

Independent Reporting Mechanism

Results Report:
Denmark 2019–2022

Open
Government
Partnership



Independent
Reporting
Mechanism

Executive Summary

Denmark’s fourth Open Government Partnership (OGP) action plan (2019–2022) continued to focus on digitizing the public sector and publishing open data. The action plan resulted in the creation of a portal with data on the climate (Commitment 3) and a whistleblower protection system within the Ministry of Justice (Commitment 7). While all commitments were either fully or substantially completed, their impact on opening government was generally marginal. Denmark’s Multi-Stakeholder Forum (MSF) was not consulted during the implementation of the action plan.

Early Results

Denmark’s fourth action plan focused on digitization and open data. By the end of implementation, all commitments saw early results. The Independent Reporting Mechanism (IRM) noted major early results for Commitment 3, where the Climate Atlas has been actively used in school programs and by municipalities. Commitment 7 on whistleblower protection within the Ministry of Justice, identified as noteworthy in the IRM Design Report, saw marginal early results. The Ministry’s whistleblower system has so far received few inquiries, but it supported Denmark’s implementation of the European Union’s 2019 directive on whistleblower protection.

Completion

All commitments in the fourth action plan were fully or substantially completed. This was an improvement from the third action plan (2017–2019) where nine of 14 commitments were fully or substantially completed.¹ Most of the planned technical platforms proposed by the commitments were created. It is expected that these new platforms will be continuously updated with new data after the action plan period. Implementation was accelerated because of a structured data policy in commitments that involved connecting data from several public agencies. The public sector representatives interviewed for this report seldom knew that their projects were included in the action plan. This was often because the representatives joined their project after the action plan’s adoption or because the projects would have been implemented regardless of their inclusion in the action plan.

Participation and Co-Creation

The MSF met once during the co-creation process. The Agency for Digital Government (AfDG) did not create participation opportunities during the implementation period, but several lead

IMPLEMENTATION AT A GLANCE

LEVEL OF COMPLETION

7/7

Complete or substantially complete commitments

EARLY RESULTS

7/7

Commitments with early results

1/7

Commitments with major or outstanding early results

COMPLIANCE WITH MINIMUM REQUIREMENTS

Not acting according to OGP process.

agencies collaborated with civil society, citizens, and other public agencies. AfDG did not maintain an online repository during the action plan’s implementation, nor did it publish a self-assessment report. However, as mentioned above, the lack of participation during the implementation did not negatively affect the completion of commitments.

Implementation in Context

The implementation period for the fourth action plan was initially planned for 2019–2021 but was extended to August 2022 because of the COVID-19 pandemic. Some commitments were delayed because of the run up to the national election in October 2022. While the election campaign and government negotiations to form a new government took place, no ministry or public department could sign contracts.² This affected both the rule of law unit within the Danish Appeals Agency (Commitment 6) that waited for a decision on whether the project would receive financial resources to continue and the development of the “My Overview” platform (Commitment 5). The election also affected the OGP Secretariat, as AfDG was moved to a new ministry in December 2022. This created some organizational challenges but has not prevented the continuation of OGP work in Denmark in 2023.

¹ Mikkel Otto Hansen, *Independent Reporting Mechanism (IRM): Denmark’s Implementation Report 2017–2019* (Open Government Partnership, June 1, 2020), <https://www.opengovpartnership.org/documents/denmark-implementation-report-2017-2019/>.

² Sine Riis Lund, “Hvad må embedsmænd lave under en valgkamp?” (in Danish), *Altinget*, October 9, 2022, <https://www.alinget.dk/artikel/hvad-maa-embedsmaend-lave-under-en-valgkamp>.

Table of Contents

Section I: Key Observations	1
Section II: Implementation and Early Results	4
Section III. Participation and Co-Creation	8
Section IV. Methodology and IRM Indicators	10
Annex I. Commitment Data.....	12

Section I: Key Observations

Denmark's fourth action plan continued to focus on fostering public trust and transparency through digitization and open data. Most commitments saw high levels of completion, even though lead implementing agencies were mostly unfamiliar with the OGP process. Implementation took place outside the Open Government Partnership (OGP) framework, including consultations with end users during the development of new digital platforms.

Observation 1: The action plan focused on the digitization of the public sector but did not reflect the priorities of civil society.

The action plan's focus on the digitization of the public sector largely reflected the placement of OGP within the Agency for Digital Government (AfDG; known before May 2022 as the Agency for Digitization).³ While the commitments addressed important societal issues, such as climate change and workplace safety, they did not reflect the policy priorities of civil society. For example, a representative of Transparency International (TI) Denmark noted that the action plan could have included commitments to improve how incoming inquires ought to be handled (e.g., from journalists) to comply with the Access to Public Administration Files Act ("Offentlighedsloven").⁴ According to the TI representative, the processing times for information requests in Denmark take longer than in Norway and Sweden.

The focus on digitization in the public sector has disincentivized civil society from actively participating in Denmark's OGP process in the past.⁵ The civil society organization "Danish Board of Technology" (Teknologirådet) argued that AfDG prioritized ongoing or recently started projects in past action plans before inviting civil society and citizens to propose new initiatives.⁶

Observation 2: Major anti-corruption and transparency reforms in Denmark remained outside the OGP framework.

Denmark continues to perform well in OGP's eligibility criteria and in international anti-corruption rankings. However, important open government reforms continue to fall outside the OGP framework, such as the management of the General Data Protection Regulation (GDPR), transparency of foreign aid, the strengthening of beneficial ownership transparency, and amendment of laws on financial support to political parties.⁷ Many of these initiatives remained relevant to Denmark's open government context during the implementation of the action plan.

Despite the focus on digitization, the fourth action plan also demonstrated the possibility of introducing higher-priority reforms by including a commitment on whistleblowing schemes within the Ministry of Justice (Commitment 7). For future action plans, AfDG could consider commitments that address open government reforms in addition to digitization and open data, such as lobbying transparency and political party financing transparency. The inclusion of higher-priority reforms could increase civil society's interest in participating in Denmark's OGP process going forward.

Observation 3: Implementing agencies were mostly unaware that their projects were included in the OGP action plan.

