A Model of Drifting Processes – the Open Data Policy Implementation Process

Abstract. In this paper we explore the on-going implementation of the Public Sector Information (PSI) directive, which is in line with current trends of opening up data for reuse, innovations and new digital services. Today the time frame for implementation set by the European Commission is passed, but the process of implementing the directive is still on-going, more or less successful. We explore organizational culture as one cause for policy implementation processes drifting away from the policy objectives. Our findings build on research from two projects that focus on creating digital services based on archival material. We conclude that policies must be translated and understood at different levels, and that there must be adaptation between the policy and the organizational culture type, with its related values, behaviors and artifacts for a successful policy implementation regardless whether this happens within, or after, expected time frame. Built on our findings, we provide a model that is our first attempt to illustrate, describe and explain the policy implementation process and how it might drift away from or towards the policy objectives.

Keywords: organizational culture, open innovation, open data, digital services, policy implementation.

1 Introduction

In today’s Europe, there is an emerging trend among private and public organizations to open up their borders and resources with the objective to stimulate organizational and societal growth through innovation [e.g. 1, 2, 3]. Related to that, openness and open data is the most recently used concept in the initiative of transforming the delivery of digital services among public organizations [4]. The ideas of openness are globally spread and public sector organizations are actively working on implementing policies for opening up data. In Europe this happens through the Public Sector Information (PSI) directive that defines a high level framework for how, what and when public sector information should be open for re-use by citizens. Originally the PSI directive set out the general legislative framework at European level in 2003. During the review in 2009, the European Commission (EC) stated that in spite of
progress, there were still barriers to the cross-border use of public sector information [5]. The EC also noted that some of these barriers could be tackled within the existing legislation, while others cannot. The PSI directive is to be updated to further open up the market for services based on public sector information [5-8]. This is to be done by including new bodies (the cultural heritage sector, which is archives, libraries and museums); by limiting fees; by introducing independent oversight over re-use rules among EU member states; and by making machine-readable formats the norm. The EC target is that the formulation and implementation of open public data is carried out in all member states by early 2013 [5].

The PSI directive lead to several implications for the cultural heritage sector – the directive has made its entrance, and archives are now expected to open up, letting the material “out” and the citizens “in” in a much more innovative way [5-8]. Moreover, this is in line with policy goals such as increased productivity and improved effectiveness, efficiency, information quality, interaction mechanisms, better governance tools, and the advancement of government coordination and collaboration [9-15]. In short, openness is expected to facilitate democratic processes and the knowledge society, besides increasing innovation and the development of new or improved digital services.

Dealing with openness intellectually is no problem; most people would agree that developing new archival digital services is for the common good. In practice, things are seldom as easy as they seem. There is a list of challenges that archives must handle to open up their information, and these are not only of technical nature. Instead, they range from common policies concerning objectives, strategies and methods, via technical infrastructures and interoperability issues to administrative and organizational challenges [16]. In other words, altogether these challenges often lead to a delay of policy implementation. As there is a list of challenges, there is also a list of obstacles. Our assumption is that just like e.g. agile methods need to shift due to changed conditions, so do the policy implementation processes’ preconditions change over time. Thus, there is a multitude of reasons for this shifts and changes, but for now we will focus on organizational culture.

In this paper we report on findings from two R&D projects. The first project was the Access to Public Information: e-services in Government Agencies and Archives (APIS) project, which set out to explore the preconditions for creating border crossing digital services based on archival material i.e. whether there were any legal constraints that prevented this. The result showed that the legislation in Estonia, Iceland and Sweden is similar, and builds on the idea that all public information should be free to access by citizens. Another similarity is that legislation is at present being updated and adapted to cover digital records as well, although there are still laws that do not cover electronic information.

