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

SWEDEN
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 Sweden is a non-profit organisations whose goal is to promote and advance the development of open societies through technology and education in Sweden. 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.

Author: Antonio Greco
Contributor authors: Alina Ostling, Serdar Temiz, Antoni Mickiewicz
Design: Gatis Vectirans, Antonio Greco

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Nordic Council of Ministers

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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, 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 Swedish 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 Latvia 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
CRS - Creditor Reporting System
CSO - Central Statistics Office
DIGG - Agency for Digital Government
EDP - European Data Portal
GDPR - General Data Protection Regulation
IATI - International Aid Transparency Initiative
ICT - Information & Communication Technologies
IODC - International Open Data Charter
NGO - Non-governmental Organization
OECD - Organization for Economic Cooperation & Development
OGP - Open Government Partnership
PSI - Public Sector Information
SIDA - Swedish International Development Agency
SKL - Swedish Association of Local Authorities and Regions
SME - Small & Medium-sized Enterprise
Key Findings

- The Swedish government lacks an official open data policy ensuring that public sector information can be provided as open data. This seems to be a consequence of the high degree of decentralisation and reactive approach to provision of information of much of the Swedish public administration. There seems to be still little awareness about open data principles in large part of the public sector.

- The Swedish government has issued guidelines for the use of open data and set up awareness-raising programmes for anti-corruption. However, while the former seem not to have been effective, overall there has been little integration between the two agendas.

- Only 3 out of 10 key anti-corruption datasets assessed in this study are fully in line with open data standards: the Parliament’s voting records, government budget and spending. There are no datasets published by the government related to lobbying, public procurement and political financing, despite their crucial value for anti-corruption policies. Some Swedish Agencies seem to have adopted open data standards, but they generate consistent part of their revenues through the sale of information, thus raising barriers to public access.

- In general, the use of open data seem not to be high on the anti-corruption agenda of the Swedish government. In general, there seems not to be a specific mechanism for the identification of key anti-corruption datasets, nor initiatives linking open data and anti-corruption in order to tackle the areas where Sweden is most prone to corruption risk. Furthermore, the author could not find evidence of government-funded studies, thematic reviews or toolkits on the specific topic of the use of open data for anti-corruption.

- The Swedish government has some mechanisms in place to boost open data literacy in the country, for example the government network initiative Hack for Sweden, aimed at popularising the concept of open data among public officials and citizens. However, recent international reviews have pointed out that in many cases there is still a substantial disconnection between Swedish public bodies and civil society with regard to data provision.

- Networks of Swedish tech-oriented non-governmental organisations have played a key role in raising awareness about open data in Sweden, also partnering with the government in a number of initiatives fostering the development of open data tools. Though most of these initiatives seemed to have more a focus on public administration efficiency and business development rather than anti-corruption, the vibrancy of the Swedish tech-community seems to have good potential for future initiatives on open data for public integrity.
Key Recommendations

- The Swedish government should engage the new agency for digitalisation (DIGG) and all other authorities involved in open data in order to develop a centralised, simple and shared national open data policy and undertake legal measures to formally enshrine open data principles in PSI law, requiring, for example, that all publicly released information is made ‘open by default’ and under an ‘open license’.

- The Swedish government should take steps to foster an open data culture of transparency and openness among public officials across all the levels of government. This could be done by setting up the right incentive structure for public officials in order to promote an ‘open data’ agenda and raising awareness about the ‘open by default’ principle.

- The Swedish government should consider fostering academic research and commissioning studies or thematic reviews on the application of open data for enhancing public accountability. The findings could be used to update and improve the quality of current anti-corruption strategies, policies and practices.

- The Swedish government should engage with key national agencies 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.

- The Swedish government should establish mechanisms for the identification of key-datasets making up the national anti-corruption data infrastructure and, together with government networks and authorities in charge of open data and anti-corruption, agree on a feasible timeline to release such datasets in open formats.

- The Swedish government should leverage the high level of digital skills and vibrant tech-oriented civil society in the country, by forming strategic partnerships with for the opening up or creation of key anti-corruption datasets.
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.\(^7\)

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 and 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.\(^8\)

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.\(^9\) 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.\(^10\) 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.\(^11\)

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).\(^12\)
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.
2. Note on Methodology

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

• To what extent has the Swedish 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 Sweden 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.

**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

**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.
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**
   i. 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/tblOY2awlnhYUuJze9](https://airtable.com/shrHY9KFJ5bircwvx/tblOY2awlnhYUuJze9)
# Datasets overview

**Company Register** - [http://www.bolagsverket.se/](http://www.bolagsverket.se/)

**Beneficial Ownership Register** - [http://www.bolagsverket.se/](http://www.bolagsverket.se/)

**Senior officials' Directory** - [https://www.government.se/contact-information/](https://www.government.se/contact-information/)


**Government spending** - [https://www.esv.se/psidata/manadsutfall/](https://www.esv.se/psidata/manadsutfall/)

**Parliament's voting records** - [https://data.riksdagen.se/data/voteringar/](https://data.riksdagen.se/data/voteringar/)

**Land Register** - [https://www.lantmateriet.se/en/real-property/Fastighetsinformation/bestall-fastighetsinformation/](https://www.lantmateriet.se/en/real-property/Fastighetsinformation/bestall-fastighetsinformation/)

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**Average score 5.3**
3. Corruption and Open Data in Sweden

Corruption

Sweden has a long tradition of efficiency and transparency in the public administration, good governance and rule of law and has been for several years in the top-10 of the Transparency International’s Corruption Perception Index (CPI). However, there are signals that the situation has been worsening in recent years. From 2015 to 2017, the country’s rank has dropped from 4th to 6th, with a decrease in its score from 89 to 84. Furthermore, recent OECD reviews have shown that levels of public confidence in the Swedish government decreased by 7% between 2007 and 2016.

