

# Independent Reporting Mechanism

Action Plan Review: Sweden  
2023-2025

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

## Introduction

In January 2021, the Independent Reporting Mechanism (IRM) rolled out the new products that resulted from the IRM Refresh process.<sup>1</sup> The new approach builds on the lessons learned after more than 350 robust, independent, evidence-based assessments conducted by the IRM and inputs from the OGP community. The IRM seeks to put forth simple, timely, fit for purpose, and results-oriented products that contribute to learning and accountability in key moments of the OGP action plan cycle.

IRM products are:

- **Co-Creation Brief:** Brings in lessons from previous action plans, serves a learning purpose, and informs co-creation planning and design.
- **Action Plan Review:** A quick, independent 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. This product was rolled out in a transition phase in 2022, beginning with action plans ending implementation on 31 August 2022. Results Reports are delivered up to four months after the end of the implementation cycle.

This product consists of an IRM review of Sweden's 2023-2025 action plan. The action plan comprises four commitments that the IRM has filtered and clustered into two. This review emphasizes its analysis on the strength of the action plan to contribute to implementation and results. For the commitment-by-commitment data, see Annex 1. For details regarding the methodology and indicators used by the IRM for this Action Plan Review, see Section III.

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<sup>1</sup> IRM Refresh: <https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/>

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## Section I: Overview of the 2023-2025 Action Plan

*Sweden's fifth action plan continues to focus on open data. To improve the impact of the commitments, Sweden could make "open by default" mandatory in the public sector and use open data to support anti-corruption reforms, like public procurement, lobbying, and beneficial ownership. The Ministry of Finance should ensure that Sweden meets OGP's Participation and Co-Creation Standards during implementation through regular dialogue with civil society on the progress of the action plan.*

Sweden's fifth action plan (2023-2025) includes four commitments. For Commitments 1 and 2, the government will adopt the International Open Data Charter (ODC) and task the Agency for Digital Government (Digg) with implementing the ODC principles. Commitment 3 involves promoting access to purchasing data, while Commitment 4 will address anti-corruption. The action plan lacks details on the planned activities or milestones for implementation. For example, Commitment 3 does not indicate how purchasing data will be opened, and Commitment 4 does not provide the anti-corruption activities to be carried out.

The co-creation process consisted of two meetings with civil society. The government tasked NOD to organize the first meeting in October 2022, where participants discussed potential topics for the action plan.<sup>2</sup> Stakeholders were identified as civil society organizations (CSOs) with expertise in the chosen theme of (digitalization for an open and transparent public sector). However, some key organizations in the open government field, such as Transparency International Sweden, were not informed in advance. The Ministry of Finance organized a follow-up meeting in February 2023 where it presented the draft action plan.<sup>3</sup> The same stakeholders that participated in the October meeting were invited to the February meeting. During this meeting, the ministry answered questions around the draft commitments but explained that the action plan could not be changed at that time and that the details would be clarified during implementation. For future co-creation processes, the Ministry of Finance could include more follow-up consultations after initial ideas are gathered in order to allow more time for governmental and non-governmental stakeholders to jointly draft the commitments.

The adoption of the ODC, particularly "open by default", has been a priority for Swedish civil society and could send a strong political signal to the public administration on the need for open data. The government may need to pass legislation that obliges the public administration to open certain datasets with sanctions for non-compliance. DIGG should develop a detailed roadmap to guide implementation of the ODC principles and measure its results. DIGG could

### AT A GLANCE

**Participating since:** 2011  
**Action plan under review:** 2023–2025  
**IRM product:** Action Plan Review  
**Number of commitments:** 4

**Overview of commitments:**  
 Commitments with an open government lens: 3 (75%)  
 Commitments with substantial potential for results: 0  
 Promising commitments: 3

**Policy areas:**  
 Carried over from previous action plans:

- Open data

Emerging in this action plan:

- Anti-corruption

**Compliance with OGP minimum requirements for co-creation:** Yes

also offer technical support to local administrations and municipalities working on open data. The IRM also recommends linking open data to the work on anti-corruption under Commitment 4, such as public procurement, lobbying, and political finance.

