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A map of the Baltic region, showing the outlines of Finland, Sweden, and Latvia. The map is overlaid on a dark blue background with a network of white lines and dots, resembling a globe or a data network. Three colored dots are placed on the map: a yellow dot in Finland, a blue dot in Sweden, and a red dot in Latvia.

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

Transparency International Latvia (Sabiedrība par atklātību – 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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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

This report is the general overview of a study 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 and identifying opportunities for knowledge transfer and regional cooperation. The study also includes specific reports assessing to what extent the Latvian, Swedish and Finnish government have implemented internationally agreed-upon open data principles as part of their anti-corruption regime and providing recommendations for further improvement at the national level.

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

CSO - Civil Society Organisation

DIGG - Swedish Agency for Digital Government

EU - European Union

EITI - Extractive Industries Transparency Initiative

GDPR - General Data Protection Regulation

IATI - International Aid Transparency Initiative

ICT - Information & Communication Technologies

IODC - International Open Data Charter

LATA - Latvian Open Technology Association

NGO - Non-governmental Organization

OECD - Organization for Economic Cooperation & Development

OGP - Open Government Partnership

OKFI - Open Knowledge Finland

PSI - Public Sector Information

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 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;

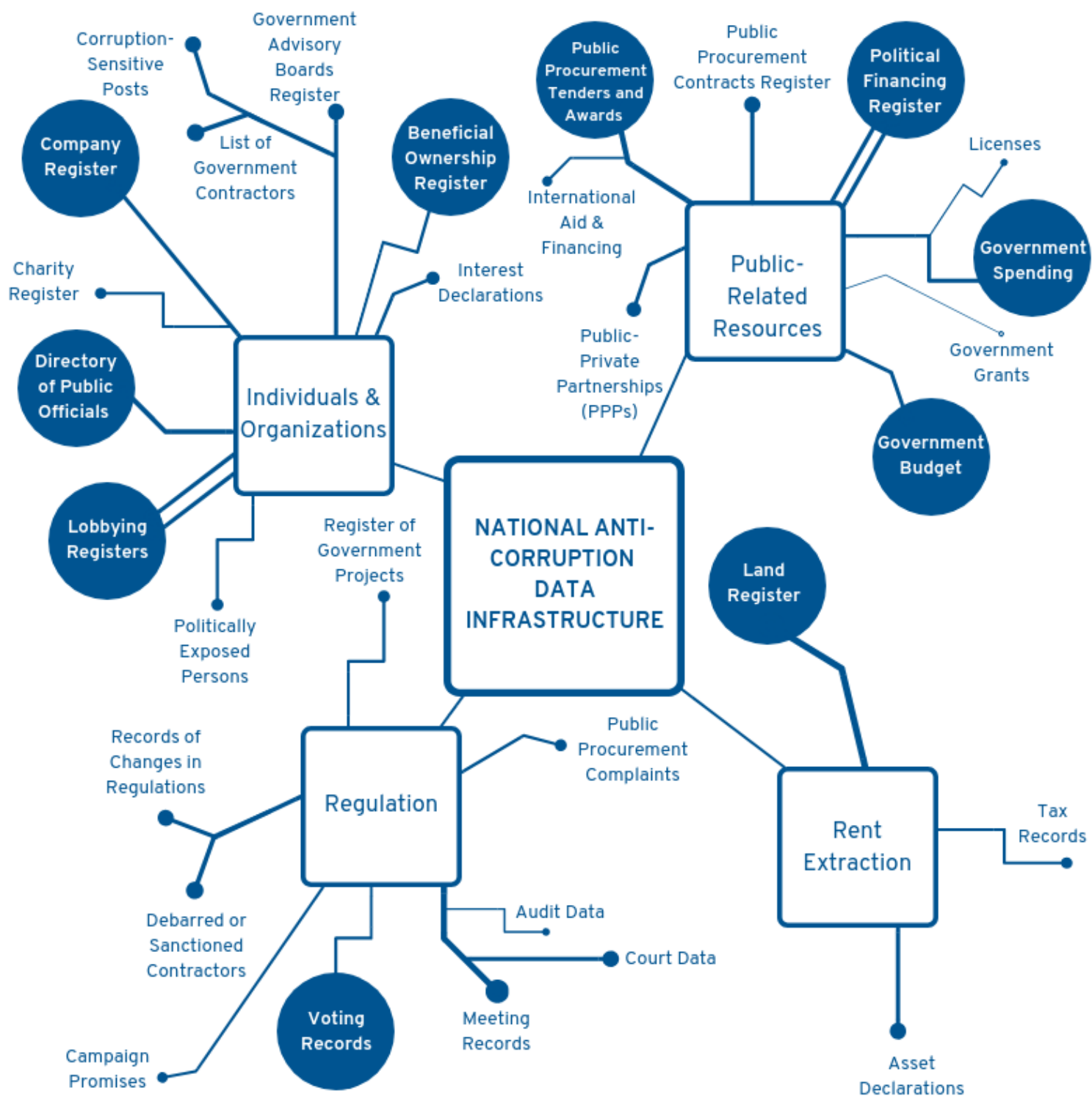
- open data of all forms can be part of the evidence in a case around corrupt activity;
- open data on courts, enforcement and sanction processes can be used to scrutinise the effectiveness of the enforcement system itself, and to highlight areas in need of systemic improvement.¹⁷

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.²⁰ In the spirit of multi-stakeholder collaboration, OGP is overseen by a Steering Committee including representatives of governments and civil society organizations. In order to further improve civil society's capacity to foster public integrity through open data, there is a need for programmes, training workshops, tools or guidelines aimed at improving data literacy among anti-corruption professionals and activists.