According to Lotta Rydström, executive secretary of Transparency International’s office in Stockholm, a series of recent scandals might be behind the decreasing citizens’ trust in public institutions. Indeed, in the past two years some Swedish institutions, including the Swedish National Audit Office (Riksrevisionen) and the Tax Agency (Skatteverket) have faced claims of cronyism and cover-ups, while some of the country’s largest businesses, such as Telia and Ericsson, have also faced allegations of foreign bribery.

Furthermore, Rydström has warned that the Corruption Perception Index does not cover Swedish local and regional councils, where much of the political decisions are made (they make up around 70% of the Swedish public administration) and where some risks of corruption do exist. This has been most evident in municipal-level public procurement sector, which according to the 2014 EU Anti-Corruption Report suffers from conflicts of interest and weak auditing procedures, lacking effective control mechanisms to prevent cronyism and nepotism. Public procurement in Sweden is governed by the Public Procurement Act (last amended in 2016), according to which only parties with legitimate interests can have access to information on suppliers and tenders up until the award decision. Only the contract notices need to be published, and there is no obligation to publish such document in a centralized register. This may have negative impacts for the transparency of the overall system.

Political party financing in Sweden is governed by the Act on State Financial Support to Political Parties, the Election Act, last amended in 2014 and the Act on Transparency of Party Financing, last amended in 2016. The legislation places very few bans and limits on both income and spending by parties and does not mandate a centralized register of political financing. Parties are required to keep and publish accounts, although these are limited to income and not expenditure. The Council of Europe has recently expressed concerns about such limits in party reporting, and lack of transparency for entities established for the purpose of resource mobilisation “insamlingsstationer”, which are not obliged to report their income or reveal the identity of their donors.

Even though are no strategic risks related to illicit financial flows in Sweden, some of the biggest Swedish financial institutions have been mentioned in relation to high-end money laundering episodes which have taken place in Eastern Europe in recent years. In August 2017, Sweden has tightened the screws of its anti-money laundering system, approving amendments to the Anti-Money Laundering Act. Under the new law, legal entities must obtain and submit to the Swedish Companies Registration Office reliable information on their beneficial owners and the extent of their interest in the legal entity. The law also mandates that this information must be publicly available, increasing the transparency of corporate interests.

Lobbying is not regulated in Sweden and there is no specific obligation for registration of lobbyists or reporting of contacts between public officials and lobbyists, thus decreasing transparency of the influence on decision-making.
Open Data

Compared to other European countries, Sweden seems to have fallen behind on opening up data and on the re-use of public sector information. Sweden’s ranking on several international open data indices, including the Open Data Barometer\(^3\) and the Global Open Data index\(^4\), has dropped over the past few years. As revealed by a recent OECD review on the issue, at present it is difficult to speak of a proper open data policy by the Swedish government. This is mainly due to the fact that the Swedish public administration is highly decentralized, with weak ministries and strong agencies.\(^4\)

Furthermore, in recent years academics have raised concerns on what kind of impact the long tradition of Freedom of Information has had on the overall openness of the Swedish public administration. According to their arguments, because of this tradition, often Swedish public officials have avoided committing themselves on paper in order to prevent potentially controversial decisions being released into the public domain. This has led to an ‘oral’ culture of policy-making, in which often what is of the greatest public interest is possibly not written down, in fact diminishing the possibility for public scrutiny and damaging the historical record.\(^4\)

Sweden joined the Open Government Partnership in 2011, and since then it has mainly committed to enhancing e-government efficiency, supporting digitisation efforts, release and reuse of public-sector information, increased access to Swedish aid information as well as improved opportunities for dialogue between government and civil society.\(^4\) Sweden’s OGP Action Plan 2016-2018 explicitly gives priority to the development of the economic potential of open data over issues of public accountability.\(^4\)

This despite the 2016 EU Public Accountability Index has revealed that Sweden’s public accountability mechanisms and related legislation are below EU average in terms of effectiveness.\(^4\)

From 2016 to 2018, the National Archives has been acting as the expert agency for open data, having the responsibility for providing support to state authorities in their efforts to open up public sector information. However, recognizing the current problems with open data policies, the government has created a new Agency for Digital Government (DIGG) which has taken over the National Archives’ tasks starting from September 2018.\(^4\) At the local level, the Swedish Association of Local Authorities and Regions (SKL) works to facilitate and support municipalities and county councils in the work of open data.\(^4\)