The public sector representatives interviewed for this report were mostly unfamiliar with OGP and seldom knew that their projects were included in the action plan. This was often because the representatives joined their project after the action plan's adoption or because the projects

would have been implemented regardless of their inclusion in the action plan. OGP does not have a separate budget in the government, so the commitments came from existing financial decisions.⁸ For example, the Climate Atlas (Commitment 3) came from the Finance Act 2018 that equips municipalities with reliable information about future extreme weather,⁹ whereas “My Overview” (Commitment 5) came from a 2019 agreement on digitization between Local Government Denmark (KL), the Association of Danish Regions, and the central government.¹⁰ Many commitments had consultations with citizens and civil society already integrated into their work. Therefore, the lack of awareness of OGP did not significantly impact the completion of the commitments or the levels of public and civil society engagement in their implementation.

Observation 4: New digital platforms saw stronger results when end users were consulted during their implementation.

The commitments that had the strongest results also had close cooperation across sectors, agencies, and end users. This cooperation improved the platform designs and connected data sources across agencies. User tests and expert panels engaged civil society or external stakeholders. For example:

- Commitment 1 utilized an expert panel to assess the user-friendliness of the platform “Digidata.”
- Commitment 2 involved a hackathon for professionals to gain input on machine learning models to develop the database on workplace safety.
- Commitment 3 involved close collaboration with KL to understand municipalities’ priorities for data application on the Climate Atlas. Municipalities are also part of several climate adaption networks for dialogue with think tanks, professionals, and other stakeholders.
- Commitment 5 required close collaboration between public agencies to contribute data to the “My Overview” platform and to conduct user tests and surveys after the platform went live.

Several interviewed representatives from responsible agencies reported that it is difficult to make Denmark’s data structure easily accessible to the public because its data sources are hosted or owned by a range of different agencies. However, cross-sector collaboration with data owners and user tests helped create easily accessible platforms that contain data from different public agencies. This was evidenced through Commitments 3, 4, and 5 (Climate Atlas, “Hydrological Information and Forecasting System,” and “My Overview,” respectively). The commitment leads often received positive feedback from international colleagues interested in learning from Danish methods.¹¹ An accelerator for cross-sector collaborations was a structured data policy in commitments that connected data from several agencies (such as Commitment 1 from the National Archives and Commitment 5 from AfdG).

Observation 5: Delays in implementation occurred when IT resources were insufficient.

Software development resources are in high demand in Denmark’s public sector. The most common barrier across commitments was insufficient IT resources in the implementing agency. Climate Atlas lacked geographic information system developers, the National Archives were delayed due to the COVID-19 pandemic, and the redistribution of IT resources within departments or agencies affected several initiatives. The redistribution issue is representative of the tendency for digitalization in the public sector to happen both within and outside the OGP

framework. These delays only impacted implementation to a small degree. With the one-year extension of the action plan, all commitments saw at least substantial completion.

³ AfDG changed their name and relaunched their English website in May 2022 to reflect their work of improving Denmark's public digital infrastructure and services. The Danish Agency for Digital Government (Digitaliseringsstyrelsen), "Digitaliseringsstyrelsen får nyt navn på engelsk samt ny engelsk hjemmeside", 18 May 2022, <https://digst.dk/nyheder/nyhedsarkiv/2022/maj/digitaliseringsstyrelsen-faar-nyt-navn-paa-engelsk-samt-ny-engelsk-hjemmeside/>

⁴ Interview with Transparency International Denmark, March 24, 2023.

⁵ Mikkel Otto Hansen, *Independent Reporting Mechanism (IRM): Denmark's Design Report 2019–2021* (Open Government Partnership, December 4, 2020, p. 10), https://www.opengovpartnership.org/wp-content/uploads/2020/12/Denmark_Design_Report_2019-2021_EN.pdf.

⁶ Interview with Teknologirådet, March 9, 2023. Note: Until December 2022 AfDG belonged to the Ministry of Finance, but now they belong to the newly developed Ministry of Digital Government and Gender Equality.

⁷ Hansen, *Independent Reporting Mechanism (IRM): Denmark's Design Report 2019–2021*, p. 6.

⁸ Hansen, *Independent Reporting Mechanism (IRM): Denmark's Design Report 2019–2021*.

⁹ "Ofte stillede spørgsmål," Danish Meteorological Institute website, accessed March 17, 2023, <https://www.dmi.dk/klima-atlas/oftestilledepoergsmaal/>.

¹⁰ Digitaliseringsstyrelsen, "Evaluering af Mit Overblik – Etape 1," August 2021, <https://digst.dk/media/24735/evalueringsrapport-af-mit-overblik-etape-1.pdf>

¹¹ Interview with the Agency for Data Supply and Infrastructure (SDFI), February 21, 2023.

Section II: Implementation and Early Results

The following section looks at the two commitments or clusters that IRM identified as having the strongest results from implementation. To assess early results, the IRM referred to commitments or clusters identified as promising in the Design Report as a starting point. After verifying the evidence of completion, IRM also took into account commitments or clusters that had not been determined as promising but that, as implemented, yielded significant results.¹²

Commitment 3: Climate Atlas, The Danish Meteorological Institute

Context and Objectives:

Under this commitment, the Danish Meteorological Institute (DMI) aimed to present all climate data in a single public database called the “Climate Atlas.” This commitment called for the expansion of the climate indicators and variables available on the Climate Atlas in two phases. The first phase would introduce new indicators on wind, evaporation, and solar radiation as well as 100-year events and worst-case flooding events. The second phase would provide users with the option to work with time series of data. The commitment also called for an improvement in the quality of data available through the Climate Atlas, providing users with more detailed analysis (e.g., time progressions) of climate change.

Did It Open Government? Major

DMI launched the Climate Atlas in October 2019.¹³ It presents basic and advanced climate variables, time progressions, high-resolution data model, and education materials for high schools. The Climate Atlas collects the data in one database, makes calculations and models, and presents data in a user-friendly way. The data come from DMI’s own registers, international corporations, and the UN Climate Panel’s reports.¹⁴ DMI’s largest barrier was (and still is) the technical competencies regarding the publication of geographic information system data that they do not have in house but have acquired from an external consultancy.¹⁵ The use of external consultants reduced flexibility but did not slow implementation.

