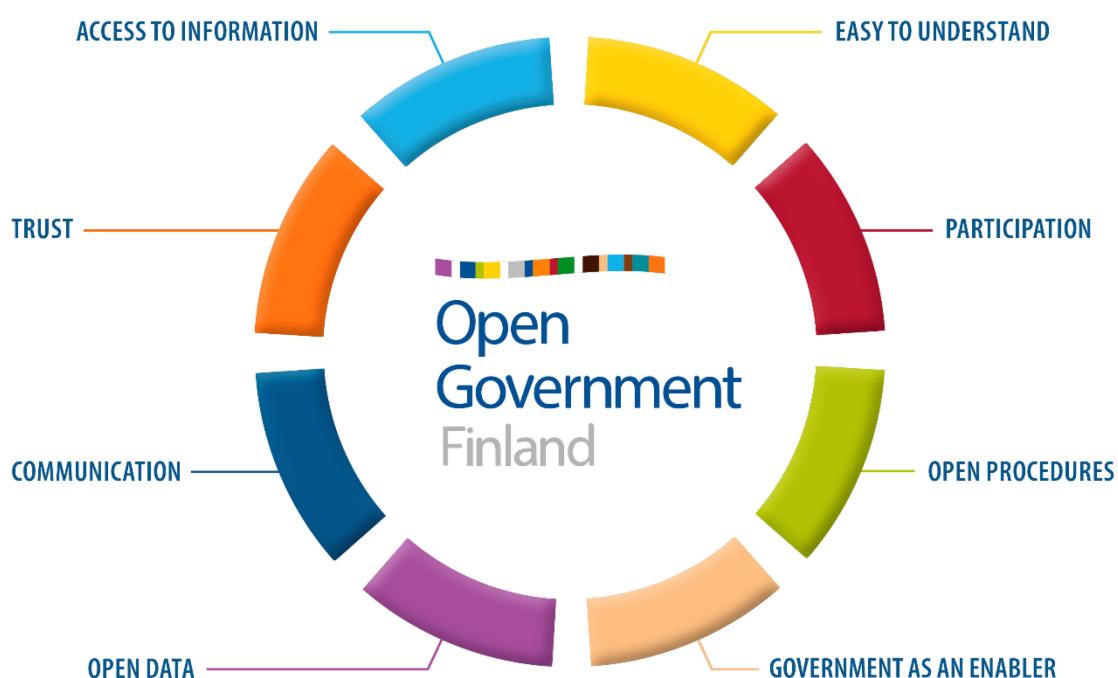


Open government

National Action Plan for 2019-2023 Finland

24/09/2019
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Starting points

As a basic value, openness is clearly visible throughout the Government Programme.

In Finnish society and its public sector, openness is a fundamental value. This is also visible in its being one of the eight shared values that are described as the building blocks of [the central government's value basis](#).

Similarly, openness and inclusion are emphasised in the [Government Programme](#) of Prime Minister Sanna Marin. The pledges of the Government Programme on policy reforms emphasise a new kind of interaction and a need for the development of ways to engage a broader group of stakeholders in reforming society. The Government Programme explains that a new kind of interaction means both involving people much more strongly in public government activities and searching for and testing new ways of interacting (Prime Minister Marin's Government Programme, p. 9). One of the goals set in the Government Programme is to ensure favourable conditions for inclusive practices and diverse civic activities nationally, regionally and locally. Another goal is to improve the operating conditions of civil society and to tackle inequality with inclusion. Measures will also be taken to promote equal opportunities of inclusion in meaningful civic activities and to safeguard the autonomy of NGO activities. The practices on hearing measures and assessment of impacts will also be improved and competence on civil society will be increased within the government. These objectives are interconnected with the question of trust between the various parties in society, as emphasised in the Government Programme, which is a precondition of a socially sustainable society and its reform.

The government activities are a shared responsibility of the entire public sector

The open government activities apply to the entire public sector in Finland. In accordance with the OECD [Recommendation on Open Government](#), the activities are a shared responsibility of all branches and levels of government. The goals and measures of open government will be developed in cooperation with interest groups and civil society.

Why does openness matter?

