Open data and the fight against corruption in Latvia, Sweden and Finland

FINLAND
Transparency International Latvia (Sabiedriba par atklatibu – Delna) is the national chapter of the international coalition against corruption Transparency International. It is the leading watchdog organization in Latvia with the main aim of contributing to the formation of an open, just and democratic society, free from corruption in private and public sectors and interpersonal relationships.

Open Knowledge Finland is a non-profit organisations whose goal is to promote and advance the development of open societies through technology and education in Finland. The organisation is part of Open Knowledge International, a worldwide network of non-profit organisations and activists focused on realising open data's value to society by helping civil society groups access and use data to take action on social problems.

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In recent years, with the increasing use of technology by governments across the world, Open Data - ‘digital data that is made available with the technical and legal characteristics necessary for it to be freely used, reused, and redistributed by anyone, anytime, anywhere’ has emerged as an important potential instrument in the fight against corruption.\(^1\)

Due to its characteristics, open data allows the bringing together of diverse datasets published by different government departments in formats that let actors inside and outside the public administration to freely reuse explore and operate with the data. This has helped governments overcome bureaucratic barriers improving efficiency, reduce the mismanagement and misallocation of resources and secure a transparent, more accountable exchange with citizens.\(^2\)

Studies on the topic have shown that reduction of corruption opportunities has often been an incidental benefit, rather than an explicit objective of governments’ efforts on open data. In many cases, policies did not begin as anti-corruption measures but were rather adopted in an effort to modernise the state administration and make it more efficient.\(^3\) As a consequence, crucial opportunities for value added through harmonisation of open data and anti-corruption have been missed.

When anti-corruption data is available as open data across national borders, citizens, journalists or officials in one country can draw upon data from another easily – and without having to go through various administrative processes to access information. This may assist investigators working in risky contexts allowing investigations to proceed without political interference or placing a spotlight on the investigator. It can also support easier investigation of cross-national corruption networks.\(^4\)

Open data can be part of the evidence in cases concerning corrupt activity, but trend analysis with data on courts, enforcement and sanction processes might be used to target scarce enforcement resources and scrutinise the effectiveness of the enforcement system itself, highlighting areas in need of systemic improvement.\(^5\)

The purpose of this report is to assess to what extent the Finnish government has implemented internationally agreed-upon open data principles as part of its anti-corruption regime and whether is there room for improvement. It also seeks to provide recommendations on how principles can be implemented in the country so that open data can become an effective tool in the fight against corruption.

The report is part of a wider study – with similar reports on Latvia and Sweden and a general overview – aimed at gaining a better understanding of how Nordic and Baltic countries are performing in terms of integration of anti-corruption and open data agendas. The study is also aimed at highlighting and identifying opportunities for knowledge transfer and regional cooperation on anti-corruption policies and practices.

For governments and society at large, there is an urgent need to adapt to the digital world and move toward the concept of national and regional “open data ecosystem” - where governments, public administrations, media, NGOs, etc. consume and reuse data that enables them to make more informed decisions and better perform their work, fostering public integrity at the national and international level.\(^6\)
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List of abbreviations

ACOD - Anti-Corruption Open Data
BO - Beneficial Owner
CPI - Corruption Perception Index
CSO - Central Statistics Office
FOI - Freedom of Information
GDPR - General Data Protection Regulation
IATI - International Aid Transparency Initiative
ICT - Information & Communication Technologies
IODC - International Open Data Charter
JHS - Public Administration Recommendation
KANE - Advisory Board for Civil Society Policy
NADS - National Architecture for Digital Services
NAO - National Audit Office
NGO - Non-governmental Organization
OECD - Organization for Economic Cooperation & Development
OGP - Open Government Partnership
OKF - Open Knowledge Finland
PSI - Public Sector Information
UBO - Ultimate Beneficial Ownership
YTJ - Business Information System
Key Findings

• In recent years, the Finnish government has been among the trendsetters in Europe in the implementation of open data policies and has built a sound national digital infrastructure allowing the state administration to provide information as open data. With the MyData movement, Finland has led the way at the global level with regard to innovative approaches for the harmonisation of data protection rules with an open data environment.

• The Finnish government has made available online 8 out of 10 key anti-corruption datasets and 6 of them are fully in line with open data standards. However, only half of them can be accessed through the central open data portal avoindata.fi, thus making it harder for users to discover and work with them. Most of the anti-corruption datasets assessed in this study allow for feedback loops on data published with potential positive effects on the quality of data provided.

• The Finnish government has generally promoted the use of mass digital platforms to engage with civil society on several public policy issues, including public integrity. However, there seems not to be a specific e-partecipation platform for consulting anti-corruption organisations on their data needs.

• The Finnish government has supported studies on the impact of open data, including one concerning the potential implementation of a lobbying register in the country. It has also published general guidelines and toolkits for public officials on the effective use of open data, although these are not focused on anti-corruption prevention.

• Finnish tech-oriented civil society organisations have played a key in strengthening the use of open data in the fight against corruption in Finland. This has also been favoured by the high rate of digital literacy and public activism among the Finnish population. The Finnish government has often partnered with them in initiatives fostering the development of open data tools for public integrity and civic engagement.

Key Recommendations

• The Finnish government should consider integrating open data policies in the national anti-corruption strategy and ensure cooperation and cohesion among government institutions and agencies in charge of anti-corruption and open data. This could also include providing cross-departmental trainings and courses aimed at building the capacity of public employees to use open data to prevent and/or identify corruption.

• The Finnish government should support further studies on the potential use of open data in the fight against corruption according to national strategic priorities. It could also consider establishing mechanisms for the identification of the key datasets making up a national anti-corruption data infrastructure and agree with agencies responsible for the data on a feasible
• The Finnish government should consider adjusting the existing digital participation platforms in a way that they allow for focused consultations with civil society and media on their anti-corruption data needs. This would foster common understanding decision making-processes and cooperation in the development of anti-corruption policies.

• The Finnish government should leverage the high level of digital skills and vibrant tech-oriented civil society in the country and keep promoting initiatives to raise awareness on how open data could be used to fight corruption and increase public accountability, targeting media, anti-corruption NGOs and citizen activists.
In recent years, with the increasing use of technology by state administrations, with thousands of procurement processes taking place every month, and hundreds of spending transactions by governments every day, data generated and stored by government and public sector has become a key resource to spot irregularities and corruptive behaviour within the state administration. In this context, Open Data — ‘digital data that is made available with the technical and legal characteristics necessary for it to be freely used, reused, and redistributed by anyone, anytime, anywhere’ has emerged as an important potential instrument in the fight against corruption. Information generated, created, collected, processed, preserved, maintained, disseminated, or funded by or for a government or public institution (commonly referred to as “Public Sector Information - PSI) has traditionally been released through “transparency portals” — websites with a thematic focus, often featuring scanned documents or copyright restrictions denying users the right to reuse data, reducing their potential for transparency. Open data portals, on the other hand, have allowed the bringing together of diverse datasets published by different government departments in formats that let actors inside and outside the public administration to freely reuse, explore and operate with the data. This has helped governments overcome bureaucratic barriers improving efficiency, reduce the mismanagement and misallocation of resources and secure a transparent, more accountable exchange with citizens.

Studies have shown that reduction of corruption opportunities has often been an incidental benefit, rather than an explicit objective of governments’ open data efforts. In many cases, policies were rather adopted in an effort to modernise government and make it more efficient. As a consequence, crucial opportunities for value added through harmonisation of open data and anti-corruption have been missed.