According to Local Government Denmark (KL), Climate Atlas’ data provide important insights for municipalities, regions, and the state on climate adaption.¹⁶ KL and the individual municipalities organized workshops in all municipalities to understand what information citizens need. The input was then distributed to DMI via workshops with KL. The input from citizens and municipal governments helped DMI develop the user interface and decide what data and models were needed to support climate adaption of all 98 Danish municipalities.¹⁷ DMI also cooperated with CONCITO, an environmental think tank responsible for the climate adaption network DK2020.¹⁸ The data in the Climate Atlas have contributed to at least 10 scientific publications.¹⁹ The main target users for the Climate Atlas are municipalities, researchers, and other professionals, but many citizens also use the data.²⁰ Citizens and nongovernmental organizations approach DMI when they hear about the Climate Atlas in the media and UN climate reports.²¹ DMI uses these opportunities to promote the Climate Atlas.²² For example, citizens on the island of Funen have used the Climate Atlas to hold their municipalities accountable for creating climate plans regarding coastal protection.²³

The data are also actively used in the National Bank’s assessments of future financial stability and in high school learning materials. The National Bank uses Climate Atlas data to analyze the

financial risks associated with floods and rising water levels and the risks for credit institutions with real estate mortgages.²⁴ DMI cooperated with the Novo Nordisk LIFE Foundation to develop educational materials for high school students. DMI participated in the “VANDKAMP” event, where high school students investigated future climate patterns of their local communities using data and models in the Climate Atlas.²⁵ The students used the Climate Atlas to support their fieldwork on the seepage potential around the high school and to conduct a qualitative risk assessment on floods in the students’ local communities. According to the LIFE Foundation, the use of the Climate Atlas experiments has improved the students’ understanding of the climate-related issues in their local communities.²⁶

While the data were available through other sources before the action plan, the Climate Atlas has made accessing the data significantly more user friendly, and DMI has developed new models with the data. In addition, uptake of the data on climate adaption has been high among municipalities, researchers, and citizens (particularly students and teachers learning about climate risks and policies). Therefore, IRM assesses this commitment as having a major impact on open government in Denmark.

Looking Ahead:

Students and teachers use the Climate Atlas in their classes, and citizens have used it to hold their municipality accountable for creating climate plans regarding coastal protection.²⁷ The LIFE Foundation, which prepares teaching material for high school students, appreciates their collaboration with DMI on the Climate Atlas. Specifically, they highlight how students can work with the same data and models as professional scientists, which helps students better understand the relevance of their work.²⁸ In the medium to long term, DMI expects to publish a user platform on the Climate Atlas, directly addressing citizens’ needs and popular themes like weather effects on gardening.²⁹

Commitment 7: Whistleblower schemes within the Ministry of Justice, Ministry of Justice

Context and Objectives:

This commitment aimed to introduce whistleblower protection within the Ministry of Justice. Its objectives included protecting employees against negative consequences when raising legitimate concerns of mismanagement within the targeted authorities through anonymized reporting channels. The whistleblower protection system would apply only to employees of the Ministry of Justice.

Did It Open Government? Marginal

The Ministry of Justice created the whistleblower system on March 1, 2019, for the police, the Danish Security and Intelligence Service, the Prosecution Service, and the Correctional Service.³⁰ The ministry developed instructions for use, and all departments and agencies discussed system-related issues with each other. This knowledge-sharing accelerated implementation.³¹ There was media attention when the whistleblower scheme was launched, with the ministry occasionally receiving inquiries from TV and radio.³²

The whistleblower system is an online form where a person can submit information about objectionable conduct if they are employed in one of the departments of the Ministry of Justice or if they are a business partner of a department.³³ The system does not log or save personal

information about the person making the inquiry. If the whistleblower wishes anonymity, it is their own responsibility not to report names. The whistleblower must also be attentive to the potential metadata affiliated with external documents they may choose to attach to the inquiry. The Ministry published a guide to making inquiries on their website.³⁴

The Ministry created the system as part of the EU's directive from October 2019 on whistleblower protection.³⁵ To transpose the directive into national legislation, the Danish Parliament adopted the Whistleblower Act on June 24, 2021. The Whistleblower Act of 2021 makes it mandatory for all public and private workplaces with more than 50 employees to establish a whistleblower scheme. The Whistleblower Act protects people who report breaches of EU law and Danish law.³⁶ To comply with the Whistleblower Act, the Ministry of Justice began publishing annual statistics on whistleblowing in 2021.³⁷

The ministry's system has so far received few whistleblower reports (four in 2021 and two in 2022), none of which were reported to the police. The reports were either not sent by people in the target group or did not deal with conditions related to a department of the Ministry of Justice.³⁸ According to the ministry, the number of reports is low because cases of misconduct are rare,³⁹ though Transparency International (TI) Denmark believes that a functional whistleblower system typically receives around 1.3 reports per 100 employees.⁴⁰ The ministry sends annual emails to employees on how to use the system. TI Denmark recommends presenting employees with successful cases of employee reporting to encourage the use of the system as needed.⁴¹

The whistleblower scheme has opened the possibility for employees of the Ministry of Justice to report serious offenses of the law. Before this commitment, there was no formal way for employees in the Ministry to report misconduct. Whistleblower protection was mandatory in certain sectors (e.g., the financial sector) but not across public and private companies. The introduction of the whistleblower scheme in the departments of the Ministry of Justice was a response to previous cases of misconduct in law enforcement agencies. Since the commitment only covered people employed or hired by the Ministry of Justice, IRM assesses its impact on government openness as marginal. However, the Ministry of Justice has provided guidance to other government agencies in implementing their own whistleblower systems to comply with the Whistleblower Act.⁴²

Looking Ahead:

The next step for the Ministry of Justice will be to continue handling incoming inquiries. All whistleblower systems in Denmark are required to have their own administration. The Ministry of Justice and TI note that the bigger coverage a scheme has, the more inquiries are reported, and the better cases are handled by the respective administration. However, the EU directive that guided the Whistleblower Act has limited the possibility of cross-organizational administration of whistleblower schemes.⁴³

¹² The IRM did not select Commitment 2 (open data on workplace health and safety) for this section even though it was highlighted as noteworthy in the IRM 2019–2021 Design Report. This is because there are no examples of the public using the Working Environment Authority's database on workplace safety, despite its value to workers and labor unions. For more information on the implementation of Commitment 2, see Annex 1 of this report.

