

**Transparency in Government of Canada Public Procurement Practices: Beyond
Vision and Voice?**

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Abstract

This dissertation investigates how transparency is operationalized by the Government of Canada (GoC) in the procurement activities it conducts through the [Buyandsell.gc.ca](https://buyandsell.gc.ca) and *Proactive Disclosures – Contract Dataset* platforms. The former is the central hub for federal-level procurement activities, and the latter is the key hub for accessing information about government contracts and expenditures. Drawing upon Meijer, Curtin, and Hillebrandt’s (2012) vision and voice framework for investigating transparency, this dissertation asks: *How are vision and voice manifest in GoC procurement activities that occur via its two main procurement platforms?* A multi-method qualitative approach, combining desk-based analysis of the [Buyandsell.gc.ca](https://buyandsell.gc.ca) and *Proactive Disclosures – Contract Dataset* platforms and 13 semi-structured interviews with private sector, civil society, and federal government key informants was used to investigate this question. The desk-based phase focused on visibility, assessing information accessibility, usability, and quality at the platforms. The second phase focused on constraints hindering information visibility for stakeholders and its implications for their interests being heard. Private sector participants reported difficulties in accessing timely and relevant information needed to engage in transactions and transparency-related policy discussions. Civil society participants emphasized systemic barriers to meaningful engagement as impediments to achieving transparency. Government officials stressed operational challenges as the key impediments to meeting transparency objectives. Given the small size of the research sample, the findings of this study are necessarily tentative but do suggest a need both for expanding the conceptualization of voice within the Meijer et al. (2012) framework and for revisiting how procurement-related transparency initiatives are designed and implemented.

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Dedication

This dissertation is dedicated to my beloved sister, Suaad, who passed away during the course of this research, and whose memory inspires me every day. It is also dedicated to my father, Zidan Arhoma, whose guidance and legacy continue to shape my path. May this work honor the impact they have had on my life and serve as a tribute to their enduring presence in my heart.

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Chapter 1: Introduction

Throughout the past decade, transparency initiatives have become a fundamental part of public administration reform initiatives around the world (OECD, 2023b; Tavares et al., 2023; Moon, 2020). These initiatives seek to facilitate greater access to government information and enabling interested parties to more effectively monitor and engage in public sector decision-making activities. Increased information visibility, it is claimed, promotes accountability, encourages more informed public debate, and fosters civic engagement; each of which are critical to building trust in government institutions (Porumbescu et al., 2022; Purwanto et al., 2020; Cucciniello et al., 2017; Bannister & Connolly, 2011). Transparency initiatives tend to be associated with the adoption of digital platforms and information management systems, necessitating operational shifts, the acquisition of new technological competencies, and enhanced interdepartmental data coordination practices across government agencies. The key assumption underpinning such efforts rests on the notion that aligning data governance and transparency objectives strengthens institutional effectiveness by promoting organizational cultures of accountability and openness (Yukhno, 2024; Sebastian-Coleman, 2022; Matheus & Janssen, 2020).

1.1 Open Government and Open Contracting

Transparency, openness, and access to government information were key priorities in Barack Obama's 2008 Presidential campaign. A central element of this agenda was a strong focus on open data, particularly open government data (Amsler & Foxworthy, 2014). In 2010, President Obama introduced a multilateral initiative at the UN General Assembly aimed at advancing open government both within the U.S. and globally, pledging to promote transparency, enhance civic participation, and combat corruption through innovative mechanisms and programs (Fraundorfer, 2017; Jaeger & Bertot, 2010). This initiative set the foundation for establishing the Open

Government Partnership (OGP). In 2011, eight countries—Brazil, Indonesia, Mexico, Norway, the Philippines, South Africa, the United Kingdom, and the United States—along with nine civil society organizations formally launched the OGP in New York (Fraundorfer, 2017). The latter countries along with governments who subsequently joined the OGP committed themselves to four core commitments (Open Government Declaration, 2011):¹

1. To increase the availability of information about governmental activities.
2. To support civic participation in governance.
3. To implement the highest standards of professional integrity.
4. To expand access to new technologies for openness and accountability.

As of April 2025, 77 countries² and 150 local governments³ are OGP members. Membership in the OGP entails governments meeting specific criteria pertaining to fiscal transparency, access to information, citizen engagement, and public disclosure (OGP, n.d.-b). In implementing OGP initiatives, member governments follow similar approaches that involve reforming various laws and regulations, designing national action plans, opening new forms of communication with citizens, and harnessing new technologies to enhance the availability and accessibility of government data. Some examples include the creation of online platforms for public consultations, mobile applications for reporting issues, and the use of social media for feedback collection (OGP, n.d.-a).

This said, the commitment to, and results of, Open Government Partnership (OGP) initiatives have varied widely across participating governments. Some governments have claimed success in particular policy areas: Ukraine, for instance, made marked advances in the area of

¹ See, Open Government Declaration, September 2011. <https://www.opengovpartnership.org/process/joining-ogp/open-government-declaration/>

² See, <https://www.opengovpartnership.org/our-members/#national>

³ See, <https://www.opengovpartnership.org/ogp-local/>

open-contracting and the United Kingdom in beneficial ownership (Janices & Aguerre, 2019). Others have withdrawn or been suspended for failing to meet their OGP obligations (e.g., Azerbaijan (2011-2018), Denmark (2011-2024), El Salvador (2011-2022), Hungary (2012-2016), Luxembourg (2016-2022), Pakistan (2016-2020), Tanzania (2011-2017), Trinidad and Tobago (2013-2019), Turkey (2012-2017). At the time of writing the Kyrgyz Republic and Sri Lanka have been deemed inactive by the OGP, a precursor to possible suspension (OGP, n.d.-c).

The varying outcomes can be attributed to a combination of factors, including political will, institutional capacity, and the specificities of individual national contexts, all of which contribute to a diverse range of experiences and outcomes among participating governments (Tavares et al., 2023; Chatwin & Arku, 2017; McGee & Gaventa, 2011; Schnell & Jo, 2019). Countries with strong executive constraints, a well-educated citizenry, and robust civil society networks tend to have more open governments, which enhances their capacity to better adhere to OGP principles (Schnell & Jo, 2019).

Canada formally joined the OGP in 2012. Since then, it has implemented five national action plans,⁴ each designed and executed in consultation with federal government departments, civil society organizations, and other stakeholders.⁵ Throughout its time as an OGP member, the focus of the Canadian government's action plans has shifted from an initial aim of seeking to enhance transparency and openness to, more recently, pursuing principles of participation and collaboration. The first three action plans, designed and implemented between 2012 and 2018,

⁴ See, <https://www.opengovpartnership.org/documents/canada-action-plan-review-2022-2024/>

⁵ As part of an OGP-led pilot experiment, the province of Ontario designed and implemented a sub-national action plan in 2016-2017. In September 2021, the government of Ontario launched a second action plan focusing on the building of a framework for trustworthy AI use (Government of Ontario 2021). In 2020, the province of Québec also became a local member of OGP. Its 2021-2023 action plan had five commitments structured around four themes: open data, open science, digital public participation, and open-source software (Gouvernement du Québec 2021).

centred around openness-related objectives, including open information, open data, open dialogue, open by default, and fiscal transparency (Government of Canada, 2016; Treasury Board of Canada Secretariat, 2014; Treasury Board Secretariat, 2012). The fourth action plan, 2018-2021, included complementary principles, namely, inclusion, participation, and impact (Canada Treasury Board, 2018). The most recent national action plan, 2022-2024, emphasized strengthening public trust, fostering inclusive governance, and leveraging digital tools for innovative and efficient service delivery (Government of Canada, 2022). In so doing, it focused on five core areas: enhancing access to environmental data for addressing climate change, promoting civic engagement and protecting democratic processes, strengthening financial transparency, improving access to justice-related information, and expanding open data initiatives across various sectors (Government of Canada, 2022).

For Canada and many other member countries, the progress and success of OGP initiatives cannot be taken for granted insofar as the national initiatives often seem to have inadequate measurement and evaluation criteria by which to rigorously validate claimed successes (Paré, 2024b, 2024a, 2018; Zuiderwijk et al., 2019). The lack of standardized frameworks, vague indicators, and an overemphasis on implementation rather than outcomes contribute to challenges in assessing whether commitments are genuinely advancing transparency, accountability, and public engagement (Paré, 2024b, 2024a, 2018; Osorio-Sanabria et al., 2020; Tygel et al., 2016). Consequently, it is difficult to empirically validate whether such initiatives are achieving their intended objectives which, in turn, may undermine stakeholder trust and weaken the overall impact of OGP efforts (Alexopoulos et al., 2023).

When it comes to Canada, its OGP national action plans have consistently been critiqued for their lack of specificity regarding the criteria used to assess whether commitments are realizing

their objectives. Paré (2024b, 2024a, 2020; 2018), Karanicolas (2018), and Francoli (2016; 2013), have all asserted that this lack of specificity impedes both the tracking of progress and the measuring of changes to the status quo. The absence of clear benchmarks and metrics mitigates against assessing transparency and accountability because it impedes the ability to empirically validate whether claims of having realized successful outputs and outcomes stand up to empirical scrutiny. The resulting states of ambiguity can contribute to eroding public trust and fomenting claims of open washing, as stakeholders may perceive open government initiatives as lacking genuine commitment to change and/or effectiveness (Molodtsov & Nikiforova, 2024; Chatwin & Arku, 2018; Ingrams, 2016; Johnson, 2016). Ultimately, the responsibility rests with individual OGP member governments to ensure the clarity and robustness of their evaluation frameworks.

Building on these observations across successive OGP national action plans, the IRM has consistently assessed Canada as making slow, steady advancements on the transparency front. The contents of its *Canada End-of-Term Report 2014-2016*, *End-of-Term Report: Canada 2016–2018*, *Canada Transitional Results Report 2018-2021*, and *Canada Results Report 2022-2024* communicate movement along this trajectory, noting advancements in open data and open science, Canada’s broader leadership role within the OGP, and progress on beneficial ownership among other developments. This said, the reports all note that progress on transparency has not been very ambitious.

For example, Canada’s *2018–2020 National Action Plan on Open Government* was co-created during the country’s tenure as government co-chair of the OGP Steering Committee and sought to promote broad and inclusive engagement in both the creation and implementation of the plan. Nonetheless, the IRM observed that the plan itself was too vague in scope and lacked clarity regarding expected results which, in turn, served to limit both its ambition and its capacity to drive

measurable progress on transparency (Paré, 2020). The findings set out in the *IRM Transitional Results Report: Canada 2018–2021* gave credence to the latter concerns, with its author noting that despite most milestones being completed and Canada having active participation structures, implementation of the plan primarily yielded service-delivery improvements without producing measurable gains or substantive advancements in transparency or accountability (Paré, 2024a).

Similarly, the *IRM Action Plan Review: Canada 2022–2024* highlighted the establishment of a public beneficial-ownership registry as a key advancement in corporate and financial transparency, while noting that weak performance indicators and the absence of a clear results framework impeded efforts at assessing whether its objectives were being realized and if civil society actors were leveraging the registry to provide additional oversight of corporate activities in the country (Paré, 2024b). This concern was largely upheld in the most recent *Results Report: Canada 2022–2024* which, among other things, called for a need to invest in developing appropriate performance metrics, to continue striving to foster civil-society engagement, and for the necessity of political will and institutional champions in realising the objectives set out in the country’s OGP action plans.

Complementing these IRM findings, a number of global indexes and measures have consistently identified Canada as maintaining relatively high levels of transparency. For example, Transparency International’s Corruption Perceptions Index (CPI) reports that between 2012 and 2024 Canada’s CPI score fluctuated between a high of 81/100 and a low of 75/100. Canada’s CPI score for 2024 ranked the country slightly below that of its Commonwealth counterparts Australia and the United Kingdom, both of whom had scores of 77/100 (see Appendix A).⁶

⁶ The Corruption Perceptions Index (CPI) measures how corrupt the public sector in a host of countries is perceived to be as per experts and businesspeople. See Transparency International, *Country Data on Corruption Perceptions Index (CPI): Canada* <https://www.transparency.org/en/countries/canada>,

During the same period Canada's risk scores on the Basel Institute's Anti-Money Laundering (AML) Index⁷ declined from 5.00 in 2012 to 4.47 in 2024, with its global ranking for money-laundering and terrorist-financing risk ranging from 110th to 122nd of 144 and 164 countries assessed, respectively, where a lower ranking indicates lower risk exposure. Canada's AML risk profile score for 2024 (4.47) was somewhat higher than Australia (4.04) and the UK (4.14), placing it in the low-risk category but albeit slightly behind these peers (see Appendix B).

In the first four months of the COVID-19 outbreak in Canada, March to June 2020, the federal government was widely chided for its failure to meet increasing demands for information, documents, and data relating to its COVID-19 related activities (Canadian COVID-19 Accountability Group, 2020; Poitevin, 2020; Hodess, 2019). For example, in March 2020, the Canadian Transport Agency suspended airline passenger protection measures without public consultation, raising questions about stakeholder engagement (Rubin, 2020). In the same month, the government sought to grant itself two years of tax-and-spend powers without adequate public disclosure of the relevant information. Although Parliament ultimately rejected this proposal, its passage would have resulted in Canada's *Access to Information Act*, 1985 shielding relevant background records from public scrutiny for 20 years. In June 2020, Canada's Information Commissioner Caroline Maynard called on the government to make access to information an essential service, underscoring the importance of civic engagement and effective accountability mechanisms (Meyer, 2020). Indeed, many of the concerns levied against the federal government throughout the first year of the pandemic regarding the lack of transparency vis-à-vis its

United Kingdom <https://www.transparency.org/en/countries/united-kingdom>,

Australia <https://www.transparency.org/en/countries/australia>

⁷ The Basel Institute's Anti-Money Laundering (AML) Index ranks countries by their vulnerability to money laundering, terrorist financing, and other financial crimes. See, Basel AML Index, <https://index.baselgovernance.org/> and <https://baselgovernance.org/basel-aml-index>

procurement activities resonated with longstanding critiques levelled against the country's Access to Information regime (Duncan et al., 2023; Paré, 2020; Luscombe et al., 2017; Gingras, 2012).⁸

The global COVID-19 pandemic also brought to the forefront numerous concerns and shortcomings with the federal government's public procurement activities.⁹ Public procurement refers to how government agencies acquire supplies and services from outside sources. It spans from deciding upon what is required (i.e., determination) to completing a contract (i.e., contracting) (Snider & Rendon, 2012). Given the vast sums of public money involved,¹⁰ the public procurement process is crucial for enhancing spending efficiency, transparency, and accountability. It also serves as a vital tool for stimulating public service delivery changes, creating jobs, and spurring private sector growth. Within Canada, the pandemic fomented debates about government transparency, especially with regard to the federal government's obligations to openly communicate with its citizens and adhere to accountability and anti-corruption measures (Poitevin, 2020; Rubin, 2020). Critics asserted that the government's decision-making regarding the spending of vast amounts of public money for medical supplies and financial support to individuals and businesses, particularly through its procurement processes, were not sufficiently transparent (Turnbull & Bernier, 2022; Boin et al., 2020; Canadian Taxpayers Federation, 2020; PressProgress, 2020; Sanger & Beauchesne, 2020;).

⁸ For details on the criticisms of Canada's Access to Information regime, see Paré (2020). The review critiques Bill C-58 for its regressive amendments, including the division of the Act and exclusions of certain offices, which were seen as exacerbating existing deficiencies in the regime.

⁹ The Canadian government was not alone in this regard. Globally, emergency-related procurement activities were widely critiqued for a lack of transparency, particularly regarding supplier selection and conflict of interest management (Iacobucci, 2020; Rose-Ackerman, 2021). Many governments (e.g., Colombia, Argentina, the United Kingdom, Canada, and Brazil) were reported to have favored non-competitive processes, awarding single-bid contracts without sufficient oversight (Kubak et al., 2023; Porporato & Ruiz, 2023).

¹⁰ For example, the federal government of Canada spends approximately \$20–30 billion annually on procurement across sectors such as defence, technology, and infrastructure. When considering spending from provincial, municipal, and other public sector entities, total public procurement in Canada amounts to an estimated \$300 billion each year (Government of Canada, 2024c, 2024b).

Specific instances of concern included the awarding of contracts for personal protective equipment and other essential supplies with limited documentation and transparency (PressProgress, 2020; Vermes, 2020). Critics also claimed that some contracts were issued through non-competitive processes, leading to concerns about favoritism and inadequate oversight. For example, there were instances where contracts were awarded through single-bid processes without sufficient justification, raising questions about the fairness and transparency of these decisions (Canadian COVID-19 Accountability Group, 2020; Hodess, 2019). Likewise, there were delays in publicizing contract details and explanations for supplier selections, which further exacerbated concerns about the integrity of the procurement process (Poitevin, 2020).

Taken together, the concerns and criticisms outlined above suggested a possible casting aside, if only temporarily, of OGP principles and values of transparency, participation, and collaboration in the wake of the exigencies created by the pandemic. This said, it seems plausible that throughout the initial phase of the COVID-19 pandemic, the need for quick action on the part of the government may have reduced the level of priority given to providing the public with information about ongoing contracts (Canadian COVID-19 Accountability Group, 2020; Rubin, 2020). This, nonetheless, gives rise to two complementary concerns. First, in times of crisis, governments may attempt to consolidate their power in order to speed up decision-making and resource allocation processes (Basdevant et al., 2022; Boin, 2017). Second, such actions can be used by some actors for their own benefits, thereby further increasing the risk of corruption and other wrongdoings (Fazekas et al., 2025; Sotola & Heywood, 2025; Mungiu-Pippidi, 2015; Schultz & Søreide, 2008).

At the same time, it is important to acknowledge that emergencies often necessitate difficult trade-offs. While the early months of the COVID-19 pandemic in Canada received

considerable public criticism for reduced transparency in procurement, scholars and commentators also pointed to shortcomings in the quality and openness of government data (Lauriault & Hunter, 2020; Edmonds et al., 2020). Evidence from other contexts reinforces this tension. For example, Kohler and Wright (2020) show that the expedited procurement of PPE frequently involved limited documentation or oversight, yet they argue that some level of transparency remains essential to safeguard accountability without impeding response efforts. Similarly, Porporato and Ruiz (2023) compare Canada with Argentina and demonstrate how pre-existing legal and institutional frameworks influence whether the emergency relaxation of procurement rules results in abuse. At a broader level, the OECD (2025) reports that across member states, governments had to balance speed and cost with confidentiality and risks to supply chains, suggesting that temporary procedural adjustments and protections can be justified under crisis conditions. Recognizing these trade-off scenarios is important for developing a more nuanced framework for evaluating transparency, or its reduction, in procurement during emergencies. At the same time, acknowledging such trade-offs does not diminish the need to clearly define what transparency entails.

In the context of open government, transparency involves more than simply making information available. It also requires ensuring that the information is sufficiently reliable, timely, and relevant so as to facilitate enabling meaningful public engagement (Schnell et al., 2024; Ingrams et al., 2020; Mäntysalo, 2015). In other words, transparency, as promoted by the OGP vision, is not merely a matter of governments providing information to their citizens. It also encompasses considerations of whether and how access to information enables citizens and stakeholders to engage in government policy- and decision-making. The effectiveness of transparency, then, is understood as being contingent upon how well access to information and

facilitation of public input are integrated into government practices.

In addition to the acquisition, contracting, buying, renting, leasing and purchasing, of goods and services, public procurement processes also involve requirements determination and contract administration (Drake & Xu, 2025; Nemec et al., 2020; Snider & Rendon, 2012; Thai, 2001). These activities often are administered through rules regulating tendering preparation, advertising, the of publicizing bid opportunities, and bidding procedures (Kenny & Crisman 2016). In this context, transparency requires that the process of contract management and all relevant information—such as selection criteria, award decisions, winners' names, and prices—be publicized (Drake & Xu, 2025; Kenny & Crisman, 2016; Osei-Afoakwa, 2014). Equally important is monitoring how government spending is managed, ensuring that anti-corruption measures and accountability rules are in place and functioning effectively. With this in mind, the OGP encourages member governments to adopt open contracting policies that ensure oversight throughout the procurement process (Open Contracting and Public Procurement, n.d.). Open contracting, as advocated by the OGP, seeks to integrate transparency, accountability, and public participation into public procurement, by emphasizing the need for proactive disclosure of procurement data and stakeholder engagement in order to enhance oversight and, thereby contribute to reducing levels of corruption, inefficiency, and inequitable competition (Atkinson, 2020; Naidoo et al., 2020; 2017).

According to the Open Contracting Partnership (n.d.),¹¹ the global implementation of open contracting has revealed both notable successes and persistent challenges. While some countries have made significant progress in enhancing transparency and competition through open

¹¹ The Open Contracting Partnership is an independent non-profit organization headquartered in Washington, D.C., that collaborates with governments, businesses, and civil society to promote transparency in public procurement. Its mission is to enhance the accountability, inclusiveness, and effectiveness of public contracting through open data practices and stakeholder engagement. See, <https://www.open-contracting.org/about/>

contracting, others continue to face challenges such as political resistance, inadequate public engagement, and institutional barriers. For example, Colombia has seen positive results with the implementing of open contracting principles bolstering transparency and accountability in the government's procurement processes. In contrast, Ukraine, despite improvements in data access, continues to grapple with issues like bid rigging and political interference (Open Contracting Partnership, 2024). Similarly, Mexico, Kenya, and Nigeria must contend with weak engagement, political resistance, and infrastructural challenges as barriers that hinder the full realization of open contracting reforms (Open Contracting Partnership, 2024; OECD, 2021).¹²

The government of Canada (GOC's) second (2014-2016), third (2016-2018) and fourth (2018-2020) OGP action plans contained commitments targeted at making its procurement activities more open and accessible. However, its procurement practices during the pandemic, combined with longstanding concerns about the criteria used to assess openness-related objectives leaves unanswered many questions about whether, or the extent to which, these objectives are being achieved. More specifically, it suggests the possible presence of a gap between the values and principles espoused in the GoC's OGP action plans and its practices in the procurement domain.

1.2 Statement of the Central Research Question

According to the World Bank (2020), well-performing public procurement policies contribute to enhancing citizens' trust in government and in private sector competitiveness because access to timely information about the measures followed when acquiring goods and services enables relevant stakeholders to serve as a public oversight channel. Effectively exercising this oversight is, of course, contingent upon the level of transparency manifest at every stage of the procurement

¹² For further insights into both the successes and challenges of open contracting globally, see <https://www.open-contracting.org/impact-stories/>

process from determining what is required (i.e., determination) to the completion of contracts (i.e., contracting) (Felizzola et al., 2024; OECD, 2016a; Snider & Rendon, 2012).

Across the five OGP National Action Plans (NAPs) the GoC has implemented to date, there have been several commitments and milestones aimed at advancing transparency in procurement processes. The second NAP (2014-2016) included two commitments to open contracting and budget information that sought to increase public access to federal procurement data and improve accountability in government spending through centralized machine-readable disclosures and enhance budget transparency tools. The third (2016-2018) and fourth (2018-2020) plans continued these efforts, with five commitments and 19 milestones focusing on improving the accessibility of procurement data and encouraging public participation in monitoring government spending. The fifth NAP (2022-2024) contained no commitments or milestones focusing explicitly on open contracting but did seek to reinforce efforts aimed at enhancing access to government information, improving transparency, and increasing participation. Despite these measures, questions persist about the effectiveness of the GoC's efforts at increasing transparency in the procurement domain, including concerns relating both to how accessible and available information is to stakeholders (Boots et al., 2024; House of Commons, 2024; OECD, 2020), and the extent of stakeholder engagement in procurement processes (Henriques et al., 2024; Office of the Procurement Ombud, 2024; Office of the Auditor General of Canada, 2021).¹³

Meijer, Curtin, & Hillebrandt (2012) advance a framework for examining the interconnections between transparency and participation that broadly parallels the bifurcated structure of the above concerns. Their framework distinguishes between a transparency element emphasizing the visibility of government actions to citizens and other stakeholders (i.e., vision),

¹³ See also, GoC, Office of the Procurement Ombud, Reviewing Government Contracting Practices, November 28, 2024. <https://opo-boa.gc.ca/examen-reviewing-eng.html>

and a participatory element focusing on government responsiveness to citizen and other stakeholder inputs into decision- and policy-making (i.e., voice). According to these authors, transparency is not merely about making information available. It also involves creating opportunities for stakeholders to engage and influence decision- and policy-making processes. Put simply, Meijer et al.'s (2012) principal contention is that improving transparency relies on the simultaneous presence of both visibility (i.e., what is made accessible) and participation (i.e., how stakeholders engage) to ensure that government practices are both open and interactive. In the light of these considerations, the central research question guiding this dissertation is:

How are vision and voice manifest in GoC procurement activities that occur via its two main procurement platforms?

To address this question, the two following sub-questions were investigated:

(i) In what ways, and to what extent, is information about public procurement made accessible and available to stakeholders?

(ii) In what ways, and to what extent, do stakeholders participate in the government procurement process?

1.3 Dissertation Structure

This dissertation is organized into eight chapters. Following this introductory chapter, Chapter 2 undertakes a review of literature relating to the evolution of transparency as a concept, its intersections with open government, and the role of stakeholder engagement in public procurement. The discusses also addresses conceptual considerations regarding transparency, reviews federal-level e-procurement platforms in Canada, as well as examining how transparency has been operationalized in procurement practices both domestically and internationally.

In Chapter 3 develops I set out the conceptual framework underpinning my investigation. Specifically, I propose modifying Meijer et al.'s (2012) vision and voice framework to recognize

the role of transactional information in facilitating and supporting stakeholder engagement in procurement-oriented transparency.

Chapters 4 through 7 present the empirical findings emerging from the two phases of my project. Focusing on the desk-based analysis phase of my project, Chapter 4 opens with an overview the research design and methodology employed. From there, I move on to presenting the findings emerging my assessment of information accessibility, usability, and content quality at the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* procurement platforms. The chapter concludes with a summary of key observations derived from this phase.

In Chapter 5, I outline the research techniques used in the second, key informant interview, phase of the project and present the perspectives of the private sector key informants who participated in this investigation. The chapter is divided into two main sections. The first, focuses on matters of interview design, recruitment strategy, protocol implementation, and analytical approach. In the second part of the Chapter, I present the perspective shared by the private sector participants and reflect upon the implications of their observations in relation to how the GoC operationalizes transparency in the procurement context. A key message emerging from the private sector perspectives is that transparency, while frequently emphasized by the government as a guiding principle, is often perceived in practice as fragmented, inconsistently applied, and insufficient for fostering equitable competition. The implication of this perspective is that unless transparency mechanisms are operationalized in ways that meaningfully support access to timely, relevant, and actionable procurement information, private sector trust in the integrity and fairness of the system may remain constrained.

Chapters 6 and 7 focus on the perspectives shared by individuals from the other two stakeholder groups with whom I engaged: civil society and government officials, respectively. In

Chapter 6, I present the perspectives shared by the civil society key informants and reflect upon the implications of their observations in relation to how the GoC operationalizes transparency in the procurement context. The central message emerging from their accounts was that while formal transparency commitments exist, persistent obstacles related to information usability and limited institutional access undermine the effectiveness of these measures. The implication of this perspective is that transparency cannot be meaningfully advanced without addressing both structural information barriers and the asymmetries of power that constrain civil society's ability to participate in shaping procurement policy

The discussion in Chapter 7 follows the same structure as that of the preceding chapter but with a focus on the views of officials from the federal government. A key insight drawn from their reflections is that, while the intention to uphold transparency is evident, its practical implementation is hindered by enduring institutional and infrastructural challenges. This suggests that efforts to strengthen transparency must extend beyond external engagement mechanisms to include internal system improvements that enable consistent information flow and responsive stakeholder interaction.

Chapter 8 concludes the dissertation and sees me directly addressing the central research question guiding this project. I suggest that while transparency in federal procurement has been advanced through digital platforms and formal engagement mechanisms, its operationalization remains uneven and contingent. Visibility and voice are enabled in principle, but in practice they are shaped by disparities in institutional access, interpretive discretion, and technological capacity. At the level of theory, this suggests a need to reconceptualize stakeholder voice in public procurement as a plural and context-dependent phenomenon, thereby modifying Meijer et al.'s (2012) vision and voice model. In contrast to Meijer et al. who conceptualize voice as a singular category of

participation, the findings of this dissertation suggest that, within the context of Canadian federal procurement practices, voice is better understood as taking multiple forms that vary across contexts and actors. Put simply, voice is not a uniform activity. It is contingent on institutional roles and settings. This observation points to a need to distinguish between three different modalities of engagement: macro-level practices such as policy consultations and strategic dialogues; micro-level practices such as transactional participation and feedback mechanisms; and internal uses of procurement information by public officials.

At the level of practice, the observations flowing from this dissertation underscore the importance of tailoring transparency reforms to address persistent structural, technological, and informational barriers that constrain meaningful stakeholder participation. For private businesses, this means that their participation and engagement is not simply a matter of submitting bids online. Usability issues, unclear requirements, and limited feedback can frustrate efforts to improve bids. Business actors need to anticipate these challenges and prepare for extra time as well as being persistent. In other words, their participation and engagement are shaped by the clarity of information and the responsiveness of government feedback mechanisms. This implies that private businesses who engage in federal procurement need to calibrate their expectations and operational strategies to ensure they possess the necessary communicative and administrative competency to navigate procedural ambiguities and regular technical and informational delays, and to deal with the need to regularly seek clarifications from contracting authorities. In short, effective participation requires readiness for a process that is more complex and resource-intensive than official platforms and guidelines may initially imply.

For civil society organizations, the findings add empirical credence to their concerns that their participation in federal procurement activities – whether in the form of oversight or engaging

in policy-related discussions - often is largely tokenistic insofar as their perspectives are heard but seldom acted upon in a meaningful way. This said, documenting such ongoing shortcomings offers a basis from which to press for stronger accountability. For government officials, the dissertation highlights how outdated technologies, rigid processes, and resource constraints constrain the potential to incorporate the perspectives of external actors into decision making processes that directly affect them. Improving engagement therefore requires more than procedural invitations; it calls for rethinking what engagement means in practice and implementing participatory approaches such as the IAP2 Spectrum if there is to be any noteworthy movement away from informing toward involving or partnering with stakeholders.

The chapter wraps upon with me offering some suggestions for future research, a final reflection about the significance of this dissertation for advancing scholarly and practical understandings of procurement transparency in Canada.

Chapter 2: Beyond Disclosure: Rethinking Transparency and Stakeholder Engagement in Public Procurement

The discussion in this chapter sets out the core concepts guiding my dissertation project as well as the contested ideas and positions informing debates about transparency and open government. The discussion is divided into four parts. The first examines contending definitions of transparency with particular attention given to the evolution over time in the understanding of this concept. In the second section, the complementary conceptual overlaps between transparency and open government are discussed. Building on this discussion, the third section sets out the connections between transparency and citizens' participation in the context of public procurement. The chapter concludes by revisiting the central research question guiding the study.

2.1 Transparency

Generally speaking, the word 'transparent' refers to how well light can pass through something to make objects behind it visible. It also is synonymous with the words 'true' and 'open' and is an antonym to 'vague' and 'secret' (Holzner, 2007). The Oxford English Dictionary (n.d.) defines transparency, in its simplest form, as the "quality of something, such as a situation or an argument that makes it easy to understand and the quality of an object, such as glass, that allows you to see through it." In etymology, transparency is always linked with vision, as it is about what is made visible and/or disclosed (Michener & Bersch, 2013; Meijer et al., 2012). This notion of visibility is central to how the term is widely understood today. Within the public administration context, the term transparency often is used in relation to making certain types of government and private sector information *visible* and available to members of the public.

Arguing that the concept is simultaneously old and new, Meijer (2015) contends that grasping the full complexity of transparency requires our looking at it from an historical perspective. His position is observable in the dichotomy between recorded interest in transparency

dating back to ancient Greece and ancient China on the one hand,¹⁴ and its contemporary association with making government information available via digital and non-digital channels.

The idea of transparent government is rooted in three achievements of Western liberal democracies in the nineteenth century: establishing the rule of law, opening the law-making process to public view, and protecting freedom of expression about governmental activities (Roberts, 2006). These developments underscore the historical connection between transparency and democratic governance. When Sweden enacted its Press Freedom Act in 1766, it became the first country to implement formal legislation mandating access to governmental information (Florini, 2002). Two centuries later, Finland became the second country to formally enact freedom of information legislation through its Publicity of Documents Act, 1951 (Meijer, 2014). Not long after, freedom of information legislation started gaining momentum, with the United States of America adopting its Freedom of Information Act (FOIA) in 1966, followed in the 1970s by the Netherlands, Belgium, Luxembourg, Denmark, Norway, France, and New Zealand and Austria. Australia and Canada followed suit in the 1980s.¹⁵ In the wake of the collapse of the Soviet Union in the early 1990s, the legislating of freedom of information gained further traction in a growing number of countries (e.g., Ukraine, Croatia, and Latvia) (Meijer, 2014; Roberts, 2006; Florini, 2002). At the beginning of the 21st century, more countries, including South Africa, the United Kingdom, and Bulgaria, carried forward this momentum (Florini, 2002).

In constraining the ability of governments to refuse requests for information from members

¹⁴ In ancient Greece and ancient China the concept of transparency was linked to the idea that watching others impacts their behaviour. See, Wehmeier and Raaz (2012).

¹⁵ The *Access to Information Act* was adopted by Canada's federal government in 1982 and came into force in 1983. It was intended to make documents and data about government agencies that are subject to the Act publicly available to Canadians and corporations present in Canada (Government of Canada, 2024a). The Act remained largely unrevised until 2019, by which time Canada's global ranking for openness had, according to International Civil Service Effectiveness (InCiSE) Index, fallen notably in relation to a host of other liberal democracies. See, Paré (2020) and Clarke et al. (2017).

of the public, the function of freedom of information legislation may be understood as twofold. First, to recognize citizens' right to be informed about government activities and, second, to codify the notion that government documents and information should be accessible to members of the public (Tomkinson, 2023; Walby & Larsen, 2012; Roberts, 2006). The actualization of expectations regarding freedom of information serve to legitimize governments, reduce corruption, and strengthen public participation in governance and, as such, tend to be regarded as a triumph for committing governments to principles of transparency and openness (Fisman & Yegen, 2023; Khosrowjerdi, 2022; Kassen, 2017; Berliner, 2014; Roberts, 2006).

Despite this positive perception, efforts to enact transparency-related laws and reforms often encounter a host of constraints and limitations. For example, in 2015, then Information Commissioner of Canada, Suzanne Legault, stated that despite of the need to ensure Canadians have access to information about government operations, not all entities that perform government functions believe they are – or should be – subject to the *Access to Information Act* (Information Commissioner of Canada 2015). As she put it:

Persistent calls to reform the Act have been made ever since its adoption. In the 30-plus year history of the Office of the Information Commissioner of Canada, my predecessors and I have documented multiple challenges and deficiencies with the Act. The Act is applied to deny disclosure. It acts as a shield against transparency. The interests of the government trump the interests of the public (Information Commissioner of Canada 2015, p. 5).

As the Information Commissioner's comment makes clear, assuming freedom of information laws *ipso facto* equate with transparency is dubious, not least because such legislation need not, and in many instances does not, refer to public participation or other democratic values such as accountability, inclusiveness, participation, and responsiveness. This is exemplified by the fact that even authoritarian states have embraced freedom of information legislation (Lin, 2020; O'connor et al., 2019; Meijer et al., 2018; Xiao, 2013; Congressional-Executive Commission on

China, 2008). Furthermore, the key motivation for embracing freedom of information legislation is not always linked foremost to advancing transparency and/or similar values. Such laws may just as likely be motivated by political, economic, or strategic interests as any genuine commitment to openness per se. The implementation of freedom of information legislation by the government of China in 2008, for example, was influenced by its then efforts to align governance practices with international standards following its 2001 accession to the World Trade Organization and by a recognition of its poor handling of information during the 2003 SARS crisis (Lin, 2020; Stromseth et al., 2017; Roberts, 2006; Congressional-Executive Commission on China, 2003).

In political and social theory, the principle of transparency serves as a necessary base for democratic participation and accountability by protecting the representation of public interests and preferences (Birchall, 2011; Bovens, 2010; 2007; Fox, 2007). It often is linked with a transformative narrative that posits:

Citizens are ignorant of state action; their ignorance impedes their ability to participate rationally in the democratic process; the disclosure of state information enables citizens to act collectively as a polis that is capable of deliberative, reasoned action; this action in turn will hold the state responsible for its actions; and thus, transparency ensures that the state is truly representative of the public's beliefs, preferences, and interests (Fenster, 2015: p. 151).

Expounding on this hypothesis, Fenster (2015), Fung (2013), and Heald (2006) have each argued that democratic transparency involves providing citizens with comprehensive information thereby fostering informed public engagement and accountability which is, in turn, presumed to strengthen democratic practices by ensuring citizens are better equipped to influence governance. The underlying premise here is that, when government activities become visible to citizens, dialogue between government and citizens is enhanced, thereby strengthening democratic processes.

Expanding on this idea, Schmidhuber et al. (2021) argue that transparency functions as a

pivotal enabler of democratic processes by empowering citizens to participate actively in public decision-making. They posit that access to essential information fosters informed discourse and engagement in governance, which is assumed to directly translate into a more democratic system. In a related vein, Meijer et al. (2012) highlight that transparency enhances visibility while simultaneously amplifying the “voice” of citizens. This dual effect is seen by the OGP, along with Schnell et al. (2024), Xiang (2024), and Ruijter et al. (2020), as integral to deepening public involvement and strengthening democratic values, reinforcing the notion of a direct relationship between transparency and democratic outcomes. This position is aptly summed up by Fung (2013) who argues that participatory transparency grants citizens access to vital information and empowers them to influence policy outcomes, fostering inclusivity as a hallmark of democratic governance. Volpato et al. (2023) have recently updated this claim adding, transparency practices create meaningful connections between institutions and citizens by encouraging active engagement in governance processes, thereby aligning with democratic ideals. Taken together, these perspectives imply that transparency shares a direct, linear relationship with the strengthening of democratic systems by enabling citizens to engage, influence, and hold governments to account for their actions.

The notion of a linear relationship between democracy and transparency has long had many detractors. For example, both Relly and Sabharwal (2009) and Michener and Bersch (2013) posited the lack of a mutually agreed-upon understanding of democracy¹⁶ makes it difficult to operationalize, let alone measure transparency. Hollyer et al. (2011) also questioned the assumption of transparency being directly linked to democracy and the propensity in some quarters of seemingly treating the two terms as more or less synonymous. More recently, Leroy et. al.

¹⁶ For an extended discussion of contending models and theories of democracy see, Held (2006).

(2021), Matheus and Janssen (2020), Schudson (2020), and Hofman and Novin (2018) have all challenged claims of ‘transparency equates with enhanced democracy’ for failing to recognize that like definitions of democracy, definitions of transparency vary widely in accord with the contexts and stakeholders.

At issue here is a failure both to delineate the empirical parameters of transparency and to distinguish between what transparency represents and what it does not. Indeed, ‘transparency’ is a term that frequently is subjected to conceptual stretching.¹⁷ According to Schnackenberg et al. (2021), Cucciniello et al. (2017), and Michener and Bersch (2013), remedying this state of affairs is contingent, in part, upon closely examining two conditions implied by the term ‘transparency’ that facilitate distinguishing between what is and what is not transparent. The first condition is ‘visibility.’ It refers to the extent to which information is comprehensive and findable. The second condition, ‘inferability,’ is the degree to which information is simplified and can be used to draw accurate inferences. Seen in this light, simply making information available is not synonymous with transparency precisely because this action does not ensure visibility and/or inferability.

Traditionally, government transparency policies have tended to be evaluated on the basis of government achievements in making information about its internal workings accessible to the public. Building on Michener and Bersch's (2013) dichotomy, Ananny and Crawford (2018) contend that equating transparency solely, or principally, with making more information publicly available privileges seeing over understanding. As they note, being able to ‘see’ inside a system through information disclosure does not equate with understanding the system’s behaviour and/or origins. This leads them to champion associating assessments of transparency with the values and

¹⁷ Conceptual stretching refers to the distortion of the original concept so that it can be applied in a different context (Collier & Mahon, 1993; Sartori, 1970). It also is defined as “broadening the boundaries of the concept so as to include an ever-increasing number of empirical referents without reducing its properties” (Pappas, 2016, p. 9).

benefits gained by the users of the information made available as opposed to information itself.

Another source of ambiguity about transparency pertains to its dual nature as both an end to be pursued, and as a means toward other ends. Seen as an end, transparency may be understood as an ultimate goal of reform. Seen as a means, it may be understood as an instrument for addressing governance concerns, including trust in government, public participation, and corruption in public institutions. In seeking to implicate the dual nature of transparency in evaluations of early e-government and open government initiatives, Harrison et al. (2011) proposed a ‘public value’ framework for identifying values created when interactions between governments and citizens occur in a transparent, participative, and collaborative manner. Operating from the premise that citizens do not pursue transparency for its own sake and, instead, desire government actions to be transparent so that they can assess the outcomes of government work, they applied this model to analyze open government programs in the U.S. Based on their findings, they concluded that transparency, along with participation and collaboration,¹⁸ are potential administrative procedures and decision-making attributes rather than ends in themselves. Paraphrasing these authors, the latter are a means to a better end.

Kosack and Fung (2014) argue that the concept of transparency has extended from being viewed primarily as a necessary component of democratic self-government into the non-government sector where it is associated with information that individuals, as consumers of goods and services, can use to regulate the market. To support their claims, they cite examples of the growing recognition of transparency within education and healthcare as having the potential to catalyze improvements in outcome quality that, in turn, contribute to measurable benefits in

¹⁸ Participation also is not an end in itself. Citizens participate because they seek to generate government action that reflects their participation in meaningful ways. Collaboration does not make sense unless participants can contribute to making rational decisions and solutions that can be implemented. See, Xiang (2024); Hendriks and Dzur (2022), Clark (2021), and Harrison et al. (2011).

citizens' capacities and well-being.

Expounding on this argument, more recent sector-specific applications further demonstrate how transparency is increasingly leveraged outside the political domain. For example, Chiou & Serrano (2024) emphasize its importance in financial markets, where regulatory transparency contributes to investor protection and systemic stability, a point also underscored by Rickmann (2022). In the realm of data governance, Hanisch et al. (2023) highlight how transparency mechanisms can enhance individual autonomy and promote digital accountability. Within environmental regulation, Gupta et al. (2020) show that public access to ecological data has been used to influence corporate behaviour and reinforce policy compliance. Together, these applications reflect how transparency functions as a cross-sectoral instrument for shaping institutional responsiveness and performance. Yet, even as the concept gains practical traction across varied domains, its meaning remains contested and context dependent.

In sum, the concept of transparency is ambiguous, with diverse perspectives often linking it to differing objectives. Further complicating matters is what Michener and Bersch (2013) observed more than a decade ago as a propensity for researchers to cherry-pick definitions of transparency and fitting them to suit their own purpose. This concern is echoed by Malcolm (2017) who underscores the contested nature of transparency, showing how its meaning is shaped by differing policy contexts and stakeholder interests, leading to divergent interpretations and expectations. Similarly, Gold and Heikkurinen (2018), critique the assumption that increased transparency inherently leads to greater corporate responsibility and highlight how the term can be co-opted to serve specific agendas. These contested understandings point to the need for greater clarity about the meaning of 'transparency' not least because the more precise the definition, the more precise the indicators and, hopefully, the clearer the objectives to be achieved through its

pursuit in different contexts (Schnackenberg et al., 2021; Cucciniello et al. 2017; da Cruz, et al., 2016).

As the preceding discussion has made clear, public access to government information has long been recognized as critical to ensuring a variety of governance functions insofar as actions relating to democratic values can only take place when information is available. This said, understandings of the concept of transparency have expanded beyond focusing foremost on information availability and accessibility to incorporate a wide range of considerations spanning from information quality to usability to added value for intended users. This suggests that evaluating transparency practices cannot and should not be limited to only investigating the presence of any specific type of disclosure. Instead, assessments of transparency must also consider the extent to which decisions to disclose information are informed by stakeholder participation, how readily usable the disclosed information is for intended users, and the extent to which it contributes to creating value in the form of continued stakeholder engagement.

The OGP's Articles of Governance¹⁹ advance a view of transparency that parallels this broader understanding. For the OGP, transparency refers to the openness, comprehensiveness, and timely availability of government-held information, including data about activities and decisions. Further, this information must be freely accessible to the public and meet fundamental open data standards.

