *Slov-Lex*, 2005, <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2005/300/20240315>.

⁸ “Novinári v strednej a východnej Európe čelia narastajúcemu počtu útokov, vlády pre ich ochranu nerobia dost’,” [Journalists in Central and Eastern Europe face increasing number of attacks, governments not doing enough to protect them], *The Investigative Center of Ján Kuciak*, 26 September 2023, <https://www.icjk.sk/274/Novinari-v-strednej-a-vychodnej-Europe-celia-narastajucemu-poctu-utokov-vlady-pre-ich-ochranu-nerobia-dost>.

⁹ “OGP Summit For Democracy Resources,” *Open Government Partnership*, 20 August 2024, https://docs.google.com/spreadsheets/d/1KN_HWVdQCZrVqQDILerLVGfXPvK-kwwtMYBTcypRF6Y/edit?gid=1983962610-gid=1983962610.

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¹¹ SLAPPs are vexatious lawsuits targeting journalists that are set out with little or no chance of success and usually ask a disproportionate amount for damages.

¹² Marina Urbániková, “Monitoring media pluralism in the digital era: application of the Media Pluralism Monitor in the European member states and in candidate countries in 2023 – Country Report: Slovakia,” *European University Institute*, 2024, <https://cadmus.eui.eu/handle/1814/77016>.

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¹⁴ Pavol Szalai (Head of the EU-Balkans Desk at Reporters Without Borders), interview by IRM researcher, 25 June 2024.

¹⁵ Szalai, interview; “Prvýkrát zasadla platforma na podporu slobody tlače,” [Platform in support of press freedom meets for the first time], *Euractiv*, 14 November 2023, <https://euractiv.sk/section/kultura-a-media/news/prvykrat-zasadla-platforma-na-podporu-slobody-tlace>.

¹⁶ The list of the members is not publicly available. It was provided to the IRM on request by the former point of contact to OGP at the Office of the Plenipotentiary, who is still active in the platform’s coordination.

¹⁷ “Kancelária Rady pre mediálne služby, Pracovný materiál Kancelárie Rady na rokovanie Rady pre mediálne služby dňa 7. 6. 2023,” [Working paper for the meeting of the Media Services Council on 7 June 2023], *Council for Media Services*, 17 May 2023, https://rpms.sk/sites/default/files/2023-06/2023-06-07_bod7.pdf#page=18.08; Letter provided by the government to the IRM during the pre-publication period, 22 November 2024.

¹⁸ “RSF suspends participation in Slovakia’s press freedom advisory body,” *Reporters Without Borders*, 11 September 2024, <https://rsf.org/en/rsf-suspends-participation-slovakia-s-press-freedom-advisory-body>.

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- ²⁴ Szalai, interview.
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- ²⁸ “Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act)Text with EEA relevance,” *Eur-Lex*, 11 April 2024, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1083>.
- ²⁹ “Recommendation CM/Rec(2012)1 of the Committee of Ministers to member States on public service media governance (Adopted by the Committee of Ministers on 15 February 2012 at the 1134th meeting of the Ministers' Deputies),” Council of Europe, 15 February 2012, https://www.coe.int/en/web/freedom-expression/committee-of-ministers-adopted-texts/-/asset_publisher/aDXmrol0vvsU/content/recommendation-cm-rec-2012-1-of-the-committee-of-ministers-to-member-states-on-public-service-media-governance-adopted-by-the-committee-of-ministers-o.
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Section III: Methodology and IRM Indicators

This product is a concise, 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, represent a high priority for country stakeholders, acknowledged as a priority in the national open government context, or a combination of these factors.

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

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

In the Action Plan Review, the IRM reviews commitments using three indicators:

1. Verifiability: The IRM determines whether a commitment is verifiable as written in the action plan. The indicator is assessed as:

- **Yes/No:** Are the stated objectives and proposed actions sufficiently clear and include objectively verifiable activities to assess implementation?
- Commitments that are not verifiable are considered not reviewable, and no further assessment is carried out.

2. Open Government Lens: The IRM determines if the commitment relates to the open government values of transparency, civic participation, and/or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance. Based on a close reading of the commitment text, the indicator is assessed as:

- **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 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, influence or co-create policies, laws and/or decisions? Will the government create, enable, or improve participatory mechanisms for minorities, marginalized or underrepresented groups?

Will the government improve the enabling environment for civil society (which may include NGO laws, funding mechanisms, taxation, reporting requirements, et cetera)?

Will the government improve legal, policy, institutional or practical conditions related to

civic space such as freedom of expression, association and peaceful assembly that would facilitate participation in the public sphere? Will the government take measures which counter mis- and disinformation, especially online, to ensure people have access to reliable and factual information (which may include digital and media literacy campaigns, fact-checking or fostering an independent news media ecosystem)?