¹³ "Klimaatlas," Danish Meteorological Institute (DMI) website, accessed March 17, 2023, <https://www.dmi.dk/klimaatlas/>.

- ¹⁴ “Om Klimaatlas,” DMI website, accessed March 17, 2023, <https://www.dmi.dk/klima-atlas/om-klimaatlas/>.
- ¹⁵ Interview with the Danish Meteorological Institute, February 15, 2023.
- ¹⁶ “Klimaatlas: Klar til fremtidens vejr,” Via Ritzau website, October 6, 2019, <https://via.ritzau.dk/pressemeddelelse/klimaatlas-klar-til-fremtidens-vejr?publisherId=13559149&releasId=13580883>.
- ¹⁷ “Det gode samarbejde: DMI og GEO,” LIFE Fonden website, accessed June 5, 2023, <https://life.dk/nyheder/vandkamp-det-gode-samarbejde-dmi-og-geo>.
- ¹⁸ “Tre Temanotater om Klimaforandringer,” KL website, accessed March 17, 2023, <https://www.kl.dk/kommunale-opgaver/teknik-og-miljoe/vand-og-natur/klimatilpasning/tre-temanotater-om-klimaforandringer/>.
- ¹⁹ “Dokumentation og publikationer,” DMI website, accessed March 17, 2023, <https://www.dmi.dk/klima-atlas/dokumentation-og-publikationer/>.
- ²⁰ Interview, Danish Meteorological Institute.
- ²¹ “Nu skal FN’s Klimapanel sætte sidste punktum i stor klimarapport,” DMI website, accessed March 17, 2023, <https://www.dmi.dk/nyheder/2023/nu-skal-fns-klimapanel-satte-sidste-punktum-i-stor-klimarapport/>.
- ²² Interview, Danish Meteorological Institute.
- ²³ “Hele udsendelsen,” TV2 Fyn, Local News, October 29, 2022, video, 19:30, <https://www.tv2fyn.dk/nyheder/29-10-2022/1930/1930-29-10-2022>.
- ²⁴ “Sådan anvendes Klimaatlas,” DMI website, accessed March 17, 2023, <https://www.dmi.dk/klima-atlas/sadan-anvendes-klimaatlas/>; “Undervisningsmateriale,” DMI website, accessed March 17, 2023, <https://www.dmi.dk/klima-atlas/klimaatlas-undervisningsmateriale/>.
- ²⁵ “Vandkamp,” LIFE Fonden website, accessed March 17, 2023, <https://life.dk/undervisningsforlob/vandkamp>.
- ²⁶ Interview with LIFE Fonden, March 6, 2023.
- ²⁷ “Hele udsendelsen,” TV2 Fyn.
- ²⁸ “Det gode samarbejde: DMI og GEO,” LIFE Fonden website.
- ²⁹ DMI, interview.
- ³⁰ Ministry of Justice department, whistleblower scheme, accessed 17 March 2023, <https://jm-dep.sit-wb.dk/#/>
- ³¹ Interview with the Ministry of Justice, February 22, 2023.
- ³² Ministry of Justice, interview.
- ³³ Whistleblower platform for the Ministry of Justice, accessed 17 April 2023, <https://jm-dep.sit-wb.dk/#/>
- ³⁴ “Departementets whistleblowerordningen,” Justitsministeriet website, accessed April 17, 2023, <https://www.justitsministeriet.dk/ministeriet/whistleblowerordning/departementet/>.
- ³⁵ “A Vital Chance for Whistleblower Protection,” *Transparency International*, June 22, 2020, <https://www.transparency.org/en/blog/a-vital-chance-for-whistleblower-protection>.
- ³⁶ *Vejledning om whistleblowerordninger på offentlige arbejdspladser* (Justits Ministeriet, December 17, 2021), <https://www.justitsministeriet.dk/wp-content/uploads/2021/12/Vejledning-for-whistleblowerordninger-paa-offentlige-arbejdspladser.pdf>.
- ³⁷ “Statistik vedrørende whistleblowerordningen i Justitsministeriets departement,” Justitsministeriet website, accessed March 17, 2023, <https://www.justitsministeriet.dk/ministeriet/whistleblowerordning/statistik-vedroerende-whistleblowerordningen-i-justitsministeriets-departement/>.
- ³⁸ “Statistik vedrørende whistleblowerordningen,” Justitsministeriet website; “Whistleblowers,” Transparency International website, accessed March 17, 2023, <https://transparency.dk/whistleblowers-2/>.
- ³⁹ “Statistik vedrørende whistleblowerordningen,” Justitsministeriet website.
- ⁴⁰ Interview with Transparency International Denmark, March 24, 2023.
- ⁴¹ Transparency International Denmark, interview.
- ⁴² Ministry of Justice, interview. The administrative unit that developed the Ministry of Justice’s system used a digital solution from Italy (GloLeaks) to handle incoming inquiries.
- ⁴³ Transparency International Denmark, interview; Ministry of Justice, interview.

Section III. Participation and Co-Creation

Denmark’s Multi-Stakeholder Forum (MSF) met once during the co-creation process of the fourth action plan. The Agency for Digital Government (AfDG) did not create participation opportunities during the implementation period, but many lead agencies actively collaborated with civil society, citizens, and other public agencies.

The AfDG (known as the Agency for Digitization until May 2022) oversees the Open Government Partnership (OGP) in Denmark. AfDG is under the Ministry of Digital Government and Gender Equality, which was created by the new government in December 2022.⁴⁴ Previously, AfDG was under the Ministry of Finance. The new ministry combines digitalization from the public sector and the business community and will give Denmark its first dedicated Minister for Digital Government and Gender Equality. However, the Danish ICT Industry Association is concerned that because the Minister for Digital Government and Gender Equality is not a part of any central government committees, they may have difficulty securing funding for large-scale digital initiatives.⁴⁵ How this will affect future action plans is unknown.