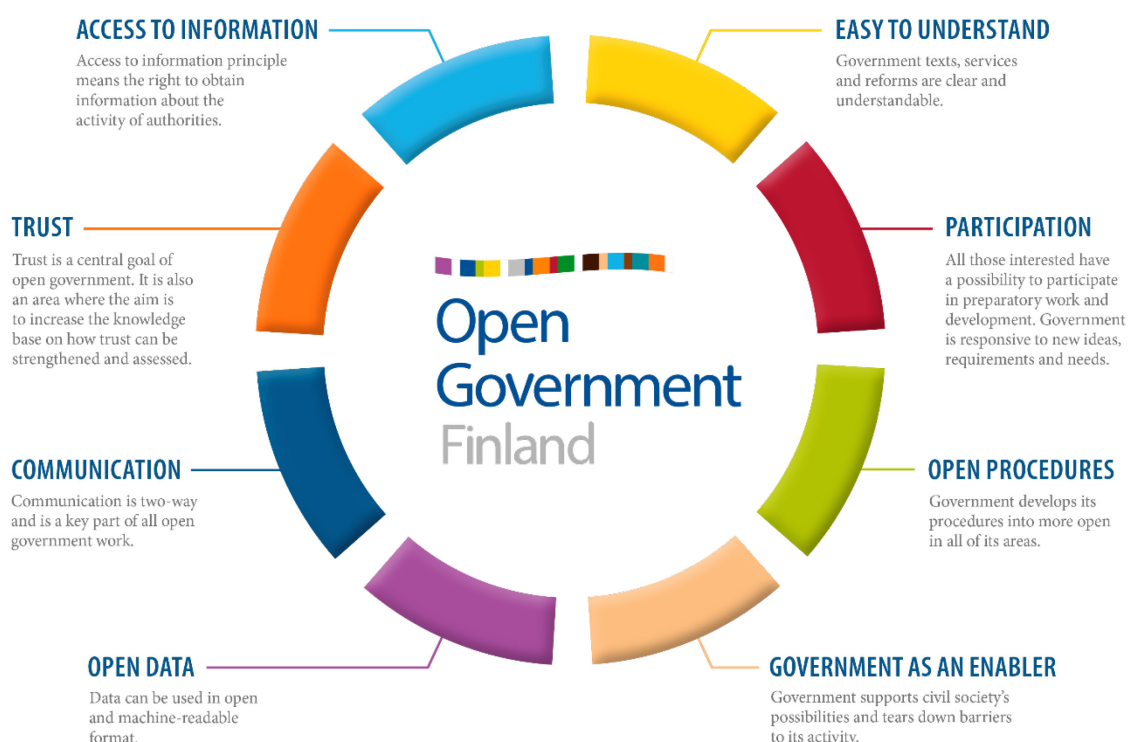
The starting points for promoting openness in the work of open government have included:

1. **Trust** - Strengthening trust between citizens and other civic actors and the government.
2. **Participation** - Promoting everyone's opportunities for participation in the development of the society.
3. **Transparency** - Ensuring the transparency of government activities by increasing the accessibility of information.
4. **Combating corruption** - Developing government openness in corruption prevention measures.

According to the OECD ([link to the OECD website](#)) and OGP ([link to the OGP website](#)), in the best-case scenario, the open government reforms can help to

- promote innovation,
- make a difference with smaller costs,
- promote compliance with laws,
- better adjust policy outlines and services to the needs of people,
- support the government in setting more effective and profitable goals and
- promote social and economic development that enables equality and equal inclusion.

In Finland, the open government activities are made up of eight elements



Two primary goals have steered open government activities from the beginning:

- Supporting the strengthening of trust between the various actors in society.
- Helping to secure equal opportunities for participation in society's operations and their development.

These goals were important focus areas in the preparatory process of the IV Action Plan and they were brought up in the comments, views and suggestions received from the different contributors. The Government Programme similarly emphasizes trust, alongside openness and inclusion, and states that "Trust among individuals and also among different players in society is a key condition for building a socially sustainable society." (Government Programme of Prime Minister Marin, p. 7).

The traditions of promoting openness in Finland are long and deeply rooted.

There is a long-standing, historical and strong commitment to the rule of law in Finland. In international comparison, corruption is very rare. The freedom of speech, freedom of religion and freedom

of assembly are secured by the rule of law and they are observed in practice. The Administrative Procedure Act and the Act on the Openness of Government Activities lay down the principles of good governance, issuing grounds for the decisions and the publicity of documents. The Finnish Act on the Openness of Government originally dates from 1776. The present-day law entered into force in 1999 and it gives citizens and media the permission to access government documents. They are primarily classified as public, unless there are specific reasons that require certain documents be classified as confidential. Furthermore, the law stipulates that public officials have the responsibility to engage in active communications.