- **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?

3. Potential for Results: The IRM analyzes the expected results and potential that would be verified in the IRM Results Report after implementation. Potential for results is an early indication of the commitment’s possibility 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 indicator is assessed 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 focuses its analysis on promising commitments. Promising commitments are verifiable, have an open government lens, and at least a modest potential for results. Promising commitments may also be a priority for national stakeholders or for the particular context. The IRM may cluster commitments with a common policy objective or that contribute to the same reform or policy issue. The potential for results of clustered commitments is reviewed as a whole.

This review was prepared by the IRM in collaboration with Mária Žuffová as researcher and Andy McDevitt as external expert reviewer. 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).⁷⁸ The IRM methodology, product quality, and review process are overseen by the IEP.⁷⁹

⁷⁸ “International Experts Panel,” *Open Government Partnership*, accessed 15 July 2024, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>.

⁷⁹ For more information, see: “Overview – Independent Reporting Mechanism,” *Open Government Partnership*, accessed 15 July 2024, <https://www.opengovpartnership.org/irm-guidance-overview>.

Annex 1: Commitment Data⁸⁰

<p>Commitment 1: Innovative participatory policymaking</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 2: Supporting partnerships in informal civic education</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 3: Supporting media freedom and the safety of journalists</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 4: Providing beneficial ownership data in a single register</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial
<p>Commitment 5: Improving internal reporting mechanisms for whistleblowers</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 6: Increasing open data impacts</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 7: Measuring open governance through a new index</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear

⁸⁰ Editorial note: For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, not individual commitments. Commitment short titles may have been edited for brevity. For the complete text of commitments, see: “Slovakia Action Plan 2024–2026,” *Office of the Plenipotentiary*, June 2024, https://www.opengovpartnership.org/wp-content/uploads/2024/06/Slovakia_Action-Plan_2024-2026_June_EN.pdf.

Annex 2: Action Plan Co-Creation

The OGP Participation and Co-Creation Standards are guidelines to support OGP members in undertaking collaborative OGP processes.⁸¹ The Standards include minimum requirements that set a baseline for participatory and transparent OGP processes. In the Action Plan Review, the IRM assesses compliance with the minimum requirements applicable during co-creation of the action plan.⁸² Members that have not met all minimum requirements are considered acting contrary to OGP process. The Slovak Republic is acting according to OGP process, as they met all the minimum requirements applicable during development of the action plan. The IRM will assess the Slovak Republic's compliance with OGP process again in two years. Members that are currently not acting according to OGP process can rectify their status by meeting the minimum requirements relevant at the next moment of assessment.⁸³

Table 2. Compliance with minimum requirements

Minimum requirement	Met during co-creation?	Met during implementation?
1.1 Space for dialogue: The Office of the Plenipotentiary formed the Slovak Republic's multistakeholder forum (MSF) in 2021. ⁸⁴ The only official MSF meeting for the action plan took place on 28 March 2023, and civil society was only represented by Post Bellum alongside some academia experts. The second meeting was planned for 4 May 2023, but did not take place due to limited interest from civil society. The government replaced the MSF with smaller, informal meetings. ⁸⁵ Discussions on the OGP action plan were also held as part of the Council of the Government for Non-Governmental Organizations in June 2023 and September 2023. ⁸⁶	Yes	<i>To be assessed in the Results Report</i>
2.1 OGP website: The Office of the Plenipotentiary maintains an OGP-dedicated page on the Ministry of Interior website. ⁸⁷ It is publicly available, and no registration is required.	Yes	<i>To be assessed in the Results Report</i>
2.2 Repository: The website serves as the repository for all OGP-related information and documents. All action plans and IRM reports are published on the website. ⁸⁸ They also maintain the OGP Slovak Republic Facebook page. ⁸⁹ During the development of the 2024–2026 action plan, the Office of the Plenipotentiary regularly updated the website and the Facebook page. ⁹⁰ However, the frequency of OGP-related publications decreased after the appointment of the new plenipotentiary in March 2024.	Yes	<i>To be assessed in the Results Report</i>
3.1 Advanced notice: The Office of the Plenipotentiary provided notice of the ways in which citizens could contribute to the 2024–2026 action plan on 6 April 2023. Proposals could be submitted via a Google Jamboard link until 25 April 2023. ⁹¹ The Office of the Plenipotentiary published preliminary information on the development of the action plan on Slov-Lex portal on 24 April 2023 and it was possible to comment on it until 12 May 2023. ⁹² However, while opportunities to participate were announced	Yes	Not applicable