Aligning myself with approaches to understanding transparency that expand beyond the mere disclosing of information to include consideration of the benefit(s) – whether economic or other – users gain from accessing said information, in this dissertation, I am adopting Mäntysalo's (2015, p. 48) definition of transparency as referring to the “availability and accessibility of

¹⁹ See the OGP glossary for the definition of transparency:
<https://www.opengovpartnership.org/glossary/transparency/>

relevant, timely, comprehensive, high-quality and reliable information about the functioning of the polity and government activities, and the possibility to give feedback and act upon the provided information.” The discussion in the next section looks more closely at the connection between transparency and open government initiatives.

2.2 Open Government and Transparency: Conceptual Considerations

Open government is hardly a novel concept. Today, it is broadly understood as referring to the practice of both making government information readily available online and to engaging in dialogue with citizens (Molodtsov & Nikiforova, 2024; Purwanto et al., 2020; Meijer et al., 2012). The anchoring notion, and one that is central to the work of the OGP, is the idea that information and communication technologies (ICTs) offer a means by which to harness digital opportunities to create participatory, collaborative, multi-directional communication between governments and the citizens they are meant to represent.

Open government data refers to government data that is produced using public funding and which is made available and distributable without any restrictions on its use (Gao et al., 2023; Wirtz et al., 2022; Kassen, 2017, 2013; Janssen et al., 2012). Mayernik (2017) maintained that the movement toward open data during the 20-teens faced many challenges, including two central questions with which the phrase open government continues to contend: *What are data?* and *What is open?* Ubaldi (2013: 6) defined data conceptually “The lowest level of abstraction from which information and then knowledge are derived.” Okamoto (2017, p. 113) suggests data is considered open when it is “online and free, permanent, trusted, assumed to be open, documented, safe to open, and designed with public input.” Numajiri and Hayashi (2024), emphasize that open data is defined not only by its availability but also by its usability, accessibility, and potential to facilitate meaningful public engagement. Complementing this perspective, Benmohamed et al. (2024)

underscored that open data entails institutional frameworks that enable data to generate public value, thereby positioning openness as a function of both technical accessibility and the capacity for practical use within the public sector and beyond.

Writing one year after the launch of the OGP, Kassen (2013) argued that despite its initial focus on providing free access to data within specific digital repositories, the open data movement was evolving into a broader political and policy tool with important implications for governance and accountability. This evolution was exemplified by initiatives such as the launching of the Canada-based open.canada.ca²⁰ and the U.S.-based data.gov²¹ open government data portals, in 2011 and 2009 respectively, which went on to become central to the integrating of open data into government practices aimed at promoting transparency and citizen engagement.

Public bodies are the largest producers, collectors, and distributors of data, be it related to traffic, weather, statistics, budgeting, business, government policies, food inspection, and education quality inspection, to name but a few (Gao et al., 2023; Wirtz et al., 2022; Wirtz et al., 2016; Janssen, 2011). These data are essential for public policy development and public service delivery, as well as being valuable resources for citizens, businesses, and any other interested parties seeking to make informed decisions about any number of topics (Reggi et al., 2022; Janssen, 2011). As such, the provision of open government data is heralded by some as a means of mending the separation between government organizations and citizens (Ballari et al., 2025; Schmidhuber et al., 2021; Purwanto et al., 2020; Cucciniello & Nasi, 2014).

Proponents argue that making government data open can catalyze two complementary outcomes (Begany & Gil-Garcia, 2024; OECD, 2023a; Attard et al., 2015; Ubaldi, 2013; Jetzek et

²⁰ [Open.canada.ca](https://open.canada.ca) is the key platform for accessing a wide range of data, publications, and public records held by the GoC.

²¹ data.gov was launched as a part of the Obama Administration's open government initiative to share data generated by US public agencies.

al., 2012):

1. Enhance willingness on the part of governments to be more open, welcoming more frequent exchanges of views – including oppositional voices – with citizens and other stakeholders.
2. A willingness to share, albeit to a limited extent, authority, thereby contributing to a transformation of the public sector.

The foundational premise here rests in the notion that, by granting the public access to government records, governments become both more open and more efficient insofar as citizen access to this information in the form of open data can catalyze civic participation by mobilizing citizens into accessing the resources they need to augment their level of participation at varying levels of government decision-making, and ultimately improve the quality of their lives (Alexopoulos et al., 2023; Kassen, 2013; Ubaldi, 2013). Another anticipated benefit of open government data and open data is its potential as a catalyst for economic growth insofar as it potentially affords opportunities to stimulate local and national economies by allowing individuals, businesses, and civil society organizations to use public data to produce new products and services (Open Government Partnership, 2022; Gurin, 2014; Kassen, 2013; Ubaldi, 2013).

There are, however, several reasons for wariness when encountering such claims. First, much like the terms, ‘democracy’ and ‘transparency,’ the very notion of open government is contentious, with different stakeholders understanding and using the term in different ways (OECD, 2023a; Ruvalcaba-Gomez, 2019; Ruvalcaba-Gomez et al., 2018). The concept of open government has evolved over time, reflecting both advancements in governance practices and the varying priorities of stakeholders. Clarke and Francoli (2014) observed that early definitions of open government focused narrowly on transparency and accountability. Since then, definitions have expanded to encompass broader objectives, such as public engagement, collaboration, and the integration of digital tools into myriad government activities. For example, the OECD defines open government as a concept that emphasizes transparency, accountability, and citizen

engagement in the functioning of public institutions, aiming to enhance public trust, improve government effectiveness, and ensure inclusive decision-making processes (OECD, 2023a). The evolution signals a shift toward adapting open government to technological advancements and societal demands for inclusiveness in governance. To this end, some approaches emphasize transparency through open data initiatives and proactive information sharing (Nascimento Silva & Nascimento Silva, 2025; OECD, 2023a; Matheus & Janssen, 2020; Ruijter, 2017), while others highlight fostering citizen participation and cross-sector collaboration as central tenets of open government (Schnell et al., 2024; Reggi et al., 2022; Fung, 2015).

Not surprisingly interpretations of open government remain diverse and context-dependent (Nascimento Silva & Nascimento Silva, 2025; Gil-Garcia et al., 2023; OECD, 2023a; Ingrams et al., 2020). Writing in the 20-teens, Ruvalcaba-Gomez et al. (2018) and Gonzalez-Zapata and Heeks (2015) were already pointing out that stakeholders, including public managers, academics, and professionals, often emphasized different facets of open government. Despite certain groups continuing to prioritize accountability and transparency as foundational goals (e.g., Gil-Garcia et al., 2023; Ingrams et al., 2020), others seemingly place greater emphasis on technological innovation, such as open data platforms, to enhance accessibility (e.g., Gao et al., 2023; Linåker and Runeson, 2020).²² These varied definitions illustrate the flexible manner in which open government is understood and its seeming propensity to serve distinct purposes depending upon the priorities of those applying it.

Drawing from a systematic review of 103 theoretical and empirical articles selected from 50 academic journals, Meijer et al. (2012) critiqued the propensity of some actors to equate the

²² Reggi and Dawes (2016) and Morozov (2013), along with more recent studies by Wuttke et al. (2025); Green (2022) have all cautioned against overly technocentric views of open government, warning that an overemphasis on technology may overshadow inclusivity and accountability objectives.

term ‘open government’ with simply sharing government data and information with the public via the internet. They asserted, more than one decade ago, that conceptualizations of open government all too frequently tended to approach openness primarily in informational terms (i.e., vision) when, in fact, openness also needs to be considered in interactive terms (i.e., voice). This led them to call for designing open government initiatives in which the level of government openness was expressed in the combination of transparency and interactivity, with a focus on immediate feedback and interaction. Such an approach implies that for open government to be effective, it must both provide information and facilitate meaningful engagement and dialogue between citizens and government officials. In such a scenario, citizens would presumably be able to keep varying levels of government accountable because they would have access to information about government actions as well as a means of communicating with those comprising said level of government. It merits noting, however, that access to channels or mechanisms for transforming the information into real consequences appears to have been overlooked.

A second reason for skepticism in the presence of a suggested linear relationship between the online publishing of data and attaining transparency outcomes pertains to the intended users of the data (i.e., citizens). Specifically, realizing the promised benefits of both open government data and open data often is constrained by issues of data quality and limitations pertaining to individuals’ cognitive and technological capacities and competencies. There also is a need to address how data is presented and formatted to ensure it is accessible and comprehensible to diverse audiences.²³ As noted by Lee et al. (2020), Halachmi and Greiling (2013), Janssen et al. (2012), and Hood (2010), the publishing large amounts of government data can overwhelm and distract the public and, potentially, serve as an impediment to transparency. Janssen et al. (2012),

²³ For a discussion of the challenges associated with developing and implementing an open government in an officially English/French bilingual jurisdiction see, Scassa and Singh (2015).

for instance, noted more than one decade ago that the conflating of publishing with transparency rests at the heart of what they called the myth of open data. In both cases, people's ability to make purposeful use of any data provided is taken as a given. These authors further posited that, the 'publishing data = transparency' lens overlooks the fact that users have different levels of expertise, understanding, and capabilities. Put simply, effectively engaging with some types of data requires advanced statistical knowledge and/or other technical skills as well as an understanding of the underlying data; something not available to all citizens. In such instances, the availability of more government information may actually exacerbate inequalities in access and understanding, leading to information overload or misinterpretation, rather than enhancing transparency and citizen participation.

Emphasizing that the release of open data, as part of open government initiatives, has yet to demonstrate having had any meaningful impact on the public understanding of complex issues, policies, and decision-making, Francey and Mettler (2021), Schwoerer (2022), and Evans and Campos (2013) all caution against succumbing to the allure of open data myths. They each contend that publishing government data without providing a full description of how it is collected and managed actually limits citizens' ability to determine the relevance and reliability of such data and, in so doing, has little-to-no bearing on augmenting government transparency.

Writing about the U.K. experience with open budgeting, Heald (2013, 2012, 2006) advanced the notion of a 'transparency illusion' to describe situations wherein despite seeming to be increasing when measured by certain indexes, in actuality the effectiveness of transparency may be radically different. In so doing, he highlighted the gap between transparency that is meant to exist (i.e., nominal transparency), in his example the U.K.'s then very high-ranking in fiscal transparency by international standards versus its fiscal transparency in practice (i.e., effective

transparency) which was characterized by expected benefits not materializing. This, as he noted, in turn suggested a need for paying particular attention to the content specifications of transparency indexes given that they may well be better suited to capturing nominal rather than effective transparency.

Echoing the distinction advanced by Heald (2006), Cucciniello and Nasi (2014) distinguished between ‘effective transparency’ and ‘formal transparency,’ suggesting the former occurs when the government publishes what is useful for citizens instead of publishing only that which it legally is obligated to publish (i.e., formal transparency). They further contend that stakeholders' involvement in transparency initiatives may result in greater levels of effective transparency insofar as such engagement directly pertains to the value of the content, user feedback on the released information and, ideally, their involvement in implementing transparency initiatives.

The divergent perspectives outlined above make clear that open government data cannot be equated with open government. They also point to a need for greater clarity about open government and what it entails, as well as its relationship to transparency. Expounding upon this assertion, Clarke and Francoli (2014) have argued that practitioners, policy makers, and scholars all too frequently approach open government as a cohesive whole without considering the “homegrown flavours” that differentiate how it is operationalized on a day-to-day basis. They proposed three benefits of improved definitional clarity:

1. It would provide stakeholders with a clear grasp of the promises and actions made by governments in implementing open government reforms.
2. It also would provide those interested in assessing open government with the diversity of meanings the concept has acquired and, ideally, how it is being used in particular contexts.
3. It would facilitate the internationalizing of open government standards, including those that are set by OGP.

For the purposes of this dissertation, applying the notion of ‘homegrown flavour’ offers three advantages when interrogating how transparency is manifested within the GoC’s procurement activities. First, it gives pride of place to the distinction between accessing government information and being able to effectively use and understand such information. Second, it acknowledges that Cucciniello & Nasi (2014)’s notion of effective government transparency is conditioned by a wide range of cultural, economic, political, social, and technological factors. Put simply, unless governments provide information in user-friendly formats,²⁴ citizens, civil society organizations, and other stakeholders may not be able to assess the extent to which their demands for greater government transparency are being fulfilled.

Third, the notion of ‘homegrown flavour’ suggests a conceptual frame through which to investigate openness within the context of the Canadian government’s procurement activities. According to Meijer et al. (2012, p. 13), openness is a quality referring to, “the extent to which citizens can monitor and influence government processes through access to government information and access to decision-making arenas.” This definition is anchored in the premise that, much like transparency, open government often hinges upon the existence and the synergistic functioning of vision (i.e., as in what is made visible) and voice (i.e., as in whose voice is heard). It also directly ties in with the notion that access to information is not an end in itself, but rather, a means to other ends, such as citizen oversight and engagement in the policy-making process. Understood in this manner, openness encompasses both being open to participation and the accessibility of information for interested stakeholders such that they may comprehend and apply the released information to make their own decisions regarding, and/or contribute to the making

²⁴ For some critics, data that has been reformatted or modified by government bodies to make it more user-friendly is no longer considered ‘open’ data. This is because it may be seen as altered from its original, raw state, which raises concerns about the transparency and integrity of the information. For more on this perspective see, the *Open Data Handbook* at: <https://opendatahandbook.org/guide/en/what-is-open-data/>

of, government policies.

Having set out some of the principal interconnections between the concepts of transparency and open government, I now turn my attention to the technological and human elements of federal-level public procurement within the Canadian context.

2.3 Federal-level E-Procurement Platforms

Until late November 2024, in Canada, the [Buyandsell.gc.ca](https://buyandsell.gc.ca) platform functioned as a central hub for federal-level procurement activities. Established in 2013,²⁵ this publicly accessible platform was designed by Public Services and Procurement Canada (PSPC) to simplify access to federal procurement information to support the federal government's commitment to enhancing procurement transparency and efficiency (Public Services and Procurement Canada, n.d.). In November 2024, the platform was migrated to [Canadabuys.canada.ca](https://canadabuys.canada.ca),²⁶ which is no longer publicly accessible²⁷ but which continues to provide a centralized interface, enabling suppliers to view and respond to procurement opportunities, track contract awards, and manage procurement processes electronically.

A second platform, *Proactive Disclosures – Contract Dataset*, plays a crucial role in making information about government contracts and expenditures publicly available. Established in 2015, this platform was developed in-house by the Treasury Board of Canada Secretariat (Treasury Board of Canada Secretariat, n.d.). According to Government of Canada (n.d.), this

²⁵ Prior to June 2013, the GoC relied on [merx.com](https://www.merx.com), a privately operated platform, as its official tendering service provider. This platform enabled businesses to access public tenders and compete for contracting opportunities across federal, provincial, and municipalities, academic institutions, schools, and hospitals (MASH) sectors. See, <https://www.merx.com/public/faq>

²⁶ Given that the migration occurred several months after the fieldwork for this project had been completed, with few exceptions, in the remainder of the dissertation I refer to *Buyandsell.gc.ca* rather than *Canadabuys.canada.ca*.

²⁷ Access to the platform is now contingent upon users being legally registered businesses. See, <https://canadabuys.canada.ca/en/getting-started/preparing-sell-government>

platform aims to boost transparency and accountability by making data about government spending—such as contracts awarded and their associated values—readily available to the public. The GoC maintains that, together, these two platforms foster greater openness in its procurement activities and ensure that information relating to public funds is accessible and comprehensible to interested parties (Government of Canada, n.d.; Public Services and Procurement Canada, n.d.).

Despite the GoC's framing of both platforms as advancing transparency and accessibility, the information provided at each site makes clear they each serve distinct functional purposes. Buyandsell.gc.ca (now Canadabuys.canada.ca) is typically presented as an operational tool that supports the transactional aspects of procurement activities (e.g., tender publication and bid submission) whereas the *Proactive Disclosures – Contract Dataset* is positioned as a repository for finalized contract information. However, and as is discussed in greater detail later in this dissertation, these officially delineated roles do not fully reflect how different stakeholders interpret or engage with the platforms in practice.

The distinction also raises the question as to whether distinct functional purposes require distinct evaluative criteria. In this instance, the answer is no. Despite the platforms serving distinct operational functions, attributes such as accessibility, clarity, and the quality of procurement information are integral elements of visibility regardless of the platform's specific purposes. Furthermore, as discussed in subsequent chapters, stakeholder engagement (i.e., voice) often blurs the formal boundaries between these platforms, reinforcing the use of common visibility criteria as an evaluative lens.

Beyond these centralized procurement platforms, the GoC's broader procurement system also includes department-specific systems tailored to meet their unique operational needs. Some examples include:

- Defence Construction Canada (DCC) Procurement System (<https://www.dcc-cdc.gc.ca/>), which relies on *merx.com*, an independent private sector tendering service used to manage procurement for defence infrastructure projects, such as military facilities, construction, and engineering services.
- Indigenous Services Canada (ISC) Procurement Initiatives (<https://www.canada.ca/en/indigenous-services-canada.html>), including the Indigenous Business Directory (IBD).
- Canada Revenue Agency (CRA) Procurement Portal which handles procurement for IT systems and tax administration services (<https://www.canada.ca/en/revenue-agency/corporate/about-canada-revenue-agency-cra/procurement-cra.html>).
- Shared Services Canada (SSC) Procurement System (<https://www.canada.ca/en/shared-services.html>) which is used to manage government-wide IT infrastructure and telecommunications procurement.

One of the claimed benefits of e-procurement platforms is their capability to maintain levels of information access, process automation, and data management that, in turn, are meant to foster more transparent and effective procurement environments. Mahuwi and Israel (2024), Eger and Smith (2021), and Richard (2021), for example, all contend that consolidating procurement-related information—such as details about contracting opportunities, awarded contracts, and policies—into centralized and accessible platforms enhances access to, and visibility of, relevant information for stakeholders. They also posit that the automation features of e-procurement platforms are notable for reducing manual errors and biases in the procurement process. Together, these authors suggest that by standardizing procurement procedures e-procurement platforms may augment fairness by ensuring the consistent application of rules and other relevant criteria. Additionally, the automating of audit trails allows, in principle at least, for more rigorous monitoring and review of procurement activities, which can, in turn, help to mitigate the risks of corruption.

A second claimed benefit of e-procurement platforms is their ability to provide users with real-time updates which, in turn, may enhance the responsiveness of the procurement process and ensure that stakeholders remain updated on developments as they occur (Akaydin, 2023; Ferreira & Amaral, 2016). Lastly, e-procurement platforms facilitate data management through the electronic storage of procurement documents. Bosio et al. (2023), Mangitung et al. (2022), and Perez (2022), maintain this feature strengthens data integrity and offers a channel for ensuring comprehensive, auditable records of procurement activities, thereby guaranteeing all procurement transactions are accurately recorded and readily accessible for review.

This said, realizing the transparency-related benefits outlined above cannot be taken as a given. Several factors impact the likelihood and extent to which such benefits may be actualized

through the implementing of e-procurement platforms. Chen et al. (2022), Hua (2022), Amalia (2017), and OECD (2016a) all identify challenges spanning from system management to technological constraints to user engagement considerations as potential impediments to the realization of transparency and other objectives via e-procurement platforms. One notable issue in this regard is data quality and completeness. As noted by Soylyu et al. (2022), OECD (2016a), and Osei-afokwa (2014), the effectiveness of e-procurement platforms in augmenting transparency is heavily influenced by the quality of information available to users. Incomplete information, such as missing details in solicitation documents or incomplete contractual terms, present challenges during bid evaluation and contract management. Such gaps also contribute to poor decision-making and diminished transparency. Moreover, a lack of standardization in data reporting practices can exacerbate these types of shortcomings insofar as inconsistent formats and reporting methods hinder the aggregation and comparison of procurement information, thereby further undermining transparency and accountability (Janssen & Helbig, 2018; Futia et al., 2017). Accessibility issues present yet more challenges. Both Goggin et al. (2017) and Scheerder et al. (2017) identified disparities in access to digital tools and reliable internet connectivity as barriers that restrict stakeholder engagement and limit transparency. Subsequent research by Kiula and Kinisa (2023) and Mackey and Cuomo (2020) reinforced these observations.

In the Canadian context, access to sufficient bandwidth and appropriate digital tools remains a challenge, particularly for rural and Indigenous communities. Ahmmed et al. (2022), Koch (2022), and McMahon et al. (2021) highlight how connectivity-related barriers restrict engagement in online activities, ultimately hindering effective stakeholder participation in a wide array of online activities. Usability issues, such as complex user interfaces and cumbersome navigation paths, can also contribute to reduced levels of user engagement and satisfaction (Mior

Ibrahim, et al., 2023; Yusof, et al., 2022). Outdated software and rigid system designs are yet more variables that may undermine the capacity of e-procurement platforms to enhance transparency and operational efficiency (Li, 2019; McCue & Roman, 2012; and Norgaard & Hornbcek, 2010). The latter challenges disproportionately affect certain stakeholder groups, particularly small businesses, who, when compared to their larger counterparts, may face financial and technological constraints that complicate their adoption and effective use of e-procurement platforms (Naeem, 2021).

Another central challenge for any e-procurement platform rests in fostering sustained levels of stakeholder engagement. Such engagement entails ongoing and active stakeholder participation in procurement activities, including providing input during decision-making processes and maintaining consistent interaction with the platform. The presence of effective feedback mechanisms is necessary to enabling stakeholders to voice concerns, share suggestions, and contribute to enhancing the transparency and efficiency of procurement practices. As shown by Mergel (2018) and Peixoto and Fox (2016), poorly designed feedback features can discourage engagement by limiting users' ability to provide meaningful input about procurement opportunities and decisions. Moreover, even if feedback mechanisms are present, they may not be used which, in itself, contributes to diminishing transparency and lower levels of platform effectiveness (Ianniello et al., 2019).

Lastly, compliance with legal standards is crucial for ensuring the functionality and legitimacy of e-procurement platforms. However, adherence to such requirements can negatively impact day-to-day transparency and stakeholder participation. Platforms operating across multiple jurisdictions, for example, must navigate various legal standards, including accessibility and language requirements, which can be very complex and burdensome (Schoenmaekers, 2020;

Cunha et al., 2019; McCue & Roman, 2012). Fragmentation and lack of interoperability between different systems may further complicate adherence to legal frameworks, affecting the accessibility of procurement processes for certain stakeholders (Chbeir et al., 2024; Soylu et al., 2022; Rice, 2015; Varney, 2011).

2.4 Stakeholder Engagement in Public Procurement

Throughout the past two decades, several studies and reports have noted the importance of both identifying and categorizing the roles of various stakeholders in public procurement processes, and of evaluating stakeholder engagement in procurement-related activities (Ajibade et al., 2025; Mutebi et al., 2024; Prebanić & Vukomanović, 2023; Chow & Leiringer, 2021; Daigneault et al., 2012). Together, these two activities are seen as essential to improving accountability, enhancing transparency, and ensuring that procurement systems effectively serve the diverse interests of stakeholders. For example, to balance operational priorities with broader societal and economic objectives, the OECD has long emphasized the importance of identifying the key stakeholders that public procurement primarily serves (OECD 2020, 2007). According to this report, such identification is crucial to enabling policymakers to better navigate the complex dynamics of competing interests of stakeholders including, end-users, government entities, the private sector, the media, and members of the public. When done successfully, the report suggests, procurement systems respond effectively to these diverse needs thereby, simultaneously fostering public trust in government operations and addressing both efficiency goals and broader objectives such as fairness, accountability, and transparency.

Building on the OECD's emphasis on identifying stakeholders and addressing their diverse interests, Hui et al. (2011) offered a framework centred on accountability mechanisms to address issues of corruption, transparency deficits, and cronyism within Malaysia's public procurement

system. In examining the roles and responsibilities of various stakeholders, they categorized actors into four groups in accord with the level of accountability they demand from procurement processes: compliance-driven (e.g., auditors), those addressing malpractice (e.g., procurement officers), advocates for fair contract access (e.g., contractors), and those promoting broader social impact (e.g., civil society organizations). According to the authors, the application of their taxonomy facilitates more targeted responses to the specific needs of each group thereby promoting fairness and transparency in procurement processes and helping ensure the distinct expectations and concerns of different actors are addressed.

In their examination of procurement reforms across various jurisdictions, including Chile, the European Union, and the United States, Schooner et al. (2011) categorized stakeholders into ‘inside’ and ‘outside’ groups, in accord with the nature of their involvement in the procurement process. They labelled government officials and procurement officers as ‘inside’ because they are involved in the planning, execution, and decision-making aspects of the procurement process. Private sector and civil society actors were labelled ‘outside’ because they engage with procurement by responding to tenders, monitoring outcomes, or participating in advocacy and oversight activities.

The World Bank Group (2016), through its Benchmarking Public Procurement Initiative, examined how regulatory frameworks influence stakeholder engagement in private sector participation, competition, and transparency in procurement processes across 180 economies. Highlighting their differing priorities, its analysis categorized stakeholders into three groups: private sector ac, government entities, citizens. According to this taxonomy, private sector actors seek to maximize procurement opportunities to enhance their business prospects, government entities prioritize achieving value for money to ensure efficient and effective use of public

resources, and citizens emphasize transparency and accountability, particularly to promote equitable and responsible resource allocation.

Similarly, in their examination of how stakeholders' roles evolve through different stages of the procurement process, Cravero (2019) categorized stakeholders into private suppliers, government actors, and non-governmental organizations (NGOs). The described private suppliers as contributing primarily during the bidding and delivery phases, with government actors managing the internal processes of procurement, including planning and execution. They noted that despite being less involved, operationally, NGOs were important advocates for transparency and sustainability, particularly during the planning and post-execution stages of procurement. Importantly, Cravero observed that the stakeholders' roles were not static, with responsibilities and engagement levels often shifting at different stages of the procurement process.

Examining participatory initiatives in procurement the Latin American context, Cruz-Rubio (2020) categorized stakeholders into formal and informal groups, emphasizing their complementary roles. Formal stakeholders included government agencies and private suppliers operating within institutional frameworks and who are integral to procedural procurement functions. Informal stakeholders included advocacy groups and the media; entities associated with enhancing transparency and accountability by fostering oversight and shaping procurement practices beyond institutional boundaries.

Peel et al. (2022) explored stakeholder participation in public procurement processes in Namibia highlighting consultative mechanisms through which formal actors (i.e., procurement authorities, supplier firms) and informal actors (i.e., end-users and civic representatives) contribute to procurement decision-making. Emphasizing the link between stakeholder inclusion and procurement credibility, the authors argue that structured engagement supports efficiency and

aligns national procurement practices with broader transparency and anti-corruption objectives. Their findings reinforce the importance of designing participatory frameworks that are sensitive to institutional context and stakeholder diversity. Echoing this view, Valenzuela et al. (2024) examined the inclusion of Indigenous peoples in public procurement markets across Latin America and the Caribbean, identifying systemic barriers that have historically excluded Indigenous communities from procurement opportunities. Emphasizing international best practices aimed at fostering their participation, these authors stress the importance of implementing tailored institutional frameworks and regulations to ensure that procurement processes are inclusive and reflective of diverse stakeholder needs.

Collectively, the studies outlined above underscore the expanding dimensions of stakeholder engagement in public procurement and point to a growing recognition of the benefits of developing inclusion-oriented policies tailored to addressing structural and social barriers that different groups encounter in this domain.

For the purposes of this dissertation, I have elected to categorize stakeholders into two groups in accord the immediacy with which they interact with and influence the procurement process: direct and indirect stakeholders. The former are those who are actively and immediately involved in the procurement process and whose actions directly influence procurement outcomes.

They include:

1. Private sector actors, including suppliers and contractors who directly participate by competing for contracts through bidding or electronic platforms, driving competition, cost-effectiveness, and innovation.
2. Government entities, such as procurement officials and policymakers who directly influence procurement policies, ensure compliance with legal and ethical standards, and establish procurement frameworks.
3. Some civil society organizations who monitor procurement processes, advocate for reforms, and act as watchdogs to safeguard public interests and promote transparency. Their engagement mechanisms range from conducting audits to engaging in competitive bidding to participatory monitoring to hosting electronic platforms to participating in public consultations.

Indirect stakeholders are those who engage with the procurement process in ways that are less direct but nonetheless influential. Those falling into this category include citizens, international organizations, and industry associations. The information provided in Tables 2.1 and 2.2 offers a summary of the stakes, interests, engagement mechanisms, and the roles and impacts of the actors discussed above. The three direct stakeholder groups – private sector businesses, government officials, and civil society organizations – are the most relevant to the purposes of this dissertation. This categorization also aligns with widely recognized international frameworks for analyzing stakeholder roles, transparency, and engagement dynamics in public procurement. Both the OECD and the OGP identify government, the private sector, and civil society as the principal actors shaping procurement transparency (OECD, 2023b; OGP, 2023). As such, I opted to center the analysis on the perspectives of these three stakeholder groups, consistent with the Canadian context, where commitments to transparency emphasize collaboration among government, civil society, and the private sector as central stakeholders (Government of Canada, n.d.). It also merits noting that for the purposes of this dissertation I have opted to include journalists and scholars within the civil society category.

2.5 Transparency in Public Procurement in Canada and Elsewhere

Expenditures associated with public procurement can have marked impacts on national economies, limiting the amount of funds available for achieving other economic and social objectives. It comes as no surprise, then, that the need for transparency in this domain is widely recognized (Felizzola et al., 2024; Khorana et al., 2024; Soylu et al., 2022; Kim et al. 2019; Transparency International, 2019a; Borowiec et al. 2017; Georgieva, 2017; OECD, 2016b; Schooner et al., 2011; Kinsey, 2004; Thai, 2001).

Given the importance of public procurement activities, the availability of procurement

information and other transparency measures (e.g., open access to tender documents, real-time publication of contract awards, and stakeholder feedback mechanisms) is frequently associated with realizing certain social and economic benefits. Although the two types of benefits go hand in hand, for reasons of analytical clarity, I am distinguishing one from the other. In terms of social benefits, the need for transparency within the context of public procurement takes on heightened importance precisely because the occurrence of wrongdoings and corruption in this domain is often linked to a lack of information about the workings of the public sector (Felizzola et al., 2024; Zuniga, 2018; Bertot et al., 2010; Lindstedt & Naurin, 2010; Kolstad & Wiig, 2009).

Table 2.1 Direct Stakeholder Engagement in Public Procurement Processes

Direct Stakeholders	Stake	Interest	Mechanisms for Engagement	Role and Impact	References
Government	<ul style="list-style-type: none"> ➤ Influence procurement policy ➤ Ensure legal, ethical, and procedural compliance ➤ Establish procurement frameworks 	<ul style="list-style-type: none"> ➤ Ensure transparency, fairness, and competition ➤ Promote public trust 	<ul style="list-style-type: none"> ➤ Audits and compliance reviews ➤ Public reporting systems ➤ Open procurement platforms 	<ul style="list-style-type: none"> ➤ Ensure procurement aligns with public policy objectives ➤ Influence fairness, transparency, and competition 	Mutangili (2024); OCP (2024); Hoekman (2022); Cruz-Rubio (2020); Cravero (2019); Mukura et al. (2016); Hui et al. (2011); Schooner et al. (2011)
Private Sector Actors	<ul style="list-style-type: none"> ➤ Access procurement opportunities ➤ Compete for contracts 	<ul style="list-style-type: none"> ➤ Ensure fair and predictable processes 	<ul style="list-style-type: none"> ➤ Competitive bidding ➤ Pre-qualification systems ➤ Electronic procurement platforms 	<ul style="list-style-type: none"> ➤ Drive competition, cost-effectiveness, and innovation ➤ Reduce corruption and favoritism 	(Mutangili, 2024a) Cruz-Rubio (2020); Hui et al. (2011); Schooner et al. (2011)
Some Civil Society Organizations	<ul style="list-style-type: none"> ➤ Monitor procurement processes ➤ Advocate for reforms 	<ul style="list-style-type: none"> ➤ Safeguard public interest 	<ul style="list-style-type: none"> ➤ Participatory monitoring ➤ Public consultations ➤ Policy advocacy 	<ul style="list-style-type: none"> ➤ Act as watchdogs for transparency and fairness ➤ Address inefficiencies and corruption 	Liu et al. (2021); Cruz-Rubio (2020); Cravero (2019); Transparency International (2019)

Table 2.2 Indirect Stakeholder Engagement in Public Procurement Processes

Indirect Stakeholders	Stake	Interest	Mechanisms for Engagement	Role and Impact	References
Citizens	<ul style="list-style-type: none"> ➤ Ultimate beneficiaries ➤ Influence procurement through public discourse 	<ul style="list-style-type: none"> ➤ Ensure public funds are used effectively 	<ul style="list-style-type: none"> ➤ Civic engagement ➤ Public feedback mechanisms ➤ Advocacy through CSOs 	<ul style="list-style-type: none"> ➤ Hold governments accountable through elections and civic participation ➤ Influence procurement policies through public discourse 	OECD (2024); (Hossain et al., 2018); OECD (2016a); World Bank Group (2016)
International Organizations	<ul style="list-style-type: none"> ➤ Promote global procurement standards ➤ Provide technical assistance 	<ul style="list-style-type: none"> ➤ Promote transparency and anti-corruption efforts 	<ul style="list-style-type: none"> ➤ Technical assistance ➤ Advocacy ➤ Monitoring 	<ul style="list-style-type: none"> ➤ Influence procurement systems by offering technical expertise ➤ Promote global best practices 	OCP (2024); OECD (2020); World Bank Group (2016)
Industry Associations	<ul style="list-style-type: none"> ➤ Advocate for industry-specific interests ➤ Ensure member needs are addressed 	<ul style="list-style-type: none"> ➤ Ensure fair procurement processes 	<ul style="list-style-type: none"> ➤ Policy advocacy ➤ Industry collaboration ➤ Training programs 	<ul style="list-style-type: none"> ➤ Influence procurement policies to reflect industry standards ➤ Represent collective business interests 	Moshood (2025); Hoekman (2022); Hui et al. (2011); Sullivan (2010)

For instance, Felizzola et al. (2024), Vian (2020), Francis and Armstrong (2017), Lichand et al. (2011), and Auriol (2006) all argue that despite the huge amounts of public money involved, the abuse of entrusted power for private gain (i.e., corruption) is a major problem because taxpayers have only very limited and weak ability to monitor public procurement activities. Such challenges persist in a wide range of contexts and are manifest in ongoing gaps in procurement oversight, including insufficient transparency, inadequate monitoring mechanisms, and limited public accountability measures (see also, Basdevant et al., 2022; Vian, 2020; Transparency International 2019b; Amin, 2017; OECD 2016b). Expounding upon such concerns, Kirn et al. (2019) maintain that establishing more transparent and effective public procurement systems benefits government, private sector, and civil society actors because having them in place saves public resources, reduces the likelihood of conflicts of interest, and offers the potential for enhancing trust between private individuals and state institutions.

On the economic side, transparency in public procurement is equally crucial for ensuring effective use of public funds. Opaque procurement practices typically lead to higher costs for government budgets and taxpayers, hinder firms from entering the market and, in turn, potentially contribute to awarding contracts to undeserving enterprises (Mohammad et al., 2021; Anderson et al., 2018; Asliana, 2012; Ohashi, 2009). At play here are issues associated with promoting a level playing field for competitors and enhancing stakeholders' awareness of procurement opportunities by publishing and distributing relevant information in a timely manner. As noted by Mahuwi and Israel (2024), Dorasamy and Fagbadebo (2021), and Osei-afokwa (2014), ensuring transparency in the procurement process is essential for contracting efficiency because it enhances public procurement competitiveness, which ultimately helps improve the overall effectiveness and efficiency of government spending. There is, however, a paradox at play here insofar as

procurement information can also facilitate corruption by helping those willing to do wrong identify government officials with whom connections may be established to gain an unfair advantage in government contracting (Burguet et al., 2024; Podkolzina et al., 2012; Kolstad & Wiig, 2009). Likewise, a full description of transparency measures may provide potentially corruptible officials with the knowledge needed to circumvent such measures (Purwanto & Emanuel, 2020; Toukan, 2017; Osei-afokwa, 2014).

In Canada, strategies aimed at engaging with stakeholders and augmenting participation in the public procurement domain tend to range from public consultations and hearings (e.g., Open Government Consultations, PSPC Industry Engagement Sessions, and Canada's Procurement Strategy for Aboriginal Business) to more institutionalized forms of participation, such as the creation of advisory committees and oversight bodies (e.g., The Office of the Procurement Ombud, Canadian Public Procurement Council (CPPC), and PSPC Advisory Committees). Ultimately, the success of these initiatives in terms of enhancing transparency, fostering trust between stakeholders and government, and improving procurement outcomes depends upon the depth of interaction between government bodies and relevant stakeholders.

Engaging stakeholders in public procurement is heralded as likely to bring about three positive outcomes (Xiang, 2024; Cruz-Rubio, 2020):

- generating a positive impact on the use of public resources and increasing value for money;
- increasing trust in government with regard to the administration and management of contracting and purchasing; and
- creating opportunities for the inclusion for those who have hitherto been marginalized from the procurement process.

Such claims, however, appear to be based on somewhat idealized notions insofar as they resonate with open data myths and seemingly take as given that opening avenues for participation will *ipso facto* yield broad benefits. In practice, realizing the promised benefits of enhanced participation is

contingent upon the level and quality of interaction between government and stakeholders. Put simply, not every participatory strategy has the same purpose or scope, nor do such strategies affect all stakeholders equally (i.e., homegrown flavours). Nonetheless, and as recognized by Meijer et al.'s (2012) definition of openness, the participatory dimension of transparency is pivotal to ensuring that procurement processes are inclusive of interested actors.

Although public procurement transparency was not a major focus in Canada's first OGP National Action Plan (2012–2014), it did feature more prominently in subsequent action plans, albeit with varying degrees of emphasis. Specifically, it became a distinct priority in the second National Action Plan (2014–2016) which advanced 12 commitments aimed at enhancing access to information and fostering transparency in government activities, of which one, *Commitment 3: Open Contracting*, specifically focused on improving transparency in federal procurement processes. Key milestones under this commitment included the introduction of a centralized database for contracts exceeding \$10,000, detailed disclosures of contract amendments, and piloting the Open Contracting Data Standard (OCDS) on the Buyandsell.gc.ca platform (Treasury Board of Canada Secretariat, 2014). Together, these measures were aimed at improving the accessibility and consistency of procurement data, fostering greater accountability, and encouraging public participation. The OGP/IRM evaluation²⁸ of the plan's implementation recognized these efforts as a step in the right direction, but noted that delays in updating procurement data, inconsistent practices across departments, and limitations in the usability of published data impeded the ability to fully realize the goals of transparency and engagement (Francoli, 2016).

²⁸ The IRM is an independent body tasked with producing reports and assessing the design and implementation of the commitments set out in the national action plans of OGP participating governments. See, <https://www.opengovpartnership.org/people/independent-reporting-mechanism-irm/>

Continuing the focus on procurement transparency, Canada's third national action plan (2016–2018) included a commitment oriented toward the disclosing of information about government spending and procurement; *Commitment 9: Enhance Openness of Information on Government Spending and Procurement*. Within this commitment, two elements of note were its fourth milestone which aimed at enhancing the Buyandsell.gc.ca platform's functionality and usability through a pilot initiative oriented around augmenting details contained in contract records, and the fifth milestone which involved PSPC's participation in a case study showcasing its application of the Open Contracting Data Standard (Government of Canada, 2016). The OGP/IRM evaluation of the action plan's implementation noted that access to procurement data increased because of these initiatives but that the data's usability and lack of accompanying contextual information (i.e., definitions, contract scopes, explanatory notes) remained impediments to the public's ability to engage meaningfully with it. To this end, the IRM encouraged the GoC to focus on improving the presentation of all government data to better serve the needs of stakeholders and facilitate more informed public participation (Karanicolas, 2018).

In its fourth action plan, 2018–2020, the GoC continued its focus on fiscal transparency and broadened the accessibility of procurement information. *Commitment 2: Financial Transparency and Accountability*, sought to enhance transparency in government finances, particularly through open contracting, with the aim of ensuring that Canadians have access to consistent, timely, and accessible information about public spending. It, too, had two key milestones. The first, *Milestone 2.3: Ensure Canadians have access to open data on GoC procurement*, involved piloting the implementation of the Open Contracting Data Standard (OCDS) and publishing detailed procurement data. The second, *Milestone 2.4: Explore adoption of common contracting data standards across Canada*, aimed at facilitating discussions and further

exploring the adoption of standardized contracting data across federal, provincial, and territorial governments (Canada Treasury Board, 2018). The intended outcome was to ensure that procurement data was both accessible and contextually relevant, allowing stakeholders to better understand procurement decisions. Paralleling its observations about the two prior action plans, the OGP/IRM evaluation of the fourth plan acknowledged the positive nature of these steps but called out commitment's lack of ambition and the failure to identify measurable intended outcomes (Paré, 2020). It also noted that the timely publication of procurement data and limited stakeholder engagement, continued to impede the transformative potential of these initiatives (Paré, 2020). These observations paralleled those advanced by Transparency International's (2019a)²⁹ *Recommendations on Open Contracting for OGP Action Plans* which emphasized the need for greater efforts at creating public procurement systems with which informed citizens can make sense of data and provide informed feedback.

In the wake of the COVID-19 pandemic and the resulting shifts in government priorities and resources, the GoC did not release an OGP national action plan for the 2020–2022 period. Instead, and in accord with the OGP's offer to extend members' completion timelines for countries with action plans due for completion on June 30, 2020, the GoC officially completed its 2018–2020 national action plan in June 2021. The fifth plan (2022–2024) built on prior commitments and milestones and introduced a few new initiatives aimed at enhancing fiscal, financial, and corporate transparency, although none of which dealt explicitly with procurement. These include the establishment of a beneficial ownership registry (Commitment 3) and renewed efforts to

²⁹ Transparency International is a global organization founded in 1993 that currently operates in some 100 countries to combat corruption by promoting transparency, accountability, and integrity. See, <https://www.transparency.org/en/about>. The OGP collaborates with Transparency International in efforts to integrate anti-corruption commitments into member countries' national action plans. See, Marczyński and Marin (2018).

promote open data standards (Commitment 5).

Promoting the creation and implementation of open contracting policies in member countries is a key avenue of the OGP's anti-corruption efforts. These efforts aim at ensuring full disclosure of procurement data and enabling stakeholder engagement and oversight throughout the procurement process (Open Contracting and Public Procurement, n.d.). The Open Contracting Partnership (OCP) describes open contracting as being “about publishing and using open, accessible and timely information on public contracting to engage citizens and businesses to fix problems and deliver results” (OCP, n.d.). The effectiveness of these transparency efforts depends upon the quality and depth of interactions between government entities and stakeholders (Mabillard & Zumofen, 2021; Awoke & Singh, 2020; Futia, et al., 2017). The advances made by the Canadian government in enhancing transparency through its OGP initiatives remain subject to criticisms about their implementation and the claimed impacts of these measures (Lauriault et al., 2021; Edelmann & Francoli, 2020; Paré, 2020). In terms of procurement, inadequate oversight limited public accountability, and difficulties in disseminating procurement information constitute ongoing gaps in actualizing transparency in Canada's system of public procurement. With this in mind, the central research question guiding this dissertation is:

How are vision and voice manifest in GoC procurement activities that occur via its two main procurement platforms?

In seeking to address this question, the two following sub-questions were used to guide the research:

- (i) *In what ways, and to what extent is information about public procurement made accessible and available to stakeholders?*
- (ii) *In what ways, and to what extent do the stakeholders participate in the government procurement process?*

2.6 Conclusion

The discussion in this chapter has reviewed literature dealing with various aspects of transparency, open government initiatives, and stakeholder engagement in public procurement. The discussion outlined how the concept of transparency has evolved from focusing foremost upon information disclosure to include considerations relating to information usability, stakeholder participation, and value creation. Within the context of e-procurement platforms, the operationalization of transparency is understood as also incorporating matters of technological accessibility and the capacity of users to make meaningful use of available information. Government commitments to open contracting, private sector competition requirements, civil society oversight mechanisms, and citizens' expectations of accountability all play a role in influencing whether transparency initiatives achieve their intended outcomes. In the next chapter, my attention turns to the conceptual framework employed to guide the investigation of how effectively transparency has been operationalized in Canada's public procurement activities.

Chapter 3: A Conceptual Framework for Investigating Procurement Transparency

The discussion in this chapter sets out the conceptual framework used to investigate the central research question guiding the study. The chapter begins with a discussion of transparency as a multidimensional concept, distinguishing between the availability of procurement information and the conditions for meaningful stakeholder involvement in decision-making. From there, I move on to discussing how I have elected to extend Meijer et al. (2012) vision and voice framework to incorporate two interrelated dimensions of transparency: the visibility of procurement information and stakeholder engagement in procurement processes. In so doing, I outline how these two dimensions are operationalized using established international benchmarks and assessment tools. It then concludes with a brief summary of the overall discussion.