In contrast with the apparent weakness of the Swedish public administration on open data policies, Sweden has a very active tech-oriented organized civil society which in recent years has strived for popularizing the concept of open data among the public officials and the general public. Sweden also has one of the highest rates of digital literacy in the world, a factor that underlines the potential benefits that could be achieved by a stronger and clearer open data policy by the Government.\(^4\)
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 Swedish government seems to lack an official open data policy. The Swedish Act on the Reuse of Public Administration Documents, transposing the EU Commission’s PSI Directive, entered into force in 2015, with the aim of achieving lower and clearer pricing of accessing government-held information. However, the law does not mention the ‘open by default’ principle or any equivalent statement. Furthermore, the requirement contained in the law, that public sector bodies “generate revenue to cover a substantial part of their costs relating to the performance of their public tasks” is a cause of concern, since depending on the interpretation of the authorities, it may be applied very broadly.

In practical terms, as revealed by a recent OECD review, open data is currently more a set of initiatives developed by a small group of public sectors’ organisations than a whole-of-government effort. This was confirmed by two reports published by the Swedish Agency for Public Management (Statskontoret) in 2015 and 2018, describing the current situation with the reuse of PSI and how the authorities perceive and work with this issue. The reports, based on a survey of more than 300 state and municipal authorities, revealed that only few of them had developed concrete plans to facilitate the reuse of information and provide open data. According to the 2018 survey, as much as 12 percent of the authorities and 39 percent of municipalities and county councils do not even know about the law. A government inquiry and academic studies on PSI in Sweden judged that the law had not been a sufficient incentive for authorities to implement the EU’s PSI Directive. As many authorities at the local level were not even aware of the legal requirement on PSI, they have not even realised the importance of adopting a more proactive approach in making the data more accessible, as opposed to passively waiting for requests of information to come in.

In 2015, the government launched the programme “Digital First”, whose overall aim of is to more open government, by promoting digital innovation and coordination of the Swedish State Administration. However, notably, there was no mention of the public access principle in public declarations about the programme. Despite the clear and comprehensive vision reflected in the Digital First agenda, evidence collected within the frame of this review shows that in terms of digital government, the agenda stands more as a policy statement issued by the Ministry of Finance rather than a vision widely shared, owned and recognised, or even known, by public entities.

According to the OECD, Sweden also lacks an adequate national digital infrastructure to ensure that all government data can be made open by default. Strong decentralization, the lack of cross-ministerial processes and central guidance have led to unstructured and incoherent efforts at the agency level, siloed actions, lack of open data solutions and fragmented IT digital services (a “tangled” IT infrastructure).

In response to all these problems, the government has created a new Agency for Digital Management (DIGG), which will have the overall responsibility
for the digitization of the public sector. The agency has opened on 1 September 2018, taking over the assignments on open data of the National Archives (Riksarkivet) and on the re-use of PSI of the Agency for Economic and Regional Growth. According to DIGG, at present, exchange of information is unnecessarily hindered, leading to lower quality of the services and higher costs.

Open Data Literacy and Anti-corruption awareness

As of October 2018, there was no evidence of training programmes to make public officials aware of the benefits of open data in their role in the fight against corruption specifically. Throughout the period of its assignment on Open Data, the National Archives carried out consultations, held discussions, organised forums for public agencies, and presented best practices about how to best facilitate the reuse of PSI. The national open data portal oppnadata.se also offers an e-learning course on open data, consisting of 16 modules in Swedish, which was developed by the European Data Portal. In addition to the activities of the National Archives, the Swedish e-Delegation and the Swedish Association of Local Authorities and Regions (SKL) have developed and published guidelines on the reuse of PSI. The guidelines contain basic information on the legal framework and on how authorities should work on the reuse of information. However, as seen above, these activities seem not to have resulted in a relevant change of practice in the public sector with regard to open data.

With regard to anti-corruption awareness programmes, in 2017 the government commissioned the Swedish Agency for Public Management (Statskontoret) to establish a state network against corruption, in order to support the authorities in their anti-corruption work. The network mainly function as a platform for anti-corruption learning and exchange of experiences among public officials and it is divided in two groups - one including all authorities that wish to participate, and the other reserved to authorities that make large purchases and whose activity is related to the construction industry. The first group meets four times a year, while the second one six times. Network meetings are usually thematic, although none of them has so far focused on the potential use of open data against corruption. As of September 2018, around 220 state authorities joined the network. Besides managing the anti-corruption network, Statskontoret also makes available informative materials, guidelines and research aimed at fostering an anti-corruption culture in the Swedish public sector. The SKL has also been active in the anti-corruption field at the subnational level, developing an e-education website aimed at elected representatives and officials in municipalities, county councils and regions who intend to launch or further develop a strategic work against corruption.

Data Protection and Right to Information

Sweden has functioning data protection and Right to Information legislation, ensuring that sensitive data and confidential information are removed from the public domain. According to the 1998 Personal Data Act, data controllers - the persons or legal entities who, alone or together with others, decides on the purpose and means of personal data processing - are responsible for taking appropriate measures to protect processed personal data. Once a year, a natural person has the right to request information from a data controller that processes any personal data concerning him or her (free of charge). A data subject also has the right to request that the data controller promptly rectify, block or delete personal data that has not been processed in accordance with the Personal Data Act or any other regulations based on the PDA.