The second project, You! Enhance Access to History (YEAH), started with the intention to create citizen-centric digital services on archival material in line with the PSI directive, and this should be done through crowdsourcing. The project got a slow

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1 The APIS project website: https://sites.google.com/site/theapisproject/ [2012-10-03]
2 The Estonian Public Information Act RT I, 06.01.2011, 26
3 The Icelandic Administrative Procedures Act No. 37/1993
4 The Icelandic Information Act No. 50/1996
5 The Swedish Freedom of the Press Act SFS 1949:105
start, and what especially puzzled us were the continuous discussions that seemed to stem from a wish to guard, or protect the information held in the archives. Some issues were repeatedly brought up to discussion, e.g. concerns around the responsibility for the material and where this resides; thoughts about what happens if the information added by a crowdsourcing citizen is wrong; and questions such as whether these changes and the related metadata should go back to the archives. In essence, openness showed up to be a tricky matter for a sector that long has concentrated on preservation.

Following this, the aim of this paper is to explore the organizational culture and its influence on an open data policy implementation process. We will provide a model that constitutes the first contribution towards describing and explaining a policy implementation process that is drifting away from the policy objectives, thereby expanding the time frame for implementation.

The remains of this paper are structured as follows: first we describe our methodology, before we provide an account of archives and their organizational culture, and the empirical material underlying this case study. This is followed by a description of the theories we have used. Thereafter a discussion of our findings is presented followed by our conclusions and our Model of Drifting Processes.

2. Method

This paper is explorative, and describes a case study, that is an investigation of a process. Our research started with wondering why the idea of opening up the archives, and facilitating access to the material with the help of citizens or end-users, met opposition. The case study is qualitative, and aims at insight, discovery and interpretation, rather than hypothesis testing, in line with Merriam’s recommendations [17]. It explores the process of implementing the policy of open data – the PSI directive – in its real-life context [18].

The empirical material is gathered by one of the authors and it stems from two connected projects and consists of various project documents (project descriptions, meeting notes, e-mails and reports), collected by the author from January 2011 until today, from observations during projects meetings and discussions, and finally also from a semi-structured interview. As such, it involved frequent visits to the two field sites, and this happened over an extended period of time, as suggested by Walsham [19]. In addition, the author involved in the projects has a history of research in collaboration with the cultural heritage sector, and is well acquainted with the archival context [e.g. 20, 21, 22].

Based on the project documents and the observations, we identified the organizational culture as one possible factor that hampered the project, a project that aimed at contributing to implementation of the PSI directive. Hence as the next step we turned to theories on organization and open innovation, with focus on organizational culture and its characteristics. Thus, our approach is inductive, since

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6 The project team consists of people from National Archives in Estonia, Iceland and Sweden, an Estonian company and researchers from Luleå University of Technology. However, for the purpose of this paper, emphasis is on the Swedish situation.
the process started with reflections on the empirical, before turning to theories [17, 18]. Moreover, the theories we use constitute part of an iterative process between data analysis and the theories [19]. Our aim is to expand theories on organizational culture by emphasizing its significance for open data policy implementation.

The case study ended with an interview with the Director General of the Swedish National Archives (SNA) around the theme “Open Data and the National Archives”, with specific focus on organizational culture.

Our data was first openly analysed; focusing on identifying what characteristics of the organizational culture could be discerned in national archives. The analysis continued by discussing the findings in relation to theories on organization, culture, organizational culture and open innovation.

3 The Archival Organization, its Context and Culture

Archives mission is to secure the long term existence of archives, i.e. that archival materials are preserved, taken care of, and made accessible for current and future generations [23]. The intention is to safeguard the societal memory and the cultural heritage, and to guarantee information needs for jurisdiction and governance in a democratic spirit. Since National Archives are regulatory governmental authorities, their responsibility is nationwide, and laws and regulations regulate their work.

The Swedish National Archives (SNA) was officially founded in 1618, something that makes it one of the oldest Swedish authorities. As such, SNA has a long history and their organizational culture is old and solid, built up during centuries. Today SNA has its head office in Stockholm, and employs around 600 persons. A General Director whom holds the position for a time period of 6 years runs it.

From the beginning the archives preserved hand-written documents that needed a certain care and attention. The temperature and degree of humidity must be accurate so the material would not be damaged or destroyed. Another aspect is that it was necessary to be able to find documents and records; hence a system for how to arrange the archival collection was created.

