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OpenGov Washing: The Gap Between Promised and Achieved Openness in Open Government

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Περίληψη

Η παρούσα διπλωματική εργασία εξετάζει το φαινόμενο του OpenGov Washing, δηλαδή τις περιπτώσεις στις οποίες φορείς της δημόσιας διοίκησης υιοθετούν τη ρητορική, τα εργαλεία και τις διαδικασίες της ανοικτής διακυβέρνησης με κυρίως συμβολικό τρόπο, χωρίς αντίστοιχη ουσιαστική ενσωμάτωση των αρχών της διαφάνειας, της συμμετοχής και της λογοδοσίας. Σκοπός της εργασίας είναι η εννοιολογική αποσαφήνιση, η τυπολογία και η ερμηνευτική ανάλυση του φαινομένου, καθώς και η διαμόρφωση ενός πλαισίου αξιολόγησης της αυθεντικότητας των σχετικών πρωτοβουλιών.

Μεθοδολογικά, η έρευνα ακολουθεί ποιοτική και ερμηνευτική προσέγγιση, βασισμένη σε συγκριτική ανάλυση δεκαπέντε μελετών περίπτωσης από το πεδίο της ανοικτής διακυβέρνησης. Η θεωρητική της θεμελίωση αντλεί κυρίως από τη Θεσμική Θεωρία και τη Θεωρία της Δημόσιας Αξίας.

Τα αποτελέσματα δείχνουν ότι το OpenGov Washing λειτουργεί ως όρος-ομπρέλα που περιλαμβάνει διαφορετικές εκδηλώσεις προσχηματικής ανοικτότητας, όπως η συμβολική συμμόρφωση, η ορατότητα χωρίς ουσιαστική λογοδοσία, η συμμετοχή χωρίς διοικητική ανταπόκριση και η τεχνική υλοποίηση χωρίς οργανωτική ενσωμάτωση. Η εργασία προτείνει την έννοια του κενού θεσμοποίησης ως ενοποιητικό ερμηνευτικό σχήμα και διαμορφώνει το Πλαίσιο Αυθεντικότητας της Ανοικτής Διακυβέρνησης (Opengov Authenticity Framework - OAF) ως διαγνωστικό πλαίσιο αξιολόγησης.

Συμπερασματικά, υποστηρίζεται ότι η ύπαρξη εργαλείων ανοικτής διακυβέρνησης δεν αρκεί από μόνη της ως ένδειξη ουσιαστικής ανοικτότητας, εφόσον το κρίσιμο ζήτημα είναι η θεσμική ενσωμάτωση, η λογοδοτική λειτουργία και ο μετρήσιμος δημόσιος αντίκτυπος των σχετικών πρωτοβουλιών.

Λέξεις - Κλειδιά: Ανοικτή Διακυβέρνηση, Προσχηματική Ανοικτότητα, Κενό Θεσμοποίησης, Δημόσια Αξία, Λογοδοσία

Abstract

This thesis examines the phenomenon of OpenGov Washing, referring to cases in which public sector actors adopt the rhetoric, tools and procedures of open government in a predominantly symbolic manner, without a corresponding substantive incorporation of the principles of transparency, participation and accountability. The purpose of the study is to conceptually clarify, typologize and interpret this phenomenon, while also developing a framework for assessing the authenticity of open government initiatives.

Methodologically, the research follows a qualitative and interpretive approach based on the comparative analysis of fifteen case studies drawn from the field of open government. Its theoretical foundation is mainly informed by Institutional Theory and Public Value Theory.

The findings show that OpenGov Washing functions as an umbrella term encompassing different manifestations of performative openness, including symbolic compliance, visibility without substantive accountability, participation without administrative responsiveness, and technical implementation without organizational embedding. The study proposes the concept of the institutionalization gap as a unifying interpretive framework and develops the OpenGov Authenticity Framework (OAF) as a diagnostic tool for evaluating the authenticity of such initiatives.

In conclusion, the thesis argues that the mere existence of open government tools or initiatives is not in itself evidence of substantive openness, since the critical issue lies in the degree to which such initiatives are institutionally embedded, accountability-enhancing and capable of producing measurable public impact.

Keywords: OpenGov Washing, Open Government, Institutionalization Gap, Public Value, Accountability

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Acronyms – Abbreviations

AI	Artificial Intelligence
API	Application Programming Interface
BEUC	European Consumer Organisation
DPC	Data Protection Commission
DWP	Department for Work and Pensions (UK)
ECDC	European Centre for Disease Prevention and Control
EDPB	European Data Protection Board
ENNHRI	European Network of National Human Rights Institutions
ESIDIS	National Electronic Public Procurement System
FOIA	Freedom of Information Act
GFOSS	Open Technologies Alliance
GNCHR	Greek National Commission for Human Rights
GODI	Ghana Open Data Initiative
GRECO	Group of States against Corruption
ICCL	Irish Council for Civil Liberties
IRM	Independent Reporting Mechanism
KHMDIS	Central Electronic Register of Public Procurement
MAPS	Methodology for Assessing Procurement Systems
MOOC	Massive open online course
NITA	National Information Technology Agency
NTA	National Transparency Authority
OAF	Opengov Authenticity Framework
OAS	Organization of American States
ODM	Open Data Maturity
OECD	Organisation for Economic Co-operation and Development
OGP	Open Government Partnership
OPN	Online Publication Number
GDPR	General Data Protection Regulation
PDF	Portable Document Format
WCA	Work Capability Assessment

1. Introduction

1.1 The Context: The Evolution of Digital Governance and the Emergence of Openness

The role of the state in modern societies is undergoing structural transformations, driven by the imperative need for greater efficiency, transparency and accountability, as well as the demand to restore shaken citizen trust in institutions. In this evolving environment, the utilization of Digital Technologies is no longer limited to the simple digitization of existing bureaucratic processes; instead, it leads to the broader Digital Transformation of public administration (Dunleavy, 2005). According to contemporary literature, the evolution of Digital Governance has not been linear but is distinguished into three basic generations or approaches, which reflect different administrative paradigms and objectives (Charalabidis et al., 2019). The first generation, known as Digital Governance 1.0, was based on the "Managerial Approach" and was decisively influenced by the model of New Public Management. The primary goal of this period was the use of technology to increase efficiency, reduce operating costs and provide electronic services (e-services) to citizens and businesses (Hood, 1991; Αποστολάκης et al., 2022), essentially relegating the state-citizen relationship to a transactional provider-customer relationship, stripped of its political dimension.

However, the unilateral focus on economic efficiency and the instrumental treatment of the citizen gradually brought about a political legitimacy deficit and the institutional alienation of citizens from decision-making centers (Denhardt & Denhardt, 2000). In response to the need of reconnecting the "vision" of administration with the "voice" of society (Meijer et al., 2012), the second generation emerged: Digital Governance 2.0. This phase is characterized by the "Participatory Approach", which draws its foundations from the model of Participatory Democracy and Open Public Administration (Αποστολάκης et al., 2022). At the heart of this generation lies Open Government, which is not content with the digitization of services but aims to enhance two-way communication, ensure transparency and actively involve citizens in policy formulation through digital consultation tools and the provision of open data (Charalabidis et al., 2016). The institutional consolidation of this approach was internationally sealed with the founding of the Open Government Partnership (OGP) in 2011, which acted as a catalyst for the dissemination of the principles of transparency and accountability at a global level, creating a worldwide network of reformers (Piotrowski, 2017; Φύτρος & Βήττου, 2025).

Today, public administration is transitioning toward the third generation (Digital Governance 3.0), which focuses on evidence-based policy making and the creation of substantive Public Value. This approach, leveraging advanced technologies such as Artificial Intelligence and Big Data analytics, seeks to move beyond mere effectiveness to satisfy broader social expectations, such as trust, legitimacy and service quality (Alexopoulos et al., 2025; Panagiotopoulos et al., 2019). Consequently, Open Government is now called upon to be evaluated not only on the basis of its processes but through the lens of Public Value Theory, examining whether openness actions produce real social impact (Twizeyimana & Andersson, 2019; Φύτρος, 2026).

1.2 The Problem: From Technological 'Open Washing' to Performative Open Government

Despite the institutional consolidation of Open Government and the progress made within the OGP framework, the transition from the rhetoric of openness to practical application is often characterized by significant discrepancies. While governments officially commit to transparency and participation, empirical reality and independent evaluations frequently demonstrate phenomena of superficial compliance. As Lee-Geiller and Ali (2025) point out, many openness policies are characterized by a "recurrent liberalism", where governments recycle older commitments or focus exclusively on the economic value of data, avoiding structural reforms that would overturn established hierarchies and redistribute power within the administration (Lee-Geiller & Ali, 2025). In these cases, participation in international organizations turns into a "smokescreen" for drawing legitimacy from the international community and enhancing the government's prestige (Fraundorfer, 2017; Ingrams, 2020; Φύτρος & Βήττου, 2025). This problem becomes even more critical in a conjuncture where state commitments to open government coexist with broader trends of democratic backsliding. As Lee-Geiller et al. (2026) point out, adherence to open government reforms cannot be reduced to a single motive; rather, it is contingent upon multiple and often overlapping logics of coercion, imitation, attraction and competition, which frequently coexist within the same policy discourse (Lee-Geiller et al., 2026).

This gap between "promising" and "performing" policy is described in international literature by the term "Open Washing". The concept traces its origin to "Greenwashing", but was specifically introduced into the technology sector in 2009 by Michelle Thorne (Mozilla Foundation) to describe the practice of organizations that appropriate open-source rhetoric for marketing purposes without adopting a culture of participation. Later, the term was specialized in the field of open data by Christian Villum (2014), who defined it as the difference between simply "making available" and the actual "opening" of data (Villum, 2014). This phenomenon has also been documented in academia, where the adoption of open access policies often remains mere "lip service" without practical effect (Vlaeminck & Podkrajac, 2017), as well as in the field of education, describing how the term "open" is often used for commercialization without real freedom of use (Farrow, 2017). More recently, the term has also been used to criticize Artificial Intelligence (AI) giants that characterize themselves as "open source" for marketing purposes and to avoid regulatory oversight, while in reality, they keep critical elements of their systems closed, thereby avoiding substantive scrutiny and accountability (Gibney, 2024; Liesenfeld & Dingemanse, 2024).

The transfer of this practice from the private sector to Public Administration creates the need for the introduction of a specialized term: Opengov Washing. The neologism "Opengov Washing" is proposed to describe this specific strategy, focusing on public organizations and their tendency to symbolically adopt the structures and tools of open government without internalizing its fundamental values (Brandusescu, 2016; Fytros, 2025). This phenomenon manifests in multiple ways: through the publication of low-quality data that cannot be reused (Data Washing); through the conduct of pretextual consultations where citizen input is ignored, known as Citizenwashing (O'Reilly, 2023); and through the adoption of "window-dressing" digital applications that remain inactive. This practice implies an approach of "Technological Solutionism", where complex social

problems are treated as simple technical challenges (Morozov, 2014), without producing substantive social impact (Schnell, 2020).

1.3 Purpose of the Research

The purpose of this study is to identify, systematically analyze and categorize practices of Performative Open Government within public administration, as well as to develop a framework for assessing the authenticity of open government initiatives. The research aspires to move beyond a descriptive approach and provide an interpretive analysis of the phenomenon's causes, utilizing two central theoretical pillars.

On one hand, the analysis is based on Institutional Theory, which provides the necessary interpretive background for understanding organizational behavior (Boxenbaum & Jonsson, 2008; Pirrolas & Correia, 2025). Through this lens, "washing" is interpreted as a strategy of "decoupling", where organizations symbolically adopt modern practices to secure legitimacy (Isomorphism) from the external environment, while keeping the organization's functional core activities insulated from declared openness policies (Heimstädt, 2017; Meyer & Rowan, 1977). On the other hand, the research utilizes Public Value Theory, which sets as a criterion for success not only the production of outputs but the creation of measurable social results (outcomes) and the enhancement of trust, thus allowing for the distinction between substantive and apparent openness (Alford & O'Flynn, 2009; Allhutter et al., 2024; Moore, 1995; Panagiotopoulos et al., 2019; Φύτρος, 2026).

At the same time, the study seeks to bridge the theoretical literature on open government and the aforementioned interpretive background with empirical evidence from specific institutional cases, ensuring that the relevant concepts are examined not only at an abstract level but also within verifiable political and administrative contexts. Furthermore, a heterogeneous set of publicly available material is critically utilized and systematized, including interventions and documentation from civil society organizations, which have recorded aspects of the phenomenon that have not yet been subject to equally extensive academic processing. The central ambition is the creation of a user-friendly Assessment Framework, which will not be addressed exclusively to researchers but will serve as an empowerment tool for civil society itself. By providing citizens with clear criteria for distinguishing these phenomena, the study aims to equip them with strong arguments to recognize performative open government actions and exert pressure on governments for more substantive openness (O'Reilly, 2023; Schmidhuber & Hilgers, 2021).

1.4 Research Questions

The present study seeks to address a series of critical questions concerning the nature, evolution, and detection of the phenomenon of symbolic openness. Primarily, it investigates the conceptual definition of Performative Open Government (Opengov Washing), examining how this practice evolved and was transferred from the private and technological sectors to the field of politics and public administration, acquiring distinct characteristics. Furthermore, a central objective is the identification of the discrete qualitative characteristics and operational criteria that differentiate an authentic open government action from a performative one, thus allowing for the measurement of the discrepancy between policy rhetoric (promising) and administrative practice (performing). Subsequently, the research focuses on the ways in which the various

manifestations of the phenomenon – such as data obfuscation, tokenistic participation, and inactive platforms – can be empirically detected, seeking the measurable technical, organizational and institutional traces that reveal them. Finally, based on these findings, corresponding methods for mitigating phenomena of performative openness are proposed.

Consequently, the present study is organized around three primary research questions:

1. How does the phenomenon of Performative Open Government manifest in public administration and what are its basic typological forms?
2. Which mechanisms explain the discrepancy between declared and substantive openness, and how do these translate into criteria for assessing authenticity?
3. Which institutional and policy interventions can mitigate Opengov Washing and enhance the production of public value?

These questions constitute the core research axis of the thesis and allow for a systematic transition from the empirical mapping of the phenomenon to the interpretation of its generative mechanisms and, finally, to the formulation of relevant policy recommendations.

1.5 Structure of the Study

The study is structured into six chapters, following a trajectory from theoretical foundation and methodological clarification toward empirical analysis and the formulation of a diagnostic framework for assessing the authenticity of open government actions.

In Chapter 1, the introductory context of the research has already been presented. The evolution of digital governance and the gradual emergence of the concept of openness as a core principle of public policy were examined, the problem of the performative implementation of open government practices was highlighted, and the purpose and research questions of the study were formulated.

Chapter 2 develops the theoretical overview. It presents the conceptual and historical framework of open government and examines the concept of "washing" – from greenwashing to practices of performative openness. It also analyzes the contribution of Institutional Theory, particularly the concepts of isomorphism and decoupling, in interpreting the gap between institutional declaration and practical application. Simultaneously, Public Value Theory is presented as a normative framework for assessing substantive openness. Finally, a concise overview of existing literature regarding efforts to "measure" open government is conducted, in terms of maturity models, benchmarking tools and assessment frameworks for open government actions.

Chapter 3 describes the research methodology. It presents the research approach, the methodological strategy followed and the selection process for the case studies used for the empirical investigation of the phenomenon.

Chapter 4 develops the typology of the opengov washing phenomenon and presents its individual forms in detail through case studies from Greece and the international environment. The cases are organized into specific categories – such as data washing, institutional/compliance washing, participation washing, transparency washing and the so-called "ghost platforms" – in order to highlight the different mechanisms through which the institutional or technological appearance of openness can be decoupled from substantive accountability, transparency or participation.

Chapter 5 undertakes a comparative synthesis of the case study findings. Through the development of the previously established typology, the key institutional and organizational mechanisms that produce opengov washing phenomena are identified, such as symbolic compliance, visibility without accountability, technological implementation without organizational integration, participation without institutional absorption and the fragility of the digital infrastructure life cycle. Based on this synthesis, the Opengov Authenticity Framework (OAF) is proposed – a diagnostic framework for assessing the authenticity of open government actions.

Finally, Chapter 6 presents the conclusions of the study. It summarizes the key empirical and theoretical findings, highlights the conceptual contribution of the opengov washing concept and the proposed assessment framework, formulates policy recommendations for avoiding performative openness practices and notes the limitations of the study as well as directions for future research.

2. Theoretical Overview

2.1 Open Government: Conceptual Framework, Historical Evolution, and Critical Consideration

The concept of Open Government (OG) constitutes a dynamic and evolving field that attempts to redefine the institutional relationship between the state and its citizens. According to Meijer, Curtin, and Hillebrandt (2012), Open Government should be understood not merely as a set of technical arrangements for publishing information, but as a process that connects the "vision" of the administration with the "voice" of society, seeking a transition from secrecy to collaborative democracy (Meijer et al., 2012).

Although the roots of the concept trace back to the Enlightenment, its modern version has been codified through the definitions of international organizations, which, however, present subtle but significant variations. The Organisation for Economic Co-operation and Development (OECD) adopts a more technocratic-managerial approach, defining Open Government as a culture of governance based on innovative and sustainable public policies and practices, grounded in the principles of transparency, integrity, accountability, and stakeholder participation, with the aim of promoting democracy and inclusive growth (OECD, 2016).

On the other hand, the Open Government Partnership (OGP), through its 2011 founding Declaration, introduces a stronger normative and political dimension to the definition. While the OECD focuses on administrative effectiveness, the OGP explicitly emphasizes the need for "citizen empowerment", "fighting corruption", and "leveraging new technologies" to strengthen governance (Open Government Partnership, 2011). In the OGP's definition, technology is not merely a management tool but a means for democratic deepening, while cooperation with Civil Society is highlighted as a structural element rather than a simple consultative process.

Historically, the resurgence of interest in openness is inextricably linked to the technological revolution of the Internet. The transition from Web 1.0 to the participatory Web 2.0 created the conditions for the "Government 2.0" (Gov 2.0) model, where citizens cease to be passive consumers of information or services. As O'Reilly (2011) pointed out, the goal is the evolution of the state into a "Platform" (Government as a Platform), where public administration provides open data and infrastructure, allowing society to co-create solutions (O'Reilly, 2011).

The institutional peak of this trend occurred in 2011 with the founding of the Open Government Partnership by eight countries (Brazil, Indonesia, Mexico, Norway, Philippines, South Africa, United Kingdom, USA). This initiative introduced an innovative accountability mechanism through the co-creation of National Action Plans and the Independent Reporting Mechanism (IRM), aspiring to bridge the gap between governments and citizens. However, the rapid expansion of the institution was accompanied by corresponding criticism regarding its substantive effectiveness.

In a highly significant recent analysis, Lee-Geiller and Ali (2025), studying OGP action plans, distinguish between two trends: "recurrent liberalism" and "innovative liberalism". Their research demonstrates that many open government policies do not introduce real innovations but instead recycle existing neoliberal market and management practices,

focusing on the economic value of data rather than democratic deepening (Lee-Geiller & Ali, 2025).

Jonathan Fox (2015) has already delved into this critique to some extent, introducing the fundamental distinction between "tactical" and "strategic" approaches to social accountability. According to Fox, many openness initiatives are limited to providing information and encouraging citizen "voice" – namely, the ability to submit requests or complaints (J. A. Fox, 2015). However, voice alone is not enough. For substantive accountability to exist, "teeth" are required – that is, the institutional capacity and will of the state to respond to that voice by imposing sanctions or corrective measures. When open government actions strengthen voice without possessing teeth, we are led to a state of "uncertain accountability". In these cases, consultation platforms turn into echo chambers, where citizen demands are recycled without producing results, creating the illusion of participation and ultimately leading to disappointment.

In the same vein, Fenster (2015) criticizes the very theoretical basis of transparency, arguing that it is often treated as a "magical concept" that automatically promises accountability, while in practice, it can function as a tool for managing the image of power without revealing the actual decision-making processes (Fenster, 2015). Consequently, while the OGP and Open Government in general began as promising paradigms for reform, empirical observation indicates the risk of their transformation into a "smokescreen" (Fraundorfer, 2017). This discrepancy between promised and performed policy (Piotrowski, 2017) creates the ground for the emergence of Performative Open Government practices, which will be analyzed in detail below.

2.2 The Washing Phenomenon: From Greenwashing to Performative Openness

In order to understand the discrepancy between the declarations and the implementation of Open Government, a genealogical examination of the phenomenon described internationally as "Washing" is essential. The etymology of the term traces back to Greenwashing, a concept coined in 1986 by environmentalist Jay Westerveld. Westerveld used the term to denounce the hypocritical practice of a hotel unit placing cards urging guests to reuse beach towels to "save the planet". In reality, as he pointed out, the company's sole motive was to reduce laundry operating costs, as it implemented no other substantive ecological policy (Nakamura, 2022). In contemporary literature, the phenomenon is now defined as the intersection between poor environmental performance and the parallel positive communication projection of ecological sensitivity (Delmas & Burbano, 2011).

In the digital age, this practice evolved by acquiring new characteristics. The term "Open Washing" was first introduced in 2009 by Michelle Thorne, an executive at the Mozilla Foundation. Thorne used the term to describe the tendency of companies and organizations to appropriate the rhetoric of open source and open standards for marketing purposes without, however, adopting the culture of participation and sharing that governs them. As she characteristically noted, "having an open standard does not necessarily mean your process is open" (Thorne, 2009). This concept found fertile ground and was further specialized in the field of Open Data. Christian Villum (2014), extending the definition, described open washing as the difference between simply "making available" and the actual "opening" of data. As a characteristic example, he cited Google Maps: although

mapping data is freely accessible for viewing by the public, it remains legally and technically closed for reuse or export, creating an illusion of openness that exclusively serves the company's business interests (Villum, 2014).

The phenomenon has also been empirically documented in academia. Vlaeminck and Podkrajac (2017), studying scientific journals in the field of Economics, demonstrated that while many adopt open data policies, in practice, very few ensure that the data are accessible and reproducible ("paying lip service"). Specifically, they found that researchers often provide data in proprietary formats or incomplete files that make the reproducibility of results impossible, effectively nullifying the scientific value of open access (Vlaeminck & Podkrajac, 2017). This "rhetorical compliance" constitutes the core of washing: the adoption of the label without the content.

At the same time, Robert Farrow (2017) extended the analysis to the field of education. In particular, he criticized providers of Massive Open Online Courses (MOOCs) and educational organizations that use the "Open" label as a marketing tool while, in reality, they restrict the rights to use, modify and redistribute the material, violating the fundamental principles of Open Educational Resources (OER) (Farrow, 2017). More recently, Matteo Moretti (2020) highlighted another dimension, focusing on the design of open data portals. According to Moretti, the bulk publication of data stripped of the context in which it was produced, and/or the lack of data visualization tools, constitutes a form of washing, as it practically excludes the average citizen from using them, transforming transparency into a technocratic privilege (Moretti, 2020).

In the modern landscape, the phenomenon takes on new dimensions with AI Washing. A characteristic field of application involves Large Language Models (LLMs), where technology companies label themselves as supporters of "Open Source AI" for commercial promotion purposes. A prime example is Meta's LLaMA model, which, despite being presented with the rhetoric of openness, has faced intense criticism from the research community. As Liesenfeld and Dingemanse (2024) document, this is often a misleading use of the term: while companies may freely release the model "weights" for use, they keep the training data and their preparation code strictly closed (Liesenfeld & Dingemanse, 2024). This practice makes it impossible to substantively audit for biases or fully reproduce the model, violating the core of open science and turning "openness" into a tool for evading regulatory oversight (Gibney, 2024).

From the overview of the forms mentioned above, it becomes clear that the concept of "Open Washing" now functions as a broad term encompassing various interpretations and applied to different aspects of openness (data, code, standards, education). Precisely because of this conceptual breadth, the need arises for a methodological distinction of the phenomenon within the specific field of Public Administration. This distinction is deemed essential to isolate the specific administrative and political mechanism within open government and to enable the systematic specialization of its causes, methodologies and institutional consequences, separating it from purely technical or corporate manifestations of "open washing". In this context, this study proposes and specifies the neologism "Opengov Washing" (in the sense of Performative Open Government). This term is not limited to data quality but covers all pillars of open government. It is defined as the strategic choice of public organizations to adopt the "language" and "tools" of openness to legitimize predetermined decisions or to simulate participation, without ceding real power or allowing substantive oversight (Fytros, 2025; Heimstädt, 2017).

2.3 Institutional Theory: From Isomorphism to the Strategy of Decoupling

The gap between the rhetoric of political announcements and actual political and administrative practice in Open Government is particularly valuable to approach through the lens of Neo-institutionalism, and specifically Sociological Institutional Theory. In contrast to rational choice approaches, which treat organizations as purely instrumental actors with the sole objective of maximizing efficiency, Institutional Theory argues that organizations function as open systems deeply influenced by their environment. The decisive motive for organizational behavior is not only functional efficiency but primarily the securing of social legitimacy and survival through compliance with dominant social norms and expectations (Meyer & Rowan, 1977).

As early as the foundational work of Meyer and Rowan (1977), it was highlighted that modern bureaucracies often adopt structures and practices as "myths" and "ceremonies" because they are considered socially correct and necessary for legitimacy, regardless of their impact on organizational productivity. This distinction between substantive transformation and symbolic adaptation is central to understanding the phenomenon of openwashing in open government under the lens of Institutional Theory.

The conceptual foundation for a more systematic explanation of organizational uniformity was established by DiMaggio and Powell (1983) with the concept of institutional isomorphism. In their landmark article "The Iron Cage Revisited", they describe how organizations operating within a common field tend to become increasingly similar to one another, not due to competition or best practices, but because of institutional pressures for compliance (DiMaggio & Powell, 1983). The authors distinguish three mechanisms of isomorphism:

- (a) Coercive Isomorphism: Stems from pressures of authority and enforcement (e.g. legislation, regulations from superior authorities or donor requirements).
- (b) Mimetic Isomorphism: Occurs under conditions of uncertainty, when organizations copy models that are considered successful or modern, seeking a safe solution for legitimacy (e.g. replicating the pioneering open data models of the USA or Estonia).
- (c) Normative Isomorphism: Originates from common standards set by professional communities (e.g. IT professionals imposing specific "correct" standards as commonly accepted).

