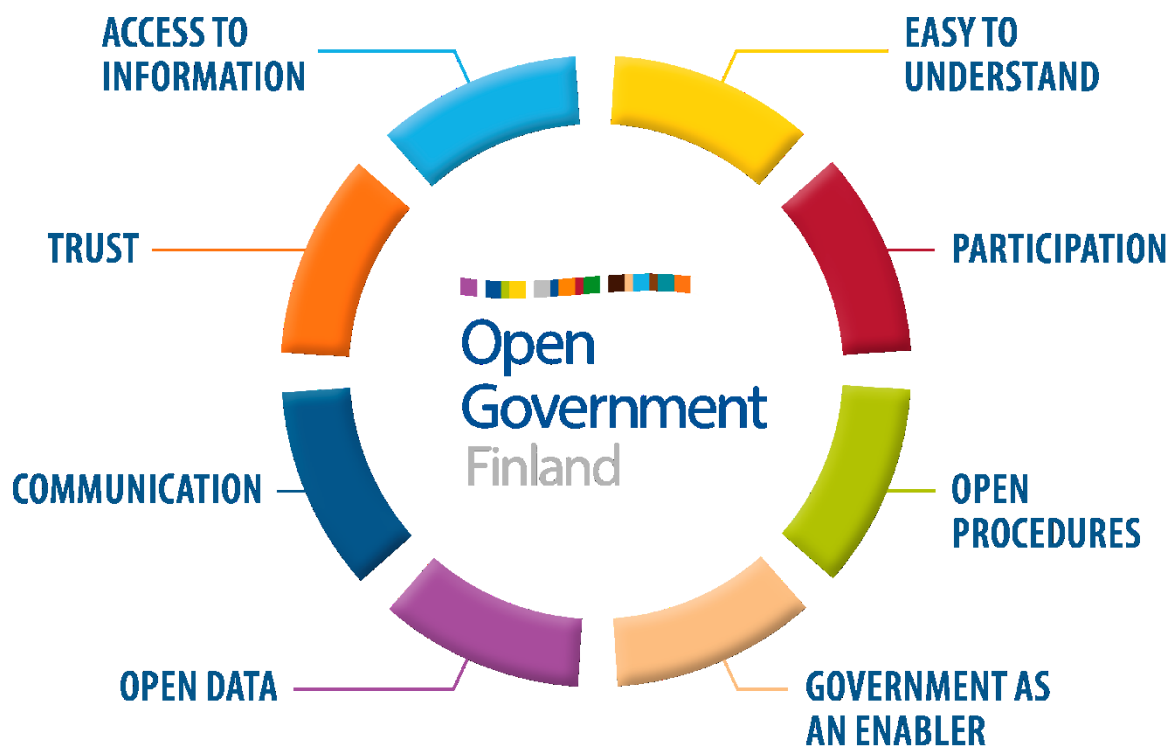


Fourth open government Action Plan

Interim assessment 9/2021



Content

1 Background and drafting process.....	3
2 Progress report on the implementation	4
2.1 Sustainable openness.....	4
Easy to understand – training and support for clear administrative language for everyone	4
Easy to understand – improving easy language skills in government	5
Easy to understand – visualisation	5
Easy to understand - accessibility	6
Participation –CSO Academy	7
Participation – day of the Councils for elderly, day of the Councils for people with Disabilities and day of children’s Rights	8
Strengthening compliance with the Act on the Openness of Government activities.....	9
Openness – support package, openness game, openness training.....	10
Communications – support for leadership commitment	10
Communication – sharing best practices	11
2.2 Open Government Strategy.....	12
2.3 Openness register	12
2.4 Open data	13
3 Need to update the Action Plan.....	14
3.1 Update needs coming from the strategy.....	14
3.2 Equality, children and young people.....	14
3.3 Need for updates arising from OECD reviews	16
4 Open government actors and communications	17
5 Monitoring and indicators	17
6 Summary of the current situation regarding the implementation of the Action Plan	19
Summary of equality and non-discrimination assesment	20

The Action Plan for open Government IV is a four-year action plan from September 2019 to September 2023. The programme includes this mid-term evaluation, on the basis of which the need to update the Action Plan will be assessed.

1 Background and drafting process

All of Finland's open Government Action plans (I-IV) have been drawn up in a process that is as open as possible. The principles of drafting the IV open Government Action Plan were the same as in the previous years (2013, 2015 and 2017). The Action Plan was drawn up as a result of extensive cooperation and consultation. The participants included representatives from CSOs to agencies and municipalities. A couple of new practices were also included in the process of drafting the programme.

The principles of drafting were:

- The preparation process includes face-to-face meetings, workshops and electronic participation opportunities.
- There are various opportunities for participation throughout the process.
- Open systems are utilised in electronic participation opportunities (otakantaa.fi and lausuntopalvelu.fi).
- Face-to-face meetings are arranged for different groups of citizens and public officials. There are meetings both at the Open Government's own events and at events organised by others.
- The aim is to reach participants from outside the Helsinki Metropolitan area as well.