Although, in theory, anti-corruption policies and public policies should coexist, in practice, there can be tensions. In fact, whereas public policies aim to deliver solutions to concrete problems in the most effective and efficient way possible, anti-corruption strategies place emphasis on compliance with the rules and procedures, in order to ensure the integrity of the policy process. As such, there is often a feeling that this adds bureaucracy and delays to policy processes, creating challenges when governments are facing demands to become more responsive. It is crucial then to explore how open data can be introduced and integrated into the policy processes in ways that protect and promote authorities’ and institutions’ responsiveness to corruption risks and incidences.

When datasets are available as open data across national borders, citizens, journalists or officials in one country can retrieve information from another easily and without having to go through various administrative processes to access information. This may have crucial benefits for investigations of cross-national corruption networks, allowing law enforcement authorities, reporters and other actors to investigate without political interference or even forming anti-corruption task forces for the most complex cases.

Open government Data should also be understood as the will of the government to widely disseminate information on issues that may be controversial or cause harm to third parties or the public interest. As such, it is important that governments have functioning legislative frameworks on Data Protection and Right to Information (RTI) applying reasonable restrictions that ensure that sensitive and confidential data is removed from the public domain and give citizens the right to a fair justification for refusal of provision of information. Internationally recognised standards for such exceptions are related to the need to protect intellectual property (copyright), trade secrets, privacy and national security (state secrets).
National anti-corruption data infrastructure

Government data is frequently generated and stored through the use of information systems, organised and structured in state held databases containing different datasets. However, as forms of corruption vary across countries and legal frameworks, also government systems and databases vary, it is often difficult to identify those related to anti-corruption.

Acknowledging this, the International Open Data Charter (IODC) - a collaboration of more than 70 governments and organisations whose goal is to promote a culture of government openness through the use of open data - has identified a total of 30 key datasets relating to each of the traditional core elements of a corruption network: a group of

a) individuals and organisations, organised through a series of agreements and schemes – in some cases violating

b) laws and government procedures – to extract a certain

c) rent from

d) public-related resources, or obtain an undue benefit for a private gain. Together, these 30 datasets form the basis of a solid national anti-corruption data infrastructure (see next page for an overview).

As corruption often operates through complex networks, which leave data footprints throughout different databases, it must be acknowledged that the great power of data comes when users are able to combine datasets. It is particularly important that connections can be established and followed across information systems, national borders and different sectors, prioritising key datasets.

To answer this need, governments have recently started to focus on the importance of cross-cutting open data standards that can be used to link up data published in different data portals. Among the most popular ones are, for example, the Popolo data standard for democratic organisations or the OpenCorporates data standard for company register. Such standards are a valuable tool to reduce variations across datasets and enable users to carry out cross-references between databases and cross-country comparisons.

Furthermore, open data may have a number of benefits for the activities and procedures of law enforcement authorities, for example:

• trend analysis with open data can be used to target scarce enforcement resources;

• open data of all forms can be part of the evidence in a case around corrupt activity;

• open data on courts, enforcement and sanction processes can be used to scrutinise the effectiveness of the enforcement system itself, and to highlight areas in need of systemic improvement.

The role of media and civil society organisations

As government’s open data portals are generally designed with a technical audience in mind, theories of change around open data for anti-corruption assume that skilled intermediaries will access, interpret, and work with the datasets published, facilitating wider dissemination. This role has traditionally been fulfilled by the media, organised civil society, data-oriented investigative outlets and often even public officials. These actors can turn abstract ideas and data into simple messages and stories that other citizens can relate to. Moreover, their motives, skills, resources and capacity to influence the public debate are not the same as those of the general public.

Investigative media, for example can investigate, detect, and report incidences of corruption, bringing cases into the public sphere and instigating judicial involvement. As such, their work could be facilitated with the implementation of initiatives aiming to empower journalists to access and use open data as well as to publish the results of their own investigative work, whenever possible, as open data.

On their side, anti-corruption civil society organisations (CSOs) contribute to raise public awareness about corruption, its causes, consequences and possible remedies, fostering a culture of integrity. Indeed, much of the “policy transfer” around Open Data for anti-corruption has happened not at the level of states but within civil society, and in particular, within emerging networks of technology-focused civil society organisations and citizen activists. This is exemplified by the Open Government Partnership (OGP), a multilateral initiative that brings together government reformers and civil society leaders to create action plans that make governments
more inclusive, responsive and accountable.\textsuperscript{20} In the spirit of multi-stakeholder collaboration, OGP is overseen by a Steering Committee including representatives of governments and civil society organizations. In order to further improve civil society’s capacity to foster public integrity through open data, there is a need for programmes, training workshops, tools or guidelines aimed at improving data literacy among anti-corruption professionals and activists.

While interventions on political accountability mostly rely upon “centralised actors” such as media and CSOs, the general public tends to be more inclined towards demanding service accountability – people mostly value information that is directly relevant to their everyday lives and concerns. However, there exists evidence that the data collected are being used to deter and/or punish wrongdoing could encourage users to engage with anti-corruption ICT processes.\textsuperscript{21} For this reason, public authorities should educate citizens about which datasets are in their possession and try to develop methods for engaging the general public to monitor the available data in order to identify potential corruption cases and easily communicate with specialised public bodies such as anti-corruption units and auditors.\textsuperscript{22}

For governments and society at large, there is an urgent need to adapt to the digital world and move toward the concept of “open data ecosystem”, where governments, public administrations, media, non-governmental organisations (NGOs), etc. consume and reuse data that enables them to make more informed decisions and better perform their work, fostering public integrity at the national and international level.\textsuperscript{23}
2. Note on Methodology

The main goals of this study are to find answers to the following questions:

• To what extent has the Finnish government implemented open data principles as part of its anti-corruption regime?
• What are the main national government policies and practices for open data and anti-corruption?
• Where is there room for improvement?

The methodology followed to answer the questions above was developed by Transparency International and the World Wide Web Foundation, establishing a baseline framework of assessment for the implementation of G20 Anti-Corruption Open Data (ACOD) Principles, adopted by G20 countries in 2015 and inspired by the International Open Data Charter’s six Open Data Principles. The latter were developed in 2015 by governments, civil society and experts around the world to represent a globally-agreed upon set of aspirational norms for how to publish data. These six principles are also reflected in the 2011 Open Government Partnership Declaration, which Finland has signed. The six principles are:

1) Open by Default - Governments should proactively disclose government data unless certain exceptions apply. The principle goes beyond transparency, as it requires the proactive provision of reusable data from its source in order to increase access in equal terms for everyone.

2) Timely and Comprehensive - Governments should identify and publish key high-quality and open datasets at appropriate time intervals. Publication of the data should be informed by actual demand and identified through ongoing public consultation. The principle also encourages a government to apply consistent dataset management processes across all levels.

3) Accessible and Usable - Governments should increase data accessibility and usability by lowering unnecessary entry barriers and by publishing data on single-window solutions, such as central open data portals. They should also promote open data initiatives to raise awareness and increase data literacy and capacity building among potential data users.

4) Comparable and Interoperable - Governments should implement open data standards and ensures that open datasets include consistent core metadata such as descriptive titles, the data source, the publication date and the available formats, as well as adequate documentation.

5) For Improved Governance and Citizen Engagement - Governments should promote the use of online collaboration to engage with anti-corruption organisations, and to equip government officials so that they may use open data effectively.