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

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



2. Note on Methodology

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

- **To what extent have Latvia, Sweden and Finland have implemented open data principles as part of their 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, Sweden and Finland have all signed.²⁴ 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.²⁵

Anti-corruption datasets

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

LOBBYING REGISTER



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

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

COMPANY REGISTER



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

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

BENEFICIAL OWNERSHIP REGISTER



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

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

PUBLIC OFFICIALS DIRECTORIES



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

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

GOVERNMENT BUDGET



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

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



GOVERNMENT SPENDING

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

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



PUBLIC PROCUREMENT

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

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



POLITICAL FINANCING

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

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



VOTING RECORDS

Data repository that registers the votes that are made individually by the members of legislative bodies, according to their mandate. Data about every parliamentary 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 cross-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 questions²⁷

1. Dataset

The dataset is made available online in any form.

2. Timeliness

The dataset is timely and updated regularly.ⁱ

3. Granularity

The dataset is released at the finest level of granularity available without data aggregation.ⁱⁱ

4. Format

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

5. Openness

The dataset is free of charge under an open and unrestricted licence.⁶⁰

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 includes 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.

ⁱ. The requirement of timeliness was applied subjectively by the author, according to observed evidence of international practice as well as expert advice 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 advice 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/tblOY2aw1hYUuJze9>

DATASETS OVERVIEW - LATVIA

	Data	Time	Granularity	Format	Openness	Accessibility	Open standards	Metadata	Documentation	
Lobbying Register										0
Company Register										9
Beneficial Ownership										3
Public officials directories										5
Government budget										9
Government spending										8
Public Procurement										9
Political Financing										5
Voting records										9
Land Register										3

Average score 6.0

Company Register - <https://data.gov.lv/dati/lv/dataset/uz>

Beneficial Ownership Register - <https://www.latvija.lv/lv/Epakalpojumi/EP120/Apraksts>

Public officials' directories (examples) - [Cabinet of Ministers https://www.mk.gov.lv/en/kontaktkatalogs](https://www.mk.gov.lv/en/kontaktkatalogs)

Ministry of Foreign affairs - <http://www.mfa.gov.lv/ministrija/kontaktinformacija/arlietu-ministrijas-talrunu-saraksts>

Government Budget - <https://data.gov.lv/dati/lv/dataset/2018-gada-valsts-budzets>

Government Spending - <https://www.kase.gov.lv/parskati/kopbudzeta-izpildes-parskati>

Public Procurement - <https://data.gov.lv/dati/lv/dataset/publisko-iepirkumu-pazinojumi>

Political Financing - <https://www.knab.gov.lv/lv/db/donations/>

Parliament's voting records - <https://data.gov.lv/dati/lv/dataset/saeimas-sedes>

Land Register - <http://www.vzd.gov.lv/lv/pakalpojumi/datu-izsniegšanas-pakalpojumi/kadastra-dati/portals-teksta-dati-vienreizejie/#Par-e-pakalpojumu>

DATASETS OVERVIEW - SWEDEN

	Data	Time	Granularity	Format	Openness	Accessibility	Open standards	Metadata	Documentation	
Lobbying Register										0
Company Register										7
Beneficial Ownership										7
Public officials directories										5
Government budget										9
Government spending										9
Public Procurement										0
Political Financing										0
Voting records										9
Land Register										7

Average score 5.3

Company Register - <http://www.bolagsverket.se/>

Beneficial Ownership Register - <http://www.bolagsverket.se/>

Senior officials' Directory - <https://www.government.se/contact-information/>

Government Budget - <https://www.regeringen.se/sveriges-regering/finansdepartementet/statens-budget/statens-budget-som-excel/>

Government spending - <https://www.esv.se/psidata/manadsutfall/>

Parliament's voting records - <https://data.riksdagen.se/data/voteringar/>

Land Register - <https://www.lantmateriet.se/en/real-property/Fastighetsinformation/bestall-fastighetsinformation/>

DATASETS OVERVIEW - FINLAND

	Data	Time	Granularity	Format	Openness	Accessibility	Open standards	Metadata	Documentation	
Lobbying Register										0
Company Register										9
Beneficial Ownership										0
Public officials directories										9
Government budget										9
Government spending										9
Public Procurement										5
Political Financing										9
Voting records										8
Land Register										3