In the drafting process of the IV Action Plan, a memorandum (available only in Finnish) was prepared to support the process. The memorandum described changes in the operating environment and the starting points for drawing up IV action plans. The drafting processes have previously been started without any background note. The purpose of the memorandum was not to steer the end result in any direction but to provide the participants with background information about, for example, what has already been done. The memorandum proved useful. The participants welcomed the concise background that the memo provided.

Issues and views that emerged during the preparation process were recorded in the "What we heard – memorandum" (available only in Finnish) This allowed to record even those issues (for example, why openness is important) that were not proposals for the action plan. The idea for this came from a similar method used in Canada. This proved to be a good way to put together the issues raised. This time, different parties (CSO representatives and public officials) were interviewed separately to support the preparation, in order to reach also persons and CSOs who did not participate in the events. It was also new that three municipal days were organised during the drafting process (in Forssa, Kotka and Jyväskylä), where management and representatives of the city in question as well as local CSOs were met.

The preparation process succeeded well and in the future the basic principles of the process should be similar. Municipal meetings and interviews were a valuable addition to previous processes. The number of interviews could have been higher, but the resources available for this did not allow

more due to resource needs for Finland's Presidency of the Council of the European Union. Similarly, it is advisable to consider organising more meetings with municipalities in the next round as far as possible.

The drafting process is commended both by the OGP independent Research mechanism (IRM) and in the OECD's assessment of civil society's operating conditions. ("the Ministry of Finance's Publishing of tracked changes to its 2019-2023 open Government Action Plan on its open government website is commendable.")

However, the IRM draws attention to the need to further develop the monitoring indicators of the programme. About developing monitoring and indicators separately in Chapter 5.

2 Progress report on the implementation

The Action Plan for Open Government IV contains four commitments. This interim review examines what has been done in respect to different commitments and whether updating the objectives, commitments and measures is necessary.

2.1 Sustainable openness

The commitment to sustainable openness consists of several sets of measures. The commitment should be updated with the objectives of to strengthen dialogue and understandability that are in the Open Government Strategy published in December 2020. More about this update in Chapter 3.1.

Easy to understand – training and support for clear administrative language for everyone


An online course on clear administrative language has been produced. The course has been integrated into the orientation training of new officials at the ministries. In addition to the online course on the use of clear official language, the Institute for the languages of Finland is currently preparing more extensive online study material on the use of official language. The last part of the training package will be completed during 2021. The online course is open to everyone free of charge. The first course on clear official language has now also been open to everyone, as its use had previously been restricted to government officials only.

The Open Government project was involved in selecting the winner of the year's 2020 award for use of clear language. The prize was awarded for clear administrative language to the working group on clear language training at the Regional State Administrative Agencies and to the working groups on the website reform. The importance of clear language has been communicated by providing information about the selection process and the recipient of the prize. Fifteen candidates were received for the competition in 2020. Their work also provides other authorities with examples of promoting clear administrative language.

According to a survey addressed to the agencies in 2020, 58% of the organisations had taken measures to clarify the language.

The course has been completed. The implementation letter sent to the agencies and the implementation of the programme have been widely marketed. At the end of 2021, a round of meetings will be organised with all administrative branches on open government implementation. In these meetings it will be further emphasised that there will be monitoring of the number of attendees per agency.

Easy to understand – improving easy language skills in government



In addition to clear language skills, it is important that the administration also has more information and skills in easy language. It is estimated that as many as 700,000 people in Finland need easy language (Finnish Centre for easy language 2019). Strengthening easy language is one of the objectives of Finland's Open Government Strategy published in December 2020. It aims to promote everyone's right to understand and be understood.

The plain language policy of the Finnish open Government Strategy was presented to the Advisory Board on easy language in spring 2021. The objective is to produce online training on easy language and together with the Advisory Board and the easy language Centre. The training will be supported by info material.

The clear language award of the year is awarded for clear language and easy language in alternate years. In 2021, it was a turn for easy language, and the prize was awarded to Communications teacher Soilimaria Korhonen from Savonia University of applied Sciences. The Finnish Institute for Health and Welfare's easy language information on the coronavirus and Yle Nyheter magazine Svenska, the Swedish language magazine of the Finnish Broadcasting company YLE, received an honorable mention. On 28 May, the International day of easy-to-read language was celebrated, and the prize was awarded at the main event in Europe, which was held as a remote event.

Municipal elections were held in Finland in June 2021. The Ministry of Justice, in cooperation with the Finnish Centre for easy language and the LL-Centre, published electoral brochures in easy-to-understand language and also drew up videos in easy-to-understand language on voting. These and other information on the elections in easy language can be found on the website of the Finnish Centre for Easy language.

In a survey conducted in 2020, only two agencies reported that they had easy language material on all their topics and 19 reported that the material contained in some areas. 63 agencies did not have any material in easy language.

An e-course on easy language has not yet been organized. Planning has begun. As well as the production of the related material. Easy language is a priority in the open Government Strategy, so the objective will be updated.