3.1 A Conceptual Framework for Analyzing Transparency

According to Meijer et al. (2012), the effectiveness of transparency practices is contingent upon stakeholders being able to see inside the workings of government through information that is made publicly accessible (i.e., vision) as well as their capacity to access and participate in policy-making arenas (i.e., voice). For the purposes of this dissertation, I define effectiveness as the extent to which transparency practices enable both access to information and meaningful stakeholder participation, embedding transparency within decision-making processes. This aligns with the view that transparency initiatives are most effective when they promote genuine visibility and actionable insights (Schnell et al., 2024; Schmidhuber et al., 2023; Weil, 2006; Fung et al., 2004) and address the varied goals of stakeholders, such as enhancing accountability or encouraging public engagement (Field, 2017). Effectiveness also depends upon whether transparency initiatives are implemented as planned, with a focus on how stakeholders act upon the disclosed information and how governments respond (Ballesteros et al., 2023; Cahlikova & Mabillard, 2020; Fung, 2014;

McGee, 2010). The discussion below sets out the considerations informing how vision and voice are operationalized within the context of this dissertation.

Meijer et al. (2012) identify three potential relationships between vision and voice: synergistic (mutually reinforcing), complementary (supportive but independent), and undermining (where one weakens the other). In a synergistic relationship, transparency and engagement strengthen one another, enhancing visibility and voice (i.e., engagement). A complementary relationship suggests that each element contributes independently to transparency without necessarily interacting. By contrast, an undermining dynamic emerges when overemphasis on one facet of the dyad detracts from the other (e.g., information disclosure without avenues for engagement). Their framework is based upon the findings of a meta-analysis of 103 theoretical and empirical open government related publications spanning 50 academic journals from several different countries. However, they remain largely silent about the manner in which the relationships between vision and voice are manifest across different stakeholder groups and within specific governance contexts. Indeed, and as noted by Ingrams et al. (2020) and Schnell (2020) Meijer et al.'s (2012) assumptions about the relationship between visibility ('vision') and engagement ('voice') have not been sufficiently subjected to empirical scrutiny. Among other things, my dissertation seeks to address this shortcoming.

3.1.1 Operationalizing Vision

Drawing from Berkelaar et. al., (2017), in this dissertation information visibility is understood as referring to the extent to which information (i.e., content) is available and accessible to interested parties. Availability focuses on whether people can obtain specific types of information they value and have reason to value. Accessibility refers to the efforts needed to acquire the available information. Wenige et al. (2021) and Michener and Bersch (2013) contend that visibility also

incorporates elements pertaining to the completeness and findability of information. This suggests that information availability, accessibility, completeness, and findability are pillars of information visibility. Reflecting this understanding, in examining the implementation of open government data initiatives across OECD countries, —illustrated through cases such as the UK, USA, and the Netherlands—Ubaldi (2013) asserted that, in order for government data to be considered visible by stakeholders, it must meet of the following criteria:

- offered, preferably for free or at least for a reasonable cost;
- downloadable via the internet;
- available in disaggregated electronic forms, with the right to access these formats recognized;
- available in convenient and modifiable forms; and
- discoverable and findable.

Others such as Ghalavand et al. (2024), Taleb et al. (2021), Dong and Ji (2018), Venkatesh et al. (2016), Wirtz et al. (2016), Mäntysalo (2015), and Harrison et al. (2012) have since suggested that when assessing and/or measuring visibility, the above list of criteria should be expanded to include consideration of complementary indicators such as information timeliness, relevance, completeness, comprehensiveness, and usefulness. According to these authors, the additional indicators extend information-related priorities beyond basic accessibility and availability standards to encompass the specific needs and expectations of different stakeholder groups. For example, timeliness ensures that information is up-to-date, relevance pertains to how well it addresses stakeholders' priorities, completeness focuses on whether all necessary information is provided, and comprehensiveness and usefulness gauge the depth and applicability of the information.

When considering indicators such as those mentioned above, it merits noting there is little agreement about how they might be transformed into measurable metrics for assessing information

visibility, and that stakeholder preferences, perceptions, and information visibility requirements vary widely within and across issue domains (Morrison et al., 2025; Cruz-Rubio, 2020; Silva et al., 2019; Schooner et al., 2011). For example, in the public health domain, stakeholders may prioritize access to up-to-date statistics about disease outbreaks and vaccination coverage, especially when these are presented in user-friendly formats that are easy to interpret (Park et al., 2021). Similarly, in the context of environmental sustainability, stakeholders may require detailed data about carbon emissions, including geographic distributions and temporal trends, to inform policy development and advocacy efforts (Samuel et al., 2022). Within a domain such as education, educators and policymakers may focus on comprehensive data about student performance trends, while parents may prefer concise summaries addressing specific concerns, such as literacy rates or graduation outcomes (Zheng & Toribio, 2021). In this dissertation, three categories of stakeholders are of interest:

1. Government: The administrators of public procurement who also retain control over procurement information. Governments are not subject to visibility requirements for accessing procurement-related information precisely because they are the collectors of this information. Making public procurement information visible to interested parties is believed to be in the government's best interest insofar as it contributes, in principle, to efficient use of national resources, fosters high-quality public services, and helps in establishing and maintaining a stable business environment (Transparency International, 2019a). In addition, making public procurement activities visible contributes to governmental efforts at portraying itself as transparent, avoiding corruption scandals, and striving to cement its legitimacy among its citizenry (Felizzola et al., 2024; Khorana et al., 2024; Anderson et al., 2018; Schooner et al., 2011).

2. Private Sector Actors: The primary stakeholder group in government procurement. The roles and interests of private sector actors are tied to their participation in procurement processes and related decision-making, as these activities directly impact upon business opportunities and outcomes. World Bank (2021) and The World Bank Group's (2017) assessment of public procurement regulatory systems in 180 economies identified four information visibility factors affecting the ability of private sector actors to engage in public procurement activities:

- The findability of information about the bid preparation phase (e.g., procurement plans, tender notice, and tender documents) is critical in providing interested parties with the information needed to assess the opportunities for bidding on contracts.
- The accessibility of information in the bid submission phase once a business has decided to bid. This includes information about the requirements for bidding and the possibility of submitting bids online.
- The access to information during bid opening, evaluation, and awarding phase. This includes procedures for opening bids (e.g. online bid opening sessions) and notification and feedback to unsuccessful bidders.
- The availability of information about the management of contracts, including measures relating to modifying and terminating procurement contracts.

The importance of these visibility factors has been further underscored by international monitoring efforts, including the World Bank's Global Public Procurement Database (GPPD),³⁰ which tracks the extent to which governments provide timely and accessible procurement information across all stages—from planning and bidding to contract implementation—thereby supporting comparative assessments and reforms aimed at enhancing transparency and private sector engagement.

3. Civil Society: In addition to being regular users of government information, civil society actors have, in many countries, become active transparency advocates, serving as an oversight

³⁰ The GPPD serves as a centralized repository of procurement data, enabling stakeholders to assess procurement practices globally and promoting transparency through better access to information at all stages of the procurement process. For more details, see <https://www.worldbank.org/en/topic/governance/brief/global-public-procurement-database>

channel of government activities (OGP, 2021; Schnell & Jo, 2019). For example, they play a central role in establishing and advancing the participation and collaboration elements of OGP-related activities.³¹ In seeking to promote and uphold transparency-related objectives, civil society actors often function as investigative and/or reporting bodies that work to make information publicly available to all potentially interested stakeholders. The information visibility needs of civil society tend to revolve around issues of findability, accessibility, and availability at all stages of the procurement process (Transparency International, 2022; Transparency International, 2019a).³²

3.1.2 Operationalizing Voice

The voice component of Meijer et al.'s (2012) framework pertains to the demands of stakeholders to be able to voice their views about that which has been made visible to them. It centers on the extent to which interested parties may purposefully act upon the information to which they have access by being able, to participate in decision- and policy-making fora. Voice is recognized as a means of ensuring integrity, accountability, and public interest at all stages of the policy process; procurement and otherwise (Cravero, 2019). It also is assumed to contribute to ensuring that decision-makers make more informed decisions reflecting a plurality of views and interests (Merisalo et al., 2024; OECD, 2022; Harrison et al., 2012). In addition to having access to high-quality information, delivering on voice-related aspects of transparency requires collaborative and responsive attitudes on the part of government. This is especially so in the procurement domain precisely because it involves substantial sums of public money and a high risk of integrity

³¹ See, <https://www.opengovpartnership.org/civil-society-engagement/>

³² Although procurement information visibility is strongly linked to integrity and anti-corruption efforts, the connection is not always established. The ability of civil society actors to successfully perform an oversight role, information availability must be coupled with timeliness, data quality, processing capacity, accurate reporting, and whistleblower channels. See, Transparency International (2022), Schnell (2020), Cravero (2019), and OECD (2016b).

failures.³³ As Transparency International (2019) puts it, competitiveness and fairness in procurement processes necessitate governments provide mechanisms that enable and enhance civic participation, public oversight, and accountability as well as the publishing of relevant information in a timely manner.

Paralleling the approach promoted by Transparency International, the Open Contracting Partnership offers a set of standards as a guideline for implementing participatory public procurement. These standards are meant to facilitate what it describes as effective monitoring, efficient performance, and accountability for outcomes:³⁴

- Governments shall recognize the right of the public to participate in the oversight of the formation, award, execution, performance, and completion of public contracts.
- Governments shall foster an enabling environment that recognizes, promotes, protects, and creates opportunities for public consultation and monitoring of public contracting, from the planning stage to the completion of contractual obligations.
- Governments shall work together with the private sector, donors, and civil society to build the capacities of all relevant stakeholders to understand, monitor and improve public contracting and to create sustainable funding mechanisms to support participatory public contracting.
- Governments have a duty to ensure oversight authorities, including parliaments, audit institutions, and implementing agencies, to access and utilize disclosed information, acknowledge and act upon citizen feedback, and encourage dialogue and consultations between contracting parties and civil society organizations in order to improve the quality of contracting outcomes.
- With regard to individual contracts of significant impact, contracting parties should craft strategies for citizen consultation and engagement in the management of the contract.

These recommended standards make clear that operationalizing best practices for augmenting the voices of interested parties in government procurement activities obliges governments to both

³³ In this context, integrity failures are defined as violations of ethical standards, rules, or legal norms that compromise the fairness, accountability, and transparency of procurement processes. These may include corruption, fraud, favoritism, conflicts of interest, or manipulation of procedures for private gain (Cravero & Farazmand, 2022; World Bank, 2020).

³⁴ The principles were developed in a collaborative process involving some 200 members of the international open contracting community from government, private sector, civil society, donor organizations, and international financial institutions. See, <https://www.open-contracting.org/what-is-open-contracting/global-principles/>

regularly inform and engage in meaningful consultation with citizens and other stakeholders.

From a research perspective, key challenges in assessing whether and how stakeholders' voices are doing more than simply speaking into the air involve ascertaining the meaningfulness of stakeholder participation in government procurement activities and identifying suitable indicators for assessing the effectiveness of such efforts. Using a deliberative democracy framework, that emphasized inclusive dialogue, fairness in participation, and the generation of informed collective decisions, Mannarini and Fedi (2018) evaluated the quality of citizen participation in local participatory policy-making processes in Italy through municipal participatory budgeting initiatives. Drawing on three citizen jury cases convened as part of these initiatives, they employed semi-structured interviews, post-jury questionnaires, and analysis of jurors' conversational turns to assess the deliberative process and the extent to which it fostered meaningful engagement with policy issues. They identified equity, cooperation, and cognitive openness³⁵ as key indicators of participation quality. Equity was used to assess the balance of participation among jurors—that is, the degree to which participants were afforded equal opportunities to contribute and influence discussions. Cooperation was measured in terms of interactions between jurors and facilitators as well as among jurors themselves, capturing the collaborative dimensions of decision-making. According to the authors, these indicators enabled a more comprehensive assessment of participation—extending beyond the mere presence of mechanisms or procedures to capture the substantive quality of engagement.

In the context of public procurement, Ferreira and Amaral (2016) adopted the public value framework to investigate how e-procurement systems generate economic, administrative, and

³⁵ The authors define cognitive openness as referring to participants' willingness to engage with, consider, and reflect upon viewpoints different from their own during the deliberative process.

democratic value for public organizations and society.³⁶ They focused on the benefits and challenges posed by implementing e-procurement systems and assessed the role of such platforms in improving public sector efficiency, transparency, and participation in Portugal. To do so, they used such indicators as changes in: levels of public access to tendering information (i.e., transparency); levels of supplier competition through open bidding (i.e., competition); administrative and transaction costs for both contracting authorities and suppliers (i.e., cost reduction); and processes of decision-making and procurement accuracy (i.e., efficiency gains). Based on their findings, they posited that, while participation is one potential feature of administrative activity and decision-making, it is not the ultimate aim of administrative action in and of itself. Instead, they view participation as instrumental to a broader aim of achieving meaningful government action that is reflective of, and responsive to, the inputs received. This framing is relevant in procurement contexts insofar as stakeholder input—whether from suppliers, oversight bodies, or civil society—is essential to improving the quality, legitimacy, and accountability of public decisions.

In seeking to provide a tangible example of what achieving meaningful government action that is reflective of, and responsive to, stakeholder input might look like in practice, Benmohamed et al. (2024) suggest looking at the actions of the government New South Wales, Australia. Specifically, they examine how the use of open government data (OGD) portals by public sector employees facilitated more informed decision-making processes and enabled iterative engagement with data shared by the public. They contend that government New South Wales' open government

³⁶ The public value framework, as originally articulated by Moore (1996), emphasizes the creation of value for the public through government actions that are effective, legitimate, and accountable. Over time, this framework was adapted to various contexts, including digital governance and public service delivery, to assess how government initiatives aligned with citizen interests and democratic principles. See, for example, Bryson et al., (2014) and Jørgensen and Bozeman (2007).

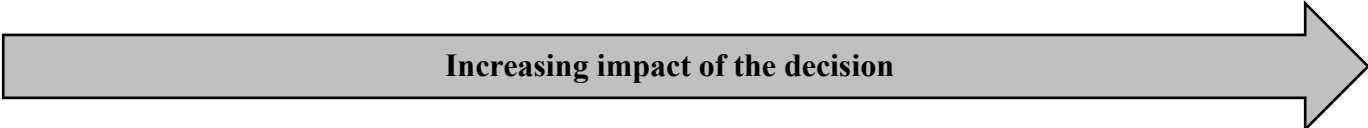
data portals successfully aligned government goals with citizen input, leading to more responsive government actions and the fostering of public value creation in the form of increased transparency, enhanced service responsiveness, and a reinforced sense of institutional legitimacy. According to these authors, when stakeholders derive benefit from government actions shaped, at least in part, by stakeholder-government collaboration, such initiatives can be seen as having achieved their intended goals.

This said, and as Cravero (2019) observes, it merits keeping in mind that the participatory component of government activities often varies depending upon circumstances. For example, in their examination of community participation in managing participative programs in Indonesia Hermawan and Hutagalung (2019), found that trust, motivation, and the capacity to engage directly affected the success of participatory initiatives. Their study involved using surveys and interviews to identify behavioral determinants of community members' participation in community programs . Their findings suggest 'voice' in governance—defined by stakeholders' ability and willingness to participate—was strongly conditioned by internal motivational factors and levels of trust in the process. More recently, in their review of the reasons for the failure of open government data initiatives in developing countries Alexopoulos et al., (2023) have shown how such initiatives are often hindered by economic constraints, insufficient technical capabilities, and a lack of political will, all of which can prevent citizens from effectively participating in the governance process.³⁷

Taken together, the picture that emerges about the voice aspects of transparency suggests that, even when governments seek to promote participation, the types of activities employed and

³⁷ It must be noted that these constraints are not in any way limited only to developing countries. A cursory review of the information available at the OGP Data Dashboard makes this abundantly clear. See, <https://www.opengovpartnership.org/data-dashboard/>

Figure 3.1 IAP2 Spectrum of Public Participation



	Inform	Consult	Involve	Collaborate	Empower
Public participation goal	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision, including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
Promise to the public	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

Source: Reproduced from, Federation of International Association for Public Participation (2024). IAP2 Spectrum of Public Participation. https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/iap2_spectrum_2024.pdf

their respective intensities often vary depending on the project, the stakeholders involved, and the nature of the policies or decisions under consideration. Adding to this complexity, participation can take place at different stages of government activities, such as policy design, implementation, or evaluation.

The International Association for Public Participation (IAP2)³⁸ has established a ‘Spectrum of Public Participation’ framework for evaluating levels of public participation based on the potential impact of the participation, the levels of public involvement, and the resulting types of public-government interaction (IAP2 Federation, 2020). This framework, which distinguishes between five levels of public participation (see Figure 3.1), and has been employed in various contexts as a guide for monitoring and evaluating community engagement and public participation in a variety of government activities and programs (Barry & Legacy, 2023; Cruz-Rubio, 2020; Graeme Stuart, 2017; Nelimarkka et al., 2014).

Until recently the IAP2’s framework was used by the OGP/IRM to assess the impact of public influence on the content of the national action plans (Paré, 2020; Karanicolas, 2018; Francoli, 2016).³⁹ The framework is based on seven core principles that the IAP2 sees as defining the expectations and aspirations of the public participation process. According to this framework, public participation:⁴⁰

- is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process;

³⁸ IAP2 is the preeminent international organization advancing public participation through professional development, certification, standards of practice, core values, advocacy, and key initiatives with strategic partners worldwide. See <https://www.iap2.org/page/about>

³⁹ In response to requests from member countries, one of the outcomes of the OGP/IRM’s 2018-2020 refresh exercise was a decision to stop reporting on where their open government activities were situated in relation to the IAP2 Spectrum of Public Participation scale. See, IRM Refresh, <https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/>

⁴⁰ See, IAP2 Federation(2020), https://cdn.ymaws.com/sites/iap2.siteym.com/resource/resmgr/files/IAP2_Federation_-_P2_Pillars.pdf

- includes the promise that the public's contribution will influence the decision.
- promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decision makers;
- seeks out and facilitates the involvement of those potentially affected by or interested in a decision;
- seeks input from participants in designing how they participate;
- provides participants with the information they need to participate in a meaningful way; and
- communicates to participants how their input affected the decision.

Cruz-rubio (2020), along with countless OGP/IRM country reports, suggest the IAP2 spectrum can be a useful analytical framework to employ when addressing questions of how, why, and to what extent public participation occurs in relation to public procurement and a host of other government activities wherein transparency in the form of voice is valued (or claimed).

Complimenting the IAP2 Spectrum of Public Participation, the OECD offers its Methodology for Assessing Procurement Systems (MAPS)⁴¹ as a tool for member countries to use in evaluating the strength and limitations of their procurement systems. MAPS rests on four pillars, each of which focuses on a specific facet of public procurement and offers qualitative indicators to assess the performance of the pillar in terms of voice (OECD, 2018). The four pillars are:

1. Legislative, Regulatory and Policy Framework: This pillar deals with the legal, regulatory, and policy framework a country has in place for public procurement. It defines “the formal rules and procedures governing public procurement” and compares them against international standards (OECD, 2018, p. 19). It directs attention at four indicators: (i) legal instruments, such as laws and decrees; (ii) administrative regulations; (iii) procurement-related provisions in other national laws (e.g., laws governing public private partnerships and concessions, trade and competition, access to information, anti-corruption, etc.); and (iv) obligations from

⁴¹ See, <https://www.mapsinitiative.org/methodology/>

international agreements, ensuring consistency and policy coherence across all levels.

2. Institutional Framework and Management Capacity: This pillar focuses on how a country’s procurement system, as defined by its legislative and regulatory framework, is implemented by “the institutions and management systems comprising the country's overall public sector governance” (OECD, 2018, p. 35). It consists of three indicators: (i) the existence of adequate links between a country’s procurement system and its the public finance management system; (ii) the presence of institutions responsible for necessary functions (e.g., providing advice to procuring entities, drafting procurement policies, monitoring public procurement, providing procurement information, managing statistical databases); (iii) the adequacy of existing managerial and technical capacities to support undertaking efficient and transparent public procurement processes.

3. Procurement Operations and Market Practices: This pillar centers on “the operational efficiency, transparency, and effectiveness of the procurement system at the level of the implementing agency in charge of managing individual procurement (i.e., procuring entity)” focusing “on how the procurement system in the country operates and performs in practice” (OECD, 2018, p. 47).⁴² It consists of two indicators: (i) public procurement practices, which examines procurement activities such as planning, selection, contracting, and contract management; and (ii) public procurement market, which assesses market characteristics, including competition, supplier access, and measures to promote transparency and fairness.

4. Accountability, Integrity and Transparency of the Public Procurement System: This pillar addresses critical parts “of the procurement system that engages stakeholders, including civil

⁴² The reader will recall that in terms of this dissertation, the two implementing agencies in question are PSPC, which manages the Buyandsell.gc.ca platform, and the TBS which oversees the [Proactive Disclosures – Contract Dataset](#) portal for contract data.

society, as part of the control system” focusing on the extent to which “the procurement system and governance environment ensure they are defined and structured to contribute to integrity and transparency” (OECD, 2018, p. 53). It consists of four indicators: (i) levels of transparency and civil society engagement in public contracting; (ii) the presence of effective⁴³ control and audit systems; (iii) effectiveness and efficiency of appeals mechanisms; and (iv) the presence of ethics and anti-corruption measures.

The fourth pillar of MAPS is particularly salient for the purposes of this dissertation because it directs attention at ‘ground level’ mechanisms that are recognized as prompting both private sector and civil society engagement and as constituting part of the control mechanism that contributes to integrity and transparency in public procurement systems. Table 3.1 presents two mechanisms for assessing the degree to which civil society is engaged in public procurement as set out by MAPS.

Table 3.1 OECD Mechanisms – Assessing Civil Society Engagement in Public Procurement.

Enabling environment for public consultation and monitoring	Direct engagement of civil society
<ul style="list-style-type: none"> ➤ Whether transparent and consultative processes are followed when making changes to the public procurement system. ➤ Whether effective channels for feedback, comments, inputs received from civil society are in place. 	<ul style="list-style-type: none"> ➤ Whether the legal/regulatory and policy framework enables civil society to be engaged in planning, bid opening, contract award, and contract completion. ➤ If there is sufficient evidence for the direct participation of citizens and civil society in procurement processes through consultation, observation, and monitoring.

The 2016 version of MAPS also defined an indicator for assessing private sector participation in the public procurement system that was comprised of two sub-indicators: (i) levels public-private sector collaboration; and (ii) accessibility to, and timeliness of, procurement information for the private sector (see, Table 3.2):

⁴³ As noted in the methodology document, “For the purposes of this indicator, “effectiveness” means the expediency and thoroughness of the implementation of auditor’s recommendations” (OECD, 2018, p. 54).

Table 3.2 The OECD Sub-indicators for Assessing Private Sector Participation

Dialogue and partnerships between the public and private sectors	Adequate and timely access to procurement information
<ul style="list-style-type: none"> ➤ The government has formal mechanisms for open dialogue and consultative process with the private sector when formulating changes to the public procurement system. ➤ Information and training on public procurement are offered to the private sector on a regular basis, either by the government or in collaboration with private organizations 	<ul style="list-style-type: none"> ➤ All stakeholders of government procurement have free access to adequate and timely information in each phase of the public procurement process as a precondition for effective participation.

Combined, the IAP2 Spectrum of Participation and MAPS provide tools for assessing stakeholder engagement within the context of Canada’s public procurement system. The former offers a framework of identifying and categorizing levels of public participation and its impact on procurement-related decision-making. In turn, MAPS functions as a tool for assessing how procurement systems operate in practice, including how institutional frameworks and operational procedures support or limit stakeholder involvement. Within the context of this dissertation, these tools offer a means by which to conceptualize and assess how the voice component of Meijer et al.'s (2012) framework is operationalized and the extent to which the GoC's actions in the procurement domain facilitate civil society and private sector participation.

3.2 Conclusion

Meijer et al.'s (2012) vision and voice framework offers a conceptual lens through which to examine transparency within the public procurement domain. However, these authors appear to conceptualize voice in an overly broad, singular manner that overlooks – or takes for granted – differences in the types of participation in which different actors might engage. In their framework, voice is defined primarily as “*open access to decision-making arenas,*” with the central question being “*whose voice is heard?*” and with attention directed to “*inequalities in access to participation meetings*” (Meijer et al., 2012, p. 15). However, Meijer et al. are silent on what

participation looks like in practice. Although this treatment highlights inclusivity, it does not differentiate among the varied forms of stakeholder participation. By contrast, the IAP2 Spectrum of Public Participation makes clear that stakeholder involvement can occur at multiple levels (e.g., inform, consult, collaborate), and the OECD's MAPS framework identifies distinct modalities (e.g., civil society oversight versus private sector transactional engagement). Taken together, these perspectives reinforce the view that voice is not a uniform construct but one that varies across stakeholder groups and contexts.

On this basis, I hypothesize that stakeholder engagement in public procurement activities may be better understood as a multi-dimensional phenomenon reflecting the distinct roles and interests of different stakeholders. Private sector actors, for instance, often engage in procurement processes through transactional activities, such as bid preparation, submission, and clarification requests. Civil society organizations, on the other hand, exhibit a range of practices, including basic access efforts (e.g., filing Access to Information requests), ongoing monitoring and oversight activities, and strategic policy advocacy aimed at influencing procurement system reform. These different priorities and patterns of engagement raise the prospect that voice in public procurement operates across several different modalities, each corresponding to the specific roles and practices of different stakeholders.

I also hypothesize that in the context of public procurement, the relationship between vision and voice does not follow a simple, linear pattern. Specifically, I contend that the interplay between vision (i.e., visibility) and voice (i.e., engagement) is likely to vary depending upon the stakeholder group in question and the motivations at play. While Meijer et al. (2012) identify the possibility of vision and voice sharing synergistic, complementary, or undermining relationships, it seems plausible that these dynamics manifest themselves in accord with the roles and interests of specific

stakeholders. For instance, greater visibility of procurement data can either reinforce or limit participation depending upon whether stakeholders are positioned to effectively leverage the information.

Together, these two hypotheses suggest that in spite of the incremental improvements made by the GoC in augmenting procurement-related transparency such challenges as delays in data publication and inadequate mechanisms for facilitating meaningful stakeholder engagement likely constrain the extent to which stakeholders are provided with both vision (i.e., access to visible and comprehensible information) and voice (i.e., opportunities for participation and input) in procurement processes. In the next chapter, my attention turns to the methodology employed to guide the first phase of the study and presents the findings obtained.

Chapter 4: Investigating Vision

The discussion in this chapter sets out the research design and methodology used in the desk-based phase of the project, along with the findings obtained. The chapter is divided into three sections. I begin by outlining the research design that guided the investigation into how transparency is operationalized within the GoC's public procurement activities, including the methodological choices and underlying rationale. I then detail the procedures used to assess the visibility-related attributes of procurement information across the federal government's *Buyandsell.gc.ca* and the *Proactive Disclosures – Contract Dataset* platforms, and presents the findings of this assessment. The aim is to examine the extent to which these platforms support the visibility dimension of transparency in procurement, particularly in terms of accessibility, usability, and the quality of the content provided. The chapter concludes with a brief reflection on the key insights and implications that emerged from the evaluation.

4.1 Research Design

In seeking to investigate how effectively transparency is operationalized within the GoC's public procurement activities, I adopted a multi-methods qualitative approach that involved dividing the project into two distinct, complementary phases: a desk-based platform analysis phase, and a key informant interview phase. Multi-methods qualitative research involves combining two or more qualitative methods to achieve a comprehensive understanding of a research problem (Flick, 2018; Lambert & Loiselle, 2008). This approach allows researchers to capitalize on the strengths of diverse qualitative techniques—such as depth, contextuality, and interpretive rigor—to investigate questions that require layered, nuanced analysis beyond what a single qualitative method can provide (Anguera et al., 2018; O'Reilly, 2015).

The first phase of my project involved the conducting of a desk-based analysis of the

federal government's *Buyandsell.gc.ca* and the *Proactive Disclosures – Contract Dataset* platforms, focusing on their vision-related attributes. The second phase involved conducting 13 semi-structured key informant interviews with individuals who were members of three distinct groups with a stake in public procurement in Canada: private sector actors, civil society actors, and government officials. The interviews aimed to capture stakeholder perspectives about the GoC's procurement practices.

The two-phase approach was well-suited to the objectives of this dissertation at two levels. First, it facilitated an iterative process wherein the findings from the initial desk-based analysis informed the design and focus of the questions asked in the subsequent interview phase. Second, it enabled the research to address both the technical and experiential dimensions of public procurement.

The desk-based analysis assessed the structural and functional aspects of the federal government's two main public procurement platforms, identifying gaps in accessibility, usability, and content quality. The insights garnered from the key informant interview phase of the study served to provide context to the desk-based findings, uncovering how stakeholders perceive and experience the gaps identified. For example, the observations emerging from the key informant interviews suggested that participants in my research sample viewed the technical barriers to platform usability—also identified during the desk-based phase—as symptomatic of broader issues with the inclusivity of government procurement processes. These barriers included difficulties with navigation, accessibility, English/French bilingual content, and information quality. Collectively, these barriers highlight the unequal burdens placed on smaller firms, civil society actors seeking to exercise oversight, and stakeholders who require accessible information in either English or French.

The value of multi-methods qualitative research in examining complex and policy-relevant questions has been acknowledged in several strands of public administration scholarship, particularly in studies concerned with institutional practices, stakeholder dynamics, and information systems. As noted by Bowen (2009), combining qualitative approaches such as document analysis and interviews allows researchers to engage both the formal structures and everyday experiences that shape public administration processes, including those involving transparency and accountability. Patton (2015) similarly highlights how multiple qualitative methods contribute to the credibility and depth of inquiry in applied policy research.

More recently, Harish et al., (2022) adopted a multi-method qualitative case study approach to analyze partnerships between Canadian public health authorities and technology companies during the COVID-19 pandemic. Combining document analysis with key informant interviews, they examined governance structures and transparency mechanisms within these collaborations exposing the complexities of ensuring accountability and public trust in digital health initiatives during emergencies. Hendren et al. (2023), who examined the role of interviews, document review, and case-based inquiry in public policy and administration research likewise outlined several ways in which qualitative methods contribute to producing context-sensitive credible insights, especially when addressing institutional complexity. Mansoor and Williams (2024) also point to the usefulness of multi-method qualitative frameworks in understanding public service delivery. Drawing on their study of inter-agency coordination in health governance, they describe how triangulating interviews, field observations, and policy documents enabled a more complete account of how governance structures, implementation processes, and stakeholder views interrelate.

The discussion in the next section offers an in-depth account of the design elements of the desk-based phase of my project. The research design elements pertaining to the key informant interviews are discussed in Chapter 5

4.2 Phase 1: Desk-based Analysis

Phase 1 of the project sought to evaluate the accessibility, usability, and quality of the procurement-related information available on Buyandsell.gc.ca and *Proactive Disclosures – Contract Dataset* in terms of how well these platforms aligned with visibility requirements for transparency and stakeholder engagement objectives specified by the conceptual framework informing this study.

Information visibility frequently is associated with how readily available information is to those who require it. In the online context, it is predominantly linked with websites and usually refers to promoting activity through to a website's ability to be found by target audiences who rely on search engine result pages. Put simply, 'website visibility' has long been a measure of likelihood that a user will come across a reference to any given website (Elsayed et al., 2024; Aul, 2018). Without visibility, a website is basically useless. It is equally important to note that visibility is not synonymous with discoverability. Whereas website visibility pertains to the fundamental idea that the more distinguishable a website is, the more likely interested parties will take notice of it, website discoverability is concerned with the detectability or discernability of new features of which users were previously unaware (Schilhan et al., 2021; Creager & Gillan 2016).

In the private sector, high visibility websites are regarded as valuable assets with the potential to contribute to enhanced brand awareness and increased sales and revenue. To this end, website visibility is a key consideration that usually is incorporated into a company's marketing strategy (Bytyqi et al., 2024; Hanisch et al., 2023; Wang & Vaughan, 2014). Visibility also is an important consideration for the public sector insofar as citizens and residents expect government

departments and agencies to be just as present and responsive to their online information needs as private sector entities; not least because government is the principal producer and collector of data, and this data, when made visible, can constitute a valuable economic and political resource.

Within the public procurement realm, visibility refers to the provision of free, real-time access to all procurement process information, including but not limited to: spending data, tender documents, evaluation criteria, contract awards (Richard, 2021; OECD, 2016c; Ystems et al., 2008). Such visibility is crucial to facilitating the ability of interested parties to actively monitor the tendering, issuing, and completion of government contracts. The idea here is twofold. First, by enhancing the visibility of its procurement platforms, government can reach, interact with, and receive feedback from a diverse range of stakeholders, facilitating the making of more informed decisions about public spending and resource allocations (Felizzola et al., 2024; OECD, 2018; 2016b). Second, the transparency accompanying this visibility, it is claimed, can also contribute to reducing corruption (World Bank, 2021; Lourenço et al., 2016; Schooner et al., 2011).

Both Csontos and Heckl (2021) and Venkatesh et. al., (2016) advance the need for considering two facets of websites when evaluating their effectiveness in facilitating user engagement and information accessibility. The first concerns website design. Here, emphasis is placed upon the visibility of the instrumental and technical features of individual websites (e.g., website architecture, search engine optimization (SEO),⁴⁴ navigation, and layout). These elements, as Setiawan et al. (2020), Schall (2014), and Killoran (2013) suggest, directly relate to the ease of finding and using a website which, in turn, affects its appeal for target users. The second facet pertains to the quality of the content available on websites. Of particular interest in this regard are

⁴⁴ Search engine optimization (SEO) refers to the process of designing or modifying website's content and structure to maximize its potential to rank high on search engines, thereby increasing its visibility. See, Setiawan et al., (2020); Aul (2018); and Killoran (2013).

usability—that is, the degree to which users can apply the information for their intended purposes—as well as such content quality attributes as information availability, accessibility, and findability. In sum, achieving high website visibility is largely contingent upon publishing content that satisfies the needs of both the target audience and search engines.

In 2019, the *Accessible Canada Act*⁴⁵ was enacted. It is aimed at making Canada barrier-free by January 1, 2040. Realizing this goal will involve identifying, removing, and preventing barriers that fall under the purview of the federal government in a range of priority areas including (Parliament of Canada, 2019):

- employment;
- the built environment (buildings and public spaces);
- information and communication technologies;
- communication, other than information and communication technologies;
- the procurement of goods, services and facilities;
- the design and delivery of programs and services; and
- transportation (airlines, as well as rail, road and marine transportation providers that cross provincial or international borders).⁴⁶

Particularly noteworthy for this dissertation are the requirements this legislation imposes upon organizations that are regulated under federal jurisdiction regarding the need to make their websites and web content compliant with accessibility standards/guidelines established or recognized by the Canadian Accessibility Standards Development Organization (CASDO)⁴⁷ (Doyle, 2021).

⁴⁵ See, <https://laws-lois.justice.gc.ca/eng/acts/a-0.6/>

⁴⁶ See, GoC (2025). About and Accessible Canada. (January 16). <https://www.canada.ca/en/employment-social-development/programs/accessible-canada.html>

⁴⁷ The Canadian Accessibility Standards Development Organization (CASDO) was established in August 2019 by the Accessible Canada Act, 2019. CASDO is mandated to develop accessibility standards for federal jurisdiction in collaboration with industry and the disability community. It is led by a Board of Directors comprised of a majority of people with disabilities. See, <https://accessible.canada.ca/news/government-canada-announces-appointments-canadian-accessibility-standards-development>

At this point in the discussion, it is important to clarify that despite being interrelated concepts, visibility and accessibility are not synonymous. Visibility refers to the extent to which information is made available interested parties (Acosta-Vargas et al., 2020; Berkelaar et al., 2017; Stohl et al., 2016). It is concerned with whether the necessary data and details are disclosed publicly and presented in an understandable format. Accessibility, on the other hand, pertains to the ease with which stakeholders can locate, access, and make purposeful use of the visible information. Accessibility is influenced by factors such as platform usability, language barriers, and technological inclusivity (Berg et al., 2023; Berkelaar et al., 2017).

Accessibility is a quality that determines whether a website enables equal access to information for all users, including those with disabilities. According to Paul and Das (2020), accessibility measures how distinctively capable users can access, understand, engage with, and navigate a given website or platform. This quality is determined by a variety of factors including such things as page layout, colour choice, and readability. Berkelaar et al. (2017) provide three criteria for assessing accessibility. In their view, information at a website is deemed accessible if:

- Potential users know it exists and where to locate it;
- It is catalogued or organized in some way; and
- People have the technical and cognitive abilities necessary to acquire and interpret the information.

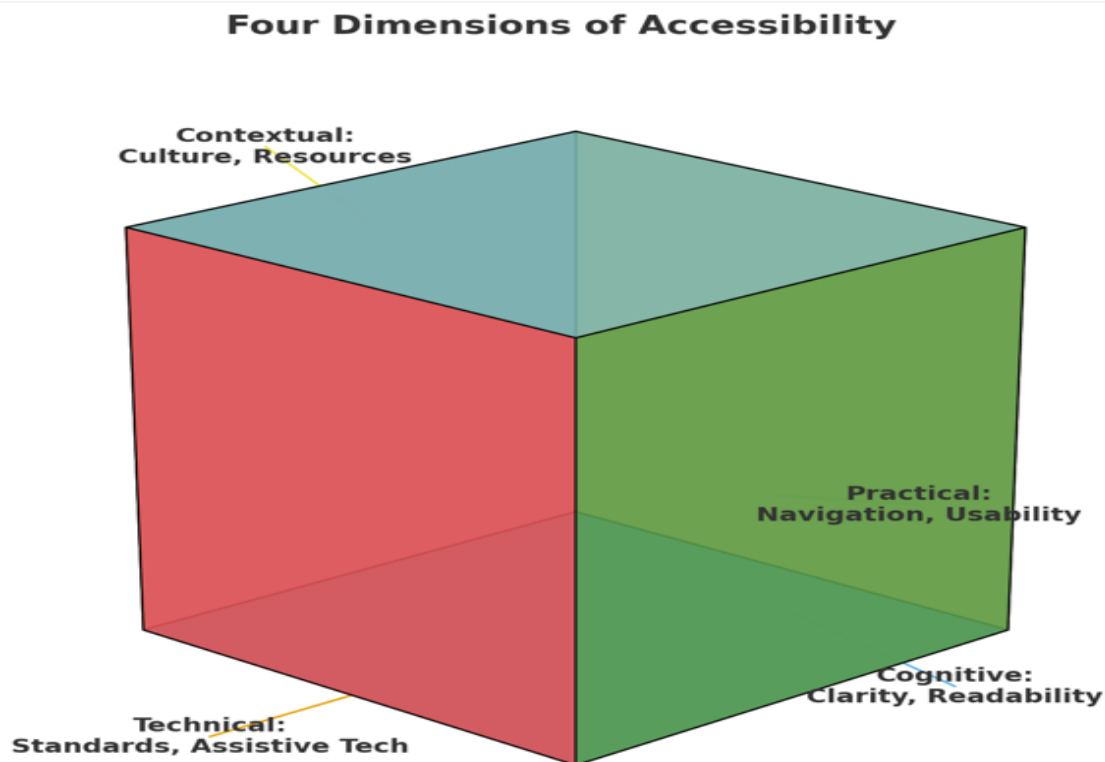
To provide greater conceptual clarity, these criteria can be further elaborated through four interrelated dimensions of accessibility:

- ***The Technical Dimension*** refers to compliance with formal accessibility standards such as the Web Content Accessibility Guidelines (WCAG) and the compatibility of a platform with assistive technologies used by people with disabilities (World Wide Web Consortium, 2018).
- ***The Cognitive Dimension*** concerns the understandability of procurement information, including the complexity of language, clarity of instructions, and overall readability, which

is particularly critical for stakeholders with cognitive disabilities (Gartland et al., 2022; Kärpänen, 2024).

- **The Practical Dimension** captures the ease with which users can find, navigate, and apply information in practice, encompassing elements such as metadata, search functionality, and interface usability; the ability to locate relevant information efficiently is central to meaningful engagement with digital platforms (Pal et al., 2023).
- **The Contextual Dimension** reflects the influence of user capabilities and surrounding circumstances, such as linguistic diversity, cultural expectations, or resource constraints, which can shape whether procurement information is genuinely accessible to different stakeholder groups (Kärpänen, 2024).

Figure 4.1 Four Dimensions of Accessibility



These dimensions, while analytically distinct, are closely interrelated and together determine the extent to which stakeholders can perceive, interpret, and make meaningful use of government procurement information.

Another related parameter to consider when investigating the visibility aspect of transparency is the effort required to access the information at the website in question when compared to accessing the same information from other sources (Stohl et al., 2016).

Building on this notion, the desk-based phase of this project involved me assessing the accessibility of the *Buyandsell.gc.ca* and the *Proactive Disclosures – Contract Dataset* platforms using a Website Accessibility Checklist that was based on the Web Content Accessibility Guidelines (WCAG). Published by the World Wide Web Consortium (W3C)'s Web Accessibility Initiative (WAI),⁴⁸ these guidelines provide recommendations for making Web content more accessible and outline ways for testing the accessibility, particularly for people with disabilities, of online platforms.⁴⁹ WCAG has been formally integrated into Government of Canada standards since 2008, making it directly relevant for assessing the accessibility of *Buyandsell.gc.ca* and the *Proactive Disclosures – Contract Dataset*. It is also widely used in academic analyses of e-government accessibility (e.g., Al-Khalifa et al., 2017; Akgül & Vatansever, 2016; Paul & Das, 2020). The guidelines are premised on four principles – Perceivable, Operable, Understandable, and Robust – that are commonly referred to by the acronym POUR (Bureau of Internet Accessibility, 2021; Malik et al., 2017).

⁴⁸ The W3C is an international community that develops Web standards that introduced the WAI as a consensus-based process involving various stakeholders in web accessibility, including industry, disability organisations, government, and accessibility researchers. See, <https://www.w3.org/WAI/about/>

⁴⁹ See, Bureau of Internet Accessibility (2019). History of the Web Content Accessibility Guidelines (WCAG). (May 6). www.boia.org/blog/history-of-the-web-content-accessibility-guidelines-wcag.

Principle 1: Perceivable. This principle focuses on ensuring all information on compliant websites, including user interface components, text, multimedia, and audio, is presented in ways that all users can understand. The onus here focuses on the extent to which online content is perceivable through different senses – e.g., sight, hearing, and touch – to users. According to the Bureau of Internet Accessibility (2019),⁵⁰ the parameters for this principle include, but are not limited to:

- The website must provide text alternatives for any non-text material so that it can be converted to the formats that users need, such as large print, braille, audio, symbols, or simpler language.
- The website must provide alternatives for time-based media.⁵¹
- The content must be adaptable to be presented in a variety of ways (e.g., simpler layout) without losing information or structure.
- The material must be distinguishable, making it easier for users to see and hear content, including separating foreground from background, e.g., colour should not be the only means to convey information.

In Canada, web accessibility standards have been applied to federal government websites and Web apps since 2000 (Government of Canada, n.d.). As of December 31, 2002, all government departments were to be compliant with the Common Look and Feel (CLF) 1.0 standards (including WCAG 1.0).⁵² In December 2008, Canada adopted WCAG 2.0.⁵³ Roughly one year later, in January 2010, then Secretary of the Treasury Board, Vic Toews, announced existing CLF standards would be replaced by three new standards: the Standard on Web Accessibility, the Standard on Web Usability, and the Standard on Web Interoperability (Treasury Board of

⁵⁰ The Bureau of Internet Accessibility (BoIA) is a US-based organization established in 2001 to promote web accessibility for individuals with disabilities, including visual, auditory, and cognitive impairments. It offers tools, audits, training, and support services to help organizations in industries such as education, healthcare, and government address accessibility issues and ensure compliance with web accessibility standards. See <https://www.boia.org/about>

⁵¹ Time-based media encompasses a wide range of media formats such as video, audio, power point slides, computer simulations, and any other media that have duration as a property.

⁵² See, Web Content Accessibility Guidelines 1.0. <https://www.w3.org/TR/WAI-WEBCONTENT/>

⁵³ See, Web Content Accessibility Guidelines (WCAG) 2.0. <https://www.w3.org/TR/WCAG20/>

Canada Secretariat, 2013). In applying these standards, the government committed to moving forward with implementing WCAG 2.0. and maintaining a high level of web accessibility across all its websites and Web applications.