Average score 6.1

Company Register - https://www.avoindata.fi/data/en_GB/dataset/prh-avoin-data

Public Officials Directory - <https://yhteystietohakemisto.valtori.fi/en>

Government Budget - https://www.avoindata.fi/data/en_GB/dataset/valtion-budjettitalous

Government Spending - <https://www.avoindata.fi/data/fi/dataset/valtion-virastojen-ostolaskut>

Public Procurement - <https://www.hankintailmoitukset.fi/fi/>

Political Financing - <https://www.vaalirahoitusvalvonta.fi/en/index.html>

Voting records - <http://avoindata.eduskunta.fi/help.html>

Land Register - <https://www.maanmittauslaitos.fi>

Open Data Principles

The background of the slide is a dark blue field covered with a repeating pattern of lighter blue hexagons. Scattered across this field are several three-dimensional cubes. These cubes are rendered in various shades of blue, from light to dark, and are positioned at different depths, creating a sense of perspective. Some cubes are more prominent and in focus, while others are faded or partially obscured by the grid pattern.

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 anonymised 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

Whereas Latvia and Finland in recent years have implemented relevant legislation and policies for the provision ‘open by default’ government data, Sweden has lagged behind on this aspect.

The lack of an official open data policy by the Swedish government, together with the high degree of decentralisation characterising Swedish public administration, seem to have resulted in little awareness about open data principles among public institutions and officials across the country.²⁸ Some agencies do adopt open data practices, but these mostly represent “siloed” initiatives rather than a whole-of-government effort.²⁹ Furthermore, in contrast with Latvia and Finland, where a culture of open data in public administration seems to be emerging, in Sweden many among public officials still adopt a “reactive approach” to the provision of public information - legacy of centuries-long tradition of Freedom of Information.³⁰ This suggests a need for the Swedish government to adopt a more centralised and strategic approach to the link between Open Data and Right to Information.

anti-corruption policies, there seems to be little or no integration between the agendas of the authorities implementing them. As a consequence, crucial opportunities in the field are being missed.

Data Protection and Right to Information

All three countries have functioning data protection and Right to Information legislative frameworks in line with international standards, ensuring personal privacy and confidentiality with regard to national security, trade secrets and intellectual property. However, there seems to be uncertainty with regard to the impact of the new EU General Data Protection Regulation (GDPR) on policies and practices concerning information disclosure and open data. In Sweden in particular, media and civil society have raised concerns that the new GDPR may actually result in less data provided in open formats.³¹ In this regard, Finland has shown the way with the development of the MyData concept, one of the most innovative approaches at the global level for the harmonisation of stricter data protection rules in an open data environment.³²

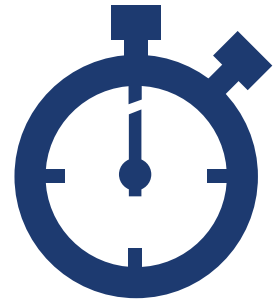
Open Data literacy and anti-corruption awareness programmes

Overall, there seems to be a lack of specific trainings for public officials on the use of open data for anti-corruption. Even though governments in all three countries have in place trainings, programmes and guidelines respectively for raising awareness on open data and national

Principle 2

Timely and Comprehensive

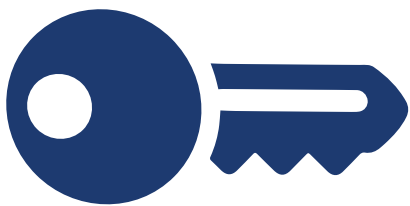
The second principle encourages governments to implement mechanisms for the identification and release of specific anti-corruption related datasets, whose data should be accurate, timely and up to date, and published at a disaggregated level. Governments should allow users to provide feedback and continue 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.



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



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.