Easy to understand – visualisation



The visualisation support card is being updated. The e-learning platform has provided visualization training since 2020. Better visualization of information is also promoted in many other contexts, such as the ongoing Tietokiri project.

The preparation of the visualisation support package will begin after the update of the entire support package for open government has been completed. A visualisation support package with the presentation of good practices, presenting a concise presentation of the support package for open government.

Easy to understand - accessibility

The Act on digital services obliges different authorities and other actors to take accessibility into account in their digital services. Accessibility means taking into account people's diversity and diversity in the planning and implementation of online services. (the Act on the provision of digital services entered into force on 1 April 2019.)

The Action Plan includes a commitment to improving the accessibility competence of public officials. Ensuring an increase in the accessibility competence of public administration so that understandable and clear content emerges in public online services. Together with Celia, a short course will be arranged in eOppiva (web learning portal) on the connection between accessibility and plain content.

The Open Government survey addressed to municipalities and government agencies in September 2020 highlighted that attention has been paid to accessibility.

At the events of different sectors, information on accessibility legislation has been provided and further measures have been specified. Agencies and cities have organised accessibility training and established accessibility teams responsible for accessibility issues.

The accessibility of the website is continuously developed to make it easier to find and access information. The website has also been developed so that users can give immediate feedback on specific issues.

The staff will be provided with short infos that highlight the accessibility of documents and provide guidance on the accessibility of documents. The aim of communications is to provide clear administrative language. In general, increasing digitalisation in services increases the implementation of the principles of open government.

Accessibility and its significance were brought up in the discussions held in connection with the regional tour around Finland in 2020. An effort is made to take accessibility into account in daily activities, text is produced with audio and videos are subtitled.

Accessibility training is available on the eOppiva website. Celia organises open training on *accessible documents online* and provides other training related to the topic (*accessible documents online in accordance with the requirements of the digital services Act and how to make an accessibility statement*).

An accessibility network has been set up for the ministries by the government. The aim of the network is to raise awareness of accessibility, provide opportunities to consider solutions together and share best practices among the ministries.

Information and instructions on the accessibility of online services and communications are available on the Saavutettavasti.fi website produced by the Celia.

Information on the accessibility requirements of legislation is available on the saavutettavuusvaatimukset.fi website of the Regional State Administrative Agency.

Participation –CSO Academy

The purpose of the Academy of Finnish CSOs is to provide actors in the administration with better knowledge of the activities of CSOs and to help public officials to establish contacts with CSOs in their own field of work. The CSO Academy supports the Government Programme's objective of increasing civil society expertise in the administration. The schedule in the action plan for organising the pilot was 2020 and establishing the format in 2021. The indicators included the creation and implementation of the CSO Academy and the monitoring of the number of participants and feedback from participants.

The Open Government project has organised two CSO Academy events in cooperation with CSOs and the Ministry of Justice on 1 October 2020 and 25 March 2021. The third CSO Academy will be held on 1 October 2021.

A planning group has been established for the CSO Academy in addition to the open Government project of the Ministry of Finance and the Ministry of Justice, it has included 7 civil society organisations: Citizens' Arena, Mannerheim League for child Welfare (until spring 2021), Martha Organization, Finnish Federation of the visually impaired, Finnish national Youth Council Allianssi, Finnish Red cross and the Finnish Union of Senior Services VALLI ry. Since spring 2021, the planning group has also had a representative from the funding Centre for Social Welfare and Health organisations (STEA). In the planning group, the following objectives have been set for the Academy of Finnish civil society organisations: The aim of the Academy is to strengthen public officials' knowledge of CSO activities and to increase mutual understanding, dialogue and networking between public administration and CSOs. In addition to the general seminar and training share, the Academies for CSOs are built on joint dialogue discussions between the administration and organisations, where topics of current interest and opportunities for cooperation are discussed openly and equitably. The purpose of the dialogues is to increase mutual understanding and strengthen cooperation.

The CSO Academy is becoming established as an annual event, and it is being expanded to regional events as well. The events have attracted plenty of participants. The number of participants in the 1st event was 153 and in the 2nd event 142. The events have reached a growing number of representatives of public administration and civil society organisations. The feedback from the participants has been very positive. None of the feedback providers has been dissatisfied with the content or arrangements of the events. 19 % were fairly satisfied with the content of the first event and 81 % very satisfied with the arrangements, while 50 % were fairly satisfied and 50 % were very satisfied

with the arrangements. 31 % were fairly satisfied with the content of the second event and 69 % were very satisfied with the arrangements, 28 % were fairly satisfied and 72 % were very satisfied with the arrangements. Written feedback has also been very positive and encouraging.