These mechanisms prove particularly useful in the analysis of Open Government, as the phenomenon of openness in the public sector can largely be seen as a result of such pressures for institutional uniformity. In practice, the international agenda – as expressed through initiatives like the Open Government Partnership (OGP) or international assessment indices – creates a powerful institutional environment of expectations. States and public organizations feel the pressure to align with these expectations in order to be considered modern and legitimate.

The joining of initiatives such as the OGP and the adoption of "modern" open government tools (e.g. national open data portals, e-consultation platforms) is often guided more by the "logic of appropriateness" than by documented functional needs (March & Olsen, 2009). In other words, states act on the rationale that "this is what a modern democratic state is supposed to do", adopting openness policies as a confirmation of their modernization, regardless of whether internal administrative readiness or actual social demand exists. It is characteristic that governments create an increasing number of data

portals with declaratory goals such as enhancing transparency and innovation, despite the fact that in practice, few of these benefits have been systematically proven. Researchers have highlighted this "signaling" trend, where the adoption of digital tools occurs primarily to improve the "external" image and satisfy international evaluations (Janssen et al., 2012). Correspondingly, studies by Schmidhuber and Hilgers (2021) at the local level demonstrate that the implementation of open government depends significantly on whether leaders believe in its institutional importance, emphasizing the role of perceptions and institutional pressures in the dissemination of these practices (Schmidhuber & Hilgers, 2021).

However, the transition from institutional pressure to practical application is not a socially or politically neutral process. Jane Fountain (2001), analyzing the "Virtual State", has aptly observed that the introduction of new governance technologies does not occur in a social vacuum but within existing institutions. The institutional framework "enacts" the technology, often modifying its mode of implementation to adapt to established organizational structures (Fountain, 2001). Thus, instead of technology inherently transforming processes, organizations often merely incorporate new digital tools into already entrenched bureaucratic patterns, reproducing existing practices rather than radically reforming them (Αποστολάκης et al., 2022).

This observation coincides with the general finding of institutional theory that organizational changes can be superficial or substantive: under the pressure of powerful institutional myths, organizations often adopt the surface of a reform (its form) without, however, changing their mode of operation in depth (Janssen et al., 2012). This is referred to as "ceremonial conformity", as opposed to actual transformation. In the case of open government, ceremonial conformity is evident when, for example, a public organization develops an ambitious open data platform to comply with international trends, but internally continues to operate with a culture of secrecy and fails to substantively utilize this data in decision-making.

The most critical point of contact between Institutional Theory and the subject of the present study is the concept of "Decoupling", as described by Meyer and Rowan (1977). In order to resolve the contradiction between external pressures for modernization and the internal need for stability and control, organizations often disconnect the "window-dressing" of their formal structure from actual, internal administrative practices (Meyer & Rowan, 1977). This creates two parallel realities within the same organization: utilizing Goffman's (1959) dramaturgical analogy, we observe, on one hand, the "front stage", where the organization publicly displays symbols of openness – e.g. launching transparency websites, enacting open data laws, etc. – aiming to satisfy the institutional environment and derive legitimacy. On the other hand, in the "back stage", established practices of decision-making and administrative control remain essentially unaffected: they maintain their hierarchical, closed and opaque form, shielded from external scrutiny (Heimstädt, 2017).

As Heimstädt (2017) empirically demonstrated in studies of open data in major cities (New York, London, Berlin), public entities often project a rhetoric of openness externally, while simultaneously implementing practices of concealment or selective disclosure behind the scenes to maintain control. In other words, a "performance" of publicity is observed in the public sphere, while the actual work continues "behind the curtain", away from prying eyes. This practice leads to what Fox (2007) has defined as

"opaque transparency": a state where the dissemination of information is shallow or fragmented, resulting in the failure to reveal the essence of institutional behavior (J. Fox, 2007).

The term Opengov Washing describes precisely this disproportion between public expectations for open information and the manner in which a public organization actually provides (or conceals) that information. Institutional theory allows for the understanding of Opengov Washing not merely as an isolated instance of insincerity, but as a structural mechanism of organizational adaptation. Under conditions of intense institutional pressure, a bureaucratic organization adopts new structures (to reap legitimacy benefits), while simultaneously neutralizing their substantive function to avoid disrupting the internal balance of power. The appearance of reform thus functions as a "myth" of legitimacy, allowing the organization to survive within the institutional environment without transforming the core of its action (Roszkowska-Menkes et al., 2024). As Boxenbaum and Jonsson (2008) note, decoupling constitutes a classic organizational strategy to "disconnect" core activities from institutional requirements: this ensures an apparent compliance, while effectiveness and control within the inner workings of the organization remain intact (Boxenbaum & Jonsson, 2008).

In conclusion, Institutional Theory provides the conceptual tools to interpret why open government often degenerates into symbolic politics: it concerns the power of institutional rules, which drive organizations to adopt innovations to be "institutionally correct", while these same organizations act rationally to protect their operational continuity. This inherent tension between institutional legitimacy and functional effectiveness produces phenomena of "decoupled compliance". The significant conclusion is that open government reforms cannot be assessed solely at the level of adoption, but primarily at the level of implementation. And this level, to avoid remaining theoretical, must be identifiable based on measurable social impact and the Public Value it produces – a concept analyzed in detail in the following section.

2.4 Public Value Theory: A Framework for Assessing Substantive Openness

While Institutional Theory interprets the mechanisms that lead states to adopt "window-dressing" policies, as analyzed previously, an imperative need arises for a normative and evaluative framework capable of distinguishing substantive from performative open government actions. The answer to the question of how the success of an openness initiative is measured cannot be limited to recording administrative outputs – such as the number of datasets or the existence of digital platforms – but must extend to social impact and the strengthening of democratic processes. In this context, Public Value Theory emerges as the most appropriate methodological tool for assessing the gap between political promises and tangible results.

The concept of public value was introduced into administrative science in the 1990s as a response to the limitations of New Public Management (NPM), which focused unilaterally on economic efficiency. Moore (1995), in his foundational work *Creating Public Value*, argued that public organizations should not merely be efficient but should aim to create value for the public, comparable to "shareholder value" in the private sector. A central element of the theory is Moore's "strategic triangle", which posits three interrelated prerequisites for any successful public policy: it must produce something substantively valuable for the social whole, it must be politically and socially legitimated by securing

the support of the authorizing environment, and it must be administratively and operationally feasible (Moore, 1995).

This model shifts the focus from simple procedural compliance to the achievement of measurable social outcomes, providing a powerful counterweight to technocratic approaches. At the same time, Hood (1991) had already proposed three fundamental administrative values – efficiency, integrity and resilience – foreshadowing the need for a balance between economic effectiveness and democratic principles (Hood, 1991).

In contemporary literature, the concept has been enriched and is distinguished into two primary approaches, which are critical for the analysis of open government. On one hand, the "institutional approach" treats public value as a set of normative principles and standards – such as transparency, legality and service quality – that public organizations are obliged to uphold. Jørgensen and Bozeman (2007) mapped 72 such distinct values, categorizing them into thematic groups concerning the administration-citizen relationship. On the other hand, the "generative perspective" focuses on the dynamic creation of value through interactive processes, where value is not produced unilaterally by the state but is co-created through collaboration with civil society. Drawing on the work of Stoker (2006) and Bryson et al. (2014), this approach highlights the importance of networked governance, where public leaders manage resources from multiple sources and promote public dialogue to define common goals.

The connection between Open Government and Public Value is structural and bidirectional, as open government can be considered a means to achieve the former, but also an embodiment of many values within the spectrum of public value (Φύτρος, 2026). The principles of transparency, participation and accountability function as "levers" that activate different dimensions of public value. First, transparency is considered a prerequisite for building trust, as the disclosure of data and decisions reduces information deficits and suspicion. From the perspective of public value, institutional trust and integrity constitute fundamental social outcomes. Second, citizen participation imbues the concept of public value with a democratic quality. According to Rose et al. (2015), engagement is a central value position linked to the New Public Service and the legitimacy of decisions. When citizens participate actively, either by contributing ideas or collaborating in service delivery, greater value is produced because services respond better to actual needs and resources are utilized more efficiently (Rose et al., 2015). Third, open government fosters innovation, as through open data, the state does not function merely as a provider but as an orchestrator of innovation ecosystems, allowing for the development of new solutions by third parties that improve social welfare and generate economic value (Panagiotopoulos et al., 2019).

Consequently, an inherent alignment of values exists: open government enhances efficiency through digital tools, improves service quality through participatory design, and promotes democratic values through accountability. Indeed, within the e-government assessment framework of Twizeyimana and Andersson (2019), "open government capability" is explicitly recognized as one of the six main categories of public value, alongside improved administration and social well-being (Twizeyimana & Andersson, 2019). However, this relationship is not always linear. Tensions and trade-offs between values often arise. As Bertot and Jaeger (2008) point out regarding the "e-government paradox", the pursuit of excellent service and transparency may, in the short term, increase administrative costs or slow down decision-making processes, creating friction with the

value of economic efficiency (Bertot & Jaeger, 2008). Public value theory serves as a reminder that the ultimate goal is net collective value and the balance between these competing demands.

If open government is the means and public value is the intended outcome, then the absence of the latter constitutes the strongest evidence for the existence of Performative Open Government (Opengov Washing). Public value theory allows us to move beyond the assessment of "inputs" (such as the existence of laws or platforms) and focus on outcomes. In the case of decoupling, we frequently observe the phenomenon of formal openness, where tools are adopted but no substantive value is produced. A characteristic example from the Greek reality illustrates this dimension: when public consultations are conducted under suffocatingly tight deadlines and without clear rules for incorporating feedback (Σαραβάκος & Καρκατσούλης, 2024), the process can be considered performative and may erode citizen trust instead of strengthening it. In these cases, the action not only fails to produce value but can lead to value destruction, intensifying distrust and cynicism toward institutions.

Assessment, therefore, must be holistic and examine whether the prerequisites of Moore's strategic triangle are met: whether the policy creates value, whether it is legitimated, and whether it is operationally viable. For example, a technically sound open data platform (operational feasibility) that is nevertheless used by no one (lack of value production) or lacks political support (lack of legitimacy) constitutes a failure or a form of washing. The use of public value indicators that reflect actual changes – such as measuring trust before and after transparency interventions or citizen satisfaction with participatory processes – is essential for identifying substantive openness (Φύτρος, 2026).

In conclusion, the concept of Public Value functions as the "mirror" of Open Government. An openness policy is deemed authentic only when it can demonstrate the creation of measurable benefits for the public, whether through service improvement or the strengthening of democratic accountability. When openness mechanisms remain dormant, without transforming the state-citizen relationship and without generating trust, the existence of ceremonial conformity phenomena is documented. The coupling of these two concepts creates a virtuous cycle, where open government enriches public value and the focus on public value gives meaning to and orients open government toward substantive results, away from practices of window-dressing (Φύτρος, 2026).

2.5 Measuring Open Government: Indicators, Frameworks and Limits

The international discussion on open government is not limited to its conceptual clarification but has been accompanied by significant efforts toward measurement, comparative assessment and the gradual maturation of relevant policies. In the relevant literature, three basic families of approaches can be schematically distinguished. The first concerns maturity models, which attempt to capture sequential levels of open government development; a characteristic example is the model by Lee and Kwak (2012), which organizes the path toward open government into five levels, from initial prerequisites to extensive citizen engagement (Lee & Kwak, 2012).

The second involves benchmarking tools, which evaluate individual dimensions such as transparency, participation, access to information, or the existence of grievance mechanisms. Indicatively, the World Justice Project's Open Government Index measures

four basic dimensions – publicized laws and government data, the right to information, civic participation and complaint mechanisms – based on general population and expert questionnaires (World Justice Project, n.d.). The third family specifically concerns open government data frameworks, such as the OECD's OURdata Index, which focuses on the availability, accessibility and support for data reuse (OECD, 2023a), or subsequent extensions like OpenGovB, which attempt to link transparency with characteristics such as data availability, understandability and reusability (Milić et al., 2022).

These approaches have provided valuable tools for mapping the field, but they tend to measure primarily the existence, availability, or formal development of open government tools, rather than their institutional utilization. The OURdata Index, for example, assesses government efforts to design and implement open data policies, yet the OECD itself explicitly points out that the index does not measure the impact of open data, but rather the conditions that enable its availability and encourage its utilization (OECD, 2023a). Similarly, the Open Government Partnership (OGP) eligibility criteria evaluate a country's commitment to open government through four core metrics – fiscal transparency, access to information, asset disclosure of public officials and citizen engagement – as well as through a complementary values check (Open Government Partnership, 2025). These are critical dimensions, but their primary function is to certify minimum prerequisites rather than to diagnose whether the adoption of openness is substantive or primarily performative.

A second limitation concerns the fact that many existing measurement schemes depend either on secondary indicators or on the perceptions and empirical judgments of experts and citizens; while this may enhance comparability, it often distances the analysis from the detailed organizational and institutional reality of specific initiatives. The WJP Open Government Index, for instance, relies on a combination of general population surveys and expert questionnaires, which allows it to record experiences and perceptions of openness, but simultaneously places it primarily at the level of perceived performance rather than the internal functioning of specific reforms (World Justice Project, n.d.). Correspondingly, the study by the Organization of American States (OAS) on measuring open government in the Americas recognizes that the very concept of open government remains partially "fuzzy, vague and diffusive", noting the lack of an established international tool that adequately captures all three pillars of open government – transparency, participation, and collaboration (Chen et al., 2019). The same report highlights that concepts such as collaboration are particularly difficult to measure as an actual outcome and are often evaluated only through the institutional framework supposed to facilitate them (Chen et al., 2019).

Based on the above, it follows that the international literature has developed notable metrics for open government, but most of them primarily assess whether institutions, tools, processes, policies or data exist, as well as how open, available, or accessible they are. Much less importance has been placed on whether this openness acquires substantive institutional depth, administrative responsiveness, organizational integration, temporal continuity or measurable public impact. Even in more complex approaches, such as the extension of OpenGovB for transparency, the weight falls mainly on the quality, authenticity and reusability of data (Milić et al., 2022), rather than on the distinction between authentic and performative openness at the level of administrative practice.

This is where the present study finds its place. Its contribution lies not in proposing yet another general open government index or another country ranking tool, but in developing an interpretive and diagnostic framework capable of examining if and when openness functions primarily as a substantively institutional practice or, conversely, as a performative one. In this sense, the OpenGov Authenticity Framework (OAF) proposed by this study does not directly compete with existing benchmarking and maturity frameworks but attempts to fill a different gap: the systematic distinction between formal and substantive openness. It emphasizes dimensions that international metrics usually capture only indirectly or fragmentarily, such as administrative responsiveness, organizational integration, institutional continuity and the measurable impact of an open government institution, policy or action. For this reason, this study engages with international literature without identifying with it: it utilizes the knowledge produced regarding what is typically measured in open government but shifts the focus from the simple assessment of the existence or availability of tools to the evaluation of the authenticity of their function.

3. Methodology

3.1 Research Approach

The present study adopts a qualitative research approach, combining conceptual analysis and case studies, aiming not only to describe but also to interpret the mechanisms through which declared openness is decoupled from substantive institutional implementation. This choice is deemed appropriate, as the research objective concerns not only the formal existence of institutions, legislation or digital tools, but the mechanisms through which these appear as vehicles of open government without producing corresponding results in terms of transparency, accountability, participation or public value.

The conceptual dimension of the research is critical, because the term Opengov Washing is not treated as an established category in the literature, but as an analytical extension of the relevant discussion on pretextuality in the field of open government. For this reason, the study links the phenomenon to public value theory, institutional theory – specifically the logic of decoupling – as well as to the critique of technocratic and instrumental versions of digital governance. The qualitative approach thus allows for both conceptual clarification and the empirical investigation of different forms of the phenomenon.

The research is organized around multiple case studies, as the phenomenon does not appear in a single form, but through different mechanisms: performative transparency, compliance without implementation, participation without institutional response, data publication without substantive reuse, and digital infrastructures without duration or organizational integration. The study does not seek statistical generalization, but analytical generalization (Yin, 2018) – that is, the identification of mechanisms that can function as interpretive and diagnostic tools beyond the specific sample.

This methodological choice is also directly linked to the core research questions of the study. The first question, concerning how the phenomenon of Performative Open Government is manifested and what its basic typological forms are, is addressed through the conceptual analysis of the case studies (Chapter 4), which allow for the typological decomposition of the phenomenon into distinct forms. The second question, regarding the mechanisms of divergence between declared and substantive openness and their translation into authenticity assessment criteria, is answered through the comparative synthesis of the cases, the identification of recurring patterns and their conversion into diagnostic categories (Chapter 5). The third question, concerning institutional and political interventions to limit Opengov Washing and enhance public value, is addressed at a later stage (Chapter 6), through the synthesis of empirical and interpretive findings leading to the formulation of policy proposals.

The methodological strategy of this thesis unfolds through a sequence of interrelated stages, which are linked both to the individual chapters and to the three main research questions. This process is summarized in the following table, which presents the main steps of the research, their correspondence to the research questions, the relevant chapters of the thesis, and the methods employed at each stage.

Step	Description	Research question	Chapter	Method	Main outcome
1	Literature review and conceptual analysis	RQ1, RQ2	1–2	Literature review, conceptual analysis, theoretical synthesis	Conceptual grounding of the phenomenon and theoretical foundation
2	Identification and selection of case studies	RQ1, RQ2	3	Purposive case selection, definition of selection criteria	Construction of a sample of fifteen case studies
3	Case study analysis	RQ1, RQ2	4	Comparative multiple-case study analysis, document analysis, typological coding	Typology of the forms of OpenGov Washing
4	Synthesis and interpretive processing of findings	RQ2	5	Comparative synthesis, interpretive analysis, analytical generalization, development of an assessment framework	Mechanisms of the phenomenon, institutionalization gap, OpenGov Authenticity Framework
5	Conclusions and policy recommendations	RQ3	6	Interpretive assessment, formulation of policy recommendations and future research directions	Conclusions, institutional and policy recommendations, research implications

Table 1: Research pathway of the thesis and correspondence between research questions, chapters, and methods

As the table indicates, the research questions are not addressed in isolation but run across successive stages of the study. The first question is addressed primarily through the conceptual and typological mapping of the phenomenon, the second through the comparative synthesis of the cases and the interpretive analysis of its mechanisms, and the third through the final assessment of the findings and the formulation of policy recommendations.

Finally, the research is based on a combination of academic literature, institutional and legal documentation, official digital sources and selected publicly available secondary sources. Theoretical and conceptual positions are primarily supported by academic literature and official evidence, while non-academic sources are utilized in a supplementary role for the empirical documentation of specific cases.

3.2 Method

The primary method of this study is the comparative analysis of multiple case studies (multiple-case study design), in conjunction with systematic document analysis (Stake, 2013; Yin, 2018). This choice addresses the nature of the research question, as the objective is not to measure the extent of the phenomenon, but to understand the ways in which "openness" appears institutionally or technically without transforming into substantive practice. Each case is examined through a common analytical framework to ensure comparability across heterogeneous examples (Yin, 2018).

The analysis focuses, first, on the stated purpose of each initiative – what it promises in terms of transparency, participation, accountability or openness. Second, it examines its institutional or technical form. Third, it searches for empirical traces of actual operation, such as reusability potential, the existence of feedback mechanisms, organizational integration, operational duration and evidence of impact. In this way, it becomes possible to identify the divergence between formal compliance and substantive functioning.

The method can be described as the identification of discrepancies between promise, implementation and result. In certain cases, this logic functions as an analytical monitoring of the critical points where an initiative presents fractures: from enactment to application, from technical development to organizational integration, from participation to responsiveness, or from publication to the possibility of substantive oversight. Correspondingly, institutionalization gaps are used as a tool for reading the points where the official declaration of openness is not accompanied by verifiable accountability.

The analysis relies exclusively on publicly accessible material, ensuring that every interpretive conclusion refers to evidence that can be re-examined. Sources include legislative and regulatory texts, official websites and platforms, public registries, technical data specifications, judicial or administrative decisions and, where necessary, secondary analyses that contribute to the cross-referencing of each case. Thus, reliance on anecdotal claims is avoided, and the transparency of the interpretive process is enhanced.

Through comparative analysis, recurring mechanisms and patterns emerge, such as symbolic compliance, visibility without accountability, technical development without organizational integration, participation without responsiveness, and the fragility of the digital infrastructure lifecycle. The application of this analytical schema becomes evident in the different types of cases examined in the next chapter. In cases of participatory processes without documented integration of submitted comments into decision-making, the analysis focuses on the absence of response mechanisms and the decoupling between participation and institutional impact. In cases where an institution appears formally strong and regulatorily complete but fails to produce corresponding results in terms of enforcement and accountability, the investigation centers on the divergence between formal compliance and substantive effectiveness.

In this way, individual cases are not treated as self-contained descriptions but as analytical units through which the identification of broader mechanisms – such as institutional decoupling, symbolic compliance and the discrepancy between outputs and outcomes – becomes possible. This synthesis also informs the proposed OpenGov Authenticity Framework (OAF) for assessing the authenticity of open government actions.

3.3 Case Selection Process

The selection of cases does not follow a logic of random or statistical sampling, but rather a purposive and theoretically driven selection (purposive sampling), guided by the analytical utility of each case for investigating the phenomenon (Stake, 2013). The aim of the study is to select cases that allow for the clearest observation of different forms of performative openness within both the Greek and international environments.

There are three primary selection criteria. First, the institutional relevance of the case to the field of open government – meaning its clear connection to issues of transparency, participation, accountability, open data or digital public administration. Second, the availability of verifiable evidence, ensuring that the analysis is based on material that can be audited and cross-referenced. Third, representativeness regarding different types of pretextuality/washing, so that the overall study is not limited to a single version of the phenomenon but covers multiple mechanisms, such as data washing, institutional/compliance washing, participation washing, transparency washing and ghost platforms.

The inclusion of cases from both Greece and the international environment serves the comparative logic of the study. The Greek cases constitute the primary empirical field, as they are directly linked to the administrative and institutional framework on which the study focuses. The international cases contribute to the completeness of the analytical description of the phenomenon, helping to determine the extent to which certain mechanisms transcend national specificities and/or acquire distinct characteristics.

These cases cover diverse units of analysis, such as legislation, institutions, registries, consultation processes, data repositories and digital platforms. Despite their apparent heterogeneity, all cases are integrated into a common analytical question: whether and in what way an initiative presented as an open government action produces substantive public value or is limited to symbolic, technical or communicative compliance. Comparability, therefore, is not based on the similarity of the cases' external form, but on the common logic of their evaluation. In this sense, the selection of cases serves not only the empirical documentation of the phenomenon but also its typological decomposition into analytically distinct categories, which are systematically developed in Chapter 4.

Finally, the process of selecting the number of cases remains consciously limited to a sufficiently representative sample to highlight each individual manifestation of the phenomenon (Stake, 2013). The aim is not an exhaustive inventory of all possible examples, but the construction of an analytically adequate set of cases, capable of clearly demonstrating both the specific forms and the fundamental mechanisms of the phenomenon, subsequently proceeding to proposals for its mitigation.

4. Case Studies

4.1 Data Washing / Obfuscation: "Opaque Transparency"

Open data policies are not merely technical initiatives but governance tools aimed at enhancing accountability and creating public value. However, their implementation is often mediated by organizational motives and administrative constraints, leading to phenomena of "openwashing". As Heimstädt (2017) analyzes, organizations may formally adopt openness rules but apply them strategically through a process of "decoupling", so as to minimize exposure to external scrutiny while maintaining reputational benefits. In this context, openwashing does not consist of an absence of openness, but of specific mechanisms that prioritize visibility over usability.

The literature identifies five main distortion techniques:

1. **Selective Openness:** Refers to the strategic publication of datasets that entail low political or organizational risk, while access to data with higher accountability potential is restricted (OECD, 2020a; World Wide Web Foundation, 2016b). This practice allows organizations to demonstrate openness in quantitative terms without exposing sensitive governance processes to scrutiny.
2. **Technical Obstruction:** Where data is published in formats that formally meet disclosure requirements but significantly hinder reuse. Common examples include scanned PDFs, non-standardized spreadsheets, fragmented datasets, or the absence of metadata and API interfaces in general. While such forms may be legally "open", in practice they restrict automated analysis, large-scale comparison and data interoperability, thus reducing the practical value of transparency (Crusoe & Melin, 2018; Janssen et al., 2012).
3. **Context Stripping:** Involves the release of datasets without sufficient metadata, documentation or explanatory information. Without details regarding data provenance, update frequency, institutional responsibilities or methodological assumptions, external users face significant barriers to interpretation and reuse (Zuiderwijk et al., 2012). This practice shifts the burden of understanding onto the users, often favoring entities with high resources and/or expertise and undermining the inclusiveness of open data initiatives.
4. **Temporal Openwashing:** Concerns the fragmented or short-lived nature of openness efforts lacking institutional continuity. Datasets may be published as part of pilot projects or political announcements, only to remain obsolete, partially updated or abandoned over time. Thus, while openness is highlighted as a practice at a given moment, it is not institutionalized as a sustainable administrative practice (OECD, 2020a; World Wide Web Foundation, 2016b). This undermines the reliability of open data as governance infrastructure.
5. **Discursive Openwashing:** Where the focus shifts from substantive implementation toward communication strategies. Public entities may announce the creation of portals, strategies or action plans as official narratives of progress, while issues such as data quality, interoperability and actual reusability potential remain in the background (Brandusescu, 2016). At the same time, high rankings in digital maturity indices and assessments based on quantitative criteria may, unintentionally, reinforce this dynamic. Governments may focus on demonstrating compliance or progress toward visible benchmarks (e.g., functional portal features or policy checklists), even when the actual conditions of reuse at the level of data

provision – such as machine-readability and metadata adequacy – remain uneven (European Commission, 2025b).

The mechanisms described should not be construed as distinct, exhaustive or mutually exclusive categories. On the contrary, they constitute analytically differentiated dimensions through which the phenomenon of openwashing in open data initiatives can be investigated. In practice, these mechanisms often coexist and interact within the framework of the same policy, platform or institutional arrangement, reflecting the complex intertwining of governance motives, technical design choices and organizational capacities (Heimstädt, 2017; Janssen et al., 2012).