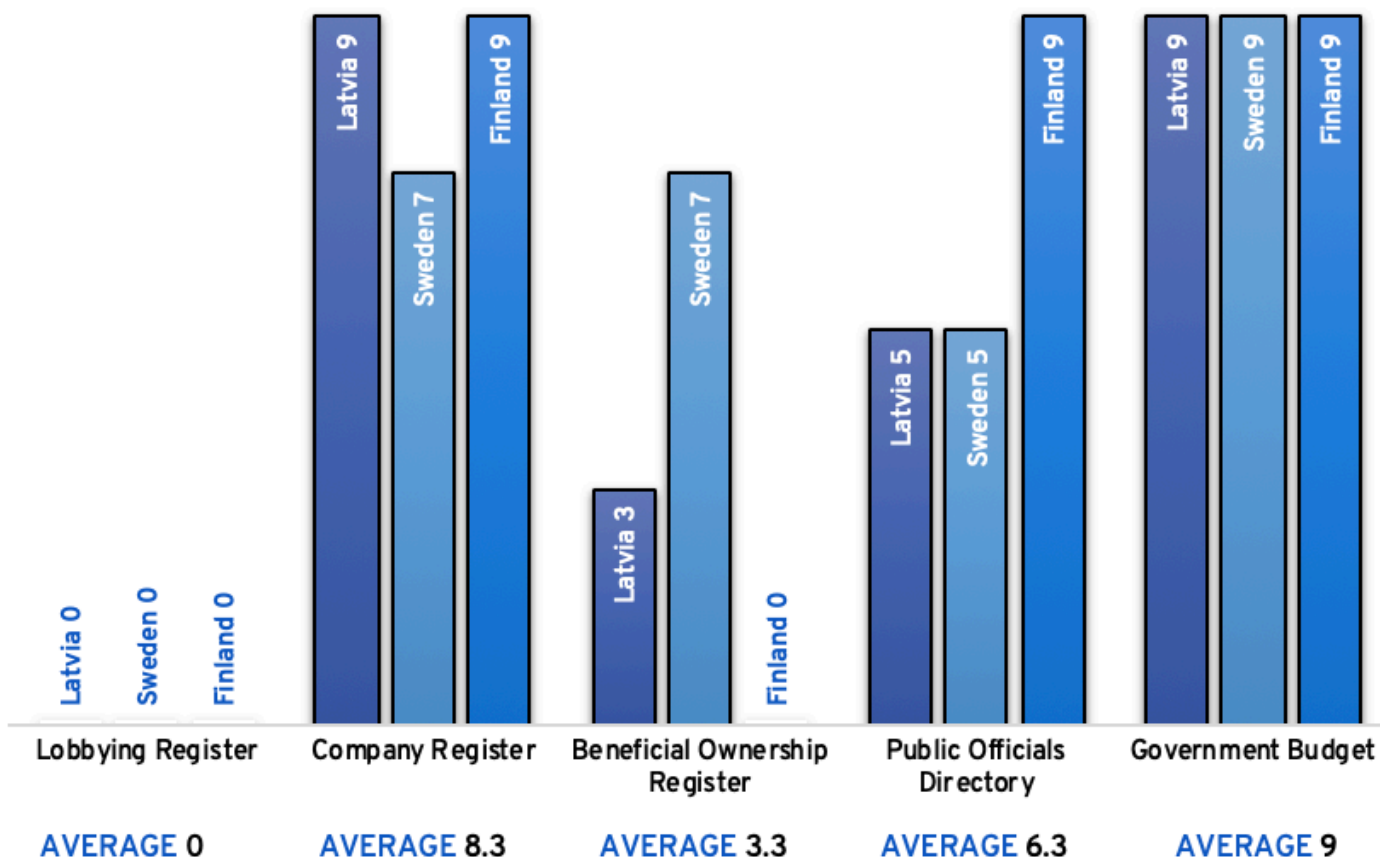


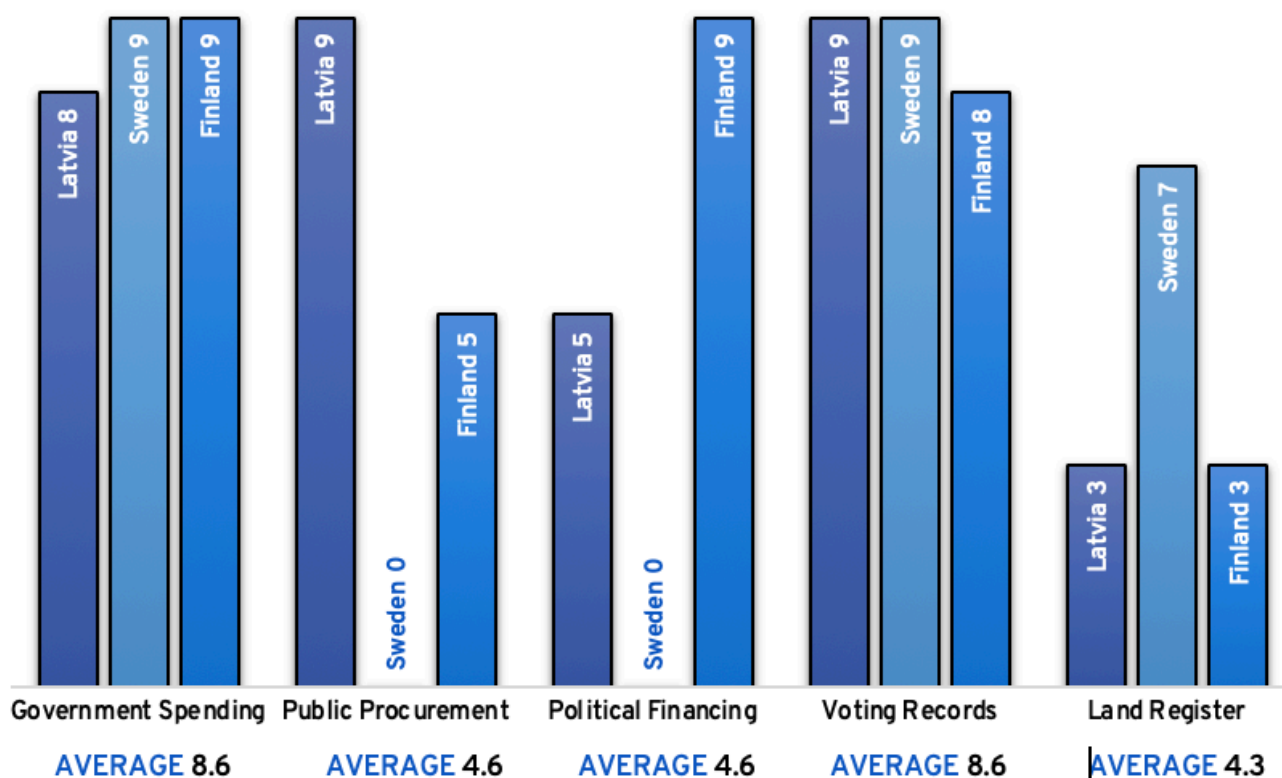
Overall, the findings of this research show that **there is considerable potential for the improvement of open data standards of the anti-corruption data infrastructure in the three countries**, suggesting a need for a more strategic approach towards the issue and better mechanisms of identification of key anti-corruption datasets in line with current anti-corruption policies and priorities.