Summaries of the events of the Academy of Finnish civil society organisations have been drawn up and their materials have been published on the open Government website. A blog on the Academy of Finnish non-governmental organisations has been published in cooperation between the open Government project and VALLI ry. Information about the Academy has been actively communicated, for example, in newsletters and social media as well as in organisations' forums. The Academy of Finnish civil society organisations has been taken into account internationally, for example in the OECD review on civil society's opportunities for action in Finland. The brand of the Academy of Finnish non-governmental organisations has been strengthened by creating the logo in Finnish, Swedish and English. The commitment to sustainable transparency in the Action Plan emphasises paying particular attention to the participation opportunities of the most vulnerable groups. Vulnerable people and the silent voices of society have been taken into account in the programmes of the CSO Academy, in which they have been given special weight both in addresses and in the choice of themes for the dialogues.

Similar regional events are also being planned. They will be organised in regional cooperation.

Participation – day of the Councils for elderly, day of the Councils for people with Disabilities and day of children's Rights

For several years now, Open Government together with organisations for older people has organised a day of the Council for older people. In 2021, a similar event will also be piloted for disability councils. This is the first time that it will be organised as a separate event, but in the future it may also partly take place together with the day of the Councils for older people. It is important that representatives of the disability councils have more opportunities for national exchange of experiences, information and joint development. The planning of the first day of the disability Council is under way in cooperation with the Advisory Board for the Rights of persons with Disabilities VANE. The event will be held on 22-23 November 2021 on two evenings. Its themes are the status, activities and opportunities of influence of the disability councils as well as regional reform and health and social services: what will happen in municipalities in the future. The themes were selected on the basis of a survey addressed to the disability councils in spring 2021. The respondents were asked to give their wishes and views on the topics and implementation method of the disability Council day pilot. Replies were received from 72 disability councils. (under the Act, each municipality is obligated to establish a Council on disability. The disability Council can be shared by several municipalities. There are currently 309 municipalities in Finland).

The 2019 and 2020 Councils for older people were organised in cooperation with the open Government project, Valli ry, the Finnish age Institute and the Finnish Association for the Welfare of older people, the Ministry of Justice, the Human Rights Centre and the UKK Institute.

The theme of the annual meeting of the older people's Council held in Helsinki on 7 November 2019 was "Council of the elderly" on behalf of the entire older population – safety, services and good daily life". The morning's programme focused on security and electronic services. The afternoon theme was good everyday life and inclusion. In 2019, around 140 members of the councils for

older people from different parts of Finland attended the event. Approximately 90 different parties took part in the remote connection, many of which included the entire older people's Council.

The day of the Councils for older people, "older people as a resource in society", was held in October 2020 in an online seminar due to the coronavirus pandemic. In 2020, 86% were satisfied with the content of the day and 14% were fairly satisfied, which is 100% in total. There were no dissatisfied with the content among the respondents. 97 % were satisfied or fairly satisfied with the arrangements. There were 72 respondents.

The 2021 Councils for the elderly day will be held in November. The theme of the event is the path back to a better everyday life – older people's councils will play an influential role between older people, organisations and authorities.

In addition to the days of the national Council on ageing and disability, the Open Government organises an annual day on child rights in cooperation with the Office of the Ombudsman for children and the Mannerheim League for child Welfare. The event is for experts, law drafters, public officials and decision-makers.

The UN Convention on the Rights of the child celebrated its 30th anniversary in 2019, and the theme chosen for the anniversary year was "child budgeting as a tool for promoting the rights of the child". Child budgeting means examining the budget from the perspective of the rights of the child across administrative and sectoral boundaries. The day before Open Government took part in a Government wide event called "Children take over the government". The summary of this event's proceedings was submitted to the Chancellor of Justice. The Chancellor of Justice brought this summary's greetings to the Open Government Child Rights event. The feedback from the participants of the 2019 event was positive.

In 2020, the theme was "children, the coronavirus and the economy". The day on child rights examined the coronavirus pandemic from the perspective of children and the economy. The coronavirus pandemic can be expected to have several negative impacts on the wellbeing, health and learning of children and young people, both in the short and long term. Many of the long-term consequences for children and young people are conveyed through families' lack of financial resources. The effects of the coronavirus crisis may also extend to families that cope well in the past and to the generations that have not yet been born. The seminar explored the short and long-term impacts of these impacts and what should be done to prevent them. The feedback from the participants attending the the 2020 event was positive.

Strengthening compliance with the Act on the Openness of Government activities

The Ministry of Justice has begun the work to update the Act on the Openness of Government activities. The principle of openness laid down in the Constitution is mainly implemented through the Act on the Openness of Government activities (621/1999; Act on the Openness of Government activities). The current legislation on the openness of government activities will be updated with the aim of achieving clearer and more effective legislation that promotes openness in society and meets the requirements of today's society. The task of the working group is to examine and assess 1) the problem areas in the appropriate implementation of the principle of openness and the measures af-

fecting them, and 2) the sufficiency and timeliness of the scope of application of the Act on Openness, particularly taking into account the renewable structures of public administration. The term of the working group is 22 January 2021-30 June 2023.

Openness – support package, openness game, openness training

A support package for open government is being prepared, and the expected completion date is October 2021. The material in the support package will cover all eight areas of open government work. The support package also serves as a basis for openness training. The contents of the support package were discussed in the open Government working group 3/2021. The new concept and the contents based on it were discussed in the network of public servants in open Government 4/2021.