Throughout the 20-teens, the federal government took several additional steps to strengthen digital accessibility. The Standard on Web Accessibility came into effect in 2011, requiring departments to meet WCAG 2.0 Level AA compliance by 2013 (Treasury Board of Canada Secretariat, 2011). These efforts were further reinforced through the 2019 *Accessible Canada Act*, which introduced a legal framework for proactively identifying, removing, and preventing barriers to accessibility, including in digital spaces, across all federally regulated sectors (Parliament of Canada, 2019).

At the time of writing, the GoC is updating its digital accessibility standards to align with CAN/ASC-EN 301 549:2024,⁵⁴ which incorporates WCAG 2.1 Level AA guidelines. Proposed amendments to the Accessible Canada Regulations indicate that federally regulated entities—including federal departments, Crown corporations, and industries such as banking and telecommunications—must ensure all new and significantly updated web content is accessible by June 1, 2027, with accessibility statements for websites, mobile apps, and essential digital documents published by the same deadline (Government of Canada, 2024d).

Principle 2: Operable. Operability refers to the various ways in which one can use a website. As such, this principle is oriented toward addressing the needs of those with mobility issues, weak muscles, or wounded limbs. According to this principle, user interface elements and navigation “cannot require interaction that a user cannot perform.” The W3C’s Web Accessibility Initiative

⁵⁴ CAN/ASC-EN 301 549:2024 is the Canadian national adoption of the European standard EN 301 549. It specifies accessibility requirements for information and communication technology (ICT) products and services, particularly in the context of public procurement. See: <https://accessible.canada.ca/sites/default/files/2024-06/can-asc-en301549-20240226-v02-en-aoda.pdf>

recommends adherence to the following guidelines to ensure a website is operable (World Wide Web Consortium (W3C), 2024):

- All the website’s functions and features are accessible via a keyboard.
- There is enough time for users to read and use the content.
- Avoid creating material that might cause seizures or physical reactions – e.g., the content that flashes, blinks, or stripes more than three times in any one second
- Provide options for people to navigate, locate content, and determine where they are on the website. Here are examples of the requirements to meet this guideline:
- Web pages have titles that describe the topic or purpose.
- The purpose of each link can be determined from the link text alone.
- Links to help users determine their location on the website
- Users can easily operate any functionality using a variety of inputs other than the keyboard. This may include specialized or adapted input devices such as a head pointer, eye-gaze system, or speech-controlled mouse emulator.

Principle 3: Understandable. The Web Accessibility Initiative (WAI) (2022) defines the ‘understandable website’ as one that is easy for all users to follow because it does not use a lot of technical terms or sophisticated language, does not have complicated instructions that are difficult to follow, and has consistent non-confusing guidance (World Wide Web Consortium (W3C), 2024). Based on this description, initiative advances three recommendations to website developers for establishing an understandable website:

- Readability: Make text content readable and intelligible
- Predictability: Make sure that Web pages appear and function in a predictable manner.
- Input Assistance: Help users avoid and correct errors.

Principle 4: Robust. Robustness refers to web content that is compatible with a wide range of user agents such as browsers, assistive technologies, and other methods of accessing web content. Here, the emphasis is placed upon making website content sufficiently reliable so as to be interpreted by different technological tools. An example of this principle’s guidelines is compatibility with assistive devices used by people with disabilities to browse the internet. According to the WCAG guidelines, this requirement reflects the website’s compatibility with

current and future user agents, including assistive technologies, and thus maximizes its overall accessibility.

The four POUR principles are widely used in the context of e-government to assess the accessibility of government websites. For example, Al-Khalifa (2010) and Al-Khalifa et al. (2017) applied WCAG standards to evaluate the accessibility of 36 e-government websites in Saudi Arabia in 2010 and again in 2016. Their objective was to assess whether and how the accessibility of Saudi government websites had changed during the intervening six years. In 2010, using manual evaluation, Al-Khalifa, (2010) found that Saudi government websites failed to meet even the minimum level of accessibility conformance, hindering disabled people from benefiting from the services provided at government websites. According to their findings, a lack of awareness among government administrators regarding the importance of web accessibility was a leading factor contributing to this shortcoming. Using website evaluations and comparative analysis six years later to re-evaluate the same sample, Al-Khalifa et al. (2017) identified a marked improvement in the accessibility of Saudi government websites, which they attributed to the increase in awareness of accessibility standards within e-government programs in the country.

Relying on a methodology based on WCAG 2.0 standards, Akgül and Vatansever (2016) evaluated the accessibility of 30 municipal websites in Turkey. They noted relatively low levels of accessibility across the sampled websites, with most failing to adhere to the WCAG 2.0 guidelines. Specifically, they identified two main issues that mostly affected people with visual disabilities: (i) a lack of alternative text for non-text content; and (ii) exclusive reliance on tags instead of Cascading Style Sheets⁵⁵ to create visual presentations.

⁵⁵ Cascading Style Sheets (CSS) is a computer language used to structure and define styles for web pages, including the design, layout and variations in display for different devices and screen sizes.

Applying two automated evaluation tools developed in accord with WCAG 2.0 guidelines, Nakatumba-Nabende et al. (2019) examined the extent to which the websites of 63 Ugandan government ministries, departments, and agencies satisfied WCAG 2.0 requirements. They found that none of the sampled websites met the WCAG level AA standards.⁵⁶ Paul and Das (2020) likewise applied automated evaluation tools to investigate the accessibility of some 65 e-government websites in India. They, too, found substantial accessibility issues resulting in ineffective service delivery, poor adoption, and limited user engagement. Particularly noteworthy was their observation that accessibility and usability considerations were given only limited attention during the design and development phases of the Indian government's websites.

To date, methodologies to evaluate web accessibility have tended to predominantly rely upon the use of automated tools, human participants, or a combination of the two to assess the extent to which web content complies with accessibility guidelines (see, for example, Csontos & Heckl, 2021; Máchová et al., 2018; Acosta-Vargas et al., 2017; Al-Khalifa et al., 2017). Although such tools are widely used to facilitate the speed and ease with which testing occurs, the W3C

⁵⁶ AA is the second of WCAG 2.0's three conformance levels. (A is the minimal, AA is acceptable, and AAA is optimal). Websites that meet level AA requirements are regarded as reasonably accessible to the majority of users, with or without disabilities. See, Bureau of Internet Accessibility (2021). See also <https://www.boia.org/blog/whats-the-difference-between-wcag-level-a-level-aa-and-level-aaa>

Table 4.1 Modified WCAG-based Accessibility Check-list

Principle	Evaluation criteria	<i>Buyandsell.gc.ca</i> (Yes / No)	<i>Proactive Disclosures – Contract Dataset</i> (Yes / No)
Perceivable	Text Alternatives (e.g., large print, braille, speech)		
	Alternative for time-based Media		
	Adaptable Content		
	Distinguishable		
Operable	All functionality of the content is operable through a keyboard		
	Timing is not an essential part of the event or activity presented by the content		
	No flashes, blinks, stripes		
	Navigable: <ul style="list-style-type: none"> ➤ Each page has descriptive title indicating its content in title tag ➤ link purpose ➤ location map ➤ breadcrumb trail 		
	Content can be controlled with pointing device other than keyboard (i.e., Input Modalities)		
Understandable	Readable: <ul style="list-style-type: none"> ➤ Text content is readable by user and assistive technologies ➤ Default human language of each page can be programmatically determined 		
	Predictable website features		
	Input assistance: Assistance available when users make mistakes		
	Input assistance: Labels/instructions provided when content requires user input		
	Input assistance: When requiring user to submit information, at least one of the following is true: <ul style="list-style-type: none"> ➤ Reversible: Submissions are reversible ➤ Checked: User-entered data checked for input errors, and opportunity to correct is provided ➤ Confirmed: Mechanism available for reviewing, confirming, and correcting information before finalizing submission 		
Robust	Is the code correct and valid?		
	Does the web page use semantic elements when appropriate? ⁵⁷		

⁵⁷ Semantic elements refer to such tools as: tables, forms, articles, and sections used to clearly describe the meaning of the content to both users and SEOs

Table 4.2 Accessibility Testing Software Tools

Tool	Description
Web Accessibility Test (TAW) https://www.tawdis.net/	<ul style="list-style-type: none"> ➤ Provides consultation, certification, training, and development of accessible web content for people with disabilities ➤ Generates a report that can be viewed online or sent via email ➤ Provides an overview based on accessibility guidelines - divided into perceivable, operable, understandable, and robust ➤ Interface available in English, Castellano, and Portuguese. ➤ Disadvantage: generated report contains codes that cannot be evaluated automatically and must be assessed by an expert (Padure & Pribeanu, 2020).
Web Accessibility Evaluation Tool (WAVE) https://wave.webaim.org/accessibility	<ul style="list-style-type: none"> ➤ Online web service that detects accessibility and Web Content Accessibility Guidelines (WCAG) errors ➤ Developed at Temple University's Institute on Disabilities and later taken over by WebAIM (Web Accessibility in Mind) at the Center for Persons with Disabilities (CPD, Utah State University). ➤ Free when used for personal, non-commercial purposes. ➤ Disadvantage: tool provided "as is," and cannot determine or inform if a web content is accessible – only human intervention can determine the accessibility of a web content (Johnson P; Lilley M, 2022; Agüero-Flores et al., 2019; Petrie et al., 2007).
Web Accessibility Checker (AChecker) https://achecker.achecks.ca/checker/index.php	<ul style="list-style-type: none"> ➤ Online tool for detecting online accessibility issues that users with vision, hearing, physical, speech, and cognitive impairments, may encounter. ➤ Can be used by entering the URL or HTML of the web page into the AChecker form ➤ Allows user to choose between WCAG 1.0 and WCAG 2.0 accessibility guidelines, conformance levels A, AA, and AAA, and report format. ➤ Generated report categorizes detected problems into ‘known’ issues identified with certainty as accessibility barriers, ‘likely’ issues recognized as probable barriers to accessibility, and ‘potential’ accessibility concerns that AChecker cannot identify on its own (Nakatumba-Nabende et al., 2019).

cautions⁵⁸ against overreliance on software programmes or online services in determining the accessibility of websites, noting that the need for human evaluation expertise abides. Bearing these considerations in mind, the analysis of the accessibility of the *Buyandsell.gc.ca* and the *Proactive Disclosures – Contract Dataset* platforms presented below employed a combination of end-user evaluation and automated tool testing.

To assess the accessibility of elements of the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms I developed a somewhat modified version of the WCAG checklist. This assessment serves to indicate potential accessibility issues from the perspective of a non-expert user, allowing me to identify barriers that could affect stakeholders’ ability to engage with procurement information, thereby indicating potential accessibility and visibility challenges that the semi-structured interviews in Phase 2 with key informants further examine. The accessibility component of the checklist is presented in Table 4.1. I also assessed the accessibility of these two platforms using accessibility testing software tools. Before doing so, however, I tested three of the most commonly referenced accessibility testing software tools to determine which would be best suited to the purpose and scope of my dissertation. Short descriptions of the three tools I examined are provided below in Table 4.2. Of the three tools listed in Table 4.2, I deemed Achecker to be the most appropriate for my needs, not least because it supports multiple WCAG versions, categorizes issues according to my checklist, and enables consistent, comparable evaluation of both platforms—features that the other tools do not provide. It is also a free tool and easier to use than its counterparts.

The W3C recommends that when designing and developing websites and applications, accessibility and usability should be addressed as two complementary technical features of website

⁵⁸ See, W3C, Evaluating Web Accessibility Overview. <https://www.w3.org/WAI/test-evaluate/>

visibility because these two qualities are highly complementary. Recently, some e-government researchers have begun to include website usability as a technical visibility feature that goes hand-in-hand with accessibility (see, for example, Akgül, 2021; Csontos & Heckl, 2021; Paul & Das, 2020; Karaim & Inal, 2019). Usability is an aspect of website visibility that refers to how easy user interfaces are to use (Parlakkiliç, 2022; Rinder, 2012; Herring, 2012). It is an attribute that pertains to a user's satisfaction with a user-operated product, whether it is a website, a software application, or some other mobile technology (Adshayan & Jayatissa, 2025; Muhammad et al., 2021; Huang & Benyoucef, 2014; Mohd Isa, 2011; Rukshan & Baravalle, 2010). Writing more than a decade ago, Belanche et al. (2012), Liliana and Villota (2010), and Flavián et al. (2006) linked usability to the following factors:

- The ease of understanding a website's structure, functions, interface, and content.
- The simplicity of use of the website in its initial stages.
- The speed with which the users can find what they are looking for.
- The perceived ease of website navigation in terms of time required and action necessary to obtain the desired results.
- The users' ability to control what they are doing on a website and where they are at any given moment.

More recently, Rasmus et al. (2020) and Roy and Pattnaik (2014), described usability as pertaining to five qualities:

- Learnability, or the ease with which a new user may complete tasks on a website for the first time.
- Memorability which pertains to how easy it is for someone to return to a website after not using it for a period of time.
- Efficiency which refers to how quickly users can complete tasks on a website after becoming familiar with it.
- Satisfaction which relates to whether or not a user is satisfied with the website design.
- Errors or the number of mistakes made by a user when they use the website, as well as the seriousness of the errors and the ease with which they can be rectified.

The factors listed above illustrate the complementarity between usability and ease of use, and how

both concepts revolve around the website design and functionalities. In line with this view, Máchová et al. (2018) and Attard et al. (2015) assert that a website's usability is determined by how simple it is to find, discover, and reuse its available content or features. With this in mind, they suggest two additional parameters that can be added to considerations of usability: findability and discoverability. According to these authors, each of the latter are sub-components of usability because they both constitute user experience metrics directly relating to locating information and features required for task completion.

Despite their similarity, a distinction can be drawn between findability and discoverability. The former refers to how easily users can locate content or functionality they know exists, whereas the latter refers to how readily users can come across features or information of which they were previously unaware (Creager & Gillan, 2016). In the context of software applications and websites, high levels of findability and discoverability require the presence of both well-defined information architecture⁵⁹ and a well-designed navigation system. The former and the latter can be used as findability and discoverability indicators when evaluating usability insofar as usability-related issues frequently arise from a poorly designed navigation system, typically due to the organization, placement, visual design, or terminology used (Guizani, 2022; Jarvis et al., 2022; Aqle et al., 2020; Schall, 2014).

Shneiderman and Plaisant (2010) advocated for evaluating website usability through regular user experience, urging that it become standard practice precisely because it provides firsthand information about users' interactions with a website, and helps detect shortcomings with the user interfaces. Lourenço (2015) likewise asserted that, for a website to be considered usable,

⁵⁹ Information architecture refers to the structural design of shared information environments; the art and science of organizing and labeling websites, intranets, online communities, and software to support usability and findability (McInerney & Day, 2002).

it must be designed in such a way that even ordinary people with no specialized technical skills can easily find, discover, and use its functionalities. As such, he urged website developers and designers to consider ordinary users' perspectives and demands throughout the design stage. Echoing this view, Akgül (2021) proposes a checklist of user experience centred requirements that is comprised of the five elements:

1. Overall design standards (e.g., splash pages, autoplay, and horizontal scrolling).
2. Convention for hyperlinked text in the main text (whether text links have underlined link features).
3. Navigational ease, which can be assessed as to whether the “home” or “return” text link adopted good navigational standards (each navigational group should have no more than ten items).
4. Findability of the website (whether it can be viewed on the first page of Google search results).
5. Readability. It can be evaluated as to whether the text is left-justified and whether the page can be viewed in more than one language.

Akgül (2021) applied the above checklist to evaluate the usability of 110 Turkish state and 69 private university websites. His findings indicated a low level of usability among his research sample, with only ten state and four private university websites possessing a reasonable level of usability.

Drawing from Akgül (2021)'s checklist, I opted to assess usability by employing a mixed approach that combined my conducting both an ordinary user experience assessment and running a test using an automated tool to evaluate the friendliness of the user interfaces of [Buyandsell.gc.ca](https://www.buyandsell.gc.ca) and *Proactive Disclosures – Contract Dataset* (see Table 4.3).

Table 4.3 Usability Check-list

	Evaluation criteria	<i>Buyandsell.gc.ca</i> (Yes / No)	<i>Proactive Disclosures – Contract Dataset</i> (Yes / No)
Overall design	Splash pages, auto play, and horizontal scrolling		
Hyperlinked text	The text links have underlined link features		
Navigational ease	No more than ten items in each navigational group		
Findability	Is the website displayed on the first page of Google search results?		
Readability	Is the text is left-justified? Is the website bilingual?		

Several automated tools are available to test how mobile-friendly websites are. Google Mobile Friendly was one such free, and commonly used, tool.⁶⁰ I was drawn to it as a tool for testing usability because it was free and very simple for non-experts to use. Indeed, one simply needed to enter into the tool the URL of the webpage they wish to evaluate, run the test, and wait approximately one minute for the results to display.

The third facet of website visibility is the quality of the information or content. There are myriad definitions of what comprises quality of content. Hasan and Abuelrub (2011) posited there are common characteristics constituting high-quality information no matter the topic, industry, or target audience. In their view, high-quality website content refers to information that is:

- **Timely:** this quality concerns the currency of website information and includes such elements as how up to date the information is, how regularly website content is updated, and whether it is clear when the site was updated.
- **Relevant:** this quality refers to the extent to which a website’s information is comprehensive, complete, and provides the appropriate level of detail, as well as being informative and valuable to its users.
- **Multilanguage / culture:** The website’s information is available in a variety of languages that are suitable for, and meet the needs of, all potential users regardless of their culture. This indicator is relevant to visibility because offering content to users in different languages can optimize the search engine results for the website.

⁶⁰ This tool was retired in late 2023 and is no longer available. See, Google Search Central. The Search Console mobile friendly testing tool (retired). <https://developers.google.com/search/blog/2016/05/a-new-mobile-friendly-testing-tool>

Within the Canadian context, the Official Languages Act requires that all websites administered by federal government agencies create their content in both English and French, and that updates to these websites must be made simultaneously in both languages.⁶¹

- Variety of presentation refers to whether information is presented in different forms text, video, audio etc., so the user can download it in the form that suits them.
- Accuracy: refers to how precise the information is including the absence of spelling and grammatical errors, and whether the sources of information are identified.
- Objective: refers to the extent to which information is presented without political, cultural, religious, and/or institutional biases.
- Authority: refers to the credibility or level of user confidence in the information on websites, which is easily indicated, for example, by presenting information about the organization's physical address.

Dong and Ji (2018), Wirtz et al. (2016), Venkatesh et al. (2016), Mäntysalo (2015), Harrison et al. (2012), Saha et al. (2012), all advocated for expanding the above list to include consideration of information characteristics such as preciseness and sufficiency, accuracy and completeness, comprehensiveness and usefulness. Echoing this view, Attard et al. (2015) equate information quality with its perceived fitness for use,⁶² and Thielsch and Hirschfeld (2021) suggest it may be thought of as referring to users' perceptions of, and satisfaction with, available website content. Lastly, Sukhraj (2022) and Larry Kim (2018) have defined quality of information in relation to how well the content ranks in search results, generates online traffic, and engages users.

In the context of government procurement, open contracting often encounters a number of problems linked to the quality of information, including:

- limited information about contracting;
- contracting information published but only about one stage of the contracting process;
- difficulties joining up information from different stages of the contracting process;
- difficulties interpreting published information/data; and
- mismatches between the information government publishes and the information users need.

⁶¹ See, <https://laws-lois.justice.gc.ca/eng/acts/o-3.01/>

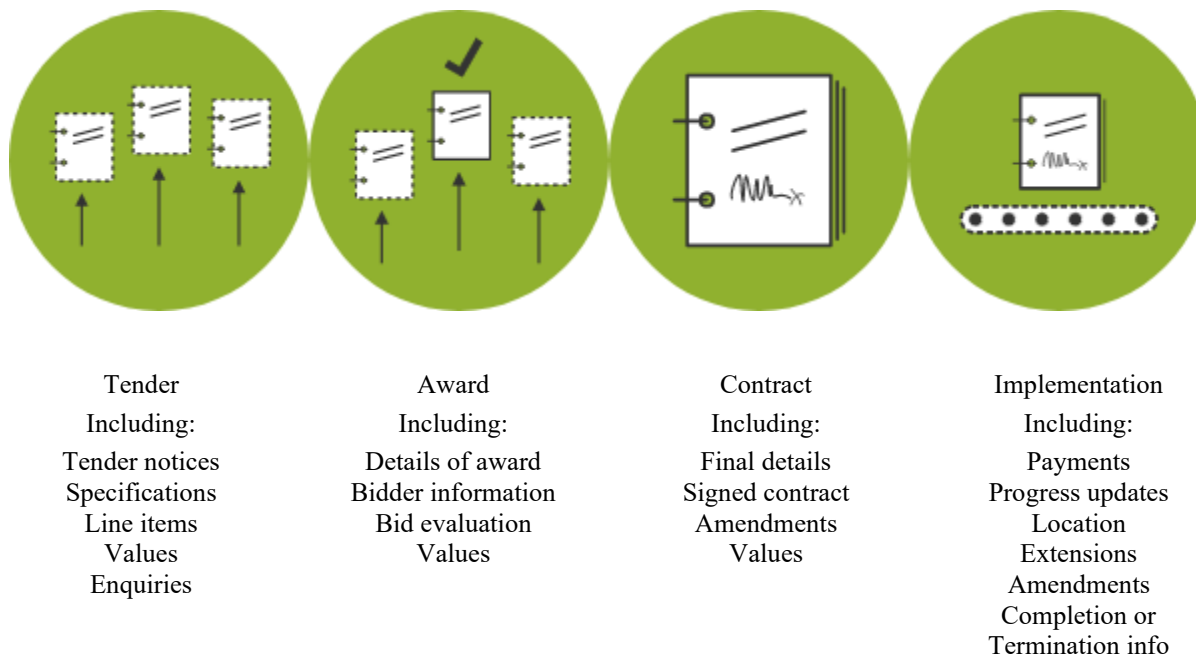
⁶² An important limitation with this notion is that 'fitness for use' is a multi-dimensional term that can be linked both to differing perceptions reflecting the needs and experiences of users, and to differing metrics of evaluation.

To address such issues, the Open Contracting Partnership has developed the Open Contracting Data Standard (OCDS), a non-proprietary open data standard for public contracting that advances information visibility at all stages of the procurement process: planning, tender, award, contract, and implementation.⁶³ At the time of submitting this dissertation for evaluation (June 2025), the OCDS has reportedly been adopted by some 50 municipal, regional, and national governments worldwide including, Argentina, Australia, Canada, Italy, Ghana, Uruguay.⁶⁴ Indeed, the OCDS sets a benchmark for publishing procurement information, identifying the types of information that should be released at each stage of the procurement cycle (see Figure 4.1).

⁶³ See, <https://www.open-contracting.org/data-standard/>

⁶⁴ See, <https://www.open-contracting.org/worldwide/#/table>. See, also: <https://www.open-contracting.org/worldwide/#/>

Figure 4.2: The contracting process



Source: How does OCDS work? <https://standard.open-contracting.org/latest/en/primer/how/>

According to the GoC, by launching the OCDS on Buyandsell.gc.ca, the platform successfully coordinated single-window access to a wide range of open contracting information from across federal departments (Treasury Board of Canada Secretariat, 2014). This initiative, it was claimed, was complemented by the launching, in 2015, of the *Proactive Disclosures – Contract Dataset* platform which makes available to the public via a centralized, machine-readable database information about all federal government contracts worth more than \$10,000.

In line with the Open Contracting Partnership’s OCDS, the OECD has established criteria for its member countries to assess whether the content of their public procurement platforms promotes information visibility, allowing external parties such as the media and civil society to scrutinize and oversee public contracts. The recommended criteria include a list of the types, and areas, of procurement information that member governments are required to publish on their procurement platforms (OECD, 2016c, p. 16; 2018):

- Area(s) where public contracting will take place.
- The criteria for adjudication of public contracts.
- contract templates.
- The monitoring processes.
- The applicable timelines.
- The tendering documents.
- The list of prequalified contractors (including information from interested parties).
- requests for clarification; and
- Possible amendments to the tendering procedure.

Together, the Open Contracting Partnership and OECD standards and recommendations emphasize that a visible procurement process with high-quality content necessitates the presence of specific types of information that vary in accord with different stages of the procurement cycle.

Table 4.4 Quality of Information Checklist

	<i>Buyandsell.gc.ca</i> (Yes / No)	<i>Proactive Disclosures – Contract Dataset</i> (Yes / No)
Tender notice		
Contract specifications		
The contract location		
Procurement entity		
The original contract value		
The criteria for adjudication of contracts		
Award notice		
Bidder information		
Awarded contractor name		
Awarded contractor address		
The contract timeline		
The contract template		
Amendments value		
Amendments date		
Progress update(s)		
The list of prequalified contractors		
Contract history		
Requests for clarification		
The monitoring procedures		

To assess the quality of the content on the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms, I created a checklist of 19 items I derived from Open Contracting Partnership standards and OECD recommendations (see Table 4.4).

The preceding discussion proposed a working framework for assessing the visibility of government procurement platforms, organized around three interrelated dimensions: accessibility, usability, and content quality. Grounded in broader theoretical understandings of visibility and digital government practices, these dimensions were identified as analytically relevant for examining how technical features, navigational design, and informational clarity shape stakeholders' capacity to locate, interpret, and make use of procurement data. Informed by established resources—including the Web Content Accessibility Guidelines (WCAG), user experience principles, and Open Contracting Data Standards (OCDS)—this framework was intended to support a visibility-centered desk-based analysis of the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms.

4.3 Visibility Findings

The discussion in this section presents the procedures followed and the findings that emerged from my evaluating of the visibility of procurement information on the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms. In late May 2025, a few weeks prior to the submission of my dissertation, I attempted to revisit *Buyandsell.gc.ca* and its counterpart, the *Proactive Disclosures – Contract Dataset*, to verify the currency of findings reported below regarding information accessibility, usability, and content quality. The content formerly hosted on *Buyandsell.gc.ca* had by then been fully migrated to the new *Canadabuys.canada.ca* platform. In seeking to explore the new platform, I encountered registration requirements and access restrictions that limit unregistered users' ability to navigate the site. Specifically, unlike *Buyandsell.gc.ca*, which offered open access to procurement information, *Canadabuys.canada.ca* is restricted to registered suppliers. My new findings for the *Proactive Disclosures – Contract Dataset* remained largely unchanged from my 2022 observations except for improved input

assistance features, which were previously undetermined but are now present. Conversely, the use of semantic elements—previously confirmed—has declined and is no longer readily verifiable.

4.3.1 Conformance to the Web Content Accessibility Guidelines (WCAG)

I began my examination of the two platforms by conducting an end-user assessment wherein I positioned myself as an end user and examined each using my modified WCAG checklist. The evaluation was conducted over a two-week period in September 2022, during which I accessed and navigated *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* at different times, allowing for completely separate, focused analyses of each platform's accessibility features. To ensure that I did not overlook any important details, I repeated the assessment process for each platform four times, revisiting key pages and functionalities cross-checking the accuracy of my observations.

The information presented in Table 4.5 shows that both procurement platforms were found to broadly adhere to the four POUR principles: Perceivable, Operable, Understandable, and Robust. Both sites were also found to satisfy similar numbers of WCAG criteria (*Buyandsell.gc.ca* = 10; *Proactive Disclosures – Contract Dataset* = 11), with similar number of WCAG criteria being assessed as indeterminant (*Buyandsell.gc.ca* = 5; *Proactive Disclosures – Contract Dataset* = 4). However, the platforms did differ in areas pertaining to Understandability and Robustness.

When it came to perceivability, the content of both portals was found to be adaptable and distinguishable.⁶⁵ However, at the time of my assessment neither platform offered users text-based to alternatives non-text content. Put simply, no alternative text conveying meaningful information

⁶⁵ Within the context of WCAG guidelines, content is deemed adaptable if it can be presented in different ways, and distinguishable if it is easily seen and heard. See, WEC, Accessibility Principles. <https://www.w3.org/WAI/fundamentals/accessibility-principles/>

Table 4.5 Modified WCAG-based Accessibility Assessment Findings, September 2022⁶⁶

Principle	Evaluation criteria	<i>Buyandsell.gc.ca</i>	<i>Proactive Disclosures – Contract Dataset</i>
Perceivable	Text Alternatives (e.g., large print, braille, speech)	No	No
	Alternative for time-based Media	Undetermined	Undetermined
	Adaptable Content	Yes	Yes
	Distinguishable	Yes	Yes
Operable	All functionality of the content is operable through a keyboard	Yes	Yes
	Timing is not an essential part of the event or activity presented by the content	Yes	Yes
	No flashes, blinks, stripes	Yes	Yes
	Navigable:		
	➤ Each page has descriptive title indicating its content in title tag	Yes	Yes
	➤ link purpose	Yes	Yes
➤ location map	Yes	Yes	
➤ breadcrumb trail	Yes	Yes	
	Content can be controlled with pointing device other than keyboard (i.e., Input Modalities)	Yes	Yes
Understandable	Readable:		
	➤ Text content is readable by user and assistive technologies	Yes	Yes
	➤ Default human language of each page can be programmatically determined	Yes	Yes
	Predictable website features	Yes	Yes
	Input assistance: Assistance available when users make mistakes	Undetermined	Yes
	Input assistance: Labels/instructions provided when content requires user input	Undetermined	Yes
	Input assistance: When requiring user to submit information, at least one of the following is true:		
➤ Reversible: Submissions are reversible	Undetermined	Undetermined	
➤ Checked: User-entered data checked for input errors, and opportunity to correct is provided	Undetermined	Undetermined	
➤ Confirmed: Mechanism available for reviewing, confirming, and correcting information before finalizing submission	Undetermined	Undetermined	
Robust	Is the code correct and valid?	Undetermined	Undetermined
	Does the web page use semantic elements when appropriate?	Yes	Undetermined

⁶⁶ The term ‘undetermined indicates situations where I was unable to confirm or assess the presence or functionality of a particular feature due to a lack of clear indicators, insufficient information, or limitations in the available data that prevented formulation a conclusive judgment.

accompanies the image(s) on either platform. This violates Guideline 1.1 (Non-text Content) of the Web Content Accessibility Guidelines (WCAG) 2.0, which requires that all non-text content (e.g., images, videos) be provided with text alternatives. This lack of compliance also stands in contrast to the GoC's web accessibility standards, which mandate that accessible alternatives be provided for all non-text content to ensure equal access for all users.

In terms of operability, both platforms met the WCAG criteria at the time of my assessment insofar as they were easy to navigate and all features could seemingly be used without difficulty. For example, both allowed for keyboard-only access, avoided hosting content that could cause physical discomfort (e.g., flashing or blinking elements), and provided clear navigation tools, including descriptive page titles and breadcrumb trails.⁶⁷

Results differed somewhat across the two platforms regarding the third principle WCAG principle, 'understandable.' Both sites were equally readable, meaning their content could be understood by a literate person, with or without the aid of assistive technologies, and additional information to assist in understanding the content was provided (e.g., The *Proactive Disclosures – Contract Dataset* includes a downloadable data dictionary and a detailed "Guide to the Proactive Publication of Contracts" that define key terms and reporting requirements, thereby supporting user comprehension). They both also appeared to meet the predictability standard insofar as the information and features on both sites were presented in a manner that flows in a logical order.

The main difference observed between the two sites in terms of 'understandability' pertained to input assistance. At the time the assessment was conducted, Buyandsell.gc.ca did not provide features to guide users during form submissions or data entry processes, such as error

⁶⁷ The term 'breadcrumb trails' refers to a secondary navigation aid that displays the user's current location within the hierarchical structure of a website. Typically presented as a horizontal list of clickable links (e.g., Home > Services > Procurement), breadcrumb trails assist users in understanding their position on the site and enable easy navigation back to higher-level pages.

prevention or input validation mechanisms. The *Proactive Disclosures – Contract Dataset*, on the other hand, was found to meet two of the three requirements of this criteria (i.e., the website offered options to assist users in avoiding errors, and where content required user input, clear instructions for doing so were provided). For *Buyandsell.gc.ca* input assistance was rated as 'undetermined,' meaning, at the time, I was unable to confirm whether such support was available during user interactions with the platform.

As for the fourth principle, Robust, *Buyandsell.gc.ca* appeared to meet this standard with the effective use of HTML elements that help define the structure and meaning of different parts of the web page, enabling browsers and assistive technologies to correctly interpret and display the content. However, I was not able to determine whether *Proactive Disclosures – Contract Dataset* was using semantic elements⁶⁸ where appropriate. This is because the platform's code structure did not provide clear indicators or sufficient documentation to confirm the use of semantic markup. Certain sections of the site lacked the necessary HTML tags, which hindered my ability to ascertain whether semantic elements were consistently applied throughout the content.

Overall, the observations from my human end-user assessment found that despite their both platforms falling under the authority of the federal government and broadly adhering to the POUR principles, they diverged somewhat in the extent to which they seemingly conformed to W3C's WCAG. Specifically, they each exhibited shortcomings that could limit their functionality for certain end-users. For example, the lack of input assistance identified on *Buyandsell.gc.ca* at the time of the assessment raised questions about its inclusivity insofar as users who rely on guided

⁶⁸ In human language, a semantic element is a coding element that uses words to clearly describe what that element contains. Elements such as <header>, <nav>, <section>, <article>, <aside>, and <footer> are examples of semantic elements.

interactions may have faced challenges. Similarly, the indeterminate use of semantic elements on the *Proactive Disclosures – Contract Dataset* could limit compatibility with assistive technologies, reducing its accessibility for some users.

The next step involved me running an accessibility test using the AChecker software tool employing WCAG 2.0 guidelines at the A and AA conformance levels. Level A represents the minimum accessibility requirements that a website must meet to be considered accessible (W3C, 2024). For example, ensuring that all images have alternative text is a Level A requirement. Without this, users who rely on screen readers cannot access important content. Level AA includes criteria addressing more common accessibility barriers. For example, ensuring text has sufficient contrast against its background for readability is a Level AA requirement (W3C, 2024). The returned report results from the accessibility test for each platform are presented in Table 4.6.

Table 4.6 Accessibility issues detected by AChecker, September 2022⁶⁹

	WCAG 2.0 (level A)			WCAG 2.0 (level AA)		
	Known	Likely	Potential	Known	Likely	Potential
<i>Buyandsell.gc.ca</i>	13	2	358	15	2	414
<i>Proactive Disclosures – Contract Dataset</i>	1246	1	655	502	2	738

As the information Table 4.6 shows, at the time of assessment both platforms failed to meet the basic requirements of WCAG conformance levels A or AA.⁷⁰ In other words, neither platform was barrier-free, with the *Proactive Disclosures – Contract Dataset* having been found to have more

⁶⁹ The numbers reported under each WCAG level represent the number of issue instances identified by AChecker for the corresponding success criteria. ‘Known’ issues are confirmed accessibility violations. ‘Likely’ issues are probable violations that may require manual verification. ‘Potential’ issues are flagged items that might represent problems depending on context.

⁷⁰ The results I obtained when I revisited the site in May 2025 revealed a marked increase in accessibility issues. Under WCAG 2.0 Level A, known problems rose from 1,246 to 2,371, and potential problems from 655 to 1,343, while likely problems remained at 1. For Level AA, known problems increased from 502 to 951, and potential problems from 738 to 1,394, again with likely problems unchanged at 1.

accessibility shortcomings overall, than its counterpart. The report generated for the *Proactive Disclosures – Contract Dataset* showed a high number of known issues at A (n=1246) and AA (n=502) levels.⁷¹ These issues primarily related to presentation, navigation, compatibility with assistive technologies, and input assistance. At conformance level A, the issues reported related to the platforms not providing labels and instructions when content required user inputs and website navigation, respectively:

- Not every input element had an associated label or contained text describing the purpose of the form control. This level A requirement is intended to help users, especially those with cognitive, learning, and language disabilities to enter information correctly. It can also help prevent users from making incomplete or incorrect form submissions.
- ID attribute values. Not all ID attribute values were unique on the web page. This issue is known for causing problems for assistive technologies. When an ID is duplicated, the coding will act upon only the first instance of that ID.

At conformance level AA, the evaluation report identified 502 known issues centring on the same concerns detected at level A, along with two others:

- Using bold element. Bold element should not be used to style text as most screen readers will not announce these changes to the screen reader user.⁷² According to WCAG 2.0, when emphasizing a word or passage of text with high importance, the webpage should instead use tag.
- Header nesting - header following h1-h5 was incorrect. This error means that the web page contains a heading that does not follow the correct heading order. As recommended by WCAG, headings are useful for providing in-page navigation, assisting readers, web browsers, and assistive technologies in understanding how the webpage's content is structured. These two issues have a direct impact on the platforms' compatibility with assistive technologies.

With regard to *Buyandsell.gc.ca*, only 13 and 15 known issues were identified at level A and AA respectively. These were mostly associated with matters of layout and presentation,

⁷¹ I focused only on known issues generated by the AChecker because delving in-depth into issues associated with the 'likely' and 'potential' categories requires a level of expertise I simply did not and do not possess.

⁷² Screen reader is an assistive technology that helps people with visual impairments to use a computer by converting screen elements into speech or braille.

namely the font type and size used, and the lack of alternative text added to images. The *Proactive Disclosures – Contract Dataset* exhibited notably more accessibility issues (i.e., 1246 and 502 at levels A and AA respectively) than *Buyandsell.gc.ca*. Its identified shortcomings centred foremost around issues of navigation, input labels, and compatibility with assistive technologies.

In sum, both the human and software-based accessibility assessments revealed varying degrees of accessibility between the two platforms; some of for which *Buyandsell.gc.ca* was found to exhibit relatively fewer accessibility barriers than its counterpart, suggesting a stronger capacity to accommodate diverse user needs. The lack of certain accessibility aspects and indicators—such as missing alternative text for images, insufficient keyboard navigation, improper heading structures, and inadequate colour contrast—particularly on *Proactive Disclosures – Contract Dataset*, suggested the presence of limitations with the visibility of procurement information that could impede the ability of some users to access or interact with the platforms in ways that are purposeful to them. It seems plausible that such limitations could signify potential challenges to achieving the GoC’s procurement related transparency objectives.

4.3.2 Platform Usability Assessment

My assessment of platform usability also involved me conducting an end-user assessment wherein I again positioned myself as an end user and examined each platform using my usability checklist. The usability assessments were conducted over a period of two days in October 2022 and entailed me examining the two platforms simultaneously and separately. This allowed for direct comparisons of their features and helped guide my observation of each platform’s design and functionality from an end-user perspective. Here too, I repeated the usability assessments four times for each platform to minimize the likelihood of overlooking any usability challenges.

Table 4.7 Usability evaluation Findings⁷³

	Evaluation Criteria	<i>Buyandsell.gc.ca</i>	<i>Proactive Disclosures – Contract Dataset</i>
Overall design	Splash pages, auto play, and horizontal scrolling	Yes	Yes
Hyperlinked text	The text links have underlined link features	Yes	Yes
Navigational ease	No more than ten items in each navigational group	Yes	No
Findability	Is the website displayed on the first page of Google search results?	Yes	Yes
Readability	➤ Is the text is left-justified?	Yes	Yes
	➤ Is the website bilingual?	Yes	Yes

The findings from the human assessment of the platforms’ design and functionalities suggested that both met Akgül (2021)’s requirements for design, hyperlinked text, and readability (see Table 4.7). That is, neither platform included an introductory splash page, media did not autoplay, and both platforms fit within a standard browser window without requiring horizontal scrolling. Regarding hyperlinked text, on both platforms, all text links were underlined, changed colour when clicked, and were easily distinguishable from the main content. Some differences between the two platforms were observed in terms of navigational ease. *Buyandsell.gc.ca* had a simple navigational grouping with a few menu items, making it less likely that users' eyes skim over important information. By contrast, navigation at the *Proactive Disclosures – Contract Dataset* seemed overloaded, with more than ten items in one navigational group. This arrangement increased the likelihood that users might overlook crucial elements while navigating between pages. In terms of readability, both platforms had text left-justified and did not make excessive use of all-caps text. Additionally, both platforms were English/French bilingual, as required by the *Official Languages Act*, 1985. Both platforms also satisfied findability criteria insofar as they

⁷³ Upon revisiting the *Proactive Disclosures – Contract Dataset* in May 2025, the results for all six usability criteria were found to have remained unchanged since 2022.

appeared on the first page of Google search results at [Google.ca](#). when searched for using the terms “buy and sell,” and “government contracts.”⁷⁴

My next step was to assess the usability of the two platforms using the Google Mobile Friendly tool.⁷⁵ The results it returned included a screenshot of how the page appeared on mobile devices, and reports about any mobile usability issues it identified that could impede users who access the page using a mobile (i.e., small screen) device. The findings returned for [Buyandsell.gc.ca](#) identified four key issues hindering the site’s mobile friendliness (see Figure 4.2):

- Viewport not set. As in, the page lacks a viewport property, which tells browsers how to scale and resize the page to fit the screen size.
- Text too small to read. A significant portion of the page’s text is too small relative to the page’s width, making the text difficult to read on mobile devices.
- Clickable elements too close together. This issue means that when touch elements such as buttons and links are too close to one another, a user cannot tap a desired element with their finger without also tapping the neighboring button or link.
- Content wider than screen. The page’s content extends beyond the width of the screen, requiring users to scroll horizontally to view all the information, which can disrupt the browsing experience.

The 2022 test results for *Proactive Disclosures – Contract Dataset* did not identify any usability issues and indicated that, unlike its counterpart, it was mobile friendly, with no major issues identified (see Figure 4.3).⁷⁶

⁷⁴ The migration from [Buyandsell.gc.ca](#) to [Canadabuys.canada.ca](#) was already underway during the 2022 desk-based analysis period. However, the former continued to be actively used by stakeholders and referenced in government documents. For completeness, I conducted additional searches in May 2025 to investigate the findability of [Buyandsell.gc.ca](#) via the Google search engine, which likewise returned the [Canadabuys.canada.ca](#) platform on the first page of results.

⁷⁵ The Google Mobile Friendly tool was a free diagnostic tool developed by Google to assess the mobile usability of a webpage. It examined elements such as responsive design, text readability, tap-target sizing, loading performance, and viewport configuration to determine whether a page meets mobile compatibility standards. Note: This tool was later retired by Google and replaced by Google PageSpeed Insights, available at: <https://pagespeed.web.dev/>

⁷⁶ Upon revisiting *Proactive Disclosures – Contract Dataset* in May 2025 I used Google PageSpeed Insights (available at <https://pagespeed.web.dev/>) to check the platform’s mobile device friendliness because the Google Mobile-Friendly Test used in 2022 has been retired. Consistent with the 2022 findings, the new tool reported the platform to be mobile-friendly with no issues identified.