Consequently, the proposed typology does not seek a "one-to-one" correspondence between individual case studies – such as those that follow – and specific forms of openwashing. Its aim is to offer a structured analytical framework capable of highlighting recurring patterns across different empirical contexts. Thus, a single case may incorporate more than one mechanism, while different cases might highlight alternative configurations of "opaque transparency" practices.

By applying this analytical lens, the following case studies examine how open data policies are implemented within specific institutional frameworks, identifying phenomena of selective openness, technical obstruction and/or symbolic compliance. In this manner, the analysis contributes to a more grounded understanding of the conditions under which open data can -or cannot- fulfill its promises of transparency, accountability and public value creation. Furthermore, it is worth noting here that while this subsection focuses specifically on open data policies, the distortions described are not exhausted at the technical or informational level. In several cases, restrictions on reusability, interpretability and data continuity broader affect institutional transparency and accountability, foreshadowing forms of performative transparency examined in a subsequent subsection.

Case Study: The Diavgeia Program

The Diavgeia Program (Δι@ύγεια / Transparency Program) constitutes one of the first and most comprehensive transparency reforms in the Greek public sector. Introduced in 2010, it established the mandatory publication of administrative acts and decisions by public authorities as a legal prerequisite for their validity. Each published act is assigned a unique Online Publication Number (OPN or “ΑΔΑ” in greek), which allows for the citation, reference and ex-post verification of administrative decisions. For this reason, Diavgeia is frequently cited in analyses of public sector transparency reforms in Greece and can be considered an exemplary case of legally mandated transparency, offering a stable institutional basis for examining the relationship between formal transparency and substantive data reusability (Alexopoulos et al., 2013; OECD, 2022).

From a governance perspective, Diavgeia has significantly expanded public access to information regarding administrative activity, including decisions related to public spending, appointments and regulatory acts. Existing studies and evaluations generally recognize its contribution to increasing transparency and reducing selective publicity in public administration, particularly in a context long characterized by fragmented and uneven information practices (Alexopoulos et al., 2013; OECD, 2022). At the same time, when examined through the lens of open data, Diavgeia also demonstrates the limitations

of transparency initiatives that prioritize disclosure as an end in itself, rather than reusability and accessibility.

A defining characteristic of Diavgeia is its reliance on document publication, primarily in PDF format. While this approach satisfies the legal requirements of transparency, it simultaneously significantly restricts automated processing, large-scale analysis and interoperability between datasets. Research on Greek open government data sources, including Diavgeia, has shown that extracting structured information from published decisions often requires extensive post-processing, such as text mining, manual data cleaning and the reconstruction of implicit metadata (Alexopoulos et al., 2013). As a result, the technical design of the platform essentially shifts the burden of data transformation onto external users, limiting substantive reuse to actors with sufficient technical capacity and resources.

It is also important to note that the format and quality of published decisions are not centrally determined by the Diavgeia platform but depend largely on the respective public authority responsible for uploading each document. Public entities retain significant discretionary power as to whether decisions are published as scanned documents or digitally generated PDFs. Although Diavgeia technically rejects primary documents from which text cannot be extracted, it nevertheless allows the attachment of scanned or image-based PDF files as supplementary material at the discretion of the issuing authority. This discretion produces significant variance in readability and machine-processability across institutional bodies.

Beyond the presence of scanned documents, technical obstacles also arise from the internal encoding of many PDF files. A non-negligible subset of documents contains visually readable text that is not reliably machine-processable due to non-standard or legacy font encodings or invalid character mapping information that links visual symbols to standard text characters. Such documents may appear readable to human users but remain essentially opaque to keyword searching, text extraction or automated analysis. In this sense, Diavgeia does not enforce a uniform standard of openness but reflects the broader heterogeneity of the Greek public administration, particularly regarding digital maturity, administrative capacity and interpretations of publicity obligations. Thus, the platform functions as a mirror of institutional diversity, where differences in organizational practices translate directly into uneven data quality and reusability potential.

Generally, this document-centric approach reflects a familiar pattern in which transparency is implemented through formats optimized for human consumption rather than machine processing. Although Diavgeia provides open access to a vast corpus of administrative decisions, the absence of structured, machine-readable datasets limits its ability to function as an open data infrastructure in the strictest sense. From this perspective, technical design choices act as subtle tools of information control, maintaining formal openness while simultaneously restricting scalability.

The limitations of Diavgeia regarding structure, searchability and reusability have, over time, led to the emergence of civil society and private sector initiatives aimed at improving access to and interpretation of published decisions. Platforms such as "yperDiavgeia" and, more recently, "Diavgeia Infoset" attempt to address the shortcomings of the official platform by offering enhanced search functions, structured extraction of decision

metadata, and, in the latter case, AI-assisted exploration of the corpus of administrative acts. The existence of such complementary tools is analytically significant, as it signals an unfulfilled demand for structured access and effective reuse. These initiatives point to persistent gaps between official transparency and practical usability, where external actors seek to reconstruct analytical value that is not inherently supported by the official platform. Similar dynamics have been observed in other open data contexts, where third-party tools compensate for institutional constraints in data design and accessibility (Triantafyllou, 2023).

Beyond format-related limitations, Diavgeia also exhibits patterns of context stripping that further complicate substantive reuse. Administrative acts are typically published as standalone documents, with limited standardized metadata regarding the policy area, institutional role, or decision-making process. While the unique identifier (OPN/ΑΔΑ) enhances traceability, it does not in itself provide sufficient contextual information to support systematic aggregation or thematic analysis across institutional bodies or over time (Alexopoulos et al., 2013). Consequently, users seeking to analyze public spending patterns, procurement practices, or the trajectory of policy implementation are often required to reconstruct the context ex-post, frequently through labor-intensive manual or semi-automated processes. This undermines the platform's accessibility for non-expert users and reinforces asymmetries between institutional insiders and external stakeholders. The broader literature on open government data consistently emphasizes the importance of rich metadata, documentation and semantic consistency as prerequisites for substantive transparency (Janssen et al., 2012; Zuiderwijk et al., 2012) – prerequisites that continue to be met only partially in the case of Diavgeia.

Although Diavgeia has a legally complete scope of application, its practical openness is shaped by functional limits embedded in its design and daily use. The platform focuses primarily on the publication of finalized administrative acts, offering a limited view of preparatory stages, political justifications or implementation outcomes. This emphasis aligns with a compliance-based interpretation of transparency, which centers on procedural validity rather than substantive accountability or policy evaluation (OECD, 2022). From an open data perspective, this form of selective openness restricts the analytical potential of the published material. While Diavgeia allows for the verification of individual decisions, it provides limited support for the systematic assessment of policy coherence, effectiveness or distributive impacts. Transparency is therefore achieved primarily at the level of individual acts rather than as a comprehensive, data-driven representation of public governance.

Broader research analyses and critiques of Greece's open data ecosystem have pointed to a gradual erosion of open data practices, characterized by the removal of datasets, inconsistent update cycles, and a retreat from previously ambitious proposals for machine-readable and reusable public data (Triantafyllou, 2023). From this viewpoint, Diavgeia does not appear as an isolated case but as part of a broader pattern in which transparency obligations are maintained at a formal level, while continuous investment in data quality, interoperability and reusability remains uneven. This reinforces the distinction between disclosure-based transparency and data-driven accountability, highlighting the fragility of open data reforms in the absence of long-term institutional commitment.

Overall, these characteristics make Diavgeia a clear example of how legally robust transparency mechanisms can coexist with constrained open data practices. The program

demonstrates that mandatory disclosure, even when complete and enforceable, does not automatically translate into reusable or analytically powerful open data. Instead, technical formats, metadata practices, and institutional interpretations of openness play a decisive role in shaping the practical outcomes of transparency. Over time, Diavgeia has also acquired a strong symbolic role in transparency narratives (Deligiannis & Peristeras, 2025), where its existence is frequently cited as proof of openness, even when issues of reusability and analytical accessibility persist. As an institutional foundation, Diavgeia provides a valuable reference point for the case studies that follow. It demonstrates how long-term transparency reforms can stabilize specific forms of openness while simultaneously reproducing limitations that become more pronounced under conditions of higher analytical demand or time pressure. In this respect, Diavgeia offers a critical basis for comparing open data practices across different governance contexts, including crisis-driven data publication and evolving national or supranational data portals.

Case Study: The EU Open Data Portal

The EU Open Data Portal, now integrated into the consolidated data.europa.eu platform, represents one of the most advanced and institutionally mature open data infrastructures worldwide. Developed under the auspices of the European Commission, the portal aggregates datasets from member states, institutions, bodies and agencies of the European Union and is explicitly aligned with EU open data policies and legal frameworks. Consequently, it is frequently presented as a benchmark for standardized, fully policy-compliant openness at a supranational level (European Commission, 2020; OECD, 2020a). This is reinforced by the annual EU Open Data Maturity (ODM) assessment, produced within the framework of data.europa.eu, which explicitly evaluates portal capacity, metadata quality and the measurement of reuse and impact across all participating European countries (European Commission, 2025b).

From a governance perspective, the EU Open Data Portal reflects a deliberate shift from document-based publication toward dataset-based openness. It emphasizes machine-readable formats, common metadata schemas and harmonized licensing terms, aiming to facilitate reuse across national and sectoral boundaries. Unlike national transparency platforms such as Diavgeia, transparency in this case is driven less by legal validity requirements and more by policy objectives related to interoperability, innovation and data-driven decision-making (European Commission, 2020). At the same time, the analytical value of the EU Open Data Portal lies precisely in the tensions that emerge within this highly standardized and technically sophisticated environment.

A defining characteristic of the EU Open Data Portal is its strong emphasis on standardization. Common vocabularies, metadata profiles and technical specifications are employed to enable the reuse of datasets at both cross-sectoral and transnational levels. While this approach addresses many of the technical barriers observed in document-centric transparency systems, it also introduces new challenges related to usability and contextual understanding. An empirical evaluation of the datasets hosted on the European Data Portal shows that compliance with technical best practices does not necessarily extend to richer forms of documentation or contextual framing that would support interpretive reuse, particularly across different policy sectors (Andrade et al., 2021). The ODM 2025 report reaches a similar conclusion using automated metadata quality indicators derived from catalogs searchable through the European Data Portal: only about

one-third of the assessed distributions were classified as machine-readable (European Commission, 2025b). Furthermore, even when open licenses are consistently declared, the ODM report shows that many individual datasets still vary significantly in their technical quality and readiness for reuse (European Commission, 2025b).

Research on open government data at the supranational level has shown that high degrees of standardization do not automatically translate into substantive reuse by diverse user groups (OECD, 2020a; Zuiderwijk et al., 2012). Datasets published through the EU Open Data Portal often exhibit high levels of abstraction from their original policy contexts, in the sense that they are presented primarily through harmonized metadata structures designed for cross-catalog discovery rather than through rich documentation of the policy processes and conditions that generated them. Empirical assessments of datasets hosted on the European Data Portal indicate that while technical and metadata-related best practices are frequently examined, information related to interpretation, provenance and use remains heterogeneous or limited (Andrade et al., 2021).

More recent research on the evolution of data.europa.eu as a large-scale data aggregator further confirms that the portal's primary function lies in metadata harmonization and interoperability across data spaces, rather than in integrating policy narratives or decision-making contexts into the datasets themselves (Conde et al., 2024). The emphasis on discovery across intersecting catalogs is also institutionally evident in how member states describe their strategies: in the ODM 2025, most EU countries report that their policies include the discovery of national data through data.europa.eu, even when this is not always formally defined in strategy documents (European Commission, 2025b). As a result, users may gain access to technically well-structured datasets while lacking the contextual information required for critical interpretation and accountability-driven reuse.

In contrast to Diavgeia, where context is typically embedded -albeit indirectly- within administrative documents, the EU Open Data Portal presents a different form of context stripping. Datasets are often detached from the policy processes, regulatory debates or administrative workflows that generated them. Metadata descriptions frequently prioritize technical specifications and thematic categorization over explanatory narratives regarding institutional purpose or governance implications (European Commission, 2020). Correspondingly, the ODM 2025 notes extensive efforts to optimize discovery and provide metadata in "clear, simple language", while the assessment itself focuses primarily on technical and governance indicators – an emphasis that may leave deeper contextual documentation and interpretive narratives less visible in how portal quality is officially evaluated (European Commission, 2025b).

This abstraction is partly a consequence of scale. Aggregating data from multiple EU institutions requires a level of generalization that inevitably flattens institutional specificity. Recent work on the integration of European open data into data spaces highlights that data.europa.eu functions primarily as a metadata-driven aggregation layer, optimized for interoperability across institutional and thematic boundaries. While this architecture supports large-scale integration, it also reinforces the abstraction from the organizational and political contexts in which the data are produced (Conde et al., 2024). From an analytical perspective, this process can obscure the relationship between data and decision-making, limiting the portal's ability to support critical evaluation of EU governance beyond surface-level indicators.

Scholars have also noted that such forms of contextual erosion may inadvertently favor expert users who possess prior knowledge of EU policy processes, while simultaneously discouraging broader citizen or journalistic engagement (Janssen et al., 2012; Zuiderwijk et al., 2012). The findings of ODM 2025 also indicate that more advanced forms of automated access are not equally available across all countries. While all EU member states provide basic API access to portal metadata, fewer support more sophisticated query mechanisms designed for complex data integration, indicating a persistent gap between basic openness and the tools primarily useful for power users (European Commission, 2025b).

The EU Open Data Portal is part of a broader European Union narrative on digital transformation, innovation, and data-driven governance. Official communications frequently emphasize the number of available datasets, compliance with international open data standards, and the potential economic value of their reuse (European Commission, 2020). Through these references, the Union's institutional commitment to openness and modern governance is projected.

However, when the assessment of openness is limited primarily to formal indicators – such as the number of datasets or their licensing status – there is a risk of equating simple availability with actual impact. Evaluation studies point out that indicators focusing on performance may hide uneven levels of reuse and mask the gap between technical openness and substantive accountability (OECD, 2020a; World Wide Web Foundation, 2016b). The same issue emerges in user-centered research: academics and researchers report difficulties in understanding, providing an interpretive or methodological framework, and integrating data from data.europa.eu into their analytical processes, despite the high level of technical access (Publications Office of the European Union, 2024). In this context, the EU Open Data Portal serves as an example of discursive openness, where the success of a policy is presented mainly through standardized indicators, while issues such as interpretability, substantive relevance and democratic utilization of data receive less attention.

Examined in comparison with Diavgeia, the EU Open Data Portal highlights a different type of constraint in open data governance. While Diavgeia reflects limitations associated with document-oriented transparency and institutional heterogeneity, the European portal highlights challenges stemming from highly standardized, large-scale data infrastructures. In both cases, formal openness coexists with barriers to substantive reuse, albeit through different mechanisms. The comparison suggests that open data distortions are not limited to administratively weaker or less digitally mature environments. On the contrary, they can also arise in complex, politically driven systems that demonstrate a high level of technical compliance. This finding strengthens the analytical value of examining open data practices across different governance settings and sets the stage for the next analysis of pandemic-related open data as a test of resilience under conditions of urgency and critical political importance.

Case Study: Pandemic Open Data as an Openness "Stress Test"

The COVID-19 pandemic marked an unprecedented moment for open data initiatives worldwide. Governments and public authorities were compelled to publish large volumes of epidemiological and policy data under conditions of intense time pressure, scientific uncertainty and heightened public scrutiny. International organizations explicitly

recognized that timely access to data was crucial both for informed decision-making and for maintaining citizen trust. At the same time, they acknowledged that data quality, interoperability and adequate interpretation constituted persistent challenges (OECD, 2020b; World Health Organization, 2020).

The pandemic experience does not necessarily constitute a radical break from previous open data practices. Instead, it can be viewed as a "stress test" condition that highlighted and intensified existing tensions between data visibility, interpretability and the institutional control of its publication. As relevant studies point out, the crisis did not create new types of problems in data governance; rather, it made more apparent structural weaknesses that remain less visible under normal conditions (Leonelli, 2021).

A recurring feature of pandemic open data was the prioritization of a limited set of key indicators, such as confirmed cases, deaths, hospitalizations and vaccination rates. These indicators served as a central reference point for public information and the political justification of emergency measures. At the same time, international guidelines recognized that these indicators were shaped by shifting diagnostic testing strategies, variations in case definitions and differing recording and reporting practices. However, these methodological changes were not always communicated with the same clarity or consistency (World Health Organization, 2020). From an open data perspective, this situation led to a form of selective openness. Although core data were disclosed quickly and at scale, information regarding the context of their production – essential for interpretation, such as methodological assumptions, revisions and uncertainty levels – often remained fragmented or poorly documented. Policy analyses highlight that this imbalance limited the potential for independent oversight and comparative analysis, even in cases where data publication appeared extensive and timely (OECD, 2020b).

Online dashboards emerged as the dominant interface for disseminating pandemic data. Through graphs and maps, they translated complex information into easily digestible visual forms, facilitating public understanding. However, empirical evaluations show that dashboards often prioritized clarity and immediacy over transparency regarding data provenance, quality and interpretation (Ismail et al., 2022). This emphasis on visualization-focused openness introduced a form of context stripping. Users could easily observe trends and comparisons but often lacked access to raw data, detailed metadata, or systematic documentation of methodological changes. As a result, the analytical burden shifted to external actors – journalists, researchers and civil society organizations – who sought to reconstruct the lost context through independent data collection and processing (Ismail et al., 2022; Leonelli, 2021).

Despite frequent references to "open" and "data-driven" pandemic response policies, many available datasets were difficult to reuse systematically. Discrepancies in file formats, update cycles, indicator definitions and documentation levels limited cross-country comparisons and longitudinal data analysis. The creation of large-scale metadata during the pandemic demonstrates both the demand for reusable data and the gaps in existing publication practices (Wahlteiz et al., 2022). Wahlteiz et al., for example, describe the development of the COVID-19 Open Dataset as a response to the fragmentation of pandemic data across hundreds of different sources globally. While such initiatives enhanced analytical capabilities, their very necessity highlighted the issues of standardization, documentation and interoperability that characterized the primary data (Wahlteiz et al., 2022).

Similar dynamics were observed outside the European context. In the United States, for instance, the State of California faced public criticism in 2021 for withholding key COVID-19 metrics, despite official commitments to "maximum transparency". Although pandemic information was published via the state's open data portal, public officials acknowledged that decisions were made regarding which indicators to release, citing concerns over potential misinterpretations. Investigations by journalistic organizations showed that this selective publication restricted access for researchers and journalists to critical data needed to evaluate trends and the impact of policy measures (Thompson, 2021).

Such cases demonstrate a subtle but significant form of obfuscation, where data is officially released but strategically curated to minimize political or communication impact. Instead of enabling substantive scrutiny, openness in these contexts functions primarily as a mechanism of symbolic compliance, signaling adherence to transparency rules while maintaining control over what can actually be analyzed. Yu and Robinson (2012) describe this dynamic as part of the broader ambiguity of "open government", where the mere disclosure of data does not necessarily lead to accountability or democratic oversight. In the same vein, subsequent policy analyses have characterized such practices as forms of "discursive openness", emphasizing the role of data publication as a public communication tool during a crisis.

At the European level, transparency issues regarding pandemic data also emerged through institutional accountability mechanisms. In 2020, the European Ombudsman launched an inquiry into how the European Centre for Disease Prevention and Control (ECDC) collected and communicated data and scientific assessments related to COVID-19 (European Ombudsman, 2021a). In February 2021, the Ombudsman publicly called on the ECDC to enhance the transparency of its work, particularly regarding the communication of underlying data and the clarity of scientific documentation during the vaccine rollout period (European Ombudsman, 2021b). The ECDC responded by acknowledging the concerns expressed and outlining measures to strengthen transparency and communication practices (ECDC, 2021). This institutional exchange highlights that the tensions between rapid communication and the substantive opening of data were recognized even at the highest institutional level.

Overall, the pandemic experience highlights open data as a critical testing ground for the concept of openness. In comparison with the Diavgeia program and the EU Open Data Portal, pandemic data exhibit similar patterns: selective disclosure, loss of necessary context, technical barriers to reuse and an emphasis on discursive openness. The difference lies in the fact that all these manifested under conditions of emergency and high political pressure. What distinguishes this case is not the nature of these distortions, but their consequences. Data-driven policy documentation was directly linked to extensive public health measures, making limitations in interpretability and accountability both more visible and more decisive. For this reason, pandemic data function as a significant bridge between routine open data governance and broader issues of open government, transparency and democratic accountability.

4.2 Institutional / Compliance Washing: The Institutional Facade

The category of Institutional (or Compliance) Washing, otherwise "institutional facade", refers to the practice in which public entities symbolically adopt new institutions, pass laws or introduce new policies to satisfy international governance standards and external legitimating pressures emanating from supranational organizations, international fora, or global policy networks, eg. the European Union or the OECD (DiMaggio & Powell, 1983). This phenomenon becomes problematic when these new structures are not supported by the necessary resources, substantive powers, or political backing to function effectively, leading to what Meyer and Rowan (1977) described as "ceremonial conformity".

Here, we encounter the classic case of "decoupling", where political rhetoric and institutional appearance diverge from internal administrative practice (Heimstädt, 2017): the "front stage" presents a robust legal skeleton that satisfies external observers, while in the "back stage" institutions remain dormant, shielding established administrative practices from substantive scrutiny. In such cases, the institution functions as an "empty shell" or as a mechanism of "opaque transparency" (J. Fox, 2007), offering institutional legitimacy and formal compliance without ensuring substantive accountability or the production of public value. This phenomenon can be better understood through characteristic case studies, such as those that follow.

Case Study: The Transparency Register (Lobbying) in Greece

The case of the institutionalization and implementation of the lobbying framework in Greece serves as a hallmark example of "institutional washing", as it combines the existence of a regulatory framework and a digital platform with a lack of substantive function and public value creation. Conceptually, lobbying is defined as "oral or written communication between a lobbyist and a public official to influence legislation, policy, or administrative decisions" (OECD, 2021: p. 18) and is associated with the activities of interest representatives (lobbyists). In modern representative democracies, exercising influence toward the government and the legislative branch is an integral part of the public policy-making process. The existence of a transparency mechanism for lobbying, such as interest representative registers, is critical to making visible which actors seek to influence which decisions and by what means. Through this transparency, it is possible to ensure accountability, limit asymmetric access relationships, and enhance citizen trust in the decision-making process.

At the international level, the OECD recognizes as lobbyists both external consultants and in-house public affairs officers – staff members working within companies or organizations to exert pressure on behalf of their employer. However, Greek legislation adopts a narrower definition, primarily covering external interest representatives. This excludes a significant portion of actual influence exerted through in-house corporate executives and professional associations, creating a substantial regulatory deficit from the outset. Specifically, Law 4829/2021 was enacted to enhance transparency and accountability, providing for the creation of the "Transparency Register" within the National Transparency Authority (NTA) and mandating the registration and declaration of activities by interest representatives and institutional bodies. While the passing of the law was presented as alignment with European and international standards, its

implementation reveals strong characteristics of institutional decoupling, as four years after its adoption, Register data demonstrate severe under-functioning.

According to the Vouliwatch 2024 annual report (July 2025), only 318 institutional bodies have registered. Of these, 86 belong to Local Government, despite estimates that Municipalities and Regions include at least 1,500 obligated persons. Furthermore, only 16 out of 300 MPs appear in the register (Vouliwatch, 2025). Compliance among registered interest representatives is correspondingly low: ten failed to submit an annual declaration despite the legal obligation to submit even if there is zero activity. Even more telling is that for the entire year of 2024, a mere twelve (12) contacts between institutional bodies and lobbyists were declared. Only thirteen (13) institutional bodies reported holding meetings – a rate of 4.1% (13/318) – rendering the Register practically inactive (Vouliwatch, 2025). Additionally, the distribution of declarations shows that substantive use of the Register is limited to a tiny number of actors: a single lobbying firm (Effectus) declared nine of the twelve recorded contacts. A discrepancy was also identified between the declarations of a lobbyist and a Minister in one instance, highlighting the lack of data cross-referencing by the supervisory authority (Vouliwatch, 2025).

Alongside the under-functioning of the mechanism, a second, equally important dimension of institutional washing is observed regarding the strategic use of the regulatory framework within international evaluations. Lobbying was included as a commitment in Greece's 5th National Action Plan for Open Government Partnership (OGP) 2022-2024, yet without providing for any new policies or actions beyond the implementation of the already enacted law – a point previously highlighted in a joint letter from the Open Technologies Alliance (GFOSS) and Vouliwatch to the Ministry of Digital Governance (Vouliwatch & ΕΕΛΛΑΚ, 2022). The independent evaluation of the 5th National Action Plan via the Independent Reporting Mechanism (IRM) recognized that the lobbying commitment was characterized by formal compliance but low substantive co-creation and a lack of transformative result (OGP IRM, 2023).

This evaluation records concerns from civil society organizations, such as Vouliwatch and Transparency International Greece, regarding the limited diffusion of the regulation and the deficient operation of the Register. As the IRM notes, civil society organizations "expressed concern that the government had not yet conducted an information campaign regarding the obligation to register", pointing out that from the start of the Register's operation in December 2022 "until March 2023, only two lobbyists had registered" and that "their data were incomplete, unverified, and seemingly inaccurate" (OGP IRM, 2023: p. 6). The same section of the evaluation records further criticism regarding the platform's quality and interoperability, stating that civil society requests improved search functionality – specifically noting that one can only perform a search if they know the exact name of the lobbyist – and the release of data in an open data format to enable public accountability (OGP IRM, 2023).

Finally, structural weaknesses of the law itself are highlighted, as it "excludes in-house lobbyists", "does not provide a clear timeline for registration" and "requires annual activity submissions, allowing the publication of meetings to occur long after they have taken place" (OGP IRM, 2023: p. 6). This delayed disclosure of meetings, often months after the fact, renders the provided information politically useless, as the relevant legislative or administrative decisions have usually already been made and implemented. In this way, transparency is transformed from an active tool of democratic oversight into

an inert historical archive, allowing the institution to operate in a state of formal compliance while its substantive power has, in practice, been neutralized.