The Swedish version of the openness game has been completed. A version of the online game will also be implemented. The design of the online game is under way and the estimated completion date is at the end of 2021. Due to the coronavirus pandemic, the marketing of the openness game has been postponed and will be connected to the marketing of the coming online version. After the online game has been completed, there will be information and marketing of both the online game and the platform version.

The aim is to publish the training in early 2022, and it will also be available to local government officials, elected officials and non-governmental organisations. The purpose of the training is to provide the public officials with a basis and means to support them in acting as openly as possible in their official duties. The training is also provided in Swedish.

Communications – support for leadership commitment

A regional tour of open government and its leadership was launched in spring 2020. During the spring and autumn, a total of eight events were organised for the leadership of cities, municipalities and central government agencies in the regions. Three of the events (Tampere, Salo, Oulu) were organised as face-to-face events, but the rest were transferred to the autumn due to the coronavirus pandemic and organised as online events (Mikkeli, Kuopio, Jyväskylä, Oulu and Rovaniemi. The latter also partly as a face-to-face event). The key objectives of open government were discussed at the events. However, the events focused strongly on discussing the importance and opportunities of open government and its management in municipalities and government agencies. The aim of the events was to understand what municipalities and government agencies hope to achieve together in the development of openness and leadership. Another objective was to give the participants the opportunity to clarify their joint understanding of the common and their own objectives on open government and how they can be achieved. The dialogues in the regional events were organised using the #Timeout Dialogues method. The summaries of the discussions were used in the preparation of the open Government Strategy and in the OECD Trust review of the Finnish government.

Of the participants 97 % of the were satisfied or fairly satisfied (76.5 % satisfied); 3 % were not satisfied.

Communication – sharing best practices

The Open Government Action Plan does not cover all open government work carried out by the state and municipalities. Openness is promoted on a broad front every day. During the programme, efforts are made to disseminate information and good practices and to support also all other work on open government that is not directly reflected in the commitments of the programme.

The collection of good practices from the public administration is a continuous activity in the Open Government project. Good practices will be included on the open Government website in the section experiences. On the website, experiences of good practices are divided into five themes: understandability, inclusion, open activity, administration as an enabler and open data. Good practices are structured on the experience website by questions: What was done and why? What was achieved? What will be done in the future? and More information.

Good practices have been requested in open government newsletters 6/2020 and 3/2021. Six new experiences were added during the fourth Action Plan by May 2021. In addition, the cards for hearing children and young people have been updated. Other previous experience and information cards have also been updated and their own pages have been made available on the Open Government website under experiences. In the future, more good practices will be asked for in the open Government newsletter, and the Ministry of Finance's Open Government Team will draft new good practices derived from the measures of the open Government project. Efforts will be made to actively increase the number of published good practices.

2.2 Open Government Strategy

[The open Government Strategy](#) was prepared throughout 2020. This was associated with the “Building trust” regional tour, information obtained through the Lockdown Dialogues, many other events and background materials. The political steering group for reforming public administration adopted the strategy at its November meeting in 2020, and the strategy was published on 9 December 2020.

The strategy contains a long-term vision and key priorities for open government. The vision and priorities guide the preparation and implementation of open Government Action plans. The strategy will strengthen the consistency and effectiveness of the promotion of open government in public administration. The strategy supports cooperation between open government sectors and levels and implements the OECD’s Open Government Recommendation.

The priorities of the strategy are 1) open government strengthens dialogue in society 2) open government promotes everyone’s right to understand and be understood 3) leadership and competence ensure everyone’s opportunity for participation 4) Finland is an active promoter of open government internationally.

The IV Action Plan will update the new focus areas emerging from the open Government Strategy. Dialogue work, especially increasing the competence and use of the dialogue in the public sector, will emerge as a new commitment in the action plan. This work was already started hand in hand with the preparation of the strategy. Read more here in Section “3.1. Update needs coming from the strategy”.

2.3 Openness register

The Government appointed a parliamentary steering group and an expert working group for the preparation of the statutory openness register referred to in the Government Programme of Prime Minister Marin’s Government for the term of 12 March 2020-30 June 2021. Due to the transfer of the municipal elections and the pressures related to the timetable of the health and social services reform to Parliament, a thorough discussion and finalisation of the report by the steering group has required an extension of the term until 31 October 2021.

According to the appointment decision, the preparatory bodies are tasked with preparing a proposal for a statutory openness register (lobbyist register) to be established in Finland that imposes a registration obligation on organisations and individuals engaged in lobbying activities.

In accordance with the work plan drafted in spring 2020, the themes and questions referred to in the appointment decision have been discussed in the preparation. To support the discussion, extensive stakeholder workshops have been organised and two studies on the current state and prevalence of lobbying have been carried out.