in advance at the beginning of the action plan cycle, no detailed timeline or upcoming opportunities was provided.		
3.2 Outreach: The Office of the Plenipotentiary conducted several outreach activities to solicit input for the action plan and to raise awareness about thematic areas, including an event devoted to the beneficial ownership register (a commitment in several action plans) ⁹³ aimed at a domestic audience as well as three Facebook posts inviting citizens to participate in the co-creation process dated 11 April, 9 June, and 13 August 2023. ⁹⁴	Yes	Not applicable
3.3 Feedback mechanism: The Office of the Plenipotentiary published the zero draft of the action plan for commenting from 7–19 June 2023. ⁹⁵ In addition, there were opportunities to comment on the draft during the official inter-agency comment process. ⁹⁶ Feedback was also provided via smaller, informal meetings between ministries and civil society organizations. While some were attended by civil society representatives, this was not the case for all meetings. For instance, there were two meetings with Bystriny related to Commitment 1 on citizen assemblies. Regarding Commitment 2 on civic education, the Ministry of Education consulted with relevant organizations (Youth Council Slovakia, Volunteer Centre, Amnesty International, Post Bellum, and Institute for Active Citizenship). Commitment 3 on the protection of media freedom and the safety of journalists and Commitment 4 on beneficial ownership were discussed only with government representatives.	Yes	Not applicable
4.1 Reasoned response: After the early draft was published, ⁹⁷ the Office of Plenipotentiary responded to comments and suggestions, explaining why many of them were not accepted. ⁹⁸ Additionally, the draft was made available for the official inter-agency comment process, which includes mechanisms for reasoned response. ⁹⁹ For instance, if the comments were identified by the commenting authorities as fundamental, i.e. comments on which the commenting authority insists, the submitter could not reject them without discussing them with that authority in the so-called contradictory procedure. If the discrepancy cannot be resolved in this procedure, such comments must be discussed at a cabinet meeting. ¹⁰⁰	Yes	Not applicable
5.1 Open implementation: 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>

⁸¹ “OGP Participation and Co-Creation Standards,” *Open Government Partnership*, 24 November 2021, www.opengovpartnership.org/ogp-participation-co-creation-standards.

⁸² “IRM Guidelines for the Assessment of Minimum Requirements,” *Open Government Partnership*, 31 May 2022, www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements.

⁸³ **Editorial note:** For two-year action plans, the IRM will assess compliance with minimum requirements applicable to implementation in the Results Report. For four-year action plans, the IRM will do so in the Midterm Review. For all action plans,

the IRM will provide a comprehensive analysis of participation and co-creation practices throughout the action plan cycle in the Results Report. See: “OGP National Handbook – Rules and Guidance for Participants (2024),” *Open Government Partnership*, 11 April 2024, www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2024.

⁸⁴ “Otvárame tvorbu nového Akčného plánu Iniciatívy pre otvorené vládnutie na roky 2022–2024 a hľadáme ďalších partnerov z občianskej spoločnosti,” [We are launching the development of a new Open Government Partnership Action Plan for 2022–2024 and are looking for additional civil society partners], *Office of the Plenipotentiary*, 29 October 2021, https://www.minv.sk/?ros_ogp_spravy&sprava=otvarame-tvorbu-noveho-akcneho-planu-iniciativy-pre-otvorene-vladnutie-na-roky-2022-2024-a-hladame-dalsich-partnerov-z-obcianskej-spolocnosti

⁸⁵ Lucia Lacika (Office of the Plenipotentiary), interviews by and correspondence with IRM researcher, 20 November 2023, 10 January 2024, and 3 May 2024.

⁸⁶ “Zápisnica z 34. zasadnutia Rady vlády Slovenskej republiky pre mimovládne neziskové organizácie, ktoré sa konalo dňa 13. júna 2023,” [Minutes of the 34th meeting of the Council of the Government of the Slovak Republic for Non-Governmental Non-Profit Organizations, held on 13 June 2023], *Ministry of the Interior*, 13 June 2023, https://www.minv.sk/swift_data/source/rozvoj_obcianskej_spolocnosti/rada_vlady_pre_mno/rokovania/2023/34_zasadnutie/Zapisnica.pdf; “Zápisnica z 35. zasadnutia Rada Vlády Slovenskej republiky pre mimovládne neziskové organizácie, ktoré sa konalo dňa 26. septembra 2023,” [Minutes of the 35th meeting of the Council of the Government of the Slovak Republic for Non-Governmental Non-Profit Organizations, held on 26 September 2023], *Ministry of the Interior*, 26 September 2023, https://www.minv.sk/swift_data/source/rozvoj_obcianskej_spolocnosti/rada_vlady_pre_mno/rokovania/2023/35_zasadnutie/zapis_RV_MNO_35.pdf; “Predbežná informácia k tvorbe nového Akčného plánu Iniciatívy pre otvorené vládnutie na roky 2024–2026 bola zverejnená na portáli Slov-Lex,” [Preliminary information on the development of the new Open Government Initiative Action Plan for 2024–2026 has been published on the Slov-Lex portal], *Ministry of the Interior*, 24 April 2023, https://www.minv.sk/?ros_ogp_spravy&sprava=predbezna-informacia-k-tvorbe-noveho-akcneho-planu-iniciativy-pre-otvorene-vladnutie-na-roky-2024-2026-bola-zverejnena-na-portali-slov-lex.