The Ministry of Finance should ensure that Sweden meets the requirements of OGP's Participation and Co-Creation Standards during the implementation phase. This will entail organizing consultations with civil society at least once every six months and updating Sweden's OGP repository at least twice a year with evidence of implementation. The ministry should also hold at least two meetings with civil society every year to present the results on implementation and collect comments.

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<sup>2</sup> NOD is a third-party organization for dialogue between the Swedish government and civil society. <https://www.nodsverige.se/>

<sup>3</sup> In March 2023, the OGP portfolio in Sweden transferred from the Ministry of Infrastructure to the Ministry of Finance, and from the Department of Digital Policy to the Department of Public Administration. Since the transfer, the point of contact to OGP has been the Deputy Director of the Department of Public Administration.

## Section II: Promising Commitments in Sweden's 2023-2025 Action Plan

The following review looks at the cluster of 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><b>Cluster 1: Open data:</b> The government will adopt the principles of the International Open Data Charter. The government will also task the Agency for Digital Government with implementing the ODC principles and with promoting open access to purchasing data.</p>

**Commitment Cluster 1: Open data** (Ministry of Finance, Agency for Digital Government)  
For a complete description of the commitments in this cluster, see Commitments 1, 2, and 3 in the action plan [here](#).

### Context and objectives:

In the 2022 Global Data Barometer, an international civil society initiative to assess the quality of open data, Sweden ranked among the lowest EU countries.<sup>4</sup> In the European Data Portal's 2022 Open Data Maturity Report, Sweden ranked 18<sup>th</sup> among the EU27+ countries and remained classified as an open data "Follower".<sup>5</sup> In April 2022, the government passed a law that implemented the EU Directive 2019/1024 on the reuse of public sector information.<sup>6</sup> Amendments to the law entered into force in August 2022.<sup>7</sup>

During Sweden's fourth action plan (2019-2022), the Agency for Digital Government (Digg) established a new open data portal and the number of datasets tripled.<sup>8</sup> However, public authorities did not address datasets which were priorities for civil society, such as public procurement. In addition, Sweden did not complete a commitment to adopt a national open data action plan. This draft open data action plan (that was never formally implemented) recommended incorporating the principle of "open by default" into law.<sup>9</sup> DIGG has national principles on how to make information publicly available and a national data strategy, but neither are mandatory.<sup>10</sup>

The commitments in this cluster aim to further develop Sweden's work with open data. Commitment 1 calls for adopting the International Open Data Charter (ODC).<sup>11</sup> Under Commitment 2, the government will appoint DIGG as Sweden's national contact point for implementing the ODC. In this capacity, Digg will develop activities to increase knowledge about the ODC principles. Under Commitment 3, the government will task Digg to promote open access to purchasing data. During the co-creation process, civil society offered feedback on how the commitment on purchasing data could be best implemented. Open Knowledge Sweden is conducting a project around open contracting called "Open Up!" (previously in partnership with Digg) and has identified which parts of government need to be involved.

However, this feedback was not taken into account because the government representatives did not have the necessary time or leverage to expand the commitment to relevant parts of government (such as the National Agency for Public Procurement, the National Financial Management Authority, and the Swedish Space Corporation).<sup>12</sup>

In April 2022 (before the co-creation process started), the government commissioned DIGG to propose how Sweden could adopt the ODC principles.<sup>13</sup> NOD's readout of the consultation meeting on 19 October 2022 mentions discussions around access to purchasing data.<sup>14</sup> While the ODC is not explicitly referenced in this readout, the Ministry of Finance noted that the commitments concerning ODC and tasks to Digg were covered in the discussions around improving accessibility of data, bridging knowledge gaps, and opening purchasing data.<sup>15</sup> Moreover, the adoption of the ODC principles by the government has also been a priority for Swedish civil society for many years.<sup>16</sup>