In spring and autumn 2021, the expert working group will work on a proposal for an openness register in the form of a government proposal, based on the guidelines made by the steering group on

15 February 2021. The draft report drawn up by the expert working group will then be discussed by the steering group before being handed over to the Ministry of Justice and sent out for comments at the end of 2021. After this, the aim is to submit the progress to Parliament in spring 2022. The act is expected to enter into force and the electronic register into use in 2023.

2.4 Open data

An important reform of regulation on open data has been the Directive on open data and the re-use of data held by the public sector (EU) 2019/1024, i.e. the open data Directive, which was adopted on 20 June 2019. This is a recast version of the PSI Directive (EC) 2003/98. In spring 2020, the Ministry of Finance set up a project to prepare the national legislation required by the Directive. Based on the project and the work of the working groups appointed for it, the Ministry of Finance submitted a government proposal to Parliament in May 2021. The government proposal was approved by Parliament on 23 June 2021, and the legislative amendments entered into force within the deadline set in the directive on 17 July 2021.

The open data Directive has resulted in amendments to the Act on information management in public Administration (906/2019; amendment Act 710/2021) and the Act on the Openness of Government activities (621/1999; 711/2021). The amendments have ensured the availability of dynamic data and valuable datasets defined in the Directive as required by the Directive. For example, valuable data sets must be available free of charge and through application programming interfaces (APIs). In addition, the Act on the re-use of information by companies providing certain services of general interest (712/2021) and the Act on the re-use of Research materials produced on public funding (713/2021) have been enacted. These new provisions took into account the expansion of the scope of application of the open data Directive from the previous PSI Directive to certain publicly owned companies and research materials.

The implementation of the Directive requires not only legislation but also concrete measures to meet the requirements of both the Directive and the new national legislation. However, it has not been possible to take these measures because the European Commission has not issued any complementary regulation defining what the valuable data sets are and how they should be made available. When the Commission issues this regulation, it is not known at the time of writing.

The opening, availability, utilisation and quality of public data have been promoted especially in the project on opening up and using public data, which was set up by the Ministry of Finance in spring 2020. The project implements the Government Programme's objective of deepening the management of information policy. In the course of the project, a proposal for the strategic objectives for opening up and utilising information was drawn up in broad-based stakeholder cooperation, and a roadmap is still being prepared alongside these. A government resolution on the strategic objectives is presented. In addition, a user-oriented operating model has been prepared for the more systematic sharing of public information either as open data or for wider use, primarily via programming interfaces. Quality criteria for information have been created under the direction of Statistics Finland, and a quality framework with indicators is still being prepared to support the rollout. In addition, national API guidelines for public administration have been drawn up to support information administrators in the technical distribution of information and improvement of interoperability. Alongside the API guidelines, implementation guidelines and a management model will be prepared to

support the implementation. The project will also support the promotion of semantic interoperability of data and the implementation of the above mentioned open data Directive. The project measures, which will continue until the end of 2022, are in line with the current legislation and support the formulation and implementation of information policy.

3 Need to update the Action Plan

3.1 Update needs coming from the strategy

The Open Government Strategy has four priority areas: 1) open government strengthens dialogue in society 2) open government promotes the right of everyone to understand and be understood 3) management and competence ensure everyone's opportunity for involvement 4) Finland is an active promoter of open government internationally. These will be prioritised in open government activities in the coming years, and the action plan will be updated on this basis.

To strengthen dialogue in society, the strategy aims to make the dialogues a stronger way of operating in government and to strengthen interactive professional skills in the public sector. This will be included in the Action Plan as a new commitment number five.

Work to develop the competence and use of dialogues is already under way. During the IV open Government Action Plan period Lockdown Dialogues have been implemented. The research cooperation and dialogues carried out are also part of the measures for participating in the open Government #HyvinSanottu (#WellSaid) campaign. Dialogues have also been organised as part of various open government events (day of the Council for older people, CSO Academy, etc.).

The Easy to understand -priority area of the strategy emphasises a systematic and proactive increase in the skills and number of easy Finnish and easy Swedish (a language that is even easier than clear language) in public sector organisations. The objectives of plain language will also be specified as part of the update of the Action Plan.

The strategy also emphasises Finland's role in the international work on open government. Finland has been an active supporter of the OECD's open government work and the chair of the working group is Finnish. Similarly, Finland has been active in open Government Nordic+ activities, which is an important exchange of information and experiences between the reference countries.

3.2 Equality, children and young people

An evaluation of equality and non-discrimination in the Action Plan was also carried out as part of the mid-term evaluation. A summary of the evaluation is appended to this evaluation report.

Open government commitments promote everyone's inclusion and thus also equality. However, there are no specific commitments or measures for gender equality. The objective of the commitment to sustainable openness is to add a section from the perspective of equality to the support package for open government. The preparation of an Open Government Strategy is one of the commitments of the Action Plan. The strategy has been completed and includes the objective of promot-

ing the inclusion of the most vulnerable groups as part of promoting the inclusion of all. No objectives concerning the status of women, girls or women's organisations have been specifically written in the commitments. The Action Plan does not otherwise mention different groups, either, but emphasises the inclusion of all and those in a particularly vulnerable position. No separate data or information describing the share of women has been published in the follow-up to the Action Plan. In the implementation of the commitments, no particular focus has been placed on women's opportunities for participation; instead, it has been part of the objective of reaching as wide a variety of participants as possible.