There are over 100,000 civil society organisations in Finland, which is a very high number when proportioned to the population. The Constitution sets forth the principle of citizen participation, as its Section 2 states that “Democracy entails the right of the individual to participate in and influence the development of society and his or her living conditions” and Section 14, Subsection 4 sets forth that the public authorities shall promote the opportunities for the individual to participate in societal activity and to influence the decisions that concern him or her. The principles of openness and citizen participation are furthermore presented in a number of other acts, including the Local Government Act (410/2015), Language Act (423/2003), Youth Act (1285/2016) and Land Use and Building Act (132/1999).

Openness and public access to documents are also fundamental principles and basic rights of the European Union. EU member states and EU citizens are allowed to benefit from these existing and acknowledged principles during and in connection to the EU decision-making process.

Despite the long-standing tradition of openness, constant work and development is needed in order to promote it. In the spring of 2012, Finland decided to join the international Open Government Partnership ([OGP](#)) and was accepted as a partner in April 2013. Information about the previous Finnish Action Plans is appended to this Action Plan.

In accordance with the principles of the OGP partnership programme, Finland has prepared two-year national Action Plans since 2013. The goal in promoting openness has been to revive trust among citizens and to establish it at a high level. This is only possible if the citizens find that the structures, activities, measures, services and reforms of the government are understandable and it is possible for them to participate in the decision-making preparatory process, planning of services and development of the welfare society. The leading principle is that the promotion of openness in government must penetrate all government activities and reforms.

Four-year term for the IV Action Plan on Open Government

The IV National Action Plan on Open Government was made in 2019 and covers a four-year term. This in order for it to support in the best possible way the goals of the Government Programme throughout the government term. It has been the case with the previous, two-year action plans that their term has proven to be too short to engage in long-term activities and achieve real impact. However, an intermediary assessment was included in the Action Plan, to evaluate the realisation of the goals and to assess if new commitments should be added to the plan. As part of the intermediary assessment the programme was also assessed from the perspective of gender and equality from the point of view of impacts on the opportunities for children and young people to gain information and participate. A new commitment has been added based on the Open Government Strategy that was published in 2020 and some goals have been revised based on the strategy. Also action points have been added to the the action plan based on the recommendations made by the OECD in the Trust review and Civic Space reviews of Finland.

The Action Plan on Open Government does not contain all the measures that are taken to promote open government at the state and local level. Work for the promotion of openness is carried out

daily on many fronts. In accordance with the OGP principles, the national Action Plan contains the key elements that will be prioritised during its term. The objective is, however, that the Action Plan remains concise and contains only a limited set of goals. During the term of the Action Plan, spreading information and good practices and supporting all other work carried out in order to contribute to government openness, even when they are not indicated as commitments in the Action Plan, is an additional goal of the programme. Centralised resources worth approximately 1.5-2 man years and an appropriation of €40,000 has been budgeted for open government activities. For 2019 and 2020 the appropriation has been €80,000.

Commitments

The term of the IV Action Plan of Finland is four years (9/2019-9/2023). A four-year term makes it possible to engage in work in a longer term and allows being more closely connected to the goals of the Government Programme. Based on the intermediary assessment (in 2021) the programme has been updated in October 2021

The goal of the Action Plan is to further strengthen the three key areas that have traditionally been the cornerstones of promoting openness in Finland.

- These are openness as a shared value,
- the strong legal foundation of openness and
- continuous development of openness.

Even though the first two of the aforementioned are Finland's strongpoints, continuous development is a necessity to prevent the development from stagnating. Continuous development means that the government will continue the improvement and development of its existing practices and add to its contributions to ensure openness, inclusion and trust. This will also mean that new innovations must be introduced within the government and new opportunities introduced by technological innovations will be utilised as well as having an open approach to new ideas.

The updated Action Plan contains five commitments and the measures intended for their achievement. The timetable and indicators have been specified.

Commitment 1 Sustainable openness

Sustainable openness means that openness penetrates all government actions and development measures. Genuine openness is impossible to achieve if the activities of the government are incomprehensible. In international comparison, Finland is a model country of openness. However, the changing world brings about new challenges. Citizens' demands towards government openness are increasing due to technological development, among other reasons. Also the global Covid-19 pandemic has brought new problems and needs. It is important to ensure that comprehensive development of openness continues and that all those involved in government operations are duly competent in this respect. When fulfilling this commitment, the goal is to pay special attention to the opportunities of participation for people in the most vulnerable position.