Figure 4.3 Mobile-Friendliness Testing Results for *Buyandsell.gc.ca*, October 2022

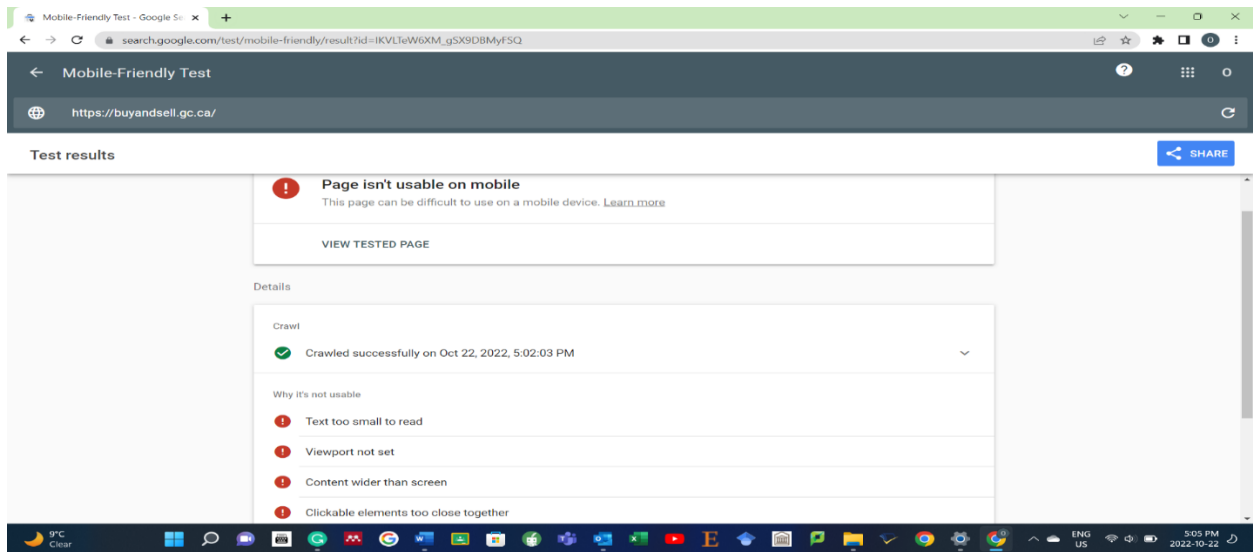
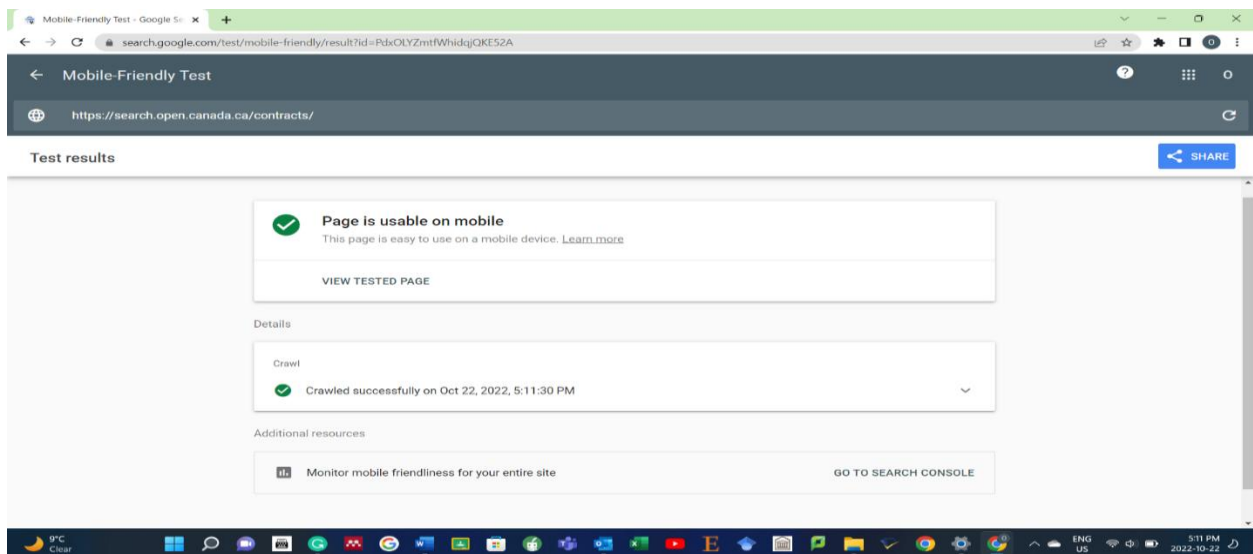


Figure 4.4 Mobile-Friendliness Testing Results for *Proactive Disclosures – Contract Dataset*, October 2022



In sum, the human-assessment of both platforms suggested that they each exhibited adequate compliance with usability standards, including visual design, ease of locating content, navigation, and readability. These attributes are recognized as contributing positively to the visibility of procurement information by enabling users to access and engage with content

efficiently. However, the automated assessment test identified mobile usability barriers on [Buyandsell.gc.ca](https://buyandsell.gc.ca), which, at the time of the assessment, may have restricted access to procurement data on smaller devices. The [Proactive Disclosures – Contract Dataset](#) was found to be free of such limitations.

4.3.3 Content Quality Assessment

My assessment of the quality of content on the two platforms also began with me positioning myself as an end user and examining each platform using my quality of content checklist. The assessment was conducted over four days in November 2022. I spent approximately two days on each platform per session reviewing all contracting-related data available on each platform. To minimize the likelihood of overlooking any details and to account for potential variances in content presentation, both platforms were examined four times independently.

Using my checklist (see table 4.4), I examined both sites to determine whether the pre-identified types of information were available to ordinary users. The main difference between the two sites appeared to rest on the absence of contracting and contract-specific content at the [Proactive Disclosures – Contract Dataset](#). The platform does include certain contract-level details and lacks a broad range of procedural and contextual information, including—among other elements—tender notices, award notices, criteria for adjudication, bidder details, and progress updates (see Table 4.8).

Not surprisingly, [Buyandsell.gc.ca](https://buyandsell.gc.ca), which supported operational needs throughout the procurement cycle, was found to have more of the types of information interest parties may seek about all stages of the procurement cycle. To this end, it made visible and accessible to interested parties a comprehensive range of information enabling them to track a portion of the GoC’s procurement activities. By contrast, the [Proactive Disclosures – Contract Dataset](#) platform seemed

to be designed primarily for reporting purposes, and this was, and remains, reflected in the types of information it makes available to users. Put simply, it does not make visible nor provide access to several types of information needed to monitor procurement activities which, in turn, may constrain capacity to support external oversight and transparency in real-time.

Table 4.8 Evaluation of Quality of Content, November 2022⁷⁷

	<i>Buyandsell.gc.ca</i>	<i>Proactive Disclosures – Contract Dataset⁷⁸</i>
Tender notice	Yes	No
Contract specifications	Yes	No
The contract location	Yes	No
Procurement entity	Yes	Yes
The original contract value	Yes	Yes
The criteria for adjudication of contracts	Yes	No
Award notice	Yes	No
Bidder information	Yes	No
Awarded contractor name	Yes	Yes
Awarded contractor address	Yes	No
The contract timeline	Yes	Yes
The contract template	Yes	No
Amendments value	Yes	Yes
Amendments date	Yes	No
Progress update(s)	Yes	No
The list of prequalified contractors	Yes	Yes
Contract history	Yes	Yes
Requests for clarification	Yes	No
The monitoring procedures	Yes	No

4.4 Conclusion

The assessment of *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* revealed differences between the two platforms in terms of accessibility, usability, and content quality. In terms of accessibility, *Buyandsell.gc.ca* exhibited fewer barriers, suggesting it is better equipped to accommodate diverse user needs. The *Proactive Disclosures – Contract Dataset* presented more

⁷⁷ Items were rated as ‘No’ for a variety of reasons. In some instances, the information was either not explicitly labeled or categorized, making it difficult to identify (e.g., tender notices and progress updates); in other instances, the information was simply absent from the platform (e.g., bidder information and award notices).

⁷⁸ Upon revisiting *Proactive Disclosures – Contract Dataset* in May 2025, the results across the 19 content items remained unchanged from the November 2022 assessment, with no differences observed in the types of information provided.

challenges than its counterpart, when it came to navigation and compatibility with assistive technologies. Regarding usability, both platforms met the baseline usability criteria outlined in the developed checklist, but [Buyandsell.gc.ca](#) exhibited mobile usability limitations (e.g., difficulty navigating on smaller devices) that could hinder engagement via mobile devices whereas [Proactive Disclosures – Contract Dataset](#) appeared to offer a more seamless experience across devices. In terms of content quality, [Buyandsell.gc.ca](#) was found to offer a more comprehensive set of information than its counterpart. This was not unexpected given that the two platforms are oriented to different aspects of public procurement.

The observations emerging from the first phase of my study suggested that [Buyandsell.gc.ca](#) provided a high level of visibility for particular types of operations-centred procurement information that is oriented foremost to those who engage directly in procurement activities. Despite also being procurement-centred, the [Proactive Disclosures – Contract Dataset](#) platform does not support the conducting of procurement activities such as bid submissions, bid evaluations, or tender-related operations. Instead, it provides visibility into post-award contract information, which also is vital to overseeing and monitoring public procurement activities but is less likely to be of particular interest to those actually doing the procuring and transacting.

This said, [Buyandsell.gc.ca](#) remained relevant to civil society actors who engaged in monitoring procurement practices just as some of the finalized contract information available through the [Proactive Disclosures – Contract Dataset](#) remains a valuable resource for private sector actors

In turn, this suggests a need for examining how well the features of the two platforms align with the diverse roles and expectations of the private sector, civil society, and government stakeholders, including the extent to which the information provided at the two platforms is

complete, timely, and relevant to stakeholders' interests. Likewise, the role of the government, as the operator of these platforms, remains unclear. These unresolved issues point to the need for assessing whether and how information that is visible and accessible is used to inform the voice/engagement facet of transparency. It is these considerations that informed the questions posed to the key informants in the second phase 2 of my project, and it is to this that our attention turns in the next chapter.

Chapter 5: Vision and Voice – Private Sector Perspectives

This discussion in this chapter focuses on private sector actors' perspectives about information visibility on the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms and the articulation of their voice, more broadly, in the Canadian public procurement environment. The discussion in this chapter is divided into six sections. The first elaborates on the interview design and the process of recruiting key informants for the second phase of my project. Section 2 focuses on the design and implementation of the interview protocol. Section three presents the methods used for analyzing the interview data. In Section four and five, the perspectives offered by private sector key informants are presented and analyzed. Section six concludes the chapter with a short discussion of the insights garnered from the private sector key informants and the implications to which they give rise.

5.1 Interview Design and Participant Recruitment

Phase 2 of my project involved conducting key informant interviews aimed at understanding:

1. the private sector, civil society, and government perspectives about the challenges associated with accessing and using timely, relevant, and high quality procurement information (i.e., visibility) at the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms;
2. challenges encountered at these two platforms that constrain their ability to engage in both transaction and non-transaction procurement-related activities (i.e., voice); and
3. challenges faced by the GoC in meeting stakeholders' diverse and augmenting procurement transparency.

Key informant interviews are a qualitative research technique that involves conducting in-depth, semi-structured or unstructured conversations with individuals who possess specialized knowledge, expertise, or unique positional insights about the topic of study and who are able to provide insider knowledge about the subject matter (Kvale, 2009; Kumar, 1989). Such interviews usually rely upon open-ended questions and probing discussions to collect detailed information about the topic at hand. They are particularly useful for exploring complex issues, uncovering

hidden challenges, and understanding specific local contexts or unique circumstances that often are overlooked or difficult to capture using quantitative research methods (Longhurst, 2003; Marshall, 1996).

Table 5.1 Rationales for Selecting Key Informants

Private Sector	Civil Society Organizations (CSOs)	Federal Government
<ul style="list-style-type: none"> ➤ Active participants in bidding processes ➤ Perspectives valuable for: <ul style="list-style-type: none"> (i) revealing practical challenges hindering users' ability to navigate procurement platforms; and (ii) identifying barriers to voice (e.g., lack of feedback mechanisms) and vision (e.g., presence of clear and accessible information) 	<ul style="list-style-type: none"> ➤ Critical role in monitoring public procurement systems and advocating for mechanisms that enable meaningful participation and feedback in procurement-related decision-making ➤ Perspectives valuable for understanding how well or not procurement platforms address transparency, inclusivity, and public engagement concerns. 	<ul style="list-style-type: none"> ➤ Primary operator of public procurement systems ➤ Perspectives valuable for garnering insights into operational challenges faced and strategies for meeting stakeholder expectations (i.e., transparency, accessibility, accountability).

With this mind, I set about to identify English speaking individuals working in senior level positions within the private sector, civil society, or federal government who were directly involved in public procurement activities in Canada.⁷⁹ My guiding premise was that such individuals would possess unique insights into the visibility and voice (i.e., engagement) aspects of the federal government's public procurement activities and processes (see Table 5.1) By engaging with individuals from these three groups, I sought to gain a deeper understanding of how visibility and voice are influenced by accessibility to, usability of, and the quality of information available to users of the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms.

In conducting the interviews, I used both exploratory and standard interview techniques to facilitate semi-structured discussions. Paraphrasing Oppenheim (1992), exploratory interview

⁷⁹ As Arabic/English bilingual speaker, my French language skills are not sufficiently proficient to have allowed me to have conducted interviews in French or to analyse French-language documents.

techniques are designed to develop ideas and extract the interviewees' opinions, views, and reactions regarding a specific subject matter. By contrast, standard interview techniques involve engaging in discussions oriented toward measuring attitudes and collecting other types of information. Adopting a semi-structured approach to the key informant interviews was ideal for the purposes of my investigation for two reasons. First, the flexibility of this approach offered a means of exploring the interviewees' perspectives in detail. Second, the use of semi-structured interviews in transparency-related open government research is a well-established as a means of collecting diverse perspectives from multiple stakeholder groups. (see, for example, Adler et al., 2023; Gintova, 2019; Saxena & Muhammad, 2018; Field, 2017; Roy, 2016).

Purposive sampling was used to identify potential key informants who were employed in either a senior level private sector, civil society, or government capacity. This sampling strategy is a non-probability technique that involves selecting participants based on the researcher's judgment and/or any other pre-specified criteria (Campbell et al., 2020; Curtis, 2011; Tongco, 2007). For the purposes of my project, a key advantage of this approach was that it allowed for the targeted selection of participants with the ability to provide insights about potentially sensitive subject matter that other sampling techniques (e.g., random sampling, convenience sampling, cluster sampling) do not allow (Campbell et al., 2020; Taherdoost, 2018). Using purposive sampling also ensured, at least in principle, representation from each of the three stakeholder groups, recognizing that even within the same category, participants might hold varying interests (Campbell et al., 2020). However, due to recruitment challenges—including COVID-19 restrictions, the sensitive nature of the topic, and participants' reluctance to engage in the interviews—the final sample ended up being somewhat opportunistic in nature. Despite my efforts at applying purposive strategies, key informants were ultimately included based on their availability and willingness to

participate—a pragmatic adjustment that ensured data collection could proceed despite these constraints while still capturing perspectives across the three stakeholder groups. Ethical clearance for recruiting participants and conducting the interviews was obtained from the Research Ethics Board of the University of Ottawa (see Appendix D).

The recruiting process involved identifying and selecting participants on the basis of publicly available information pertaining to their job titles, organizational affiliations, departmental roles, and relevant experience in procurement-related activities. The sources of this information included: [LinkedIn](#), the [GoC Departments and agencies database](#), the [PSPC](#) website, the [TBS](#) website, along with the [Buyandsell.gc.ca](#) and [Proactive Disclosures – Contract Dataset](#) platforms. The information gathered was used as a basis for ascertaining the subject matter expertise of potential interview candidates. I reached out to 72 potential participants in total, of which only 13 agreed to meet with me; two from the private sector, four from civil society organizations, and seven from the federal government (see Table 5.2). I acknowledge that a research sample of this size constrains my ability to generalize what emerged from the interviews to the broader public procurement environment.

Table 5.2 Key Informants

	Private Sector	Civil Society	GoC	Total
No. of Requests	36	18	18	72
No. of Key Informants	2	4	7	13

5.1.1 Identifying and Contacting Firms

Some 36 firms were identified through the contract histories, standing offers, and supply arrangements categories then publicly available on the [Buyandsell.gc.ca](#) and [Proactive Disclosures – Contract Dataset](#) platforms. It merits noting that the publicly available procurement-related information at both platforms does not identify any individuals, only firms. This meant that

in order to identify potential interviewees from the private sector, I had to begin by first contacting the short-listed firms to identify the person(s) best suited to speaking with me. To establish contact with potential interview candidates within each of the 36 firms I relied on email, telephone calls, and, in some instances, the contact feature at a firm's website. Initially, I sent emails to each firm's general email address. This yielded no responses. I had telephone numbers for ten firms, which I used to contact them directly. For the 26 remaining firms, I used the contact feature on their websites to outline the purpose of my research and to request my being put in contact with an appropriate person to potentially participate in my study.

Once relevant individuals within the 36 firms were identified, I sent each person an email message requesting their participation. These messages included a brief introduction to my research project, an explanation of the value of their insights to promoting procurement transparency, and a request for their participation in an interview. The message also assured their anonymity.

In total, I received 19 declines, 16 non-responses, and one expression of a willingness to participate. Of the 19 refusals, 13 explicitly stated they were not interested, offering no further explanation. The six (n=6) remaining respondents expressed apprehensions about potentially disclosing sensitive information (n=4) and fears about potential conflicts of interest arising from their participation (n=2). I responded to these concerns by offering additional clarification about the scope of my project, its relevance to their firms' operational priorities, and the potential benefits of their participation in promoting procurement transparency. I also assured them that I was not inquiring about any sensitive or contract-specific information. Of the six (n=6) respondents, one reconsidered and opted to participate.

Follow-up emails were sent to the 16 non-responsive firms one week after my initial outreach, and a second follow-up email one week later. Ultimately, only two individuals from the private sector agreed to participate, one who was employed with a firm specializing in consulting and digital solutions, and the other with a firm in the construction sector.

5.1.2 Identifying and Contacting Civil Society Representatives

A total of 18 potential civil society participants were identified based on their engagement in advocating for open government, transparency, and public participation in government procurement processes. Some of these individuals were initially identified through my participation in the online open government and transparency-related event Open Gov Week 2022.⁸⁰ Others were identified through snowballing. It is worth noting that a subject matter expert, whom I had the good fortune to be introduced to by my dissertation supervisor during the research proposal stage of my project, also served as a consultant of sorts for my project. This individual assisted, in part, by suggesting and introducing me to four (n=4) civil society advocates, who were included in my pool of potential participants.

To verify and supplement the initial information I possessed about potential civil society key informants, I used publicly available information on *LinkedIn* to learn more about their areas of expertise and interest. In some instances, this also helped me obtain their contact details.

I contacted the 18 potential civil society participants via email, inviting them to take part in my study. Their responses fell into four categories: Six individuals (n=6) declined, with one person stating their participation would not add meaningful value because their work focused on

⁸⁰ This was a virtual event organized by the OGP that took place online from May 16 to 20, 2022, with participants joining from various locations worldwide. For more details, see: <https://www.opengovpartnership.org/events/open-gov-week-2022/>

jurisdictions that have made greater progress than the GoC in reforming and opening government procurement systems. This individual responded to my email stating:

I don't think our participation will be valuable to your research. Once Canada makes some progress on its new electronic government procurement system, we might see more opportunities to engage with the government. As it is, not much has changed in recent years, and we focus our efforts on governments who are more actively making or considering changes.

Five individuals (n=5) did not respond. I sent follow-up emails to each of these individuals one week after my initial message, but this did not elicit any response. Unlike my approach with private sector participants, I did not follow up with phone calls because I did not have telephone numbers for these individuals.

Four individuals (n=4) responded requesting further clarification about what I was looking for. Two of these individuals suggested there was a disconnect between the scope of my project and the central focus of their organization's work. A third sought additional details about other participants, which I informed them I could not disclose because of confidentiality considerations. The fourth individual expressed having limited familiarity and engagement with the platforms central to my study. I responded by providing additional information about my project's scope and relevance to broader transparency and accountability objectives in public procurement, emphasizing how their expertise could offer valuable insights. Ultimately, one of these individuals opted to participate.

Only three (n=3) individuals agreed to participate in their initial responses to my query, bringing the total number of civil society participants to four (n=4).

5.1.3 Identifying and Contacting Government Officials

Through my participation in Open Gov Week 2022, I identified two government officials involved in open government initiatives relating to public procurement in Canada. Using the publicly

available government Electronic Directory Services (GEDS)

<<https://gedssage.gc.ca/en/GEDS?pgid=002>>, I was able to obtain their contact information.

These two individuals subsequently referred me to additional possible key informants associated with other relevant departments.

Through a snowballing process, where each referred contact suggested further individuals, I identified seven individuals from PSPC, seven from the TBS, and two from other government departments. Combined with the two initial officials I had identified, this brought the total number of potential government participants to 18.

I sent these 18 individuals email messages requesting their participation in my research project. Of the 18, eight (n=8) declined. The reasons given for not participating included the perceived irrelevance of the topic to their specific roles (n=4), insufficient time (n=3), and scheduling conflicts (n=1). In each instance I responded by providing additional information about the study's relevance to their respective government departments and areas of work, and reiterated my willingness to meet at a date, time, and location of their choosing. None of these individuals acknowledged my follow-up.

Seven (n=7) individuals promptly responded to my initial request. Of these, five (n=5) expressed initial willingness but had reservations, and two (n=2) individuals agreed to participate. For those with reservations, the concerns centred on the need for clarification about the type of information being sought during the interviews, particularly regarding the scope of the questions and whether they would involve inquiries about specific contracts. I responded by assuring them the interviews would focus on general practices and broader themes relating to open government initiatives and public procurement, and that no sensitive or confidential information would be requested. All five individuals subsequently agreed to meet with me.

Three (n=3) individuals did not respond to the initial email nor to the follow-up messages sent out in the two subsequent weeks after my initial request. In total, seven key informants from the GoC agreed to participate in the study.

5.2 Interview Protocol Design and Implementation

The reader will recall that the observations from the desk-based phase of my project identified limited accessibility to procurement data, inconsistencies in the presentation of information, and gaps in the communication of procurement outcomes across the [Buyandsell.gc.ca](#) and [Proactive Disclosures – Contract Dataset](#) platforms. Informed by these observations, the questions comprising the interview protocol were designed to probe and better understand challenges relating to both information visibility in procurement processes and stakeholders' ability to engage (i.e., voice) in these processes.

Prior to conducting the interviews, I piloted my interview protocol in two stages. The first involved my meeting with and obtaining detailed feedback about my questions from two subject matter experts.⁸¹ This exercise involved informal discussions wherein these individuals reviewed my draft questions, assessing their clarity, structure, and alignment with my research objectives. Their feedback focused on ensuring the questions were appropriately targeted for each stakeholder group and phrased to facilitate meaningful responses.

In the second stage, I conducted two pilot interviews, both with friends. In each session – one conducted in person and one online – I sought to replicate the interview format, paying particular attention to the types of responses elicited from my questions and the flow of the conversation. The goal was to identify any unclear questions, ensure the timing for each interview section was appropriate, and practice my interviewing technique. Based on the feedback received,

⁸¹ These individuals were introduced to me by my dissertation supervisor and are internationally recognized experts in open contracting and e-procurement.

I refined the phrasing of the questions to eliminate ambiguity and reorganized the interview sections to address the key themes and topics within the allotted interview time frame of 60 minutes.

Once the key informants confirmed their willingness to participate in my study, interviews were scheduled at mutually convenient times. Semi-structured interviews were conducted with 13 individuals, with all conversations loosely structured around seven themes. The meetings were conducted over a period of several months spanning from November 2022 to December 2023.⁸² All meetings took place using the Microsoft Teams (n=12) and the Google Meet (n=1) platforms, with each session typically lasting approximately 60 minutes in duration.

The interviews with members of each stakeholder group were structured around particular issue areas relevant to their respective positions in the public procurement context (see Table 5.3).

It merits noting that during the meetings not all questions prepared for the individual interviews were posed to every interviewee within the same category, nor were they asked in the same sequence. This flexibility was necessary in order to adapt to participants' varying experiences, perspectives, and specializations. For example, in the civil society category, some interviewees leaned more toward discussing procurement transparency from the angle of open government data, while others, drawing on their experience, concentrated on assessing the existing challenges and opportunities for participation in government policy-making

⁸² Due to scheduling constraints and the challenges of securing participants, the interviews took place over a period of 13 months.

Table 5.3 Interview Issue Areas⁸³

	Issue Area	Domains investigated
Private Sector Actors	Platform Utilization and Accessibility	<ul style="list-style-type: none"> ➤ Extent to which <i>Buyandsell.gc.ca</i> and <i>Proactive Disclosures – Contract Dataset</i> are used. ➤ Frequency of using these platforms; relevance of information available; and challenges encountered in accessing and interpreting the information provided.
	Tender Submission and Notification Processes	<ul style="list-style-type: none"> ➤ Clarity and efficiency of bid submission process. ➤ How firms are informed of successful or unsuccessful bids; timeliness and sufficiency of information provided
	Complaints, Appeals Mechanisms, and consultation	<ul style="list-style-type: none"> ➤ Channels available for submitting complaints or appeals; perceptions of the fairness and responsiveness of these mechanisms. ➤ Barriers to using/exercising these options. ➤ If and how procurement authorities consult with private firms about procurement services, and barriers to engagement
Civil Society Actors	Access and Information Quality	<ul style="list-style-type: none"> ➤ Frequency of accessing government procurement platforms; challenges faced in doing so. ➤ Whether available information is meaningful, timely, and presented in a user-friendly format.
	Feedback and Government Consultation	<ul style="list-style-type: none"> ➤ Opportunities to provide feedback on procurement platforms; whether inputs are adequately considered. ➤ If and how government consults with civil society interests when planning changes to public procurement-related systems.
Government Actors	Challenges and Information Visibility	<ul style="list-style-type: none"> ➤ Challenges faced in: meeting accessibility standards, ensuring visibility of procurement information, and aligning practices with stakeholder expectations. ➤ Specific challenges relating to compliance with the Official Languages Act.
	Stakeholder Engagement and Participation	<ul style="list-style-type: none"> ➤ How government initiatives aim to solicit, manage, and integrate stakeholder feedback. ➤ Influence of OGP on procurement processes, particularly in relation to transparency and accountability.

Each interview began with an introduction and contextual briefing that involved me reiterating the purpose of the interview and reminding the participant of both its voluntary nature and the confidentiality measures being taken to ensure their anonymity. This was followed by a preliminary discussion in which I asked the participants to share their broad, general thoughts

⁸³ For a full listing of the interview questions for each stakeholder group. See, Appendix E

about the public procurement process in Canada. In five instances (2 private sector, e.g., delayed responses to bid clarifications and limitations of Buyandsell.gc.ca; and 3 civil society, e.g., weak whistleblowing mechanisms, complaints redirected to PR channels, and incomplete procurement data), these preliminary thoughts highlighted concerns warranting more detailed exploration in the subsequent discussion. The main portion of the interview was structured around the thematic questions tailored to each stakeholder group. Given the semi-structured approach being used, I periodically introduced, as and when needed in accord with the participants' responses, more 'on the spot' probing questions. At the conclusion of each interview, the participants were invited to provide any additional comments or concerns not covered during our conversation. All interviews were recorded using both audio and video functions of Teams and Google Meet. In order to facilitate the accurate capture of participants' responses, I used automated transcription software and then, manually reviewed the generated transcripts to correct any errors. The transcriptions were then anonymized to protect participant identities.

Within two to three days of completing an interview, I followed-up with the interviewees, sending them a thank you message informing them about the next steps in the research process, and how their contributions would be used in the analysis. Also included in this message was a copy of the transcript from our meeting and an offer for them to review their responses. No participant requested alterations or indicated that any specific aspects of their discussions should be excluded from the analysis.

5.3 Analyzing the Interview Data

Given the exploratory nature of my investigation, thematic analysis was used interpret the information that emerged from the interviews. This method is particularly suitable for research aimed at identifying, analyzing, and reporting patterns within qualitative data (Herzog et al., 2019;

Maguire & Delahunt, 2017; Braun & Clarke, 2015). The flexibility and adaptability of thematic analysis makes it particularly useful for examining the complex and diverse issues raised by different groups with a stake in public procurement. This approach is especially well-suited for policy-related research because it allows for the continuous refinement of focus throughout the study thereby enabling the analysis to evolve in response to new insights and patterns as they emerge over the course of an investigation (Herzog et al., 2019).

For the purposes of this dissertation, the thematic analysis was structured around pre-identified vision- and voice-related domains of investigation. The visibility and voice elements of Meijer et al.'s (2012) transparency framework, were operationalized in the context of public procurement as follows:

1. Visibility, which refers to the extent to which procurement information is made available, accessible, and usable for stakeholders, was examined by asking the interviewees about their perspectives regarding:

- *Platform Usability*: How easily stakeholders can navigate the Buyandsell.gc.ca and *Proactive Disclosures – Contract Dataset* platforms.
- *Accessibility of Information*: Whether procurement information is presented in a way that meets accessibility standards and is available to all stakeholders, including compliance with the *Official Languages Act*.
- *Information Quality*: The relevance, accuracy, timeliness, and user-friendliness of the information provided, as well as its comprehensiveness and level of detail.

2. Voice, which refers to the ability of stakeholders to engage in, and influence, procurement processes was examined by asking the interviewees about their perspectives regarding:

- *Stakeholder Engagement*: How stakeholders are consulted, how their feedback is collected and integrated, and the mechanisms available for them to voice concerns or suggestions.
- *Feedback Mechanisms*: The perceived effectiveness of channels for submitting complaints, appeals, or general feedback, and stakeholders' perceptions of their fairness and responsiveness.

The process of thematic analysis I employed involved three steps:

1. *Familiarization with the interview transcripts.* This first stage involved reviewing the interview recordings and transcripts to gain a comprehensive understanding of the information collected. This process began with my listening to the audio and watching the videos four times while simultaneously following along with the transcripts. I also re-read the transcripts on their own multiple times. During the reviews, I identified recurring comments and concerns pertaining to the pre-identified issue areas outlined in Table, 5.3 and documented them using an excel spreadsheet. This process enabled me to familiarize myself with the arguments, claims, ideas, and perspectives advanced by the interviewees, and to begin informally identifying points of convergence and divergence across their various views.
2. *Coding the Transcripts.* The second step consisted of me coding the transcripts by hand, using a colour-marking system wherein key informant comments relating to each issue area were highlighted in accord with the colour-coding scheme set out in Table 5.4.⁸⁴ During the analysis process, I also made margin notes about specific observations, key statements, and noteworthy patterns emerging from the transcripts, such as challenges in accessing procurement information, concerns regarding transparency, and issues relating to feedback mechanisms. The margin notes were helpful in keeping track of contradictions, missing details, and patterns across stakeholder groups.

⁸⁴ See Appendix C for illustrative excerpts of interview transcripts with manual coding applied using the colour-marking scheme.

Table 5.4 Colour-Marking Scheme for Interview Transcripts

Colour	Element	Issue Areas
Yellow	Vision: Visibility of procurement information	<ul style="list-style-type: none"> ➤ Platform Utilization and Accessibility ➤ Access and Information Quality (Civil Society Actors)
Green	Voice: Stakeholder participation in the procurement process	<ul style="list-style-type: none"> ➤ Complaints and Appeals Mechanisms (Private Sector Actors) ➤ Feedback and Government Consultation (Civil Society Actors) ➤ Stakeholder Engagement and Participation (Government Actors)
Red	Overlapping: Passages that overlap between Vision and Voice.	N/A
Pink ⁸⁵	Indeterminate: Passages that do not clearly fit in one category	N/A

3. *Comparative Analysis Across Stakeholder Groups*. The third step involved comparing and synthesizing the colour-marked transcripts to identify how vision (i.e., visibility) and voice (i.e., engagement) were expressed across private sector, civil society, and government stakeholders. Given the small size of my research sample, I did not see any advantage or need to analyze the interview transcripts using software. Instead, I opted to conduct the analysis by hand. This approach had the added advantage of ensuring the full context of participants’ narratives was

⁸⁵ To resolve ambiguities wherein the connection to vision or voice was not clear, I closely re-reviewed, pink-highlighted passages. For example, references from civil society interviewees to “the lobbying registry” were highlighted in pink because they did not directly relate to either visibility (i.e., vision) or stakeholder participation (i.e., voice). Pink -coded passages were analyzed separately within the broader analysis framework to ascertain their relevance and potential impact on vision and voice.

preserved, ensuring that subtle connections were recognized. Guided by the issues areas listed in Table 5.3, I analyzed the interview transcripts to uncover patterns and differences in how the key informants reported experiences of visibility and voice. This cross-group comparison focused on identifying common challenges and unique perspectives relating to platform usability, accessibility of information, stakeholder engagement, and feedback mechanisms. The information presented in Tables 5.5 and 5.6 provides a summary example of how cross-group patterns were organized for my analysis.

Table 5.5 Cross-Group Comparison of Issue Area Perspectives - Vision

	Private Sector	Civil Society	Government
Platform Usability	<p>“The platform is difficult to navigate, and it is hard to find the information we need for bidding.”</p> <p>“Five years ago, I’d say submitting bids was horrendous... Now you’re uploading them... I think they’ve done as good a job as they can probably do.”</p> <p>“Not all buying vehicles have gone there. I still see a lot on merx.com operating in the old way</p>	<p>“The user interface is not intuitive, which makes it challenging for us to access relevant data,”</p> <p>“The systems suck. The systems are horrible.”</p> <p>“You’re reading through 100,000 different contracts... and there’s no consistent tagging or theming by governments. They’re outdated categories”</p>	<p>“Our vacation request system still says ‘Copyright 2000,’ it runs on a Citrix emulator because it’s too old for modern computers.”</p> <p>“So, if you're buying, say, a commercial database system, Oracle or otherwise, you're locking yourself into a whole structure of things... You realize you're spending \$20 million a year on Oracle licenses, and at that point, it's too late to get out.”</p> <p>“Government IT leaders say, ‘Let’s replace all 12 legacy systems at once!’ But when the mega-project fails, you’re left with nothing—no old system, no new system, just chaos.”</p>
Accessibility of Information	<p>“The challenge is really once you get the opportunity: is the information and data included? That's a challenge.”</p> <p>“They’ll give you the information they feel comfortable giving you, and that’s about it.”</p> <p>“We have a large bid that we’re working on... Three sets of questions we sent in... We don’t have an answer, and this thing is gonna close in a couple of days.”</p>	<p>“Access may be open in theory, but it's not meaningful access for civil society—there are too many practical and resource-related barriers.”</p> <p>“You need existing relationships with government to even access the right information. If you don’t, it’s almost impossible”</p>	<p>“Official language requirements can discourage data release altogether. It’s easier to withhold information than to translate a 200-page technical document no one budgeted for.”</p> <p>“Anytime there's a large-scale procurement, we typically have a bidders conference where they offer the opportunity for suppliers to engage with the procurement officer to ask questions about the solicitation for clarifications, etc.”</p>
Information Quality	<p>“Some RFPs are written quite well... others are full of holes require back-and-forth contact with the authority to get clarity.”</p> <p>“We had to ask the same question seven different ways before we got an answer — that’s a huge issue for accurate bidding.”</p>	<p>“If a contract says the company is a numbered company... there's a reason why they don’t want to be identifiable.”</p> <p>“Most RFPs, the first 30 pages have nothing to do with the current contract... just legal mumbo jumbo.”</p> <p>“It’s very hard to know who made the decisions or how much money went into specific initiatives.”</p>	<p>“Some solicitation documents are 100 pages, some are three... it's very hard for someone to read that without using... artificial intelligence... to validate that.”</p> <p>“Some departments may avoid releasing datasets altogether because of the cost and effort of translating them. There's no penalty for not publishing, but there is a risk of official languages complaints if they do so incompletely.”</p>

Table 5.6 Cross-Group Comparison of Issue Area Perspectives - Voice

	Private Sector	Civil Society	Government
Stakeholder Engagement	<p>“We provide input during consultations, but it is unclear how our feedback is used or whether it leads to any changes.”</p> <p>“There’s no obligation to keep us in the loop even if they cancel or modify the contract, we don’t always know.”</p> <p>“They could at least notify the second-place bidder if they terminate the first one, but they don’t always do that.”</p>	<p>“The consultation processes feel tokenistic. We are invited to provide input, but there is little evidence that our feedback is taken seriously.”</p> <p>“That’s accessible, but it’s not equity in procurement... putting something up for everyone to see doesn’t mean people can actually act on it”</p> <p>“Only if you’re in the ecosystem, then yes, you do get notices. But if you’re outside of the ecosystem... then you won’t see it ever”</p>	<p>“We have made efforts to improve consultation processes, but there is still room for improvement in how we integrate stakeholder feedback.”</p> <p>“People making decisions don’t have the expertise they need... the timeline for government IT projects, the lack of effective feedback loops means you might not realize a bad technology decision for another three years”</p> <p>“A salesperson says, ‘AI will solve everything!’ Leaders nod because they lack tech expertise. Any engineer would ask, ‘What data? How trained? What biases?’ But no one invites engineers to the table.”</p>
Feedback Mechanisms	<p>“You can submit an ATIP request, but they’ll give you only what they feel comfortable sharing.”</p> <p>“Yes, there’s a process to file complaints, but it’s very time-sensitive. If you’re late by a day, you don’t qualify.”</p> <p>“We had an opportunity to express our case. At the end of the day, legal decided that, OK, what? Let's move on. Like, it's just gonna take so long to fight out.”</p>	<p>“Yes, there are functions where you can appeal... but who has the time and resources to actually do that?”</p> <p>“There’s never acting upon feedback... it’s just a checkbox: ‘This person appealed. Check. We read it.’”</p> <p>“We don’t have a real whistleblower function unless it’s a scandal at the scale of the WE Charity affair.”</p>	<p>“If you’re evaluating a company’s bid, you’re not allowed to consider their past failures. You can only judge what’s in the proposal, even if you know they usually deliver terrible results.”</p> <p>“It’s safer to spend \$20M on a Deloitte PowerPoint than to try building something in-house. If the PowerPoint fails, no one blames you. If the project fails, it’s another Phoenix disaster.”</p> <p>“Anytime there's a large-scale procurement, they typically have a bidders conference... The procurement officer's responsibility is to translate the questions and answers in English and French and publish that against the tender notice.”</p>

5.4 Private Sector Perspectives About the GoC Procurement Ecosystem

Private sector firms are one of the primary stakeholders in the government procurement process. In this section, I present the perceptions, experiences, and challenges reported by the two key informants from the private sector who agreed to meet with me.

5.4.1 Familiarity with Government Procurement Platforms

The interviews with the participating private sector actors began with me asking about the frequency with which their firms engaged with the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms. PB1 reported that *Buyandsell.gc.ca* was their firm’s primary choice for accessing procurement information, searching for contracting opportunities, reviewing past contracts, and submitting bids. They further noted that the forthcoming *Canadabuys.canada.ca* appeared to be more robust than its predecessor. PB2 indicated that their firm tended to use *Buyandsell.gc.ca* for purposes similar to that which had been reported PB1.⁸⁶ However, they noted having greater familiarity with *merx.com*, a privately operated platform specializing in public tenders at the federal, provincial, and municipal levels.

According to PB2, *merx.com* tends to be more popular among small and medium-sized firms, in part, because it exhibits fewer accessibility and interface-related issues than the GoC-operated platforms. PB1 and PB2 both reported their firms made only limited use of *Proactive Disclosures – Contract Dataset*. PB1 further specified that their firm’s primary use of the dataset was to review historical contracting data for such purposes as understanding market trends and benchmarking their bids based on historical contract records contained in the dataset. Both PB1 and PB2 emphasized that the procurement platforms most frequently used by their firms (e.g.,

⁸⁶ The migration from *Buyandsell.gc.ca* to *Canadabuys.canada.ca* began in 2021 and was completed in November 2024. Both interviewees were aware of the ongoing transition and referred to ‘*Buyandsell.gc.ca*’ throughout our discussions.

[merx.com](#)), particularly for searching contract opportunities and reviewing market trends, provide the latter type of information free of charge.

According to PB1, information pertaining to the scope of work being procured was most important for their firm. They placed great importance on ascertaining whether the scope of work in tenders was adequately defined because such information is crucial to ensuring the opportunity aligns with a firm's area of expertise and that it can fulfill the requirements. PB2, on the other hand, noted that their firm's primary interest in navigating procurement websites leans principally toward learning about new contracting opportunities and, typically, searching for job descriptions, locations, and requirements.

Commenting on differences in the types of information sought by users, PB1 stressed that the capacity of procurement platforms to meet the diverse information needs of private actors, including that of their own firm, was crucial to suppliers being able to make informed decisions, tailoring bids to tender requirements, and identifying opportunities that align with suppliers' competencies. In their view, this capability influences perceptions of broader government functions, particularly in promoting the visibility of the procurement process and ensuring fairness. While PB2 did not directly address the role of procurement platforms in providing targeted information, they expressed concerns about the overall fairness of the procurement system. Specifically, they noted a lack of clarity in procurement requirements, particularly in the construction sector, where market concentration among a few dominant players foments doubts about equitable access to opportunities.

5.4.2 Usability and Accessibility of the Procurement Platforms

PB1 asserted that the frequency with which firms faced difficulties when submitting bids through [Buyandsell.gc.ca](#) today is very much reduced when compared to the state of affairs that existed in

the late twenty-teens. As per this individual, submitting bids electronically on the platform used to be exceedingly challenging and could even be described as “horrendous.” This, in their view, was primarily due to technical obstacles associated with sending large files. Specifically, increases in the number of required documents to accompany bids and the resulting increase in the size of the digital file needed for submission outpaced advancements and updates in the technology used by the platform to accommodate the information demands contractors were placing on those submitting bids. As a result, firms responding to requests for proposals (RFPs) often found themselves having to submit their offers via email. In PB1’s view many of these technical shortcomings have since been addressed.

Echoing this view, PB2 also maintained that the GoC’s procurement platforms had undergone a noticeable transformation for the better since the twenty-teens. Nonetheless, they asserted that an on-going notable limitation with Buyandsell.gc.ca was its lack of support for real-time bidding, a feature available on non-federal government-operated platforms such as merx.com, which allows potential suppliers to submit live offer prices during the bidding process. In commenting on this matter, this individual noted that despite complex tools having been implemented on Buyandsell.gc.ca, the bid submission procedure is more straightforward on merx.com.

According to PB1, consideration of the timeliness of procurement information requires distinguishing between two types of information. The first, general information, is historical in nature, pertains largely to past contracts, and usually is not time sensitive. The second type of information is, however, time sensitive. It comes into play once a supplier has expressed interest in a specific contracting opportunity or submitted a bid. Here, the interested party may seek additional information about the request by sending inquiries to the designated procurement office

listed in the tender documentation. PB1 reported that, on Buyandsell.gc.ca, the promptness with which such requests are answered is consistently problematic regardless of the information's impact on the offer or potential damage to the bidding firm. These delays, PB1 claimed, are largely due to internal processes within the contracting parties rather than any shortcomings with the platform itself. As they saw it, the root cause of the delays rested in bureaucratic inefficiencies or a lack of prioritization within the government agencies responsible for handling procurement inquiries.

Expounding on this state of affairs, PB1 shared a recent experience about their having to email a request for additional information seven times via different channels to the contracting party. No response ever was received, resulting in the loss of an opportunity to bid on a contract worth hundreds of thousands of dollars. In another instance that took place shortly before our meeting, PBI's firm had sent a set of questions about an RFP they were evaluating. At the time of our meeting, the firm had still not received the information they had requested despite the tendering process being set to close a few days after the interview.

Once a bid has been successful, the next step involves informing the winning party. Typically, this is done by the designated contracting office sending the winner a release letter and a draft copy of the contract through the platform used in the bidding process, which the winner then reviews, signs, and returns before the official contract is issued. As per PB2, the specifics of the notification process depend on the procurement platform and the type of bid. For example, with live bidding sessions, the evaluation criteria designate the winner as the bidder with the lowest price and, as such, unsuccessful bidders instantly know their status when another bidder submits a lower offer.

By contrast, and as reported by both key informants, when evaluations are based on more

than just the lowest price, unsuccessful bidders may be informed in any number of ways. In some cases, the contracting entity may opt to publish only the winning bidder's identity. Alternatively, unsuccessful bidders may be notified via a letter of regret. PB1 highlighted that the lack of consistent communication from the procurement authority often was problematic, prompting bidders to repeatedly seek updates about the progress of their bids. PB2 likewise mentioned that on several occasions, their firm had to make numerous calls and repeatedly send emails just to ascertain the status of their bid. As they put it, “We have to call and send emails over and over again only to know whether or not our bid has been successful.”

Deficiencies in ongoing communication between procuring entities and firms bidding on their RFPs extend to matters involving reaching out to contracting departments to express concerns or register complaints. According to the two interviewees, such deficiencies negatively impact upon both the usability of available information, and stakeholder engagement in both procurement transactions and procurement activities more broadly. PB1, for example, noted that despite there being a channel on platforms such as [Buyandsell.gc.ca](https://buyandsell.gc.ca) for appealing decisions, bidders must adhere to stringent time-sensitive restrictions guiding the recognition of appeals. To this end, the applicability of appeals frequently is contingent upon such issues as when they are filed, the elapsed time between their filing and when bidders were notified of a decision, the dollar value of the transaction, and the complainant's willingness to pursue the case legally and/or administratively.

[Buyandsell.gc.ca](https://buyandsell.gc.ca) offered a contact information link for direct communication with an officer regarding bid inquiries and provided a mechanism for filing complaints about ethical misconduct or for appealing decisions.⁸⁷ However, as per PB2, suppliers often perceive these types

⁸⁷ See, <https://canadabuys.canada.ca/en/how-procurement-works/procurement-process/following-bid>

of channels as inefficient and as offering limited likelihood of the procurement authority addressing appeals. In line with this view, PB1 suggested that poor communications and handling of conflicts contributes to a negative perception among suppliers about the government's willingness to actively involve them in procurement-related policy making and to meaningfully consider their feedback and inputs. They emphasized their dissatisfaction with the government's inconsistent responses to, and handling of, the key issues, asserting that firms frequently find their concerns are either inadequately addressed or met with vague assurances rather than concrete actions.