Latvia is the country where most of the anti-corruption datasets analysed in this study were made available (9), however, only 4 of them meet all the open data requirements, underlining a potential for substantial improvement. **Finland has the highest average score (6.1) and highest number of datasets meeting all open data standards (5).** In Sweden the situation is slightly more concerning. Only 3 datasets, the Swedish Parliament's voting records, government budget and spending, meet all open data standards. Sweden also lacks centralised registers of public procurement tenders and awards and political financing, both considered of key value for public accountability.

None of the three countries currently has a lobbying register, with potential negative impacts on the transparency of the influence on decision-making. This is due to the fact that lobbying is not yet regulated in any of the three countries. The Finnish government seems to have taken steps in this regard and has explored the possibility of implementing such register in the future.³³ In Latvia, lobbying regulation is still being discussed by lawmakers with little progress.³⁴ In Sweden, on the other hand, there is no evidence of current plans for regulating lobbying.

Beneficial ownership and land registers, both particularly important for the fight against money laundering, do not meet all open data standards in any of the three countries. In Latvia and Sweden, access to the two datasets requires registration to e-services and the payment of fees with the only difference that the Swedish company register allows for the download of information in machine-readable formats³⁵, while Latvia's e-service does not.³⁶ In Finland, beneficial ownership information will be publicly available starting from 2019, while the land register can only be accessed by those with





legitimate interest and data are only available in pdf, which does not meet open data standards. As reported by the Finnish Ministry of Finance, the beneficial ownership register will be available as open data through the existing company register.³⁷

The datasets with the highest average score across all three countries are government budget government spending and voting records, all of them provided with comprehensive information at the finest level possible and in machine-readable, open, formats and standards.

On average, all three countries have achieved roughly half of the total score with regard to open standards for comparability and interoperability of datasets. This means that it is harder for stakeholders across the three countries to make cross-comparisons and cross-references among datasets, something that may have negative repercussions on anti-corruption policies at the national and regional level.

None of the three countries has published more than 4 anti-corruption datasets in central open data portals, nor there is evidence of other platforms gathering them. At the time of the writing, Latvia had published four datasets, Finland three and Sweden only one. The low number of datasets in central open data portals makes it

harder for users such as media and anti-corruption organisations to identify and combine anti-corruption datasets for their work. The need for more availability in single-window solutions has also emerged during an international workshop organised in Riga by Transparency International Latvia and partners Open Knowledge Sweden and Open Knowledge Finland in the framework of this project.³⁸

It is possible for users to provide comments on data published for all those datasets included in central open data portals of the three countries. Apart from that, whereas in Finland most of the datasets allow for direct feedback on the location of the data, in Latvia and Sweden in many cases users can only write an email to the responsible for the data instead of posting their comments directly in the location of the data. The lack of digital feedback loops on anti-corruption datasets may have negative effects on the quality of data provided, as it is harder for users to communicate with data providers about their data needs.

Data literacy

Governments in the three countries have promoted initiatives to raise awareness about open data in the public sector and the civil society and foster digital literacy more in general. This process was made easier by the creation of national digital skills coalitions and framework for cooperation as well as by the implementation of cross-sectoral data literacy programmes.

In Sweden, the government has set up a National Digital Skills and Jobs coalition to foster the use of ICT technologies among the population. More in general, there seems to be a large training events industry in the country with good potential for implementing large-scale open data initiatives in the future.³⁹ In Finland, the government has committed to implement cross-sectoral regional trainings on open data.⁴⁰ In Latvia, national open data programmes have included awareness raising activity for public officials and civil society.⁴¹ Governments in the three countries have also partnered with civil society in the organisation of the so-called “Digital Weeks” in the framework of the EU-level “All digital week campaign”, aimed at enhancing digital literacy and popularise the use of the internet across Europe. The initiatives consisted of several events including workshops and public discussions which took place across the countries. Latvia has carried out this initiative since 2010 with consistent participation from the public, while Sweden and Finland only in the last couple of years. Even though such campaigns seem to have been focused mostly on the popularisation of e-services and IT use in general rather than open data, they might represent a good vehicle for future open data literacy initiatives.