6) For Inclusive Development and Innovation - Governments should support international efforts towards open data and encourage civil society, the private sector and multilateral institutions to open up data. Governments should also engage in new partnerships with anti-corruption stakeholders and share technical expertise with other governments and organisations.

The requirements under every principle have been turned into questions that can measure anti-corruption policies and practices, including both general questions and specific questions for ten datasets that have been identified as key to anti-corruption efforts (see next page). For the questions directed at anti-corruption datasets, binary responses have been created, enabling us to score performance. Research consisted of both desk-research and key informant interviews.
Anti-corruption datasets

The table below lists and describes the ten key anti-corruption datasets assessed in this study, as well as the category they belong with regard to the key elements of a corruption network. The datasets are only a relevant sample from a broader set of 30 anti-corruption datasets - identified by the International Open Data Charter forming an ideal national anti-corruption open data infrastructure.26

**LOBBYING REGISTER**

Data repository that identifies individuals and organizations that act as lobbyist (i.e. represent or act in behalf certain group). These repositories should also contain data about the activities and meetings of these group linked to government authorities, such as who they are lobbying, who they are lobbying on behalf of (clients) and what they are lobbying about.

**ANTI-CORRUPTION:** can show which individuals or companies are trying to influence government decisions.

**COMPANY REGISTER**

Data repository containing data about every company legally registered to operate within a jurisdiction. These registers must use company identifier and should contain at least data about the legal name, type of company, date of incorporation and company directors.

**ANTI-CORRUPTION:** Provides basic information on companies that investigators can use when trying to understand corruption networks.

**BENEFICIAL OWNERSHIP REGISTER**

Containing the natural person(s) who are the beneficial/effective owner(s) of an asset, including at a minimum the beneficial ownership of companies or land. In order to allow clear identification of beneficial owners and control chains the register should provide means of describing attributes of natural persons and legal entities, (name, nationality, country of residence/registration, date of birth, and any public identification numbers).

**ANTI-CORRUPTION:** Allows investigators to identify who effectively owns or control companies and better understand connections of interests investigating a corruption network.

**PUBLIC OFFICIALS DIRECTORIES**

Data repository that identifies every public official above certain administrative or organizational level, including full name, position, date of appointment, contact information and name of superior. Regularly, governments publish such data within their websites, but it should be available also as open data.

**ANTI-CORRUPTION:** understand who, because of their position, has access to state funds or can make key government decisions., thus preventing abuse in major public functions by officials or their family or associates.

**GOVERNMENT BUDGET**

Data repository that organizes, categorizes and describes the expected income and the planned expenditure of a certain government unit or the total units of a government, during a specific period of time. relating to the broad funding priorities set by a government, and it is often highly aggregated or grouped by the goals of a particular agency or ministry.

**ANTI-CORRUPTION:** Provides a framework for
understanding how governments are spending their money and measure their commitment to transparency.

GOVERNMENT SPENDING

Data repository that allows to identify any incurred expense by a government unit, including the recipient, amount, modality and date in which it was executed. Data contained in such records must allow to link the expense with a government order or liability, such as contract, as well as with the budget assigned to such unit.

ANTI-CORRUPTION: Provides granular information on how governments are spending their money and so can be used to spot unusual expenditures.

PUBLIC PROCUREMENT

The dataset should contain details of the contracts issued by the national or federal government, including contract award data and not just requests for bid. The purpose is to open up the contracting process for public scrutiny, including all stages from the bid request to the contract award and possible amendments.

ANTI-CORRUPTION: Provides key information on how government money is being spent and can help identify suspicious patterns such as over-bidding or collusion between different contractors.

POLITICAL FINANCING

Data repository that allows to identify the financing sources and donors of politicians, political parties and similar organizations, including data about the grants or payments received.

ANTI-CORRUPTION: Provides information on how political parties and individuals are funded and so can potentially expose individuals or companies who are paying for political access.

VOTING RECORDS

Data repository that registers the votes that are made individually by the members of legislative bodies, according to their mandate. Data about every parliamentarian vote on committees, bills and resolutions must be clearly identified. Additional data about the rationale of the voting can be included. There should be registers on individual voters in the national legislature (including session, chamber and law category - amendment, new bill, nomination, etc.). The purpose should be to provide information on the judiciary system and legislative process.

ANTI-CORRUPTION: Voting records can be crossed-referenced against other datasets, including election or party funding information, to identify potential corruption.

LAND REGISTER

Data repository that catalogues, organizes and registers ownership of land, property or real estate, within a jurisdiction. Land registers vary according to each jurisdiction and its legal dispositions. For example, the cadastre is a type of land register used in several jurisdictions. Land and property registers should include geographical data and must not only identify the legal owner, but also the ultimate or beneficial owner.

ANTI-CORRUPTION: Provides basic information on land ownership that investigators can use when trying to understand corruption networks.
In assessing the 10 datasets, these 9 criteria were considered and turned into yes/no questions:

1. **Dataset**
   - The dataset is made available online in any form.

2. **Timeliness**
   - The dataset is timely and updated regularly.

3. **Granularity**
   - The dataset is released at the finest level of granularity available without data aggregation.

4. **Format**
   - The dataset is released in machine-readable and re-usable format.

5. **Openness**
   - The dataset is free of charge under and open and unrestricted licence.

6. **Accessibility**
   - The dataset is released without mandatory registration.

7. **Open standards**
   - The government implements open standards related to data formats, interoperability, structure and/or common identifiers when collecting and publishing data.

8. **Metadata**
   - The dataset include consistent core metadata including at least a descriptive title, data source, publication date and available formats.

9. **Documentation**
   - The dataset is accompanied by clear documentation with sufficient information to understand the source(s) and analytical limitations of the data.

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**i.** The requirement of timeliness was applied subjectively by the author, according to observed evidence of international practice as well as expert advise received while doing this study. With the exception of the government budget and spending, whose update is usually related to legislative cycles, all the other datasets were considered to meet the requirement if the frequency of the update usually takes place within one week from the generation of the data.

**ii.** The requirement of granularity was applied subjectively by the author, according to observed evidence of international practice as well as expert advise received while doing this study. In the context and for the purposes of this research, the concept was applied broadly - referring to the basic information of the dataset as described in the table above. For a more detailed overview of the content of the datasets, see https://airtable.com/shrHY9KFJ5bircwvx/tblOY2awIhYUuJze9
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**Average score 6.1**

### Links
- **Public Procurement**: [https://www.hankintailmoitukset.fi/fi/](https://www.hankintailmoitukset.fi/fi/)
- **Land Register**: [https://www.maanmittauslaitos.fi](https://www.maanmittauslaitos.fi)
3. Corruption and Open Data in Finland

Corruption

Finland has ranked for several years at the top of the Transparency International's Corruption Perception Index, a result of an administrative culture of transparency and openness, a strong system of internal and external controls, and the strong involvement of civil society in the management of public affairs - all recurring features of the “Nordic model”. Yet, Finland is also the only Nordic country which has suffered 20 percent loss of trust in national government since 2007. This is partly reflected in the trend of the CPI score in the last three years. Finland has kept the rank number 3 in the index, but its score has decreased from 90 in 2015 to 85 in 2017.