### **Potential for results: Modest**

According to a representative from Open Knowledge Sweden, the adoption of the ODC principles could send a political signal to the public administration on improving open data practices.<sup>17</sup> However, the representative believes the impact of the ODC will remain limited if the government does not enshrine "open by default" into law. Moreover, a representative of Civic Tech Sweden expressed skepticism about Digg's capacity to fully implement the ODC principles.<sup>18</sup> A data specialist at Digg noted that Digg can only promote the principle of "open by default" but cannot sanction non-compliance, in the current regulatory framework.<sup>19</sup>

On 30 March 2023, the government tasked Digg to implement the ODC principles.<sup>20</sup> DIGG is developing a roadmap for the ODC.<sup>21</sup> Digg will provide guidelines and conduct awareness raising and training for civil servants on sharing and maintaining data. The goal of this project is to change the culture of open data in public administration and avoid a situation where only a few isolated experts work on data. Digg will also organize a "data ambassadors" program for volunteer governmental participants (technical-level officers who work within, or on behalf of, public administration).<sup>22</sup> This program aims to improve the skills of participants so they may support open data within their organizations. Digg was already in charge of open data within Sweden's public administration before the action plan, so the governance has not changed, but the leadership for adopting and implementing the ODC is clearer. According to the representative of Open Knowledge Sweden, it would have been more efficient if the central government had taken the leadership instead of Digg, although the representative also recognized this change would be difficult to implement.<sup>23</sup>

This cluster represents a modest improvement to Sweden's existing policies and practices on open data. The ODC principles provide the public administration a clear framework on how to share and promote data in a way that benefits society. The International ODC also offers Sweden a chance to learn from and collaborate with other national and subnational governments around open data. However, the adoption of the ODC principles does not generate binding or institutionalized changes across public institutions. The OGP action plan does not specify if these principles will become legally binding, nor does it identify how datasets (i.e., on public purchasing) will be opened.

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

Adopting the ODC principles can help the Swedish government move from reactive openness to a proactive “open by default” system where public officials are required to publish data if there is no obstacle to it. Another challenge to implementing the ODC is the General Data Protection Regulation (GDPR). Unlike the ODC, the GDPR is legally binding, and public officials must avoid sharing data that could infringe on the GDPR. Sweden is also highly decentralized, so the responsibility of open data is shared by local administrations. The data ambassador program and the trainings of civil servants (part of the roadmap for the ODC) could help overcome this challenge, but Digg needs to clarify the scope of these programs. Another way to overcome this challenge could be to build bridges between open data work and the anti-corruption work under Commitment 4 in this action plan. Lastly, Sweden’s existing freedom of information (FoI) laws are paper-based, allowing the government to send requested documents to citizens as paper files. This means that there will be two potentially competing frameworks: an existing, legally-binding FoI framework and an emerging, non-mandatory principle of open data. A judgement by the Supreme Court in June 2023 suggests that, under Sweden’s current legislation, the government cannot be required to send documents as open data.<sup>24</sup> The way to overcome this ambiguity would be to legally enforce the ODC principles, including “open by default”.

For strong results during implementation, the IRM recommends the following actions:

- **Release a detailed roadmap for implementing the ODC principles and clarify the scope of the data ambassador program.** As mentioned, Digg is currently developing a roadmap for implementing the ODC principles in the public administration. Digg should release this roadmap as soon as it is ready. Digg could draw on the guidelines from the International ODC for implementing the ODC principles.<sup>25</sup> It will also be important for Digg to clarify how many people will participate as data ambassadors and how many civil servants will take part in the trainings. Digg could establish indicators to measure the impact of these programs.
- **Ensure the national law is in line with the ODC requirements, notably to mandate “open by default”.** The government could consider passing legislation that requires the public administration to open certain datasets with sanctions for non-compliance. For Sweden, it will be particularly important to overcome constraints of the existing paper-based FoI framework by legally mandating the “open by default” principle. For example, France’s Digital Republic Law institutes “open by default”.<sup>26</sup>
- **Support local authorities and municipalities on open data.** Digg could offer technical support to local authorities and municipalities on open data, possibly with the Swedish Association of Local Authorities and Regions. For example, Open Knowledge Sweden has recommended creating a national ombudsperson to represent the public interest in open data practices and a coordination hub on open data for national and local authorities.<sup>27</sup> Germany, another decentralized country, has an Open Data Competence Centre that organizes open data fora and conferences to inform federal, state, and non-government representatives about open data publication.<sup>28</sup> It also supports knowledge sharing through a website which lists data-use cases.<sup>29</sup> Digg could organize similar fora for the data ambassadors and develop a similar repository of data-use cases in Sweden. Digg and the central government could also encourage the adoption of the ODC by regional and municipal governments. For example, in its 2017 OGP Local action plan, the province of Ontario, Canada adopted the ODC for the province’s Open Data Directive.<sup>30</sup>



- **Prioritize opening datasets that support public integrity reforms.** These commitments could set a foundation for eventual legislative changes to mandate publishing key political integrity datasets. The readout from the October 2022 consultation meeting indicates that civil society is interested in improving transparency around public procurement, lobbying activities, conflicts of interests, beneficial ownership, and political finance.<sup>31</sup> For example, data on public sector purchasing could support the creation of a central public procurement database, preferably maintained by the Public Procurement Authority. In addition, legislation could be changed to update the financial data that political parties are required to publish.

### 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.

Under Commitment 4, the Ministry of Finance will develop an anti-corruption action plan at all levels of public administration. The commitment does not specify what activities the ministry will undertake, only that the ministry will communicate the progress of the work. Since the commitment does not indicate the added value or enhanced open government approach in contrast with existing practice, the IRM assesses it as having unclear potential for results. The Ministry of Finance clarified that the decision to develop a new action plan against corruption had, at the time of developing the OGP action plan, not yet been communicated by the government. Therefore, in order to include a commitment in relation to anti-corruption, the ministry had to define it in more general terms.<sup>32</sup> During implementation, the IRM recommends that the anti-corruption action plan cover key areas of public integrity, such as public procurement, lobbying, political financing, and stronger regulation on beneficial ownership transparency. The Ministry of Finance could also integrate anti-corruption work with changes to open data practices from Commitments 1-3.

<sup>4</sup> Global Data Barometer, The Global Data Barometer Report, <https://globaldatabarometer.org/the-global-data-barometer-report-first-edition/>

<sup>5</sup> Open Data Maturity, 2022, Sweden, [https://data.europa.eu/sites/default/files/country-factsheet\\_sweden\\_2022.pdf](https://data.europa.eu/sites/default/files/country-factsheet_sweden_2022.pdf)

<sup>6</sup> Government of Sweden, Ministry of Finance, Making data available in the public sector, April 2022.

<https://www.regeringen.se/rattsliga-dokument/proposition/2022/04/prop.-202122225/>

<sup>7</sup> *Ibid.*

<sup>8</sup> Digg, Sweden data portal, [www.dataportal.se](http://www.dataportal.se)

<sup>9</sup> Open Government Partnership, Sweden Results Report 2019-2022,

<https://www.opengovpartnership.org/documents/sweden-results-report-2019-2022/>

<sup>10</sup> Nationella principer för att tillgängliggöra information, Digg and Data för ett kunskapsbaserat och innovativt Sverige (regeringen.se).

<sup>11</sup> Launched at the OGP Global Summit in Mexico in 2015, the International ODC is an international organization for collaboration between governments and organizations, working to open data based on a shared set of six principles: 1) open by default, 2) timely and comprehensive, 3) accessible and usable, 4) comparable and interoperable, 5) for improved governance and citizen engagement, and 6) for inclusive development and innovation. See <https://opendatacharter.net/>

<sup>12</sup> Information provided to the IRM by Pierre Mesure, Civic Tech Sweden, during the pre-publication review of this report.