Of the OGP initiatives, this commitment address all four: transparency, citizen participation, accountability and technology & innovation.

Action	Responsible party (others)	Schedule	Indicators
Understandability - Systematical and proactive increase of easy language skills (easy Finnish	MoF	online course 2020-2021	A survey will be carried

<p>and easy Swedish) and increase of usage within public sector organisations</p> <p>An online course on easy language will be organised. Preparation of marketing material that will also contribute to the purposes of the course and can be used as an introduction to plain language. Easy language is in particularly needed by the authorities in the various administrative branches involved in direct customer contact with citizens or who produce different types of administrative texts, such as decisions, forms or guidelines. The goal is that increased command of easy language will also mean that it will be more commonly used and that the volume of materials produced in easy language will grow.</p>		<p>materials 2020-2021</p>	<p>out to establish how many central government organisations have a plain-language introduction to the organisation or its key services or instructions on their website.</p>
<p>Understandability - Training and support for the use of good administrative language</p> <p>An online course on good administrative language has been prepared. We will introduce guidelines and a programme to ensure that public officials and employees will take the course. The online course will become part of the orientation of new employees. A further goal is to ensure, in cooperation with the municipalities and the Association of Finnish Local and Regional Authorities, that there is a sufficient number of people who have completed the course in local government.</p> <p>Expertise of language and communications, and a broader understanding of linguistic matters is required, not only for customer communications by officials, but also when it comes to management, decision-making and the preparatory tasks by experts in the various sectors.</p> <p>In addition to training, there is a need for constant development and maintenance of skills and support offered by the departments and at workplaces. Support is needed when new services are produced or activities reformed, but also in daily activities. The plain language programme also seeks to support the increased use of language and usability experts at public offices and workplaces. The first priority is that the language is easy to understand for the citizens.</p> <p>In addition to the online course on good administrative language, the Institute for the Languages of Finland (Kotus) is preparing a more extensive online training material of administrative language as part of its three-year (2019–2021) project.</p>	<p>MoF</p>	<p>2020 programme completed</p> <p>2021 programme implementation</p>	<p>Course completed by, classified by agency</p> <p>Survey</p>

<p>Plain language also means non-discriminatory language. All authorities are, by law, required to prevent discrimination and to promote gender equality and non-discrimination in all their activities.</p>			
<p>Understandability - visualisations In addition to plain text and speech, good visual solutions promote understandability and accessibility. A package of support materials will be produced, which will contain the practices of good visualisation and examples of successfully completed cases within the administrative branches.</p>	MoF	support package 2022	
<p>Understandability - Boosting the accessibility competence among public officials It will be ensured that competence on accessibility will be increased in public administration and that understandable and plain content will be highlighted in public online services. Together with Celia, a short course will be prepared on the eOppiva platform on how accessibility and plain content are connected.</p>	MoF	Course 2020-2021	
<p>Inclusion - CSO Academy - public officials to gain competence and CSO connections A CSO Academy Day will be co-organised by the central government and CSOs. The day is intended for everyone, in particular those public servants for whom work with CSOs is not a part of their day-to-day tasks. The goal of the day is to provide people in the government more in-depth competence on the work of CSOs, and to help public officials to make new CSO contacts in their own sector. The event will contribute to the goals of the Government Programme on boosting civil society competence in the government. Pilotining organising CSO days in regions with regional actors Development of competence relevant to non-governmental organisations is also carried out as a part of the management development and support activities.</p>	MoF	2020 pilot 2021 format ready and the event becomes annual	
<p>Inclusion - The day of the Elderly Citizens Council and the day of Children's Rights will be complemented with the introduction of a day of the Council for People with Disabilities. It is important that the representatives of the councils for people with disabilities will gain additional opportunities for sharing competence and experiences at a national level and to carry out development activities together. The Elderly Citizens</p>	MoF,	2020 survey 2021 pilot	