Two of the areas of development highlighted in the evaluation in Finland's operating environment emerged in particular. In order to promote the inclusion of all, more emphasis should be placed on accessibility both in general administration activities and at the events and activities of the open Government Programme. Another priority for updating the Action Plan is to correct the situation that information on the work of open government is not available in the Sámi languages. On the other hand, adding separate quotas or earmarked funds to the Action Plan is not considered in this respect as the centralized funds are very limited.

When evaluating the role of children's and young people's inclusion in the open Government Programme, it is worth mentioning that Allianssi and the Mannerheim League for Child Welfare participate in the open Government working group. They have also been involved in the planning and implementation of the pilot project of the CSO Academy and in the subsequent Academies. During this programme period, two topical days on the rights of the child have been organised in cooperation with MLL and the Office of the Ombudsman for children. The theme of child budgeting in 2019 was linked to the budget process, which is one of the key administrative processes. In 2020, the theme was "children, the coronavirus and the economy", which examined the short and long-term impacts of the coronavirus crisis on different kinds of children and families with children and how these could best be prevented.

In 2019, the UN Convention on the Rights of the child celebrated its 30th anniversary, in honour of which a "children take over the Government event" was organised under the leadership of the Prime Minister's Office and in cooperation with different ministries and non-governmental organisations. A hundred 5-17-year-old children attended the event. Fifteen ministers, the Chancellor of Justice, the Deputy Parliamentary Ombudsman and public officials took part in the workshops with the children. The Open Government project was also involved in organising one of the workshops at the event. The summary of the event was handed over to the Chancellor of Justice, who also brought it to the event on the following day.

In 2020, open Government information cards on hearing children and young people were updated in cooperation with the Finnish national Agency for Education and the Finnish national Youth Council Allianssi. The need for updates was also discussed in the DINO network, where different experts, including All Youth research project. Updated fact sheets are available on the avoinhallinto.fi website. The open Government project has had its representative in the DINO network, and its representatives have also participated in the workshops and events organised as part of the All Youth research project.

Open government has been registered as an organisation in the nuortenidea.fi service. From the government only the Ministry of Justice, the Ministry of Education and Culture and the Ministry of Defence are there.

3.3 Need for updates arising from OECD reviews

Two reviews commissioned by Finland from the OECD were published in 2021 as part of the open Government work. The OECD Trust Review was published in May and provides up-to-date information on citizens' trust in government and public institutions in Finland and gives recommendations on how government can develop its activities to strengthen and maintain citizens' trust.

The second OECD review was published in June 2021 Civic Space Scan of Finland. The assessment covered laws and practices, civil rights, the operating possibilities of the media, the changes brought about by digitalisation, the operating possibilities of civil society organisations, and the participation of citizens and non-governmental organisations. The evaluation provides information and recommendations that help protect and promote civil society's opportunities for action in Finland. Finland is the first OECD Member State to undergo such a scan. A citizens' Panel was also part of the scan. The citizens' Panel was organised at the beginning of the year and it issued recommendations on measures that should be taken in Finland to protect people in the public sector from hate speech and to safeguard free expression of opinion.

A working group was set to review the recommendations of both the reviews in a cross-sectoral working group. The working group will review the recommendations and find out which of them could be promoted in existing programmes or projects, and which, in turn, require new projects, preparation or further studies.

4 Open government actors and communications

Open Government Actors Public Sector

In Finland the open government work is for the whole public sector



VALTIOVARAINMINISTERIÖ

Ministry of Finance coordinates the OGP work. The national OGP team is in the MoF.



Kansalaisyhteiskuntapolitiikan
neuvottelukunta

The Civil Society Policy Board is in the Ministry of Justice.



Open Gov Working Group

The role of the group is to support the implementation of the action plan.



Open Gov Network

Members represents state agencies.

Municipal Democracy Network

is an open network developing and strengthening democracy in municipalities.

The newsletter on open government is published once a month, with the exception of July. Another key means of communication is the website: avoinhallinto.fi. They are being developed continuously, and a blog on open government has been launched on the website during 2021. The aim is also to actively communicate about the newsletter, events and blogs on social media.

5 Monitoring and indicators

In accordance with the IRM recommendations, the monitoring indicators of the Action Plan will be updated. A general framework may be presented for the evaluation of the programme, in which:

- Relevance - describes the relationship between needs and objectives
- Impact - describes the relationship between objectives, results and impacts
- Benefits and sustainability - describe the relationship between needs and impacts
- Efficiency - describe the ratio of inputs and outputs

In the management and monitoring of the programme, it is important that the objectives, resources and timetables are closely linked to each other and that changes in one factor are taken into account in other factors. The objective is for the monitoring of the action plan to include the following points (activity-level indicators):

- classification of measures by commitment, for example? (see the classification below)
- resources the responsible party, appropriations allocated to measures, and human resources (person-years)
- schedule as a time resource and progress of the programme
- outputs immediate achievements in the implementation of the Action Plan

The four-tier classification is used to monitor the measures:

0. Not launched
1. Plan completed.
2. Implementation in progress
3. Measure implemented.

The outputs of the Action Plan are the direct results that can be clearly verified. They can be controlled by those responsible for the implementation of the Action Plan, and the efficiency of implementation can be examined as a relation between resources and outputs.