These observations, combined with the absence of new reform commitments within the OGP framework, directly align with what Lee-Geiller and Ali (2025) describe as "recurrent liberalism": a government or public authority presenting already-taken decisions or pre-existing policies as new reforms, aimed at boosting its international image of compliance (Lee-Geiller & Ali, 2025) without a corresponding production of public value. In this context, "recurrent liberalism" is not identical to policy simulation or a simple communicative façade; it has a more structural character. It recycles pre-existing policy processes, re-introduces them as reforms and channels them into frameworks like the OGP to produce output legitimacy without any real change in existing procedures and practices of influence and decision-making. In the case of Greece, the institutionalization of lobbying was used to strengthen an image of compatibility with OECD and OGP standards, but the functional implementation of the transparency mechanism remains extremely limited. Of course, this phenomenon is not purely Greek but global, as reflected in the findings of the Global Data Barometer, according to which political integrity data is one of the most deficient fields internationally, with Europe receiving low scores regarding the complete and reliable publication of lobbying data (Global Data Barometer, 2022).

The above constitutes a typical form of institutional washing, where the "front stage" of the institution includes a modern law, a code of ethics and a digital platform that ensure positive evaluations and international compliance (promising). Meanwhile, the "back stage" (performing) captures a practically unenforceable policy, limited compliance by obligated parties, deficient supervision, a lack of quality data and the failure to achieve transparency and accountability goals. The institutional decoupling between law and implementation, combined with the recycling of the regulation within the OGP framework, forms a complex case where lobbying functions not only as a field of inadequate regulation but also as an example of compliance without substance. This reinforces indices and international image without producing public value in terms of transparency, equality of access to decision-making and the control of conflicts of interest.

Case study: Whistleblowers Law

The case of Law 4990/2022 regarding whistleblowers is another hallmark example of "institutional washing" in the Greek legal order. At its core is the institution of the whistleblower – a person who, due to their position in a public or private organization, gains access to serious violations and decides to disclose them in the public interest. International literature emphasizes that public interest informants are critical for uncovering acts of corruption, fraud or other serious violations that are often carried out in secret and are difficult to reveal without internal testimony (Terracol, 2023; Καπαγκούνης, 2023). For this reason, EU Directive 2019/1937 on the protection of persons who report breaches of Union law adopts a relatively broad functional definition of a whistleblower, covering employees, former employees, applicants, self-employed persons, contractors, volunteers, members of administrative bodies etc. It recognizes that their protection is a necessary tool for the "effective and uniform application of Union law" and the defense of the public interest (Καπαγκούνης, 2023).

The regulatory framework at the EU level sets a mandatory minimum threshold of protection that member states must incorporate into their national law, while simultaneously allowing the discretion to extend protection to violations that do not directly touch upon Union law – such as broader forms of corruption or behavior harmful to the public interest (see EU Directive 2019/1937, Articles 1-2 & 25, Recitals 5 & 104). Empirical assessment by Transparency International, examining the transposition laws of the Directive in 20 member states, shows that none of them fully utilized all possibilities for higher protection standards, while the majority limited themselves to a "minimum" level of compliance (Terracol, 2023).

Greece is among those countries that moved conspicuously toward "minimalist transposition". Law 4990/2022 incorporated the Directive almost verbatim regarding its substantive scope of application: according to Article 4, protection covers only violations in areas of EU competence, such as public procurement, financial services, anti-money laundering, environmental and public health protection, personal data protection, network and information security, and breaches affecting the Union's financial interests or competition and corporate tax rules (Καραγκούνης, 2023). An analysis from an international practical guide on internal investigations in the EU confirms that the material scope of the Greek law is identical to that of Article 2(1) of the Directive (Namias & Petropoulos, 2024). This means that reports concerning violations of purely national law (e.g., theft, embezzlement, or a series of corruption offenses that do not fall within EU functional areas) are not protected under Law 4990/2022 (Namias & Petropoulos, 2024).

This choice, often described as "minimum possible compliance", carries significant consequences. A public official who reports a case of corruption or abuse of power that is not linked to a specific sector of EU law does not, in principle, fall within the protective scope of Law 4990/2022, even if the report concerns serious harm to the public interest. This approach is further corroborated by the Liberties network report on the rule of law in Greece, which notes a "partial transposition" of the Directive. It highlights that, contrary to the explicit reference in Recital 42 regarding the need to cover "abusive practices", Article 4 of Law 4990/2022 does not explicitly incorporate this term into the definition of "violation" (Takou, 2024: pp. 15–16). Combined with Transparency International's observation that the whistleblowing framework in Greece is characterized by a narrow scope that significantly limits its effectiveness (Terracol, 2023), the resulting picture is that of a piece of legislation designed to satisfy the formal obligation of transposition while maintaining a limited functional reach.

The "institutional facade" becomes even more apparent when examining the procedural mechanisms and the entities tasked with implementing the law. Law 4990/2022 adopts the Directive's three-tier reporting model (internal channel, external report to a competent authority, public disclosure), giving clear priority to internal reporting and setting strict prerequisites for lawful public disclosure – such as prior recourse to an internal or external channel, or the existence of an imminent danger to the public interest or a high risk of retaliation (Καραγκούνης, 2023). It is highlighted that while the law adopts a broad definition of persons eligible for protection (employees, former employees, self-employed persons, suppliers etc.), it simultaneously ties that protection to the formal inclusion of the reported violation within the scope of Article 4 (Broumas, 2022), which excludes a wide range of domestic corruption cases.

At the institutional level, the National Transparency Authority (NTA) is designated as the central external reporting channel and supervisory mechanism (Law 4990/2022, Article 11). However, its very institutional standing has been the subject of intense criticism. The Liberties Rule of Law Report points out that the NTA is not explicitly safeguarded by the Constitution, meaning it does not enjoy the enhanced guarantees of Article 101A provided for independent authorities. The appointments to the Authority's leadership are made by a simple majority in the competent parliamentary committee following a proposal by the Cabinet. This allows a single-party government to de facto control the composition of the leadership and "raises risks of the NTA's political dependence on the government" (Takou, 2024: p. 15). Within this context, assigning the NTA the role of the external channel for whistleblowers creates reasonable concerns regarding the independence and credibility of the reporting system, particularly when complaints are directed against government bodies or large state entities.

At the same time, the practical application of the law remains uncertain. Specialized analyses regarding the operational transposition of Law 4990/2022 note that while the institutional framework for internal and external channels, confidentiality, and the prohibition of retaliation is generally aligned with the Directive's standards, they highlight significant implementation lags: insufficient organizational awareness, delays in issuing regulatory acts regarding fines and the functional operation of channels, as well as an absence of established case law on critical issues such as the reversal of the burden of proof in cases of retaliation (Sabeti, 2025). The same sources underscore that despite theoretically robust provisions for prohibiting retaliation and fines of up to €500,000 for serious violations, the lack of enforcement and intense social suspicion toward whistleblowing as "uncollegial behavior" in practice undermine recourse to reporting channels (Sabeti, 2025). This picture is further reinforced by the slow integration of even basic organizational requirements: two years after the law was passed, only 72 decisions appointing staff members responsible for handling reports had been published (Vouliwatch, 2024), demonstrating that the formal existence of the institutional framework was not accompanied by corresponding administrative adjustments and implementation mechanisms.

Overall, this blend – minimal substantive scope, limited integration of critical concepts such as "abusive practices", questioned independence of the central external channel (NTA) and slow, hesitant implementation – composes the image of an institution that is robust "on paper" but eviscerated in practice. From the perspective of the "institutional facade", Law 4990/2022 allows the Greek state to declare compliance with European mandates, participate in international anti-corruption assessments and cite the existence of a "modern" whistleblower protection framework. Simultaneously, a large portion of actual risks – especially classic cases of national political and administrative corruption – remains outside the core of protection, while the institutional weaknesses of the NTA and practical implementation difficulties act as deterrents for potential whistleblowers (Sabeti, 2025; Takou, 2024). Thus, the institution risks functioning as yet another "empty shell" of transparency: a mechanism that, on the front stage, displays modernization and compliance with European standards, but behind the scenes fails to substantively alter the incentives, expectations and accountability structures surrounding corruption and violations of the public interest.

Case Study: The Irish Data Protection Commission (DPC)

The implementation of the General Data Protection Regulation (GDPR) in the European Union relies on a complex institutional framework of decentralized oversight. Under the "One-Stop-Shop" mechanism, the competent supervisory authority of the member state hosting a company's "main establishment" acts as the Lead Supervisory Authority. The Irish Data Protection Commission (DPC) sits at the heart of this arrangement, as Ireland hosts the European headquarters of numerous multinational technology firms whose business models rely on the mass processing of personal data (e.g. Meta, Google, Microsoft). Theoretically, this model prevents the fragmentation of regulatory power and ensures a uniform interpretation of EU rules. In practice, however, it has created a situation where a single member state acts as the *de facto* "regulator of Europe" in one of the digital economy's most critical sectors, embodying a series of institutional, economic and political contradictions.

Specifically, the DPC has been repeatedly accused of strategic under-enforcement of the GDPR, despite its formal regulatory role. In an extensive report, the Irish Council for Civil Liberties (ICCL) described the situation as "Europe's enforcement paralysis", noting that 98% of major cross-border cases assigned to the DPC by 2021 had not reached a final decision (Ryan, 2021). The same report states that between 2018 and 2021, the DPC had submitted only four (4) draft decisions to the European Data Protection Board (EDPB), creating a "regulatory bottleneck" that stalled the functional application of the GDPR at a pan-European level. This criticism did not originate solely from organizations like the ICCL and noyb, but also from broader alliances of civil society organizations, which have highlighted significant delays, procedural obstacles and the need for structural reforms – including the strengthening of the European enforcement mechanism and the revision of cross-border procedures (European Digital Rights et al., 2022).

The situation described above offers another characteristic example of institutional or compliance washing: an institution with strong formal authority and European legitimacy that fails to substantively fulfill its regulatory mission, producing what Fox (2007) has described as a mechanism of "opaque transparency". The DPC embodies this phenomenon, as the existence of a seemingly rigorous institutional framework (GDPR) and a lead supervisory authority (DPC) projects an image of functional oversight and rights protection, while substantive enforcement in practice remains unachieved. The distance between the "front stage" (a robust regulatory framework that satisfies European institutions and international public opinion) and the "back stage" (systemic delay and under-enforcement) can be considered a case of "decoupling" as defined by Meyer and Rowan (1977).

The root cause of under-enforcement is often attributed to Ireland's unique position as a member state attempting to balance its obligation to enforce the GDPR with the strategic economic importance of Big Tech to the domestic economy. For decades, Ireland has built its economic model on attracting foreign direct investment through favorable taxation, a flexible regulatory environment and a skilled workforce. The presence of Meta, Google, Apple, Microsoft and other tech giants is a critical source of employment and tax revenue, resulting in a strong economic incentive to avoid an overly "hostile" regulatory environment (Simmons & Simmons, 2021). Within this context, the DPC faces a structural conflict of interest: strict GDPR enforcement may threaten core national economic goals, while delayed or lenient penalties keep Ireland attractive to the Big Tech

ecosystem. International literature describes such phenomena as a form of "regulatory capture", where the regulatory body becomes functionally aligned with the interests of the regulated entities, thereby limiting its substantive independence (Carpenter & Moss, 2014).

Beyond economic incentives, the DPC has also been accused of an administrative culture oriented toward conflict avoidance, favoring "amicable resolution" processes over the immediate imposition of sanctions. Specifically, analyses note that the DPC makes extensive use of amicable resolution procedures and prolonged correspondence to resolve complaints, often limiting the process to observations or informal suggestions rather than full enforcement decisions – a fact that reinforces the criticism of GDPR under-enforcement (Moody, 2023). Such an approach not only delays the remediation of potential violations but also creates strong negative incentives: companies understand that non-compliance carries no immediate cost, while citizens find that filing a complaint does not lead to substantive redress.

Criticism of the DPC has extended in recent years to the level of European institutions. The European Data Protection Board (EDPB), which functions as a unified body for coordination and dispute resolution among national data protection authorities, has repeatedly intervened to modify or tighten DPC decisions. In certain cases (e.g. Meta Ireland), the EDPB's binding decisions under Article 65 of the GDPR led to the amendment and strengthening of the measures initially proposed by the DPC. These amendments included changes regarding the legal basis for processing and the imposition of stricter corrective measures and administrative fines (Bryant, 2023; EDPB, 2023). This highlights that the practical application of the GDPR does not depend solely on the DPC's recommendations but is shaped through a multi-level European mechanism of coordination and binding decisions. Furthermore, the Court of Justice of the European Union dismissed an appeal by the DPC challenging the EDPB's authority to request an extension of investigations in certain cases, thereby institutionally strengthening the EDPB's role as a mechanism for ensuring the substantive application of the Regulation (noyb, 2025). The fact that the Irish supervisory authority took legal action against the European oversight body, rather than adopting a stricter stance, reflects the tension that has developed between formal compliance and substantive regulatory action.

At the civil society level, the DPC has been the subject of intense and systemic criticism. Organizations such as the ICCL, Privacy International, the European Consumer Organisation (BEUC) and noyb have publicly denounced the DPC's tendency to restrict stakeholders' access to critical information, classify cases as "confidential", or exclude non-governmental entities from crucial stages of the process (noyb, 2023; Ryan, 2021). Noyb went as far as to describe the DPC's GDPR management process as "procedurally opaque and dysfunctional", noting that cases often turn into multi-year procedures without clear timelines or visible outcomes (noyb, 2023). Such practices reinforce the phenomenon of opaque transparency (J. Fox, 2007), where the existence of a formally transparent procedural framework does not lead to genuine accountability.

The case of the DPC illuminates several theoretical dimensions of institutional washing. First, it serves as an example of "ceremonial conformity", where Ireland institutionally complied with European requirements by establishing a supervisory authority with clear mandates, yet without creating the substantive conditions necessary for its effective operation. Second, it constitutes a form of "decoupling", where the existence of a robust

regulatory framework (GDPR) diverges from its weak application, thereby shielding existing economic and administrative practices from meaningful reform. Third, it reflects a strategy of "selective under-enforcement", wherein the DPC applies enforcement in a manner that favors specific economic sectors, leading to a functional weakening of citizens' rights. This structural asymmetry between formal and substantive compliance places the DPC within the broader conceptual framework of compliance washing, where the existence of institutions and rules functions more as a mechanism for legitimacy than as a tool for generating public value.

In conclusion, the Irish DPC represents one of the most characteristic examples of international institutional facade. A regulatory body that is formally powerful, internationally prominent and central to the implementation of the GDPR fails to exercise its substantive role, transforming one of the world's most ambitious data protection regulations into a system of unequal enforcement and limited accountability. The fact that the European Commission is now considering institutional reforms to rectify the One-Stop-Shop mechanism and strengthen the EDPB (Mildebrath, 2024) is the strongest indication that the problem is not merely theoretical but functional and structural, with implications for the entire European legal order. Within the context of institutional washing, the DPC case reveals how bureaucratic compliance and regulatory formalism can substitute for the substantive protection of rights, creating a regime where rhetoric prevails over practice and regulatory symbolism replaces effective regulation.

4.3 Participation Washing: Consultation without Listening Mechanisms

Participation constitutes a fundamental pillar of Open Government, alongside transparency and accountability. However, the mere existence of participatory processes does not automatically entail substantive citizen influence over decision-making. Arnstein's (1969) classic "Ladder of Citizen Participation" distinguishes between forms of authentic participation, where real power is delegated to citizens, and forms of tokenism, where consultation is limited to the expression of opinions with little to no impact on the final decision (Arnstein, 1969). At the lower levels of this scale, participation functions primarily as a mechanism for legitimizing pre-determined decisions.

Similarly, Fung (2006), in analyzing participation factors within complex governance systems, proposes that participatory processes differ essentially across three dimensions: who participates, how they deliberate, and (crucially) what scope of authority is institutionally linked to the process. The dimension of authority concerns whether participation is merely advisory or linked to a genuine ability to influence the final decision, resource allocation or policy formulation (Fung, 2006). When citizen feedback is not integrated into a binding decision-making mechanism, participation remains procedural rather than substantive.

Within this context, the term Participation Washing refers to consultation processes that formally allow for the submission of comments or evaluations but lack institutional mechanisms for listening, processing and/or integrating that feedback. This represents a form of institutional decoupling (Meyer & Rowan, 1977), where participation is adopted as a regulatory imperative without a corresponding organizational adjustment. "Consultation without listening" consists precisely of this dimension: the collection of

input exists formally, yet it is not accompanied by a clear process of feedback, justification, or any alteration of the final outcome. The following sections examine three cases where the divergence between formal participation and substantive influence becomes evident.

Case Study: "No Listening" in Public Consultation – The Case of the Waste Management Bill

The public consultation for the draft law on waste management, posted on the OpenGov platform in June 2021 by the Ministry of Environment and Energy, offers a characteristic example of the divergence between the formal opportunity for participation and the substantive influence of citizens on the decision-making process. This procedure constitutes a telling case where participation appears institutionally organized, yet the practical application of the rules ensuring the link between participation and the final decision remains questionable. In the terms of this analysis, it is a case where participation risks functioning as a procedural output without a demonstrated impact on the final regulatory outcome.

Public consultation in Greece is an institutionally established stage of the legislative process. Law 4048/2012 on regulatory governance mandates that proposed regulations must be submitted to public consultation to ensure the timely information and participation of citizens and stakeholders (Law 4048/2012, Article 6). Within this framework, the process may be conducted through the electronic platform OpenGov.gr and is accompanied by specific quality guarantees. These include the provision of adequate time for participation (at least two weeks), the publication of the draft provisions and the obligation to compile a public consultation report. This report must present the comments submitted and provide a documented justification for their inclusion -or exclusion- from the final provisions (Law 4048/2012, Article 6, par. 4).

The institutional framework was further strengthened by Law 4622/2019 on the "Executive State", which stipulates that public consultation on draft bills generally lasts two weeks and is conducted through the OpenGov.gr platform, allowing for article-by-article commentary (Law 4622/2019, Article 61). The same law permits the shortening of the process to one week only in exceptional cases and following adequate justification, which must be cited in the public consultation report accompanying the regulation. These provisions establish a clear regulatory standard for participation in the legislative process, based on three main pillars: adequate time for participation, sufficient information for participants and the obligation for public feedback regarding the fate of the comments.

The application of this institutional standard can be examined in the case of the draft law "Integrated Framework for Waste Management – Transposition of Directives 2018/851 and 2018/852". This bill held significant regulatory weight, as it concerned the adaptation of Greek legislation to the European circular economy framework, the reform of the recycling system and the operation of the Hellenic Recycling Organization. Public consultation on the updated draft law was posted on the OpenGov.gr platform on June 3, 2021, and concluded on June 10, 2021 (OpenGov.gr, 2021). The process was characterized by the Ministry itself as a "supplementary public consultation", since a legislative initiative on the same subject had preceded it six months earlier. It is noted, however, that there were substantial differences between the two draft laws, such as the greater volume of the latter, which contained provisions that did not exist in the previous

version – and consequently had not been submitted to the corresponding consultation (OpenGov.gr, 2021).

Despite the significance of the subject, the volume of the new draft law (102 articles) and the substantial differences from the previous version, the duration of the "supplementary" consultation was limited to approximately one week. This practice corresponds to the minimum allowable time limit provided by the current institutional framework and is permitted only in cases of an adequately justified exception (Law 4622/2019, Article 61). The shortening of the process is particularly significant for the quality of participation, as limited time hinders the ability of stakeholders and citizens to study a complex legislative text and formulate reasoned proposals. However, the conclusion of the consultation in question was not accompanied by the "adequate justification" mandated by Law 4622/2019. This deficiency is part of a broader pattern recorded in other analyses of the Greek legislative process, according to which the duration of public consultations often falls short of the time limits prescribed by the institutional framework (Σαραβάκος & Καρκατσούλης, 2024).

The dimension of feedback is equally critical for evaluating the substantiveness of participation. The obligation to draft and publish a public consultation report aims to make the relationship between submitted comments and the changes made to the final legislative text auditable. When this feedback is absent or remains limited, the actual impact of participation on decision-making becomes difficult to assess. At a broader empirical level, studies and reports on the functioning of public consultation in Greece highlight that, despite a significant increase in the number of legislative acts formally submitted for consultation, discrepancies persist regarding critical parameters of the process. In the European Commission's annual Rule of Law report, it is noted that despite the institutionalization of public consultation procedures under the "Better Regulation" policy, concerns continue to be raised regarding the adequate and timely participation of stakeholders in the law-making process – particularly concerning the time provided for public consultation and the participants' ability to contribute meaningfully (European Commission, 2024). According to a similar report by the European Network of National Human Rights Institutions (ENNHRI), although draft laws are now systematically submitted for public consultation, civil society organizations continue to point out problems regarding effectiveness and timely stakeholder participation, as well as the practice of introducing significant amendments at later stages of the legislative process (Greek National Commission for Human Rights (GNCHR), 2024).

An analysis by the Center for Liberal Studies (KEFiM) covering the decade 2014-2024 records that a significant percentage of legal articles are ultimately not submitted for consultation, while the average duration of the processes often remains shorter than the time limits prescribed by legislation (Σαραβάκος & Καρκατσούλης, 2024). Correspondingly, in the environmental sector specifically, research by the organizations The Green Tank and iSea finds that many public consultations via the OpenGov platform are conducted over short periods and are frequently not accompanied by the publication of comprehensive feedback reports (The Green Tank, 2024). Notably, in their report titled "12 years of public environmental consultations via OpenGov: Citizen participation and youth opinion", they identified only 25 consultation reports out of a total of 296 environmental laws submitted for consultation; thus, only 8.4% of the relevant consultations were accompanied by the -legally mandatory- report (The Green Tank, 2024).

From this perspective, the consultation for the waste management bill (now Law 4819/2021) – although accompanied by a relevant consultation report – can be interpreted as a characteristic manifestation of participation washing, as the conditions under which it was conducted weaken the link between participation and actual influence. It is also worth noting that this dynamic is not limited to the legislative process but appears even in initiatives explicitly aimed at strengthening open governance. A case in point is the public consultation for Greece's National Action Plan within the framework of the Open Government Partnership (OGP) for the period 2019–2022 (OpenGov.gr, 2019). The relevant consultation on the OpenGov.gr platform lasted seven days and gathered only four comments. According to the evaluation by the OGP's Independent Reporting Mechanism (IRM), no report was published showing how these comments were evaluated or integrated into the final action plan (OGP IRM, 2021). This case highlights a striking contradiction: even processes designed to promote participatory governance can reproduce practices of limited institutional listening.

This dynamic is critical from the perspective of public value. When participation is not linked to mechanisms that allow for the genuine integration of citizen feedback, the expected benefits of participatory governance fail to materialize. Participation does not produce measurable policy outcomes, it does not substantively enhance trust in institutions, and it does not demonstrably alter public policy. In such cases, participation remains primarily at the level of procedural activity, failing to transform into a tangible result. The critical issue, therefore, is not merely the existence of public consultation, but the existence of actual "listening". The concept of "no listening" describes a situation where citizens are invited to participate by submitting their views, yet no clear or auditable feedback is provided regarding how these views influenced the final decision. In this scenario, participation functions primarily as a procedural step to legitimize the political process, rather than as a substantive mechanism for policy co-creation.

Case Study: Citizen Evaluation of Public Services in Greece

The initial implementation of a citizen-led evaluation system for public services in Greece, via the digital platform axiologisiypes.gov.gr, presents a characteristic case where the enhancement of participatory tools in public administration is intertwined with significant questions regarding their institutional purpose and methodological reliability. The initiative was unveiled by the Greek government in May 2025 as a new tool for the participatory assessment of public administration, integrated into the broader digital transformation policies developed over the last decade (Υπουργείο Εσωτερικών, 2025). Within this framework, for the first time, citizens gained the ability to systematically evaluate public services through a unified digital platform, creating a new form of feedback collection for administrative performance.

The first phase of the process took place between May 6 and May 31, 2025, attracting approximately 64,789 participants, who evaluated around 45 public services through an electronic questionnaire consisting of roughly fifty questions. Responses were provided on a numerical Likert scale ranging from 1 to 10, while participation was authenticated through personal TaxisNet credentials to ensure the uniqueness of each citizen's input. The survey covered three core categories of services: central administration services, such as tax authorities or social security agencies; local government services, including sanitation, road networks and municipal lighting; and digital public services, including the

single government portal gov.gr (Υπουργείο Εσωτερικών, 2025). The results of the initial survey indicated generally high satisfaction levels for digital public services. Conversely, significant weaknesses were identified in local government services, particularly concerning infrastructure, sidewalks, road networks and parking. The government announced that this evaluation process would be repeated twice annually, aiming to establish a stable database of citizen feedback for the systematic improvement of public service quality (Υπουργείο Εσωτερικών, 2025).

At the level of institutional design, this initiative appears to align with the principles of open government, as it introduces a mechanism for collecting evaluations from public service users. However, when examined through the lens of the theoretical debate on participatory governance, significant questions arise regarding the actual scope of influence that citizen participation can have in such processes. As Fung (2006) points out, the substantive importance of a participatory process does not depend solely on whether citizens are allowed to express their views, but primarily on whether this process is institutionally linked to a decision-making mechanism (Fung, 2006). In the case of the Greek evaluation platform, the process is largely limited to the collection of citizen satisfaction data without a clearly institutionalized mechanism connecting these evaluations to specific administrative interventions, policy changes or accountability procedures within public organizations. In this sense, the platform functions more as a mechanism for recording impressions rather than as a tool for the institutional co-creation of policy.

This observation is linked to the broader concept of symbolic participation (tokenism), as described in Arnstein's (1969) classic model. At the level of the participation ladder corresponding to tokenism, citizens have the opportunity to express opinions or provide information without possessing any substantive ability to influence decision-making. Participation functions primarily as a mechanism for legitimizing administrative action and less as a tool for delegating power to society. In this context, the operation of the evaluation platform can be viewed as an example of an institutional practice situated near the lower rungs of the participation ladder, as the collection of citizen feedback is not accompanied by a clearly defined mechanism for integrating that feedback into the administration's decision-making processes.