On 25 May 2018, the new EU General Data Protection Regulation (GDPR, in Swedish Dataskyddsförordningen) replaced the Swedish Personal Data Act, and public authorities have started to review their processes of personal data handling. The Swedish Union of Journalists has warned that new GDPR rules might make digital access to public documents more difficult, as some public officials may interpret the new rules by being more restrictive when sending out public documents by email or in digital form.

The Freedom of the Press Act gives the general public the right to read official documents
submitted to or drawn up by the authorities. If unhappy with government decision not to disclose requested information, requesters may complain to Parliamentary Ombudsman (Justitieombudsmännen) who will then give its verdict on the subject. Both complaints and verdicts are public documents and thus subject to the Act. Exceptions to disclosure of information set by the Freedom of the Press Act are defined reasonably and they relate to security matters; the central fiscal, monetary or currency policies; supervisory activities of a public authority; the interest of preventing or prosecuting crime; the economic interests of public institutions; the protection of personal or economic circumstances of private subjects; the preservation of animal or plant species.
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 - 7 out of 10 anti-corruption-related datasets are available in Sweden.
There are no government-published datasets related to public procurement, political financing and lobbying, despite their importance for the transparency of government resources and activities. There is no centralized register with data on public procurement tender and awards even though in practice there is widespread use of private publication services. Swedish political parties are required to publish financial accounts on their website, but reporting is limited and there are no specific requirements for the information to be in open data format, thus decreasing the overall transparency of the political financing system.74 There is no evidence that Sweden is planning to implement a lobbying register in the next future.

Information about legal entities in Sweden, including beneficial ownership75, is available in Bolagsverket’s database.76 It must be noted that, following new anti-money laundering legislation in 201777, Sweden has also set up a register against money laundering where non-financial intermediaries (such as company service providers and traders in high-value goods) must report information about their activities to the Bolagsverket and formally commit to develop procedures to prevent their services from being used for money laundering and terrorist financing.78 The AML register can also be accessed through the Company register. Land and property information on the Land Register can be retrieved in accordance with Right to Information Legislation by contacting Lantmateriet.79

Timeliness - All 7 anti-corruption-related datasets available in Sweden are updated in a timely manner. For example, information in the Bolagsverket is updated no more than 5-7 days after a new legal entity is registered. The process can take more if registration requires further investigation on beneficial owners and other information - in this case, info is updated as soon as the file is complete.80 The Swedish Financial Supervisory Authority (ESV) makes available state spending information on a monthly basis and it also provides independent monthly forecasts for the state budget.81 Voting records on Ryksdag’s website are updated daily.82

Granularity - 6 out of 7 anti-corruption related datasets available in Sweden meet the granularity requirement, providing information at the finest level of aggregation possible. Information on the directory of senior public officials in the government’s website includes only role, email and telephone number83, but details of the role of senior officials are widely explained in the relevant Ministry’s page.84 The Riksdagen’s voting records include data on voting sessions and single votes by MPs.85
Feedback loops

Most of the anti-corruption datasets published in Sweden seem not to allow for feedback on data published. Bolagsverket allows for feedback on data published. Senior officials’ directory seems not to allow for feedbacks. State Budget seems not to allow for feedbacks. Government spending seems not to allow online feedback, but the webpage includes the contact details of the person responsible. The open data webpage of the Voting Records seems not to have an online feedback section, although there is a development blog. Lantamteriet has a chat service for information and feedbacks.

Data Management

The Riskarkivet has provided guidance on data management, archiving and security. However, a recent review OECD has revealed that, in practice, Sweden currently has neither a single public sector data policy nor possesses a government-wide information and/or data governance model to guide the management, sharing, and use of data within and across public sector institutions. It seems that data governance arrangements rely on a legacy of organisational and transactional working methods which have led to stagnated development of a data-driven public sector and to fragmented efforts. According to Swedish stakeholders interviewed by OECD, this is the result of the lack of a strategic approach in defining objectives, limited coordination in policy implementation, insufficient cross-government communication channels and a focus on processes more than on outcomes.
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

The national Open data portal (opnadata.se) was launched in 2012. As of August 2018, many national authorities (87), one regional authority and a few local authorities (8) have posted dataset links on the Open Data portal. Government spending seems to be the only datasets available in the central open data portal. This makes it harder for users to identify and operate with the datasets, as they have to go through several websites. The portal has recently been criticised by the OECD for the lack of advanced functions such as the possibility of enabling the portal as a user-driven platform where users can add datasets that can be used by other users from the ecosystem, register their own organisations as data publishers, and engage in discussions with other users centred on their datasets.

Formats - 6 out of 7 datasets available in Sweden are downloadable in machine-readable format. The only dataset which does not meet this requirement is the directory of senior public officials. Bolagsverket offers a ‘XML package’, through which information contained in the Company Register (including information on beneficial ownership and AML register) can be retrieved in XML format, thus meeting the open data format requirement. The Riksdag’s website provides voting records information in a range of machine-readable formats (csv, xml, json, sql). The Lantmateriet provides download services for property information, which are integrated into the Customer Portal. The services allow users to download data in XML format and use the information in their own systems and applications. The delivery and data download take place at the customer’s initiative through machine-to-machine interface.