<p>Council day has been organised for a number of years now. In the future, the Councils for People with Disabilities will be offered a similar annual event, which could partly overlap the day of the Elderly Citizens Councils. The day of the Councils for People with Disabilities will be organised jointly with the Advisory Board for the Rights of Persons with Disabilities (VANE) and by hearing the wishes by members of Councils for People with Disabilities on the goals for the day.</p>			
<p>Enforced compliance with the Act on the Openness of Government Activities The experiences by the Chancellor of Justice indicate that the compliance with the Act on the Openness of Government Activities remains insufficient. A significant number of the complaints received by the Chancellor of Justice concern the Act on the Openness of Government Activities.</p> <p>As outlined in the Government Programme, compliance with the Act on the Openness of Government Activities must be enhanced by issuing stricter obligations for government officials to comply with the Act on the Openness of Government Activities in a manner that promotes openness and by determining more explicit consequences for breaches of the law.</p> <p>The goal is to enhance the openness-promoting compliance with the Act on the Openness of Government Activities through ethical and purpose-oriented development in particular. This is because the interpretations of the Act on the Openness of Government Activities and the data protection regulations are, in many respects, genuinely borderline cases and there are strict sanctions for unlawful disclosure of confidential information.</p>	MoJ		
<p>Openness - Strengthening commitments The support package for open government activities and its various language versions will be updated. As part of the update, materials will be added and developed in the following fields in particular: 1) enabling and supporting the participation of young people (children and young people under 18), 2) taking into account the various linguistic groups in the promotion of government openness and development of opportunities for participation and information on linguistic rights and means to promote them, 3) the equality aspect, 4) accessibility in order to support the new law concerning accessibility (Act on Providing Digital Services, 306/2019) and to ensure that people with disabilities have access to information and opportunities</p>	MoF	<p>Support package completed in 2021</p> <p>Marketing of the Openness Game 2020</p> <p>Openness training 2022</p>	

<p>for inclusion. The accessibility element will be completed in cooperation with Celia and other parties that offer accessible services</p> <p>The support package will also contain information on how public officials, local government officials and public sector employees can take part in social media debates and how to face and increase citizen participation on social media, for example.</p> <p>A Swedish-language version and an internet version of the game will be produced. Boosting the marketing of the “Openness Game” as a means of development at the same time as the net version is launched.</p> <p>A training course on openness will be produced for the eOppiva platform in Finnish and Swedish. The contents will also feature basic information on the Act on the Openness of Government Activities and such topics as personal data protection. One of the modules in the training will cover internal inclusion.</p> <p>Openness and inclusion must become part of everyday tasks. It will seek to establish the kind of opportunities and means which could be used to support public officials in their efforts to act as openly as possible in their tasks in the office. The principle is that openness is deeply rooted in all of the government’s operational methods and attitudes instead of being a separate responsibility that causes extra work.</p>			
<p>Communications - Supported by management commitment A regional tour will take place and offer a forum of dialogue for the local government management, public officials and government officials in the region and the topics will include the activities on the promotion of openness, inclusion and trust. The goal is to strengthen cooperation and communication between authorities that promote openness.</p>	MoF	Regional rounds 2020	
<p>Communications - Sharing best practices Collecting and additionally highlighting Finnish and international best practices and tools for promoting open government.</p> <p>Supporting open government international development actively by sharing information about Finnish open government work and best practices.</p>	MoF	continuous plans communications etc. 2020	

<p>One important element in sharing best practices is the availability of information and its accessibility as laid down in legislation concerning accessibility (306/2019) through websites and other means. Online services must comply with level AA as laid down in the accessibility recommendations.</p>			
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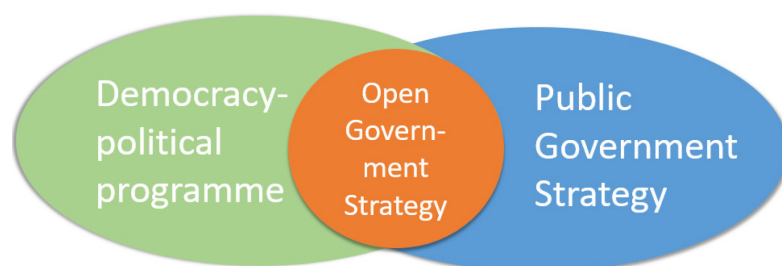
Commitment 2 Open Government Strategy

Open government actions have previously been taken in Finland based on two-year action plans. The action plans have been founded on commitments and practical support measures. The Open Government Strategy will determine the direction of the work in the long term and the objectives that will be used as the basis of building future action plans. The Open Government Strategy will be used to promote stronger trust between citizens and the government.