At the same time, this case raises significant methodological issues regarding the reliability of the data collected through the platform. One of the primary concerns pertains to the phenomenon of self-selection bias. Participation in the survey was voluntary rather than based on random population sampling, meaning the sample may over-represent citizens with either intense experiences or strong attitudes toward public services. Research methodology literature points out that voluntary user satisfaction surveys often attract a limited and non-representative subset of a service's users, which can lead to systematic discrepancies between survey results and the actual experience of the general population (Krosnick, 1999). In the case of the Greek survey, despite the significant participation of approximately 65,000 citizens, only 184 municipalities gathered a sufficient sample of responses for reliable statistical analysis, suggesting an uneven geographical distribution of participation (Υπουργείο Εσωτερικών, 2025).

A second major issue concerns digital exclusion. Participation in the survey required authentication via personal TaxisNet credentials and access to digital public administration services. This prerequisite may limit the involvement of specific social

groups, such as elderly citizens or individuals with limited digital skills. International literature on participatory governance has highlighted that digital forms of participation often tend to over-represent citizens with higher levels of education and digital literacy, thereby creating a systematic bias in the composition of the participant sample (Van Ryzin, 2004). This limitation is acknowledged by the Ministry of Interior itself; in its detailed Evaluation Report (May 2025 Survey), it states that "de facto, digital services, such as the gov.gr statutory declaration, are more easily accessible to the category of respondents who participated" (Υπουργείο Εσωτερικών, 2025).

Yet another methodological concern pertains to the fact that the questionnaire did not require participants to have had a recent experience using the service they were evaluating. Consequently, responses may be based not on direct experience but on general impressions or information derived from public discourse, media, or the experiences of others. Research in cognitive theory indicates that responses to evaluative questions are often formulated at the moment of answering through memory retrieval processes. That is, respondents tend to rely on experiences that are more easily accessible or more emotionally intense, which can disproportionately affect the final evaluation of a service (Tourangeau et al., 2000).

Furthermore, the research methodology relies primarily on numerical Likert-type rating scales. While these scales are widely used in the social sciences to measure attitudes and perceptions, literature has highlighted significant limitations in their use. Likert scales convert complex experiences and attitudes into a limited number of response categories, which can result in a loss of information regarding the true intensity of respondents' attitudes (Westland, 2022). Moreover, data derived from such scales are often influenced by systematic response biases, such as the tendency to avoid extreme options (central tendency bias), the tendency to agree with the phrasing of the question (acquiescence bias) and the tendency to provide socially desirable answers (social desirability bias). These phenomena have been extensively documented in research methodology literature and can significantly affect the distribution of responses and the interpretation of results (Kusmaryono et al., 2022; Moors, 2008).

Finally, perhaps the most significant issue raised in this case study concerns the limited analytical value of simple satisfaction indicators for public policy-making. Unidimensional satisfaction scores do not easily allow for the isolation of specific factors influencing service quality, such as processing time, the complexity of administrative procedures or the quality of communication with citizens. Under these conditions, how can a public body assign substantive meaning to a specific value on the scale and decide which interventions are required for a service under evaluation? What exactly differentiates – at the level of operational improvement – a rating of "6" from a rating of "7" on a Likert scale? For this reason, the literature on public service evaluation suggests the use of more complex analytical models of service quality, which allow for greater reliability in analyzing the factors that affect user experience (Van Ryzin, 2004).

Overall, the case of the public service evaluation platform in Greece highlights the complex relationship between digital participation tools and the substantive influence of citizens on public administration. On one hand, the initiative introduces a new mechanism for collecting data on the experience of public service users. On the other hand, the absence of clear institutional mechanisms for integrating citizen feedback, combined with the methodological weaknesses of the collected data, limits the process's potential to

function as a meaningful tool for participatory governance. In this sense, this case can be interpreted as an example of participation washing – that is, the adoption of participatory tools that symbolically enhance the legitimacy of public administration without substantively altering decision-making processes. In this instance, participation functions primarily as a procedural mechanism for gathering input, without being accompanied by a clear process of listening, processing, and integrating citizen feedback into the formation of public policy – precisely because the methodology of this feedback offers limited conclusions regarding the specific characteristics of the public services placed under citizen judgment.

Case Study: The Clifford Case in Great Britain

The case *R (Clifford) v Secretary of State for Work and Pensions* [2025] (EWHC 53) arose from a judicial review challenging the legality of a public consultation conducted by the British Department for Work and Pensions (DWP) in the autumn of 2023. The consultation concerned proposed changes to the system for assessing the work capability of individuals with disabilities or serious health conditions. This initiative was part of a broader social policy reform in the United Kingdom, aimed – according to the official government justification – at adapting the benefits system to modern labor market conditions, where remote work and flexible forms of employment are considered to create new participation opportunities for people with health limitations (Department for Work and Pensions, 2023).

At the heart of the case was the Work Capability Assessment (WCA), the administrative evaluation process used by the British state to determine whether an individual receiving or applying for disability or health-related benefits is deemed fit for work. This system functions as a mechanism for categorizing claimants: depending on the assessment outcome, an individual may be considered fully fit for work, deemed to have limited capability for work, or placed in a group where they are not expected to seek employment due to severe limitations. The assessment is based on a set of predefined activities and corresponding functional capacity descriptors, which capture specific daily or work-related functions – such as mobility, concentration, social interaction or the performance of basic work tasks. Each descriptor corresponds to a specific score, and the total points determine the category into which the claimant is placed, and consequently, the regime of benefits or obligations that applies to them (Department for Work and Pensions, 2023).

The consultation that became the subject of the legal challenge concerned proposed changes to several of these descriptors. Specifically, the department proposed modifying criteria related to functional limitations – such as mobility, social interaction, or the ability to manage anxiety – arguing that existing categories did not adequately reflect the current labor market. The government’s argument emphasized that the widespread use of digital technologies and teleworking makes employment feasible for individuals who were previously considered to face insurmountable barriers to work. Consequently, the consultation paper presented the changes as a technical realignment of how the state assesses work capability, aimed at better matching social benefits with actual opportunities for labor participation (Department for Work and Pensions, 2023).

The public consultation opened on September 5, 2023, and concluded on October 30 of the same year. During this period, civil society organizations, disability rights advocacy groups and individual citizens were invited to submit comments and observations

regarding the proposed changes. Among the participants was the claimant in the case, who challenged the process by arguing that the consultation failed to provide sufficient information to allow for an understanding of the true consequences of the proposed reforms. More specifically, during the judicial proceedings, it was revealed that, according to the department's own internal estimates, the implementation of the proposed changes would lead to a significant reduction in social security expenditure. Specifically, it was calculated that approximately 424,000 individuals annually would receive lower benefits as a result of the modification of the descriptors, with the average loss of income for affected persons amounting to approximately £416 per month. These same forecasts estimated that the reform would result in fiscal savings of approximately £1.4 billion per year by the end of the decade. Conversely, the department estimated that the reform would lead to only a limited increase in employment, with roughly 15,000 people entering the labor market as a direct result of the changes (*EWHC 53*, 2025).

The critical issue that arose in the case was that this information was not included in the consultation paper released to the public. The document presented the changes primarily as a functional update to the assessment system and did not explicitly refer to the fiscal dimension of the proposed measures or their potential social consequences. During the hearing, the High Court ruled that this omission was of substantive importance because it meant that consultation participants did not have at their disposal the information necessary to fully evaluate the proposed policy. The failure to present the core rationale behind the changes was deemed to have undermined the participants' ability to form an informed opinion regarding the proposed reform (*EWHC 53*, 2025).

The court's ruling was based on the established principles of English administrative case law regarding lawful public consultation, known as the "Gunning Principles". These require that consultation must take place at a stage when proposals are still at a formative stage, provide sufficient information to allow participants to give an intelligent response, allow adequate time for participation and ensure that the product of consultation is conscientiously taken into account. The case law of the UK Supreme Court has further clarified that the requirement for adequate information may include presenting the core reasons driving a specific policy choice, especially when the proposed changes carry significant social implications (*UK Supreme Court*, 2014).

In the Clifford case, the High Court ruled that these requirements were not met. The consultation paper failed to provide sufficient information to enable participants to grasp the true impact of the proposals, while the duration of the consultation – just under eight weeks – was deemed inadequate for a reform affecting such a large number of social benefit claimants. This finding is particularly noteworthy when compared to the typical duration of public consultations in Greece (as previously noted), which is approximately two weeks – and in some cases even shorter – highlighting significant discrepancies in what is considered "adequate time" for participation across different administrative environments. Returning to the Clifford case, the court further found that the non-disclosure of the fiscal dimension meant that participants were kept in the dark about one of the primary drivers of the proposed policy. For these reasons, the consultation was ruled unlawful, and the government was compelled to reconsider the process (*EWHC 53*, 2025).

The reaction from civil society organizations and disability rights advocacy groups confirms the central importance of the issues highlighted in the judicial decision. Even during the consultation period, organizations such as Disability Rights UK had pointed

out that the consultation document was not accompanied by an adequate impact analysis and that the duration of the process was extremely limited for a reform of such magnitude. Following the ruling, the Public Law Project emphasized that the case underscores the vital importance of transparency in public consultations, particularly when policies affect vulnerable social groups (Disability Rights UK, 2025; Yuill, 2025).

The Clifford case demonstrates with particular clarity that the mere existence of a consultation process does not necessarily entail substantive stakeholder participation in the policy-making process. As a case study, it illustrates a precise instance of institutional tokenism, as described by Arnstein (1969): an open consultation existed, yet it lacked the conditions that would allow it to function as a meaningful mechanism for co-creation. Although the department published a consultation paper and gathered responses from organizations and citizens, the conditions under which the process took place – limited information, a brief window for participation, and a lack of transparency regarding the core impacts of the policy – significantly restricted the participants' ability to fully understand and evaluate the proposed changes.

From the perspective of administrative legality, the High Court's decision serves as a reminder that public consultation cannot function as a mere formal procedure for validating pre-determined decisions. On the contrary, it must provide stakeholders with sufficient information and time to form a reasoned opinion before the final decision is made. The Clifford case, therefore, highlights the importance of the substantive quality of participatory processes in public governance and demonstrates that the effectiveness of these mechanisms depends not only on their existence but, crucially, on the manner in which they are designed and implemented.

4.4 Transparency Washing

As highlighted in subsection 4.1, the distortions of openness are not limited to the technical and organizational conditions of data provision but can more broadly affect transparency and accountability. In this sense, "data washing" can be viewed as a specific form within a wider spectrum of "transparency washing". This subsection shifts the focus from open data in the narrow sense toward general practices of institutional information disclosure. This shift is necessary to demonstrate what international literature on open government has already pointed out: that the relationship between transparency and accountability is far less direct than often assumed, particularly when the disclosure of information is not accompanied by conditions that allow for substantive public oversight (Fenster, 2015; J. Fox, 2007).

Thus, transparency washing refers to cases where information is formally disclosed – often through institutionally organized procedures – without ensuring a corresponding substantive capacity for oversight, comprehension and accountability. The issue here is not primarily whether the data is machine-readable or technically reusable (as approached in subsection 4.1), but whether the disclosure itself is timely, sufficiently structured, comparable and practically actionable for public accountability.

Transparency washing is identical neither to a complete absence of transparency nor to the simple failure to fulfill a disclosure obligation. On the contrary, it concerns forms of

"attenuated" transparency, where information is indeed provided, but under conditions that severely limit its accountability value: with significant time lags, fragmentation, excessive interpretative burden on the user or a presentation structure that prevents formal visibility from easily translating into actual knowledge. After all, as has been noted, transparency is not politically neutral, nor does it function automatically as an empowering good; rather, it depends on the legal, institutional, informational and interpretative conditions under which information becomes available and actionable (Fenster, 2015; Pozen, 2020).

At this point, a distinction is perhaps necessary regarding the underlying causes of this attenuated transparency. In some instances, information is disclosed in a manner that appears to strategically limit the capacity for oversight, producing forms of intentional obfuscation through the very management of visibility (Stohl et al., 2016). In others, conversely, the reduced accountability value of transparency may be linked more to administrative inertia, organizational dysfunctions, obsolete procedures or an inability to implement reforms. This distinction does not aim to provide a definitive diagnosis of intentions, as such an endeavor would not only be exceptionally difficult but would also fall outside the scope of this analysis. However, it serves to highlight two different logics through which formal disclosure can be weakened as a mechanism of public oversight.

In any case, this category is particularly critical for open government because it touches the very core of its promise: that access to information can strengthen the oversight of power and make public action substantively auditable. However, this study focuses on the fact that informational openness does not exhaust the meaning of open government, nor does it guarantee substantive accountability on its own (Meijer et al., 2012). The cases that follow examine precisely these forms of disclosure, where information is not fully concealed but is provided in a manner that restricts its practical, temporal or accountability utility.

Case Study: Asset Declarations of Elected Officials

The publication of asset declarations by elected officials and other obligated persons is one of the most classic mechanisms of institutional transparency in modern democracies. It is directly linked to the prevention of conflicts of interest, the detection of illicit enrichment and the accountability of those exercising public power. In the Greek case, the institution of "Pothen Esches" (Source of Wealth) has a long history (Λιβιτσάνος, 2018), suggesting that its institutional significance is particularly high. This is precisely because the information disclosed is not a neutral administrative entry but data with clear accountability implications. This makes the case study exceptionally useful for analyzing transparency washing, as the information, while not absent, is made public in a manner that often limits its immediate value for oversight.

Prior to the recent reform of the framework with Law 5026/2023, the system was characterized by significant instability and significant lags in publication. For example, on December 28, 2016, the Hellenic Parliament announced the release of declarations for the years 2014 and 2015 – referring to the fiscal years 2013 and 2014 (Βουλή των Ελλήνων, 2016). Organizations like Vouliwatch and other monitoring bodies noted as early as 2016 that publications had previously occurred with delays of up to three years (Vouliwatch, 2016). This period was also marked by intense institutional friction, particularly regarding the application of the framework to judicial officers and issues

concerning the constitutionality and organizational functioning of the auditing mechanism (Λιβιτσάνας, 2017). The result was a regime where the existence of a filing obligation did not always translate into timely and consistent public visibility. In the context of transparency washing, this "delayed transparency" serves as a primary example of how the temporal dimension of data can neutralize its political impact; information released years after the fact loses its relevance for active democratic scrutiny.

Even when declarations were made public, for a long time, access remained primarily oriented toward the static posting of individual documents rather than a mature, coherent and analytically user-friendly accountability environment. The need to reform this framework was acknowledged by the Greek administration itself. In the memorandum submitted by Greece for the 2023 Rule of Law Report, the existing regulatory framework was described as "fragmented or outdated", while the new draft law was presented as an intervention that would lead to the full digitization of the process, a clearer demarcation of the auditing work and significant legislative and technical improvement of the current regime (European Commission, 2023). This specific source is particularly significant, as it demonstrates that the 2023 reform was not promoted as a routine legislative arrangement, but as a response to recognized problems of organization, updating and functionality.

The fundamental institutional breakthrough indeed occurred with Law 5026/2023, which comprehensively overhauled the regime for declarations of assets and financial interests. The law itself defines its purpose as strengthening transparency, improving the effectiveness of audits, reducing the fragmentation of auditing bodies and streamlining the process through digital tools. In the same spirit, the subsequent Law 5130/2024 explicitly provided for the possibility of automatic data extraction for asset declarations, an element that enhances structural standardization and the further digitization of the system. These facts document that after 2023, there is a clear shift toward a more standardized and digitally assisted system.

This progress has also been recognized at an international level. The Council of Europe's Group of States against Corruption (GRECO), in its 2024 compliance report for Greece, noted that since Law 5026/2023 came into force, there has been "significant progress" in strengthening the verification of declarations, pointing out that the new framework simplified electronic submission and provided for a more effective oversight mechanism (GRECO, 2024). Similarly, the European Commission, in its 2025 Rule of Law Report, states that the law on asset declarations was revised to facilitate the process of submitting and verifying interests (European Commission, 2025a). Today, the Hellenic Parliament maintains organized disclosure pages for the declarations of 2022, 2023, and 2024¹, while the uploaded files are generally text-editable PDFs rather than mere scans without content extraction capabilities. The existence of the Vouliwatch platform² for "Pothen Esches" – which collects, organizes, and compares MPs' declarations in a way that allows for statistical and comparative reading – confirms in practice that the available material is now, to an extent, machine-readable and processable.

¹ See <https://www.hellenicparliament.gr/Organosi-kai-Leitourgia/epitropi-elegxou-ton-oikonomikon-ton-komaton-kai-ton-vouleftwn/dilosi-periousiakis-katastasis-arxiki>

² See pothenesxes.vouliwatch.gr

Precisely here, however, the central issue of this case study emerges. Despite the improvement of the institutional framework and progress in digitization, standardization and the relative enhancement of accessibility, the time lag in disclosure remains critical. The Parliament's Audit Committee announced on September 29, 2025, that the declarations for the years 2023 and 2024 (referring to the fiscal years 2022 and 2023) were posted then (Βουλή των Ελλήνων, 2025). In other words, by late 2025, the public was gaining access to information concerning financial data from at least two years prior. Furthermore, in February 2026, the official "pothen.gr" submission platform still allowed late submissions for the years 2023 and 2024, while the submission cycle for the year 2026 (fiscal year 2025) had already opened³. This indicates that the system still operates at an asynchronous and "extension-based" pace, with administrative completion and public visibility systematically pushed back. This inconsistency seems part of a broader pattern of extensions and "exceptional" regulations; both before and after Law 5026/2023, exceptional extensions to submission deadlines have been repeatedly granted, as seen in Laws 5072/2023, 5113/2024 and 5167/2024 (Στυλιανίδου, 2024). The problem, therefore, is not a lack of an institutional framework, but that the very application of the framework continues to produce delayed transparency.

From the perspective of transparency washing, this holds particular significance. The information is not concealed; on the contrary, it is disclosed through an institutionally organized process and in a format clearly improved compared to the past. However, its accountability value remains weakened because the disclosure is primarily retrospective. Such transparency is useful for retroactive journalistic, research or political evaluation, but less effective for timely public oversight in close temporal proximity to the exercise of power. In a joint report on the state of the rule of law in Greece, civil society organizations point out that declarations do not become directly and timely accessible to the public due to constant extensions and delays in their publication, while also raising broader issues regarding the inconsistency of the Parliament's Asset Declaration Audit Committee (HIAS Ελλάδας et al., 2026).

Furthermore, certain critiques of the new framework suggest that the improvement of the process does not automatically equate to optimal substantive transparency. Govwatch has noted, among other things, that the new law does not mandate the declaration of cash above a certain threshold or certain high-value movable assets (Στυλιανίδου, 2023), highlighting that the content of the disclosed information remains a subject of concern. It should be noted here that although these sources are not equivalent to state or international institutional evaluations, they serve as a useful indication that the reform, significant as it may be, does not seem to respond satisfactorily to the demand for full transparency and accountability adequacy.

In conclusion, the case of elected officials' asset declarations in Greece documents a mixed picture: real institutional and technical progress, yet persistent lagging regarding the time at which information becomes effectively available to the public. This is precisely what makes the case analytically powerful for describing transparency washing. Transparency exists, it is more structured and processable than in the past, but it continues to function to a significant extent as belated transparency, whose practical value for immediate democratic oversight remains limited. In this sense, the "Pothen Esches" of elected

³ See <https://www.pothen.gr/pothen-main/main/ypovolh.html>

officials constitutes a characteristic example of a transition from an older regime of incomplete and unstable disclosure to a more mature digital system, which, however, has not yet fully bridged the distance between formal publicity and substantive, timely accountability.

Case Study: KHMDIS/ESIDIS and Public Procurement

The Central Electronic Register of Public Procurement (KHMDIS), in conjunction with the National Electronic Public Procurement System (ESIDIS), constitutes the primary mechanism for the publicity of public contracts in Greece. Its existence is linked to the gradual digitization of public procurement and the institutional objective of collecting and disclosing contract data at every stage of their cycle. In practice, this is one of the most characteristic examples where public information is not only present but is produced on a large scale and systematically posted through established digital infrastructures (OECD, 2023b). The critical question, however, is not whether publicity exists, but whether the architecture of this publicity allows for substantive social oversight and systematic analytical utilization, or if it primarily serves formal compliance with the obligation to publish.

Law 4013/2011 established KHMDIS as a publicity register for public contracts, with its operational function beginning in 2013. Subsequently, Law 4412/2016 systematized the operation of KHMDIS and ESIDIS within a unified framework of transparency and publicity, incorporating the new European regulatory framework for public procurement and highlighting a more coherent architecture for the electronic conclusion, publicity and management of public contracts. The significance of these systems transcends the narrow limits of the digital transformation of an administrative or economic process. Public procurement is internationally recognized as one of the fields most vulnerable to corruption, precisely because it combines high financial stakes, significant discretionary power, technical complexity, and powerful private interests (Morgner & Chêne, 2014). In OECD member countries, it is estimated that public procurement accounts for an average of 29% of their expenditures, while Transparency International characterizes public procurement as one of the most corruption-prone fields globally regarding the management of public resources (Morgner & Chêne, 2014).

Specifically for Greece, the aforementioned institutional architecture created, from an early stage, the image of a system with a strong normative and informational promise. KHMDIS and ESIDIS were not designed merely as technical management tools for procurement procedures, but as pillars of a broader logic of electronic publicity, data aggregation and enhanced transparency in the public contracting market. From this perspective, it is a field where information is systematically produced, registered and posted through official digital infrastructures (OECD, 2023b). However, the existence of systematic publicity does not automatically equate to substantive accountability and transparency. The question is not only whether public procurement data is posted, but whether it is organized in a way that allows researchers, journalists, stakeholders or citizens to easily obtain a coherent picture of spending patterns, awards and market concentration.

In the MAPS assessment for Greece, the OECD acknowledges a degree of transparency through e-procurement portals but explicitly notes that information "is not presented in a way that facilitates social oversight" (OECD, 2023b: p. 113) and that electronic systems

do not aggregate information in a manner that allows for analysis and the drawing of conclusions. The same report emphasizes that data should be available in a more user-friendly and machine-readable format, further noting that the two databases do not interoperate – a fragmentation that leads to inefficiencies in public contract management (OECD, 2023b: p. 224).

This diagnosis is particularly significant because it shifts the weight from the legal existence of publicity to the quality of information as a public good. In other words, the problem lies in the limited transformation of a large volume of administrative information into a tool for social control and systematic analytical use. The Greek state itself appears to have recognized this deficit. In the Digital Transformation Bible 2020-2025, the redesign of KHMDIS is described as a project aimed at transforming it into an open data system with improved functionality, adopting structured and interconnected data, automated statistics generation and the development of a relevant API. It also makes explicit reference to the need for the gradual convergence of KHMDIS and ESIDIS into a more unified information architecture (Υπουργείο Ψηφιακής Διακυβέρνησης, 2023).

This very description confirms that the pre-existing publicity scheme was considered inadequate in terms of both structure and the capacity for analytical data utilization. The clearest indication that the KHMDIS publicity regime is in a transitional stage is the official release of the Open Data API in 2025. In an information note dated June 10, 2025 (Document Ref. 18856EX2025/10.6.2025), the Ministry of Digital Governance announced that an application for retrieving open data for KHMDIS is now available, providing free access and search capabilities for publicly available data via a relevant API (Υπουργείο Ψηφιακής Διακυβέρνησης, 2025). The API documentation⁴ itself states that metadata and records of registered acts are updated automatically every 24 hours, indicating a more mature and systematic logic for data provision.

The significance of this transition becomes particularly visible through the recent Consultocracy⁵ initiative. The relevant investigation by Vouliwatch, conducted in collaboration with Solomon, mapped more than 3,000 consulting service contracts for the Greek State for the period 2017-2025, totaling over €1.5 billion, using KHMDIS as its primary data source (Κωστίκα, 2026). The report emphasizes that the platform created for the study offers a "much more user-friendly environment" compared to KHMDIS, providing CSV export capabilities and easier access for researchers and journalists (Κωστίκα, 2026). Although the research data focuses exclusively on mapping consulting services rather than broader public procurement patterns, it highlights a point that is critical to this case study. The data already existed within KHMDIS, but the ability to transform it into a coherent market overview – to filter, compare and present it in a publicly understandable way – was only substantially enhanced when structured extraction and organization became feasible. In other words, Consultocracy does not merely show that "the system is improving"; it retrospectively illuminates its previous limitations. For a long period, information was indeed available, but not to a degree that favored mapping, comparative analysis or social oversight on its own.

⁴ See <https://cerpp.eprocurement.gov.gr/khmdhs-opendata/help>

⁵ See <https://consultocracy.vouliwatch.gr/>

From this perspective, the case of KHMDIS and ESIDIS is exceptionally useful for approaching transparency washing. This is not a matter of missing information or institutional silence, but a regime where publicity functioned for a long time more as formal compliance with the obligation to publish than as a fully mature mechanism for social supervision and systematic analytical utilization. The recent release of the Open Data API and the emergence of initiatives like Consultocracy indicate that the system is moving toward more substantive transparency. Simultaneously, however, they make the prior deficit more visible: that the mere posting of information was not enough, by itself, to transform it into a genuine tool for accountability.

Case Study: "Black Pages" and FOIA in the USA

In the United States, the primary federal law enshrining the right of access to administrative records is the Freedom of Information Act (FOIA). This is the core legislative provision regulating the disclosure of administrative documents by federal agencies, as established under 5 U.S.C. § 552. FOIA⁶ is grounded in the principle that administrative records should, in principle, be accessible to the public unless one of the explicitly provided statutory exemptions applies. These exemptions are nine in total and cover, among other things, issues of national security, privacy protection, confidential commercial information and certain categories of internal or deliberative agency communications (U.S. Department of Justice, 2016). The fundamental logic of the law is that disclosure is the rule and secrecy the exception, which must be interpreted narrowly and specifically justified by the administration.

In the day-to-day application of FOIA, agencies often respond to requests not with an outright denial, but by delivering documents that have undergone partial concealment of information. This process is carried out through so-called redactions – "blacked-out" sections of text within the released documents. In this way, the requester formally receives the document they sought, but specific portions of the content have been removed because they are deemed to fall under one of the law's exemptions. From a legal standpoint, this practice is entirely foreseen and often necessary, especially when a document contains both information that must be disclosed and information that must be protected.

The problem, however, lies in a more subtle form of institutional opacity: when these redactions are made to such an extent or in such a way that the final document largely loses its informational and accountability value. In these cases, the administration may appear to have complied with the transparency requirement – since it formally delivered the document – but in practice, it has removed exactly those elements that would allow for substantive public oversight of administrative action. As mentioned in the introduction, transparency is not automatically synonymous with accountability; it depends on the institutional and practical framework within which information is produced, organized and shared (Koningisor, 2020; Pozen, 2020).