Openness - Only 4 out of 7 anti-corruption-related datasets in Sweden are free of charge and reusable with no restrictions: the public officials’ directory, government budget, government spending and voting records. Even though information in the Bolagsverket database can be reused freely, with the only requirement to cite the source, the XML package can only be purchased for a fee and requires a client certificate that can be ordered at Expisoft in the form of a server ID. In addition, beneficial ownership information requires a Mobile Bank ID. The use of personal data in the Swedish Land Register is governed by the Act on Property Register and the General Data Protection Ordinance (GDPR). Before accessing data in real estate registers, Lantmateriet requires an application explaining the purpose of the information request (see application for direct access). Fees must be paid in order to get the information.

Accessibility - The only 4 datasets accessible without registration are the public officials’ directory, government budget and spending and voting records. Information on Swedish companies can be purchased for a fee as either one-off access for 48 hours or unlimited access, for which registration to Bolagsverket is required. As mentioned above, the Land register requires an application for direct access in order to obtain information.
The Swedish government has generally supported initiatives on digital literacy for public authorities and civil society. Until the end of August 2018, the National Archives was in charge of promoting data literacy in civil society. As mentioned above, activities in this regard included a translation in Swedish of the e-module training developed by the European Data Portal (EDP). Since September 2018, the new Agency for Digital Government (DIGG), is in charge of promoting data literacy among the civil society. At the time of the writing the activities of the Agency had not yet started. However, according to the webpage, the agency will cooperate with various partners, including government agencies and CSOs for the promotion of open data and digital skills. According to Antoni Mickiewicz, expert at Open Knowledge Sweden, DIGG has the potential to take the mantle on the large training events industry in the country in order to foster open data literacy. This, however, will depend on the organisation’s capacity to implement planned policies.

More recently, in May 2018 the Swedish National Digital Skills and Jobs Coalition was launched in Stockholm with the goals of developing public sector leadership skills, implementing the national strategy for the digitalization of the school system, raising interest in IT among young people and women, skills uptake and life-long learning as well as immigration and integration and digitalized society available and usable for all citizens.

The Swedish Digital Skills and Jobs Coalition is made up by the Government’s Digitalisation Council (Digitaliseringsrådet), Swedsoft, the Swedish National Agency for Education (Skolverket), the Swedish Association of Local Authorities and Regions (SKL), the Association of Swedish Engineering Industries (Teknikföretagen), the Internet Foundation in Sweden (Internetstiftelsen i Sverige) and the Swedish IT and Telecom Industries.

One of the most recent and popular initiatives to promote open data literacy among citizens was the ‘All Digital Week 2018’, which took place throughout Sweden in March 2018. The initiative was run by the Swedish Network Organisation ‘Digidelnätverket’, in partnership with the Swedish government. According to the webpage of the initiative, the nation-wide campaign week took place in more than 90 different locations, 225 event organizers and partners managed to arrange more than 450 different events reaching 6,000 participants. The events had an emphasis on digital media literacy, online integrity and public e-services. According to Digidelnätverket, the initiative helped to foster regional cooperation between ICT-centres, local public authorities, NGOs and the private business sector. In 2018, the Digidel network has been awarded a grant by the government agencies to establish a central campaign and coordination function. In the framework of the Government programme “Digital first”, Didgidel has to organise the Medborgarevecka, an initiative aimed at promoting citizen-centred e-services.
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 7 datasets available in Sweden seems to be in line with open data standards allowing for interoperability (Company and BO Register, Government Spending, Voting Records and Land Register. Government budget is available in xslx, so it should meet this requirement\(^6\)). As the Directory of public officials is not available in open data format, it does not meet any of the requirements of this principle.

**Metadata** - The same 6 datasets in line with open standards also provide core metadata (descriptive title, publication, source, formats).

**Documentation** - With regard to documentation, the available datasets in open data standards also have relevant accompanying documentation that is adequate to understand the source and analytical limitations of the data. The Company Register\(^12\) and ESV\(^13\) provides all the necessary documentation to operate with the data (instructions for use and limitations). Riskdag’s website has a section dedicated to documentation accompanying the data provided (instructions for use, characteristics and technical limitations of the data etc.\(^14\) Detailed accompanying documentation for the use of the data in the Land Register is provided in the web page relative to download services.\(^15\) Government budget seems not to have documentation explaining how to use the data, even though there is a link redirecting users to ESV, government spending website, where adequate documentation is provided.
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 Swedish Government seems not to have promoted the use of specific digital participation platforms to engage with anti-corruption organisations. In the 3rd OGP action plan (2016-2018) Sweden committed to improve opportunities and strengthen channels for dialogue and transparency in aid management in response to the reported lack of involvement of CSOs in the development of aid policy. However, according to the OGP assessor for Sweden Alina Ostling, no digital platform was created, only a website.

