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

LATVIA
Transparency International Latvia (Sabiedriba par atkaltibu – 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 Sweden and Open Knowledge Finland are non-profit organisations whose goal is to promote and advance the development of open societies through technology and education in Sweden and Finland through. Both organisations are 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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Free download of this and the other reports written in the framework of this project is available at www.delna.lv

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Preface

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, reducing the mismanagement and misallocation of resources and securing 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.² 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 Latvian government has implemented internationally agreed-upon open data principles as part of its anti-corruption regime and whether there is 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 Sweden and Finland 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
AML - Anti-Money Laundering
BO - Beneficial Owner
CPI - Corruption Perception Index
CSOs - Civil Society Organisation
EU - European Union
GDPR - General Data Protection Regulation
ICT - Information & Communication Technologies
IODC - International Open Data Charter
KNAB - The Corruption Prevention & Combating Bureau
LATA - Latvian Open Technology Association
LIKTA - Latvian Information & Communication Technology Association
NGO - Non-governmental Organization
OECD - Organization for Economic Cooperation & Development
OGP - Open Government Partnership
PSI - Public Sector Information
RTI - Right to Information
SOE - State-Owned Enterprise
VARAM - Latvian Ministry of Environmental Protection & Regional Development
Key Findings

• In recent years, the Latvian government has made considerable progress in adopting policies and practices for the provision of public sector information as open data. However, some issues still remain with agencies which still partly finance themselves through revenues from the sale of data.

• The Latvian Ministry of Environmental Protection and Regional Development have implemented training and awareness-raising programmes for public officials separately for the use of open data and corruption prevention. However, so far, there seems to have been little connection between the agendas of the two institutions, thus representing an area for further improvement.

• Only 5 out of 10 datasets assessed in the study – company register, public procurement register, government budget, government spending and voting records – are available in open data formats. Other important datasets, such as the Corruption Prevention and Combating Bureau’s political party financing register and data on beneficial owners (those who effectively own or control companies, land and properties, particularly important for anti-money laundering) are only visible through online portals or available in PDF format, which makes it harder for journalists, researchers and organized civil society to work with them.

• The central open data portal data.gov.lv includes only 4 anti-corruption datasets out of 10 (company register, government budget, public procurement register and voting records). This makes it more difficult for users to identify and work with anti-corruption data. Most of the anti-corruption datasets do not allow for direct digital feedback from users, with potential negative effects for the overall quality of the published data.

• Despite the Latvian government has explicitly committed to fight corruption through open data, there is no evidence of specific government-supported studies or reporting carried out on the issue. There are also no guidelines or toolkits aimed at ensuring that public officials effectively use open data to tackle corruption.

• The Latvian government has frequently partnered with tech-oriented civil society in the promotion of initiatives for the development of visualisation, apps, and other tools, such as hackathons and co-creation sessions. Even though such activities have not had a specific anti-corruption focus, the presence of frameworks of cooperation makes it possible for future initiatives in the field.

Key Recommendations

• The Latvian government should set up an incentive structure for public officials in order to promote an open data agenda and raising awareness about the ‘open by default’ principle. This may entail establishing a rewards system for those units publishing information in an open data format.

• The Latvian government should consider integrating open data policies in the national anti-corruption strategy and support cooperation and cohesion among government institutions and agencies in charge of anti-corruption and open data. This could 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.

- In accordance with strategic priorities and in cooperation with VARAM, KNAB should take steps to ensure that as many datasets related to anti-corruption as possible are available through the central open data portal data.gov.lv. This would ensure that users can easily discover and work with the data and communicate with authorities for the improvement of the quality of the data released.

- The Latvian government should consider carrying out studies or thematic reviews on the use of open data in the fight against corruption according to the strategic priorities set out in the national anti-corruption strategy.

- The Latvian government should consider forming strategic partnerships with anti-corruption CSOs and the private sector in order to open up key anti-corruption datasets and foster the creation of innovative apps, tools and visualisation for anti-corruption based on open data.
1. Introduction - Open Data and the Fight Against Corruption

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).13

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.14 Among the most popular ones are, for example, the Popolo data standard for democratic organisations15 or the OpenCorporates data standard for company register.16 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.17

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.18

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.19

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. 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. 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.

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

• To what extent has the Latvian 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?

• Are there opportunities for knowledge transfer and export of best practices among the three countries?

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 Latvia 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.