Expounding on this perception, PB1 recounted a situation their firms had experienced with Buyandsell.gc.ca in relation to their raising concerns about contractual procedures. Despite having the opportunity to present their case, the allocated timeframe was insufficient, and pursuing the complaint involved a complex process, including engagement with multiple entities and legal professionals. The prolonged duration of the proceedings led the firm to recognize the lack of viability of pursuing the matter any further, thereby prompting a decision to abandon the case and move on. This experience contributed to their broader skepticism about whether the GoC's procurement system truly adhered to principles of fairness and inclusivity, as the barriers to filing complaints seemed to disproportionately hinder firms from seeking redress.

In PB1's view, there is a large discrepancy between the government's slogans and written commitments regarding the importance of engaging with the private sector for a more collaborative procurement process and the actual effectiveness of its actions. They maintained that in spite of official rhetoric promoting transparency, participation and open government, the structural and procedural barriers firms encounter in practice suggest otherwise, reinforcing their perception of a disconnect between stated policies and actual implementation. This said, both PB1 and PB2

indicated there had recently been some slight changes in terms of a seeming increase in the frequency with which the GoC was distributing feedback forms and questionnaires to solicit the input of Buyandsell.gc.ca users. According to PB2, the private sector views this requested feedback as a positive development, even though it may not be directly relevant to the key issues in the bidding process.

To sum up, two key informants noted that despite improving in functionality, usability challenges persisted with Buyandsell.gc.ca. Concerns about the timeliness of information and communication during the contracting process were, in their view, ongoing. Such challenges, they argued often led to missed opportunities and increased operating costs and were perceived as impediments to effective engagement in policy-related decision making, limiting the ability of suppliers to voice their concerns about procurement activities and to engage meaningfully with authorities.

5.4.3 Information Findability and Quality

PB2 asserted that when it comes to finding desired information, they had observed numerous instances where colleagues encountered difficulties in quickly and easily accessing needed information on Buyandsell.gc.ca, and went on to suggest that some users might reasonably conclude the platform is not as user-friendly as it could be.

In discussing these types of challenges, PB1 suggested that perceptions of complexity often are subjective and likely to be influenced by such factors as the frequency of interaction with government procurement platforms as well as the experience, skills, and knowledge levels of individual users. They further added that, whereas finding information in the early stages of the procurement process (e.g., searching for contracting opportunities) tends to be a relatively straightforward matter, information-related challenges arise more frequently in the stages

following the bid decision, bid submission, and winning of contracts. PB1 maintained that, despite these limitations, Buyandsell.gc.ca users recognize that the platform generally demonstrates an acceptable level of consistency in terms of information navigation, structure, and other technical aspects relating to user friendliness and the ease of locating information. This individual also noted that, by comparison the *Proactive Disclosures – Contract Dataset*, Buyandsell.gc.ca platform experiences fewer navigational issues.

In PB2's view, progressing through the procurement process often is associated with encountering a lack of precise details, information, and data regardless of the procurement platform used. This said, they maintained that, even in the early stages of the contracting cycle, finding information on Buyandsell.gc.ca for tasks such as registration and account creation is more complicated than on other procurement platforms such as merx.com, which, in their view, boasts a more user-friendly layout and faster information retrieval. According to PB1, based on their past experiences, details such as security clearance requirements, start dates, and (if applicable) allowable on-site hours for company workers “can be found 90% of the time—almost always” on platforms such as merx.com. They lamented that when contracts are processed through Buyandsell.gc.ca locating such details had, in multiple cases, proven to be less straightforward, requiring direct contact with the procurement authority.

Regarding information quality, PB1 noted that the information on procurement platforms, including Buyandsell.gc.ca, is not consistently comprehensive or understandable, which occasionally necessitates direct contact with the procuring government department or agency for clarification. PB2 concurred, highlighting the presence of non-relevant information on Buyandsell.gc.ca when compared to merx.com. According to PB2, upon registering, merx.com allows suppliers to subscribe to specific categories or tags, such as industry sectors (e.g.,

healthcare, education, transportation), project type (e.g., construction, IT), or geographical regions, thereby narrowing the quantity of information received to opportunities from the upcoming job list. Recognizing the substantial volume of information potential suppliers must review with each contracting opportunity, both PB1 and PB2 agreed that such a filtering feature is crucial for enhancing information relevance, especially when making a bidding decision.

5.4.4 Other Challenges

In addition to the issues presented above, the two key informants from the private sector expounded upon other areas wherein challenges relating to engaging in online government procurement activities manifest themselves. One such domain, they suggested, was the lack of available information about contract revisions once contracts had been awarded. Highlighting a common practice across most of the GoC's procurement platforms, including Buyandsell.gc.ca, [Proactive Disclosures – Contract Dataset](#), merx.com, and other department-specific procurement systems,⁸⁸ PB2 confirmed that unsuccessful bidders are not notified about the scope, monetary value, and rationale behind post-award adjustments despite the importance of such information to all suppliers.⁸⁹ Initiating communication with the relevant government agency to formally request such information is, in their view, impeded by numerous bureaucratic obstacles and legal procedures, the overcoming of which entails expending notable resources. This, they went on to state, is a major reason why suppliers often choose not to pursue such inquiries. This practice also reportedly contributes to fostering a negative perception among suppliers about the fairness and

⁸⁸ Recall, department-specific procurement systems are platforms tailored to meet specialized needs, such as those used by Defence Construction Canada (DCC) for defence projects and the Canada Revenue Agency (CRA) Procurement Portal for IT systems and tax-related services.

⁸⁹ Such information can assist suppliers with refining future proposals because it contributes to a better understanding of how project requirements evolve in practice. Additionally, disclosing the scope, monetary value, and rationale behind adjustments contributes to greater transparency, reducing perceptions of favoritism or unequal treatment.

transparency of government procurement practices. As PB2 put it:

At the end of the day, we understand that the procurement system is not necessarily fair and that in construction, which is our area of work, there are a handful of major players in the Canadian construction market; such lack of clarity makes us believe that the procurement authority may require certain aspects of a job that only one or two companies can do or it may set the specifications for a specific product that only one manufacturer can produce or provide.

Another challenge identified by the interviewees is the procurement entity's recurrent requests for paperwork that has previously been submitted. According to PB1, each time a supplier secures a contract, irrespective of whether they have previously registered and submitted the information or if they are on the standing offers list,⁹⁰ they must resubmit a host of paperwork. This repetitive solicitation of paperwork is, in their view, cumbersome and needlessly time-consuming.

5.5 Analysis and Discussion

The observations and perspectives shared by these two key informants regarding their firms' interactions with [Buyandsell.gc.ca](https://buyandsell.gc.ca) showed, as anticipated, differences in both the frequency with which their firms made use of the platform and the types of information sought. These two individuals also noted the presence of enduring challenges with [Buyandsell.gc.ca](https://buyandsell.gc.ca) revolving around disparities in the usability and quality of information at the platform along with what they perceived as shortcomings in government procedures when it comes to actively engaging with private sector actors. The discussion below centres on the implications of the views advanced by

⁹⁰ A standing offer is an arrangement made by a potential supplier to provide goods and/or services at predetermined prices under specified terms and conditions. Once a supplier is placed on the standing offer list, they may receive invitations to bid on projects that fall within the scope of the agreement without needing to undergo a new competitive application process. Such information was previously hosted on [Buyandsell.gc.ca](https://buyandsell.gc.ca) see, <https://buyandsell.gc.ca/for-businesses/selling-to-the-government-of-canada/the-procurement-process/standing-offers#10>. The equivalent content can, as of May 2025, be found on the [Canadabuys.canada.ca](https://canadabuys.canada.ca) platform at <https://canadabuys.canada.ca/en/tender-opportunities/standing-offers-and-supply-arrangements>

these two individuals.⁹¹

5.5.1 Vision in the Procurement Process

In the realm of public procurement, timely access to information is crucial to enabling suppliers to make informed decisions about, and actively participate in, the bidding process. Understanding the scope of a tendered project is crucial to enabling suppliers to make informed decisions about whether an opportunity aligns with their area of expertise and if they can fulfill the requirements (Ackah & Dadzie, 2025; Akomea-Frimpong et al., 2024; Kirn et al., 2019; Osei-afokwa, 2014). The observations shared by PB1 and PB2 suggest the presence of several challenges relating to incomplete information on the [Buyandsell.gc.ca](https://buyandsell.gc.ca) platform.

To begin, the experiences related by PB1 and PB2 suggest that when it comes to [Buyandsell.gc.ca](https://buyandsell.gc.ca), users may encounter difficulties in quickly and easily accessing the information they need, and/or lack requisite skills for making purposeful use of the information provided. PB2 also noted that merx.com tends to attract more small and medium-sized firms, attributing this to its comparatively more accessible interface and fewer usability issues relative to [Buyandsell.gc.ca](https://buyandsell.gc.ca). The information- and technology-related challenges they describe align with the observations that emerged from my human-user and AChecker assessment of the platform's accessibility.

The information shared by PB1 and PB2 also pointed toward inadequate information visibility on the [Buyandsell.gc.ca](https://buyandsell.gc.ca) platform during key stages of the procurement process. Both individuals remarked that finding information during the early stages of the procurement process was relatively straightforward, with challenges emerging as different milestones (e.g., making the bid decision, submitting the bid, winning the contract) came to pass. Their observations alluded to

⁹¹ Obviously, I cannot draw any strong conclusions from their comments or generalize their observations to positions held by other private actors who have engaged with [Buyandsell.gc.ca](https://buyandsell.gc.ca) and, more recently, [Canadabuys.canada.ca](https://canadabuys.canada.ca).

deficiencies in the platform's transparency practices that possibly are at odds with the emphasis the World Bank (2020; 2017) places on information findability and visibility during the bid opening, evaluation, and award phases of the procurement process, including the availability of information about contract modifications and terminations. Any such determination is, of course, subject to further empirical scrutiny and validation.

These two individuals also expressed concerns about what they perceived as insufficient clarity and completeness of procurement information. PB1 noted information on Buyandsell.gc.ca is not consistently comprehensive or understandable, often necessitating direct contact with government agencies for clarification. Similarly, PB2 added that the procurement process is often hindered by a lack of precise details and other relevant information, regardless of the platform used. If their claims regarding this matter stand up to empirical scrutiny, this too, would point to the presence vision-related deficiencies negatively impacting upon procurement transparency.

5.5.2 Voice in the Procurement Process

When thinking about voice in public procurement activities, it is useful to distinguish between two distinct components of this process; one which pertains to the participation in procurement transactions (i.e., tendering, bidding, winning contracts) and another centring on the creation and implementation of procurement policies and regulations. Flyvbjerg (2013) and Meijer et al. (2012) and tend to situate voice foremost in the latter, macro-level context – i.e., *Who's voice is heard when it comes to decision-and policy-making about public procurement?*

By contrast, the two private sector participants in my study viewed voice more narrowly, at a micro level, focusing on decisions about whether and how to compete for government contracts. The ability of their respective firms to do so effectively, as they pointed out, depended heavily upon their capacity to seek out and receive timely clarifications about procurement

requirements, evaluation criteria, and post-award contract details. This, as noted by Mahuwi and Israel (2024), Girgvliani (2023), Loader (2018) and Harrison et al., (2012) is a cornerstone of informed participation in procurement transactions and underscores the importance of transparency and accountability in governance. The concerns expressed by PB1 and PB2 in relation both to obtaining clarifications relating to procurement matters and navigating the procurement process were not merely operational considerations. Both individuals linked these concerns with perceptions of a lack of fairness and integrity in the procurement process as manifest on [Buyandsell.gc.ca](https://buyandsell.gc.ca). Such delays, as they saw them, constituted consequential impediments to their ability to participate in a timely and informed manner and to articulate concerns or seek redress. Put simply, they questioned the level of procurement transparency afforded by [Buyandsell.gc.ca](https://buyandsell.gc.ca) precisely because they felt their voices were not being heard in relation to core operational components of the procurement process. This said, it is important to acknowledge that the experiences of PB1 and PB2, while illustrative of certain communication-related deficiencies, do not constitute sufficient evidence to comment about the severity or prevalence of these issues on the [Buyandsell.gc.ca](https://buyandsell.gc.ca) platform.

Likewise, PB1 and PB2's observations about a seeming increase in the GoC's distribution of feedback forms and questionnaires, is suggestive of efforts to enhance engagement with platform users and may, as they suggested, mark an attempt to improve feedback channels. However, as PB2 noted, despite broadly viewing this as a constructive step, the feedback solicited does not always align with where the most pressing concerns of many private sector actors rest; the tendering process.

5.6 Conclusion.

The findings presented in this chapter lend empirical support to the proposition that participation

in public procurement is multifaceted and spans several different forms of engagement. The experiences of the private sector actors reported in this chapter illustrated two of three forms in which engagement in procurement activities are manifest: (i) passive observation of procurement activities across Buyandsell.gc.ca, [Proactive Disclosures – Contract Dataset](#), merx.com, and other procurement platforms; and (ii) active engagement in transactional aspects of procurement including finding tenders, seeking clarifications, submitting bids, and, sometimes, challenging decisions through appeals mechanisms. Neither of the private sector interviewees had participated in procurement or open government consultations but they did report having observed such processes from a distance.

The experiences of the two key informants were illustrative of the interconnection between vision (i.e., visibility of information) and voice (i.e., engagement) at the operational level of procurement processes, specifically in relation to the usability of information for transaction-related activities. In certain instances, the presence of clear, accessible, and complete information about tender opportunities and criteria enhanced their firm's capacity to engage meaningfully in bidding and decision-making processes. In other instances, however, the availability of such information may not translate into effective engagement in transaction-related activities, as suppliers may lack the resources, capacity, or institutional knowledge to leverage the information effectively. This reflects a more complex dynamic where vision facilitates initial awareness, but voice remains constrained by factors such as limited access to consultation or the absence of formal mechanisms of engagement.

It is here that communicative impediments, such as delays in responses and/or lack of clarity from contracting parties can and do seemingly create barriers to stakeholder engagement in both macro and micro levels of the procurement process. A critical aspect of such impediments

rests in identifying who is responsible for providing clarifications. If the contracting parties (i.e., government departments and agencies) are delaying or withholding information, this suggests a possible lack of alignment or shared responsibility across government entities that, at best, serves to impede transparency and, at worst, suggests a possible lack of institutional commitment to transparency. Conversely, if PSPC, the department responsible for managing the Buyandsell.gc.ca and, now Canadabuys.canada.ca platform is at fault, this suggests inefficiencies and/or a lack of accountability within the department.

While such distinctions are important for internal accountability within the government, external stakeholders do not necessarily perceive such nuances. Whether delays or lack of clarity stem from PSPC's management of Buyandsell.gc.ca, suppliers most likely attribute these inefficiencies to the GoC as a whole and perceive them as evidence of broader systemic failures. This said, and given that I was only able to recruit two participants from the private sector, it is unclear whether the challenges expressed by these individuals reflect systemic level problems with Buyandsell.gc.ca or are isolated instances specific to two people and their respective firms. What was clear, however, is that the vision- and voice-related experiences of both key informants had diminished their trust in the procurement process and negatively impacted their view the GoC's commitment to transparency and accountability, ultimately undermining the 'voice' element of transparency.

In the next chapter attention turns to the perspectives of a small sample of civil society actors.

Chapter 6: Vision and Voice – Civil Society Perspectives

Civil society actors constitute the second key stakeholder group in GoC's public procurement activities. In this chapter, I present the perspectives and views of the key informants with whom I met from civil society organizations. The discussion is divided into three sections. The first sets out the observations emerging from my interviews with four civil society key informants regarding their experiences with, and perspectives about the GoC's procurement processes. The discussion in this section is anchored in vision (i.e., visibility of information) component of transparency. The discussion in section two also looks at civil society key experiences with, and perspectives about GoC's procurement processes but with a focus on the voice (i.e., engagement) component of transparency. Section three concludes the chapter with a short discussion of the insights garnered from the key informants and the implications to which they give rise.

6.1 Vision-Oriented Perspectives of Civil Society Representatives

In this section, I present the perspectives of the four key informants from four civil society organizations with whom I met. My discussions with these individuals focused on the experiences of, and the challenges encountered by, their respective organizations when engaging with the GoC's public procurement process. The observations they shared revealed, not surprisingly, differences in both the types of information sought and its purpose when engaging with the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms. These differences reflected the different roles and priorities of these individuals and the organisations with whom they are employed. Within my small research sample, civil society participants relied upon these platforms to monitor the allocation of public funds and track trends in specific sectors, with three of the participants using them primarily to access historical data or specialized procurement records.

Each of the interviews with four civil society participants began with a question about the frequency with which they and their organization used *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* and the purpose for their accessing these platforms. CS1 stated their organization frequently consulted the *Proactive Disclosures – Contract Dataset* to access contracting records and historical data. They also indicated that their organization made more frequent use of the privately operated *Bidsandtenders.ca* platform⁹² than *Buyandsell.gc.ca* because it was involved in securing contracts across provincial governments. CS2 and CS3 both reported familiarity with *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset*, noting these platforms were the main resources used by their respective organizations for accessing procurement contracting information. CS2 further explained that their organization used these platforms to access procurement information crucial for their oversight efforts, including tracking the allocation of public funds and expenditures, and ensuring accountability in budget transparency. CS3 emphasized that their organization primarily used of these platforms to access specialized datasets and procurement information relating to IT procurement and open government initiatives. CS4 shared that their organization largely accessed *Buyandsell.gc.ca* to regularly seek detailed information about technology-related contracts, particularly those involving government departments and agencies focusing on digital solutions. This information was gathered to track trends and opportunities within the Canadian technology sector and to assess the GoC's engagement with technology firms.

In their shared observations, these interviewees noted the presence of enduring challenges with *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* that revolved around

⁹² *Bidsandtenders.ca* is a Waterloo, Ontario based private online procurement platform that facilitates the bidding process for vendors interested in government procurement opportunities. The platform allows potential suppliers to create a Bidding System Vendor account. Upon registration, suppliers have the option to select commodity codes that correspond to the goods and services they offer. See, <https://www.bidsandtenders.ca/>

platform usability, information quality, and accessibility, as well as broader limitations in the government procurement process regarding opportunities for civil society engagement. For certain civil society organizations such as those whose employees comprised part of my research sample, a core aspect of their *raison d'être* hinges on the visibility of information about public procurement processes. Without access to such information, they face major challenges in monitoring government activities which, in turn, leads to gaps in oversight and accountability. The discussion in the remainder of this section is divided into three parts, each of which addresses distinct vision-related challenges the participants reported encountering in relation to their procurement activities.

6.1.1 Usability and Accessibility of the Procurement Platforms

CS1 asserted that using the Buyandsell.gc.ca and *Proactive Disclosures – Contract Dataset* platforms often involved notable usability-related challenges stemming from unintuitive layouts and inefficient search functionalities on that hindered users' ability to effectively locate and use vital procurement information. According to them, even routine tasks often require extensive trial and error, making the process unnecessarily time-consuming. They observed that the platforms' design assumes users possess the technical expertise needed to navigate complex interfaces without support. Additionally, they highlighted the absence of integrated user guidance, such as interactive tutorials or help prompts that could assist first-time users in navigating features of these platforms.

This individual further reported challenges relating to filtering and classification as impacting the platforms' usability. They explained that the absence of an effective filtering method made it difficult for users to identify contracts relevant to what they can supply among the thousands of contracts hosted by the two platforms. In explaining these constraints, CS1 shared that procurement contracts are typically classified into categories such as goods, services, or

construction projects. However, inconsistent tagging and outdated classification systems on the [Buyandsell.gc.ca](#) and *Proactive Disclosures – Contract Dataset* platform often resulted in the returning of incomplete or irrelevant search results, leading to wasted time and frustration. For example, CS1 described searching for contracts relating to digital solutions and smart cities. Searching for the term ‘smart city’ returned too few results, while using the term ‘consultation OR consulting’ generated an excessive volume of returns, making it difficult to filter for useful information. Similarly, the broad application of tags such as ‘data’ across multiple contexts complicated efforts to pinpoint specific IT and data-related contracts. These types of shortcomings parallel filtering and tagging related deficiencies identified by Noguerras-Iso et al. (2021), Dong and Ji (2018), and Ubaldi (2013) as hindering users’ ability locate and access information that is directly applicable to their tasks and objectives.

Concerns about both inconsistency in tagging (i.e., labeling and categorizing content) and theming (i.e., organizing content by topics or themes), and the use of outdated classification labels were echoed by CS4 who lamented the rigid search mechanisms at these platforms that require users to manually refine results through multiple iterations. They noted that both platforms lack intuitive filtering options, making it difficult to streamline searches based on practical criteria such as contract value or government department. Additionally, CS4 expressed experiencing frequent frustrations with the platforms’ overall responsiveness, citing slow load times and outdated design elements that contributed to inefficient workflows. In their view, such functional limitations created additional burdens for users attempting to complete procurement-related tasks effectively, especially time-sensitive oversight activities.

CS2 explained that despite allowing users to browse procurement opportunities, [Buyandsell.gc.ca](#)’s search and filtering options could be unintuitive for those unfamiliar with

procurement terminology. They likewise noted that in spite of providing access to contract information, the *Proactive Disclosures – Contract Dataset* platform does so using a raw spreadsheet format that requires users to rely upon external tools such as Excel for filtering and analysis. CS2 also shared that both platforms lack built-in tools for data processing and visualization, making it challenging for non-expert users to extract insights from procurement data. They argued that the reliance on external software reflects a broader usability deficiency. Specifically, the platforms are not designed with accessibility in mind for individuals and organizations lacking technical expertise. This, they claimed, constrained the ability to effectively monitor and assess procurement activities to only certain actors. This observation resonates with those of Nikiforova and McBride, (2021), Cravero (2019), and Fraundorfer (2017) who note that such disparities in access and usability undermine transparency and raise concerns about equity and fairness in procurement processes.

CS2 further compared these challenges to difficulties encountered with the GoC’s budget data. While technically accessible, this data is presented in large, unstructured datasets and lengthy documents that lack clear summaries or contextual explanations of the contents.⁹³ According to CS2, the lack of built-in tools for filtering or visualization, means that users must manually sift through extensive data to extract relevant insights—a task requiring technical proficiency in economics, statistics, and data analysis. They argued that this lack of user-friendly presentation limits accessibility and discourages meaningful engagement from stakeholders such as civil society organizations, small businesses, and members of the general public, who may lack the resources and/or expertise to effectively process complex government data. Building on these

⁹³ The Canadian federal budget and related datasets are publicly available through various government channels, including the Open Government Portal <<https://search.open.canada.ca/data/>> and Statistics Canada <<https://www150.statcan.gc.ca/n1/en/type/data>>.

concerns, CS2 went on to speculate that the complexity in data presentation might not be so much incidental as deliberate. Although they acknowledged that such an interpretation remains a matter of perception, they argued that if government entities were genuinely committed to improving accessibility and usability, they would take more proactive steps to streamline and simplify information before it was disseminated.

The concerns expressed by CS3 about navigating both platforms and accessing relevant procurement information focused foremost on the lack of structured instructional support. Echoing CS2's concerns about accessibility and usability, they argued that the presence of step-by-step guides or video tutorials offering users clear navigation instructions would mark a notable improvement. Without such resources, they argued, users unfamiliar with these platforms, and procurement systems more broadly, are forced to rely on trial and error which, in turn, contributes to a host of inefficiencies in tracking down and finding desired information as well as discouraging engagement in procurement-related activities.

6.1.2 Information Findability and Quality

When it comes to the ease of finding desired information on the Buyandsell.gc.ca and [Proactive Disclosures – Contract Dataset](http://ProactiveDisclosures-ContractDataset) platforms, all four civil society interviewees expressed concerns about users' ability to access comprehensive and meaningful content. For example, CS1 highlighted the challenge of locating information regarding vendor registration processes. Specifically, they noted that despite Buyandsell.gc.ca providing notifications about new opportunities, it was unclear how to progress toward becoming a vendor of record⁹⁴ and when one could start bidding. CS1 stressed that the application process for becoming a vendor of record is

⁹⁴ A Vendor of Record (VOR) arrangement is a government-approved list of vendors meeting certain procurement directive requirements. It operates for a set period, with defined terms, conditions, and pricing. Usually, it is established via a request for bids (RFB) distributed through relevant procurement channels. See, Tenders Ontario Portal (2015).

both time-consuming and costly, particularly for non-profit organizations. According to them, this challenge even arises during the initial phases of the procurement cycle, which is not technically part of the bidding process, but nonetheless sets the stage for specific opportunities their organization frequently pursued (e.g., public engagement consultations; digital transformation projects). They added that while this situation might not pose a challenge for larger corporations with dedicated personnel who track procurement opportunities, it creates a marked barrier for smaller entities lacking the resources to take advantage of, and actively participate in, government contracting.

CS1's concerns echo findings from Mutangili (2024b), Soylu et al. (2022), European Commission (2017), and OECD (2016a), which highlight how deficiencies in procurement information disproportionately disadvantage smaller actors, ultimately reducing competition and fairness in public contracting. They also align with broader concerns about incomplete and inaccessible procurement information creating barriers to entry, particularly for organizations with fewer resources, thereby reinforcing structural inequities as smaller firms struggle to efficiently navigate procurement procedures (Benmohamed et al., 2024; Schnell, 2020; Cravero, 2019; OECD, 2016c).

CS1 also drew attention to the insufficiency of procurement-related information on three other fronts. The first, also shared by CS4, focused on what they both perceived as a recurring practice of withholding the names of awarded contractors in public procurement. This practice, they argued, has marked implications both for procurement transparency and accountability within the GoC insofar as it obstructs the public's ability to verify whether contracts are being awarded fairly, assess potential conflicts of interest, and hold decision-makers accountable for procurement outcomes. According to CS3, government entities often justify the non-disclosure of contractor

names by citing privacy laws, a justification they view as a significant barrier to transparency.

The second insufficiency centred on perceived shortcomings with the details provided in the descriptions of contract records on both *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset*, particularly when it comes to identifying the entities to whom contracts have been awarded.⁹⁵ In their view, one of the most concerning aspects of this practice was that despite comprehensive information about awarded contracts being provided in the description section, the names of firms are frequently presented as codes. In their view, this practice renders the awarded companies unidentifiable, posing a notable challenge to ensuring transparency in the awarding process and to effective civil society oversight of publicly disclosed contracts.

The third shortcoming was anchored in a perceived lack of access to, and findability of, information about IT and digital procurement relating to law enforcement. As they put it:

We have no access to law enforcement procurement at any level. All law enforcement-related procurement is super inaccessible (CS3).

Echoing this view, CS1 expressed concerns that this restricted access creates an opaque environment, undermining accountability mechanisms within the procurement process. They explained that without proper oversight, the procurement of IT systems and digital tools—such as surveillance technologies or data collection software—risks unauthorized access to personal data, misuse of sensitive information, and other privacy violations. According to this individual, government entities consistently show reluctance to engage in meaningful dialogue with civil society organizations about how newly procured platforms and tools handle data. This gave them cause for concern on two levels. The first centred on whether law enforcement agencies gain access

⁹⁵ The interviewee acknowledged that the practice of not publicly identifying contract winners is negotiated on a case-by-case basis and is not standard or common across all contracts. They also acknowledged the possibility that there could be valid reasons (i.e., security and confidentiality considerations) for not making this information public.

to the data generated via new acquisitions—a situation that raises pressing ethical and legal questions, regarding privacy protections and accountability. Specifically, the opacity surrounding these acquisitions draws attention to such risks as unauthorized access to personal data, misuse of sensitive information, and potential privacy violations.

The second, focused on the dichotomy between law enforcement agencies potentially accessing data from tools procured by the government—such as surveillance technologies or data analytics platforms—on the one hand, while restricting access to information about tools procured by law enforcement agencies themselves on the other hand. Expounding on this issue, CS1 noted that the Ontario Provincial Police (OPP) and the Royal Canadian Mounted Police (RCMP) do not share procurement details with municipal, provincial, or federal government departments. This, as CS1 sees it, reinforces an imbalance in transparency, where law enforcement agencies benefit from access to government systems and data while restricting disclosure of their own procurement practices. The lack of transparency also leaves interested civil society actors unable to assess whether the technologies and systems procured by these agencies align with the public interest and/or whether they are used in ways that adhere to ethical standards.⁹⁶

CS2 observed opacity in another area of government procurement practices, highlighting difficulties in accessing publicly available information about decision-making authorities and interdepartmental communication protocols. They identified the difficulties they encountered in locating such information as impeding their ability to scrutinize procurement governance. This, they claimed, was evidence of a lack of transparency, as the challenges associated with finding

⁹⁶ These challenges align with broader scholarly discussions about the dangers of unchecked technological adoption in law enforcement. For instance, Hill et al. (2022) argue that unregulated deployment of facial recognition technologies (FRT) often occurs without adequate oversight, leading to mass surveillance and threats to fundamental rights. Similarly, Nesterova (2020) emphasized the ethical dilemmas associated with surveillance technologies and calls for implementing robust regulatory frameworks to ensure alignment with public interest and respect for privacy protections.

information hinder effective oversight and accountability of public procurement in Canada. To this end, their concerns broadly align with the notion that the absence of clear procedural details hinders efforts to ensure procurement decisions are made in a fair and accountable manner (Boots et al., 2024; Atkinson, 2020; United Nations Office on Drugs and Crime, 2013).

Expounding on this notion, CS3 expressed concerns about the limited information made available on *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* that is relevant to civil society needs, such as bid evaluation criteria, amendments to original contracts, and monitoring procedures. They critiqued both platforms for being primarily geared toward business efficiency and catering foremost to the private sector rather than being inclusive of civil society, academia, and the general public. In their view, this lack of inclusivity undermined the platforms ability to serve a broader range of stakeholders effectively.

Echoing CS3, CS4 pointed to recurring gaps in the procurement information made available on these two platforms. These gaps pertain to what CS4 perceived as a lack of clarity regarding whether past vendor performance is consistently considered in the evaluation process which, in turn, raises concerns about the consistency of its application across government procurement units. Emphasizing that reporting on contract outcomes is often incomplete, with insufficient details about whether contracts deliver value for money or meet quality standards, CS4 expressed concerns about the absence of unique identifiers for suppliers awarded government contracts. They explained that this creates confusion when tracking government spending in certain sectors or on certain contracts, especially with large corporations such as IBM that may operate under multiple names or subsidiaries.⁹⁷ To this end, both CS4 and CS1 expressed concerns

⁹⁷ The absence of unique identifiers means that contracts awarded to different branches or affiliates of a single parent company (e.g., IBM Canada; IBM Global Services; IBM Solutions) cannot be easily linked together which, in turn, makes it difficult to determine the total value of contracts awarded to the parent company. For example, a

about undisclosed corporate names in government contracts, linking these practices to issues of beneficial ownership⁹⁸ and highlighting their potential to undermine accountability and public trust in the government procurement system.⁹⁹ In the light of this state of affairs, CS4 suggested that the lack of comprehensive and transparent information complicates efforts to assess whether procurement decisions are, in fact, based on a full evaluation of vendor reliability and performance history. The concerns expressed here by CS4 and CS3 broadly align with Clarke and Boots' (2022) observations about the GoC's procurement practices. Specifically, that past performance is not systematically considered as a valid evaluation criterion, which increases the risk of inefficiencies and poor outcomes.

Three participants (CS1, CS2, CS4) identified the pervasiveness of delays throughout the government bidding process, particularly in processes associated with very tight and/or unrealistic deadlines as key barriers to effective procurement oversight. Here, their accounts pointed toward two interconnected causal factors. First, the presence of technological limitations that create bottlenecks in procurement systems. Second, the manifesting of institutional delays that serve to further compound existing technological shortcomings. As per CS1, delays in the provision of information are a recurrent issue and reflects the inherently sluggish nature of government

corporation like IBM might receive multiple contracts across different departments, but without a unified identifier, these contracts appear in procurement records as being awarded to separate entities. This fragmentation obscures the true scale of government spending with specific corporations, constraining the ability of oversight bodies and the public to monitor procurement activities.

⁹⁸ Undisclosed corporate affiliations and the complexities of beneficial ownership regimes obscure potential conflicts of interest and hinder efforts to address issues such as money laundering and foreign interference. As noted by Vieira (2022), in the absence of clear information about the ultimate beneficiaries of awarded contracts, the procurement process remains vulnerable to integrity risks, including favoritism, conflicts of interest, and exploitation by foreign entities.

⁹⁹ In Canada, beneficial ownership, as defined by the *Canada Business Corporations Act* (CBCA) and the Proceeds of Crime Money Laundering and Terrorist Financing Regulations (PCMLTFR), refers to ownership through trustees, legal representatives, agents, or other intermediaries. For corporations, this includes the names of all directors and individuals who own or control 25% or more of the shares. Recent amendments to the CBCA now mandate federally incorporated corporations to disclose beneficial ownership information. See, Vieira (2022).

operations. CS2 and CS4 also identified delays in obtaining information as a notable challenge in the procurement process insofar as they often render information irrelevant when it comes to the exercise of meaningful oversight. They noted that such delays can be attributed to the infrequent updates the GoC makes to its technological infrastructure, the lack of specialized personnel dedicated to ensuring prompt information dissemination, and the absence of timely responses from relevant individuals. These concerns appear to align with Hood's (2007) and Heald's (2006) distinction between real-time transparency—where information is disclosed as soon as it is generated—and retrospective transparency, where delayed disclosures limit their practical utility. They also appear to be consistent with the findings of Mendes and Voigt (2022), OECD (2016a), and Tirole (2015), who all suggested that time-lagged transparency diminishes accountability and limits civil society's capacity to meaningfully monitor, assess, and influence procurement outcomes.

Another information-related issue raised by the CS key informants focused on the extensiveness of the details included in contract descriptions on [Buyandsell.gc.ca](#) and [Proactive Disclosures – Contract Dataset](#). CS1 explained that prospective bidders must often navigate through 20 to 30 pages of contract details before being able to access the specific information they need. They further noted that the initial pages of contracts frequently contain content unrelated to the current contract, primarily consisting of the GoC's mandatory legal disclosures. In their view, and despite acknowledging its importance, the volume and placement of this disclosure information potentially overwhelms potential suppliers before they can access the contract opportunity details that initially captured their interest. In other words, these elements, serve a regulatory purpose while simultaneously obscuring and delaying access to key procurement-related information. To this end, CS1's contentions echo the challenges noted both by Fraundorfer

(2017) regarding challenges arising from the excessive presence of non-essential content and OECD (2018, 2016) in relation to the impediments such delays may present for civil society organizations attempting to systematically track public procurement processes.

In similar vein, CS4 highlighted inadequate data cleaning efforts by the GoC, identifying this as another barrier for users relying on government contracting data. They noted that inconsistencies, errors, and a lack of standardized formatting make it difficult to effectively navigate and interpret the information. According to them, this challenge is particularly pronounced in complex procurement environments where inconsistencies, formatting errors, or duplications can obscure critical insights. They further added that substantial data cleaning is essential to improving the accessibility and usability of the data, ensuring that users can extract meaningful insights without requiring extensive additional processing. CS4's concerns in this regard reflect a broader tension between the need to balance transparency with the need to ensure usability of procurement data.

6.1.3 Official Bilingualism

In addition to the issues outlined above, the four civil society key informants drew attention to an additional vision-related challenge they encountered when engaging with government procurement activities online. Namely, how official bilingualism is manifested on the [Buyandsell.gc.ca](https://buyandsell.gc.ca) and [Proactive Disclosures – Contract Dataset](#) platforms. CS2 was the most vocal of the three about this issue. During our meeting, they shared observations about the misalignment between Canada's two official languages in the public procurement context, acknowledging that the relevance of language-related issues may vary depending upon an individual's principal linguistic environment, and that the impact of these issues may not be consistent across all users. Nonetheless, they viewed the extent to which government procurement platforms comply with the

Official Languages Act, 1985 as a source of concern.¹⁰⁰ Specifically, CS2 noted that despite the provision of content in both official languages, there often are clear discrepancies between the English and French language versions of information materials on Buyandsell.gc.ca and *Proactive Disclosures – Contract Dataset*. According to them, translation errors and the use of inconsistent terminology that can lead to misunderstandings or reduce the clarity of the available information provided are all too common. CS2 emphasized that, despite the varying relevance of this issue across users, it can pose challenges for some, including civil society members, who like them, rely on these platforms to monitor government contracts in both official languages. These concerns align with broader discussions about best practices for bilingual and multilingual government communication, which emphasize clarity, consistency, and equitable access across all official languages (Grey & Severin, 2022; Scassa & Singh, 2015).

6.2 Voice-Related Perspectives of Civil Society Representatives

The discussion in this section is divided into two parts, each of which focuses on distinct vision-related challenges the participants reported encountering in relation to their procurement activities.

6.2.1 Whistleblowing and other reporting related challenges

During our meeting, CS3 raised concerns about government contracting practices, especially those involving consulting services and software development (i.e., intangibles; services). They noted that, in their experience, evaluating the value and impact of such contracts is more complex than for contracts dealing with tangible products. This, they suggested, was often due to incomplete documentation and difficulties in measuring intangible outcomes. CS3 pointed out that contracts for services, which frequently involve considerable amounts of public funds, often lack clear evidence of their public benefit which, in turn, fuels ongoing debates over the justification of

¹⁰⁰ The *Official Languages Act*, 1985 ensures that English and French are given equal status in federal institutions, requiring all government services and communications to be available in both languages.

government spending on such contracts, and how to report suspicious conduct and/or enforce accountability measures.

CS1 likewise expressed concerns about the lack of accessible channels for reporting suspicious conduct and/or offering recommendations to GoC procurement entities. Specifically, they were concerned about seeming impediments to whistleblowing, noting that individuals face notable barriers when seeking to raise concerns about questionable activities in the procurement domain. As per this individual, within the Canadian context, whistleblowing tends to gain attention or trigger institutional responses only after underlying issues have escalated into public scandals. They attributed this delayed recognition and action to the absence of a robust and engaged local press, as well as a limited number of journalists actively investigating and reporting on such concerns.

In the face of these shortcomings, they viewed the presence of formal mechanisms within bids and tenders that allow civil society to file appeals as inadequate on the grounds that, the demanding requirements and delayed responses from GoC procurement authorities often make it difficult for individuals to participate in the process and follow up due to a lack of time and resources. They further noted that even when responses do occur which, in their words “is rare,” effective action from the government is often lacking, rendering these mechanisms largely ineffective.

CS2 raised a related concern in highlighting that civil society activists often find their complaints or appeals redirected to individuals in public relations departments rather than to subject-matter experts or officials with decision-making authority within the GoC. This individual further added that this practice reinforces a supposed widely held belief among civil society actors that establishing pre-existing connections with government insiders is the most dependable avenue

for securing responses and accurate information.

Commenting on this a state of affairs, CS1 stated:

It leads us to believe, as members of civil society who are supposed to be stakeholders in the process, that it is just a checkbox showing that there is a means for individuals to appeal, and that is all.

Echoing these concerns CS3 pointed to Canada's so-called Whistleblower Protection Act¹⁰¹ as illustrating the gap between the perceived and actual effectiveness of the GoC's anti-corruption efforts. According to this individual, the Act's limited scope and inconsistent application within the public sector underscores marked shortcomings in its design and implementation. In their view, the underutilization of whistleblowing mechanisms by public servants reflects deeper systemic challenges, including concerns about fear, secrecy, and mistrust in the systems intended to protect those who report wrongdoing. Emphasizing that the lack of trust in the system stems from concerns about retaliation, inadequate safeguards, and insufficient follow-through on reported cases, CS3 maintained that whistleblowers are ostensibly deterred from coming forward, rendering the Act largely ineffective in practice.¹⁰²

The concerns about whistleblowing expressed by the civil society participants broadly align with Vatanchi's (2019) findings regarding whistleblowing in Canada which suggested that existing legislation limits the types of disclosures permitted and imposes specific conditions on whistleblowers that can discourage potential whistleblowers from coming forward, narrowing the

¹⁰¹ The *Public Servants Disclosure Protection Act*, 2005, empowers employees in the federal public sector to report potential wrongdoing. Although it covers most of the federal public sector, certain entities including the Canadian Forces, elected officials and their staff, as well as employees of the House of Commons and the Senate, are excluded from its provisions. See, <https://laws-lois.justice.gc.ca/eng/acts/p-31.9/>. See also, Competition Bureau of Canada, Protection for whistleblowers. August 23, 2024. <https://competition-bureau.canada.ca/en/bid-rigging-price-fixing-and-other-agreements-between-competitors/protection-whistleblowers>

¹⁰² These observations align with the findings of the Canadian COVID-19 Accountability Group's (2020) findings, which highlighted the systemic limitations of existing whistleblower protections. The group argues that existing whistleblower protections are fragmented and ineffective, offering inadequate protection for most workers—particularly those outside the government sector—and leaving private sector employees and other stakeholders vulnerable when reporting wrongdoing.

scope of those willing to report misconduct and undermining the effectiveness of whistleblowing mechanisms. However, these observations should now be reassessed in the light of recent legislative efforts, particularly the introduction of Bill C-290 in 2022 which proposed amendments to the *Public Servants Disclosure Protection Act*, including expanding the definition of protected individuals, enhancing access to redress mechanisms, and increasing penalties for reprisals. As of May 2025, Bill C-290 is under review in the Senate.¹⁰³

6.2.2 Engagement related challenges

CS3 was critical of what he perceived as GoC initiatives often seemingly prioritizing superficial, token actions over genuine, substantive engagement with civil society (i.e., checkbox mentality). They asserted that a lack of meaningful engagement with civil society undermined the effectiveness of mechanisms aimed at addressing wrongdoings and other concerns (e.g., integrity frameworks, procurement disclosure portals, and conflict of interest reporting systems). According to this individual, such actions contribute to fostering a negative perception among civil society about such mechanisms as the lobbying registry,¹⁰⁴ which, in their view, is largely symbolic rather than substantive.

Dissatisfaction with the GoC's communication with stakeholders in the public procurement and the implications thereof for engagement was expressed by all four civil society key informants. Zeroing-in on the GoC's performance in engaging civil society stakeholders when proposing changes to the procurement process, policies, and/or strategies, CS1 described such engagement as being largely restricted to a narrow network primarily composed of private contractors who

¹⁰³ For a detailed summary of the proposed whistleblower reforms and their implications, see: <https://www.parl.ca/legisinfo/en/bill/44-1/c-290>

¹⁰⁴ A lobbying registry is a system where lobbyists are required to register and disclose certain information about who they are representing, what they are lobbying for, and any financial transactions involved. See, Dinan (2021). For more information within the context of the GoC see: <https://lobbycanada.gc.ca/app/secure/oc1/lrs/do/guest>

have already established themselves within the procurement ecosystem through a history of successful bids.

CS2 echoed this dissatisfaction, adding that the efficacy of these engagements often depended on the specific government department and the timeframe for policy or regulatory adjustments. They observed that time-sensitive, or rushed, approaches tended to favour actors with established government relationships, excluding essential voices. Drawing on their organization's experience in the United States and Canada, CS2 noted significant differences in government consultation practices between the two countries. In their view, U.S. government departments were more proactive than their Canadian counterparts in seeking expertise, inviting diverse participants, offering various engagement formats, and in making comprehensive information readily available on government websites.

Canadian government departments and agencies, they claimed, often lack consistent outreach and typically collaborate only with a limited number of organizations with whom they have established relationships that, often times, have developed through lobbying. CS2 asserted that this 'personalized' approach created barriers for new civil society actors and activists seeking to engage in procurement-related consultation processes. They also noted that access to consultation opportunities and spaces of engagement in Canada varied widely depending on the responsible minister, the department's capacity, and consultation timelines, resulting in inconsistent levels of clarity and inclusiveness.

The success of government initiatives aimed at fostering openness and engagement relies heavily on leveraging ICTs to facilitate collaborative communication with various stakeholders, including civil society actors and other members of the public (Lauriault et al., 2021; Sandoval-Almazan & Gil-Garcia, 2016; Harrison et al., 2012; Meijer et al., 2012). CS2 was also critical of

the quality of government communication channels, lamenting what, in their view, was the tardiness of the GoC in adopting and implementing new ICTs. According to CS2, GoC procurement authorities continue to rely on outdated systems which forces civil society activists to rely on dated communication channels such as telephone calls when raising concerns about procurement processes.¹⁰⁵ They described this situation as creating notable challenges in engaging meaningfully with authorities and delaying issue resolution. They questioned why more advanced technologies, such as real-time feedback systems, were not being adopted, and stressed the potential of such tools in offering enhanced communication efficiency and streamlined interactions.