During the co-creation process, AfDG invited civil society to provide proposals that address the policy areas that AfDG had already identified.⁴⁶ While the process was open to anyone, few nongovernmental stakeholders participated.⁴⁷ AfDG did not consult civil society during the implementation period. Civil society was engaged in some commitments on an ad hoc basis (e.g., the LIFE Foundation and the Climate Atlas), but no commitment leads consulted Denmark’s OGP MSF. A representative of Transparency International (TI) Denmark noted that because OGP action plans typically focus on the existing digitization work of AfDG, TI has little incentive to participate in the OGP process.⁴⁸ A TI representative believes that AfDG is the right place to oversee the OGP process (especially in improving how the Access to Public Administration Files Act is handled), but high-level political involvement in the OGP process is needed to improve the ambition of action plans.

AfDG’s current point of contact (POC) to OGP took over the role at the end of the action plan, and knowledge sharing between the former and current POCs was minimal.⁴⁹ AfDG has not published a self-assessment report for the fourth action plan. During the third action plan (2017–2019), AfDG created a platform to share OGP-related news, updates, and events.⁵⁰ This platform was inactive during the implementation of the fourth action plan. The current POC is aware of the lack of reporting or consultations with stakeholders during implementation and plans to prepare annual OGP activities for the MSF going forward.⁵¹

Compliance with the Minimum Requirements

The IRM assesses whether member countries met the minimum requirements under OGP’s Participation and Co-Creation Standards for the purposes of procedural review. According to the Denmark Design Report, Denmark acted according to OGP process during co-creation of the action plan.⁵² During implementation, countries are required to maintain an OGP repository and provide the public with information on implementation of the action plan. The repository must be online, updated at least once during the action plan cycle, and contain evidence of development and implementation of the action plan. Based on these requirements, Denmark **did not** act according to OGP process during the implementation period.⁵³

Key:

Green = Meets standard

Yellow = In progress (steps have been taken to meet this standard, but standard is not met)

Red = No evidence of action

Acted according to OGP process during the implementation period?	
<p>The government maintained an OGP repository that is online, updated at least once during the action plan cycle, and contains evidence of development and implementation of the action plan. During the previous action plan, AfdG created an online platform for publishing documents regarding OGP.⁵⁴ AfdG did not update this platform with information or evidence of the implementation during the fourth action plan. The only uploads during this period were a notice on the extension of the action plan by one year (August 2020) and a notice on the publication of IRM’s 2019–2021 Design Report (December 2020).⁵⁵</p>	Red
<p>The government provided the public with information on the action plan during the implementation period. AfdG did not provide any updates to stakeholders on the progress of the commitments in the fourth action plan after the co-creation process—neither through consultations with the MSF nor through the online repository.</p>	Red

⁴⁴ Mathilde Brieghel, Emma Brink, and Cindy Shummontien Green, “Overblik: Her kan du lære de nye ministre at kende,” *Altinget*, December 15, 2022, <https://www.altinget.dk/artikel/overblik-her-kan-du-laere-de-nye-ministre-at-kende>.

⁴⁵ Natasha Friis Saxberg, “Digitalisering parkeres i nyt ministerium,” *IT Branchen*, December 15, 2022, <https://itb.dk/nyheder/digitalisering-parkeres-i-nyt-ministerium/>.

⁴⁶ “OGP netværksmøder,” Digitaliseringsstyrelsen website, accessed March 17, 2023, <https://digst.dk/strategier/internationalt-samarbejde/open-government/ogp-netvaerksmoeder/>.

⁴⁷ Mikkel Otto Hansen, *Independent Reporting Mechanism (IRM): Denmark’s Design Report 2019–2021* (Open Government Partnership, December 4, 2020), https://www.opengovpartnership.org/wp-content/uploads/2020/12/Denmark_Design_Report_2019-2021_EN.pdf. The only participating CSO, Open Knowledge Denmark is no longer an active organization, cf. message with spokesperson.

⁴⁸ Interview with Transparency International Denmark, March 24, 2023.

⁴⁹ Interview with Danish Agency for Digital Government representative, February 15, 2023.

⁵⁰ Agency of Digital Government, “Open Government Partnership - udarbejdelse af handlingsplan for 2017-2019”, accessed March 17, 2023, <https://digst.dk/strategier/internationalt-samarbejde/open-government/nyt-om-ogp/>.

⁵¹ Danish Agency for Digital Government, interview.

⁵² Hansen, *Independent Reporting Mechanism (IRM): Denmark’s Design Report 2019–2021*.

⁵³ Future IRM assessment will focus on compliance with the updated OGP Co-Creation and Participation Standards that came into effect on 1 January 2022: <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.

⁵⁴ “Open government,” Digitaliseringsstyrelsen website, accessed June 5, 2023, <https://digst.dk/strategier/internationalt-samarbejde/open-government/>.

⁵⁵ “Nyt om OGP,” Digitaliseringsstyrelsen website, accessed June 5, 2023, <https://digst.dk/strategier/internationalt-samarbejde/open-government/nyt-om-ogp/>.

Section IV. Methodology and IRM Indicators

This report supports members' accountability and learning through assessment of (i) the level of completion for commitments' implementation, (ii) early results for commitments with a high level of completion identified as promising or that yielded significant results through implementation, and (iii) participation and co-creation practices throughout the action plan cycle. The IRM commenced the research process in January 2023 with the development of a research plan, preliminary desk research, and verification of evidence provided in the country's OGP webpage.⁵⁶

In 2022, OGP launched a consultation process to co-create a new strategy for 2023–2028.⁵⁷ The IRM will revisit its products, process, and indicators once the strategy co-creation is complete. Until then, Results Reports continue to assess the same indicators as previous IRM reports:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.⁵⁸ The level of completion for all commitments is assessed as one of the following:

- *No evidence available*
- *Not started*
- *Limited*
- *Substantial*
- *Complete*

Did It Open Government?