<sup>13</sup> Digg, International Open Data Charter, April 2022,

<https://www.digg.se/download/18.6e4b659818475c7636b55e2/1675156660402/Bilaga%20-%20Underlag%20IODC.pdf>

<sup>14</sup> Government of Sweden, Ministry of Infrastructure, November 2022, pg. 7,

<https://www.regeringen.se/contentassets/48a9f871e2af44c081ec39706d97478a/samrad-om-digitaliseringens-mojligheter-for-en-mer-oppen-och-transparent-offentlig-sektor.pdf>

<sup>15</sup> Information provided to the IRM by the Ministry of Finance during the pre-publication review of this report.

<sup>16</sup> Civic Tech Sweden, <https://forum.civictech.se/t/hur-skulle-det-ga-om-sverige-antog-open-data-charter/523>

- <sup>17</sup> Mattias Axell (Open Knowledge Sweden), interview by the IRM, 21 June 2023.
- <sup>18</sup> Pierre Mesure (Civic Tech Sweden), correspondences with the IRM, 30 June 2023.
- <sup>19</sup> Ulrika Domellöf Mattson (Digg), interview by the IRM, 22 June 2023.
- <sup>20</sup> Government of Sweden, Ministry of Finance, Sweden joins the International Open Data Charter, March 2023, <https://www.regeringen.se/pressmeddelanden/2023/03/sverige-ansluter-sig-till-international-open-data-charter-data-fran-offentliga-forvaltningen-gors-mer-oppen-och-lattillganglig/> and mission statement, <https://www.regeringen.se/contentassets/838563dde57c4c069081b786b9f6e6c0/uppdrag-att-ansvara-for-genomforandet-av-open-data-charters-stadga.pdf>
- <sup>21</sup> Medium, Sweden adopts the international Open Data Charter principles, June 2023, <https://medium.com/opendatacharter/sweden-adopts-the-international-open-data-charter-principles-96ebdbbd42>
- <sup>22</sup> Digg, Digg launches data ambassador program to support open data work, February 2023, <https://www.digg.se/om-oss/nyheter/nyheter/2023-02-21-digg-lanserar-dataambassadorsprogram-for-att-stodja-arbetet-med-oppna-data>
- <sup>23</sup> Mattias Axell (Open Knowledge Sweden), interview by the IRM, 21 June 2023.
- <sup>24</sup> <https://www.domstol.se/globalassets/filer/domstol/hogstodomstolen/avgoranden/2023/o-327-23.pdf>
- <sup>25</sup> ODC adoption and implementation roadmap, October 2017, [https://drive.google.com/file/d/1l-Q7Dq\\_M0oRkaqEgPtI7vF3EclfxasjO/view](https://drive.google.com/file/d/1l-Q7Dq_M0oRkaqEgPtI7vF3EclfxasjO/view)
- <sup>26</sup> FieldFisher, France adopts digital republic law, October 2016, <https://www.fieldfisher.com/en/services/privacy-security-and-information/privacy-security-and-information-law-blog/france-adopts-digital-republic-law>
- <sup>27</sup> Open Knowledge Sweden, Open letter: Open data priorities in Sweden, November 2021, <https://okfn.se/2021/11/01/open-letter-open-data-priorities-in-sweden/>
- <sup>28</sup> Open Government Partnership, Germany, Strengthen and socialize open data policy, <https://www.opengovpartnership.org/members/germany/commitments/DE0021/>
- <sup>29</sup> Germany, Open data use cases, [https://www.bva.bund.de/DE/Services/Behoerden/Beratung/Beratungszentrum/OpenData/Use\\_Cases/use\\_cases\\_node.html](https://www.bva.bund.de/DE/Services/Behoerden/Beratung/Beratungszentrum/OpenData/Use_Cases/use_cases_node.html)
- <sup>30</sup> Open Government Partnership, Ontario, Canada, Strengthen Ontario's commitment to making government data open by default, 2017, <https://www.opengovpartnership.org/members/ontario-canada/commitments/ont0001/>
- <sup>31</sup> Open Knowledge Sweden, Open data for political integrity in Sweden: A “non-issue”?, March 2020, [https://drive.google.com/file/d/1MTuKt63Wr\\_bEgLqkYie\\_urbuiV40rZAq/view?pli=1](https://drive.google.com/file/d/1MTuKt63Wr_bEgLqkYie_urbuiV40rZAq/view?pli=1)
- <sup>32</sup> Information provided to the IRM by the Ministry of Finance during the pre-publication review of this report.