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

Governments of all three countries have put in place mechanisms to determine data needs from civil society organisations and the general public, although these seem not to have been involved the use of digital participation platforms with a specific anti-corruption focus. In Sweden, dialogue mechanisms have mostly focused on communication with CSOs working on aid transparency, in the framework of the OGP process. The Latvian and Finnish governments have promoted the use of a number of digital platforms for interacting with citizens and determining data needs of the public at large.

Toolkits

Authorities across the three countries have also issued guidelines and toolkits for public officials respectively on open data and anti-corruption; however, none of these explicitly integrates the two areas. Overall, the possibility to foster anti-corruption awareness through open data tools seems to have been little explored.

Studies and reporting

There is a lack of government-funded studies and thematic reviews in the three countries and at the regional level on the use of open data against corruption. A relevant exception is

represented by the study commissioned by the Finnish Ministry of Finance on the implementation of lobbying registers. This suggests potential further cooperation on this aspect, which would be made easier by existing academic frameworks of cooperation in the region.

Interaction mechanisms and civic engagement

Governments in the three countries have put in place mechanisms of interaction for the use of open data by citizens. The Swedish government, for example, has set up a civil servants' network initiative "Hack for Sweden", whose aim is to popularise the application of open data and foster citizen-driven innovation and cooperation on the issue.⁴² In Latvia, the EU-funded projects PIKTAPS and CITADEL have played a key role in raising awareness about open data and their use.⁴³ Finland's activities to raise awareness on open data included informing the public through themed workshops, fairs and events.⁴⁴

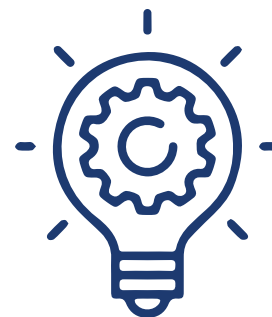
Organised civil society in the three countries has played an important role for the use of open data and has often partnered with governments in organizing important initiatives for the popularization of open data among the public. These include, for example, the organization of important fora of discussion such as the Nordic Open Data Forum in Sweden and the MyData conference in Finland. The 'Open Knowledge

Awards' organized by Open Knowledge Sweden and prizing best initiatives on open data from the public, is a very good example of how to engage the public on the utility of open data.⁴⁵ In Finland, Open Knowledge Finland and has been an important actors in promoting initiatives the application of open data in the fight against corruption in a number of areas, including transparency of government budget and spending and lobbying (see case study, p.27).⁴⁶ In Latvia, networks of NGOs and technology associations have played an important role in fostering civic engagement and pupularising the concept of open data.⁴⁷ For example, Transparency International Latvia (Delna) and Providus have played an important role in fostering civic engagement through the development of digital participation platforms such as ManaBalss.lv and Deputatiuzdelna.lv. Furthermore, the Latvian Open Technology Association (LATA), which unites organizations and individuals among information technology providers and consumers has hosted open data conferences and other initiatives yearly.⁴⁸ 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.⁴⁹



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 a global scale.

Anti-corruption agenda

In general, there seems to be more awareness in Latvia and Finland than Sweden about the potential value of opening up key datasets to tackle corruption and increase public accountability. As commitment to the Open Government Partnership, the Latvian government has released a number of key datasets for anti-corruption policies, including public procurement and political financing register as well as register for the transparency of State Owned Enterprises. The government has also committed to discuss lobbying regulation.⁵⁰ Finland's 2nd OGP action plan included a specific commitment to increase public trust in the government, and has also implemented the government spending platform Tutkihankintoja.fi, along with other initiatives related to the government budget and the study on lobbying register.⁵¹ Anti-corruption does not seem to be high in the open data agenda of the Swedish government, which has given priority to open data for business development and state administration efficiency.⁵² 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.⁵³

Strategic Partnerships and Open Data Tools

Strategic partnerships and initiatives for the creation of tools based on open data have been promoted by governments in the three countries. However, while in Latvia and Sweden the anti-corruption seem not to have been the main driver of these initiatives, in Finland the government has often teamed up with tech-oriented civil society organization for increasing the transparency of government information. For example, the 'Budget Belongs to All' hackathon and the "Hack the Budget" initiative in 2016 were both aimed at increasing the transparency of government resources and resulted in the creation of innovative visualisation tools for government budget and government spending.⁵⁴ In Sweden, the process has been mainly led by the government network Hack for Sweden and networks of tech-oriented CSOs such as Open Knowledge Sweden, which have promoted the creation of innovative solution for improving public services quality and citizens' engagement.⁵⁵ In Latvia, the government has mostly focused on digital tools for the improvement of public services and initiatives for the development of innovative apps in a number of areas such as tourism, culture and regional development.⁵⁶