Besides collect and preserve, archives are also expected to make their collections accessible [23]. For that reason reading rooms were created, where citizens could come to the archives, ask for documents and records, put on some white cotton gloves and read the document of interest, something that of course still is possible. IT, however, changes archives, and makes also access into something completely different, opening up for new, extended possibilities and easy ways to view archival material. This work has started, mainly by digitizing archival collections and making them accessible through websites, but so far it is only a small amount of archival material that is digitized. Moreover, contemporary access services in memory

7 The interview took place at Luleå University of Technology Oct 23rd 2012
8 Not all National Archives are that ancient though, the Icelandic National Archives is only 130 years old, and the Estonian National Archives started in 1920.
9 It also includes the Military Archives, the Research Center SVAR, Media Conversion Center and the Regional State Archives, situated around the country.
institutions are more organization-centric than user-centric and the services are
developed based on how things functioned in an analogue world [22].
That information is free to access does not mean that it should be available for
anyone to use. There are a number of restrictions, of which the first concern personal
integrity and aims at securing the fundamental rights of individuals10. Other
restrictions are found in regard to national security11 and aim at ensuring that
information which might endanger the safety of the state should not be possible to
access. Therefore, public information is not automatically official – public
information must be classified as official and not as secret, in order to be accessible.
Hence, when implementing the PSI directive, it is necessary to be aware that there can
be restrictions regarding the material, and thus, one need to be attentive of any law
that might influence if and how government data can be open, if at all.

1.1 The Projects

The first project, running during 2011, went as planned, as a one year pre-project
aiming at settling the preconditions for the follow-up project. The project team is the
same in both projects, and consists of two persons from the university area, seven
persons from three National Archives and one person from an SME. As such, the
project members come from different sectors, and accordingly with different
organizational culture experiences. In addition to that, it must be remembered that the
organizational culture might also differ between different areas, between different
organizations, and between different departments.

The first project focused around citizen-centric digital services, and there was
agreement on the vision to collaborate and coordinate material from the Archives,
Libraries and Museums (ALM) sector, in order to provide citizens re-designed, new
and innovative digital services. The project conducted a comprehensive investigation
of the area, decided to focus on archives, and develop a shared framework for new
and unified digital services in archives. The project results were a report on the legal
frameworks, how access is granted today, and main gaps and challenges for providing
seamless access digital services to public information in the Nordic-Baltic region.

The second project soon encountered difficulties. The project started in December
2011, and in January 2012 the project team decided that the project would aim at
“enhancing descriptions of digital objects in existing archival collections by
crowdsourcing, in order to improve the description of archival material as well as to
improve access to the same”12. However, crowdsourcing was immediately debated as
there were many concerns of what this might imply and what difficulties it could
bring along for the archives. As a result the project team decided to instead look into
Linked Open Data (LOD). Even so, the discussions went on, hampering the project,
and during autumn 201213 the project team stated that there was need to meet face to

10 The Personal Data Protection Act (RT I, 30.12.2010, 11) in Estonia; the Personal Data Act
11 The State Secrets and Classified Foreign Information Act (RT I 2007, 16, 77) in Estonia; and
the Publicity and secrecy Act (2009:400) in Sweden.
12 Meeting notes, 2012-01-18
13 Meeting notes, 2012-09-04
face, to decide: a) Type of data b) Find a partner that link open data, and c) an idea of how it technically will work. The face to face meeting took place in Estonia October 2012. By then the project had made a review of what crowd sourced archival material is found today, and the project team had made several suggestion of possible scenarios for the project to go on with. Nevertheless, the project team reasoned that “the train had left” and it would be hard to make any new or innovative contributions through crowdsourcing. Hence, it was decided that LOD was a more interesting and of more value to the citizens. The project is on-going and today a common understanding of what the project aims to achieve is finally reached. The expected result of the second project is “a demonstrator for any memory institutions to open up their data and link their cultural heritage information to the semantic web.” It is also decided to focus on genealogists and to narrow down the material to look into by an intuitive interface. The project will thereby provide a simple methodology to annotate relevant holdings. Finally a methodology handbook will be written, on how to create cultural heritage open data and link it to the semantic web. The project is to end by April 2014.