Toolkits

There seem not to be specific toolkits for the fight against corruption through open data in Sweden. Sweden’s Open Data portal oppnadata.se has a page dedicated to good examples of open data usage in a wide range of fields. However, as of September 2018, none of them seems to be specifically focused on corruption. Likewise, Statkontoret and SKLs webpages on anti-corruption provide toolkits, guidelines and examples related to corruption, but none of them seems to be related to open data.

Research and reporting

As of September 2018, there was no evidence of government-funded studies, thematic reviews or reporting on how open data has been used to increase public accountability and corruption prevention. In general, the connection between the two policy areas seems to have largely been unexplored.

Interaction mechanisms and civic engagement

Sweden has one of the most digitally savvy populations in Europe and in the world when it comes to familiarity with the internet and its adoption in their daily lives. However, according to a recent OECD review, there seems to be disconnection between most public sector bodies, and the external vibrant tech ecosystem in the country which has limited the adoption of user-driven approaches for policy making. While final users and citizens have not been involved in the making of ICT development policies, practices around users’ needs are still grounded on an e-government user-centred approach where those needs are assumed but not explored and are not placed at the core of problem solving and policy design processes.

Despite this, there is some evidence that Sweden has in place some mechanisms to encourage the use of open data by citizens. Hack for Sweden,
for example, is a government network initiative whose objective is to increase the application of open data in Sweden, foster citizen-driven innovation and cooperation. This has included events on the benefits of open data for resolving societal challenges and increasing government transparency and accountability, such as the one organized in the annual “Almedal Week”. The “festival” organized since 1968, has been an important meeting hub between political parties, organized civil society and citizens.

Swedish tech-oriented organised civil society has also been particularly active in popularising the concept of open data and its potential benefits on public accountability. For example, in 2016, 2017 and 2018 Open Knowledge Sweden organised the Open Knowledge Awards, the first award event on open knowledge in Sweden, covering categories such as transparency, entrepreneurship, open science, ministry/municipality and business initiative. A jury, consisting of experts and researchers in open knowledge related domains, had to determine the most exemplary initiative in favour of open data, open knowledge and transparency according to the category. In the last couple of years Open Knowledge Sweden also participated in the EU-funded CLARITY project, aimed at mobilising and engaging with the multidisciplinary network of stakeholders across the European open eGovernment ecosystem in order to understand gaps in the market to support the growth in innovation in open eGovernment applications and develop a blueprint for the future of open eGovernment in Europe. The project also included initiatives on government transparency and public integrity. Furthermore, in 2014 the organisation joined the Open Knowledge-led global campaign “Stop Secret Contracts” calling for more openness and transparency in public contracts around the world. Another important initiative in the field of open data was the Nordic Open Data Forum organised in Stockholm in 2017 by the Swedish Internet foundation. The forum brought together open data experts, citizens and CSOs from all the Nordic countries to explore synergies at the regional level. Activities included workshops, public discussions and presentations.
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

Anti-corruption seems not to be high in the open data agenda of the Swedish government. The latest OGP action plan explicitly gives priority to business development rather than public accountability. Although public authorities such as the Agency for Public Management (Statskontoret) and the SKL have been actively engaged in corruption prevention, as of November 2018 there was no evidence of other outstanding initiatives linking open data and anti-corruption in order to tackle the areas where Sweden is most prone to corruption risk. According to a scholarly article by Temiz and Brown, who studied the open data phenomenon in Sweden using the city of Stockholm as level of analysis, transparency and accountability was not the main focus of open data initiatives there. Citizens did not have opportunity to influence government processes besides accessing policy documents in pdf format and accessing information digitally.

International Networks

As founder member and one of the biggest aid donors in the world, Sweden has contributed to the Secretariat of the International Aid Transparency Initiative (IATI) - a global initiative to improve the transparency of development and humanitarian resources - with in-kind personnel support and shared its experience in working with the IATI standard from a donor perspective. Moreover, Sida has made available Openaid.se as an open source platform for other IATI publishers to use in whole or in part and has provided support to several organisations in trying out the software.

Open Data Tools

There is evidence that the Swedish government has supported a number of initiatives fostering the development of tools based on open data, even though these seem not to have been specifically related to anti-corruption. Since 2014, Hack for Sweden has annually organized hackathons gathering students, developers, data...
journalists, innovators, and entrepreneurs. Though the specific “challenge” varies year by year, the common purpose is to use data in Sweden’s open data portal oppnadata.se in order to create apps and tools useful for tackling societal challenges and/or improving public services.\textsuperscript{132} The Swedish Agency for Economic and Regional Growth is currently running a pilot initiative called “Digilift” (Digilyftet in Swedish), whose purpose is to help industrial companies and industry-related service companies benefit from innovation in digital technologies.\textsuperscript{133} A scholarly article from Kassen, the case of Sweden has demonstrated the importance of cooperation with the representatives of the local non-governmental sector, whose active participation is crucial for the overall progress of the open data movement, to a greater degree, as a philanthropic phenomenon rather than a business incubator.\textsuperscript{134}

Despite these efforts, the OECD has recently been critical on Sweden’s capacity to develop innovative tools based on open data. According to the review, there is no natural traction for digital and data-driven innovation due to a risk-averse and compliant organisational ethos.\textsuperscript{135}
Conclusions

Open by Default

The Swedish government still lacks an official open data policy and an adequate national digital infrastructure to release public sector information as open data. This seems to be a consequence of the high degree of decentralisation and reactive approach of much of the Swedish public administration, the latter legacy of a century-long and widespread culture of “oral policy-making”, which experts consider damaging for the long-term collection of public records. Moreover, media and civil society organisations have raised concerns that the new EU General Data Protection Regulation may complicate efforts to open up public sector information, as public officials may interpret new rules in more restrictive manner.