**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.

**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.

**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/shrHY9KEJ6bir1wvx/hti0V2awthYUuJxe9](https://airtable.com/shrHY9KEJ6bir1wvx/hti0V2awthYUuJxe9)
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**Average score 6.0**

Company Register - [https://data.gov.lv/dati/lv/dataset/uz](https://data.gov.lv/dati/lv/dataset/uz)


Political Financing - [https://www.knab.gov.lv/lv/db/donations/](https://www.knab.gov.lv/lv/db/donations/)


3. Corruption and Open Data in Latvia

Corruption

Although administrative corruption in Latvia has reportedly diminished in recent years, the country still faces relevant shortcomings with regard to public procurement, the judiciary and illicit financial flows. This is reflected in the Transparency International’s Corruption Perception Index (CPI), where Latvia’s score has only slightly improved in the last three years (from 56 in 2015 to 58 in 2017), and still ranks below EU average (65), underlining the need for more focused efforts on critical areas.

Latvia’s public procurement sector has been perceived as lacking fairness and transparency. According to a 2014 European Commission survey, two-thirds of surveyed firms believe corruption is widespread in procurement managed by national authorities, while more than half believe that procurement managed by local authorities is marred with corruption. In response, the Latvian government amended the Public Procurement Law in 2017, mandating for the use of centralised procurement processes, the publishing of data on small procurements (plans and documents) and more severe administrative sanctions for the violation of procedures.

With regard to money laundering, several law enforcement and journalist investigations in the last decade have provided evidence that one part of the Latvian financial sector has often been used by corrupt networks in the post-Soviet space to transit illicit funds from the country to Europe and the rest of the world. The issue has come back to the fore in February 2018, when Latvia’s third largest bank, ABLV, was forced to shut down amid allegations of ‘institutionalised money laundering’ and high-level corruption by the United States. To address the problem, the Latvian government has amended the Law on the Prevention of Money Laundering and of Terrorist Financing (AML law) in November 2017, introducing stricter supervisory measures on financial institutions, public access to information on those who effectively own or control companies in Latvia (commonly referred to as Beneficial Owners - BOs). In April 2018, the government also set down the legal basis for improved financial intelligence sharing by financial institutions and state authorities, overhauling the structure of the Financial Intelligence Unit and enhancing the mechanisms information exchange.

Latvia’s judicial system has in recent years been criticized due to problems of inefficiency, politicisation and corruption. In response to the problem, in the last three years the government has implemented the so called “court territorial reform” envisaging the gradual merging of district (city) courts in the district courts. The aim of the reform, started in 2015, was to increase the efficiency of the judiciary, redress judicial load, rationalise use of courts’ resources and facilitate access to justice for the citizens. As a result of the process, which ended in March 2018, the number of courts and land registry departments has decreased by 74% in three years. The reform was supported and well-received by Council of Europe’s experts, who acknowledged in April 2018 that changes have improved the efficiency of the judicial system and made it more easily understandable for its users. However, according a recent report from Freedom house, problems still remain with delays in the prosecution of complex criminal cases concerning in particular high-level corruption and illicit financial flows where only a few cases have ended with convictions.

According to the 2016 European Union’s (EU) Public Accountability Mechanisms Index, Latvia has a strong and transparent regime regulating political parties financing. The Political Parties Funding Law limits on the private income of political parties. Donations from foreign entities, corporations, trade unions and anonymous donors are prohibited as well as others specified in the law. There are also limits on the amount that can be donated. Political financing in Latvia is overseen by the Corruption Prevention and Combating Bureau (KNAB), which routinely publishes donations to political parties on a centralized register on its website.

Although in the past year a number of laws were passed regulating access to parliament, disclosure of information by decision-makers and conflicts of interest, there is still no standalone legislation on lobbying in Latvia. The KNAB has made active efforts to assess the impact of disproportionate...
lobbying on the Law on the state budget, insolvency administration procedures, and other sectors, providing recommendations for tackling the issue.\textsuperscript{42} However, so far, the process of drafting, approving and publishing legislation has been fragmented and uncoordinated, resulting in the lack of meaningful implementation.\textsuperscript{43} The main reasons for this have been varying information disclosure practices across public institutions, and scarce awareness of decision-makers about how to behave ethically in communication with lobbyists and how to deal with the information provided by lobbyists.\textsuperscript{44}

**Open Data**

In the last two years, the Latvian government has made active efforts in opening up public sector information and laying down the legal bases for open government data. The Ministry of Environmental Protection and Regional Development (VARAM), in charge of open data policies in Latvia, has overseen large programmes introducing technologies for access to information and building long-term technological programmes for public participation. These programmes had a significant impact in changing government practices in access to information and making information from state institutions available as open data.\textsuperscript{45} More recently, VARAM has actively sought to increase the number of datasets on the central open data portal data.gov.lv, setting up a system for prioritising datasets for release in open data formats and conducting promotional activities in order to expand the circle of institutions that release data.\textsuperscript{46} Despite considerable progress was made in opening up public sector information, according to a senior official from VARAM, there are still problems with agencies and independent institutions that are still partially financed by revenue from selling data.\textsuperscript{47}