The FOIA legal framework itself theoretically includes significant safeguards specifically aimed at limiting such phenomena. First, the law provides that courts review these cases based on "de novo" review (U.S. Department of Justice, 2016). This means the court is not restricted to examining whether the administrative judgment was reasonable but is

⁶ See <https://www.foia.gov>

called upon to evaluate from scratch whether the invocation of the exemption is indeed lawful. Second, FOIA imposes an obligation on agencies to disclose any "reasonably segregable" portion of a record, even when other parts of the same document are covered by an exemption. This principle, known as segregability, aims to prevent the practice of withholding entire documents when a significant part could be released – meaning any portion that can be provided without harming the interest protected by the exemption. Third, following the FOIA Improvement Act of 2016, the administration cannot merely invoke an exemption in the abstract; it must also demonstrate that disclosure would cause "foreseeable harm" to a legally protected interest. This reform was adopted precisely because it was found that exemptions were often applied excessively, defensively or almost mechanically. The Department of Justice clarified that in cases of doubt, openness should prevail, and agencies should not rely on abstract, speculative or merely defensive claims of harm (Office of Information Policy, 2023; U. S. Government Accountability Office, 2018).

Despite these institutional provisions, relevant literature has pointed out that the practical application of the law is significantly influenced by judicial attitudes. Margaret Kwoka has shown that, although FOIA mandates *de novo* judicial review, case law often appears particularly deferential to the administration's claims of secrecy (Kwoka, 2013, 2014). In other words, courts tend in many cases to accept agency justifications without particularly rigorous scrutiny. As a result, challenging redactions through judicial channels often remains difficult, time-consuming and financially demanding for requesters. This is exactly why excessive redactions hold particular analytical significance: they constitute a way for the administration to maintain symbolic control over the transparency narrative. The document is delivered, the requester receives a response and the agency appears to have acted within the framework of the law – yet the information that would allow for a substantive public evaluation of the decision, the process or the legal basis of state action has been removed. In this sense, redactions are more than a simple silencing of content; they are the shaping of the terms under which society is permitted to "see" the state.

The case *New York Times Co. v. DOJ* is perhaps the clearest example of how selective disclosure constitutes a form of transparency washing. The case concerned legal memoranda regarding the lawfulness of targeted lethal drone operations against American citizens. The government had publicly defended the legality of this policy, citing the existence of extensive legal analysis, while simultaneously attempting to keep that very analysis secret. The U.S. Court of Appeals for the Second Circuit ruled that this strategy was unacceptable. When high-ranking officials publicly invoke the legal background of a policy, the government cannot simultaneously conceal the relevant legal analysis entirely. In doing so, the court recognized that invoking legality as an element of public legitimacy entails a corresponding obligation for transparency regarding the substance of the legal justification itself. In other words, the government cannot base public acts of power on legal reasoning that it refuses to subject to substantive oversight (Wu & Gersen, 2016).

A similar lesson emerges from the case *100Reporters LLC v. DOJ*, which concerned materials related to a corporate monitor imposed on a company following a settlement with the Department of Justice in a corruption case. The Department invoked a series of exemptions, such as the exemption for internal deliberative communications and the so-called deliberative process privilege – the need to protect internal processes of administrative judgment. While the court accepted some other grounds for denial, particularly regarding confidential commercial information, it ruled that the invocation of

the deliberative process privilege had not been substantiated with the required clarity. The court found that the administration had described both the relevant decision-making process and the role of the contested documents within it in an overly vague manner (U.S. Department of Justice, 2017). What is interesting here is that the case does not, of course, abolish the lawful existence of the exemption, but rather highlights how its broad and vague invocation can be transformed into a tool for the systematic contraction of transparency.

The most recent case, *Long v. ICE*, makes the problem even more visible because it concerns not just traditional texts but the technical documentation of databases, such as data dictionaries, coding tables and field descriptions. In this instance, the court accepted that certain information – such as data capturing the structure and relationships within a database (e.g., primary and foreign keys or inter-table connections) – could be withheld for law enforcement purposes, provided that its disclosure could reasonably facilitate the circumvention of the law. However, the court did not indiscriminately accept all of the agency's redactions, noting that in several places, the explanations were overly vague and failed to adequately substantiate how the disclosure of a specific element would lead to such circumvention (U.S. Department of Justice, 2026). The significance of this case lies in its identification of a modern form of transparency washing: a set of administrative data may be formally disclosed, but if the definitions, internal relationships between fields and descriptive metadata that allow for the interpretation of a database have been removed, the capacity for substantive oversight remains limited. The state appears to have "opened" the database, while in practice, it drastically restricts the ability to audit how that database organizes, classifies and ultimately influences law enforcement.

Overall, the case of FOIA redactions in the USA shows that sham openness is found in the controlled, fragmented and strategically structured disclosure of information. When the administration provides documents with such extensive redactions that it becomes impossible to reconstruct a legal rationale or understand the architecture of an administrative database, then publicity functions more as a "ritual of compliance" than as a substantive tool for accountability. The importance of studying this practice lies precisely in shifting the analysis from the question "Was something published?" to the more essential question: "Was enough published, and in a format that allows for real oversight?". To the extent that the answer is often negative, excessive redactions can indeed be viewed as a characteristic mechanism of transparency washing within the American freedom of information regime. This third case study, therefore, highlights a different facet of the same core phenomenon: transparency can exist as an institutional claim while simultaneously failing as a practice of social control.

4.5 Ghost Platforms

The category of Ghost Platforms includes digital open government infrastructures that are implemented on behalf of public bodies and enter production, yet fail to become consistently integrated into the organizational practices and administrative workflows of the adopting agencies. Their defining characteristic is not merely low usage, but their inability to transition from technically available tools into functional institutions characterized by continuity, administrative ownership and consistency (Haug et al., 2024).

In this sense, the term is used here as an analytical category to describe the gap between the formal adoption of a digital infrastructure and its substantive institutional activation – a phenomenon already highlighted by the theory of institutional decoupling. In the field of digital governance, the relevant literature similarly points out that digital change in the public sector should not be equated with the simple installation of technology but should be evaluated based on whether it acquires administrative viability, organizational consolidation and longevity (Esposito, 2024; Haug et al., 2024).

The same logic applies to the institutional integration of digital participation tools. Stratu-Strelet et al. (2021) emphasize that the success of such tools depends not only on their technological availability but on their integration into a robust institutional and organizational framework. As previously mentioned, Twizeyimana and Andersson (2019) also demonstrate that the value of e-government is not exhausted by the existence of digital services; rather, it is linked to whether they generate improved services, administrative efficiency, open government capabilities and, more broadly, public value. Thus, ghost platforms are analytically significant because they make visible the void between immediate digital output and the institutional and social outcome of their operation (Stratu-Strelet et al., 2021; Twizeyimana & Andersson, 2019).

At this point, however, an analytical distinction is required between this subcategory and the participation washing examined in subsection 4.3. While in Participation Washing the central problem lies in the activation of participatory processes without genuine listening, response, or integration of citizen input, in Ghost Platforms the fundamental deficit concerns the institutional and organizational failure to establish the digital infrastructure itself. In other words, in the first case, participation functions as a symbolic process, while in the second, the platform fails to stabilize over time as an administrative mechanism. Thus, elements such as low response rates or the lack of utilization of user input may appear in both categories, but in Ghost Platforms, they are interpreted primarily as manifestations of a failure in organizational integration and sustainability, rather than simply as a problem of participatory sincerity.

Case Study: Saronikos Municipality Participation Platform

The e-Dialogos platform of the Saronikos Municipality constitutes a case of digital participatory infrastructure that emerged as a tool for consultation and interaction with citizens, yet lacked documented functional utilization or administrative integration. The platform was accessible via the domain dialogos.saronikoscity.gr; based on available snapshots from the Internet Archive – as it is now inactive – its documented public presence spans from early 2024 to late 2025. This timeline suggests a limited lifecycle of less than two years, which gains significance when correlated with the minimal traces of usage and the absence of administrative continuity.

The architecture of the platform itself indicated a relatively ambitious functional target. From the available visual material accompanying its announcement on the Municipality's website, as well as from exploration of the site during its operational period, it appears that the platform was presented as an integrated participation system. It featured distinct sections for Consultations, Questionnaires, Participatory Budgeting, Proposals/Ideas and a Statistics section. Furthermore, the relevant announcement dated May 10, 2024, on the Saronikos Municipality website characterized it as an application that "gives a voice to the citizen" (Δήμος Σαρωνικού, 2024). This phrasing is significant because it does not

refer to a simple technical page or a limited channel for posting announcements, but to a platform presented as a multifunctional participation tool. Consequently, the empirical assessment concerns not only whether certain consultations took place but whether the platform in question was substantively activated as a broader participatory infrastructure.

A second critical element is that the platform appears to have been based on a ready-made, standardized third-party solution rather than a custom-designed application tailored to the specific organizational needs of the Municipality. This, in itself, is not necessarily problematic, as using "off-the-shelf" digital solutions is common practice in local government. However, in this case, it is significant because it reinforces the image of a technological solution that seems to have preceded substantive organizational integration. In other words, the existence of an available platform does not imply the existence of a corresponding administrative plan for its use, content feeding, the processing of participatory data, or its linkage with decision-making processes.

From accessing the website during its operational period and reconstructing its content via the Wayback Machine⁷ after it became inaccessible, it appears that the platform's actual activity was limited to only two consultations. The first concerned the "Local Urban Plans (TPS)" of the Saronikos Municipality, published on March 29, 2024. The second concerned the "Saronikos Technical Report", published on April 22, 2024. In an initial snapshot, both appeared with an expiration date of May 31, 2024. In a later Wayback Machine snapshot dated June 24, 2024, it appears that both had been granted an extension until June 30, 2024. This finding is methodologically useful because it allows us to rule out the interpretation that the extremely limited participation could be attributed simply to a very short consultation duration. On the contrary, even after the deadline extension, the participation picture remained essentially unchanged.

More specifically, in the initial snapshot of the platform, both consultations appeared with zero comments. In a later snapshot, the first consultation is shown to have gathered four comments, while the second still had none. This point is particularly crucial, not only because it suggests low usage, but because it shows that the platform itself failed to function as a viable channel for participatory mobilization. Even in the most favorable scenario for the platform, the documented total participatory activity is limited to four interventions in only one of the two published consultations. Furthermore, the extension of the duration until the end of June 2024 does not seem to have been accompanied by a substantive change in this picture. Consequently, this is not merely a case of limited participation during an initial operational phase, but of consistently marginal to zero usage during the period the platform appears active.

This limited activity gains even greater significance when correlated with the wide range of functions the platform was supposedly intended to provide. Despite the existence of distinct modules for questionnaires, participatory budgeting and citizen proposals or ideas, no substantive activation of these functions is documented. Based on available snapshots, these sections either appeared empty or, at the very least, failed to produce any detectable trace of public activity. This observation is analytically important because it shifts the focus from a simple finding of low usage to a broader image of an inactive functional

⁷ See https://web.archive.org/web/2026000000000000*/https://dialogos.saronikoscity.gr/

platform. In other words, the website appears to have underperformed not only in terms of participation intensity but also regarding the scope of the tools it promised to activate.

In parallel, the public and institutional communication regarding the platform's presence appears extremely limited. On the Municipality's website, essentially only one announcement related to its launch can be found, with no subsequent references, updates, reports or reminders. There is, in fact, no evidence of even elementary communicative continuity that would indicate an effort toward institutionalizing or repeatedly activating the platform as a permanent participatory channel. This absence does not merely raise questions about communication strategy; it relates more broadly to whether the platform was treated as an enduring governance tool or as a one-off digital application with limited exposure and short duration. The most critical element, however, concerns the administrative traceability of the platform. For a digital consultation to be considered institutionally valuable, it is not enough to formally provide the possibility of submitting comments. A documented link to administrative action is required: a report on the results, the utilization of comments, their integration into decisions, or at least a rudimentary accountability for the outcomes of the participatory process.

In the case of the Saronikos Municipality, a targeted search on the Diavgeia (Transparency Program) portal, using keywords related to the consultation, the platform and relevant terms, yielded no results. No decision, administrative act or other public document was found referring to the platform, its results or the utilization of any participatory content possibly generated through it. Furthermore, no relevant contract was identified in KHMDIS, although this finding alone is insufficient to draw a definitive conclusion regarding the platform's contractual or financial status. These findings were further corroborated through an independent expert check of publicly available evidence, which confirmed the overall picture of limited usage and a lack of administrative footprint. This absence is particularly weighty as it serves as evidence of the platform's failure to integrate into administrative workflows. Moreover, there is no documentation suggesting the platform was used again as a recurring participation tool after June 2024. The resulting image is that of a digital infrastructure that appeared momentarily – as a "firework" – in terms of both promotion and operation, without securing a detectable place within the Municipality's internal administrative cycle.

In summary, the Saronikos Municipality case presents a clear sequence: the initial public promotion of a multi-functional participatory platform, the restriction of its documented activity to only two consultations, extremely low to zero participation, the failure to activate other intended functions, a lack of administrative footprint, and, ultimately, the cessation of operation within a horizon of less than two years. The key finding is not merely that the platform saw little use, but that it is not documented to have functioned as a stable and integrated participation mechanism. In this sense, this case clearly highlights how the practice of Technological Solutionism (Morozov, 2014) operates, revealing the gap between the technical installation of an open government tool and the actual production of public value – the very discrepancy between output and outcome.

Case Study: Labs.OpenGov Innovation Platform

In stark contrast to the practically non-existent participation in the case of the Saronikos Municipality's e-Dialogos platform, the platform examined in this case study not only garnered mass participation during its initial launch but also displayed rich activity with a

multitude of substantive contributions. This was Labs.OpenGov.gr, an open innovation platform designed to collect, discuss, prioritize and highlight proposals related to the improvement of public administration. According to reports regarding the platform in Greece's first National Action Plan (2012-13) under the Open Government Partnership, more than 3.000 members, 850 proposals and over 2.000 comments across five thematic activity cycles were recorded (Ελληνική Κυβέρνηση, 2012). These figures indicate that the platform triggered genuine interest and amassed participatory material with substantive administrative content.

According to Deligiannis and Peristeras, Labs.OpenGov.gr was linked to a broader strategy of open and participatory production of administrative innovation. The platform is described as a space for participatory idea generation (crowdsourcing) and as a field for developing communities of practice among citizens, public servants, and experts (Deligiannis & Peristeras, 2025). This picture is significant for an additional reason: the broader political and administrative context in which it operated must be understood. According to Deligiannis and Peristeras, Labs.OpenGov was one of the cornerstone projects of the Greek E-Government Team, a small and flexible public innovation unit operating within the Prime Minister's Office during the period 2009-2012 (Deligiannis & Peristeras, 2025). It was precisely this proximity to the highest level of executive power that provided the team with a high degree of political access, speed and the capacity for horizontal coordination. The same analysis, however, highlights the flip side of this proximity: the difficulty of sustainability, limited institutional anchoring and the impact of political discontinuity on the long-term consolidation of such initiatives (Deligiannis & Peristeras, 2025). Under the conditions of successive government changes in 2011 and 2012, Labs.OpenGov.gr appears to capture exactly this form of vulnerability – namely the difficulty of a digital infrastructure surviving beyond the political cycle that gave rise to it. It is worth noting that another cornerstone project of the same team was the Diavgeia (Transparency) program, which was examined in a previous case study.

The way the platform's operation was organized is of particular value. Labs.OpenGov.gr was not limited to an open form for submitting ideas. On the contrary, it possessed a fairly clear procedural organization, which included the selection of a thematic cycle, a public call for participation, submission of proposals, commenting and evaluation by the community, processing by a scientific committee, public presentation of selected proposals in workshops, and – at least at the design level – briefing administrative executives and general secretaries depending on the theme of each proposal. In the 5th cycle, which focused on reducing the operating costs of public bodies and improving administrative procedures in transactions with citizens and businesses, it was explicitly stated that in selecting proposals, the scientific committee jointly considered the evaluation of registered users along with the accuracy in describing the problem, the maturity of the solution and resource savings (EKT, 2012). This element is crucial because it shows that, right from its design, the platform had integrated processes for selecting, prioritizing and translating participatory inputs into potentially actionable administrative outputs.

This picture is also confirmed by the empirical traces preserved through archival material – since the website in question ceased to be accessible in 2025. From the content

accessible via the archived site on the Internet Archive⁸, it appears that the platform's substantive activity is primarily concentrated in the period 2010-2012. This discrepancy between the long-term technical presence of the website and the comparatively brief period of actual content renewal constitutes an initial trace of the problem examined here: the technical survival of a digital infrastructure is not identical to its administrative, organizational or institutional vitality. The platform appears to have had a real lifecycle as a tool for participatory innovation, but the intensity of this function was temporally limited.

However, the analytical value of Labs.OpenGov.gr lies not only in the initial mobilization but primarily in the quality of the proposals produced. Available examples demonstrate that the ideas submitted were neither superficial, generic nor exclusively technological. In the 3rd phase, centered on the theme of combating bureaucracy, proposals such as the "Creation of an Electronic Bank of Prototype Documents (e-gov bank)" and the "Redesigned Process for Establishing a Limited Liability Company" were presented, both of which were actually awarded within the WeGov⁹ framework. The significance of these examples is twofold: on one hand, they suggest that the project generated contributions that received public recognition; on the other, they show that idea generation was not exhausted by applications or software but included substantive proposals for administrative and institutional redesign.

This finding is further reinforced by other proposals that remain remarkably relevant today. The archived platform includes, among others, a proposal for "Electronic Justice", which as early as 2012 described the interconnection of judicial and related services for the electronic movement of case files, aimed at reducing delays, consumables and administrative burden. Similarly, a proposal can be found for the recording and utilization of state-owned real estate, an issue that continues to occupy public discourse even today. In the same vein is the proposal for electronic payments through the establishment of the electronic fee (e-paravolo), which had even been presented at a relevant workshop. The interest in these examples does not lie in proving that subsequent reforms originated directly from Labs.OpenGov.gr, as such a causal link is difficult to document adequately. Their true significance lies in revealing the administrative maturity, acumen and enduring utility of a large portion of the proposals generated within the platform.

This point is decisive for the interpretation of the case. It is clear that Labs.OpenGov.gr cannot be interpreted as a hollow or initially dormant digital infrastructure. There was participation, there were evaluation processes, there were public presentations, there were awards and there were proposals that, even fifteen years later, appear apt and substantive. Precisely because of this, its analytical inclusion in the category of ghost platforms is not based on a finding of low usage or a lack of interest, but on a deeper level regarding the weak traceability of the transition from outputs to outcomes. Based on the available evidence, there is no clear documentation of a stable and institutionalized mechanism linking the submitted proposals to further administrative processing, implementation, documented rejection or feedback to the participating community. The process of submission, selection and presentation is visible; the continuity of that path is far less so. There is no sufficiently discernible permanent proposal-to-implementation feedback loop

⁸ See https://web.archive.org/web/20260000000000*/labs.opengov.gr

⁹ See <https://web.archive.org/web/20121022173056/http://labs.opengov.gr/hmerida3>

– a mechanism through which participatory idea generation would be transformed into a steady administrative circuit of learning, decision-making and execution. At this juncture, the political context becomes decisive: Deligiannis and Peristeras emphasize that the long-term effectiveness of such ventures requires timely formal integration into administrative structures, and that project-based or ad hoc schemes tend to be short-lived under conditions of political turnover or intense bureaucratic resistance (Deligiannis & Peristeras, 2025). Labs.OpenGov.gr appears to confirm exactly this pattern.

At this point, the connection to the theoretical framework of the study becomes clearer. The case of Labs.OpenGov.gr confirms mechanisms of institutional decoupling, in the sense that the existence of a technically active and socially visible infrastructure was not accompanied by a correspondingly clear institutional consolidation as a permanent administrative mechanism. Furthermore, as previously mentioned, it illuminates the discrepancy between outputs and outcomes, since the platform produced a wealth of substantive ideas, comments, discussions and workshops without an equally strong documentation of the transformation of these outputs into stable, traceable and institutionally secured results of public value. The recent article on the Greek e-government team is particularly useful here as well, highlighting that in some of the initiatives of that period, impact assessment remained difficult precisely due to the absence of official evaluation metrics (Deligiannis & Peristeras, 2025). In the case of Labs.OpenGov.gr, this difficulty is compounded by the dependence on a specific political and organizational environment.

Viewed in this light, OpenGov Labs offers a characteristic example of a mature ghost platform. The case shows that a platform can display high initial participation, public visibility and substantive contributions, yet remain institutionally fragile when it lacks permanent administrative anchoring and when its operation depends excessively on a specific political cycle. In this sense, the case of Labs.OpenGov.gr contributes to the understanding of ghost platforms as a category where technical abandonment itself is merely the symptom. The root causes are found in the limited institutional capacity to transform participatory energy into administrative memory, organizational continuity, measurable results and, ultimately, public value (Twizeyimana & Andersson, 2019).

Case Study: Ghana Open Data Portal

The case of the Ghana Open Data Portal offers significant analytical interest for the study of ghost platforms, as it concerns an initiative that launched with substantial international support, institutional visibility, and an explicit ambition to build a sustainable open data ecosystem. The Ghana Open Data Initiative (GODI) was developed following feasibility studies organized by the World Wide Web Foundation for Ghana, Chile, and Turkey, with funding provided by the Omidyar Network and the Open Society Institute via the Transparency and Accountability Initiative. As early as 2011, the Web Foundation emphasized that the goal was not merely the creation of a website, but the formation of a locally sustainable open data ecosystem, estimating a favorable combination of government willingness, civil society interest, and technological infrastructure (World Wide Web Foundation, 2011).

The institutional and political weight of the venture was further strengthened when the National Information Technology Agency (NITA) officially inaugurated GODI in January 2012, creating a central data repository from 25 public bodies, including the

Ghana Statistical Service, the Energy Commission and the Ministry of Finance. The World Bank notes that the Web Foundation's feasibility study had already identified political will on the part of the government for greater transparency. Consequently, a Steering Committee was formed with representatives from the government, the NITA Board of Directors, the Ministry of Communications and civil society organizations (World Bank Group, 2019). The portal was thus linked to a broader narrative of digital transformation and open government.

The significance of this case is further reinforced by the fact that the portal was included in Ghana's 2nd National Action Plan under the Open Government Partnership for the 2015–2017 period. The relevant commitment, titled "Ghana Open Data 2.0", envisioned improving the effectiveness of the data.gov.gh portal, strengthening the data collection and management capabilities of data controllers, developing data standards, organizing capacity-building workshops, uploading 50 datasets with business value, conducting hackathons and creating an impact monitoring system (Open Government Partnership, 2017). In other words, the state did not view the portal merely as an information repository, but as the hub of a dynamic ecosystem connecting public bodies, research institutions, entrepreneurs, journalists, developers and civil society organizations.

Precisely because of these high ambitions, the subsequent functional decline of the portal carries particular weight. The Africa Regional Report of the Open Data Barometer recorded that, during the research period, Ghana's open data catalog was inactive or inaccessible for extended periods and that most relevant datasets could not be located elsewhere on government websites (World Wide Web Foundation, 2016a). The same report emphasized that the inability to access government data was a decisive factor in the country's low performance regarding open data policy implementation in 2015. Furthermore, the failure to inform users about the reasons for data unavailability or the estimated time for restoration undermined user trust in the state as a reliable data provider (World Wide Web Foundation, 2016a). This observation is noteworthy because it shows that the portal's decline consisted not only of a lack of updates but also of a broader breach of credibility regarding the public digital infrastructure itself. Naturally, as this is an open data platform, phenomena previously examined (see the subsection on Data Washing / Obfuscation) are also identified here, such as Technical Obstruction and Temporal Openwashing.

The most systematic analysis of GODI's performance comes from the study by Bankuoru Egala and Afful-Dadzie, who examine the initiative through the lens of fit-viability theory. Their conclusion is quite stark: the architecture of the Ghana Open Government Data Initiative was far from being considered both fit-for-purpose and sustainable in the long run (Bankuoru Egala & Afful-Dadzie, 2022). They explicitly state that the initiative's performance was sluggish due to a complete lack of synergy among various stakeholder groups, a lack of sustainable financial support for the implementing body, a shortage of adequately trained staff and the partial neglect of the project in favor of a newer endeavor, the eTransform project (Bankuoru Egala & Afful-Dadzie, 2022). This finding is valuable because it shifts the interpretation from a narrow technical description of inertia to a deeper diagnosis of organizational and ecosystemic failure.

The authors document specifically how this failure manifested in practice. They report that NITA failed to publish updated datasets and that, at the time of their research, the web portal had become effectively obsolete, with little to no updates of existing datasets. They

link the decline in daily visits and file downloads directly to the fact that the published data no longer met user expectations precisely because it was outdated (Bankuoru Egala & Afful-Dadzie, 2022). Furthermore, they highlight that data controllers within various state agencies had not received sufficient training, technical guidelines for data generators were absent, and this deficiency led to the production of data in non-machine-readable formats, thereby limiting the portal's usability and compatibility with international open data standards (Bankuoru Egala & Afful-Dadzie, 2022).

The World Bank confirms and complements this picture in an equally eloquent manner. In the Digital Economy for Ghana Diagnostic Report, it is noted that while the data available through data.gov.gh was legally "open" according to international standards, it was largely outdated, and some of it remained in non-machine-readable formats (World Bank Group, 2019). The report also points out that there was no established data collection process between the contact points of ministries, departments, agencies and GODI; instead, data officers had to collect data separately from each entity. As a result of this institutional and functional discontinuity, the World Bank concludes that GODI had not fully met its primary objectives by 2019 (World Bank Group, 2019). This observation is pivotal, as it demonstrates that legal openness is insufficient when not accompanied by stable administrative data flows, clear standards, continuous updating and organizational coordination.