The outputs documented are indicators for the implementation of the programme and they include:

1. Legislation and norms
 - Government proposal, laws, decrees, decisions
2. Guidelines and operating models
 - quality criteria, ethical guidelines, statements, interpretations of the application of legislation (written)
3. Development tools and support
 - e. g. open government game, expert support, support packages
4. Organised stakeholder cooperation and networks
 - number and representativeness of members, hearings, statements, feedback (names/brand of actors)
5. Seminars and other events
 - events programmes prepared and implemented, number of participants, participation of different stakeholders, feedback/sentiment indicators
6. Training and education programmes
 - programmes developed and implemented, number of participants, feedback on courses, course performance
7. Information services
 - registers, material and information about good practices, use and user feedback
8. Publications, writings and other communications
 - reports, writings for the media, lectures, speeches, interviews, visibility in social media, websites, etc. (incl. number of posts and estimated quality, clicks, etc.)
9. Studies, surveys and inquiries

Implementation indicators are part of the monitoring of the programme. Various impact indicators describing the development of open government (outcome-level impact indicators) can also be used in the decisionmaking, planning and evaluations of the programme. These must be essential and clearly linked to the state and development of open government. Reliable indicators have a research link and a strong data base. The OECD is developing an open Government Index, which will also be used to monitor the development of open government in Finland.

6 Summary of the current situation regarding the implementation of the Action Plan

Commitment 1 Sustainable openness

Easy to understand – training and support for clear language

Easy to understand – easy language

Easy to understand – visualization

Easy to understand – Accessibility

Participation – CSO Academy

Participation – day of the Council for Elderly, day of the Council for People with Disabilities

Strengthening compliance to access to information legislation

Openness – support package, openness game, openness training

Communication – support for leadership support

Communication – Sharing Best Practices

Commitment 2 Open Government Strategy

Commitment 3 Openness register

Commitment 4 Open Data

AMNEX

Summary of equality and non-discrimination assesment

A total of 43 points

WHERE ARE WE STRONG? 23 points (resume)

- The right for everyone to participate is included as a central goal in all open Government programmes, processes and operating methods.
- There has been a possibility for everyone interested to participate in the preparation process of the Action Plan.
- Information on the open Government work and programme has been disseminated openly.
- There are also events outside the Helsinki Metropolitan area.

WHAT NEEDS TO BE DEVELOPED? Paragraph 11 (resume)

- All key documents of open government (strategy, action plans, the areas of , etc.) include the aim of involving everyone and, in particular, improving the inclusion of those in a relatively weaker position. However, not everyone specifically mentioned the issue of equality.
- The strategy and action plan (implementation letter) have been sent to all agencies and municipalities. In addition, they have been actively disseminated and publicised, and they are available for everyone on the website. There has been no separate orientation to the equality connections between the programme and the process.
- The open Government working group does not include women's organisations. When the group was put together, discussions were held with the national Council of women of Finland that they do not think there is a need to be members of the working group but that other contacts are sufficient. The door to the working group is also always open if a re-evaluation is needed.
- Information on the Action Plan and its value is disseminated to CSOs, but not separately to women's organisations. They are involved in the general distribution of information and invitations.
- In the preparation of the Action Plan, a discussion/interview was held with a representative of the national Council of women of Finland, but no separate event on the equality content of the Action Plan was organised.
- The needs of different participants have been partly taken into account in the venues where meetings and events are organised (accessibility, possible restrictions on women's mobility).
- The aim is to include groups that represent the groups that are relatively in a weaker position but there are no quotas.
- Regional events have been organised and grass-roots organisations have been invited to them, but there are no specifically earmarked resources for this.
- Information is distributed in Finnish and Swedish, but it does not exist in the Sámi languages.

WHICH AREAS NEED SIGNIFICANT ATTENTION? Section 9 of the evaluation

- The Action Plan or its drafting template do not include minimum standards for equality.
- The Action Plan does not include a standard section on how gender equality and inclusion issues have been supported in the process of the Action Plan.

- There is no proactive support available or expert or technical assistance on gender equality and inclusion for the participants during the preparation process of the Action Plan.
- There are no earmarked resources to pay for the participation of marginalised groups (e.g. activists' travel expenses).
- There are no goals or quotas for gender equality experts, women activists and women's rights organisations in forums and groups.
- No feedback is given on how equality and inclusion have been incorporated into the draft commitments and the entire programme in the joint development of the Action Plan with CSOs and citizens.
- There is no separate breakdown of the indicators (age, gender, etc.)