The recent worsening of corruption perception might be linked to some isolated but relevant incidents of corruption occurred in recent years. In one instance, Finland’s Prosecutor General Matti Nissinen was indefinitely suspended from his position over an investigation into whether he had personally lobbied for the purchase of educational services from a firm owned by his brother. In another isolated and outstanding corruption case, the former head of Helsinki’s anti-drug police unit, Jari Aarnio, was found guilty and sentenced to ten years of imprisonment in 2016 over charges of abuse of office, aggravated fraud and passive bribery in relation to the purchase of equipment and software on behalf of the Helsinki police department from a company in which Aarnio was an investor with decision-making powers.

Apart from the isolated cases outlined above, it seems that the major corruption risks in Finland are related to public procurement, especially at the local level. The European Commission has also emphasized the need to make public procurement decisions more transparent. Public procurement in Finland is governed by the 2016 Act on Public Contracts and Concessions, which requires that all construction contracts above EUR 150,000 have to be tendered, while Companies are recommended to implement special due diligence procedures to counter corruption risks in the procurement process. The law also mandates the publication of state procurement data in a centralised register.

Political party financing is regulated by the Political Parties Act, which requires candidates and parties to report campaign donations exceeding EUR 800 in local elections, and EUR 1,500 in parliamentary elections. The National Audit Office (NAO) is responsible for auditing political party funding and candidates’ election financing.

In June 2017, Finland approved the Act on the Combating Money Laundering and Financing of Terrorism, which implements the EU’s Fourth Anti-Money Laundering Directive. As of 1 July 2019, companies and other entities must register persons who own a significant holding of the company or entity as well as other beneficial owners.

There is no legislation in Finland that regulates lobbying. Finnish lobbyists do not have to register contact with public officials and may contact members of the government informally as they please. The Finnish government has recently reviewed possible changes to their lobbying policy and have commissioned a study, published in September 2018, assessing the possibility of creating a lobbying register in Finland and amending legislation in this regard.
Open Data

As a country at the forefront of technological development, in the last decade Finland has shown commitment in Open Data policies. The country ranks 5th in the Open Knowledge Foundation’s Global Open Data Index, with a 69% score out of 100%. The country joined the Open Government Partnership in 2012. The OGP process and the broader implementation of open data policies in Finland are coordinated by the Ministry of Finance, which also nominates OGP Support Group - comprising 16 representatives from government and civil society. Finland has one of the highest rates of digital literacy in the world, and a vibrant tech-oriented civil society often partnering with the government in several initiatives aiming to create innovative digital tools for increasing the transparency of government activities and the quality of public services.

Since 2013, the Open Data Programme, subsequent OGP Action Plans, and the National Architecture for Digital Services (NADS) project have helped Finland to make considerable progress in opening up government data and build interoperability. This also included the development of the central open data portal avoindata.fi. Due to the apparently worsening situation with corruption, the link between Open Data and Anti-Corruption is more explicit in the 3rd OGP Action Plan, whose implementation began in July 2017. The plan commits to increase government transparency and improve citizens’ trust in government by opening decision-making procedures to the public for monitoring. This includes applying and distributing information on open government principles, publishing information on public projects, as well as making the government more visible on social media.

In recent years, Finland has also led the way at the global level in new approaches to the harmonisation of open data with tighter data protection rules. The concept of MyData, developed by 2014 study commissioned by the Finnish Ministry of Transports and Communications, MyData refers to a new approach to personal data management and processing that sees personal data as a resource that individual can access and control. The aim is to provide individuals with comprehensive tools for personal data management and transparency mechanisms that openly show how organisations use their personal information (i.e. purchasing data, traffic data, medical records, etc.), while encouraging organisations holding personal data to give individuals control over this data, extending beyond their minimum requirements to do so.
Open Data Principles
Principle 1
Open by Default

The first principle encourages governments to promote the development of information technology systems and adopt policies and practices to ensure that all government anti-corruption data is ‘open by default’ – reusable from its source and without requiring requests for information – increasing access in equal terms for everyone. At the same time, governments should observe domestic laws and internationally recognized standards pertaining to protection of personal data, security, intellectual property and trade secrets, ensuring that sensitive, confidential and personally-identifiable data is anonymized or removed from the public domain. This principle also encourages governments to work towards the establishment of an anti-corruption culture of openness and prevention in state administration with the help of training and awareness programs, guidelines designed to increase open data literacy of public officials.

Open Data Policies and Practices

The Finnish government has in place relevant policies to make government data open and widely available. These are managed by the Finnish Ministry of Finance. The 1999 Act on the Openness of Government Activities established that all records and (electronic) documents from official state, municipalities and state-owned enterprises must be open to the public. Notably, the law does not explicitly mention the ‘open by default principle’. However, in addition to the Act itself, there is a separate Decree on the Openness of Government Activities and on Good Practice in Information Management which provides guidelines for government officials working with information management and FOI issues. Another important piece of legislation is the 2011 Act on Information Management Governance in Public Administration, which lays down the legal basis on information management governance in public administration and on promoting and ensuring the interoperability of information systems. In August 2018, the Finnish Ministry of Finance has presented a draft bill for a new ‘Information Management Act’, which would replace the abovementioned laws and update provisions on data management and security. The Open Data Programme was run from 2013 to 2015 to eliminate obstacles to the reuse of public data and accelerate the opening of information resources free of charge, in machine-readable format and with transparent conditions of use. As reported by the Finnish Ministry of Finance, the opening of information resources has been included in the central government’s spending and fiscal plans, while ministries had to report on plans for opening up information and estimate economic and social impacts. In the context of the Programme, the central open data portal avoindata.fi was launched in 2014. The platform aims to provide information about opened data resources as well as interoperability descriptions and guidelines for centralised use. Currently, the service offers information on more than 1,400 opened resources and is the responsibility of the Government ICT Centre Valtori.

In 2015, the new Finnish government adopted a follow-up strategy to the Open Data Programme for the years 2015-2020, in which it commits to keep supporting the systematic opening up of information, implement a common model for the production, management and services of key basic information resources, and establish a cross-sectoral national data and information skills programme. Overall, Finland has adequate ICT systems in place for data management and sharing that ensure that all government data can be made open by default. Whereas the Open Data Programme paved the way from the practical implementation of the ‘open by default’ principle and resulted in the creation of the open data portal, the project ‘National Architecture for Digital Services (NADS)’ aims at building a compatible infrastructure facilitating information exchange of information between authorities, citizens and companies, by creating a national data exchange layer, a new national e-identification model and
other innovative solutions to improve the efficiency of the system.57

Open Data Literacy and Anti-Corruption Awareness

As of September 2018, there was no evidence of specific training programmes or guidelines designed to make government representatives aware of the benefits of open data against corruption, even though separate programmes are in place on both anti-corruption and open data.

In the framework of the Open Data programme and the Open Government Partnership, the Finnish Government has implemented training programmes and published guidelines designed to make government representatives aware of the benefits of open data. Open government principles, values, legal basis and a checklist for civil servants were published by Avoinhallinto in the form of concise information cards called the Open Government Support Package.58

The guide to open data available in the Avoindata.fi service provides guidelines on how to open data and shares good open data practices to the public administration and other interested parties.59 The guide was brainstormed and designed together with those public administration agencies with open data initiatives, the Finnish Local and Regional Authorities, Open Knowledge Finland and the Six City Strategy (6Aika), and its contents are improved continuously based on Avoindata users’ feedback, all of which can partake in the development of the guide.60

The Open Data Strategy for 2015-2020 includes the establishment of a national data skills programme for training regional administrations in open government principles and ensuring knowledge of access to information legislation within the civil servants’ network. This includes using open data/government principles using materials from the open government support package.61

The Finnish government also promotes anti-corruption awareness and/or training programmes for public officials. In 2016, the Ministry of Justice set up a specialist anti-corruption network, whose aim is to promote anti-corruption activities and raise awareness, to draft Finland’s anti-corruption strategy and action plan, and to take other initiatives related to anti-corruption activities, including trainings.

material to support decision-making and research on corruption.62 The network is composed of many public and private actors actively involved in the fight against corruption in Finland, including Ministry of Justice, Ministry of Education and Culture, Ministry of the Interior, Confederation of Finnish Industries, Transparency International Finland and many others. As of October 2018, none of the initiatives of the network seemed to be related to open data.