The dimension of funding and institutional support is equally significant. Egala and Afful-Dadzie note that the project's steering committee was inadequately constituted, oversight was ineffective and management failed to secure substantive political approval from the government center – specifically, cabinet buy-in. Furthermore, they emphasize that GODI was burdened by a lack of sufficient funding from the central government, which in turn hindered training, the organization of frequent public engagements with stakeholders and the maintenance of necessary technical support. On a broader level, the authors warn that many African open data initiatives depend on donor agencies due to a lack of sustainable domestic self-funding sources; consequently, when external resources are exhausted, the program is suspended almost automatically (Bankuoru Egala & Afful-Dadzie, 2022). The Ghana Open Data Initiative thus emerges not only as an example of technical retreat but also as an example of weak fiscal and institutional sustainability.

The case of Ghana is particularly interesting because it did not follow a strictly linear path of abandonment. The commitment in Ghana's OGP Action Plan for 2015-2017 recorded ambitious goals for upgrading the portal, yet the Independent Reporting Mechanism (IRM) noted that implementation was limited. The relevant report highlights that many milestones were either delayed or suspended, while a lack of sufficient information from NITA hindered even the assessment of progress (Open Government Partnership, 2017). Furthermore, it is noted that several actions were rescheduled to accelerate work within the framework of the World Bank-funded eTransform project. This implies that GODI did not simply vanish; it was periodically reintegrated into new plans and reform narratives without ever resolving its underlying organizational weaknesses. Of course, it is also worth noting that this picture does not mean the Ghanaian open data ecosystem produced no public value at all; on the contrary, it has been argued that certain results were visible in sectors such as agriculture, citizen empowerment, quality of life and accountability (Nuhu & Belle, 2019). However, this value was limited, sectoral, and often mediated by intermediaries, without a corresponding demonstration of the portal's own stable capacity

to function as a persistent state mechanism for public value production (Nuhu & Belle, 2019).

Viewed in this light, the Ghana Open Data Portal constitutes another characteristic case of a ghost platform. Its significance lies not only in its start with international support and formal institutional backing but in its revelation of a specific form of institutional failure: the inability to establish a sustainable data ecosystem. The problem transcends low portal usage or the lack of third-party output utilization, highlighting the state's own difficulty in systematically producing, standardizing, updating and circulating the data that should feed the infrastructure. The Ghana Open Data Portal can therefore be interpreted as a case where initial international legitimacy and formal political inclusion were not accompanied by sufficient organizational capacity, stable funding, clear data pipelines and institutional cooperation between the implementation body, data generators and data users. It is precisely this discrepancy between ambition and sustainability that makes the Ghana case so useful for understanding ghost platforms in public administration.

5. From Comparative Synthesis to the Diagnostic Framework

5.1 From Typology to the Synthesis of Findings

Chapter 4 developed a typology of the empirical forms of opengov washing across five core categories: data washing/obfuscation, institutional/compliance washing, participation washing, transparency washing and ghost platforms. This typological distinction was deemed necessary as it allowed for a clear depiction of the different facets of pretextual openness and highlighted the specific ways in which the appearance of transparency, participation or accountability can become decoupled from substantive political and administrative practice. In the present subsection, however, the inquiry shifts to examining the picture that emerges when the cases are read comparatively and synthetically, highlighting the transversal logics that connect them.

A comparative reading of the cases indicates, first of all, that openness is most frequently observed as an institutionally recognizable form rather than an integrated administrative practice. This trend appears with particular clarity in cases of institutional washing, where the passage of a law or the establishment of an institution immediately produces the signal of reform without ensuring a corresponding scope of implementation (as seen in the Transparency Register with its significant underperformance, the whistleblower legislation which emerges as narrow and operationally weak, or the Irish DPC case with its limited range of audits).

However, the same logic is not limited to the legal level. It reappears when openness takes the form of a digital or informational infrastructure without acquiring corresponding organizational integration or functional utility, as occurs with Diavgeia through its PDF files and incomplete metadata, or with ghost platforms, where the technical existence of a platform is not accompanied by stable integration into administrative workflows. The common denominator is that reform becomes more easily visible as a form of symbolic compliance rather than as a change to the administrative core.

A second transversal pattern concerns the systematic production of visibility without an equivalent accountability value. In different typologies of Chapter 4, information or data is formally disclosed, but the very format, structure or timing of the publication decisively restricts the ability of oversight and substantive utilization. In the field of data washing and obfuscation, this is reflected in data that is available but practically unusable or insufficiently reusable (as seen in Diavgeia, the European Open Data Portal, or pandemic data deemed insufficient for independent scientific verification). In the field of transparency washing, the same logic takes a more institutional form: publicity is provided, but not in a way that directly strengthens social or institutional oversight, whether due to a time lag (as in asset declarations), fragmentation (as in KHMDIS/ESHDHS), or excessive information redaction (as in "FOIA Redactions"). Thus, the comparative synthesis of sections 4.1 and 4.4 shows that symbolic openness arises not only when information is concealed, but also when it is provided in such a way that it remains institutionally visible but accountably weakened.

The same comparative reading also shows that in many cases the primary problem is not the absence of open channels, but the absence of institutional response and organizational integration. Cases of participation washing capture this exact point: citizen participation is permitted, their opinion is recorded, and the entry channel exists, but there is no clear

chain of processing, justification and impact on the final decision (as in public service evaluations that remain at the level of numerical scales, without practical utility for the public bodies receiving this feedback).

Correspondingly, in ghost platforms, the digital infrastructure may be designed, purchased or put into operation, but there is no institutional "ownership" – meaning no responsible unit, workflow or administrative continuity to transform it into a real institution. From this perspective, the distance between participation washing and ghost platforms is smaller than the typological distinction suggests: in the former, there is "voice" without mechanisms for listening and response; in the latter, there is technical infrastructure without corresponding organizational activation. In both cases, openness offers a visible entry point without being transformed in a process with a substantive outcome.

A further critical finding, which becomes clearer only when the individual typologies are read together, concerns the temporal dimension of pretextual openness. The weakening of openness is not manifested only at the moment of design, but also along the axis of time. In some cases, the accountability value of information is limited because it becomes usable slowly or with such a delay that it weakens its utility, as in the case of asset declarations. In others, the institution is established but shows significant underperformance over time, as in the case of the Transparency Register. In some others, a platform is launched with visibility but is followed by gradual inertia, abandonment or obsolete content, as seen in the e-Dialogos platform of the Saronikos Municipality, Labs.OpenGov or the Ghana case. Temporality, therefore, appears to be a core dimension of the phenomenon: many openness initiatives initially appear as reformative outputs, without, however, acquiring the continuity, maintenance and long-term functionality required to produce substantial outcomes in terms of accountability and public value.

All the above findings converge on a broader conclusion: the different forms of opengov washing do not simply correspond to isolated failures of transparency, participation or accountability, but to recurrent discrepancies between the production of forms of openness and the achievement of substantive administrative results. Sometimes this discrepancy takes the form of symbolic institutional compliance, sometimes the form of visibility without the possibility of oversight, sometimes participation without response, and other times a technical infrastructure without organizational integration or temporal resilience. In all cases, however, the fundamental difference lies between the existence of a visible output and the absence of a corresponding outcome that genuinely alters the relations of accountability, trust, participation or administrative learning.

5.2 Common Mechanisms of Opengov Washing

If the previous subsection highlighted the individual manifestations of opengov washing when viewed comparatively, this section attempts to identify the recurring mechanisms that produce this comparative picture, organized using a clearer analytical vocabulary. These mechanisms function as overlapping dimensions of the same phenomenon and illuminate different facets of the same cases.

The first such dimension is symbolic compliance and institutional decoupling. This mechanism pertains to cases where openness is adopted primarily as a recognizable form of compliance with institutional expectations, without this adoption being accompanied by an equivalent implementation intensity or organizational change. At the level of laws

and institutions, this is reflected in tick-the-box reforms or in regulatory frameworks that remain operationally weak, such as the Transparency Register with its low activation, the whistleblower legislation, which is analyzed as extremely narrow or as an "empty shell", or the Irish DPC case where conflicts of interest and the revolving doors phenomenon undermine effective enforcement. However, the same mechanism is not limited to the regulatory level. On the contrary, it reappears when the technological or informational form of openness exists formally, but does not penetrate the functional core of public administration. In this sense, decoupling concerns not only "law without enforcement" but, more broadly, a reform that acquires a primarily symbolic character – without this implying, of course, that every operational weakness or delay automatically constitutes symbolic compliance.

The second dimension is visibility without accountability. Here, the information, data, or transparency footprint becomes formally available, but in a way that restricts the possibility of substantive reuse, auditing, or direct accountability. This logic is already evident in cases of data washing, where publication in PDF format, incomplete metadata, or the lack of context creates a form of apparent openness without substantial operational utility. The same logic runs through transparency washing: in asset declarations, the information is disclosed, but with such a time lag that its accountability value is severely diminished; in KHMDS/ESDHS, the prolonged period during which information existed in a fragmented form – lacking a public API and unable to be easily transformed into a coherent oversight picture – demonstrated that mere posting is insufficient for social control; and in FOIA redactions, the excessive withholding of content practically strips the access of its substantive meaning. Thus, this constitutes a form of weakened or controlled publicity: sufficient to support the invocation of transparency, but not enough to produce full accountability.

The third dimension is technological implementation without organizational integration. In this case, the existence of a digital tool or platform produces the image of functional openness, while in practice, the elements that would make it a stable administrative mechanism are missing: institutional ownership, workflows, an administrative footprint, continuity in maintenance and linkage to decision-making processes. This dimension emerges primarily in ghost platforms, but its significance is much broader. It illuminates a frequent logic of opengov washing whereby technology operates as a substitute for institutionalization: the platform is installed, presented and operated without the administration transforming itself accordingly to utilize, maintain and integrate it. Thus, the technical existence of the infrastructure acquires value primarily as an output, rather than as an organizationally capable condition for the production of public value.

The fourth dimension is participation without institutional uptake. This specific formulation captures the problem more accurately than the narrower concept of "responsiveness", because it concerns not only whether the administration "replies", but whether there is an institutional mechanism to receive, process, document and translate the inputs into decision-making. In participation washing, this is clear: the formal opportunity to participate is not accompanied by a feedback loop, an authority linkage, or amendment traceability. The case of the consultation on waste management and the evaluation of public services – which is limited to a likert scale without translating into actionable insight – captures precisely this gap between the existence of an input and its institutional utilization. The same analytical framework, however, can also illuminate cases where a participatory infrastructure exists but the administrative process itself does

not even reach the point of substantive activation. In this sense, the lack of institutional uptake is a problem not only of traditional consultations but, more broadly, of forms of openness that provide an entry point without reliably converting the input into an administrative act.

The fifth dimension is the fragility of the digital infrastructure's lifecycle. Here, the focus is not merely on whether an initiative existed, but whether it endured over time, withstanding the rotation of political cycles and administrative priorities as well as the daily demands of maintenance. Performative openness thus acquires a temporal dimension: the action is announced, launched and/or heavily promoted, but it lacks longevity and does not stabilize as an institution. In ghost platforms, this logic is most evident, whether in cases of cessation of operation and lack of users or in platforms that were gradually allowed to become inactive. However, lifecycle fragility is not limited to platforms. On a broader level, it is also linked to cases where institutional activation remains extremely low over time or where information becomes available so belatedly that its accountability power erodes. This temporal fragility is crucial because it demonstrates that the failure of openness is not only a matter of initial design but also of institutional resilience.

These five dimensions systematically overlap with one another. Symbolic compliance can take the form of visibility without accountability, when mere publicity is sufficient to produce the image of transparency without facilitating full oversight. Technological implementation without organizational integration often intersects with participation without institutional uptake, when a participatory channel or platform exists without being linked to processing, documentation and decision-making workflows. The fragility of the lifecycle reveals in time the same problem that the other dimensions demonstrate in structure: that openness has been produced as a visible output, without acquiring sufficient institutional robustness to be translated into a stable outcome. This is why the aforementioned mechanisms should be viewed not as distinct types, but as multiple sides of the same coin.

It must be emphasized, however, that these mechanisms are not identical to every form of weak or imperfect implementation. In this study, pretextual openness describes cases where openness is maintained primarily as a visible output, without a corresponding deepening of accountability, organizational integration or public value. Symbolic compliance constitutes one of the core mechanisms through which this image is produced. A technical implementation failure or the structural constraints of a public body – such as a lack of human resources or administrative inertia – may have a different analytical interpretation. The former refers to execution failures of an initiative, whereas the latter relates to organizational and administrative conditions that often feed these failures, without necessarily implying deliberate pretense.

This distinction is critical because it allows the separation of the evaluative level of the analysis from the interpretive one. The authenticity or pretextual nature of an open government action cannot be inferred either from the stated intentions alone or from the reasons cited by an entity for its adoption; rather, it must be evaluated through the institutional, organizational and accountability traces of its implementation. Correspondingly, the explanation of these findings may point sometimes to symbolic compliance and other times to administrative or organizational constraints. This distinction is even more necessary when considering that the literature itself shows that

state commitments to open government are rarely articulated through a single, clear motive, but are often constituted through overlapping repertoires of coercion, imitation, attraction and competition, which combine instrumental, normative and legitimizing logics (Lee-Geiller et al., 2026).

Continuing, a brief application of this overlap of dimensions, as an example, can be seen in the case of the Saronikos Municipality Participation Platform. This specific case is not merely another example of a ghost platform, even though it was presented as such. As the analysis in Chapter 4 shows, this is a platform that was initially associated with public promotion, but its documented activity was limited to only two consultations, with extremely low to zero participation, without the activation of the platform's other functions, without an administrative footprint, and with a cessation of operation within a timeframe of less than two years. Already from this sequence, it becomes clear that this very case illuminates more than one mechanism: technological implementation without organizational integration, participation without institutional uptake, and the fragility of the lifecycle. Precisely this convergence of dimensions prepares the next step of the analysis, which is the systematic clarification of the institutionalization gap.

5.3 The Institutionalization Gap and the Public Value Deficit

In this subsection, a further systematic analytical step is taken: identifying the point at which openness initiatives lose their institutional intensity and move away from producing substantial outcomes. The question here is no longer simply which mechanisms appear, but exactly where the path "breaks" – from the announcement or installation of an open government tool to its actual functioning as an institution. In this study, this point of discontinuity is described as the institutionalization gap: the gap between the formal existence of an openness initiative and its actual integration into administrative workflows, accountability relations and measurable public value outcomes. This concept is in direct dialogue with the research methodology, which is defined as the identification of discrepancies among promise, implementation and outcome, as well as with the concept of accountability gaps as points where the official declaration of openness is not accompanied by verifiable accountability.

The institutionalization gap can be depicted as a sequence of stages through which an openness initiative attempts to move from a political or administrative announcement to its substantive operation. These key stages can be outlined as follows:

- 1) Announcement,
- 2) Technical Deployment,
- 3) Organizational Embedding,
- 4) Public Uptake and
- 5) Policy Impact.

The significance of this sequence is that it allows us to pinpoint with greater precision the level at which the promise becomes decoupled from practice. In some cases, the initiative proceeds as far as the technical installation but never reaches organizational embedding; in others, it acquires some organizational form but does not transition to the stage of social use or institutional utilization; and in others, there may be use or publicity without a corresponding impact on accountability, administrative learning or public policy in general.

The value of this sequence becomes evident precisely because it allows for a combined reading of cases that were presented separately in the typology of Chapter 4. In ghost platforms, for example, the discontinuity appears primarily between technical implementation and organizational embedding: the platform exists, but it is not accompanied by administrative ownership. In participation washing, the rupture tends to be located between the existence of a participatory channel and the actual institutional uptake of the input, that is, between an initial form of public uptake and its translation into substantive processing or impact on policy formulation. In transparency washing and in aspects of data washing, the information may be formally available at a relatively early stage, but the possibility of substantive control is restricted either at the level of usability or at the level of time, format, or reusability. Thus, the institutionalization gap does not describe a single failure, but a set of potential points of discontinuity within a process that typically begins as an exercise in openness but very often fails to culminate in institutional change.

The existence of this gap is not accidental. The analysis of the case studies has already revealed several key structural drivers of the institutionalization gap: political incentives, communicative pressure, legislative compliance, a lack of administrative capacity and one-off funding. These factors do not operate in isolation, but as an incentive environment in which openness is more easily produced as a visible and politically exploitable output rather than as a long-term administrative investment. Political and communicative incentives favor announcements, visibility during the "launch" phase, and the rapid production of reform symbols. The need to comply with European Directives, Regulations, or other rules of law often reinforces the formal adoption of tools or rules without guaranteeing their full operational maturity. Weak administrative capacity limits the likelihood of the initiative achieving permanent embedding, clear distribution of responsibilities and stable monitoring. Furthermore, one-off funding favors solutions of short-term visibility without a permanent maintenance structure. Viewed in this light, the institutionalization gap is not merely an issue of "poor" implementation; rather, it often expresses a deeper tension between the logic of political demonstration and administrative institutionalization.

At this exact point, the institutionalization gap is directly linked to the public value deficit. Public value theory offers the critical criterion here for distinguishing between outputs and outcomes. A platform, a law, a consultation, a data publication or a transparency institution certainly constitute outputs; however, they are not sufficient on their own to document that public value has been produced. For this to happen, the initiative must lead to a substantial improvement in accountability, trust, administrative responsiveness, reusability, participatory influence or the quality of public policy. The institutionalization gap explains precisely why the transition from output to outcome fails so frequently in the cases of Chapter 4: not because there is no visible action, but because this action does not acquire the organizational, temporal and accountability intensity required to produce a measurable result.

This connection also illuminates something else: the "public value deficit" should not be viewed as a mere "consequence" of the institutionalization gap, but as its normative and evaluative counterpart. The institutionalization gap describes where and how institutionalization fails; the public value deficit shows what is lost as a result of this failure. When a platform is not organizationally integrated, it is not only a technical capability that is lost; the possibility of it transforming into a stable channel for

administrative learning or polyphonic input is lost as well. When a data or document publication is formally open but practically unusable, not only is the utility of the information lost, but also the potential for independent oversight. When a consultation permits participation without institutional uptake, we are not simply dealing with an imperfect procedure; we are facing an inability to produce public value in terms of trust, legitimization and substantive participation. From this perspective, the institutionalization gap is the mechanism through which openness outputs fail to convert into substantive outcomes in terms of public value.

The institutionalization gap thus acts as the unifying interpretive schema of the chapter, transforming the mechanisms from the previous subsection into comparable points of discontinuity between formal openness and its substantive institutionalization. In this way, it becomes clear that the chapter develops across three successive yet interrelated levels: the mechanisms of opengov washing explain how performative openness is produced, the institutionalization gap shows where this pretense manifests as a discontinuity in the institutionalization process, and the Opengov Authenticity Framework (OAF) that follows attempts to show how it can be evaluated. These three categories do not correspond to each other mechanically, as the mechanisms function as generative logics that can influence more than one stage, while the dimensions of the OAF emerge from their translation into evaluative criteria. Thus, the interpretive synthesis of the chapter can now be transformed into a set of diagnostic questions: Is there real implementation beyond the law? Is there organizational embedding? Is there administrative responsiveness or a feedback mechanism? Is there institutional continuity? Is a measurable outcome produced? From this point emerges the next step of the analysis: the systematic construction of a framework for evaluating authenticity.

5.4 Opengov Authenticity Framework - OAF

This subsection takes another decisive step: it proposes a diagnostic evaluation framework. The inquiry now shifts from how opengov washing manifests or which mechanisms produce it, to the question of what criteria can be used to distinguish an authentic open government action from a pretextual one. At this point, the Opengov Authenticity Framework (OAF) is introduced as a tool derived from the empirical synthesis of the case studies, the codification of the common mechanisms of washing and the interpretive function of the institutionalization gap. The purpose of the OAF is not to function as a denunciatory or moralizing scheme, but as a framework for the systematic diagnosis of the distance between the appearance of openness and substantive openness. In this way, the OAF directly answers the study's second research question, which asks for the identification not only of the mechanisms of divergence but also of the criteria through which this divergence can be systematically evaluated.

5.4.1 Conceptual Foundations of the Opengov Authenticity Framework

The OAF is grounded in three interrelated foundations. First, it emerges from the empirical mapping of Chapter 4 and the interpretive synthesis presented earlier in Chapter 5. The case studies revealed recurring discrepancies between institutional form and functional practice, between visibility and accountability, between technical deployment and organizational embedding, between inputs and institutional uptake, and between initial visibility and temporal resilience. Second, the OAF relies on public value theory, insofar as it considers that the authenticity of an open government action is not exhausted

by the existence of outputs – laws, platforms, consultations, datasets – but is judged by whether these are transformed into outcomes of accountability, trust, administrative learning and substantive impact. Third, the framework is in dialogue with institutional theory, and specifically with the concept of decoupling, as the goal is to diagnose when openness operates as a symbolic form of compliance and when it is a real institutional practice.

Viewed in this light, the Opengov Authenticity Framework is not proposed as a tool that mechanically divides open government initiatives into "good" and "bad". Instead, it seeks to offer a grid of diagnostic questions through which the degree of institutional authenticity of an openness action can be evaluated. Therefore, the emphasis is not placed on the political intent of the actors, but on the verifiable technical, organizational and institutional traces left by an initiative when it is substantively integrated. From this perspective, the OAF can be utilized by different audiences: by researchers seeking a comparative evaluation of cases, by public organizations wishing to assess their own interventions, and by citizens or civil society organizations needing a clearer vocabulary to distinguish authentic openness from pretextual openness.

5.4.2 Dimensions of Authenticity

Based on the preceding findings, the OAF is organized around six core dimensions of authenticity. The number of dimensions is the result of a comparative and inductive synthesis process of the fifteen case studies. Those patterns that appeared repeatedly in more than one category of cases emerged as separate dimensions, captured distinct aspects of the institutionalization gap, and could be translated into operational, positively formulated evaluation criteria. Thus, these dimensions are analytically distinct not because they are fully independent, but because each illuminates a different facet of the same overall evaluative approach. In its current form, the OAF is organized around the following six dimensions:

- 1) Usability and Accessibility,
- 2) Reusability and Functional Openness,
- 3) Administrative Responsiveness,
- 4) Organizational Embedding,
- 5) Institutional Continuity and
- 6) Measurable Impact.

The first dimension is Usability & Accessibility. The first question the OAF asks is whether the openness initiative is practically accessible and usable. The existence of a tool or a dataset is not sufficient if its format makes its use difficult or limited. From the empirical analysis of data washing, it becomes clear that the authenticity of openness is undermined when access exists only formally – such as in PDF files, cumbersome information structures, or platforms that function more as repositories rather than functional tools. Therefore, an authentic openness action must be not only visible but also substantially usable by those it addresses.

The second dimension is Reusability / Functional Openness. Here, the question is not only whether the information is accessible, but whether it produces functional value: whether it can be analyzed, verified, reused and integrated into secondary uses for oversight or knowledge. This dimension is directly connected to cases where formal openness does not equate to a real possibility of utilization, such as in data portals without context or APIs,

or in data that lacks adequate metadata. Functional openness, therefore, constitutes a more demanding criterion than simple publication: it examines whether openness has been designed to enable use rather than simply fulfilling the obligation to post information.

The third dimension is Administrative Responsiveness. This dimension examines whether there is a feedback loop between the input of information or participation and the administrative response. It is the positive counterpart to participation washing: it is not enough to simply have the opportunity to comment, evaluate or participate; it must be documented that the administration receives, processes and, where appropriate, translates this input into a reasoned response, modification or institutional adjustment. In OAF terms, an authentic openness action must have traceability between the citizens' voice and the way this voice influences, or is at least taken into account in administrative practice.

The fourth dimension is Organizational Embedding. This examines whether the initiative is integrated into workflows, responsibilities and administrative procedures. This is the primary point at which the OAF dialogues with the institutionalization gap. An action can be technically sound, visible and even popular, but still remain fragile or superficial if it lacks administrative ownership, in the sense of a responsible unit, internal communication procedures and a clear position within the administrative organizational cycle. This dimension is pivotal, as it allows us to distinguish between truly institutionalized infrastructures and technically existing but organizationally floating platforms.

The fifth dimension is Institutional Continuity. The authenticity of openness is not judged solely at the moment of an initiative's launch, but also by its ability to survive political cycles, administrative changes and maintenance pressures. This dimension addresses the lifecycle fragility that was highlighted particularly in ghost platforms, but also more broadly in cases where openness remains under-activated or loses its value over time. If a platform, an institution, or a publication does not maintain its functionality, if it lacks a maintenance mechanism, and if it depends exclusively on circumstantial political support or one-off funding, its authenticity remains precarious.

The sixth dimension is Measurable Impact. This dimension encapsulates the OAF's connection to public value theory more than any other. The critical question here is whether the openness action produces a measurable outcome and not just a visible output. Does it genuinely enhance accountability? Does it improve oversight capability? Does it influence administrative learning or policy formulation? Does it allow for more substantive participation or reusability? With this dimension, the OAF moves away from a strictly formalistic assessment of openness and shifts toward a more demanding evaluation of whether openness generates social and administrative value. It is precisely here that the previous five dimensions converge: usability, reusability, responsiveness, integration and continuity acquire their full meaning only when they contribute to the creation of a recognizable outcome.

The current six-dimensional configuration of the OAF is considered, within the scope of this research, to be sufficiently compact and analytically functional, because these six patterns were the most recurring, the most clearly distinct and the most suitable for translation into evaluation criteria. For the same reason, it must also be clarified that the six dimensions of the OAF do not constitute a linear scale of progress nor a scheme of necessary succession, but a multi-dimensional diagnostic grid through which different facets of an open government initiative's authenticity are evaluated.

These dimensions are interrelated, yet they retain their analytical autonomy, as each captures a different control point of authenticity: some focus on the techno-functional properties of an initiative, others on its administrative and organizational processing, others on its longevity, and others on the resulting outcome. In this sense, they exist in a relationship of interaction and partial interdependence, without, however, being logically identical, nor always presupposing the full existence of one another, nor being activated with the same intensity or the same degree of centrality in every open government initiative.

5.4.3 Authentic vs Performative Matrix

Based on the aforementioned dimensions, the OAF can be depicted in a summary matrix distinguishing between authentic and performative openness. The following table does not function as a strictly binary classification, but as a tool that clarifies what a more institutionalized and publicly useful form of openness means in each individual dimension, and what, on the contrary, constitutes a performative version of it. With this logic, the distinction between authentic and performative openness does not concern political intentions, but verifiable technical, organizational and institutional traces.