1.2 Organizational Culture

The initiative of Open Data will be central, said the General Director, since the PSI directive makes it possible to ask new and other questions than the initially intended with a material. Open data is of strategic significance and of huge societal relevance, but most important is that the material or information is actually being used.

The General Director emphasized that SNA should not regulate the use of their information. It lies in the Internet’s nature, archives cannot be open and available while simultaneously be in control. Personnel in the cultural heritage sector and memory institutions to some extent reckon that they “own” the information, and are happy to be generous – on their own terms. This stems from tradition; archivists have been regarded as keepers of the archives [23]. Now IT replaces archivists’ responsibility as keeper of the archives, IT replaces the term archives as premises, and IT has become the carrier of the societal memory, a task which has been assigned archivists for centuries [20, 22]. Again, archivists work situation has changed profoundly the last decades.

The work to change the organizational culture at SNA has started and to succeed, “you need to nag, and focus on changing attitudes.” But SNA has well established structures, and there exists a fear that others will manipulate the material – “they might do anything.” This the General Director regarded as irrelevant, since the originals are in safe care at SNA. In this work they emphasize processes, which should be coherent. The recent merger of regional archives with SNA into one authority provides a good opportunity to re-create the authority culture, work on basic values, and define the mission together.

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14 By April 2013 the second project have had 21 meetings in total, of which 3 has been face to face.
15 Meeting notes 2013-03-25/26
Thus, the organizational culture is deeply rooted, and the elusiveness of the digital is frightening. That archival material is everybody’s property is hard to accept, and the limit for where the SNA responsibility ends is unclear in personnel’s minds. Overall, the archival personnel act very aware of the responsibility and they fully shoulder the same by being competent, knowledgeable and loyal to their organizations. Their professional identity builds on this responsibility, and a sense of duty to really preserve the cultural heritage. The General Director also said that “What archivists have in common is a great love for the archives. But our responsibility, only comprise that the material exists, that it is authentic and that it can be understood in its context. What others does with this material or information later on can never be a responsibility for the archives.”

The positive aspects of the organizational culture in SNA are a love for the mission, continuity and stability (which is fundamentally a good thing, but might impede), and the fundamentally positive attitude towards openness, said the General Director. What might be improved is self-reflection, to see oneself and the archival mission in relation to society. It is important to view the archives as societal resources, he concluded.

4 Open Organizations and Culture

Traditionally, public organizations have had common characteristics such as rational rules and procedures, structured hierarchies, formalized decision-making processes and advancement based on administrative expertise [24]. These organizations have also, for a long period of time, been subject to political control rather than market control. Hence, these organizations are affected by the underlying political ideologies and thus cannot be equated with productive activities in the private sector [24]. Public organizations are also oftentimes viewed as less prone to answer positively to new requirements such as volatility and virtuality [25]. Now there is an expectation on public organizations to shift control mechanisms and to become more market oriented with increased competition and become responsive to the changing economic environment [24, 25].

The increasing expectation on organizations in general, to open up has led to a situation where many organizations strive to balance between closed and open approaches since too much openness can negatively impact the organization’s success due to e.g. loss of control [26], and a closed approach does not support the increasing demand to innovate [e.g. 1, 27]. This means that organizations can adopt an open approach along a continuum from closed to open, hence, it is not an “all or nothing” approach [28]. But to implement an open approach, there is a need to modernize and transform many organizations’ processes, which often has occurred by adding an open perspective on top of existing processes instead of creating radically new ones [3]. Opening up organizational processes is also to some extent, an individual pursuit since the implementation of an open approach is dependent on the personnel within the organization who defines the degree of openness they apply [29].