CS3 underscored what they held to be the substantial influence wielded by corporate lobbyists and private sector entities on government decision-making. They noted that, by comparison, lobbying efforts from civil society and public interest groups were limited, often due to resource constraints and lack of access to decision makers. Emphasizing the need for greater inclusivity, CS3 advocated for formally involving public interest actors in policy making to enhance civil society representation and foster a more balanced approach to the making of public procurement policies.¹⁰⁶ They were critical of what they perceived as a lack of comprehensive participation mechanisms, particularly with PSPC. They further asserted that, despite the GoC's proclaimed commitment to transparency, public participation, and open data principles, the absence of effective engagement with PSPC and comparable government entities undermines these

¹⁰⁵ Despite advancing this claim, CS2 did not provide any specific example(s) to support it.

¹⁰⁶ The integrity of government procurement processes depends on a lobbying registry that ensures equitable access and transparency in policy influence <<https://lobbycanada.gc.ca/app/secure/ocl/lrs/do/guest>>. CS3 observed that the registry primarily records formal interactions, leaving significant aspects of lobbying influence undocumented. They emphasized that corporate entities benefit from additional channels of access, including unrecorded communications and longstanding professional networks, while civil society organizations face resource constraints that limit their ability to engage in procurement-related policy making.

commitments and limits civil society's ability to provide meaningful oversight or fully participate in the GoC's procurement processes. For example, CS3 shared a recent experience during a consultation about procurement policy relating to diversity in federal contracting. They asserted that PSPC presented its framework as a "*fait accompli*," leaving little room for stakeholders to propose meaningful revisions or express concerns about its potential impact on smaller vendors and civil society organizations.

Similarly, CS4 critiqued the current state of participation and feedback mechanisms in the public procurement domain, pointing to a perceived lack of direct outreach and consultation on the part of the GoC. They maintained that, despite the availability of both contact options for data-related inquiries and feedback on [Buyandsell.gc.ca](https://buyandsell.gc.ca) such mechanisms were inconsistently implemented across government departments and agencies. This, they suggested, was illustrative of a lack of standardization and integration of procurement practices into the broader governmental consultation framework.

The examples presented above make clear that, in the eyes of the four civil society participants in my research sample, government action in the public procurement domain tends to be oriented toward creating the appearance of engagement without necessarily fostering substantive inclusion. These individuals acknowledged government-led efforts to promote participation, but their experiences suggested, to them at least, that such initiatives often remained confined to formal compliance rather than facilitating genuine dialogue between stakeholders. Their shared view broadly aligns with the arguments advanced by Asare et al. (2025), Ruvalcaba-Gomez (2019), Fraundorfer (2017), and Piotrowski (2015), who all note that, when treated as formalities, transparency initiatives often fail to promote genuine participation or strengthen democratic accountability. When diverse voices, including those of civil society and small

business interests, are excluded from decision-making, procurement processes risk becoming less reflective of the public interest. Beyond undermining the voice component of transparency, the absence of inclusive participation may also erode fairness and trust in public procurement, ultimately shaping procurement decisions in ways that do not fully account for diverse stakeholder needs.

Another engagement-related challenge noted by the civil society key informants was linked to funding, which they perceived as creating systemic barriers to fuller engagement in procurement-related monitoring and policy making. Two factors were identified as being at play here. The first was the ‘cost of participating.’ CS1, for instance, recounted an experience for which their members were required to pay \$4,000 per participant to attend a police services conference involving procurement-related discussions, while private tech suppliers were charged \$400 per representative. As they put it, such cost disparities illustrate one of the constraints limiting civil society’s ability to participate in critical procurement dialogues, tilting the balance of influence toward private corporations. In their view, such arrangements signal a prioritization of industry stakeholders over public interest groups and reinforce an ecosystem where private sector actors have greater access to decision-makers and procurement-related discussions than their civil society counterparts.

The second financial factor pertains to how civil society organizations are predominantly funded in Canada. Specifically, most civil society groups rely on government funding to sustain their operations. This financial dependence on government can create tensions for civil society organizations who advocate for policy changes or scrutinize government practices, including public procurement. To this end, CS1 questioned how activists can effectively engage in advocacy without risking disruptions to their funding, noting that any delays or reductions in financial

support can create uncertainty, limit the ability to carry out work, and potentially lead to staff losses.

Lastly, it merits noting that during my discussion with CS2 about challenges relating to government–civil society engagement, they put forward the IAP2 Spectrum of Public Participation as a reference point to articulate their view of the GoC's participation practices.¹⁰⁷ They informally assessed the extent to which GoC engagement aligns with the different levels of the Spectrum, identifying key areas where they believed participation remains limited. Pointing to the communication surrounding recent amendments to the *Privacy Act*, 1985 as an example of effective communication,¹⁰⁸ this individual averred that the GoC performs relatively well when it came to communicating with external stakeholders about procurement processes and policies (i.e., inform). By contrast, they felt the GoC was less effective when it came to obtaining public feedback (i.e., consult). As they put it, civil society activists often lack opportunities to participate as external stakeholders, which restricts meaningful dialogue and feedback.

Regarding the ‘Involve’ and ‘Collaborate’ levels of the Spectrum, CS2 asserted that the GoC’s efforts were inconsistent and frequently insufficient, criticizing what they maintained was the tendency to prioritize a small group of well-established organizations while leaving out a wider range of civil society perspectives. As for the granting stakeholder’s final decision-making authority (i.e., empower), CS2 stated this is rarely-if-ever achieved. As they saw it, the GoC’s alignment with the higher levels of the IAP2 Spectrum of Public Participation remain inadequate.

6.3 Conclusion

The findings presented in this chapter lend further empirical support to the proposition that

¹⁰⁷ CS2 was the only civil society key informant to mention the IAP2 Spectrum of Public Participation.

¹⁰⁸ CS2 was referring specifically to amendments to the *Privacy Act* that took place shortly before the time of the interview, notably those enacted in 2022, c. 9 (June 23, 2022), 2022, c. 10 (July 26, 2022), and 2022, c. 9 (October 1, 2022). See, <https://laws-lois.justice.gc.ca/eng/acts/p-21/>

participation in public procurement is multifaceted and spans several different types of engagement. The experiences of the civil society actors reported in this chapter illustrated two of the three distinct forms in which engagement in procurement activities is manifest; one which they shared with their private sector counterparts, albeit with different intentions, and one which their private sector counterparts in my research sample did not participate. The two forms of civil society engagement included: (i) passive observation¹⁰⁹ of procurement activities across the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms (and others) to review contracts and identify areas of concern in relation to transparency and/or accountability goals ; and (ii) indirect policy-level engagement involving public advocacy, raising awareness through media, and trying to influence norms and values around procurement practices. Two participants reported having taken part in government-led meetings or policy discussions relating to public procurement.

The experiences of the four civil society interviewees highlight the complex and context-dependent interplay between vision and voice within the GoC's procurement processes, particularly in relation to efforts aimed at shaping the broader procurement policy environment itself. In certain instances, the visibility of procurement information reportedly enables civil society actors to monitor government activities, engage more effectively in procurement discussions, and advocate for procedural reforms. Here, as for private sector actors too, there appeared to be a synergistic relationship between vision and voice, with the presence of clear, accessible, and complete information about contract award decisions and tender evaluation criteria enhancing the civil society's capacity to leverage that information strategically to gain access to

¹⁰⁹ While this form does not involve direct interaction with the procurement process, it represents a form of engagement insofar as it enables civil society actors to monitor contracts, identify areas of concern, and exercise oversight in relation to transparency and accountability objectives in a continuously ongoing manner.

policy discussions about procurement reform and to promote greater accountability in government contracting practices.

However, the civil society actors in my research sample, also reported a range of difficulties relating to information visibility, including complex user interfaces, inconsistent data structures, inefficient search functionalities, and disorganized presentation of procurement information. Along with the latter, insufficient information about contract details, particularly in relation to vendor identification and contract evaluation criteria, are reported as complicating their efforts at offering procurement oversight. This said, the availability of information does not necessarily translate into effective engagement, as civil society actors may lack the resources, capacity, or institutional access and knowledge to leverage the information to influence government decision-making in the procurement domain. This reflects a more complex dynamic where vision facilitates initial awareness and limited oversight, but the ability to exercise voice remains constrained by such factors as the lack of both resources and access to government decision-makers. In other words, civil society actors were able to obtain procurement information, but due to limited institutional resources and restricted access to government decision-makers, they were unable to translate visibility into substantive engagement. Consequently, while the information was accessible, it was not fully actionable.

It is here that communicative impediments, including such as obstacles as a lack of access to similar informal, unrecorded channels afforded corporate lobbyists and large private contractors can and do seemingly create barriers to civil society engagement in the macro, or policy-oriented, levels of the procurement process. There appear to be at least four critical aspects of the communicative impediments with which civil society actors must contend. First, are resource disparities and lobbying advantages that appear to favour established or well-resourced actors.

Second, engagement mechanisms are, at least by the civil society actors in my research sample, frequently experienced as procedurally inclusive but substantively constrained including perceived barriers with whistleblowing protections, appeals processes, and broader consultation efforts. These experiences may be illustrative of underlying tensions between formal opportunities for engagement and their perceived authenticity and impact. Third, in some instances—such as CS2’s account of challenges posed by large, unstructured datasets and the absence of interpretive tools—the volume and complexity of procurement information may create barriers to participation by hindering civil society actors’ ability to extract actionable insights, thereby discouraging meaningful engagement (i.e., undermining relationship between vision and voice). Fourth, civil society organizations in Canada tend to be heavily dependent on government funding. The reliance on government funding can influence their willingness to challenge public authorities lest they jeopardize their continued funding (Arvidson et al., 2018; Bloodgood & Tremblay-Boire, 2017).

What emerged from the perspectives of civil society key informants is a view of the GoC’s operationalization of transparency as being inconsistent in practice. To this end, these individuals maintained that they regularly encountered recurring barriers to accessing timely and relevant information (i.e., vision) despite the GoCs formal commitment to openness and transparency. These challenges, coupled with limited opportunities for substantive engagement (i.e., voice), left some questioning the extent to which transparency mechanisms are genuinely inclusive. As a result, their confidence in the GoC’s efforts appeared tempered, and doubts were raised about the depth of its commitment to transparency.

In the next chapter our attention turns to the perspectives of a small sample of government officials regarding the vision and voice challenges with which the GoC must contend in seeking to operationalize transparency within its public procurement activities.

Chapter 7: Vision and Voice – Government Perspectives

As the principal operators of Canada's public procurement systems, officials at all levels of the federal government occupy a central position in its administration. In this chapter, I present the perspectives of key informants from four GoC departments regarding the challenges encountered in seeking to operationalize transparency in federal procurement activities. The discussion is divided into three sections. The first presents the perspectives of seven (n=7) government officials from the four departments, with a focus on the visibility and accessibility of procurement information. The second section examines their views about stakeholder engagement (i.e., voice) in procurement processes. The third section offers an integrative reflection on the relationship between transparency and procurement, situating the findings within broader considerations of governance and institutional practice. The final section concludes the chapter by summarizing the key insights and their implications.

7.1 Vision-Oriented Perspectives of Government Actors

In the context of government procurement, ensuring the accessibility to and visibility of information is essential to enabling suppliers to access procurement opportunities and civil society actors to oversee the procurement activities. In this section, I present the perspectives of seven government officials from four departments with whom I met. My discussions with these individuals focused on the experiences of, and the challenges encountered by, their respective departments when engaging with civil society and private sector actors with a stake in the GoC's public procurement practices. The observations they shared revealed both anticipated institutional challenges and unexpected tensions in realizing procurement transparency objectives. As was the case with the private sector and civil society actors in my research sample, the participating government officials also identified what they viewed from their operational vantage point as

persistent systemic barriers, particularly in relation to meeting accessibility standards and ensuring procurement information can be easily located and used by different interested parties. The observations shared by these individuals offer a complementary lens through which to consider perceived constraints to the vision (i.e., visibility of information) and voice (i.e., engagement) elements of transparency reported by the private sector and civil society members of my research sample.

Each of my interviews with government officials (GOs) began with me asking about the challenges their departments faced regarding meeting accessibility standards in the context of the GoC's procurement activities. The responses reflected different understandings of 'accessibility.' Three interviewees zeroed in on accessibility in relation to government compliance with accessibility legislation (i.e., checkbox mentality), and three focused on matters of information findability. One addressed both dimensions, reflecting a more integrated view of accessibility and information findability. In terms of accessibility, GO1 began our discussion by emphasizing the challenges involved in meeting accessibility standards across the GoC's platforms, especially in relation to the requirements specified in the *Accessible Canada Act, 2019* and the role played by the Canadian Accessibility Standards Board in developing and promoting these standards nationally. In so doing, they pointed to the landmark *Jodhan v. Canada (Attorney General) et al.*, (2012) Federal Court of Canada decision that led to the imposing of a court-mandated deadline for the GoC to ensure full accessibility across all government websites.¹¹⁰ Referring to [Buyandsell.gc.ca](https://www.buyandsell.gc.ca) and *Proactive Disclosures – Contract Dataset*, GO1 noted that, as far as they

¹¹⁰ In its decision, the Federal Court of Canada determined that the federal government had breached Canada's *Human Rights Act*, 1985 by failing to provide accessible job application processes for people with disabilities. The Court ordered the government to enhance accessibility across all its websites and online services to ensure compliance with the law and to promote equitable access for all Canadians (*Jodhan v. Canada (Attorney General)*, 2012). See also, <https://www.acb.org/content/landmark-decision-victory-all-blind-canadians-donna-j-jodhan?>

were aware, there were no major accessibility issues with either platform. They were quick to clarify, however, that their observation about these two platforms did not necessarily reflect the overall accessibility status of all GoC's procurement websites. To this end, they pointed to discrepancies between the accessibility of public-facing platforms and internal government systems, adding that, in their opinion, the accessibility performance of the GoC websites and platforms was moderate relative to international standards.

Paralleling some of the claims advanced by GO1, GO2 attributed accessibility shortcomings on GoC platforms, in part, to the fact that different departments managed different procurement platforms, resulting in a decentralized governance structure lacking in consistent practices. GO3 likewise noted that within the GoC, decentralized decision-making introduces variability in the implementation of procurement policies and procedures. As they put it, despite enabling decisions to be tailored to local needs, the absence of centralized oversight often results in inconsistencies in service quality and policy enforcement across different departments, in part, because not all departments adhere to procurement guidelines with the same level of rigour. Some, they claimed, are prone to making localized adjustments and, in so doing, deviating from norms and creating discrepancies of practice across the system. GO3 further noted that the existing approach to decentralized decision-making approach leads to noticeable differences in stakeholder engagement practices across departments, resulting in unequal opportunities for stakeholder engagement in procurement-related processes, with certain groups being marginalized or excluded from key decisions.

This fragmentation, they added, results in varied and often inconsistent accessibility measures across procurement platforms. Without standardized protocols for ensuring accessibility compliance, staff must rely on self-directed learning, delaying the implementation of effective

strategies for making procurement-related documents and online content accessible to diverse users. This, GO3 argued, creates inefficiencies in relation to ensuring that tender notices, contract information, and related documentation are available in formats that meet recognized accessibility standards. GO2 further highlighted that issues relating to document formats and usability exacerbate these delays. These claims align with Monteiro and Correia (2023), Horton and Sloan (2015), and Easton's (2013) findings which indicated that decentralized approaches to accessibility governance within digital government systems frequently lead to discrepancies in accessibility standards, impeding efforts at creating cohesive digital environments.

The discrepancy between the accessibility of public-facing platforms and internal government systems can be attributed, in part, to regulations such as the Accessible Canada Regulations (SOR/2021-241), which mandate compliance with the Web Content Accessibility Guidelines (WCAG 2.0) for various public-facing materials, including websites and digital communications, to ensure accessibility for people with disabilities (Government of Canada, 2021). However, as noted by the Treasury Board of Canada Secretariat (2023), greater attention has been given to the accessibility of external platforms than to internal systems that often fail to meet comparable accessibility standards. This imbalance suggests that while external accessibility has been prioritized to meet public expectations and legal requirements, internal procurement workflows remain a secondary consideration.

Expounding on discrepancies in accessibility standards between the GoC's public-facing websites and internal government systems, GO1 suggested the continued use by public servants of a PeopleSoft database from the year 2000 exemplified an outdated internal system that limits the visibility of procurement information for internal users responsible for managing procurement processes but whose use persists. GO1 asserted that such gaps are particularly consequential not

least because this internal system plays a critical role in procurement decision-making, including vendor evaluations, contract approvals, and compliance monitoring. The lack of accessibility within this and other systems, they opined, hinders the ability of procurement officers to efficiently assess bids, track procurement outcomes, and ensure transparency across government procurement cycles. In their view, many such discrepancies are the product of factors such as a continued reliance on manual updating processes,¹¹¹ vendor lock-in, and the use of outdated technology that, together, impede efforts to achieve universal compliance with the *Accessible Canada Act, 2019*.

According to GO1 and GO2, inconsistencies in the implementing of standards across departments point to gaps between policy intentions and policy execution. Their shared view is corroborated by the Public Service Commission's (2021) Accessibility Review of Government Websites which identified systemic inconsistencies across the GoC as impeding the effectiveness of digital accessibility measures. Specifically, gaps in adherence to the TBS Standard on Web Accessibility along with challenges in: (i) staff training, particularly in relation to the understanding and application of accessibility requirements; and (ii) procurement processes that fail to consistently integrate accessibility criteria into tendering and contract management practices.

Further complicating matters, as per GO1, are two broader structural issues. First, according to this individual, accessibility implementation varies across departments depending

¹¹¹ Continued reliance on manual updating processes refers to manually inputting or adjusting procurement data, ensuring compliance with accessibility standards by reviewing each document or page individually, and updating records without automated reminders or batch updates. For example, if a procurement officer needs to update accessibility features for all new contract forms, they may be required to manually review and update each form individually, rather than using a system that automatically flags and corrects accessibility issues across multiple documents.

upon departmental priorities, budget allocations, and procurement governance.¹¹² While some departments have dedicated accessibility teams and funding, others rely on ad-hoc solutions with limited oversight. Additionally, competing policy priorities, such as cybersecurity and cost efficiency, reportedly often lead to accessibility being deprioritized in procurement decisions. The second factor is what they maintained was a propensity within the GoC to rely on tasking public servants with manually reviewing and updating web pages to ensure compliance rather than leveraging advanced automated tools.¹¹³ According to GO1, reliance on human instead of technological resources is exemplary of inefficiencies in how accessibility is managed across the GoC's various digital platforms.

These concerns are also reflected in the Treasury Board of Canada Secretariat's (2023) Guideline on Making Information Technology Usable by All, which notes that certain internal government-wide digital systems lack accessibility features, which impedes the seamless integration of procurement information and results in inconsistencies in the presentation and accessibility of procurement data.

Acknowledging that progress in improving public-facing websites was on-going, GO1 suggested that persistent challenges nonetheless remained, necessitating further enhancements to strengthen overall accessibility. They highlighted three key concerns in this regard.

1. A lack of accessibility expertise among procurement and IT professionals when acquiring software systems;
2. The absence of standardized tools and processes for assessing the accessibility of procured IT products; and

¹¹² Procurement governance refers to the frameworks, rules, and oversight mechanisms that guide how procurement activities are structured, managed, and monitored within a department or agency. This includes decision-making authority, accountability structures, internal controls, and procedures that ensure procurement aligns with legal, ethical, and policy standards. See, Yanuarisa et al., (2025).

¹¹³ It merits noting that automated accessibility tools primarily detect compliance with technical standards (e.g., WCAG 2.0) and may fail to capture usability issues relating to cognitive accessibility, keyboard navigation, and screen reader compatibility. See, Kumar et al. (2020); Parajuli and Eika (2020).

3. Challenges associated with maintaining accessibility standards, particularly in the context of customizing IT products such as Salesforce,¹¹⁴ ServiceNow,¹¹⁵ and Microsoft Dynamics,¹¹⁶ which are widely used across the GoC to manage customer interactions, IT services, and enterprise resources.

Commercial Off-The-Shelf (COTS) products offer the advantage of quicker implementation, enabling government departments and agencies to rapidly deploy services and tools (Guinness, 2022; Agrawal et al., 2016). However, GoC departments frequently require extensive customization of COTS solutions to align with their specific workflows, ensure alignment with unique regulatory frameworks and security protocols, integrate with existing systems, and/or introduce specialized features (Rikhi, 2022). Such modifications can create discrepancies in how accessibility standards are applied across procurement systems, leading to fragmented accessibility compliance.

Elaborating on the trade-off between deploying COTS solutions and undertaking extensive customization to meet the GoC-specific requirements, GO1 noted that although customization allows for tailored functionality, it also introduces complexities that affect the maintenance of accessibility standards and the overall management of the GoC's various platforms. More specifically, reliance on customized solutions often, in their view, resulted in inconsistent data formats and reporting structures, making it more difficult to ensure the vision element of procurement transparency across different platforms.

To this end, GO1 explained that despite the assertions of software vendors about their product's compliance with accessibility standards, such claims frequently lack independent

¹¹⁴ Salesforce is a cloud-based customer relationship management (CRM) platform used to streamline customer interactions and automate business processes. See, <https://www.salesforce.com>

¹¹⁵ ServiceNow is a cloud-based platform for IT service management (ITSM), business workflow automation, and operations support. See, <https://www.servicenow.com>

¹¹⁶ Microsoft Dynamics is a suite of enterprise applications, now offered as Dynamics 365, used for resource planning, customer service, and financial operations. See, <https://dynamics.microsoft.com>

verification. Many IT products, they claimed, are being marketed as accessible without having undergone the rigorous testing required to confirm compliance with the GoC accessibility standards. Paradoxically, according to this individual, newer systems tend to undergo more extensive scrutiny compared to older ones which, in turn, hinders the adopting of more accessible technologies. Echoing this concern, GO2 spoke of the recurrent challenge in ensuring vendor compliance with procurement standards and regulations. They observed that the lack of physical oversight often leads to vendors failing to meet required quality, security, and performance metrics. They emphasized that without effective digital monitoring mechanisms, it is difficult for the government to verify vendor adherence to its standards, thereby complicating efforts at ensuring compliance with accessibility obligations and broader federal procurement standards.

In commenting about accessibility, GO4 and GO6 offered some observations about what they perceived as recent improvements to the GoC platforms generally. GO4 pointed to enhancements in accessibility made by the TBS to the *Proactive Disclosures – Contract Dataset* platform, citing the introduction of screen reader compatibility and alternative text for images.¹¹⁷ GO6 did not offer any details but emphasized the GoC’s commitment to ongoing improvements, noting that a dedicated team of experts within TBS was working to implement targeted initiatives intended to streamline accessibility-related information and to enhance accessibility on TBS-managed digital platforms, thereby improving the overall user experience for individuals with disabilities.

Participants GO3, GO5, and GO7 offered no comments about accessibility in terms of legal

¹¹⁷ Screen reader compatibility refers to the design and coding of digital content in a manner that enables screen reader software to interpret and vocalize webpage information for users who are blind or visually impaired (Kumar et al., 2020; Parajuli & Eika, 2020). Alternative text (alt text) for images consists of textual descriptions of visual content, which are read aloud by screen readers to convey the meaning or purpose of images to users who cannot see them. See, Csontos and Heckl (2021) and Kumar et al., (2020).

compliance.

Regarding information findability, five (n=5) of the seven government key informants shared their thoughts with me. These discussions revolved around findability in relation to meeting stakeholder demands for timely,¹¹⁸ high-quality procurement information and the challenges the *Official Languages Act*, 1985 presents to meeting these demands. Citing the prolonged duration of different stages of the procurement process, GO1 explained that preparing RFPs, evaluating bids, and selecting contractors often takes considerable time. According to this individual, the extended timeline—from identifying procurement needs to implementing solutions—makes it difficult to meet stakeholder expectations for both timely information and the prompt handling of procurement-related concerns or questions. GO4 likewise observed that strict procedural requirements, while essential for fairness and compliance, can slow the release of procurement-related updates.¹¹⁹

Focusing on a somewhat different facet of the findability/time nexus, GO3 emphasized challenges associated with maintaining the relevance of procurement datasets over time. As noted by Soyulu et al. (2022), poor data quality hinders efficiency and erodes trust in procurement processes given that stakeholders rely on accurate and accessible information to make informed decisions. On the flipside, introducing rigorous validation and cleansing requirements contributes to delays in procurement information dissemination (Simperl et al. 2020). GO3 highlighted ongoing difficulties in ensuring the accuracy and usability of publicly available procurement information, noting that such limitations can affect stakeholders' ability to access meaningful and

¹¹⁸ In this context, timeliness refers to the ability of government departments who manage procurement activities to provide procurement-related information in a manner that aligns with stakeholders' decision-making needs and expectations.

¹¹⁹ The issues relayed here by GO1 and GO4 reflect an institutional trade-off where governance structures designed to ensure integrity may unintentionally limit the responsiveness of procurement systems. See, Mentta (2020) and Kafimbou (2019).

actionable insights. They also suggested that fulfilling high-volume or time-sensitive information requests—especially those requiring disaggregated data or complex cross-platform queries such as updates on tender status or contract awards—can place pressure on government resources and divert attention away from longer-term efforts to develop comprehensive data management systems that underpin effective procurement governance. According to GO3, the tension between meeting stakeholder demands for timely procurement information and managing the operational complexity of government-wide procurement systems underscores a broader challenge of balancing visibility with internal capacity constraints.

GO4 and GO7 identified external pressures as additional factors impacting the delivery of procurement information in a timely manner. They both spoke of the impact of the COVID-19 pandemic, noting that it necessitated strategic shifts in the GoC’s procurement priorities.¹²⁰ GO4, for instance, noted the GoC had to postpone key elements of its fourth OGP National Action Plan, 2018-2020, to reallocate resources toward pandemic response measures.¹²¹ GO7 viewed this adjustment as a pragmatic response, allowing the government to reallocate resources while still upholding key procurement transparency objectives, such as open data publication and contract disclosure. From these perspectives, the extension of the procurement reporting timeline was seen as evidence of institutional adaptability—enabling continuity in procurement accountability efforts despite external shocks.

Three government key informants – GO1, GO2, GO7 – expounded upon how challenges in adhering to the *Official Languages Act*—particularly the requirements outlined in the GoC’s

¹²⁰ This shift in priorities is documented in Government of Canada (2022).

¹²¹ Commitment 2 in the action plan had aimed at enhancing transparency in federal spending and procurement processes. Its Milestone 2.1 focused on improving the accessibility and comprehensibility of budget and spending information, and Milestone 2.3 committed the GoC to increasing access to procurement-related open data, including piloting the Open Contracting Data Standard (OCDS) across various contract records. See, Canada Treasury Board (2018).

Policy on Official Languages for Communications and Services¹²² — affect transparency in procurement. They each indicated that the integration of English/French bilingual capabilities during the early stages of system development had been viewed as critical to preventing costly retrofits and avoiding stakeholder exclusion,¹²³ and emphasized the considerable difficulties in ensuring procurement-related content, such as tender notices, contract award information, supplier guidance documents, and digital procurement interfaces (e.g., [Buyandsell.gc.ca](https://buyandsell.gc.ca)) along with all procurement-related reports, publications, websites, and digital services that interact with the public are simultaneously accessible in equal quality in both English and French.¹²⁴ In addition, they each stressed that language compliance challenges in procurement are not limited to content translation but extend to the architecture of digital services and organizational workflows.

GO1 also raised concerns about the difficulty procurement managers and executives face in maintaining English/French bilingual proficiency, which can affect internal communications relating to procurement planning, supplier engagement, and oversight processes. They further pointed to what they claimed was a misalignment between Official Languages obligations and industry practices, particularly where procurement tools or platforms sourced from external vendors are developed primarily in English and may not fully comply with federal language requirements.

GO7 echoed these challenges in relation to the development of English/French bilingual functionalities in procurement systems and the management of user feedback mechanisms. They observed that ensuring the timely and accurate translation of procurement content during the early

¹²² See, Policy on Official Languages for Communications and Services, <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=26160>

¹²³ These concerns echo findings from multilingual digital design literature, which highlights the importance of early-stage localization to avoid downstream accessibility barriers. See, Yang et al. (2023).

¹²⁴ GO1 and GO2 also underscored the difficulty of translating technical procurement documents, pointing to delays in public disclosure and resource strain.

stages of system development is difficult, especially when features are still being finalized. Two strategies were described as being explored to address these tensions: limited or invite-only testing of procurement platforms before broader deployment, and prioritization of translation resources toward critical procurement content. These strategies, they claimed, come with trade-offs and highlight ongoing difficulties in reconciling language obligations with the practical constraints of procurement system development. Yet, given that Canada has two official languages, meeting language obligations is essential to achieving the vision element of transparency, lest, as observed by GO1, in the absence of equal language access, perceptions of inequity and diminished trust increase.¹²⁵

GO1 also raised concerns about the resource-intensive nature of translating procurement documentation. Here, they discussed the tension between the need for prompt public disclosure of procurement data—such as contract summaries or award notices—and the time-consuming process of official translation. To mitigate these pressures, they proposed adopting a tiered approach, whereby to better balance transparency goals with workload and accuracy, procurement documents could be prioritized based on urgency or public relevance. GO2 supported this observation and emphasized the translation difficulties associated with technical procurement documents, such as detailed specifications or evaluation criteria, which often require specialized linguistic expertise. GO2 also noted that the government is exploring other solutions—such as AI-based translation tools—to accelerate the release of English/French bilingual procurement information while maintaining acceptable standards of quality.

Other participants responded to this line of inquiry with varying degrees of engagement/responses. GO3 and GO5 declined to comment directly on official language

¹²⁵ This concern echoes the view advanced by Grey and Severin (2022), who caution that asymmetrical access to information in both official language's risks undermining transparency and institutional legitimacy.

obligations. GO4 provided a brief reflection on general system design principles but did not address language compliance or translation practices specifically. GO6 offered a procedural account of procurement workflows, which was not directly relevant to the challenges discussed above.

7.1.1 Managing Online Platforms

All seven government participants were queried about the implications of data consistency, platform integration, and usability challenges manifest on the [Buyandsell.gc.ca](#), and the [Proactive Disclosures – Contract Dataset](#) platforms for both internal government users and external stakeholders. GO3 and GO4 declined to answer, and GO5 and GO7 shared comments that side-stepped the question. GO2 and GO6 offered perspectives about adjacent issues and did not elaborate on the complexities of managing procurement data. Only GO1 engaged with me about this subject matter. Hence, the discussion in this section largely reports on the views of this one individual.

In elaborating upon these challenges, GO1 provided several examples highlighting the operational and systemic issues involved in platform and data management. During our discussion, they emphasized that the lack of effective data harmonization strategies within the GoC often makes addressing inter-departmental data management discrepancies particularly challenging. In so doing, they gave the example of the complexities of data management across government-operated platforms, specifically noting differences between the [Buyandsell.gc.ca](#) and [Proactive Disclosures – Contract Dataset](#) platforms.¹²⁶ First among the complexities identified was that, despite the intention of having contract information and historical data across the two platforms being consistent, discrepancies persist. These inconsistencies complicate data management and

¹²⁶ The reader will recall that the [Buyandsell.gc.ca](#) platform, managed by PSPC, and the [Proactive Disclosures – Contract Dataset](#) platform by the TBS.

analysis for government operators who are responsible for maintaining the platforms, and for external users, such as civil society and private sector actors, who rely on the data for oversight, research, and procurement engagement purposes. According to GO1, these shortcomings can negatively affect the reliability of procurement data and hinder departmental efforts to comply with transparency requirements, including those mandated by the Directive on the Management of Procurement¹²⁷ and the Guide to the Proactive Publication of Contracts,¹²⁸ both of which require departments to maintain accessible, accurate, and consistent procurement information for the purposes of public and interdepartmental accountability.

Second, GO1 noted that the integration of new e-procurement systems—particularly those intended to replace or upgrade existing platforms such as *Buyandsell.gc.ca*—often lead to temporary disruptions and inefficiencies¹²⁹ in procurement operations during implementation. These challenges are largely due to difficulties in maintaining data continuity, ensuring system compatibility, and supporting users through the transition process. Here, GO1 explained that such disruptions stem from the complex task of aligning the diverse needs of various departments within a unified e-procurement platform. For example, a government department responsible for security-related contracts might require additional data encryption measures and restricted access for sensitive procurement records, whereas a department focused on public services might prioritize user-friendly interfaces and transparent reporting features. Such a misalignment in needs can lead to delays in the system's implementation, as tailored adjustments must be made to accommodate

¹²⁷ See, GoC, Directive on the Management of Procurement (May 13, 2021), <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32692>

¹²⁸ See, GoC, Guide to Proactive Publication of Contracts (June 30, 2023), Proactive Disclosure <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32763>. See also, <https://open.canada.ca/en/proactive-disclosure>

¹²⁹ In this context, examples of disruptions and inefficiencies include delays in data migration, temporary loss of access to procurement records, inconsistencies in system functionality during rollout phases, and the need for training or retraining internal staff responsible for using or managing the new system interfaces.

competing requirements.

Paraphrasing GO1, the varying operational workflows and requirements of different departments complicates the implementation of a cohesive system, leading to delays and operational challenges which, in turn, hinder information visibility for all stakeholders. These internal difficulties appear to undermine government operators' ability to maintain a unified data environment, resulting in fragmented information-sharing and slower decision-making processes. This situation may also extend outward, affecting external actors—namely civil society and private sector organizations—who depend on timely, consistent, and accessible procurement information for oversight, research, and market engagement, yet often face barriers stemming from inconsistencies in system functionality and data availability.

GO1 pointed to what they perceived as a technology knowledge gap among senior public officials that hinders informed decision-making in the procurement of ICTs.¹³⁰ In their view, this gap makes decision-makers susceptible to unsubstantiated marketing claims, potentially resulting in the selection and authorizing of technology solutions that are ill-suited to government operational needs. They went on to discuss challenges associated with ICT-based procurement — specifically, the use of digital tools in managing procurement processes—highlighting what they labelled as the lack of digital literacy of government staff. This shortcoming, they averred, impeded the ability of many government staff members to navigate online procurement platforms, accurately interpret procurement data, and complete tendering processes in a timely manner. For GO1, there was a very real need for continuous training and support to bridge this literacy gap and

¹³⁰ Suggesting there historically has been less emphasis on the need for technological expertise among senior public service executives compared to the knowledge levels expected in areas such as human resources, finance, and government policy, this individual maintained that the technology knowledge gap is particularly evident among deputy ministers, assistant deputy ministers (ADM), and director generals.

minimize inefficiencies and potential errors in procurement processes.¹³¹

In a related observation, GO1 pointed to the frequent turnover of key decision-makers, such as deputy and assistant deputy ministers, within the GoC as disruptive to strategic alignment and continuity in IT governance, complicating the consistent implementation of IT strategies. One consequence, he claimed, was a constraining of the ability of senior officials to fully address the long-term consequences of their technology decisions, potentially allowing issues to go unrecognized or unresolved and, thereby contributing to unforeseen challenges. GO1 illustrated this point using the example of the Phoenix pay modernization initiative.¹³² They emphasized that the Phoenix case underscores how procurement-related decisions—such as vendor selection, system customization, and contract management—can be adversely affected by inconsistent leadership, especially when institutional memory and strategic coherence are compromised.

To sum up, the perspectives shared by the key informants from the GoC suggest persistent tensions between transparency objectives and operational realities in implementing of visibility measures within both the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms, and broader GoC procurement processes. These individuals identified implementation gaps in accessibility standards, information findability, and data governance. They also highlighted variable adherence to accessibility requirements (e.g., WCAG standards) and challenges associated with maintaining English/French bilingual content in a timely manner. Their

¹³¹ Inakefe et al. (2023) and Mbatha (2022) identify inadequate digital skills among civil servants as substantial barriers to the successful implementation of e-governance initiatives and the effective use of procured ICTs, resulting in inefficiencies such as delays in bid evaluations, miscommunication across departments, and difficulties in navigating online procurement platforms, as well as inaccurate data entries and the inadvertent exclusion of suppliers during the tendering process.

¹³² The Phoenix project aimed to modernize the GoC's payroll system over the span of seven years. During this time, it encountered substantial challenges, including payment errors and delays for public servants, and was overseen by three different individuals who served as Deputy Minister at PSPC, the department responsible for the system's delivery. The Auditor General of Canada (2018) Office of the Auditor General of Canada (2017), found this discontinuity in leadership was a major contributing factor to the absence of effective oversight and accountability mechanisms for the project.

observations resonate with Michener and Bersch's (2013) and Ubaldi's (2013) emphasis on the need for structured, accessible, and comprehensible information as fundamental to visibility. At the same time, they underscore Meijer et al.'s (2012) argument that disclosure alone does not guarantee transparency unless information is usable and intelligible to relevant audiences.

More recently, Yanuarisa et al. (2025), Molodtsov and Nikiforova (2024), and OECD (2025) have all echoed and elaborated upon this perspective, emphasizing the centrality of data standardization, system integration, and user-oriented design in strengthening the functional visibility of procurement information. The key informants' descriptions of fragmented governance, inconsistent standards, and outdated systems suggest that the mechanisms necessary to realize visibility in practice—such as data interoperability, language parity, and continuity—remain fragile, thereby limiting the extent to which disclosure supports meaningful engagement and/or oversight.

7.2 Voice-Related Perspectives of Government Actors

One of the key challenges with stakeholder engagement in the GoC's procurement activities relate to the mechanisms through which stakeholder input is collected and incorporated into decision-making. In terms of transaction-oriented engagements, digital tools such as notification systems and online forms, are intended to facilitate interaction and feedback exchange between those bidding for or monitoring procurement contracts and the government departments seeking to procure products and/or services. Ideally, the procurement platforms should function as effective channels for this particular type of engagement, ensuring that diverse bids are solicited and meaningfully integrated into procurement processes.

In our discussion about the ways in which stakeholder input is collected and incorporated into transaction-oriented procurement-related decision-making, GO1 began by expressing

concerns about findability-related issues present with the GoC's contracting processes, which they described as particularly complex and resource-intensive. Some of the issues and challenges mentioned included navigating decentralized procurement sources, the lack of a centralized repository for contract opportunities, and the overwhelming volume of tenders, all of which hinder the ease with which relevant procurement opportunities can be located or retrieved.

According to this individual, existing arrangements implicitly benefit larger firms (e.g., Deloitte, IBM, and KPMG), which typically have more substantial resources and dedicated teams to navigate these challenges and are thereby able to submit more comprehensive and competitive bids and proposals than their smaller counterparts. With fewer resources at their disposal, smaller suppliers may find their ability to participate effectively in bidding processes constrained, even when they are well-positioned to deliver the required products or services. Paraphrasing GO1, this obviously raises concerns about the fairness of the procurement environment, particularly in relation to how procurement opportunities are communicated and disclosed through platforms such as Buyandsell.gc.ca and the [Proactive Disclosures – Contract Dataset](#), which, in turn, may reflect deeper challenges within the GoC's procurement system more broadly.

GO1, GO2, and GO3 identified persistent challenges in managing stakeholder input through digital feedback mechanisms embedded within the GoC's procurement platforms, particularly with regard to the accessibility, clarity, and responsiveness of contracting opportunities. These systems, which include tools allowing suppliers to submit questions, comments, or concerns during tendering processes, were described as limited in functionality and follow-up. According to these three interviewees, such limitations hinder the government's ability to support meaningful supplier engagement, particularly in terms of encouraging participation in bidding processes and addressing barriers faced by less-resourced vendors.

Drawing from their experiences in the federal public service, GO1 noted that various departments have developed sophisticated platforms—including *Buyandsell.gc.ca*, and the *Proactive Disclosures – Contract Dataset*—that incorporate centralized tools such as notification systems and online forms to collect and analyze user feedback in relation to procurement-related activities. Additional initiatives, such as ScaleUp,¹³³ the Digital Marketplace,¹³⁴ also serve to facilitate supplier engagement and improve feedback mechanisms across diverse procurement contexts. As per this individual, the core challenge in terms of engaging suppliers and other stakeholders in federal procurement lies not in the technical functionality of feedback tools themselves, but rather in finding ways to meaningfully integrate diverse inputs into procurement decision-making and operational practices. Echoing this view, GO3 also pointed out that despite technological advancements in federal procurement—such as the development of online supplier portals, automated tender notification systems, and digital feedback interfaces—difficulties in leveraging stakeholder feedback persist, particularly in integrating such input into procurement planning and implementation processes.

GO1 and GO3’s observations suggest that concerns persist regarding the extent to which departmental procurement platforms—and, more specifically, the feedback and engagement mechanisms embedded within them—can effectively incorporate stakeholder input into procurement planning and process improvement. These challenges are not solely technical. They

¹³³ ScaleUp is a Shared Services Canada initiative that promotes inclusive procurement by supporting small and micro businesses owned or led by underrepresented groups. It enables these businesses to participate in IT procurements via targeted departmental mechanisms. See, <https://www.canada.ca/en/shared-services/news/2023/09/government-of-canada-increases-the-diversity-of-suppliers-with-inclusive-procurement-initiative.html>

¹³⁴ The Digital Marketplace, launched in collaboration with TECHNATION (formerly ITAC), is a government-partnered platform that allows Canadian tech companies to register and showcase their capabilities, creating a centralized space for identifying potential suppliers and gathering input. See, <https://technationcanada.ca/en/digital-marketplace/>

also are procedural, depending on how such mechanisms are operationalized and whether stakeholder contributions are meaningfully integrated into institutional decision-making.

In addition to the observations offered by GO1 and GO3 about challenges associated with managing stakeholder inputs, GO2 touched upon issues relating to inclusion¹³⁵ in existing feedback and concern-reporting mechanisms (e.g., online enquiry forms available through Buyandsell.gc.ca, and department-specific contact portals). They noted that these mechanisms often prioritize meeting formal procedural requirements tied to legal and policy obligations, which may constrain the responsiveness of procurement units to broader stakeholder concerns that do not align with formally mandated priorities.

According to GO2, the emphasis on procedural adherence can inadvertently narrow the range of voices considered when assessing stakeholder input during procurement planning and tendering processes, thereby constraining the government's capacity to facilitate meaningful engagement, particularly in transactional interactions. They further added that this dynamic complicates efforts aimed at balancing regulatory obligations (e.g., such as accessibility standards, disclosure requirements) with a more inclusive and systematic approach to gathering and incorporating stakeholder feedback about barriers to participation, procedural ambiguities, and access-related challenges.

GO2 maintained that, in spite of recognition within the GoC of the need to address informal or less structured stakeholder concerns existing mechanisms remain constrained in their ability to do so effectively. As they saw it, strengthening opportunities for structured dialogue and broader inclusion across stakeholder groups by refining existing procurement feedback and reporting

¹³⁵ Inclusion in this context refers to the degree to which diverse vendors, particularly those with limited resources or from underrepresented groups, are able to access and effectively use institutional mechanisms for raising concerns or providing input into procurement processes.

mechanisms to better accommodate a wider range of stakeholder inputs—especially those relating to policy implementation gaps, procedural ambiguities, or access challenges—remains an ongoing challenge. To this end, the concerns expressed by this individual align with the findings of Kamols et al. (2021), Gregory (2017), and Foo et al. (2011), whose research all shows that compliance- and/or inclusion-driven frameworks that prioritize broad participation over substantive input may unintentionally weaken the depth of engagement.

7.3 The Transparency/Procurement Nexus

Toward the conclusion of each interview with the key informants from the GoC, I asked them the following questions:

How does the procurement process contribute to the government's vision of transparency? and

How has government participation in the Open Government Partnership (OGP) influenced the procurement process?

The rationale for my posing these questions was twofold. First, I wanted to probe the participants' views about how the GoC's procurement practices align with broader government efforts to enhance transparency, accountability, and stakeholder participation in decision-making.¹³⁶ Second, I wanted to ascertain how they perceived the GoC's focus on augmenting transparency in its operations writ large were impacting interaction(s) between vision and voice in the procurement domain.

Of the seven government key informants, GO2 and GO3 had the most to say about this

¹³⁶ Shortly after having completed my fieldwork, in late August 2024, the TBS released its Government of Canada Trust and Transparency Strategy. Structured around three strategic objectives, each with four commitments, the strategy is intended to serve as a “whole-of-government blueprint to strengthen public trust in federal institutions.” See, Treasury Board Secretariat, Government of Canada Trust and Transparency Strategy, (August 23, 2024). <https://www.canada.ca/en/government/system/government-wide-reporting-spending-operations/trust-transparency/government-canada-trust-and-transparency-strategy.html#toc0>. See also, OECD, Open Government Scan of Canada: Designing and implementing an open government strategy. (February 27, 2023). https://www.oecd.org/en/publications/open-government-scan-of-canada_1290a7ef-en/full-report/component-3.html#section-d1e124-0d7fc61da4

topic. The remaining five interviewees did not elaborate upon the government's transparency agenda or its open government commitments. The feedback I obtained in response to my two questions can be categorized as broadly encapsulating three issue areas, each of which is elaborated upon below.