Dimension	Authentic	Performative
Usability and Accessibility	The information or the platform is practically accessible, comprehensible, and functional for the end user. Its use does not require special technical expertise, specific mediation, or excessive effort.	Access exists primarily on a formal level. The information is cumbersome, fragmented, or technically inaccessible, with the result that "openness" exists more as a declaration than as a real possibility for use.
Reusability and Functional Openness	The data or records are reusable, analyzable, and suitable for independent verification, interoperability, and secondary use.	Publication is limited to formal posting. The data is not substantively editable, does not support verification or reuse, and is not easily converted into functional knowledge or accountability oversight.
Administrative Responsiveness	There is a clear feedback mechanism between input and administrative response. Participation, evaluation, or the submission of data leaves a trace of processing, justification, or adjustment.	The administration collects inputs without clear institutional uptake. The citizens' voice is recorded, but is not demonstrably linked to processing, response, or the alteration of the final decision.
Organizational Embedding	The initiative is integrated into workflows, responsibilities, internal procedures, and administrative practices. There is ownership and a functional position within the organization.	The action remains organizationally suspended. It exists as a tool, platform, or process without a clear responsible unit, without daily use, and without a stable

Dimension	Authentic	Performative
		connection to the administrative cycle.
Institutional Continuity	The initiative endures over time, political leadership changes, and variations in priorities. It has continuity, maintenance, and institutional resilience.	The action exhibits a strong start but low duration. It depends on circumstantial political support, one-off funding, or communicative dynamics, and ends in inertia or abandonment.
Measurable Impact	Openness is linked to a recognizable result: the strengthening of accountability, improvement of oversight, administrative learning, substantive participatory influence, or the production of public value.	Primarily visible outputs are produced—laws, platforms, publications, consultations—without sufficient documentation of a substantive effect on accountability, use, or public value.

Table 2: Authentic vs. Pretextual Openness Dimension

This table allows for a distinction to be made between an ad-hoc initiative and a substantive institutional reform. The more dimensions that are substantively met, the more an action approaches authentic openness. Conversely, the more openness remains at the level of formal availability, weak integration and the absence of a measurable result, the more it approaches a performative or pretextual form of openness.

5.4.4 Application Logic

The analytical usefulness of the OAF becomes clearer when applied, even if only indicatively, to one of the study's case studies. The Participation Platform of the Saronikos Municipality is a particularly suitable example, precisely because it does not highlight a single dimension of the framework, but rather a coincidence of multiple authenticity problems. The position of this case in the category of ghost platforms already indicates that the central problem was not merely low usage, but the inability to transform a technically available infrastructure into a functional institution with continuity, ownership and administrative consistency. In OAF terms, this means that the platform cannot be evaluated solely as a digital tool that either existed or did not exist, but as an initiative that must be examined simultaneously in terms of its usability, responsiveness, organizational embedding, institutional continuity and measurable impact.

With regard to Usability & Accessibility, the platform was formally available, but its documented operation did not show any substantive practical activation. With regard to Administrative Responsiveness, the case does not allow for the identification of a clear feedback loop or an administrative trace of converting any inputs into reasoned processing. With regard to Organizational Embedding, the inability to permanently integrate the platform into the entity's organizational workflows is precisely the point at which the case acquires the character of a ghost platform. With regard to Institutional Continuity, the short lifespan and lack of continuity show limited resilience over time. And finally, with regard to Measurable Impact, no documented result is produced in terms

of participatory influence, administrative learning or the production of public value. Consequently, this case demonstrates in practice what was theoretically argued in 5.2 and 5.3: that an initiative can exist as a visible output of openness without acquiring the organizational density, institutional continuity and functional effectiveness required to be considered authentic.

This indicative application shows that the OAF does not function as a simple checklist for formal compliance, but as a diagnostic grid that allows assessing exactly where an open government initiative remains superficial and in which dimensions it should be strengthened to be considered authentic. The value of the framework is precisely that it translates the theoretical analysis of opengov washing into a more systematic and comparable diagnostic logic. In this form, the OAF does not replace the detailed qualitative interpretation of the cases, but acts as a tool that allows the gathering of the study's key lessons into an evaluative scheme, useful for both analytical research and institutional or social use. Overall, the OAF acts as the point at which the chapter's interpretive synthesis is transformed into a comparable framework for evaluating the authenticity of open government actions.

In order to make the synthetic relationship between the typological material of Chapter 4, the mechanisms of opengov washing (highlighted in 5.2), the institutionalization gap (see 5.3) and the authenticity dimensions of the OAF (see 5.4.2) more visible, a summary mapping table of the fifteen case studies is presented below.

Case Study	Typological Category (Ch. 4)	Main mechanisms of opengov washing (5.2)	Main point of rupture in the institutionalization gap (5.3)	Main authenticity deficits based on OAF (5.4)
Diavgeia Program (Greece)	Data washing / obfuscation	Visibility without accountability; Symbolic compliance	4→5	Reusability / functional openness; Measurable impact
EU Open Data Portal	Data washing / obfuscation	Visibility without accountability	3→4	Usability / accessibility; Reusability / functional openness
Pandemic Open Data as a stress test	Data washing / obfuscation	Visibility without accountability; Symbolic compliance	3→4	Usability / accessibility; Reusability / functional openness; Measurable impact
Transparency (Lobbying) Register in Greece	Institutional / compliance washing	Symbolic compliance; Visibility without accountability	2→3	Organizational embedding; Institutional continuity;

Case Study	Typological Category (Ch. 4)	Main mechanisms of.opengov washing (5.2)	Main point of rupture in the institutionalization gap (5.3)	Main authenticity deficits based on OAF (5.4)
				Measurable impact
Whistleblower Legislation	Institutional / compliance washing	Symbolic compliance; Weak institutional integration	2→3	Organizational embedding; Institutional continuity; Measurable impact
Irish Data Protection Commission (DPC)	Institutional / compliance washing	Symbolic compliance; Visibility without accountability	4→5	Administrative responsiveness; Measurable impact
"No Listening" in the public consultation for waste management	Participation washing	Participation without institutional uptake; Symbolic compliance	4→5	Administrative responsiveness; Measurable impact
Evaluation of public services by citizens in Greece	Participation washing	Participation without institutional uptake; Implementation without integration	4→5	Administrative responsiveness; Organizational embedding; Measurable impact
Clifford Case in Great Britain	Participation washing	Participation without institutional uptake; Visibility without accountability	4→5	Administrative responsiveness; Measurable impact
Asset Declarations of elected officials	Transparency washing	Visibility without accountability; Symbolic compliance	4→5	Usability / accessibility; Measurable impact
KHMDIS / ESHDHS and public procurement	Transparency washing	Visibility without accountability; Implementation without integration	3→4	Usability / accessibility; Reusability / functional openness; Measurable impact

Case Study	Typological Category (Ch. 4)	Main mechanisms of opengov washing (5.2)	Main point of rupture in the institutionalization gap (5.3)	Main authenticity deficits based on OAF (5.4)
FOIA "Redactions" in the USA	Transparency washing	Visibility without accountability; Symbolic compliance	3→4	Usability / accessibility; Reusability / functional openness; Measurable impact
Saronikos Municipality Participation Platform	Ghost platforms	Implementation without integration; Participation without institutional uptake; Temporal fragility	2→3	Administrative responsiveness; Organizational embedding; Institutional continuity; Measurable impact
Labs.OpenGov Innovation Platform	Ghost platforms	Implementation without integration; Temporal fragility	2→3	Organizational embedding; Institutional continuity; Measurable impact
Ghana Open Data Portal	Ghost platforms	Implementation without integration; Visibility without accountability; Temporal fragility	2→3	Reusability / functional openness; Organizational embedding; Institutional continuity; Measurable impact

Table 3: Synthetic Case Study Mapping

Legend: Points of rupture in the institutionalization gap:

1→2: Announcement → Technical Deployment

2→3: Technical Deployment → Organizational Embedding

3→4: Organizational Embedding → Social Utilization (Public Uptake)

4→5: Social Utilization → Creation of Impact (Policy Impact)

It should be noted that this table does not function as a mechanical mapping or an exhaustive scoring system, but as a synthetic reading tool that captures, for each case, its primary typological inclusion, the main mechanisms it activates, the dominant point at which the institutionalization process seems to "stall" and the core authenticity deficits highlighted based on the OAF. In other words, the table serves as a visual and synthetic condensation of the chapter's interpretive journey.

6: Conclusions & Policy Recommendations for Countering Opengov Washing

This chapter gathers the main conclusions of the study and shifts the analysis from the level of empirical mapping and theoretical interpretation to the level of overall evaluation and the normative utilization of the findings. Since the preceding chapters highlighted the primary forms of opengov washing, the institutional and organizational mechanisms that produce it, the institutionalization gap that undermines the transition from outputs to outcomes, as well as the Opengov Authenticity Framework (OAF) as a diagnostic tool for evaluating the authenticity of open government actions, Chapter 6 attempts to summarize the overall contribution of the research and translate its findings into policy recommendations and areas for further investigation. In this spirit, the chapter is structured into three main subsections: the summary of the key empirical, interpretive and conceptual findings; the formulation of policy recommendations to avoid performative forms of openness in the future; and, finally, the evaluation of the limitations of the present study along with potential directions for future research.

6.1 Summary of Findings

If the preceding chapters demonstrated how opengov washing manifests, which mechanisms produce it and how it can be diagnosed through an evaluation framework (OAF), this subsection attempts to summarize what these findings mean overall for our understanding of open government and its performative versions. In this spirit, the following summary is organized around four axes: the empirical patterns that emerged, the institutional mechanisms that explain them, the diagnostic contribution of the OAF and, finally, the conceptual contribution of the term “opengov washing” itself.

The first key conclusion of the research is that opengov washing does not appear as an isolated anomaly, but as a recurring empirical pattern across different forms of openness. The typology developed in Chapter 4 showed that performative openness can take the form of performative data disclosure and obfuscation (data washing), institutional window-dressing (institutional / compliance washing), performative participation (participation washing), performative transparency (transparency washing), and ghost platforms. Despite the diversity of these forms, the case studies demonstrated that they all converge on a fundamental discrepancy between the externally visible existence of an openness action and its limited accountability, participatory, or administrative effectiveness. Thus, laws, platforms, public consultations, publications and datasets may exist as institutional or technical outputs, without necessarily being converted into outcomes of substantive transparency, participation or public value.

The comparative analysis of the cases also highlighted certain stable empirical patterns that crosscut more than one typology. Prominent among these are the recurrence of forms of openness that remain institutional or technical showcases rather than substantively functional tools, the existence of information or participatory channels lacking equivalent capacity for oversight or influence, and the inability of many initiatives to acquire continuity and organizational resilience over time. In this sense, the research demonstrates that opengov washing is not merely a problem of deficient transparency or failed digitization, but a pattern of recurring discontinuity between the institutional form of openness and its practical activation.

The second key conclusion is that the aforementioned empirical patterns appear to be produced by specific institutional and organizational mechanisms. The analysis of Chapter 5 showed that symbolic compliance and institutional decoupling, visibility without accountability, technological implementation without organizational embedding, participation without institutional uptake and the lifecycle fragility of digital infrastructures constitute recurring and often overlapping dimensions of the phenomenon. Thus, a single case study can illuminate more than one such mechanism simultaneously, confirming that these are not watertight classification compartments, but multiple facets of the same phenomenon.

The significance of this finding is twofold. First, it shifts the analysis from the level of individual "weaknesses" in the cases under examination to the level of the recurring mechanisms that produce them. Second, it allows for the identification of the central interpretive framework of the paper, namely the institutionalization gap: the point at which an openness initiative forfeits its institutional substance as it transitions from announcement and technical development toward organizational embedding, social utilization and the creation of a substantive policy impact. It is precisely this gap that explains why visible forms of openness so frequently remain outputs without corresponding outcomes in terms of public value.

The third key finding concerns the diagnostic contribution of the study, which is encapsulated in the Opengov Authenticity Framework (OAF). The OAF emerges directly from the preceding empirical synthesis and theoretical interpretation, serving as an evaluation framework for the authenticity of open government actions. As already mapped out, its core dimensions are Usability & Accessibility, Reusability / Functional Openness, Administrative Responsiveness, Organizational Embedding, Institutional Continuity and Measurable Impact. In this manner, the OAF translates the mechanisms of opengov washing and the institutionalization gap into concrete diagnostic questions: can the initiative be used in practice? does it produce functional value? is there a feedback loop? is it organizationally embedded? does it survive over time? does it produce an outcome?

The contribution of the OAF is that it shifts the analysis from a simple description or critique of cases to a more systematic assessment framework. It does not function as a moral or political condemnation, but as a tool that helps distinguish an ad-hoc, performative initiative from a substantively institutionalized and publicly useful form of openness. In this form, the OAF constitutes – beyond being a research output of this work – a practical tool that can be utilized for comparative analysis, institutional self-assessment and social oversight.

The fourth and perhaps most critical conclusion concerns the conceptual contribution of the term opengov washing itself. This study demonstrates that open government should not be evaluated solely on the basis of the formal existence of tools, processes or institutions, but must be examined in terms of whether these are converted into substantive outcomes of accountability, participation, oversight and, ultimately, public value. In this context, opengov washing does not merely signal a "failure" of open government, but rather the strategic or structural production of forms of openness that simulate it without generating measurable public benefit or institutional transformation. Therefore, this concept allows for the identification and analysis of phenomena that would otherwise remain scattered among interpretations of poor implementation, technological dysfunction or incomplete compliance.

This conceptual contribution is significant because it extends the discussion on "washing" beyond more established fields – such as greenwashing or open-washing in specific technological domains – and transfers it to the field of public administration and open government as a comprehensive governance paradigm. At the same time, it allows open government to be read not only as a normative ideal but also as an arena in which forms of symbolic legitimation can be produced without corresponding institutional change. In this dual sense – as an interpretive tool and as a critical analytical category – opengov washing constitutes the primary original conceptual contribution of this study. On this basis, more specific policy recommendations can now be formulated regarding how openness can avoid its performative versions and transform into actions with substantive social impact in terms of public value.

6.2 Policy Recommendations: How to Avoid Opengov Washing

The preceding analysis demonstrates that opengov washing is not countered with more rhetoric in favor of openness, nor with a simple increase in the number of tools, platforms or publications. On the contrary, avoiding it requires interventions targeted precisely at the points where openness initiatives lose their institutional intensity: weak organizational embedding, the absence of feedback mechanisms, the lack of continuity and the systematic prioritization of visible outputs over substantive outcomes. In this light, the policy recommendations that follow constitute the practical translation of the mechanisms highlighted in Chapter 5 and the dimensions codified in the OAF. If the mechanisms of washing show where and how openness is weakened, policy recommendations must demonstrate how it can be more substantively institutionalized, while simultaneously answering the study's third research question regarding which institutional and policy interventions can limit opengov washing and enhance the production of public value.

6.2.1 Institutional Integration Prior to Digital Development

The first and most fundamental policy principle emerging from the research is that no digital or participatory openness infrastructure should be developed without prior institutional and organizational anchoring. This proposal directly addresses the mechanisms of symbolic compliance and technological implementation without organizational embedding, as well as the central finding of the institutionalization gap – namely, that many initiatives "break" precisely during the transition from technical implementation to organic integration. In policy terms, this means that the development of a platform, a participatory process or an open data tool must succeed the resolution of several elementary questions of institutionalization: which unit is competent, who bears the administrative responsibility, which administrative process feeds the tool, which department is obliged to update it and with what frequency, how it integrates into daily workflows and who evaluates its operation. The principle summarizing this proposal could be phrased as: "no platform without institutional ownership".

This proposal is also directly linked to the OAF. From the perspective of the authenticity framework, an openness action cannot be considered substantive if it already fails in the dimensions of Organizational Embedding and Institutional Continuity. Therefore, a critical policy implication of this work is that public administration bodies should not be evaluated solely on whether they launched a platform or created an openness channel, but on whether this has been integrated into actual organizational processes.

At a practical level, this means that any digital development must be preceded by a mandatory institutional readiness check, which verifies:

- Organizational responsibility (who is in charge),
- Maintenance roles (who keeps it running),
- Envisaged integration into decision-making (how it impacts policy) and
- Clear provisioning for its operational lifespan (how long it is funded and supported).

Without these elements, the likelihood of openness ending up as a symbolic output or even a ghost platform remains exceptionally high.

6.2.2 Mandatory Feedback Loops and Participation Traceability

The second key policy proposal addresses the performative nature of participation and, more broadly, all cases where the administration creates entry points for opinion, evaluation or commentary without institutionally establishing the translation of this input into administrative action. The analysis demonstrated that the central problem here is usually not the absence of a participatory channel, but the lack of institutional uptake – namely, the provision of a clear and transparent feedback mechanism (feedback loop), an institutional link to the competent authority (authority linkage), and the ability to track modifications (amendment traceability) in administrative practice. Consequently, a substantive policy against opengov washing must introduce mandatory participation traceability mechanisms rather than merely sufficing with organizing consultations or creating digital evaluation tools. The principle here could be vividly phrased as: "participation without traceability is invalid". A process that accepts participation but cannot show how it was recorded, how it was examined and whether or not it influenced the final decision should not be considered a valid form of open, participatory governance.

In policy terms, this means that every public consultation process, multi-channel evaluation or participatory platform must be accompanied by three minimum institutional deliverables:

- A public participation report: This must not be limited to the number of comments or participants, but must present the key categories of inputs.
- A reasoned administrative response: This must detail which points were taken into account, which were not, and why.
- A link to the final administrative or legislative act: This is required so that the actual influence of the participatory process can be verified.

Such an approach is directly linked to the Administrative Responsiveness dimension of the OAF, as well as to the broader requirement for openness to transition from the mere recording of inputs to their verifiable processing. In this way, participation ceases to be performative and acquires institutional weight.

6.2.3 Sustainability, Maintenance, and Lifecycle Indicators

The third policy proposal stems from the dimension of lifecycle fragility and the finding that many openness initiatives fail in their capacity to survive over time. Ghost platforms demonstrated that initial visibility, innovative language or one-off funding are not enough to ensure continuity, while the institutionalization gap showed that the lack of continuity is an inherent part of institutionalization failure. Therefore, avoiding opengov washing

requires a logic of "lifecycle governance": every openness action must be treated as an institution with a lifecycle, maintenance needs, review points and requirements for survival across different political and administrative cycles.

Practically, this means that public administration must accompany every new openness initiative with sustainability and maintenance indicators, rather than merely startup indicators. Such indicators may include:

- The frequency of actual updates and active use of the platform or tool,
- The existence of designated maintenance personnel,
- The preservation of active participation or reusability over time,
- The integration of the infrastructure into annual administrative planning, and
- The capacity to survive changes in political leadership or the expiration of external funding.

In OAF terms, this proposal directly addresses the dimension of Institutional Continuity, while indirectly reinforcing Organizational Embedding. In policy terms, the core message is that an openness action should not be deemed successful at the moment it is launched, but only if it demonstrates sustainability and operational maintenance over time.

6.2.4 From Outputs to Outcomes: Public Value as a Criterion for Success

The fourth and most comprehensive policy proposal concerns the way the success of open government initiatives is evaluated. The analysis demonstrated that one of the fundamental problems of opengov washing is the tendency to measure success in terms of visible outputs – how many laws were passed, how many platforms were launched, how many datasets were published, how many consultations were conducted – and not in terms of substantive outcomes. This point lies at the core of both the public value deficit and the OAF. Consequently, a serious policy against opengov washing must reorient the success criteria of open government from logging activity to assessing impact. Openness should not be considered successful simply because it exists, but because it is proven to function.

In terms of administrative practice, this means that public entities must accompany every openness action with public value indicators, which verify not only the existence of the tool but also the outcome it produces. For example, in the case of data, mere posting is not enough; it must be examined whether they are indeed reusable and capable of supporting independent oversight. In the case of participatory processes, the number of participants is not sufficient; it must be examined whether there was a documented administrative response. In the case of platforms, the existence of a URL or an "inauguration" is not enough; it must be verified whether the infrastructure remains operational, is used, and produces administrative or social outcomes. With this shift, public value becomes the ultimate criterion of success for openness, rather than the simple display of institutional or digital activity.

From this perspective, the OAF can also be utilized as a policy instrument: not only for the ex-post evaluation of cases, but also as an ex-ante design framework, so that openness actions are organized from the very beginning based on usability, reusability, responsiveness, integration, continuity and tangible outcomes.

Overall, the aforementioned proposals form a coherent policy framework against opengov washing:

- Institutional integration prior to digital development addresses symbolic compliance and organizational decoupling.
- Mandatory feedback loops address participation without institutional uptake.
- Sustainability and maintenance indicators address lifecycle fragility.
- The transition from outputs to outcomes addresses the public value gap that runs through all the cases.

In this form, this subsection constitutes the practical culmination of the analytical model developed in this work: transitioning from typology, to mechanisms, to the institutionalization gap, to the OAF and finally, to the prerequisites for avoiding performative openness in the future.

6.3 Limitations and Future Research

This work attempted to develop a conceptually and empirically grounded approach to opengov washing, combining theoretical analysis, comparative case studies and the formulation of a diagnostic authenticity framework. However, like any research project, this study bears certain limitations that must be explicitly acknowledged. Recognizing them does not weaken the contribution of the analysis; rather, it clarifies its scope, determines the limits of generalizing the findings, and highlights more clearly the directions in which future research can move.

The first major limitation concerns the methodological nature of the research as a qualitative approach. The paper explicitly adopts a qualitative research strategy, combining conceptual analysis and multiple case studies with the goal of understanding the mechanisms through which declared openness is decoupled from its substantive implementation, rather than measuring the actual extent of the phenomenon. While this choice is compatible with the subject matter and the research questions, it carries the limitation that the findings of the analysis are primarily interpretive and analytical in character, rather than statistically generalizable. In other words, the study explains how opengov washing operates and what its basic patterns are, but does not attempt to quantitatively assess the frequency or distribution of the phenomenon across a broader population of cases.

The second limitation concerns the selection of the case studies. The study is based on a comparative analysis of selected cases from Greece and abroad, chosen on the criteria of public sector relevance, availability of evidence and representativeness regarding different forms of washing. While this choice is methodologically sound for a multiple-case study approach, it implies that the typology and mechanisms of opengov washing are built upon a targeted rather than an exhaustive set of cases. Consequently, the analysis does not claim to map the entirety of potential manifestations of performative openness, but rather to highlight sufficiently documented and comparatively fruitful cases capable of supporting the conceptual and diagnostic contribution of the work.

The third limitation relates to the lack of full quantification of the findings themselves and, specifically, of the OAF. The paper proceeds to formulate an evaluative authenticity framework with concrete dimensions, but this framework is developed primarily as a diagnostic and interpretive tool rather than (as of yet) a quantified set of indicators. This choice is consistent with the overall methodological direction of the study, but at the same time, it means that the OAF, in its current phase, functions more as a structured assessment

framework rather than a weighted measurement system with indicators, weights and scales. This does not constitute a weakness of the framework as an analytical tool, but rather a clear area for its further development.

A fourth, milder limitation could also be added, concerning the nature of the sources of documentation. The study relies on a combination of academic literature, institutional and legal documents, official digital sources and selected publicly available secondary sources. While this choice is reasonable and largely necessary for studying phenomena that leave public traces primarily through regulatory, administrative and digital records, it also means that the analysis focuses on publicly traceable documentary signs rather than internal organizational dynamics that would require, for instance, interviews, questionnaires or access to intra-administrative data. Consequently, the study is particularly strong in documenting externally observable forms of decoupling, but more limited in mapping the internal micro-mechanisms of decision-making that produce these forms.

Beyond these limitations, however, the present study opens up a series of fruitful directions for future investigation. The first -and perhaps most obvious- is the quantification of the OAF. Since the authenticity framework was developed here as a conceptually and empirically grounded diagnostic tool, the next step could be its operational translation into a more standardized evaluation system, with clear indicators, potential weighting of dimensions and comparative application to a larger number of cases. Such a development would allow not only for a more systematic comparison between open government initiatives, but also for the potential use of the OAF as an *ex-ante* and *ex-post* institutional evaluation tool.

A second significant direction is a comparative European study of opengov washing. While the present work already combines Greek and international cases, a more systematic comparative study at the EU level (or broader) could examine whether the forms of opengov washing and institutionalization gaps manifest with different intensity or form depending on the administrative model, quality of governance, digital maturity, or the type of European regulatory pressure. Such a direction would enhance not only the comparative scope of the OAF, but also the understanding of how European compliance mandates may sometimes reinforce and at other times facilitate forms of symbolic or performative adoption of openness.

A third direction concerns the connection of opengov washing to the broader debate on democratic backsliding and the decline of the rule of law. This study focuses primarily on the discrepancy between declared and substantive openness and the way this translates into low accountability and public value. However, a next phase of research could examine whether performative forms of open government constitute not only a technocratic or organizational dysfunction, but also part of broader trends of democratic weakening, in which the language of transparency, participation and accountability is misused to sustain or conceal deeper shifts in power.

Furthermore, to the extent that performative openness is perceived by citizens – even if intuitively or experientially – it can fuel a vicious cycle of institutional cynicism, erosion of trust and decay of democratic legitimacy, within which weakened accountability creates more favorable conditions for further opacity and corruption. Establishing such a connection would lend opengov washing even greater political and theoretical

significance, while simultaneously highlighting the highly timely and critical principles of authentic open government.

A fourth -and potentially highly fruitful- direction is the longitudinal study of the lifecycle of openness platforms and tools. This study has already highlighted the importance of the temporal dimension and institutional continuity, particularly in the case of ghost platforms. A longitudinal analysis of platform lifecycle could systematically examine how such initiatives change over time, when and why they are abandoned, which indicators foreshadow inertia and under what conditions certain infrastructures ultimately manage to become institutionalized. Such research would significantly enhance both the empirical robustness of the OAF and the theoretical understanding of the relationship between digital infrastructure, political alternation and administrative complexity.

Overall, the aforementioned directions demonstrate that this thesis does not close a discussion, but rather opens it on a more structured foundation. By introducing and theoretically grounding the concept of.opengov washing, formulating a typology of forms and mechanisms, and developing the OAF, this work proposes a first coherent framework for analyzing performative openness in public administration. Its future directions, as well as its aforementioned limitations, should therefore be read as indications that this field merits further theoretical, empirical and methodological deepening.

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