## 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 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 the IRM in collaboration with Elsa Foucraut and was externally expert reviewed by Thomas Kalinowski. 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>33</sup>

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<sup>33</sup> IRM Overview: <https://www.opengovpartnership.org/irm-guidance-overview/>

## Annex 1. Commitment by Commitment Data<sup>34</sup>

### Commitment 1: Adoption of the Open Data Charter

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment has been clustered as: Open data (Commitments 1, 2, and 3)
- Potential for results: Modest

### Commitment 2: Special point of contact and implementation of open data principles

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment has been clustered as: Open data (Commitments 1, 2, and 3)
- Potential for results: Modest

### Commitment 3: Purchase data

- Verifiable: Yes
- Does it have an open government lens? Yes
- This commitment has been clustered as: Open data (Commitments 1, 2, and 3)
- Potential for results: Modest

### Commitment 4: Develop work against corruption

- Verifiable: Yes
- Does it have an open government lens? No
- Potential for results: Unclear

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#### <sup>34</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 Sweden's action plan: <https://www.opengovpartnership.org/documents/sweden-action-plan-2023-2025-june/>

## Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the updated OGP Participation and Co-Creation Standards that came into force on 1 January 2022.<sup>35</sup> IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. During this time, IRM will assess countries' alignment with the standards and compliance with their minimum requirements.<sup>36</sup> However, countries will only be found to be acting contrary to the OGP process if they do not meet the minimum requirements, starting with action plans submitted to begin in 2024 and onward. 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.

**Table 2. Compliance with minimum requirements**

Minimum requirement	Met during co-creation?	Met during implementation ?
<p><b>1.1 Space for dialogue:</b> The Ministry of Infrastructure and Digg worked with NOD (a third-party body created by the central government and umbrella organization representing NGOs for dialogue between the Swedish government and civil society) to consult civil society in the development of the action plan. Eleven civil society organizations (CSOs) participated in the first consultation on 19 October 2022.<sup>37</sup> A draft action plan was then discussed in a follow-up meeting with civil society on 22 February 2023.<sup>38</sup> Accordingly, during the co-creation phase, Sweden adhered to the minimum requirement under OGP's Participation and Co-Creation Standards because the space for dialogue met at least once every six months. However, there have been no follow-up meetings since February 2023, as of July 2023.</p> <p>NOD's invitation to participate in the October 2022 consultation included basic information on the purpose of the consultation, the form it would take, and the anticipated follow-up by the Ministry of Infrastructure. The invitation is no longer publicly available on NOD's website, but the IRM confirmed it was available at the time of the co-creation process.<sup>39</sup> It was also available on NOD's LinkedIn page.<sup>40</sup></p>	Yes	<i>To be assessed in the Results Report</i>
<p><b>2.1 OGP website:</b> The government maintains a publicly accessible website for Sweden's OGP process.<sup>41</sup> It contains the latest action plan. It is not clear if this webpage was present before the adoption of the 2023-2025 action plan (April 2023). The Internet Archive first captured a snapshot of it on 9 May 2023.<sup>42</sup></p>	Yes	<i>To be assessed in the Results Report</i>
<p><b>2.2 Repository:</b> Sweden's repository contains readouts from the co-creation consultations in October 2022 and February 2023.<sup>43</sup> It also has press releases on the government's decision to adopt the Open Data Charter (ODC)<sup>44</sup> and to assign Digg the responsibility of implementing the ODC.<sup>45</sup> These press releases constitute evidence for the implementation of Commitments 1 and 2 respectively. The government has not updated the repository since the adoption of the 2023-2025 action plan (8 May 2023).</p>	Yes	<i>To be assessed in the Results Report</i>