Since 2016, the Open Government Partnership process in Latvia has been overseen by the State Chancellery, which reports directly to the prime minister. The improvement of public accountability has so far been an explicit motive in subsequent OGP action plans, and several commitments were aimed at curbing corruption the riskiest areas, including public procurement, political financing and transparency of state-owned enterprises.\textsuperscript{48}
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 government 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

In the last two years, the Latvian government has implemented consistent policies for opening up public sector information, providing the legal basis, practical support, and technical opportunities for government institutions to publish data in an open data format. This has led to a major change in government practice regarding access to information if compared to the end of 2013, when public data were mostly accessible only upon request in Latvia. According to the Open Data Maturity in EU report, Latvia showed the most significant progress on open data in 2017 by progressing by 350%.49

The parliament passed amendments to the Freedom of Information Law in 2015 that provide definitions for concepts such as “reuse,” “open data,” and “metadata”, establishing that generally accessible PSI information should be available free-of-charge and reuse.50 The law sets limits on the amount of data produced by the government to avoid an unnecessary burden on public resources (i.e. an institution is not required to collect and disclose data that are not necessary for the fulfilment of its own public functions) and stipulates that in cases in which datasets are not free, the price must not exceed the price of their collection.

Most of the efforts to open up data among government agencies in Latvia were made by the Ministry of Environment Protection and Regional Development (VARAM), which regularly inform government actors about the importance and necessity to open up data through awareness-raising programs and initiatives for ICT skills. For example, the Information Society Development Guidelines for 2014-2020, foresee a range of measures to promote proactive publishing of the public administration data and ensure that they are technically and legally accessible as well as reusable.51 VARAM also developed open data guidelines for publishers that are currently available on its web page and on the central open data portal.52

Furthermore, VARAM manages the central open data portal, data.gov.lv, which was launched in 2017 as result of European Regional Development Funds. At the time of the writing, the portal contains 154 datasets from 43 publishers as of October 2018. The datasets are all free of charge and reuse.53 According to VARAM, even though there has been considerable progress in making government data available, not all government agencies have been willing to open up their databases. Some government agencies, independent institutions and public administrations are still partially financed by revenue from selling data.54

Up to the end of 2013, Latvia’s ICT infrastructure was fragmented, and the lack of coordination and unified information and ICT management principles in the country was the main problem.55 This, however, changed thanks to the implementation of the EU-funded project “Public administration Information and Communication Technology Architecture” (PIKTAPS), whose main objective is to design and implement major centralized platforms, coordinate and cofinance ICT projects and promote the public’s ability and interest in the efficient use of the resulting ICT solutions.56 The State Information Systems Register (VISR)
stores data on state information systems (use, technical resources, managers, etc.), provides comprehensive interoperability, availability and development as well as information to natural and legal persons about the data contained in the registries, system developers and organizations that interact with the VIS. So far, a total of 170 national information systems have been registered.57

In the third OGP action plan, published in November 2017, the Latvian government has committed to set up a system for prioritising datasets for release in open data formats, and to conduct promotional activities about the data available in these formats. The government has proposed activities to increase the number of datasets on the open data portal and to expand the circle of institutions that release data.58 In July 2018, the Cabinet of Ministers approved an informative report prepared by VARAM on priority datasets available to public authorities. The data portal data.gov.lv will be gradually supplemented with 21 new datasets from the Central Election Commission, the Information Center of the Ministry of the Interior, the State Treasury and other institutions.59 The process has been eased by the growing support of open data within government agencies and other public institutions.60

Open data literacy and anti-corruption awareness

There is evidence of trainings, awareness-raising programmes and guidelines implemented by the government respectively for open data and anti-corruption. However, there seems to have been little integration between the two agendas.

In the framework of the 3rd OGP action plan, apart from publishing policy planning documents61, methodological material62 and research63, VARAM organised trainings and supported educational seminars in state and municipal institutions to raise awareness of the principles of open data, and the possibilities of its use.64 However, so far, none of these activities seem to have been focused on corruption. In the next future, VARAM, together with LATA and LIKTA, will make a tour of the ministries to discuss Open Data and transparency aspects related to it. The tour is aimed at encouraging public institutions to make their databases available in open data formats.65

In the framework of an EU-funded project, the Latvian School of Public Administration trains civil servants and public administration employees at the national and sub-national level in matters of anti-corruption and the reduction of shadow economies.66 The project started in 2016 and will end in 2022, while the trainings comprise 8 general modules, though open data is not among them. The Latvian Anti-Corruption Bureau (KNAB) also provides education to national and sub-national public officials on anti-corruption matters, conflict of interest and ethical issues, providing recommendations to institutions for the implementation of internal corruption prevention measures and related issues. According to KNAB, during the first half of 2018, 68 seminars were organized in the territory of Latvia, with a total of 3558 training participants. In comparison, during the same period in 2017, 69 seminars were organized, with a total of 2797 training participants.67

Data Protection and Right to Information

Latvia has functioning Data Protection and Right to Information legislation ensuring that sensitive information and confidential data are removed from the public domain. Under the 2014 Personal Data Protection Law 68, individuals must knowingly and freely consent to the publication and use of their personal data. Individuals have the right to prohibit the use of their personal data in commercial matters, market and public opinion research and other similarly related circumstances. Personal data can only be processed without the consent of the individual in instances of employment legal relations (which abide by other legal laws and regulations), for the protection of life and health, or for official government matters. The intent for processing of personal data must be transparent. Open data databases must not publicly publish any information that may compromise aspects of this law.