The IRM assesses changes to government practices that are relevant to OGP values, as defined in the OGP Articles of Governance, under the "Did it open government?" indicator.⁵⁹ To assess evidence of early results, the IRM refers to commitments or clusters identified as promising in the Action Plan Review as a starting point. The IRM also takes into account commitments or clusters with a high level of completion that may not have been determined as "promising" but that, as implemented, yielded significant results. For commitments that are clustered, the assessment of "Did it open government?" is conducted at the cluster level, rather than the individual commitment level. Commitments or clusters without sufficient evidence of early results at the time of assessment are designated as "no early results to report yet." For commitments or clusters with evidence of early results, the IRM assesses "Did it open government?" as one of the following:

- *Marginal*: Some change, but minor in terms of its effect on level of openness
- *Major*: A step forward for government openness in the relevant policy area but remains limited in scope or scale
- *Outstanding*: A reform that has transformed "business as usual" in the relevant policy area by opening government

This report was prepared by the IRM in collaboration with Cecilia Linn Hansen, partner at Nordic Consulting Group, and was reviewed by German Emanuele, IRM external expert. The IRM

methodology, quality of IRM products and review process is overseen by the IRM’s International Experts Panel (IEP). The current IEP membership includes:

- Snjezana Bokulic
- Cesar Cruz-Rubio
- Mary Francoli
- Maha Jweid
- Rocio Moreno Lopez

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual⁶⁰ and in Denmark’s 2019–2021 Design Report. For more information, refer to the “IRM Overview” section of the OGP website.⁶¹ A glossary on IRM and OGP terms is available on the OGP website.⁶² For this report, all interviews were conducted in confidentiality, and the names of interviewees are withheld by mutual agreement.

⁵⁶ Denmark, OGP Repository. Date accessed: March 15, 2023: <https://www.opengovpartnership.org/members/denmark/>.

⁵⁷ “Creating OGP’s Future Together: Strategic Planning 2023–2028,” Open Government Partnership website, accessed June 5, 2023, <https://www.opengovpartnership.org/creating-ogps-future-together/>.

⁵⁸ The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “potential for results” and “Did it open government?” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology and IRM Indicators of the Action Plan Review.

⁵⁹ Open Government Partnership, *Open Government Partnership Articles of Governance*, June 17, 2019, https://www.opengovpartnership.org/wp-content/uploads/2019/06/OGP_Articles-of-Governance_2019.pdf.

⁶⁰ *IRM Procedures Manual, V.3* (Independent Reporting Mechanism, September 16, 2017), <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

⁶¹ “IRM Overview,” Open Government Partnership website, accessed June 5, 2023, <https://www.opengovpartnership.org/irm-guidance-overview/>.

⁶² “Glossary,” Open Government Partnership website, accessed June 5, 2023, <https://www.opengovpartnership.org/glossary/>.

Annex I. Commitment Data⁶³

Commitment 1: The Danish National Archives provides open data to private individuals and professionals

- | | |
|---|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Minor | <ul style="list-style-type: none"> • Completion: Substantial • Did it open government? Marginal |
|---|---|

Under this commitment, the National Archives aimed to improve access to historical data held by the public sector. This commitment saw substantial completion. Milestone 1 called for improving the presentation of metadata. The National Archives launched “Digidata” in June 2022.⁶⁴ Digidata is a search engine on publicly available data and metadata from the last 60 years.⁶⁵ Milestone 2 called for improving the overview of data. By the end of the action plan, the digital overview on Digidata includes all government IT systems that currently publish data, but the original goal was to also include the data from systems that publish only in paper form or were previously unavailable. These datasets are available upon request, but not all are presented openly in Digidata since the National Archives could not confirm the quality of all data. Milestone 3 called for free and easily available data. The National Archives published all available data, including metadata. The download function is limited to datasets that do not contain personal information, but data with personal information can be requested.

Although much data are protected by personal data regulations, citizens now know what data are available from certain public authorities. Citizens have used Digidata to find out who to contact about their employment history when applying for an early retirement pension.⁶⁶ However, the impact on government openness is so far marginal, as citizens do not yet actively use Digidata nor is it actively used in new data models or other National Archives research projects.

Commitment 2: Open data on workplace health and safety

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Moderate | <ul style="list-style-type: none"> • Completion: Complete • Did it open government? Marginal |
|--|--|

Under this commitment, the Working Environment Authority aimed to create a central database on work-related risks in the private and public sectors. The Working Environment Authority developed the database (including an API) and completed a user analysis of the data.⁶⁷ The data shows statistics on work environment risks (e.g., accidents, work-related injuries, or the use of chemical products) disaggregated by categories such as sector, severity, and gender.⁶⁸ However, not all categories of data envisaged in the commitment (i.e., complaints, company

statistics, and work-related illness) could not be published because they contain personal information.

During implementation, the Working Environment Authority participated in a hackathon hosted by the Danish Business Authority. This hackathon inspired the Working Environment Authority to pursue more dialogue with target groups to develop the statistics for its database.⁶⁹ Although the personal nature of the data limited the possibilities for public engagement, the Working Environment Authority engages in fora on exchanging data with other public agencies.

The Working Environment Authority expects to develop more calculations and machine learning models based on their data.⁷⁰ While the database has value to workers and labor unions, there are no examples of the public using it so far. Therefore, IRM considers its impact on open government marginal.

Commitment 3: Climate Atlas

- | | |
|---|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Minor | <ul style="list-style-type: none"> • Completion: Complete • Did it open government? Major |
|---|---|

This commitment is assessed in Section II.

Commitment 4: Joint public collaboration on terrain, climate, and water data

- | | |
|---|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Minor | <ul style="list-style-type: none"> • Completion: Complete • Did it open government? Marginal |
|---|--|

Data on terrain, climate, and water in Denmark were compiled and owned by a number of public authorities. Under this commitment, the Agency for Data Supply and Infrastructure (SDFI) developed a Hydrological Information and Forecasting System (HIF)⁷¹ that collected and published this data in one place.