The Open Government Strategy and its preparation will contribute to all four OGP initiatives (transparency, citizen participation, accountability and technology & innovation).

Action	Responsible parties	Schedule	Indicators
<p>Preparation of Open Government Strategy of Finland</p> <p>The Open Government Strategy will be prepared as part of the public administration strategy that is mentioned in the Government Programme of Prime Minister Rinne. The Open Government Strategy will constitute one of the chapters of this strategy. The Open Government Strategy will be prepared alongside the Action Plan on Democracy Policy.</p> <p>The strategic work will take into account the changes in the operational environment, which will concern electronic services, communication and exchange of opinions in particular. Developing digital connections will, on the one hand, introduce new opportunities for communication, action, participation and influence, but on the other hand they are channels that make it possible to actively erode decision-making processes and trust, with means including the spreading false information, cyber attacks and harassment of system operations.</p> <p>As part of the strategic work, it will also be explored how improved strategic observation of civil society in the work of the various ministries could be realised and when the profit goals are monitored and profitability measured.</p>	<p>MOF</p>	<p>2020</p>	

<p>As part of the strategic open government activities, support is offered for the preparatory work of the ministries' NGO strategies and their updates. NGOs report that ministries with existing strategies have achieved good results.</p> <p>The regional rounds mentioned in Commitment 1 are also used for dialogue on the open government strategy.</p> <p>The openness training that will be prepared on eOppiva will be used for communications and dialogue on the strategy.</p> <p>The Open Government Strategy is also one of the OECD recommendations on open government.</p>			
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Commitment 3 Transparency register

There is a good legal foundation for openness in Finland. As the world changes, the legal foundation also requires supplementation. [An international comparative study on lobby registers](#) was carried out based on a commitment in the II Action Plan of open government. A parliamentary committee was established after the study and it issued an unanimous proposition recommending the establishment of the transparency register.

The transparency register will offer citizens information on the parties that seek to influence decision-making. Decision-makers will be provided more in-depth information on the roles of the parties that seek to influence them. The register will help lobbyists to provide more information about their lobbying and influencing activities in an increasingly open manner.

Of the OGP initiatives, the transparency register corresponds particularly to that of transparency and accountability.

Action	Responsible parties	Schedule	Indicators
<p>Establishment of transparency register In accordance with the Government Programme, a law on the transparency register will be enacted after parliamentary preparation and consultation with civil society. The purpose of the act is to improve the transparency of decision-making and,</p>	MoJ	2019-	

<p>through this, prevent inappropriate influences and strengthen public confidence.</p> <p>In the preparation of the transparency register legislation, the basic rights and freedoms of natural persons will be taken into account and special attention will be paid to the safety of their personal data.</p> <p>It will be established whether it will be possible to include data on the outside employment and private interests of public officials. Government officials are required to submit notifications of their private interests and outside employment. If working hours are used for the tasks of the outside employment or if it can impact the impartiality of a government official, a permit to engage in outside employment will be required. The data submitted has not been recorded in a register.</p> <p>It will furthermore be explored whether it will be possible to collect records of the parties invited to parliamentary committee hearings in a single transparency register. It could also be possible to append a list of the post-employment waiting period agreements as referred to in the State Civil Servants Act.</p> <p>It will also be established whether it will be possible to collect private interests data on a municipal level into a national transparency register.</p>			
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Commitment 4 Open data

The commitment and measures on open data contribute in particular to the OGP initiatives of transparency and technology & innovation. The measures are in line with the Act on Data Management in Public Administration, data policies and implementation thereof.

Action	Responsible parties	Schedule	Indicators
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<p>Open data: The public sector promotes government openness by opening public interfaces if there are no specific reasons to keep them restricted. The process will prioritize the most influential data resources. Easy-to-use, developer-friendly interfaces that follow the outlines of standard architecture will be developed to access public administration data resources. The data available on the interfaces will be recorded using standard procedures into a machine-readable and -interpretable format in order to make it easier to benefit from. The guidance needed in order to open the data and create the interfaces is available (e.g API principles and the operating model for sharing information. A successful user experience of the data and its easy accessibility will lower the threshold of using the data and increase its usage. As a result, data producers will be more motivated to improve the quality and usability of data and data resources. The objective of this is to achieve a virtuous circle in which the quality of data will be improved and it will provide benefits, and the benefits of open data will spread far and wide inside the society, also when companies join to become producers of open data. These measures will acknowledge the outlines and development measures of European Union within this theme, including the Open Data Directive (EU/2019/1024), also known as the PSI directive.</p> <p>The requirements concerning data protection and the data confidentiality regulation will be taken into account when plans are made for opening up data.</p> <p>The project will be completed in a cross-administrative effort of cooperation, so that the cumulation of data will not put the data security of public administration at risk.</p>	MOF, Digital and Data population data services agency	2020-2022	API principles are ready and available for use. The operating model for sharing information is ready and available for use.
<p>Quality criteria: Quality criteria intended to facilitate the utilisation of data will be prepared. Quality criteria for public administration data will be drafted and taken into use with indicators. Quality improvement measures following the quality criteria will be primarily applied to the most significant data resources in the data opening process. Setting quality criteria and the extent of their validity will be planned to make up part of putting the quality criteria into practice.</p>	MOF, Statistics Finland	2020-2022	Quality criteria ready and available for use.