Data protection and Right to Information

Finland has functioning Data Protection and Right to Information legislation, ensuring that sensitive data and and confidential information is removed from the public domain. According to the 1999 Personal Data Act, individuals have the right to know the purpose of the processing of data, to rectify the information or prohibit its process.63 Personal/sensitive data processing is allowed only when the subject has given express consent to it, if expressed by governmental legal requirements, or if data controllers have a legitimate reason for the processing. In March 2018, the Finnish Parliament received the Finnish Government proposal for a Data Protection Act and related legislation, which would supplement and clarify the new EU General Data Protection Regulation and apply in parallel to it. Initially, the new act was supposed to enter into force when the EU GDPR did, in 25 May 2018. However, on 9th May 2018 the Parliament’s Constitutional Law Committee stated that the schedule was too tight, and they needed more time for the parliamentary process. A new date has not been confirmed yet.64

In recent years, Finland has led the way at the global level in new approaches to the harmonisation of open data with tighter data protection rules. A 2014 study commissioned by the Finnish Ministry of Transports and Communications outlined the concept of “MyData” and its technical, legal and business implications.65 MyData refers to a new approach in personal data management and processing that seeks to transform the current organization-centric system to a human-centric system, by treating personal data as a resource that individual can access and control. The aim is to provide individuals with comprehensive tools
for personal data management and transparency mechanisms that openly show how organisations use their personal information i.e. purchasing data, traffic data, medical records, etc.), while encouraging organisations holding personal data to give individuals control over this data, extending beyond their minimum requirements to do so. Due to its characteristics, the MyData approach is expected to function well in the framework of the new EU GDPR. For this to function in technical terms, structural-level reforms are needed to address the lack of interoperability and portability between datasets across services and sectors. As such, the MyData approach also incorporates Open Data principles.

According to the 1999 Act on the Openness of Government Activities, if official requests for information are denied then a reason must be provided for the refusal. Furthermore, all requests must be fulfilled within two weeks from the date when the authority received the request for the document. Individuals have the right to access data, but the controller also may charge for the provision of access if less than a year has passed since the previous instance of providing the data subject with access to data in the file. Yet, this charge cannot exceed the cost of collecting the data. Restrictions to the Act are applied reasonably and include matters of national security, violation of privacy and trade secrets.
**Principle 2**

Timely and Comprehensive

The second principle encourages governments to implement mechanisms for the identification and release of specific anti-corruption related datasets, whose data should be accurate, timely and up to date, and published at a disaggregated level. Governments should allow users to provide feedback and continue to make revisions on the data published and apply consistent information lifecycle management practices, ensuring that historical copies of datasets are preserved, archived and kept accessible for a reasonable period of time.

**Availability** - Finland makes available online in some form 8 out of 10 anti-corruption-related datasets. The datasets not available are the lobbying register and the beneficial ownership register, though the government has taken steps on both. The “International Models of Lobbying Registers” comparative research project, commissioned by the government and led by the University of Eastern Finland, was launched in February 2018 and published in September 2018 with the aim of assessing the possibility of implementing a lobbying register in Finland (more information below). The Finnish Patent and Registration Office makes available basic information on companies registered in Finland on its website or from the related BIS (Business Information System). Following amendments in June 2017 to the Act on the Combating Money Laundering and Financing of Terrorism, companies and other legal entities in Finland must register their beneficial owners or persons owning a significant holding in the company. The obligation for existing companies will start on January 2019, the obligation for new companies will start on July 2019, and all existing entities will have to have registered BO information by 1 July 2020. According to the Ministry of Finance, the registers where UBO information will be registered are public registers. According to the government bill, the intention is that the electronic portal would use strong electronic identification and be integrated to the Business Information System (“YTJ”). More specific regulation may be given when the registers will be established in 2019.

**Timeliness** - 7 out of 8 anti-corruption-related datasets available in Finland are all updated in a timely manner. The company register, government spending information, public procurement, political financing, and land register are all updated daily. Finnish government budget is issued once a year according to the legislative process and data is updated as soon as the information is made available. The only dataset which seems not to meet this requirement is the database of the Finnish Parliament’s voting records – at the time of the writing (October 2018), the last update seem to have taken place in June 2018.

**Granularity** - The 8 anti-corruption datasets available in Finland all meet the granularity requirement, as they publish information in a non-aggregated manner/at the finest level possible. For example, government spending information published in the platform Tutkihankintoia presents values per single agency and departments, down to the single euro. Information on public procurement tender and awards, published in HILMA – a digital portal where public contracting entities declare tenders and companies receive real-time information on ongoing procedures – includes information on all the stages of public procurement. Voting records of the Finnish parliament are published according to single session/single votes by MPs. Finnish land and property ownership data, made available online by the National Land Survey (Maanmittauslaitos) and stored in the Real Estate Information System (KTJ), includes, among other things, ownership of the properties, real estate transactions and value, tenant’s contact, and other details.
Feedback Loops

Most of the anti-corruption available in Finland allow for feedbacks on the data published, including those not available in the central open data portal avoindata.fi. This better allows Finnish authorities to increase the quality of the data according to user needs.

Data Management

Overall, Finland has in place adequate policy components to ensure consistent data management and security practices across government agencies and other public institutions. The 2011 Act on Information Management Governance in Public Administration lays down the legal bases on information management governance in public administration and on promoting and ensuring the interoperability of information systems. In central government, the common starting points for information security include the responsibility of each organisation for the information security of its own operations, the information security obligations stipulated by regulations, the Government resolution on enhancing information security in central government, Finland’s Cyber Security Strategy as well as the VAHTI information security instructions and other policy definitions issued by the Ministry of Finance.

As mentioned above, in August 2018 the Government has submitted a draft bill on a new “Information Management Act”, which will replace the Act on Information Management Governance and updated the dispositions therein. Avoindata.fi supports Public Administration Recommendation (JHS) 189 on licences for the use of open data. It is recommended that the standard open and internationally interoperable licence Creative Commons Attribution 4.0 (CC BY 4.0) be adopted in the re-use of the public sector’s open information resources.
 Principle 3
Accessible and Usable

The third principle encourages government to publish anti-corruption datasets on single-window solutions such as central portals or specific platforms, so that it can be easily discoverable and accessible for users. Anti-corruption data should be released in multiple, standardised open formats to ensure that it can be processed by computers and available to the widest range of users. Datasets should also be free of charge, under an open and unrestricted licence and without mandatory registration, allowing users to choose to download data without being required to identify themselves. According to this principle, government should also promote initiatives to raise awareness of open data, data literacy and capacity building in civil society as well as public and private sector for effective use of open data.