The Swedish government has set up trainings and awareness-raising programmes for the use of open data in the state administration. However, these seem to have had little impact on public administration practices. Recent surveys and reviews by the government and international bodies have shown that there is still little awareness about open data principles in large part of the public sector. The government has also set up programmes for anti-corruption awareness, but none of these included open data as key element.

Timely and Comprehensive

The Swedish government has made available online 7 anti-corruption datasets out of 10 assessed in this study, all of them updated in a timely manner and at a granular level. There are no datasets published by the government related to lobbying, public procurement and political financing, despite the fact that these are all areas where Sweden has been found to lag behind. Most of the existing anti-corruption-related datasets in Sweden assessed in this study seem not to allow for feedback on the published data, with potential negative effects on its quality. The situation is complicated by the current lack of a government-wide data governance model to guide the management, sharing, and use of data within and across public sector institutions.

Accessible and Usable

Only 1 out of 7 anti-corruption datasets available in Sweden is retrieveable in the Swedish central open data portal oppnadata.se, the government spending. Moreover, the dataset is only partially uploaded in the portal, and more data is available in the website of the publishing agency. This may have negative impacts on public transparency and anti-corruption policies, as it would make harder for data users to identify and work with the datasets, resulting in missed opportunities for public integrity.

Even though 6 out of 7 anti-corruption datasets in Sweden are available in open formats, only 3 of them meet also the requirements of openness and accessibility. Despite the key importance of company and land register for anti-money laundering, Bolagsverket and Lantmateriet, both seem to have adopted a business model of service provision according to which can be provided in open data format and freely reused in exchange for strict registration requirements and the payment of fees to have unlimited access. At present it seems very difficult that the situation could change, as both agencies finance large part of their activities through the sale of data.

The Swedish government has promoted digital and open data literacy among citizens and the public sector. This has taken place through the creation of the National Digital Skills and Jobs coalition, online training, and awareness-raising campaigns. The government has also set up a network initiative in the public sector, Hack for Sweden, aimed at fostering the use of open data among public officials and citizens. This network may represent a potential vehicle to foster an anti-corruption culture based on open data in the future.
Comparable and Interoperable

6 out of 7 anti-corruption datasets in Sweden are in line with open data standards for comparability and interoperability and include core metadata and accompanying documentation (except the government budget). This indicates that despite the lack of a clear identification mechanism for key anti-corruption datasets, publisher agencies have implemented high standards. Though in general this is a positive factor for cross-border investigative cooperation on corruption and money laundering, the business models in force for Companies' and Land Registers represent a significant barrier for media and civil society organisations investigating corruption.

For Improved Governance and Citizen Engagement

The Swedish government seems not to make use of specific digital participation platform to determine data needs of anti-corruption CSOs. Under the OGP process the government has regularly engaged with CSOs working for Aid funds transparency but is not clear to what extent this involved digital participation platforms.

Even though some government agencies provide good examples and toolkits both in the field of open data and anti-corruption, such instruments seem not to be integrated. At the same time, there is no evidence of government-funded studies or reporting on the specific topic of open data and its use against corruption. The Swedish government has some mechanisms in place to boost data literacy among its population, that has one of the highest digital skills level in the world. Despite this, there seems to be a disconnection between most of the public sector and citizens. This is due to the scarce awareness of open data principle among Swedish public officials. Swedish tech-oriented organized civil society has played a particularly important role in popularizing the concept of open data among the population, though very few initiatives specifically focused on the use of open data against corruption.

For Inclusive Development and Innovation

Anti-corruption seems not to be high on the open data agenda of the Swedish government, with the exception of aid transparency. In general, there seems not to be a specific mechanism for the identification of key anti-corruption datasets, nor initiatives linking open data and anti-corruption in order to tackle the areas where Sweden is most prone to corruption risk.

Sweden has contributed to the IATI Secretariat with in-kind personnel support and shared its experience in working with the IATI standard from a donor perspective.

Through the Hack for Sweden network and other agencies, the Swedish government has supported a number of initiatives fostering the development of open data tools, in partnership with civil society organisations. Though most of these initiatives seemed to have more a focus on public administration and efficiency rather than anti-corruption, the vibrancy of the Swedish tech-community has good potential for future engagement on open data for anti-corruption.
Recommendations

A centralised, simple and shared national open data policy

- The Swedish government should engage the new agency for digitalisation (DIGG) and all other authorities involved in open data in order to develop a centralised, simple and shared national open data policy and build an adequate national digital infrastructure allowing for the release of public sector information as open data. This could be done through existing discussion for and included as a commitment in the next OGP action plan.