<p><b>3.1 Advanced notice:</b> NOD published the invitation to participate in the 19 October 2022 consultation meeting on 29 September. While the invitation is no longer visible on NOD’s website as of July 2023, the IRM confirmed that it was available during the co-creation process.<sup>46</sup> The invitation was also available on NOD’s LinkedIn page. The invitation included a brief timeline of the process, stating that the Ministry of Infrastructure would plan a follow-up meeting about three weeks after the consultation. It also included an overview on the structure of the consultation meeting.<sup>47</sup></p>	Yes	Not applicable
<p><b>3.2 Outreach:</b> In addition to the September 2022 invitation, NOD posted invitations on Facebook on 6 October 2022<sup>48</sup> and on LinkedIn.<sup>49</sup> NOD also reached out to CSOs to participate in the October 2022 meeting. However, some important anti-corruption organizations such as Transparency International Sweden were not contacted by NOD or by the government to participate.<sup>50</sup></p>	Yes	Not applicable
<p><b>3.3 Feedback mechanism:</b> According to the action plan, NOD invited 40 CSOs to the October 2022 consultation and published open invitations on its website and on social media. In February 2023, the Ministry of Finance presented draft commitments to seven participating CSOs, as well as Digg. The February 2023 meeting was held over Skype. The invitation was sent five days in advance and included a list of the four draft commitments.<sup>51</sup> However, at least one civil society representative believed that the ministry could have provided participants with more advanced notice to prepare for the meeting.<sup>52</sup></p>	Yes	Not applicable
<p><b>4.1 Reasoned response:</b> NOD’s readout of the October 2022 meeting lists the topics that participants discussed for the action plan.<sup>53</sup> At the follow-up meeting in February 2023, the Ministry of Finance presented draft commitments to stakeholders. According to the ministry’s readout of the meeting, the draft commitments were chosen based on the proposals from the October 2022 consultation.</p> <p>During the February meeting, representatives from the Ministry of Finance mentioned that the draft commitments could not be changed at that time and that details would be clarified during implementation. However, the ministry provided responses to participants around the proposals for the action plan. For example, the ministry explained that it could not take on additional civil society proposals around purchasing data (Commitment 3) because it did not have the necessary time or leverage to expand the commitment to relevant parts of government.<sup>54</sup> Additionally, the ministry explained that the proposals for a lobbying register and transparency in political party financing were already part of different political processes and could therefore not be included in the OGP action plan.<sup>55</sup></p>	Yes	Not applicable
<p><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.</p>	Not applicable	<i>To be assessed in the Results Report</i>

<sup>35</sup> Open Government Partnership, OGP Participation and Co-Creation Standards, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>

<sup>36</sup> Open Government Partnership, IRM Guidelines for the Assessment of Minimum Requirements, 2022, <https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements/>