Central open data portal

In the context of the Open Data Programme, avoindata.fi, an open data and interoperability platform, was launched in 2014. The platform aims to provide information about opened data resources as well as interoperability descriptions and guidelines for centralised use. Currently, the service offers information on more than 1,400 opened resources and is the responsibility of the Government ICT Centre Valtori. Even though most of the datasets assessed in this study are available in Finland, at the time of the writing only three of them (Company Register, Government Budget and Spending) were available in the central open data portal avoindata.fi. This means that it is not easy for users to access anti-corruption data from a single repository.

Formats - 5 out of 8 anti-corruption datasets available in Finland are downloadable in machine-readable format: Company Register, Government Budget and Spending (all included in the central open data portal avoindata.fi), NAO’s Political Financing register, the Finnish Parliament’s Voting Records, and the central public officials’ directory at Valtori (State Information and Communication Centre). At present, the public procurement tender and awards register at HILMA does not allow for download in machine-readable format, but according to Finland’s 3rd OGP action plan mid-term assessment, the government is currently assessing the possibility of publish such data in the government spending database Tutkihankintoja.

fi. Documents from the Finnish Land Register can only be retrieved in PDF or browsed through the Real Estate Information service, thus this dataset does not meet the requirement.

Openness - 7 out of 8 anti-corruption datasets available in Finland meet the requirement of openness, as access to data is free of charge and reuse. Company Register, Government Budget and Spending as well as Voting Records all have CC 4.0 License. The only exception is the Land Register. Requests for the Ownership statement can be filed to the customer service and obtained for a fee. If a user needs more than 10 files of ownership information, they must complete a form that explains the purpose of the use of the information.

Accessibility - The 7 datasets in Finland meeting the requirement of openness are also freely accessible, as they do not require registration to access the data. Again, the only exception is the Land register. The service is intended only for authorities, who have unrestricted access, and users who have a license, after signing an agreement. As mentioned above, a private person can purchase other real estate information only after submitting a form explaining the reason for the request and having obtained permission by the competent authority.
Data literacy

The Finnish government has promoted and supported initiatives to raise awareness and increase open data literacy in the public sector and civil society. According to the Finnish 2015-2017 self-assessment mid-term report, open data materials were provided to the public at several public events in 2016 throughout the country. This material included the reasons behind the Finnish government’s involvement with the Open Data Programme, what the Finnish government’s commitments are, and what had been done to fulfill them.90

In the framework of the OGP process, several campaigns were also carried out to raise awareness about e-participation services, including the e-participation portal for youth Nuortenideat.fi, the consultation portal Lausuntopalvelu.fi, and the public feedback portal Otakantaa.fi.91 The Open Government Support Package released in spring 2017 contains visual information on open government principles, clear administration and communication, democracy and participation tools, as well as open data.92

In 2018, ALL DIGITAL Week was organised for the first time in Finland thanks to the new partnership with Bildningsalliansen and Make it Finland.93 All in all, over 1770 persons took part in activities, workshops and events organised throughout the country. These activities focused digital inclusion, digital competence as well as digital creativity and programming for teachers and students alike. Some other events were more narrowly focused on given topics, e.g. online banking, IT support or getting online.
Principle 4
Comparable and Interoperable

Principle number 4 encourages governments to implement, open standards related to data formats and interoperability on anti-corruption datasets, enabling the comparison and traceability of data from numerous anti-corruption-related sectors. Governments should also ensure that such datasets include consistent core metadata such as descriptive title, source, date of publication and available formats and sufficient accompanying information allowing users to understand the analytical limitations of the data.

Open Standards – 6 out of 8 anti-corruption-related databases in Finland are in line with open standard requirement: Company register, government budget and spending (all published in the central open data portal), NAO’s political financing register as well as the Public Officials’ Directory and Voting records, both which are provided as open data interface that allow users for interoperability. As the public procurement register and land register are not provided in open data format, they do not meet this requirement.

Metadata – 6 out of 8 anti-corruption in Finland provide core metadata, those published in the central open data portal, NAO’s political financing register as well as Valtori’s public officials’ directory and Voting records of the Finnish Parliament. As public procurement contracts and land ownership information are not provided as open data, they do not meet this requirement.

Documentation – 5 out of 8 datasets in Finland have adequate documentation explaining the sources and analytical limitations of the data. These are the datasets published in the central open data portal (Company Register, Budget, Spending), NAO’s political financing register, Valtori’s state officials’ directory, and Finnish Parliament Voting Records.
Principle 5
For Improved Governance and Citizen Engagement

This principle encourages governments to promote the use of digital participation platforms to engage with anti-corruption organisations, media and civil society to determine what data they need, and provide tools, success stories and guidelines designed to ensure government officials are capable of using open data effectively. This would foster common understanding decision making-processes and cooperation in the development of anti-corruption policies. According to this principle, governments should also carry out research, oversight and review processes to report regularly to the public on the progress and impact of open data as a tool to prevent corruption and implement mechanisms for fostering the use and application of open data by citizens and the public sector. This would help build trust and strengthen collaboration between governments and all sectors of society.

Data needs

The Finnish government promotes the use of digital participation platforms to determine data needs in civil society, though they are not specifically targeted at anti-corruption. For example, Finland’s consultation process on the OGP plan and its implementation included allowing comments and input on the portals Lausuntopalvelu.fi, the otakantaa.fi discussion forum, and the ZEF-web tool. Online consultation was collected and responded to publicly on the portal, but the consideration of other public inputs, such as feedback provided at workshops, has not been publicized.

Toolkits

The government publishes general guidelines on the use of open data, for instance the Open Government Support Package and the Open Data guide at avoindata.fi. However, at the time of writing there was no evidence of open data toolkits specifically focused in the fight against corruption. The Finnish Ministry of Foreign Affairs provides an anti-corruption handbook for international development cooperation detailing guidelines and tools to curb corruption in aid procurement. However, none of the section seems to be related to open data (the handbook only emphasizes the possible strengths of information sharing as a tool to combat corrupt practices specifically related to bidding and procurement).

Studies and reporting

There is evidence that the Finnish government has supported at least one study to assess the use of open data against corruption, concerning the lobbying register. In 2015, the Ministry of Finance conducted a preliminary study on the impact of open data, but this seems to be only focused on benefits for business and public participation. In October 2017, the Prime Minister’s Office opened a call for analysis, assessment and research activities supporting the government’s decision making, which included international comparative research on lobbying registers and their implementation as one of its themes. As a result, the “International Models of Lobbying Registers” comparative research project led by the University of Eastern Finland was launched in February 2018. The final report, published at the end of September 2018, analyses lobbyist registers in the UK, Ireland, Austria and the USA as well as OECD recommendations on the matter. The author of the report has warned that there is no one-size-fits-all approach to lobbying regulation, which must always be tailored to fit the socio-political context in which it is supposed to operate and regulate the activities of lobbyists; the report suggests that the Finnish government should consider implementing the Irish solution, with a comprehensive legal framework on lobbying overseen by a public entity with adequate funding and an user friendly web site where both lobbyists
and their contacts, as well as their meetings are registered for the general public to review.\textsuperscript{102}

Apart from monitoring the progress of the government’s OGP plan and awareness-raising initiatives about the OGP Plan, as of October 2018 there was no evidence that the Finnish government has regularly reported to the public on the progress and impact of open data as anti-corruption instrument.