The Latvian Parliament (Saeima) is currently assessing whether the country’s existing regulations fit with the new EU General Data Protection Regulation, entered into force in 2018. According to the Ombudsman Juris Jansons, the
new regulation has brought confusion, meaning that the debates will continue at least until the end of the year.69

Exceptions the disclosure of information have been defined reasonably by the 2015 Freedom of Information Law. They cover traditional areas for non-disclosure concerning right to information legislation: state safety, commercial secrets, intent of the information is for internal institutional use only, as well as content related to "certifications, examinations, submitted projects, invitations to tender and other assessment processes of a similar nature".70 The law also gives the right to individuals to receive a detailed explanation from the competent authority when data is refused to be shared.
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 - With the exception of the lobbying register, Latvia makes available online in some form 9 out of 10 anti-corruption datasets object of this study. Through the OGP process, Latvia has formally committed to assess the impact of lobbying on a range of policy areas and provide recommendations for reducing its impact by the end of mid-2019. However, so far, the efforts for regulation of lobbying have not resulted in approved amendments. As such, the Latvian government still seems very far from creating a lobbying register in open data format. According to a representative from the State Chancellery, the current procedure for drafting, approving and publishing legislation is often fragmented and uncoordinated because individual institutions determine this process. This suggests the need for a uniform system for the collection of documents.71 Directories of government employees with details of their role are provided in all ministries’ websites, as this is a legal requirement. Some user-friendly and comprehensive examples with a search function are those of the State Chancellery72 and Ministry of Justice.73 Following amendments to the AML Law in 2017, beneficial ownership information is now publicly available through e-service latvija.lv.74

Granularity - All 9 datasets available meet the minimum granularity requirement and publish non-aggregated information. In the government spending register, for example, values are down to the single euro and divided per sub-programmes). KNAB’s political financing register includes all details of gifts and donations as well as parties’ financial declarations. Information in the Land Register includes name, address, number of designations, base value and description of the real estate. However, information on beneficial owners of the property are available only to “authorised parties”, by contract.81

Feedback Loops

It is possible to provide direct feedback on the published data only on datasets published in the central open data portal, thus the company register, government budget and public procurement. All the other datasets offer the possibility to provide feedback by writing a message or an email to the person responsible for the data.
Latvia has in place adequate policy components to ensure consistent data management and security practices across government agencies and other public institutions. The operations of the State Information Systems are governed by the State Information Systems Act. The legislation sets a uniform procedure data management (formation, registration, maintenance, use, reorganization or liquidation) and regulates the security management of the State Information Systems. Public institutions are responsible for the security of their information systems and are required to appoint a security manager with the task to ensure that the information systems meet the security requirements set by the law and the obligation to carry out a security audit annually.

In addition, data.gov.lv makes available guidelines for data publishers, standards for metadata descriptions, guidelines for the development of metadata, and standards and guidelines for descriptions of machine-readable datasets.
**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**

As a result of the PIKTAPS project, the central open data portal data.gov.lv, managed by VARAM, was made available online in June 2017. The portal allows government institutions to release their publicly available data in machine-readable format with interoperability standards. At the time of the writing, the portal comprised 153 datasets from 43 national, regional and local institutions. The central open data portal includes only company register, government budget, public procurement register and voting records, thus leaving out most of the anti-corruption datasets analysed in this study. In consultations with the author, a senior representative from VARAM has noted that the ministry is currently in contact with KNAB and the State Treasury with regard to making the political financing register and government spending available on the central open data portal.

**Formats** - Only 4 out of 9 anti-corruption datasets available in Latvia are downloadable in machine-readable and reusable format, the Company Register, the government budget and spending and the public procurement register. The Enterprise Register (ER), for example, provides access to the basic data on all entities registered with the ER, in machine-readable format (CSV file), and user-friendly format (XLSX file). However, open data is not mentioned in the description of the e-service to obtain beneficial ownership information of entities in Latvia. Data on KNAB’s political financing register cannot be downloaded, while voting records can only be downloaded in PDF, which is not a machine-readable format. In consultation with the author, a senior adviser from the State Chancellery has supported the idea of making Saeima’s voting records available in open data formats, as this would be in line with current plans of the Cabinet of Ministers to implement a new draft legislation portal in line with open data standards. There is no mention of open data in the description of the Land Register e-service for obtaining detailed information on the value of properties and their owners.