When it comes to the organization as such, their ability to adopt a particular approach is affected by many aspects such as, for instance, the organization’s
characteristics such as culture and structures, their technological infrastructure and their context [30]. According to Parker and Bradley [24], research on organizational culture indicates that the culture is of vital importance when implementing change processes. In addition, from a policy perspective, an awareness of the culture provides a foundation for both explaining and assessing the appropriateness and outcome of the policy to be implemented [24].

However, defining exactly what an organization’s culture is can be rather difficult since many definitions exist, but there is a broad agreement that organizational culture can be viewed as the deeply seated values and beliefs shared by the people working in the organization [31, 32]. Values are the deepest representation of culture and can be defined as a conception distinctive of an individual or characteristics of a group [32]. The organizational culture can also include behavioral patterns and attitudes, behavioral norms, as well as artifacts that give shape to the identity of an organization. In this context, an artifact refers to rituals and ceremonies, stories, arrangements and language created by an organization. Together with behavioral patterns these build the most visible level of organizational culture [32]. These visible elements can be gathered under the term practices. Behavioral norms can be represented by expectations about behavior or its results that are shared by a social group. These can be viewed as social principles, goals, philosophies, and standards that define attitude and legitimate specific behavior. The organizational culture fills the gaps between what is formally expressed and the activities that are actually happening [31].

One very well accepted approach to understand organizational cultures is the competing values model [33, 34]. The main advantage of the competing values model, according to Ovseiko and Buchan [27] is that it makes it easier to grapple with the complexity of the organizational culture through its focus on key cultural characteristics. Based on these it is possible to use the framework as a basis for diagnosing and initiating cultural changes since it gives a framework that supports the discourse.

In the competing values model emphasis is put on the competing tensions and conflicts that exists within any human system with special attention to the tension between stability and change, and the tension between the internal focus and the external focus [33]. In this framework, an organization’s culture is defined as the connection of aspects such as, strategy, politics, interpersonal, and institutions in an organization by organizing the different patterns of shared values, assumptions, and interpretations. In the competing values model two dimensions are distinguished representing an organization’s competing values. The horizontal dimension reflects the extent to which extent the organization focus on change or stability, i.e. centralization and control versus decentralization and flexibility [27, 33]. The vertical dimension reflects the extent to which organization focus on its internal context and processes versus the external context and relationships with stakeholders outside the organization. From the juxtaposition of these two dimensions, four cultural archetypes emerge which all have their underlying assumptions of motivation, leadership and effectiveness [33]. These cultural archetypes are known as (1) the entrepreneurial (also known as the developmental) type, (2) the team (group) type, (3) the hierarchal (bureaucratic) type, and (4) the rational (market) type [27, 33-35], see figure 1 below.
The entrepreneurial type
This development culture, also called the Open Systems Model, emphasizes flexibility and change, and focus primarily on the external context. In this type are growth, resource acquisition, creativity, and adaption to the external context of vital importance. Leaders tend to be future oriented and encourage entrepreneurial spirit as well as inspires to creativity with the intention to acquire additional resources for the organization [33, 34].

The group type
In this group culture, also called Human Relations Model, emphasis is put on flexibility and focus mainly on the internal environment. Organizations with this type of culture tend to be focused on group maintenance. Here are values such as belonging, trust, and participation at the core of the organization. Leaders are focused on teamwork in which empowerment of the employee, mentoring and support are core [33-35]. This effectiveness of this type of organization is based on criteria such as the development of human potential and member commitment.

The hierarchical type
The hierarchical culture, also called Internal Process Model, emphasize internal efficiency, uniformity, coordination and control [33]. Within this type of culture the focus is on stability where the purpose of its actions tend to be execution of regulations. Leaders in this culture type tend to be conservative and cautious, and strict guidelines tend to direct behaviors [34]. In this somewhat rigid context, employees
tend to value job security. The effectiveness of this organization is based on criterions such as control, stability and efficiency.

**The rational type**

In the rational culture, also called Rational Goal Model, emphasis is put on control and the external context. This culture stresses productivity, performance, achievements and competition [34]. The purpose of these organizations are goal attainment hence, leaders tend to be directive, goal-oriented, instrumental and functional and they are continuously providing structure and encouraging productivity [33]. Through its goal orientation, employees actions are controlled while behavior is directed towards the external context [34].