International Networks

The governments of all three countries have contributed, according to their capacity and expertise, to international organisations and multilateral initiatives for public integrity and data disclosure. The Swedish government, for example, has proactively contributed to the development of the IATI standards and shared its openaid.se portal to help other countries create and improve their own portals.⁵⁷ The Finnish government has shared its experience and expertise in making Public Sector Information available as open data within the European Union and is a contributor to the Extractive Industries Transparency Initiative.⁵⁸ The Latvian government has contributed with personnel to the OGP Anti-Corruption Working Group and the OECD Anti-Corruption working group. Although at the time of the writing there was no evidence of specific initiatives on anti-corruption open data promoted by the Latvian government, the participation in the groups might be a driver for future undertakings in the field.⁵⁹

Case study

Shining a light on lobbying in Finland

Over the past few years, a public struggle took place in Finland regarding information about who influences legislation. Despite Finland's reputation for good governance, lobbying in the country is still essentially unregulated, and little information is available about who is consulted or how much different interest groups spend on lobbying. Large reforms, such as the overhaul of health care, have reportedly been mired by "revolving doors" between those who design the rules in government and the interest groups looking to exploit them.⁶¹ In this context, Open Knowledge Finland (OKFI) played a relevant role in shifting the debate and agenda by managing to make public a part of the information in question.

In 2014, after an initiative to reform copyright law was dropped by the Finnish parliament, a group of activists and journalists associated with the NGO Open Ministry and the broadcaster Svenska Yle filed freedom of information requests to access the parliament's visitor records, to see who had met with the MPs influential in the case. The Parliament refused to release the information, and over two years of debate in courts followed, until in December 2016 the supreme administrative court finally declared the records public.⁶² At this stage, Open Knowledge Finland secured the resources for a wider study of the parliament visitor logs and decided to collect and make the information available as soon as possible. This despite the administration's refusal to release the data electronically (in apparent breach of law) and insistence that people come to their office to view them.

As such, in the summer of 2017, OKFI undertook the venture of turning the entire available archive of paper documents into a useable database. This entailed taking photographs of the documents - data from a complete year, close to 2,000 images - and turn them into electronic format using a number of open source tools to extract the text from the images, place it in structured tables and correct eventual mistakes. This required roughly one month of work, yet it was only the first step, as in most cases the documents only contained dates and names, and little information about people's affiliations, let alone the content of their meetings.

To refine the database, OKFI scraped the Parliament's website and used public sources to find out who were the most frequent visitors and what parties were most frequently connected to particular types of visitors. Eventually, realizing that releasing a dataset alone was not sufficient to make a case for better regulation on lobbying, OKFI chose to partner with investigative journalists, who would be able to present, verify and contextualise the information (find the most relevant facts and narratives from the data) to a broader audience.

Overall the media response was large. According to OKFI's media tracking, at least 50 articles were written in response to the release of the data, essentially stories about how well-resourced actors were best placed to influence legislation.⁶³ For example, YLE, the Finnish public broadcaster, described the privileged access that representatives of nuclear power enjoyed⁶⁴, while the newspaper Aamulehti showed how individual meetings between legislators and the finance industry had managed to shift regulation.⁶⁵ OKFI's own study of the data showed how representatives of private industry were more likely to have access to parties of the governing coalition, while unions and NGOs met more often with opposition parties.⁶⁶

In addition, several national newspapers ran editorials on the need for establishing rules for lobbying.⁶⁷ In response, four political parties, out of the eight represented in parliament, declared that they would start publishing their own meetings with lobbyists. Parliament was forced to concede, and began to release daily snapshots of data about meetings in an electronic format.⁶⁸ These were significant victories, both in practices of transparency as well as changing the policy agenda. According to OKFI, the story demonstrates the value of opening up data as a method of advocacy, but it also teaches something about the importance of time and resources. No newsroom would by themselves have had the time or resources to sustain the several months of labour that working through the data required. This line of working in opening up data may well be desirable, but the obvious challenge is securing the resources to do it.

Recommendations for knowledge transfer and cooperation in the Nordic-Baltic region

Common ‘Open by default’ policies and practices

Governments in the three countries, and in the region at large, might consider implementing initiatives aimed at **fostering mutual understanding of the link between open data and Right to Information and improving current open data policies and practices among state agencies and public officials in the Nordic-Baltic region**. This might entail carrying out exchange programmes or establishing frameworks of cooperation between authorities. In light of the findings of this research, Swedish authorities in particular might benefit from such initiatives

In general, there seems to be a need for **common understanding of the impact that the new EU General Data Protection Regulation on the release of public sector information as open data**. A common innovative approach for the harmonisation of data protection in an open data environment would help stakeholders in the public and private sector, including foreign investors across the region, to better comply with data protection laws in different countries with positive impacts on the efficiency of their activities. Potential initiatives and/or awareness-raising programmes may draw inspiration from the MyData movement developed by the Finnish government.