**Openness** - 7 out of 9 anti-corruption datasets in Latvia are free of charge with licenses allowing for the information to be reused without restrictions. Information on the beneficial ownership register and land register can only be accessed by paying a fee to use the e-service. Company Register, government budget and public procurement register all have CC 1.0 license. The other datasets have reasonable requirements such as mentioning the source and prohibition of reuse for commercial purposes and are all to be considered open.

**Accessibility** - The same 7 datasets meeting the criterion of openness are also accessible, as they do not require registration to access the information. The use of e-service for obtaining information on beneficial ownership as well as land and properties requires registration and authentication to the portal.
Data literacy

The Latvian government has promoted open data awareness, digital literacy and capacity building initiatives within civil society and the private sector. NGOs, technology and business associations, as well as public universities have all played a relevant role in the process.

In 2013, the Ministry of Economics, the Ministry of Education and Science, the Ministry of Welfare, the Ministry of Environmental Protection and Regional Development (VARAM), the Latvian Information and Communication Technology Association (LIKTA), the Latvian Internet Association, the Latvian Open Technologies Association (LATA) and the Latvian Chamber of Commerce and Industry (LTRK) signed a Memorandum of Cooperation for the establishment of an “E-skills partnership” in Latvia. The aim of the partnership is to support initiatives to raise awareness on the importance of digital literacy and ICT skills, from a social and economic point of view. The partnership was largely active in the framework of the EU-funded project “Public Administration Information and Communication Technology Management System” (PIKTAPS), which amongst other things, aims at raising awareness and encourage the development of ICT skills and use by citizens. VARAM also implements another EU-funded project for data literacy in the private sector (business).

In March 2018, in the framework of the European Campaign “All Digital Week”, the “Digital Week 2018” took place in Latvia, organised by VARAM in cooperation with LIKTA and partnered by the Latvian State Radio and Television Center, the Cultural Information Systems Center (KISC) and Microsoft Latvia. The purpose of the initiative was to promote ICT opportunities and innovative approaches to e-skills development, including use of open data to students, teachers, entrepreneurs, public officials, unemployed and non-skilled users. The Digital Skills Week (previously called “E-skills week”) has been organised since 2010, with an average participation of 40,000 people every year. In 2017, 638 digital literacy events were organized throughout Latvia, with more than 24,000 people present. Such initiatives and cooperation frameworks represent a potential future vehicle for raising awareness about the importance of open data as a tool for anti-corruption and public integrity.
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 - 5 out of 9 anti-corruption datasets are in line with open standards: Company Register\(^{101}\), Voting records, the Public Procurement register\(^{102}\), the government budget\(^{103}\) (all published in the central open data portal data.gov.lv) and government spending.\(^{104}\) The latter two are downloadable in xslx, which is a format in line with open standards.

Metadata - For the same 5 anti-corruption datasets and basic metadata is available, such as descriptive title, data source, publication date and available formats.

Documentation - Clear accompanying documentation for the published datasets with sufficient information to understand the source and analytical limitations of the data is available only for the datasets published in the central open data portal: Company Register\(^{105}\), the government’s Budget\(^{106}\), Public Procurement register\(^{107}\) and Voting Records. Government spending data, even though is in open format and has core metadata, lacks adequate documentation.
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

Even though there is no specific digital platform focused on determining anti-corruption data needs, VARAM, State Chancellery and KNAB have already in place digital participation platforms respectively to suggest datasets to be uploaded on data.gov.lv, to improve the efficiency of bureaucracy and to report corruption. According to a senior official from VARAM, the Ministry has regularly consulted public accountability organisations before publishing datasets that may be of relevance and has surveyed data users on functionalities of the open data portal, the results of which were considered while developing the beta version. In consultations with the author, a representative from the State Chancellery has expressed the need for digital platform allowing to engage with CSOs on their data needs, as this would make the OGP process more transparent and efficient. At an international workshop organized in the framework of this project, participants have expressed wide support for the implementation of such platform and the need for it to be clear, user-friendly and in line with open data standards.

Toolkits

The Corruption Prevention Bureau (KNAB) as well as VARAM have respectively published guidelines on good practices on anti-corruption and use of open data. However, as of October 2018, there is no evidence that the Latvian government is providing tools, success stories or other guidelines focused on ensuring that government officials are well equipped to use open data as a means to combat corruption. A representative of VARAM interviewed by the author confirmed that the policy link between open data and anti-corruption has been little explored.