Usually, an organization’s culture are unlikely to reflect only one cultural type, it rather has flavors of the characteristics from all the types, but one of them can be more dominant [27]. Important to note is that when aspects stemming from one cultural type is over accentuated, an organization can become dysfunctional and the strengths with a culture can become its weakness [33]. For example, too much flexibility can end up in chaos, or too much order can end up in a rigid organization.

When it comes to organizational culture in organizations that strives to be more open and facilitate innovation, Herzog [32] has acknowledged that employees’ personalities are important factors in the open innovation mentality and those influencing the culture most is the management. They need to facilitate cultural change, new thinking, and clear mandates to make use of external ideas for innovations. Management also needs to motivate their employees. Herzog also argues that the culture in organizations aiming to adopt an open innovation approach needs to be risk taking. Engaging in open innovation requires an understanding from the organization that they most likely need to reconsider what value is and how it can be captured [29] which can imply that the organization need to alter the mentality of the organization [29]. The organization also needs to be responsive to exploration and exploitation needs by adopting a flexible and professional mentality [36].

**5 Discussion**

First, it is important to keep in mind that there are several reasons that can make implementation processes drift, ranging from the persons involved, their personalities, experiences and their different backgrounds, to country specific culture and organizational culture. The fact that the project team members come from different sectors (university, archives and SME) could therefore be one reason for the projects’ difficulties. Moreover, organizational culture is not static, as well as it can differ between similar organizations, departments etc. As can be noted, the General Director is not embracing the organizational culture to the same degree as employees in the National Archives. Having stated that, we specifically concentrate on the overall organizational culture that can be discerned in archives, and we do so in relation to the idea of openness, as expressed in the PSI directive.
A mission to preserve societal memory is followed by a responsibility. Working in archives puts personnel in a position where they are expected to collect and safeguard evidence and memory of how the society is designed at different times, and how its organizations function and perform. This responsibility colors the culture; by emphasizing the importance of keeping the material intact there is an implicit message – to protect it. When protecting something, control is vital. We argue that this perspective collides with the objective of the PSI directive. The fact that the PSI directive is aiming at openness and brings along the sense of “letting archival material out” is what makes it problematic. There is an inherent discrepancy between the mission of the archives (preserve and control) and the idea of openness. In the projects, this becomes one cause for the projects to drift away from the objective. Moreover, opening up an organization and encouraging others to contribute to their organization includes some risk-taking. In the organization culture studied here, the level of risk taking is rather low since their main objective is to care for, and protect the archives. This implies that the organizational culture somewhat collides with the nature of the policy of open data, which can make the implementation process of the policy more cumbersome and time-consuming.

Archivists belong to a specific community of practice that reflects their work conventions and understandings rather than innovation. Members of communities apply their knowledge within their context and the knowledge within that context is blended with their competence and skills. These, in turn, are formed by the community’s values and norms [25]. In our case, the archivists live with norms and values such as protecting the material in the archive. There is need for shift of understandings, i.e. that archival material can be open while simultaneously still in safe care, and this work is on-going at SNA.

In addition it is essential that the archival community avoid a multitude of different solutions and ways of doing things. This is important because it lays the foundation for synchronization, co-ordination and joint search and retrieval tools for end-users of archives. Technical solutions must be secure, archives cannot risk losing neither material nor metadata during e.g. transfer of records, which is one part of the long term digital preservation process [16]. This also means that the implementation of a policy such as the PSI directive is to function, not only in single organizations, but in a network of organizations, i.e. in a community. This is something that contributes to the complexity of the policy implementation process and therefore also could lead to a drifting policy implementation process.