⁸⁷ See: https://www.minv.sk/?ros_ogp.

⁸⁸ See: https://www.minv.sk/?ros_ogp_ap.

⁸⁹ See: <https://www.facebook.com/OGPSlovensko/about>.

⁹⁰ For instance, see: https://www.minv.sk/?ros_vsetky-spravy.

⁹¹ “Samit za demokraciu a Iniciatíva pre otvorené vládnutie: hľadáme spoločnú cestu,” [Summit for Democracy and the Open Government Initiative: looking for common ground], *Ministry of the Interior*, 6 April 2023, https://www.minv.sk/?ros_ogp_spravy&sprava=samit-za-demokraciu-a-iniciativa-pre-otvorene-vladnutie-hladame-spolocnu-cestu; and see the Google Jamboard: <https://jamboard.google.com/d/1zGkMENWgi-Uwx1JriW-CPybdKzI5FfbWi5jSpccZc/viewer?f=0>.

⁹² “Preliminary information on the development of the new Open Government Initiative Action Plan for 2024–2026 has been published on the Slov-Lex portal,” *Ministry of the Interior*.

⁹³ “Pozývame vás na podujatie: Transparentnosť konečného užívateľa výhod po rozsudku Európskeho súdneho Dvora,” [We invite you to the event: Transparency of the end-user of benefits after the European Court of Justice judgment], *Ministry of the Interior*, 9 May 2023, https://www.minv.sk/?ros_vsetky-spravy&sprava=pozyvame-vas-na-podujatie-transparentnost-konecneho-uzivatela-vyhod-po-rozsudku-europskeho-sudneho-dvora.

⁹⁴ Office of the Plenipotentiary, “Zapojte sa do tvorby akčného plánu OGP 2024–2026,” [Get involved in the development of the OGP action plan 2024–2026], *Facebook*, 11 April 2023, <https://www.facebook.com/photo/?fbid=602327908608740&set=a.465157615659104>; Office of the Plenipotentiary, “Vitáme pripomienky k nultému návrhu akčného plánu iniciatívy pre otvorené vládnutie na roky 2024–2026,” [We welcome comments on the Open Government Partnership’s Zero Draft Action Plan 2024–2026], *Facebook*, 9 June 2023, <https://www.facebook.com/photo/?fbid=635951851913012&set=a.465157615659104>; Office of the Plenipotentiary, “Návrh nového akčného plánu je v medzirezortnom pripomienkovom konaní,” [The draft of the new action plan is in the inter-ministerial comment procedure], *Facebook*, 13 August 2023, <https://www.facebook.com/photo/?fbid=673400264834837&set=a.465157615659104>.

⁹⁵ Office of the Plenipotentiary, “We welcome comments on the Open Government Partnership’s Zero Draft Action Plan 2024–2026,” *Facebook*.

⁹⁶ “LP/2023/492 Návrh Akčného plánu Iniciatívy pre otvorené vládnutie na roky 2024–2026,” [LP/2023/492 Draft Open Government Partnership Action Plan 2024–2026], *Slov-Lex*, 14 August 2023, <https://www.slov-lex.sk/legislativne-procesy/SK/LP/2023/492>.

⁹⁷ See: <https://docs.google.com/document/d/1bfBfDvV5FMkEzOSPqYVf7zJ2Axv6aAZqZREv3V4wLt4>.

⁹⁸ See: <https://docs.google.com/spreadsheets/d/19NfHO2NroEUc0cyPffuHYclusbjMv4i26UVK-CsXKvW>.

⁹⁹ “LP/2023/492 Návrh Akčného plánu Iniciatívy pre otvorené vládnutie na roky 2024–2026,” [LP/2023/492 Draft Open Government Initiative Action Plan 2024–2026], *Slov-Lex*, 11 September 2023, <https://www.slov-lex.sk/legislativne-procesy/SK/LP/2023/492>.

¹⁰⁰ “Kabinet schválil Akčný plán Iniciatívy pre otvorené vládnutie na roky 2024–2026,” [Cabinet approves Open Government Initiative Action Plan 2024–2026], *Ministry of the Interior*, 27 September 2023, https://www.minv.sk/?ros_vsetky-spravy&sprava=kabinet-schvalil-akcny-plan-iniciativy-pre-otvorene-vladnutie-na-roky-2024-2026.