Research and reporting

The government, the VARAM and the KNAB have supported research on anti-corruption and open data. However, no studies on their link have been published. Likewise, the government has not reported to the public on how open data is used in the fight against corruption, even though KNAB and VARAM regularly report to the public on their activities.

Interaction mechanisms and civic engagement for open data

Through the EU-funded projects PIKTAPS and CITADEL, the Latvian government has put in place mechanisms to encourage the interaction, use and application of open data by citizens and the public sector. While CITADEL has aimed to help national authorities analyse needs and opportunities for citizen involvement in the process of developing and delivering...
institutional services, PIKTAP has promoted the development of e-skills among ICT practitioners and the public at large, thus popularising the concept of open data. VARAM was also involved in several activities with the public. For example, VARAM experts participated in a conference and discussion on the opening of geospatial data, and in the NGO Data School’s discussions on the use of open data in various areas, such as research and journalism, but not specifically on corruption. Latvia’s OGP commitments were discussed at the meetings of the Memorandum Council, a discussion and decision-making forum consisting of elected NGOs and designated government representatives. Citizen consultation process during the implementation of Latvia’s second OGP action plan was decentralised. In some instances, these institutions used discussion papers, social media, and surveys.

Anti-corruption civil society organisations such as Transparency International Latvia (Delna) and Providus have played an important role in fostering civic engagement through the development of digital participation platforms. For example, Manabalss.lv is a Latvian e-petitioning platform and advocacy campaign created in 2011 that managed to achieve the right for Latvian citizens to e-petition the parliament and ensure that their request has to be considered in public by a responsible parliamentary committee. Another example of digital platform is deputatuzdelnas.lv, initially created in 2010 by Delna and developed in the following years. The database works as an instrument for voters to scrutinize political candidates and is also a tool for civic education, through which Delna has promoted participation in elections, as well as responsibility of politicians and voters.

Furthermore networks of NGOs and technology associations have played an important role in popularising the concept of open data in Latvia. For example, the Latvian Open Technology Association (LATA), whose goal is to unite organizations and individuals among information technology providers and consumers, has hosted open data conferences and other initiatives yearly; the School of Data (Datu Skola), an organization committed to promote data literacy, specifically among NGOs, journalists, the public sector and citizens, has hosted workshops and community events on open data. The Baltic Media Centre of Excellence - a non-profit organisation functioning as a hub for journalists in the Baltic States and Eastern Europe at large, has hosted open data trainings for objective journalism. Groups such as Young Media House and TechHub Riga have offered open data seminars to academia and the private sector.
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 them. 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 last three years, the Latvian government has been proactive in opening up data to prevent corruption. For example, KNAB made available to the public the register of political donations and campaign funding, while the State Procurement Authority launched an electronic procurement system, which according to the latest OGP assessment on Latvia has steadily improved the accessibility of procurement information. Another important area of action was that of the State-Owned Enterprises (SOEs). With the “Open Board” initiative, the government has committed to significantly improve openness by making it possible for journalists and society at large to monitor each step of the selection process, identify candidates’ conflicts of interest based on their declarations, and participate directly in the selection process through nomination committees that involve members of the public. The database valstskapitals.lv provides annual reports on SOEs, including financial indicators, balance sheets, funding from and contributions toward the state budget, and lists of the shares and shareholders of SOEs. The data are free and reusable and are provided in an open data format (xlsx).

Other anti-corruption initiatives undertaken in the framework of the OGP process and still in progress are the commitment to develop regulations requiring openness on lobbying draft laws and policies, and the commitment to launch a new interactive portal for legislation drafted by the Cabinet of Ministers, which aims at revolutionising the current mechanisms for public consultation and feedback on the legislative process of the government.

Strategic Partnerships

As seen above, Latvian government has often partnered with key stakeholders in the field of anti-corruption and open data. However, the author could not find evidence of strategic partnerships formed with the specific goal of making anti-corruption datasets assessed in this study available as open data.

International Networks

The Latvian government actively supports and provides technical expertise to the Open Government Partnership Anti-Corruption Working Group and the Anti-bribery working group of the OECD. Even though at the time of the writing there was no evidence of specific initiatives on open data for anti-corruption promoted by the Latvian government, participation in this network may represent a potential avenue for development in the field.
Open Data Tools

In the past two years the Latvian government has supported programmes and initiatives fostering the development of visualisation, apps, data mashups and other tools. For example, the mobile application "Football", a digital tool developed by the State Chancellery in 2014, achieved wide popularity in international contests and rankings.\textsuperscript{136} In the framework of the CITADEL project, starting from August 2018, the Ministry of Environmental Protection and Regional Development, in co-operation with the University of Latvia, will carry out a series of co-creation sessions to improve the Public Administration Services Portal latvija.lv.\textsuperscript{137} At the end of September 2018, LATA has organised an open data hackathon supported by VARAM, aimed at creating innovative apps based on datasets present in the central open data portal data.gov.lv around the thematic challenges of transportation, culture and regional development. Even though initiatives for developing specific tools on anti-corruption have not taken place, there seem to be the conditions for future development in the field.\textsuperscript{138}
Conclusions

Open by Default

In the last two years, the Latvian government has made considerable progress in adopting policies and practices for the provision of government data as open data, including up-to-date and functioning legislative frameworks on Data Protection and Right to Information legislation. However, some issues still remain with agencies which still partly finance themselves through revenues from the sale of data. Moreover, it is not clear yet how new European Union General Data Protection Regulation will impact the release of anti-corruption datasets as open data.