This commitment was completed. The HIF exhibits hydrological data, calculations, and forecasts on climate adaptation as well as data on water management.⁷² The data are owned and hosted by many public agencies, so the SDFI does not have a full overview of all data. For example, the Point Discharge System database by the Danish Environmental Portal is only available to public institutions.⁷³ Thus, while the SDFI completed the platform, not all available data are open source (i.e., pollution and municipalities’ sensitive data).

The SDFI hosted user workshops with Local Government Denmark (KL), the Association of Danish Regions, the Ministry of Environment, and other public agencies.⁷⁴ The SDFI also

maintained dialogue with the finance sector to deliver data for investments in property and climate adaptations. Researchers and private sector professionals have started using the data in their work. For example, the company SCALGO (<https://scalgo.com/>) uses the HIF for climate adaptation and city planning, and the company BOLIGA uses it to educate property owners and buyers on climate risks through the platform DinGeo (<https://www.dingeo.dk/#>). As a part of the HIF project, the SDFI also developed climate adaptation tool KAMP that the public can use to investigate ground water levels in their local area.⁷⁵ Moreover, users can use a forum that is available on the webpage to ask questions and propose improvements to the HIF.⁷⁶

This commitment saw marginal but positive improvements to the openness of environmental data. Danish municipalities (the target users of the platform) know about the HIF and KAMP, but they do not yet actively use these tools in their work.⁷⁷ Municipalities can use the data when engaging their citizens, such as during the acquisition of properties to account for rising water levels.⁷⁸ The information on which municipalities base their proposals is now easily accessible in one place. Citizens can also use the data to demand that their local governments act to address rising water levels and climate adaptation. Moreover, the Danish Environment Protection Agency is publishing frequently asked questions about climate adaptation and responsibility.⁷⁹

Commitment 5: “My Overview”

- | | |
|---|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Minor | <ul style="list-style-type: none"> • Completion: Substantial • Did it open government? Marginal |
|---|---|

Under this commitment, the Agency for Digital Government (AfdG) aimed to create a platform on borger.dk where citizens can access an overview of their personal data administered by public institutions, called “Mit Overblik” (“My Overview”).⁸⁰ AfdG created the platform, but not all data from municipalities and public institutions could be included simultaneously.⁸¹ AfdG expects more municipalities to deliver data as the project proceeds.

AfdG and public agencies conducted user tests, requested feedback on data models, and developed common formats to ensure a smooth transition of data to My Overview. AfdG reached out to the Network for Digital Inclusion, which includes civil society organizations that represent the elderly, ethnic minorities, and digitally challenged groups.⁸² AfdG also carried out annual evaluations and surveys on the use of My Overview.⁸³ The national elections in 2019 and 2022 slowed implementation, as did the government’s decision to halt the use of private consultants in the public sector.⁸⁴ The commitment was initially planned to end in 2023, but AfdG now expects to finish it in 2024 and to continuously add data to the platform.⁸⁵

My Overview has not led to direct changes in government practice, but it ensures compliance with the regulations of data protection.⁸⁶ AfdG expects the platform to improve government communication at the municipal level because citizens will have better information before engaging with civil servants.⁸⁷ For example, citizens can receive better assistance on prioritizing debts to the government since all cases are collected in one platform.⁸⁸ AfdG noted large traffic

to My Overview (it was the second most visited platform on borger.dk in 2021) and high satisfaction among users.⁸⁹ Moreover, according to AfDG, public agencies from neighboring countries have looked to My Overview as an example for their own public sector digitalization work.⁹⁰

Commitment 6: Independent rule of law unit in the Danish Appeals Agency

- | | |
|--|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Moderate | <ul style="list-style-type: none"> • Completion: Substantial • Did it open government? Marginal |
|--|---|

Under this commitment, the Ministry of Social Affairs aimed to increase the transparency of case handling in the social services sector (particularly for socially vulnerable groups) by establishing an independent rule of law unit within the Danish Appeals Agency.⁹¹ The ministry established the rule of law unit with an advisory body of eight organizations, including socially vulnerable groups.⁹² The advisory body proposes social problems for the unit to analyze.⁹³ The advisory body presents nonbinding recommendations to the Ministry of Social Affairs, the Domestic Social Affairs Committee, and to relevant organizations or affected citizens.⁹⁴ The final report on the unit’s work is expected in 2024 if it receives additional funding.⁹⁵ As the final report was an activity under this commitment, IRM assesses the commitment as substantially, rather than fully, completed.

The unit’s analyses and hearing papers are available on the website of the Danish Board of Appeals.⁹⁶ The unit has so far carried out five analyses – three on municipalities’ guidance to socially vulnerable groups, one on case processing time for adults with disabilities, and one on the placement of children without their consent. The former Minister of Social Affairs encouraged municipalities to work with the unit’s recommendations when developing the Child’s Law (“Barnets Lov”) that will be implemented in 2023.⁹⁷ Because the rule of law unit has so far carried out only a few analyses and it is unclear whether it will continue to receive funding, IRM assesses this commitment as having a marginal effect on government openness so far.

Commitment 7: Whistleblower schemes in the Danish Ministry of Justice

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Moderate | <ul style="list-style-type: none"> • Completion: Complete • Did it open government? Marginal |
|--|--|

This commitment is assessed in Section II.

⁶³ Editorial notes:

1. For commitments that are clustered: The assessment of potential for results and “Did it open government?” is conducted at the cluster level, rather than the individual commitment level.
2. Commitments’ short titles may have been edited for brevity. For the complete text of commitments, please see Denmark’s action plan: <https://www.opengovpartnership.org/documents/denmark-action-plan-2019-2021/>
3. For more information on the assessment of the commitments’ design, see Denmark’s Design Report: <https://www.opengovpartnership.org/documents/denmark-design-report-2019-2021/>

⁶⁴ “Digidata,” Rigsarkivet website, accessed March 17, 2023, <https://digidata.rigsarkivet.dk/>.

⁶⁵ “Ny platform gør det nemmere at finde digitalt skabte data,” Rigsarkivet, July 8, 2022, <https://www.rigsarkivet.dk/nyheder/ny-platform-goer-det-nemmere-at-finde-digitalt-skabte-data/>.