A Nordic-Baltic strategy for the use of open data in the fight against corruption

Governments in the region might consider working towards a **Nordic-Baltic strategy for the use of open data in the fight against corruption**, identifying critical cross-border issues, (i.e. money laundering, lobbying and transnational organized crime) and explore how implementation of common open data policies might facilitate and improve existing frameworks of cooperation in such areas.

Such strategy might be implemented in practice by encouraging a stronger integration of the agendas of public bodies respectively in charge of open data and anti-corruption policies as well as implementing cooperation programmes including forums, workshops, joint trainings and exchange programmes gathering public officials, CSOs and the private sector. This would help fostering an anti-corruption open data culture in the region and find innovative solutions for the use of open data tools in favour of public integrity.

Towards an advanced and comprehensive regional anti-corruption data infrastructure

For a regional anti-corruption open data strategy to work in practice, it is also necessary that Nordic and Baltic countries work together to establish **mechanisms for the identification of government datasets which are key for regional anti-corruption efforts**, ensuring that they include the same type of information and are provided as open data. This process might be facilitated by the implementation of international open data standards for anti-corruption datasets or, alternatively, the creation of ad-hoc data standards for the Nordic region.

In addition, Nordic and Baltic governments might consider **implementing policies aimed at making central open data portals more user-friendly and allowing for easy identification of key anti-corruption datasets as well as feedback loops between data providers and data users within and between countries**. This not only would make it easier for users to explore and operate with anti-corruption data, but it would also help improving the overall quality of the published data. For this purpose, Nordic-Baltic countries might also consider creating a regional database collecting anti-corruption datasets with strategic relevance for public integrity policies at the regional level.

Shared digital participation platforms for a better assessment of anti-corruption data needs

Nordic and Baltic countries might consider the **implementation of shared digital participation platforms for engaging with civil society anti-corruption organisations, media and the general public on their data needs**. Besides providing an effective communication channel on open data at the regional level, the implementation of such platforms would allow for a better assessment of the demand of open data at the regional level, helping governments in identifying potential areas of cooperation on anti-corruption. Digital participation platforms may also be supplemented with toolkits, guidelines and best practice showcases in order to foster knowledge transfer and common understanding of the benefits of open data in general and in the fight against corruption in particular.

Regional open data literacy initiatives

Nordic-Baltic governments might consider **promoting regional-wide initiatives for open data literacy, with a specific focus on the use of open data for enhancing anti-corruption policies and public accountability mechanisms**. The promotion of such initiatives in Latvia, Sweden and Finland might be facilitated by the existence of national coalitions for digital literacy, through which a major number of key stakeholders may be mobilised more easily. This might entail the organisation of Nordic-Baltic discussion forums on the model of the Nordic Open Data Forum organized in Sweden and similar initiatives such as workshops, communication strategies and open training programmes, which would help popularize the concept of open data as a key tool for cross-border cooperation on anti-corruption and beyond.

Fostering regional academic research on open data for anti-corruption

Nordic and Baltic governments might consider **commissioning regional-wide studies on the use and impact of open data on public accountability and anti-corruption**. This could be facilitated by existing frameworks of cooperation between academic institutions in the region and might bring added-value not only to research on anti-corruption as such (i.e. regional corruption trends and cross-border challenges), but also the quality of existing anti-corruption policies. In addition, in the context of the potential implementation of a regional-wide strategy on anti-corruption open data, Nordic-Baltic governments might consider **implementing reporting mechanisms aimed at showing the impact of open data on public accountability at the regional level**. This might help increasing trust in public institutions.

Strategic regional partnerships for the creation of open data tools for public integrity

The potential of tech-oriented civil society organisations and high level of digital literacy in the Nordic-Baltic region could be leveraged with the **creation of strategic regional partnerships aimed at developing open data tools for public integrity**. This could entail organising regional hackathons, labs and co-creation initiatives according to strategic priorities identified by processes and strategies of regional cooperation on anti-corruption.

The global impact of Nordic-Baltic cooperation on open data

Strategic Nordic-Baltic cooperation on open data for anti-corruption might have a relevant impact at the global level. While Nordic countries are among the most developed and technologically advanced in the world, Baltic countries are fast-growing economies with considerable potential for further development of technologies and tools based on open data. The **promotion of**

regional-wide initiatives on open with a focus on government transparency and public integrity might result in the creation of new international standards and best practices which could be exported to other countries in Europe and beyond. As mentioned in this report, Latvia, Sweden and Finland all participate in and contribute to important international networks for fostering public accountability at the global level, such as the Organisation for Economic Cooperation and Development (OECD), the Open Government Partnership (OGP), the International Aid Transparency Initiative (IATI) and the Extractive Industries Transparency Initiative (EITI). Nordic-Baltic participation and cooperation within such multilateral initiatives would be an effective vehicle for knowledge transfer and promotion of open data in the fight against corruption, consolidating the role of Nordic-Baltic countries as trendsetters for the use of new technologies for improving the quality of governance.



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67. See <https://www.hs.fi/paakirjoitukset/art-2000005409393.html>
68. See <https://www.hs.fi/politiikka/art-2000005406260.html>



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