VARAM and KNAB have implemented training and awareness-raising programmes for public officials separately for the use of open data and corruption prevention. However, so far, there seems to have been little connection between the agendas of the two institutions, thus representing an area for further improvement.

Timely and Comprehensive

The Latvian government has made available online 9 out of 10 datasets object of this study, and all of them updated in a timely manner with non-aggregated information. It has also implemented adequate policy components to ensure consistent data management and security practices across government agencies and other public institutions.

The only dataset not available is the lobbying register, particularly important for the transparency of the influence on decision-making. Even though steps have been taken in this regard by the KNAB, discussions about lobbying regulation in Latvia have not yet resulted in legislative changes. Most of the anti-corruption datasets do not allow for direct digital feedback from users, with potential negative effects for the overall quality of the published data.

Accessible and Usable

The central open data portal data.gov.lv includes only 4 anti-corruption datasets (company register, government budget, public procurement register and voting record). Even though steps have been taken by VARAM to upload data on government spending and political financing, the current situation makes it more difficult for users to identify and work with anti-corruption data. All key anti-corruption datasets in Latvia (7 out of 9) are free of charge and reuse and do not require registration; however, only 5 of them are downloadable in machine-readable format. Information on beneficial ownership of legal entities, land and properties – particularly important for cross-border anti-money laundering investigations – is not available in formats and made less open and accessible by paywalls and registration requirements. Data on political financing is not available in open formats, despite its potential added-value to anti-corruption policies.

The Latvian government has promoted a number of digital literacy initiatives among the civil society and the private sector, in partnership with key stakeholders from those sectors. Such framework of cooperation may represent an important vehicle for future initiatives on the use of open data to foster public integrity.

Comparable and interoperable

Only three anti-corruption datasets in Latvia are in line with open data standards allowing for comparability and interoperability and feature core metadata as well as relevant documentation. This results in scarce comparability and interoperability of Latvia’s national anti-corruption data infrastructure, which may hinder cross-border anti-corruption investigations and regional cooperation.

For Improved Governance and Citizen Engagement

The Latvian government has regularly engaged with anti-corruption civil society organisations and media on open data issues, including their data needs. VARAM, KNAB and the State Chancellery all have digital participation platforms for consultations with the public; however, none of
them has a specific focus on anti-corruption data. Consultations and a workshop organized in the framework of this project have shown that there is widespread support for this kind of tool in Latvia, possibly through such existing digital channels.

Despite the Latvian government has explicitly committed to fight corruption through open data, there is no evidence of specific government-supported studies or reporting carried out on the issue. There are also no guidelines or toolkits aimed at ensuring that public officials effectively use open data to tackle corruption.

The Latvian government has put in place mechanisms aimed at engaging citizens on open data, but these seem not to have had a specific focus on anti-corruption and public integrity. Initiatives for the use of open data have taken places. Organised civil society in Latvia seems to be aware of the potential benefits of open data against corruption and has played a relevant role in monitoring implementation of the OGP process and fostering the use of e-participation platforms.

**For inclusive development and innovation**

The Latvian government, as evidenced by the OGP process, has actively promoted the use of open data to prevent corruption in a number of areas such as political financing, state-owned enterprises and public procurement.

The Latvian government has frequently partnered with tech-oriented civil society in the promotion of initiatives for the development of visualisation, apps, and other tools, such as hackathons and co-creation sessions. Even though such activities have not had a specific anti-corruption focus, the presence of frameworks of cooperation makes it possible for future initiatives in the field.

The Latvian government has also supported and provided technical expertise to the Anti-Corruption Working Group of the Open Government Partnership and the Anti-bribery working group of the OECD. These international networks might represent important avenues for the promotion or import of international anti-corruption open data initiatives and best practices by the Latvian government.
Recommendations

Fostering a culture of transparency and openness across all levels of government

• The Latvian government should set up an incentive structure for public officials in order to promote an open data agenda and raising awareness about the ‘open by default’ principle. This may entail establishing a rewards system for those units publishing information in an open data format. Alternatively, the Latvian government might consider undertaking ‘soft reforms’ with the aim of releasing public information in open data formats, as part of customer service targets and civil service codes of conduct, for example.