- <sup>37</sup> Government of Sweden, Ministry of Infrastructure, November 2022, <https://www.regeringen.se/contentassets/48a9f871e2af44c081ec39706d97478a/samrad-om-digitaliseringens-mojligheter-for-en-mer-oppen-och-transparent-offentlig-sektor.pdf>
- <sup>38</sup> Government of Sweden, Ministry of Finance, March 2023, <https://www.regeringen.se/contentassets/48a9f871e2af44c081ec39706d97478a/uppfoljande-samrad-om-sveriges-handlingsplan-for-open-government-partnership-20232025.pdf>
- <sup>39</sup> NOD, Public consultation, September 2022, <https://web.archive.org/web/20221019152217/https://www.nodsverige.se/samrad-digitaliseringens-mojligheter-for-okad-oppenhet-och-insyn-i-offentlig-forvaltning/>
- <sup>40</sup> LinkedIn, NOD, [https://www.linkedin.com/posts/nodsverige\\_samr%C3%A5d-digitaliseringens-m%C3%B6jligheter-f%C3%B6r-activity-6983754166036795392-4GUR/?originalSubdomain=se](https://www.linkedin.com/posts/nodsverige_samr%C3%A5d-digitaliseringens-m%C3%B6jligheter-f%C3%B6r-activity-6983754166036795392-4GUR/?originalSubdomain=se)
- <sup>41</sup> Government of Sweden, Ministry of Finance, Sweden's action plan for Open Government Partnership 2023-2025, <https://www.regeringen.se/rapporter/2023/05/sveriges-handlingsplan-for-open-government-partnership-20232025/>
- <sup>42</sup> See <https://web.archive.org/web/20230509135659/https://www.regeringen.se/rapporter/2023/05/sveriges-handlingsplan-for-open-government-partnership-20232025/>
- <sup>43</sup> <https://www.regeringen.se/rapporter/2023/05/sveriges-handlingsplan-for-open-government-partnership-20232025/ibid>.
- <sup>44</sup> Government of Sweden, Ministry of Finance, Sweden joins the International Open Data Charter, March 2023, <https://www.regeringen.se/pressmeddelanden/2023/03/sverige-ansluter-sig-till-international-open-data-charter-data-fran-offentliga-forvaltningen-gors-mer-oppen-och-lattillganglig/>
- <sup>45</sup> Government of Sweden, Ministry of Finance, Mandate to be responsible for the implementation of the Open Data Charter, April 2023, <https://www.regeringen.se/regeringsuppdrag/2023/04/uppdrag-att-ansvara-for-genomforandet-av-open-data-charters-stadga/>
- <sup>46</sup> NOD, Public consultation, September 2022, <https://web.archive.org/web/20221019152217/https://www.nodsverige.se/samrad-digitaliseringens-mojligheter-for-okad-oppenhet-och-insyn-i-offentlig-forvaltning/>
- <sup>47</sup> NOD, Public consultation, September 2022, <https://web.archive.org/web/20221019152234/https://www.nodsverige.se/wp-content/uploads/2022/09/bilaga-fragestallningar-och-upplagg-ogp.pdf>
- <sup>48</sup> Facebook, NOD, <https://www.facebook.com/nodsverige/>
- <sup>49</sup> LinkedIn, NOD, [https://www.linkedin.com/posts/nodsverige\\_samr%C3%A5d-digitaliseringens-m%C3%B6jligheter-f%C3%B6r-activity-6983754166036795392-4GUR/?originalSubdomain=se](https://www.linkedin.com/posts/nodsverige_samr%C3%A5d-digitaliseringens-m%C3%B6jligheter-f%C3%B6r-activity-6983754166036795392-4GUR/?originalSubdomain=se)
- <sup>50</sup> Lotta Rydstrom (Transparency International Sweden), correspondence with the IRM, 15 June 2023. Jeremija Isakovic (NOD), interview by the IRM, 21 June 2023.
- <sup>51</sup> Information provided to the IRM by the Ministry of Finance during the pre-publication review of this report.
- <sup>52</sup> Information provided to the IRM by Mattias Axell (Open Knowledge Sweden), during the pre-publication review of this report.
- <sup>53</sup> Mattias Axell (Open Knowledge Sweden), interview by the IRM, 21 June 2023.
- <sup>54</sup> Information provided to the IRM by Pierre Mesure, Civic Tech Sweden, during the pre-publication review of this report.
- <sup>55</sup> Information provided to the IRM by the Ministry of Finance during the pre-publication review of this report.