**Interaction mechanisms and civic engagement**

Finland’s activities to raise awareness on open data included informing the public through themed workshops, fairs and events. Information about the Open Government Partnership and Finland’s action plan was distributed at several events around Finland. The Open Government monthly newsletter was distributed via a mailing list and published online between June 2016 and July 2017.\textsuperscript{103}

Civil society has played a key role in the implementation of open government policies in Finland. The OGP Support Group - constituted by government representatives from the Civil Servants Network, the Local Democracy Network, and KANE (the CSO-chaired Advisory Board for Civil Society Policy) - meets several times a year to discuss the action plan’s implementation, and public records of the meetings have been available online since March 2016.\textsuperscript{104}

Networks of tech-oriented NGOs have played a key role in popularising the use of open data for increasing public accountability in Finland the use of open data in the fight against corruption. For instance, Open Knowledge Finland has carried out several projects to open up government data, including government spending and lobbying.\textsuperscript{105} One example is the “Make Lobbying Transparent Initiative” led by OKF together with Open Ministry (a non-profit organization that focuses on crowdsourcing legislation and participatory democracy), and the Finnish Chapter of Transparency International.\textsuperscript{106} However, in spite of the large-scale media discussion on the topic, as well as wide-spread support for the commitment among lobbyists and communications specialists, the initiative, had collected less than 8,000 signatures at the time of writing (in the portal kansalaisaloite.fi, at least 50,000 signatures are needed for the initiative to be sent to the Parliament).

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\textsuperscript{106}
Principle 6
For Inclusive Development and Innovation

According to this principle, governments should promote the adoption of open data-related items in accordance with their anti-corruption agenda and encourage citizens, organised civil society, media and the private sector to open up the data created and collected by the. This would help moving towards a richer open data ecosystem with multiple sources to strengthen transparency and integrity. The principle also encourages governments to create or explore potential partnerships with relevant stakeholders in the anti-corruption sector to support the release of open data and share technical expertise and experience with other governments and international organisations. Government should also create or support initiatives that foster the development or co-creation of visualisations, applications and other tools based on open data. This can increase economic output and efficiency in government operations and facilitate the development of new insights, business models and digital innovation strategies at global scale.

Anti-corruption agenda

In the framework of the OGP process, the Finnish government has sought to increase government transparency and improve citizens’ trust in government by opening decision-making procedures to the public for monitoring. For example, transparency issues were addressed in the government’s commitment to publish government undertakings on “Valtioneuvoston hankeikkuna”. However, according to the latest OGP assessment, the transparency of the register as well as the scale of access of information it provides to the public are significantly decreased by the possibility that projects will only be published internally.108

The government has also supported the implementation of the government spending database Tutkihankintoja.fi, where state spending information (goods, supplies and services) is available in open data format with an innovative visualization system. The website was published on 4 September 2017 by the government’s central purchasing body.109

Strategic Partnerships

There is evidence that the Finnish government has often partnered with relevant stakeholders in the anti-corruption sector for the release of open datasets. For example, the government budget visualization service “Examine the budget”, was the result of a collaboration between the Ministry of Finance and the Civil Servants network.110 Another instance is the MyData movement, which the Ministry of Transport and Communications runs in partnership with Open Knowledge Finland. Additionally, according to the latest OGP assessment, Open Government has been presented in the annual International anticorruption day event organized by the Ministry of Justice and the Transparency International Finland.111

International Networks

The Finnish government provides support and technical expertise to some multilateral institutions, even though as October 2018 there was no evidence that this specifically featured open data for anti-corruption. Finland has been involved in the OECD Anti-bribery Working Group since 1999; it is one of the founders of the International Aid Transparency Initiative (IATI) and is among the group of governments that provide political, technical and financial support to the Extractive Industry Transparency Initiative.112 In the promotion of open data, Finland conducts active,
network-based cooperation with international actors. Finland has, for example, participated in the pan-European Share-PSI project: the best practices for open data developed in the project have been included in the guide to open data available in the Avoindata.fi service.\textsuperscript{113}

**Open Data Tools**

In recent years, the Finnish government has demonstrated to be both an initiator and a supporter of programmes and initiatives fostering the development or tools based on open data that could contribute to the fight against corruption. According to Open Knowledge Finland, the growing priority for creating interactive visualizations has been actively addressed in the next action plan. (Teemu’s mention on latest OGP assessment)

“Hack the Budget 2016” was a competition organised by Open Knowledge Finland (OKF) and the Finnish Ministry of Finance.\textsuperscript{114} For the hack, the competition team used OpenSpending\textsuperscript{115} to create visualizations with fiscal data from the Ministry of Finance’s website. The goal was to harmonise Finnish Government expenditure data from 2002-2015 into a Fiscal Data Package\textsuperscript{116}, an internationally comparable format. OKF proposed that combined datasets enable exploration of alternative costs from budget data for citizens, NGOs, businesses, party-political organisations and public officials.

In 2016, the Ministry of Finance, the Ministry of Education and Culture and the Civil Servants Network organized the “Budget Belongs to All” hackathon, with the aim of creating ideas for opening up government budget data and making it easier to use.\textsuperscript{117} As a result, the Tutki Budjettia Service (Examine the Budget) was published on 22 September 2016, providing the Finnish government budget in open data and user-friendly format.\textsuperscript{118} Furthermore, the Ministry of Finance also published the state spending service Tutkihankintoja.fi with the aim of improving Finland’s global open data index score, and according to a representative from the Ministry of Finance, it has been a groundbreaking and important step toward open access and government transparency.\textsuperscript{119}
Conclusions

Open by Default

In recent years, the Finnish government has been among the trendsetters in Europe in the implementation of open data policies and has built a sound national digital infrastructure allowing the state administration to provide information as open data. Even though the ‘open by default’ principle is not explicitly mentioned in Finnish legislation, it is widely applied in practice by the state administration. Overall, Finland has a functioning data protection framework and Right to Information legislation ensuring that sensitive and confidential information is removed from the public domain. With the MyData movement Finland has led the way at the global level with regard to innovative approaches for the harmonisation of data protection rules with an open data environment.

The Finnish government has promoted training programmes and guidelines aimed at making public officials aware of the benefits of open data and set up a civil servants’ network for strategic anti-corruption policies. However, so far there seems to have been little integration between the agendas of the responsible authorities.

Available, Timely and Comprehensive

The Finnish government has made available online in some form 8 out of 10 anti-corruption datasets, all of them updated in a timely manner with comprehensive information. The only datasets not available are the lobbying register and the beneficial ownership register; however, the Finnish government has taken positive steps towards their implementation. It has funded a comparative study on lobbying registers across the world to consider implementation in Finland, and it has recently approved new anti-money laundering legislation mandating public access to beneficial ownership information though the company register.

Most of the anti-corruption datasets assessed in this study allow for feedback loops on data published. This has potential positive effects on the quality of data provided. The Finnish government has also put in place adequate policy components to ensure consistent data management and security practices across government agencies and other public institutions.

Accessible and Usable

Even though 7 out of 8 anti-corruption datasets are available free of charge and reuse, only 5 of them are also provided in machine-readable format. Only half (4 out of 8) anti-corruption datasets can be accessed through the central open data portal avoindata.fi, thus making it harder for users to identify and work with them. Access to beneficial ownership data in the land register, an important resource against illicit rent extraction and money laundering, is restricted to those with legitimate interests and features paywalls and strict application procedures for obtaining the information.