• The Latvian government should assess and clarify whether and how the new EU General Data Protection Regulation might affect the disclosure of public sector information as open data, reducing the risk that new rules lead to decreased public access to anti-corruption data.

Strengthening the linkage between anti-corruption and open data policies and practices

• The Latvian government should consider integrating open data policies in the national anti-corruption strategy and support cooperation and cohesion among government institutions and agencies in charge of anti-corruption and open data (KNAB and VARAM).

• KNAB and VARAM should consider cooperating in order to provide cross-departmental trainings and courses aimed at building the capacity of public employees to use open data to prevent and/or identify corruption. Such trainings could be included as part of the current commitments and strategies set out by the government for open data and anti-corruption (i.e. national anti-corruption strategy or OGP action plan). This could also include designing toolkits and guidelines to ensure that public officials are well-equipped to fight corruption through the use of open data.

An advanced and comprehensive national anti-corruption data infrastructure

• In line with goals set out in the current national anti-corruption agenda, KNAB should establish mechanisms defining the national anti-corruption data infrastructure and the identifying key datasets to make available as open data. Thereafter, the KNAB should agree with the government, VARAM and other agencies responsible for the data on a feasible timeline to release such datasets in open formats, according to strategic priorities.

• The KNAB and State Chancelley should keep supporting regulation of lobbying in Latvia. Awareness-raising efforts on lobbying among MPs and government officials could also be supported with research or thematic reviews concerning the implementation of lobbying register in open data format, drawing example from best practices from Europe and beyond. Comprehensive and accessible lobbying data would increase the transparency over the influence on political decision-making by external actors and allow for better scrutiny of parliamentary activities by media, CSOs and the general public.

• The Latvian government should take steps to ensure that the political financing register is available in open and machine-readable format, improving its potential for corruption prevention. KNAB and VARAM, which are already cooperating with regard to data on political financing, should draw example from best practices and international standards in defining the format and characteristic of the register.

• Going beyond the implementation of the 5th EU AML Directive, the Latvian government should release beneficial ownership information on companies, land and properties free of charge and available in open data format, with adequate exemptions for special cases of sensitive information as prescribed by law. This would constitute an added-value for complex anti-money laundering investigations, including those carried out by international watchdogs, media and organised civil society. For this to be possible, the government and VARAM, should work towards sustainable solutions for the financing of the Enterprise Register and State
Land Authority in absence of revenues from the sale of beneficial ownership data.

- **The Latvian government and relevant institutions should ensure that all the available anti-corruption datasets are provided with core metadata and relevant documentation.** This should also apply to all other datasets that the government may consider opening up in the future. In this way, it would be easier for users within and outside the government to understand and work with the data.

- **In accordance with strategic priorities and in cooperation with VARAM, KNAB should take steps to ensure that as many anti-corruption datasets as possible are available through the central open data portal data.gov.lv.** This would ensure that users can easily discover and work with the data and communicate with authorities for the improvement of the quality of the data released.

### Open data for improved governance and better citizen engagement

- **The Latvian government should consider adjusting or improving the existing digital participation platforms in a way that they allow focused consultations with CSOs 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 Latvian government should consider carrying out studies or thematic reviews on the use of open data in the fight against corruption** according to the strategic priorities set out in the national anti-corruption strategy. Such research could be carried out, for example, on lobbying register, beneficial ownership data and voting records. The government might also consider **reporting on how open data has been used to enhance public accountability** in relation to the national anti-corruption strategy. This would help build trust and strengthen collaboration between governments and all sectors of society.

- **In line with the anti-corruption strategy, the Latvian government should consider promoting initiatives targeting media, anti-corruption NGOs and citizen activists to raise awareness on how open data could be used to fight corruption and increase public accountability, leveraging the potential of the existing networks of tech-oriented NGO and associations.** The promotion of such initiatives and would increase society’s overall resilience against corruption and increase trust in public institutions, could be object of a specific commitment in the next OGP action plan.

### Strategic partnerships for anti-corruption open data innovation and international networks

- **The Latvian government should consider forming strategic partnerships with anti-corruption CSOs and the private sector in order to open up key anti-corruption datasets.** This could be done through existing partnerships and frameworks of cooperation and entail the organisation of hackathons, co-creation sessions and workshops aimed at creating visualization tools, apps and digital platforms. This can increase economic output and efficiency in government operations and facilitate the development of new insights, business models and digital innovation strategies.

- **In contributing to the activities of international organisations and multilateral institutions such as the OECD and the OGP, the Latvian government should actively promote the use of open data for public integrity, or proactively import best practices and model apprehended through the participation in such international networks.** In this way, the Latvian government could enhance its impact at the regional and global level, establishing itself among the trendsetters in this field.
Endnotes

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