⁶⁶ Interview with Danish National Archives representative, February 15, 2023; A person can apply for an early retirement pension if she/he has associated with the labor market for a certain period of time (between 42 and 44 years depending on year of birth) and data from Digidata can help citizen prove the number of years in the workforce; “Tidlig pension,” FOA website, accessed April 17, 2023, <https://www.foa.dk/raad-regler/pension/tidlig-pension>.

⁶⁷ “API med tilsynsdata,” Arbejdstilsynet website, accessed June 5, 2023, <https://at.dk/arbejdsmiljoe-i-tal/tilsyn-i-tal/api-med-tilsynsdata/>.

⁶⁸ “Arbejdsmiljø i tal,” Arbejdstilsynet website, accessed March 17, 2023, <https://at.dk/arbejdsmiljoe-i-tal/>.

⁶⁹ Interview with the Danish Working Environment Authority, February 10, 2023.

⁷⁰ Danish Working Environment Authority, interview.

⁷¹ “Hydrologisk Informations- og prognosesystem,” Styrelsen for Dataforsyning og Infrastruktur website, accessed March 17, 2023, <https://hip.dataforsyningen.dk/#historical/2/600000/6225000/0/b01/1154165643414/day//high>.

⁷² “HIP – et Hydrologisk Informations- og Prognosesystem,” Styrelsen for Dataforsyning og Infrastruktur website, accessed March 17, 2023, <https://hip.dataforsyningen.dk/about>.

⁷³ “Nyt PULS-system er i luften,” Danmarks Miljøportal website, published February 5, 2020, <https://miljoportal.dk/nyheder/2020/nyt-puls-system-er-i-luften/>.

⁷⁴ Interview with the Agency for Data Supply and Infrastructure (SDFI), February 16, 2023.

⁷⁵ Klimatilpasning, KAMP, accessed June 5, 2023, <https://kamp.klimatilpasning.dk/grundvand/dataset2?value=nf%2Cmean>.

⁷⁶ “Brugerforum,” Hydrologisk Informations- og Prognosesystem website, accessed April 18, 2023, <https://hip.dataforsyningen.dk/forum>.

⁷⁷ *Databrug i klimatilpasning: Klimatilpasning i kommunerne 2020-2021* (KL), accessed June 5, 2023, <https://www.kl.dk/media/29051/brug-af-data-i-klimatilpasningen.pdf>.

⁷⁸ Interview with Styrelsen for Dataforsyning og Infrastruktur, February 21, 2023.

⁷⁹ “Ofte stillede spørgsmål angående klimatilpasning,” Klimatilpasning website, accessed March 17, 2023, <https://www.klimatilpasning.dk/sektoer/byggeri/faq/>.

⁸⁰ “Om Mit Overblik,” Borger.dk website, accessed March 17, 2023, <https://www.borger.dk/Om-borger-dk/Saadan-bruger-du-borgerdk/om-mit-overblik>.

⁸¹ “Om Mit Overblik,” Borger.dk website.

⁸² Digitaliseringsstyrelsen, “Evaluering af Mit Overblik – Etape 1,” August 2021, <https://digst.dk/media/24735/evalueringsrapport-af-mit-overblik-etape-1.pdf>.

⁸³ Digitaliseringsstyrelsen, “Evaluering af Mit Overblik – Etape 1.”

⁸⁴ “Konsulenter leverer afgørende viden til samfundsreformer,” *Dansk Erhverv*, April 4, 2022, <https://www.danskerhverv.dk/presse-og-nyheder/nyheder/2022/april/deloitte-om-konsulentstop/>.

⁸⁵ “Tidsplan for Mit Overblik,” Digitaliseringsstyrelsen website, accessed March 17, 2023, <https://digst.dk/digital-service/mit-overblik/tidsplan-for-mit-overblik/>.

⁸⁶ Interview with Digitaliseringsstyrelsen, February 23, 2023.

⁸⁷ Digitaliseringsstyrelsen, interview.

⁸⁸ Digitaliseringsstyrelsen, interview.

⁸⁹ Digitaliseringsstyrelsen, “Evaluering af Mit Overblik – Etape 2,” June 2022, <https://digst.dk/media/27776/mit-overblik-evaluering-etape-2.pdf>.

⁹⁰ Digitaliseringsstyrelsen, interview.

⁹¹ The Ministry administers the unit, while the work of the unit is directed at the Appeals Agency Ankestyrelsen, “Retssikkerheden i Ankestyrelsen,” Ankestyrelsen website, accessed April 18, 2023, <https://ast.dk/om-ankestyrelsen/hovedopgaver/retssikkerhedsenheden/retssikkerhedsenheden-i-ankestyrelsen>.

⁹² These include the Local Government Denmark (KL), Danish Social Counselor Association (DS), Disabled People’s Organizations Denmark (DPOD), the National Council for Children, JUSTITIA, the Impartial Consultant Scheme in the Disability Area (DUKH), Institute for Human Rights, and the Council for the Socially Vulnerable; “Retssikkerheden i Ankestyrelsen,” Ankestyrelsen website.

⁹³ "Undersøgelser fra Retssikkerhedsenheden," Ankestyrelsen website, accessed April 18, 2023,

<https://ast.dk/publikationer/emneopdelte-publikationer/undersogelser-fra-retssikkerhedsenheden>.

⁹⁴ "Aftale om udmøntning af reserven til foranstaltninger på social-, sundheds og arbejdsmarkedsområdet 2020-2023" (Regeringen, pp. 8), <https://www.regeringen.dk/media/7631/aftale-om-udmoentning-af-reserven.pdf>.

⁹⁵ Interview with the Ministry of Social Affairs, February 23, 2023.

⁹⁶ "Undersøgelser fra Retssikkerhedsenheden," Ankestyrelsen website.

⁹⁷ "Kommunernes vedledningspligt – gør de det godt nok?" DUKH website, accessed March 17, 2023,

<https://www.dukh.dk/Om-DUKH/Nyheder/Kommunernes-vedledningspligt-%E2%80%93-gør-de-det-godt-nok->.