<p>Ethical guidelines: The measures to open public sector data will promote a data and AI policy that is ethically, financially and socially sustainable. Meta data that contributes to data resources management of high quality will also contribute to the creation of unified information resources required by machine-learning and AI in our linguistic area and, subsequently, the realisation of linguistic rights in an indirect manner.</p> <p>Special groups will be consulted and the standards laid down in international human rights conventions and UN and other actors' including UNESCO and CAHA recommendations on the ethically sustainable use of AI as well as data security and equality questions will be acknowledged as a part of the preparatory process.</p>	MOF	2020	
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Commitment 5 Strengthening the competence and use of dialogues

One of the key priorities of the open Government Strategy is to bring the dialogues more strongly into the use in public administration and to strengthen interactive professional skills in the public sector.

<p>National dialogues – a concept for national dialogues will be created in cooperation and on the basis of Lockdown Dialogues The development of national dialogues will be based on the Lockdown Dialogues in broad-based cooperation with various actors. At the same time, the aim is to form a new flexible structure for conducting national dialogues. In its reviews of trust and civil space, the OECD has recommended that Finland establish national dialogues. The aim of the national dialogues is to strengthen trust between different actors in society by discussing issues that are important to citizens.</p>	MoF	Creating the concept of National Dialogues 2021-2022	The concept of National Dialogues ready
<p>Dialogue pilots and good practices as part of the #Hyvinsanottu (#Wellsaid) campaign The objective of open government #Hyvinsanottu campaign is to promote the use of dialogues. This will be implemented in cooperation with pilot organisations and by sharing</p>	MoF	2021-	

good practices on those public sector organisations where the dialogues are already in permanent use.			
Dialogue with dialogue researchers and active utilisation of research data in development work The project know your neighbour funded by Kone Foundation investigated Open Government dialogues and Lockdown Dialogues (open Government 2020). The results of research on the dialogues will be actively utilised and potential new opportunities for research cooperation will be explored.	MoF	2021-	
Dialogues as part of the development of proactive steering and leadership development In the development of anticipatory innovation governance and public-sector leadership development will be carried out to strengthen trust between different public sector actors.			

Programme evaluation

The progress of the programme will be monitored on the avoinhallinto.fi website on which the information on realised measures will be posted twice a year. Membership of the international OGP programme sets the requirements of carrying out an annual self-evaluation of the programme and the IRM evaluation (Independent Research Mechanism) of the OGP.

Programme organisation

A working group of representatives of the various partners involved in the programme (ministries, agencies, municipalities, organisations, researchers, media and corporate life) will be established to support its implementation. Similar working groups have been established to provide support for previous Action Plans.

The principles of the Open Government Partnership (OGP) entail that the work is steered by a body with representatives from non-governmental organisations and the government. The Advisory Board on Civil Society Policy (KANE), appointed by the Ministry of Justice, already exists in Finland. As with earlier Action Plans, it will also be expedient to appoint KANE as the body to which OGP refers in steering open government work also in the framework of Action Plan IV.

Furthermore, an open government network of public officials is intended to support the Action Plan into the future, to which the state organisations will appoint their representatives. The representatives will produce reports on the measures taken by their agencies and departments and post these to the network and, similarly, to the management of their agency or department of the open government measures. Several network events will be organised annually.

The Municipal Democracy Contact Network has been the network for the local authorities. These two networks will also host events together.

Another goal for the term of Action Plan IV is to improve communications of the work by the open government itself, and this will be realised by making a separate communications plan that will be more extensive than before.