In the last couple of years, through the implementation of national open data programmes and OGP action plans, the Finnish government has promoted open data literacy among citizens and the public sector through the provision of support packages to the Open Government process, awareness raising tours at the subnational level and data literacy campaigns such as the Digital Week.

Comparable and interoperable

6 out of 8 anti-corruption datasets available in Finland are in line with open data standards, including core metadata and adequate accompanying documentation. The Finnish government has also promoted the implementation of international standards with regard to government budget and government spending. Though there is still space for improvement on this regard, the existing datasets will likely have a positive impact for cross-border cooperation on corruption, money laundering and other strategic issues.
For Improved Governance and Citizen Engagement

The Finnish government has generally promoted the use of mass digital platforms to engage with civil society on several public policy issues, including public integrity. However, there seems not to be a specific e-partecipation platform for consulting anti-corruption organisations on their data needs.

The Finnish government has supported studies on the impact of open data, including one concerning the potential implementation of a lobbying register in the country. It has also published general guidelines and toolkits for public officials on the effective use of open data, although these are not focused on anti-corruption prevention. There is no evidence of the Finnish government has reported to the use of open data for anti-corruption policies.

The Finnish government has in place mechanisms to interact with the general public and organised civil society on the use of open data. These included informing the public through themed workshops, fairs and events. Finnish tech-oriented civil society organisations have played a key in popularising the use of open data in Finland. This has been made easier by the high rate of digital literacy and public activism among the Finnish population.

For Inclusive Development and Innovation

In the framework of the OGP process, the Finnish government has explicitly committed to the use of open data for increasing government transparency and improve citizens’ trust in public institutions. In terms of anti-corruption agenda, this has resulted in the opening up of key datasets such as government spending and undertakings.

The Finnish government has often partnered with relevant stakeholders in the anti-corruption and tech sector for the release of in open data of key anti-corruption datasets. This process was made easier by the strong support received by tech-oriented organised civil society and a highly data-skilled population. Such an environment has also allowed the Finnish government to be both an initiator and a supporter of programmes and initiatives fostering the development of open data tools for public integrity and civic engagement.

The Finnish government has also shared its open data expertise in the pan-European Share-PSI project, it has been involved in the OECD Anti-bribery Working Group since 1999, it is one of the founders of the International Aid Transparency Initiative (IATI) and is among the group of governments that provide political, technical and financial support to the Extractive Industry Transparency Initiative. Participation in these international networks may be beneficial for the promotion of initiatives for the use of open data against corruption at the regional and global level.
Recommendations

A stronger linkage between open data and anti-corruption policies

• The Finnish government should consider integrating open data policies in the national anti-corruption strategy and ensure cooperation and cohesion among government institutions and agencies in charge of anti-corruption and open data. This would be made easier by the existence of a national anti-corruption network bringing together experts from the government and civil society.

• The Finnish Ministry of Finance, the Ministry of Justice and the Anti-Corruption Network should make concerted efforts to implement training programmes, guidelines and awareness raising initiatives linking the use of open data to the fight against corruption. This may entail providing cross-departmental trainings and courses aimed at building the capacity of public employees to use open data to prevent and/or identify corruption, including toolkits, guidelines and best examples. Such undertaking could be included as part of the current commitments and strategies set out by the government for open data and anti-corruption.

• The Finnish government should support further studies on the potential use of open data in the fight against corruption according to national strategic priorities. In addition, the Finnish government should take steps to regularly report on how open data has so far been used to tackle corruption and increasing public accountability in the country. This would help build trust and strengthen collaboration between governments and all sectors of society.

An advanced and comprehensive national anti-corruption data infrastructure

• In line with goals set out in the current national anti-corruption agenda, the Finnish government should consider establishing mechanisms for the identification of the key datasets making up a national anti-corruption data infrastructure and agree with agencies responsible for the data on a feasible timeline to release such datasets in open formats, according to strategic priorities set out in the national anti-corruption plan.

• The Finnish government should follow-up on the recent study on lobbying register and take steps to implement a comprehensive lobbying regulation in the country, including an online lobbying register in open format. This would increase the transparency of influence on political decision-making.

• The Finnish government should ensure that, upon entering into force of the new anti-money laundering rules in 2019, data on beneficial ownership of companies in the country will be available in open format, implementing international standards and drawing example from existing register in Europe and across the world. This would help cooperation between authorities within and outside the countries on complex anti-money laundering investigations.

• The Finnish government should ensure that as many anti-corruption datasets as possible are available through the central open data portal data.gov.lv. The agencies responsible for those datasets which are not yet included in the central open data portal should also ensure that users are able to provide feedback on the data published. This would ensure that users can easily discover and work with the data as well as communicate with authorities for the improvement of the quality of the information provided.
Open data for improved governance and better citizen engagement

- The Finnish government should consider adjusting the existing digital participation platforms such as lausuntopalvelu.fi, otakaanta.fi and ZEF web tool, in a way that they allow focused consultations with CSOs and media on their anti-corruption data needs, or, alternatively, developing new ones. This would foster common understanding decision making-processes and cooperation in the development of anti-corruption policies.

- The Finnish government should leverage the high level of digital skills and vibrant tech-oriented civil society in the country and further promoting initiatives to raise awareness on how open data could be used to fight corruption and increase public accountability, targeting media, anti-corruption NGOs and citizen activists.

Finland as a trendsetter on open data innovation for anti-corruption and public accountability at the national and global level

- The Finnish government should keep forming strategic partnerships with anti-corruption CSOs and the private sector in order to open up more anti-corruption datasets in Finland. This could entail the organisation of hackathons, co-creation sessions and workshops aimed at creating visualization tools, apps and digital platforms for the use of open data in the fight against corruption. Whereas evidence from the past has demonstrated that such model works, such undertaking could further increase economic output and efficiency in government operations and facilitate the development of new insights, business models and digital innovation strategies.

- Finland has demonstrated to be a trendsetter on open data at the European and global level. In contributing with personnel and technical expertise to international organisations, the Finnish government should promote the use of open data against corruption, or proactively import best practices and model apprehended through the participation in such international networks.
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3. Ibid.

4. Ibid.


9. Ibid.


11. Ibid.


15. Ibid.


20. See [https://www.opengovpartnership.org](https://www.opengovpartnership.org)


23. Ibid.

24. See [https://www.opengovpartnership.org/open-government-declaration](https://www.opengovpartnership.org/open-government-declaration)

25. For full methodology, see: [https://www.transparency.org/whatwedo/publication/methodology_and_analytical_framework_q20_anti_corruption_open_data_principles](https://www.transparency.org/whatwedo/publication/methodology_and_analytical_framework_q20_anti_corruption_open_data_principles)

26. To see the complete list of datasets, see [https://airtable.com/shrHY9KFJ5bircwvx/tblOY2awIhYUuJze9](https://airtable.com/shrHY9KFJ5bircwvx/tblOY2awIhYUuJze9)

27. For full questions on these criteria as set out in the methodology, see: [https://www.transparency.org/whatwedo/publication/methodology_and_analytical_framework_q20_anti_corruption_open_data_principles](https://www.transparency.org/whatwedo/publication/methodology_and_analytical_framework_q20_anti_corruption_open_data_principles)

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91. ibid., p.14
92. See http://avoindhallinto.fi/tukipaketti/
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100. See https://tietokayttoon.fi/documents/1927382/S351063/Valtioneuvosto+jaTutkimusuunnitelma+2015+5C%2C4%2C3%2C5B%2C6B%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2C6%2C5B%2C6%2
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