- The Swedish government should undertake legal measures to formally enshrine open data principles in PSI law, requiring, for example, that all publicly released information is made ‘open by default’ and under an ‘open license’. This would contribute to ensure the delivery and enforcement of such principles by public agencies across the country.

- The Swedish government, in cooperation with DIGG, should design strategic centralised policies and establish a government-wide information and/or data governance model to guide the management, sharing, and use of data within and across public sector institutions. This would help reduce the current fragmentation of efforts by public bodies and save energy and resources. Further funding should be made available to train municipal and regional officials in standards, security, and harnessing open data for their own work.

- The Swedish government should take steps to foster an open data culture of transparency and openness among public officials across all the levels of government. This could be done by implementing nation-wide awareness-raising programmes on setting up the right incentive structure for public officials in order to promote an ‘open data’ agenda and raising awareness about the ‘open by default’ principle. To ensure the delivery across decentralized public agencies, the government could consider a) undertaking ‘soft reforms’ with the aim of releasing public information in open data formats, for example as part of customer service targets and civil service codes of conduct; and b) establishing a reward system for those units publishing information in an open data format.

A stronger awareness of the linkage between open data, anti-corruption policies and public accountability mechanisms

- The Swedish government should open a dialogue with media and organised civil society with the aim of clarifying whether and how the new EU General Data Protection Regulation might affect the disclosure of public sector information as open data and taking measures to reduce the risk that new rules lead to decreased public access to anti-corruption data and reduced public accountability.

- The Swedish government should consider integrating and promoting the use of open data among the topics of discussion of the national anti-corruption network, in line with strategic national anti-corruption priorities. This would foster mutual understanding of the potential benefits of open data for public accountability.

- The Swedish government should consider fostering academic research and commissioning studies or thematic reviews on the application of open data for enhancing public accountability and use the findings to update and improve the quality of current anti-corruption strategies, policies and practices, including awareness-raising programmes, guidelines and toolkits for public officials.

- The Swedish government should engage and foster cooperation between the national anti-corruption network, SKL, the DIGG and Hack for Sweden with the goal of providing cross-departmental trainings and courses aimed at building the capacity of public employees to use open data to prevent and/or identify corruption. This could also entail designing toolkits, guidelines and best examples and 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).
A renewed national anti-corruption data infrastructure

- In line with goals and strategic priorities set out in the current national anti-corruption agenda, the Swedish government should establish mechanisms for the identification of key-datasets making up the national anti-corruption data infrastructure and, together with government networks and authorities in charge of open data and anti-corruption, agree on a feasible timeline to release such datasets in open formats.

- The Swedish government should consider implementing centralized registers of public procurement, political parties financing and lobbying in open data format. This would help improve public accountability mechanisms and increase the overall transparency on the use of resources by government, public bodies and political representatives.

- The Swedish government should take steps to increase the number of key anti-corruption datasets available in machine-readable formats without restrictions of access or reuse, following the example of the Riksdag’s open data portal. Whereas this might be straightforward for the government budget and the public officials’ directory, it might result more complicated with regard to Company Register, Beneficial Ownership Register and Land Register, as it also requires a radical change of business model by the government agencies holding these data (Bolagsverket and Lantmateriet). As such, the Swedish government might consider allocating more funds to these agencies in order to cover for lost revenues, in the case the data is made available for free.

- The Swedish government should ensure that the existing anti-corruption datasets are in line with open data standards and include core metadata and relevant documentation. This should also apply to all other datasets that the government may consider opening up in the future. This would increase the quality of Swedish datasets in the context of cross-border corruption investigation, increase the possibility for cross-referencing among datasets and make it easier for users within and outside the government to understand and work with the data.

- The Swedish government should ensure that all key anti-corruption datasets are easily identifiable and available on the central open data portal. This would make it easier for users to discover and work with the datasets, as they would not have to go through several websites and requests for information in order to retrieve the data.

- The Swedish government should encourage agencies responsible for releasing anti-corruption-related data that the location through which they are provided, including the central open data portal, allows for feedback mechanisms on published data and forums for discussion. This would help agencies to improve the quality of data in line with the actual needs of data users and improve to the overall efficiency of the system.

Open data for improved governance and better citizen engagement

- The Swedish government should promote and take steps to implement digital participation platforms to determine data needs from anti-corruption civil society organisations and media at the national level. This would foster common understanding of decision making-processes and cooperation in the development of anti-corruption policies and contribute to more efficient and speedy access to information procedures related to anti-corruption data.

- The Swedish government should leverage the high level of digital skills and vibrant tech-oriented civil society in the country, by 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.
Strategic partnerships for innovation in the use of open data for anti-corruption

• The Swedish government should explore the possibility to form strategic partnerships with anti-corruption NGOs, tech-oriented civil society, media and citizen activists in order open up or create key anti-corruption datasets, such as registers on lobbying, public procurement and political financing. This could 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 with personnel and technical expertise to international organisations, the Swedish 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. In this way, the Swedish government would enhance its impact at the regional and global level.
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