We argue that depending on what type of organizational culture that prevails, the distance between the organizations current situation (in relation to what the policy aims for) to an implemented policy, differs. An organization with a flexible, adaptable, creative and risk-taking culture can be expected to more easily adopt and implement a policy such as the PSI directive with its open and market oriented nature. The culture in the organization in our study is less prepared for that new line of thought, built on openness, since it is basically a hierarchical culture that is built on stability and control [33]. This means that the organization needs to move towards a more open system approach built on values such as flexibility and change in order to implement the directive. In turn, this also include moving from an internal focus to an external focus.
Moreover, the case described above can be viewed as to some extent collide with the EC’s somewhat technological deterministic view, i.e. that technology will solve it all [37]. When technology does not do this, the action taken is an overview of laws and regulations [6]. But policies concerning IT related implementation have both material and social dimensions [38] therefore policies that build on technological possibilities require actions from human actors, in order to be implemented. Policy making at European level can of course not focus on individuals in every organization. It is each and every organization that must translate the policy to their context, and transform or adapt their organization in order to implement the same. And the organization must encourage their personnel to accept and adopt the changes needed. The PSI directive is an IT driven initiative, and if the personnel do not adhere to this, they might choose to do differently [39]. This does not mean that the PSI directive never will succeed, many times change happen incrementally, through small adjustments in every day work [37]. It can also be argued that perhaps it should not succeed, and that not all data should be open data, even if it is public. However, this discussion is outside the scope of this paper. For now we claim that if the organizational culture, with its accompanying values, behaviors and artifacts [31], is not in line with the implicit nature of the policy the time to fully implement a policy is extended; the implementation process is drifting away and the organization does not reach the policy objectives.

6 Conclusions

This paper aimed at exploring organizational cultures’ influence on the time-span of policy implementation. It is the first attempt to illustrate, describe and explain the drifting policy implementation process in a model (Figure 2 below). The simplicity of the model offers a tool for appreciating and modelling aspects that needs to be considered, as they are influencing the time frame for policy implementation. In other words, the model can be used by organizations to facilitate understandings of and communication on different aspects that influences the policy implementation process, causing either progress towards the intended policy goals, or making the process drift away from these. However, we intend to elaborate more on the model in the future. For now, our conclusions are as follows;

• Governmental policy objectives must first be translated and understood in the community, for coherence, synchronization, and co-ordination.
• Individual organizations also need to understand and translate the policy in relation to their specific culture.
• Policies are more or less in line with the organizational culture in organizations, hence organizational culture type influence the distance to a successful implementation when the policy is initiated (the y axis in Figure 2 below). This means that some organizational cultures are initially much distanced from the objectives of the policy to be implemented, while others might almost, or already, have reached these. The y axis then, denotes an
appreciation of how far or close an organization is to have implemented the policy objectives.

Organizational characteristics such as, values, behaviors and artifacts that are related to the organizational culture type influence the time span for policy implementation (the x axis in Figure 2 below). These thoughts constitute the basis for our Model of drifting processes, found in Figure 2 below. The dotted arrow illustrates the desired process for the policy implementation process.

![Figure 2: Model of a drifting policy implementation process.](image)

- Different actions, such as knowledge creation, decisions, arrangements and interventions taken during implementation might either increase or decrease both distance as well as speed to policy implementation (curved arrow above), i.e. an active and goal directed work to accomplish the implementation will reduce the time span. In turn, this contributes to reach a successful implementation of the policy within specified time frames.
- The actions together with degree of coherence between policy, culture type and culture characteristics decreases the distance to implementation. This means e.g. that an organization that starts with a small distance to successful implementation when the policy is initiated, but which does not act towards the goal, will experience a long time span, and is therefore not successfully implementing the policy within expected time frame (dashed arrow).

Finally, our research shows that organizational culture type, and the cultural characteristics such as, values, behaviors and artifacts connected to the same influences the policy implementation process. Having concluded this, we once again want to stress that there are other factors influencing this type of implementation processes, e.g. knowledge, structures, strategies and technological infrastructures, which are equally important to take into consideration.

Additionally, it would be interesting to try the model in other contexts than the cultural heritage sector. We hope to elaborate more on these in further research. Finally, the question of the aims and intentions following the PSI directive is another
issue that could be further explored. It is possible that what, when and how data should be open, even if public, should be more investigated.

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