7.3.1 Influence of the Open Government Partnership (OGP)

When asked about the impact of the GoC's engagement with the OGP, both GO2 and GO3 remarked that it had demonstrably influenced the GoC's approach toward transparency, especially in the area of procurement.

GO2 further added that, in their opinion, the period coinciding with the GoC's membership in the OGP has been characterized by a transition within the federal public service from mere adherence to basic compliance measures to a more systemic integration of transparency principles. As they saw it, increasing emphasis has been steadily placed on ensuring transparency in certain government operations,¹³⁷ including public procurement,¹³⁸ with demonstrable progress having been made in the visibility of government information over the past few years.¹³⁹

This said, both GO2 and GO3 pointed to the uneven pace of change in procurement practices despite their having been three procurement-specific commitments across three of

¹³⁷ Perhaps the most striking area in which specific transparency-centred efforts have been undertaken was the introduction of open government strategies into the Royal Canadian Royal Mounted Police (RCMP) under the auspices of Canada's OGP National Action Plan, 2022-2024. See Commitment 4 in, Government of Canada, National Action Plan on Open Government, 2022-2024, https://opencanada.blob.core.windows.net/opengovprod/resources/b17b6dab-febb-4bca-8328-2bd19220ee96/august-2023-updates-to-the-2022-24-national-action-plan-on-open-government_en.pdf?se=2025-04-17T18%3A02%3A08Z&sp=r&sv=2024-08-04&sr=b&sig=g7jOnRy1GawRHo3k/le91KLF6c4KkzoFNtDctypzaI8%3D

¹³⁸ Canada's fifth OGP National Action Plan (2022–2024) does not include any commitments related to public procurement, marking a departure from previous action plans in which procurement had been featured, albeit to varying degrees. See, <https://open.canada.ca/data/en/info/778989e3-f9a2-4a61-92dc-fdf0293cf6ca>

¹³⁹ Much of this information is available via the GoC's Open Government Portal. See, <https://search.open.canada.ca/data/>

Table 7.1 OGP Action Plan Commitments and Milestones Relating to Procurement Transparency (2014–2020)

Action Plan ¹⁴⁰	Commitment	Milestones
2014–2016	8: Open Contracting	<p>8.1. Release data on all contracts over \$10,000 via a centralized, machine-readable database available to the public.</p> <p>8.2. Increase the level of detail disclosed on government contracts over \$10,000.</p> <p>8.3. Provide guidance to federal departments and agencies to increase consistency in open contracting.</p> <p>8.4. Pilot the Open Contracting Data Standard, 0.3.3 on the Buyandsell.gc.ca website for federal contracts awarded by Public Works and Government Services Canada.</p>
2016–2018	9: Enhance Openness of Information on Government Spending and Procurement	<p>9.1. Release an interactive tool that will increase the granularity of data and information made available and enable Canadians to better understand federal departmental spending: Expand the types of data, graphics, and analytics available including: - Planned and actual results; - Comparisons between historical and planned spending; and - Spending on specific components such as salaries, capital, transfer payments, etc. Enable users to explore government spending of the most interest to them based on key data elements (e.g., target group, program type, priority area, etc.).</p> <p>9.2. Enhance online content pertaining to government finances on canada.ca to make information and tools on government spending readily accessible to Canadians.</p> <p>9.3. Provide targeted and timely material to make government accounting and financial reporting more consistent, transparent, and understandable to Canadians.</p> <p>9.4. Pilot updating the Buyandsell.gc.ca site to record the full details of contracts (in addition to awards), contract amendments, and the final termination of contracts.</p> <p>9.5. Participate in a case study to share best practices from Public Service and Procurement Canada’s pilot of the Open Contracting Data Standard on Buyandsell.gc.ca.</p>
2018–2020	2. Financial Transparency and accountability	<p>2.3 Ensure Canadians have access to open data on Government of Canada procurement: Pilot data that tests the implementation of the Open Contracting Data Standard (OCDS) is undertaken, which includes a cross-section of at least 300 contract records for a variety of contracts, including major projects. Pilot data will include all stages of the procurement cycle (planning, tender, award, contract, and implementation).</p> <p>2.4 Explore adoption of common contracting data standards across Canada</p>

¹⁴⁰ GoC, Canada's Action Plan on Open Government 2014-16, (October 23, 2015); GoC, Canada's Action Plan on Open Government 2014-16, (May 18, 2016), GoC, Canada's Action Plan on Open Government 2018-2020, (December 17, 2018).

Canada's five OGP national action plans to date (see Table 7.1). For them, the gap between clearly articulating policy ambitions and their implementation (i.e., implementation lags) was a source of concern. To this end, they both emphasized the need for what they viewed as technical improvements and institutional realignment to meaningfully embed transparency into the day-to-day operations of the public service.

Underscoring the importance, the GoC places on ensuring transparency efforts translate into tangible outcomes, GO2 stressed that the government views open government both as a means of promoting its policies and as a platform for communicating its achievements and the challenges with which it must contend. They described this shift as entailing a move away from merely releasing data to adopting a "purpose-driven transparency" model, where the aim is to both disclose information and strengthen accountability through deliberate engagement with stakeholders, including civil society and private sector actors. They suggested, however, that in spite of its efforts¹⁴¹ at engaging civil society and private-sector actors challenges persisted across many domains. In terms of procurement, they pointed to the differing information disclosure demands placed upon government by these actors. Namely, civil society actors frequently demand more detailed and accessible procurement information to uphold fairness and ethical standards, whereas private sector actors tend to seek information offering greater clarity and predictability in

¹⁴¹ Recent GoC efforts to engage stakeholders, including the public, civil society, and in some instances private-sector actors, include:

- The Multi-Stakeholder Forum on Open Government, which brings together government officials and civil society representatives to advise on open government priorities. See, <https://www.canada.ca/en/government/system/government-wide-reporting-spending-operations/trust-transparency/about-open-government/multi-stakeholder-forum-open-government.html>
- The Open Doors at Justice events, hosted annually by the Department of Justice to promote public engagement in transparency initiatives. See, <https://www.justice.gc.ca/eng/trans/open-ouvert/agenda.html>
- The RCMP's Open Government Strategy, which includes mechanisms for public input through comments on datasets published on the Open Government portal. See, <https://rcmp.ca/en/news/2023/05/rcmp-launches-its-open-government-strategy>

procurement policies.

In their comments, GO3 reinforced these observations, acknowledging the government's ongoing transparency efforts and noting that this evolution has brought new challenges, particularly in translating aspirational goals into measurable and effective reforms. GO3 stressed that addressing these types of gaps requires sustained dialogue between government, civil society actors, and private sectors actors. In so doing, they framed such engagement as being as essential for ensuring that policy efforts remain attuned to stakeholder expectations and for addressing specific challenges including, for example, those relating to legal compliance, beneficial ownership, and sensitive procurement involving law enforcement or security-related activities. Importantly, they also cautioned that dialogue alone is insufficient unless feedback mechanisms are in place to recalibrate implementation strategies in response to stakeholder input. Some of challenges identified included:¹⁴²

- inconsistencies in transparency efforts across departments, with variations in disclosure practices and engagement mechanisms creating challenges for external stakeholders attempting to access, interpret, and utilize procurement-related information and processes;
- concerns raised by civil society, including the transparency of selection criteria for civil society organizations chosen to participate in procurement transparency consultations or advisory panels, and the impact of public consultations;
- concerns raised by private-sector actors regarding the complexity and bureaucratic nature of procurement processes;
- sustaining effective dialogue between civil society actors, private sector actors, and government;
- lack of reliable metrics to assess progress and ensure robust monitoring and evaluation of transparency initiatives;¹⁴³

¹⁴² Edelmann and Francoli (2020) identify similar concerns, pointing out that the GoC's efforts at implementing its OGP action plan commitments often encounter limitations stemming from technical constraints, institutional resistance, and inadequate system integration. See also, Gladov et al. (2020), who point to structural barriers and resource constraints as key factors shaping reform outcomes.

¹⁴³ This shortcoming has been repeatedly identified in a wide range of research dealing with the implementation of open government and transparency initiatives in Canada and elsewhere. See, Paré (2024b; 2020), Zuiderwijk et al. (2019), Karanicolas (2018), and Francoli (2016; 2013).

- translating transparency principles into concrete, actionable plans, and reporting mechanisms.

First among the latter, according to this individual, is a need to improve stakeholder engagement. In terms of public procurement, they noted that in contrast to the increasing amounts of procurement-related information being made available, meaningful participation in the procurement decision-making process remains comparatively limited. GO3 further added that transparency should not be measured solely by the volume of data disclosed but also by how effectively stakeholders can engage with and influence procurement processes.

Despite the issues outlined above – especially the challenge of sustaining effective dialogue between civil society actors, private sector actors, and government – GO2 and GO3 both reported viewing OGP influence as being, overall, positive. It had, in their view, contributed directly and indirectly to the progress made by the GoC in embedding transparency into its policies, legislation, operational frameworks, and other ongoing improvements. They also emphasized the value of international benchmarking to ensuring continuous progress and accountability in the GoC’s transparency efforts.

7.3.2 Balancing Data Security with Privacy

Balancing data security with privacy within procurement processes presents a multidimensional challenge for the GoC. This tension is particularly acute in digital procurement environments, including platforms such as [Buyandsell.gc.ca](https://buyandsell.gc.ca) and the [Proactive Disclosures – Contract Dataset](#), where sensitive commercial, financial, and personal data converge, thereby intensifying the demand for both regulatory compliance and procedural adaptability. In the public sector, this balance must be achieved within institutional frameworks that prioritize the protection of sensitive information while also accommodating the operational demands of timely procurement information, especially as procurement systems increasingly manage larger and larger volumes of

data (Islam & Karlsson, 2022).

In our discussion, GO3 highlighted the dual necessity of implementing stringent security measures, such as encryption and advanced access controls, to protect confidential data within procurement systems. Echoing Goyal et al. (2023), they noted that such tools are essential for safeguarding sensitive information from unauthorized access and cyber threats.

The deployment of security technologies may reflect established best practices but their integration into procurement operations simultaneously introduces trade-offs between maintaining system integrity and enabling real-time access by multiple institutional actors. As per GO3, the core challenge rests in embedding such security measures in ways that do not impede operational efficiency. Put simply, when security protocols become overly restrictive, they can obstruct timely access to critical information, delay decision-making, and diminish process agility.¹⁴⁴

In our discussion, GO4 also shared their thoughts about procedural tensions that arise when striving for transparency under rigorous privacy and data protection frameworks. This individual noted that although the GoC aims to enhance openness in procurement, it must also comply with evolving privacy standards and implement advanced digital safeguards that implicitly and explicitly place boundaries on openness. This dual mandate illustrates broader tensions in balancing transparency and privacy, particularly under open government commitments where the release of personal or commercially sensitive data must be carefully managed to support transparency without compromising individual or organizational rights.

7.3.3 Reconciling Transparency with Sensitivity

Tensions between transparency, national security, and contractual obligations were raised by GO2 who emphasized the complexity of navigating this balance, particularly within procurement

¹⁴⁴ See, Gaie and Mehta (2024).

contexts where disclosing certain information can inadvertently expose sensitive details to misuse and/or exploitation.¹⁴⁵ Paraphrasing this individual, managing such risks is essential to ensuring that transparency efforts do not compromise security imperatives or violate contractual agreements.

GO2 further stressed that, even when full disclosure is constrained by legitimate security or contractual considerations, government institutions should clearly articulate the rationale behind withholding information. This, they argued, helps foster openness and encourages constructive dialogue by demonstrating institutional responsiveness rather than secrecy. They highlighted the importance of timely responses to stakeholder inquiries, noting that delays or unaddressed questions can lead to misinterpretations and misinformation. GO2 underscored that a proactive, transparent approach to communication is crucial for maintaining public trust and ensuring the effectiveness of transparency initiatives.

GO2's concern that lack of explanation can lead to perceptions of institutional opacity is echoed in recent recommendations of the National Security Transparency Advisory Group (NS-TAG),¹⁴⁶ who stress the importance of transparency as a key pillar of public trust—even in domains historically shrouded in secrecy. GO2's position also aligns with the claims of Francoli (2024), who argues that transparency and dialogue are not mutually exclusive in national security settings. Drawing on the Canadian experience, she challenges the “false trade-off” between secrecy and openness and calls for a cultural shift that recognizes the public's capacity to engage meaningfully

¹⁴⁵ Drawing on their experience in federal security procurement, GO2 highlighted the complexities of maintaining transparency and accountability while navigating legal and national security obligations.

¹⁴⁶ The National Security Transparency Advisory Group (NS-TAG), established in 2019 by Public Safety Canada, is an external advisory body mandated to guide the implementation of the GoC 's National Security Transparency Commitment across national security and intelligence institutions. See, <https://www.canada.ca/en/services/defence/nationalsecurity/national-security-transparency-commitment/national-security-transparency-advisory-group.html>

in discussions, even when some information must remain protected.

GO2's perspective emphasized that managing transparency in sensitive domains involves legal and procedural compliance as well as a sustained effort to engage stakeholders through clear and anticipatory dialogue. In the context of GoC's procurement process, unresolved tensions between transparency, national security, and contractual obligations can constrain both the visibility of procurement information and the openness of engagement processes, thereby affecting how stakeholders access, interpret, and respond to available data.

7.4. Conclusion

The findings presented in this chapter lend additional empirical support to the proposition that participation in public procurement is multifaceted and spans several different types of engagement. It became apparent during my discussions with the participant government key informants that their understanding of participation in procurement extended beyond formal stakeholder interactions to include internal practices through which public servants themselves engage with procurement data and systems.

At one level, their contributions seemed to forefront a transaction-oriented view of participation, involving suppliers submitting bids on tenders. On another level, especially with regard to OGP activities, their perspectives pointed to consultative forms of engagement, where external stakeholders are at least nominally involved in discussions around procurement policy and system reform. However, these interviewees did not indicate that such engagements are consistently applied across departments or agencies, and their reach appears to vary by context. On a third level, the interviewees also expounded upon a type of internal engagement that pertains to how public officials interact with procurement data and digital platforms to identify challenges, support decision-making, and improve system performance. This type of internal engagement is

not typically described as participation nor recognized as voice in discussions of transparency. However, it appears to merit closer attention insofar as it does seemingly play a key role in shaping *how* public procurement systems function and respond to information demands from private sector and civil society actors.

The key informants from government in my sample identified several structural and operational barriers (e.g., accessibility limitations, procurement delays, inconsistencies in bilingual implementation) that inhibit stakeholders' ability to locate, interpret, and make use of procurement information effectively. Decentralized governance, inconsistent IT governance practices across departments, outdated digital systems, and the challenge of balancing legal compliance with practical visibility were also identified as factors constraining efforts to enact vision-related transparency objectives within certain GoC departments. Delays and data quality issues were identified as further complicating efforts to ensure timely and accurate information disclosure. The government interviewees also highlighted the complex trade-offs involved in reconciling transparency with other priorities, including privacy, security, and contractual obligations.

Together, the unresolved tensions between transparency goals and the realities of infrastructure implementation appear to negatively impact platforms such as [Buyandsell.gc.ca](https://buyandsell.gc.ca) and the *Proactive Disclosures – Contract Dataset* in terms of fully realizing procurement transparency. Digital tools were acknowledged as facilitating transaction-oriented participation, but concerns were raised about their ability to elicit and incorporate substantive input from diverse stakeholder groups. Accessibility requirements, content maintenance, and the meeting of English/French language standards do not appear to consistently be upheld, especially in decentralized or resource-limited contexts. Moreover, procedural compliance with frameworks such as the *Accessible*

Canada Act, 2019 and the *Official Languages Act, 1985* sometimes lead to delaying the availability of procurement data and/or constrains how it is presented.

In terms of stakeholder voice, the government participants described a varied and often fragmented landscape of engagement. They highlighted several persistent tensions in how stakeholder voice is operationalized within principal procurement platforms such as *Buyandsell.gc.ca*, and the *Proactive Disclosures – Contract Dataset*, as well as within broader GoC procurement processes. While digital platforms were recognized as expanding transaction-oriented participation opportunities, concerns were raised about their capacity to capture and respond to meaningfully to inputs received. The interviewees described constraints across three principal forms of engagement—transactional, consultative, and internal—each shaped by different institutional logics and procedural frameworks.

Rigid adherence to regulatory criteria was seen to narrow the types of feedback that can be formally considered in different contexts, limiting the potential for adaptive or responsive system development. Institutional instability and uneven digital capacities were also identified by those in my research sample as persistent barriers to coherent and sustained implementation of both vision and voice elements of transparency goals.

What emerged from government interviewees' accounts is that while the intent to promote transparency—both in terms of vision and voice—present and acknowledged, the perceived effectiveness of its operationalization has been uneven and constrained. According to their perspectives, the limitations responsible for this state of affairs were not rooted in resistance to openness or transparency, but rather, stemmed from enduring challenges such as structural barriers and legacy technologies. From the vantage point of those tasked with implementing transparency,

these conditions have complicated efforts to realize transparency commitments consistently and to enable inclusive forms of participation.

In the next and final chapter, I integrate the empirical findings and theoretical insights developed up to now, to address the research questions that have guided this dissertation.

Chapter 8: Conclusion

This dissertation examined how transparency is operationalized in the GoC's procurement activities, focusing on information visibility (i.e., vision) and stakeholder engagement (i.e., voice), as conceptualized by Meijer et al. (2012). Much of the existing literature about public procurement argues that transparency is expected to reduce corruption, improve efficiency, and foster public trust. However, realizing these benefits in practice is often constrained by institutional complexity, technical limitations, and uneven. In seeking to investigate how transparency is operationalized in federal procurement, particularly in terms of the visibility of information and the engagement of stakeholders, I used a multi-methods qualitative approach to assess both the manner and extent to which vision and voice were manifest across the two main public procurement platforms managed by the GoC: *Buyandsell.gc.ca* and the *Proactive Disclosures – Contract Dataset*. My research design involved dividing my research into a desk-based phase that evaluated the accessibility, usability, and quality of procurement-related information on these platforms and a key informant interview phase that sought to examine how platform limitations hinder stakeholder access to and engagement with federal procurement processes, and how the GoC navigates diverse and evolving transparency expectations.

The findings of the desk-based phase identified broad limitations accessibility, usability, and content quality across both platforms with the potential to negatively affect stakeholders' ability to access timely and relevant procurement-related information. The findings of the second, key informant interview, phase showed that the private sector, civil society, and government actors within my research sample had to contend with structural and operational barriers that limited both the vision and voice elements of transparency in the Canadian public procurement context. Despite the size of the research sample, the reported findings are noteworthy because nonetheless point to

a limitation within Meijer et al.'s (2012) framework. Specifically, the need to refine how the voice (i.e., engagement) is conceptualized within this framework to better reflect the multifaceted and uneven nature of stakeholder engagement in procurement activities.

Chapter 2 traced the evolution of the concept of transparency, outlining some of the complementary conceptual overlaps between transparency and open government as well as setting out connections between transparency and stakeholder engagement in public procurement. Chapter 3 introduced Meijer et al.'s (2012) vision and voice framework as the conceptual lens informing the data collection and analysis portions of the project. Chapters 4 through 7 presented the empirical findings emerging from the desk-based and key informant interview phases of the project. Chapter 4 detailed the research design and methodology used for the dissertation. It also presented the findings emerging from my assessment of information accessibility, usability, and content quality at the GoC's *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* procurement platforms. The discussion in Chapter 5 outlined the research techniques used in the second, key informant interview, and presented the perspectives of the private sector key informants who participated in this investigation. . Chapters 6 and 7 focus on the perspectives of civil society and government actors, respectively. In Chapter 6, I presented the perspectives shared by the civil society key informants and reflected upon the implications of their observations in relation to how the GoC operationalizes transparency in the procurement context. Chapter 7 followed the same structure as Chapter 6 but with a focus on the views of officials from the federal government.

This concluding chapter is organized into five sections. The next section advances responses to the central research question and sub-questions on the basis of the research findings. The discussion in the second section presents the key contributions of the dissertation to the advancing of knowledge. The limitations of the research are discussed in Section 3. In the fourth

section I propose directions for future research flowing from findings of this dissertation. The final section concludes discussion by offering a few closing observations about the dissertation's broader implications about the complexity of operationalizing transparency both in procurement and other contexts.

8.1 Re-examination of the Research Question(s)

This dissertation was guided by the observation that the GoC consistently presents itself as a strong proponent of transparency, as evidenced by its participation in international initiatives such as the OGP and the various transparency-oriented commitments it has sought to implement across more than five OGP national action plans. Such public affirmations aim to foster a policy environment in which transparency is prioritized and institutionally embedded, at least at the level of discourse. My interest in transparency and public procurement was motivated by a sense that while official narratives championing transparency and the implementation of OGP national action plans may contribute to incremental improvements—particularly in terms of standardizing and publishing procurement data—persistent barriers likely remained, constraining stakeholders' ability to access usable information and participate meaningfully in micro- and macro-level procurement activities. My hypothesis was anchored in three assumptions:

1. Transparency, as promoted by the federal government, is both a normative aspiration and an operational goal, was expected to be reflected in the provision of procurement information in accessible and usable formats, as well as in the formalization of mechanisms that enable meaningful stakeholder participation.
2. The digitalization of public procurement processes does not in itself equate to transparency.
3. Stakeholder 'engagement' in all facets of public procurement entails not just having access to relevant information. It also is contingent upon having in place for meaningful consultation,

opportunities for stakeholder-government dialogue, and responsiveness on the part of the government.

The findings of this study appear to support this hypothesis, suggesting the presence of a host of institutional complexities and systemic barriers hinder the full realization of transparency in the Canadian public procurement context.

8.1.1 Accessibility and Availability of Procurement Information

The first sub-question asked about how, and the extent to which, public procurement information is made accessible and available to stakeholders. The findings suggest that despite stakeholder expectations that GoC be readily accessible – especially in relation to the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms –accessibility to, and availability, of procurement information are shaped by a combination of institutional, procedural, technical, factors that complicate fulfilling such expectations.

Here, the two private sector key informants described challenges relating to platform usability, particularly in navigating these and other procurement portals and in locating relevant opportunities. These individuals suggested that smaller suppliers were most likely to be disadvantaged by complex registration procedures, search filters that returned overly broad or irrelevant results, and a lack of intuitive interface design. Further, they maintained that opacity at both the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms exacerbate informational asymmetries, making it more difficult for less-resourced suppliers to compete for contracts.

The civil society key informants similarly highlighted difficulties in accessing procurement information via *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* in formats conducive to monitoring, evaluating, and/or conducting policy-relevant analysis. Those with

whom I spoke relayed instances of data being outdated, inconsistently structured, and/or insufficiently detailed to be meaningful for external scrutiny.

The participating government key informants recognized many of the concerns raised by their non-government counterparts. Some associated the identified challenges with the incremental way procurement information systems evolve, pointing to siloed system updates that do not always prioritize user accessibility. At issue here are obstacles arising from the presence of legacy systems, resource limitations, and competing operational priorities that hinder on-going efforts to consolidate the GoC's public procurement platforms and improve interface design. In some instance, decisions about data publication are also influenced by security concerns and contractual confidentiality clauses, which further constrains what information is made available.

In practice, information accessibility extends beyond the technical availability of information to encompass the extent to which stakeholders can effectively navigate, understand, and meaningfully use the information provided. Collectively, the findings relating to the vision (i.e., information visibility) component of transparency suggest that in spite of the substantial volume of procurement information that is publicly disclosed, barriers remain when it comes to information discoverability, usability, and interpretability. This gap between formal transparency and practical accessibility underscores the importance of viewing information disclosure as a relational and context-sensitive process—one that depends on how systems are designed, maintained, and experienced by users with diverse needs and capacities. In turn, this vision-centred observation has direct implications for the voice (i.e., engagement) aspect of transparency. Specifically, when procurement information is difficult to locate, interpret, or trust, the conditions for meaningful stakeholder engagement are also likely to be constrained.

8.1.2 Stakeholder Participation in the Procurement Process

The second sub-question inquired about the ways and extent to which stakeholders participated in the GoC's public procurement processes. In pursuing this question, the aim was to examine how private sector and civil society actors experienced engagement in the government's procurement environment and how well current practices aligned with the GoC's broader transparency goals.

Stakeholder engagement is widely regarded as a core feature of democratic governance and a normative foundation for institutional responsiveness. In the context of public procurement, engagement encompasses a range of practices through which stakeholders attempt to monitor, influence, and contribute to procurement decision-making. To this end, open government initiatives and reforms often seemingly take for granted that digital platforms and open data initiatives *ipso facto* foster more inclusive, dialogic forms of interaction, enabling stakeholders to contribute meaningfully to procurement oversight and design (OECD, 2023c; Edelman & Francoli, 2020; OGP, 2020; Evans & Campos, 2013).

The perspectives shared by the key informants who participated in my study suggest several limitations to the participatory dimension of procurement transparency are manifest in the Canadian context. The two private sector key informants, for example, underscored structural and technical barriers to their – and they suggested others – engagement, citing difficulties in navigating the [Buyandsell.gc.ca](https://buyandsell.gc.ca) and [Proactive Disclosures – Contract Dataset](#) platforms arising from what they claimed were unintuitive design features and limited feedback mechanisms. They claimed to be hardly the only ones negatively affected by these obstacles, stating that smaller firms were acutely affected in terms of having to contend with a reduced ability to respond to tenders, to participate in consultations, and to contribute to procurement-related policy discussions. Broadly paralleling these assertions, the civil society key informants characterized the notion of

engagement in the procurement domain as being largely symbolic.¹⁴⁷ All four expressed concerns about limited opportunities to contribute meaningfully to procurement frameworks or monitoring practices, citing consultation processes that were either inaccessible, insufficiently advertised, or structured in ways that limited substantive input.

The government key informants acknowledged these concerns as having merit and explained them as resulting from resource and technological constraints. Two participants referred to administrative priorities or internal accountability requirements as being responsible for curtailing broader stakeholder engagement, particularly during early stages of procurement planning. Three participants also noted that efforts to streamline procurement procedures and enhance efficiency may unintentionally deprioritize stakeholder input or limit iterative feedback mechanisms.

Taken together, these perspectives suggest a misalignment between the participatory ideals embedded in the GoC's transparency narratives and the practical realities of its operationalization in the public procurement domain. Engagement, as described by those comprising my research sample, is not uniformly accessible nor consistently integrated into the procurement environment, with opportunities for engaging reportedly being fragmented, conditional, and/or shaped by institutional routines possibly prioritize control and procedural expediency over inclusiveness and responsiveness. Moreover, the reported barriers to engagement were both explicit and structurally embedded. Beyond the absence of formal consultation mechanisms, participants described subtle impediments such as how feedback is solicited, the language used in outreach efforts, and implicit assumptions about who qualifies as a relevant or legitimate stakeholder.

¹⁴⁷ It merits recalling that one potential civil society participant declined to participate in my study on these grounds, claiming that the GoC's transparency actions in the procurement domain had not yet progressed to a point which supports meaningful civil society engagement.

The observing of such dynamics serve to reinforce the idea that when understood as a relational and procedural phenomenon, transparency entails much more than simply making information available. Specifically, requires putting in place mechanisms designed to enable and support the incorporating of external perspectives into government decision-making. This said, and as emphasized by all the key informants in my research sample, it must be borne in mind that engagement in procurement activities in various guises emerges as an evolving process; one shaped by institutional logics, technological affordances, and changing relationships between public authorities and external actors. The extent to which procurement systems foster such engagement ultimately influences whether transparency operates as a substantive democratic practice or a procedural formality.

8.1.3 The Operationalization of Transparency in Government Procurement: Integrating Visibility and Engagement

The central research question guiding this dissertation was:

How are vision and voice manifest in GoC procurement activities that occur via its two main procurement platforms?

To address this question, I examined how transparency is practiced and experienced in the context of the [Buyandsell.gc.ca](https://buyandsell.gc.ca) and [Proactive Disclosures – Contract Dataset](#) platforms. Grounded in the conceptualization of transparency as encompassing the visibility of procurement information and the engagement of stakeholders in both transaction- and non-transaction centred procurement activities, I investigated how these elements are operationalized through the GoC’s digital infrastructures, administrative procedures, and institutional practices.

The findings from my investigation suggest that despite the GoC having made concerted efforts to increase the visibility of procurement information throughout the past decade, the accessibility, completeness, and usability of the information remains uneven. Digital platforms and proactive

disclosure mechanisms have expanded information availability, yet the key informants with whom I spoke frequently described difficulties in locating, interpreting, and contextualizing this information. When I first got my dissertation under way, I had anticipated that greater disclosure of information would necessarily be associated with increased capacity for stakeholder oversight. However, the observations shared by the key informants suggest the mere presence of information does not guarantee its accessibility or usability. Fragmented information sources, limited contextual cues, and technical barriers disproportionately affect civil society actors and small suppliers. Such disparities highlight an underlying shortcoming in translating information visibility into meaningful information access, let alone voice (i.e., engagement).

The key informants' observations also suggested unevenness in the participatory dimension of transparency (i.e., voice) is manifest in GoC procurement activities. Formal consultation processes exist in the Canadian public procurement environment. However, the individuals comprising my research sample reported viewing them as sporadic, inconsistently publicized, and narrowly defined. Some participants described engagement opportunities as prescriptive and largely procedural, offering limited scope for iterative or responsive interaction. I was particularly struck by how opportunities for engagement in the GoC's procurement processes—though referenced in only three accounts—were perceived to hinge on familiarity with institutional procedures and access to internal networks.

The perspectives shared by the key informants all pointed to the idea that transparency is not a fixed or uniform condition. Their views suggest it emerges in the public procurement domain as a dynamic, negotiated practice, shaped by the interplay of administrative and technological constraints, policy intentions, and professional judgments. Moreover, in the context of the GoC's operations, these competing imperatives are not always reconciled through standardized

operational guidance which, in turn, results in divergent practices across departments.

A further insight that emerged from my discussion with the key informants pertains to the role interpretive judgment may play in how transparency operationalized by the GoC in the public procurement domain. Decisions about which information to make available, how to design feedback mechanisms, and how to respond to stakeholder inputs all appear to be conditioned by the interplay between formal rules and procedures on the one hand, and the discretionary choices of public servants on the other hand. This suggests that transparency may be as much a matter of internal organizational practices and professional interpretations as of formal policy and system design.

Taken together, my findings suggest that the manner in which vision and voice are manifest in GoC procurement activities that occur via the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms is constantly evolving and being shaped by variables of institutional design, digital infrastructures, and stakeholder capacities. In this context, transparency, as operationalized and experienced emerges through the interplay of structures, resources, and interpretive practices that condition how stakeholders access information and how they engage in procurement activities.

8.2 Key Contributions and Implications

The findings of this dissertation contribute to the advancement of knowledge both in terms of theory and practice. At the level of theory, perhaps its most important contribution rest in its empirical identification of a need to expand, in the public procurement domain at least, Meijer et al.'s (2012) vision and voice framework to more accurately account for the finding that, participation and engagement in this context is manifest through multiple modalities corresponding to the distinct institutional roles, operational priorities, and normative commitments of different

actors. The perspectives shared by the key informants comprising my research sample suggest that engagement in procurement processes is largely shaped by stakeholders' positions within the procurement context – whether as those posting tenders, as suppliers, as those providing technical and other support services, or observers – each of which is grounded in complementary though distinct institutional logics. For some actors, engagement centred on procedural compliance and contractual navigation, for others, it involved monitoring, advocacy, or internal reflection. Such differences do not appear to be mere variations in emphasis but instead seemingly reflect fundamentally different ways of relating to, and participating in, the procurement system.

Put simply, voice is not monolithic. It is highly fluid and varies in accord actors and contexts. To this end, the findings of this dissertation suggest the need for adopting a more nuanced understanding of voice; one that recognizes how actors participate in the various facets of public procurement is contingent upon their objectives, institutional mandates, and interpretations of engagement. In the context of my dissertation, three distinct forms of engagement were identified: transactional engagement, consultative engagement, and a type of engagement that was internal government involving how public officials interact with procurement information and digital systems to inform their decision-making and procurement practices. Taken together, these findings suggest that, augmenting the analytical value of 'voice' as a conceptual lens for investigating transparency requires, among other things, distinguishing between policy and non-policy-oriented contexts in which voice is exercised. In the case of public procurement context this entails recognising that exercising voice in the context of transacting differs notably, for example, from exercising voice in the context of policy-centred discussions. Yet, both contexts have implications for how transparency is understood and operationalized. Relatedly, the observations emerging from my research also suggest a need for extending Meijer et al.'s (2012) contention that the

relationship between vision and voice tends to take one of three forms: synergistic, complementary, or undermining. Ingrams et al. (2020) and Schnell (2020), have each already suggested that the latter typology does not stand up to empirical scrutiny, especially within specialized institutional contexts such as public procurement. Going into this project, and being familiar with the two latter studies, I had anticipated the interplay between information visibility and stakeholder engagement would exhibit greater complexity and contextual variation than suggested by Meijer et al.'s (2012) typology. Specifically, I hypothesized that the relationship between vision and voice would vary depending on how different stakeholders access, interpret, and act upon procurement information within their institutional roles and operational environments.

Although the size of my research sample precludes generalizing the findings of this dissertation, my findings appear to support, at least partially, for my hypothesis. For the private sector actors in my sample, enhanced visibility of procurement information facilitate engagement in the form of identifying bidding opportunities and monitoring award outcomes. This suggests the presence of a temporary synergistic interaction between vision and voice. However, the perspectives shared by these individuals indicated this relationship was, in fact, conditional insofar as challenges relating to platform usability and information quality – whether the *Buyandsell.gc.ca*, *Proactive Disclosures – Contract Dataset*, or some other platform – limited the sustainability of this engagement.

The perspectives shared by the civil society key informants pointed toward a similar, though more limited, pattern. Three civil society participant(s) reported leveraging visible information to engage in oversight and advocacy, indicating synergy between vision and voice. Yet, such instances were rare which, in turn, suggests that increased visibility alone is insufficient

to support the meaningful exercise of voice. Indeed, three of the four civil society participants reported feeling discouraged from engaging in procurement oversight given the overwhelming volume and complexity of procurement data, and the absence of interpretive tools. The accounts provided by the government key informants further suggested that the GoC's transparency efforts were shaped by systemic constraints, including outdated technological infrastructure, fragmented governance structures, and compliance-related limitations which, together, tended to restrict their capacity to provide and make effective use of procurement information.

Taken together, these observations suggest Meijer et al.'s (2012) typology may be better understood as empirical tendencies whose manifestation is contingent upon context, rather than as mutually exclusive or stable categories. It also makes clear that transparency is a function of much more than simply information disclosure. In the public procurement context, transparency is it is shaped by the ways in which different stakeholders— private sector, civil society organizations, and government officials—perceive and navigate myriad procurement practices.

In terms of practice, the findings that have emerged in relation to the challenges (e.g., information accessibility, usability, content quality, institutional constraints hindering meaningful consultation and feedback) with which private sector, civil society, and government actors must contend point to the need for continued policy and administrative changes, especially when it comes to improving the tools and processes that help to make public procurement more transparent. The inclusion of perspectives across stakeholder groups underscores the need for reform initiatives that are responsive to diverse informational needs and organizational settings. These findings are especially pertinent in the context of digital government initiatives, where transparency mechanisms must support both stakeholder engagement and flexible internal practices.

8.3 Limitations of the Study

This dissertation aimed to develop a better more nuanced understanding of how transparency is manifest in the Canadian public procurement context by focusing on the GoC's two main procure platforms. Evidence to address the guiding research questions was gathered in two phases. The first involved conducting a desk-based analysis of the GoC's *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms focusing on their structural design and informational functionalities. The second phase involved conducting 13 key informant interviews aimed at uncovering stakeholder experiences and perceptions regarding platform visibility and barriers to engagement within procurement activities. As with any large research project, there are some limitations that come to light during the course of conducting the research; some of which can be addressed in the moment and some of which are beyond the researcher's control.

One notable limitation with this dissertation rests in its exclusive focus on the federal level of public procurement in relation to only two of the GoC's procurement platforms. This narrow focus was the product of the limited resources at my disposal and a desire to maintain both project manageability and ensure methodological coherence. The result was a refraining from investigating procurement oriented transparency mechanisms operating across several government departments, as well as provincial and municipal jurisdictions. It seems plausible to assume these other procurement environments feature distinct institutional arrangements, procurement protocols, and stakeholder dynamics that differ from federal practices pertaining to the *Buyandsell.gc.ca* and *Proactive Disclosures – Contract Dataset* platforms. Incorporating an examination of a sampling of procurement platforms from these other complementary settings would have enabled conducting comparative analysis and, possibly, uncovering cross-jurisdictional variations in the exercising of vision voice.

A second limitation that risked undermining pursuing this research project concerns the near wall of silence I encountered in recruiting participants, especially from the private sector. Despite my extensive outreach efforts, some large numbers of potential participants declined to participate which, obviously, reduced the diversity and scope of perspectives regarding transparency in federal procurement processes related to me. Notably, the reluctance of some stakeholders to discuss transparency issues openly could itself suggest underlying concerns related to trust (e.g., uncertainty about how their input would be treated), risk (e.g., fear of professional or reputational repercussions), and openness (e.g., doubts about the safety or receptivity of government-stakeholder relationships when addressing sensitive topics). The upshot, as noted elsewhere in the dissertation, the reported findings are more soundly understood as likely being illustrative rather than indicative of the perspectives of actors with a stake in public procurement in Canada.

The recruitment challenges also suggest, to me at least, that future researchers may benefit from investing early in relationship-building, maintaining flexibility in recruitment timelines, and informally preparing a broad pool of potential participants prior to actually launching one's research project. Were I to undertake another study on similarly sensitive topic(s) at some future time, especially if it involving government practices and public spending, I would adopt an approach that anticipates coming up against such sensitivities and which employs adaptive, multi-channel engagement strategies to encourage and sustain participation. Being frank, at a personal level, I consider the latter to be both a limitation of my study and a contribution to the advancement of knowledge about the practicalities of conducting research involving human participants.

There is another limitation worthy of mention that emerged during the final phase of the research process. Shortly before submitting my dissertation for evaluation, I attempted to revisit the Buyandsell.gc.ca and *Proactive Disclosures – Contract Dataset* platforms with the aim of

identifying any notable changes in content that may have occurred in the period between when I had originally conducted the desk-based analysis and Spring 2025. It was then that I realized the process procurement data migration from Buyandsell.gc.ca to Canadabuys.canada.ca had been fully completed in November 2024.¹⁴⁸ This migration disrupted access to elements of the original interface and content, which are no longer available in their prior form. As a result, it was not possible to replicate the original assessment conditions or systematically refresh earlier observations no least because the ‘new’ platform is no longer publicly accessible.

One last limitation relates to the residual effects of the COVID-19 pandemic, which had implications for both the research process and the broader conditions under which my project was conducted. Although the key informant interview phase took place after the most acute phase of the crisis, many organizations continued to operate under modified arrangements, including remote work and shifting priorities. These factors contributed to delays in outreach and constrained opportunities for engagement, particularly with stakeholders who were seeking to balance post-pandemic workloads. The absence of in-person interactions also limited the relational depth that can be fostered through face-to-face interviews. Beyond these procedural impacts, the pandemic also shaped the personal context of my research insofar as I had to navigate prolonged periods of remote work and limited access to university campuses, libraries, and dedicated study spaces; resources that are essential to maintaining a productive academic environment. These constraints affected my ability to consult physical materials, benefit from informal peer interactions, and sustain a consistent research rhythm. Managing pandemic-related uncertainties while balancing personal and professional responsibilities occasionally disrupted my focus and time availability, particularly during the earlier phases of the pandemic.

¹⁴⁸ See, <https://canadabuys.canada.ca/en/news-and-events/buyandsell-being-redirected-canadabuys>

8.4 Directions for Future Research

This dissertation was designed to examine the dynamics of transparency and stakeholder engagement within federal procurement processes in Canada. Despite being context-specific and having been drawn from a small research sample of key informants, the findings are suggestive of potential lines of future inquiry.

1. Comparative approaches to transparency across levels of government. This dissertation focused exclusively on federal procurement transparency in relation to the GoC's two main public procurement platforms. However, procurement practices vary across provincial and municipal jurisdictions as well as across government departments and agencies. Although the GoC's procurement system is conditioned by policy instruments such as the Directive on Open Government¹⁴⁹ and membership in international organizations such as the OGP, provinces and municipalities operate within their own legislative and policy environments (e.g., Ontario's *Infrastructure for Jobs and Prosperity Act*,¹⁵⁰ Québec's *Loi sur l'accès aux documents des organismes publics et sur la protection des renseignements personnels*¹⁵¹). These variations may result in distinct operational approaches to transparency. Future research could examine how transparency mechanisms, platform designs, and legal mandates differ across levels of government. Specifically, it could investigate whether the barriers identified in this study—such as platform usability challenges, information fragmentation, and uneven stakeholder participation—are also present in provincial and municipal contexts. For instance, one could investigate questions such as: *Do provinces with stronger transparency laws (e.g., British*

¹⁴⁹ See, <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=28108>

¹⁵⁰ See, <https://www.ontario.ca/laws/statute/15i15>

¹⁵¹ See, <https://www.legisquebec.gouv.qc.ca/en/document/cs/A-2.1>

Columbia's Freedom of Information and Protection of Privacy Act)¹⁵² achieve more equitable outcomes than those with weaker regulatory frameworks? How do resource-limited local governments address transparency challenges, and what alternative or innovative approaches do they employ compared to well-resourced jurisdictions?

2. *Technical Evaluation of Procurement Platforms.* Much procurement-focused research adopts a centric lens; this dissertation included. Less examined are the connections between the operationalization of transparency in public procurement contexts and the underlying architectures, data infrastructures, or automation features of procurement platforms. To this end, future research could adopt a 'politics of technological properties' orientation to investigate how platform functionalities such as interoperability, metadata structures, algorithmic decision-making, and/or machine-readable data formats establish "arrangements of power and authority in human associations" and condition the "activities that take place within those arrangements" (Winner, 1986, p. 22). Such inquiries could assist in further unravelling interconnections usability and accessibility challenges on the one hand and design, policy, and digital infrastructure limitations on the other.

3. *Cross-Cultural Understandings of Transparency Beyond the Canadian Context.* Although this dissertation focused on transparency in the Canadian federal procurement context, its findings raise questions about the cultural specificity of transparency in terms of how this concept is understood, operationalized, and institutionally embedded. This study identified limitations relating to information accessibility and stakeholder engagement in the GoC's procurement environment. These challenges suggest that even in well-resourced and normatively open systems, transparency is not uniformly experienced or realized. Building on this observation, future research could

¹⁵² See, https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00

undertake cross-cultural comparative studies to examine how transparency in public procurement is conceptualized and practiced in non-Western contexts—such as those, for example, in North Africa or the Middle East. Such investigations would shed light on how differing political cultures, institutional capacities, and civil society dynamics shape interpretations of openness, potentially questioning the universality of dominant theoretical frameworks, including the vision and voice model employed in this dissertation.

4. Reconceptualizing Transparency Through Indigenous Data Sovereignty. This dissertation conceptualized transparency within a North American, liberal-democratic framework, emphasizing visibility of information and opportunities for exercising voice in decision-making. While this framing guided the study’s examination of federal procurement transparency, it is worth considering that understandings of transparency may vary within Canada’s diverse cultural landscape, including among First Nations, Métis, and Inuit communities. These groups often engage with concepts of openness and data governance through distinct principles related to data sovereignty, self-determination, and historical context (M. Paul, 2023; Inuit Tapiriit Kanatami, 2018; Lujan, 2014). In such contexts, transparency might emphasize community control over information flows and culturally appropriate accountability mechanisms, complementing more conventional notions of public disclosure. Future research could investigate how transparency intersects with Indigenous epistemologies and governance frameworks, thereby contributing to a more nuanced and inclusive conception of transparency in Canada.

8.5 Final Thoughts

When I began this dissertation project five years ago, my aim was to develop a deeper understanding of how transparency in government procurement is manifested in practice—specifically regarding access to procurement-related information and the ways stakeholders

interact with procurement systems. I anticipated that transparency would be primarily characterized by the visibility of data, public access to procurement processes, and, to a lesser extent, the availability of opportunities for engagement. Although existing scholarship has emphasized the value of visibility and participation in government processes, the ways in which these ideals materialize in the everyday workings of federal procurement remain less clearly articulated.

The findings of this dissertation suggest that although federal institutions have implemented mechanisms to promote transparency—such as online platforms and public datasets—various structural, procedural, and experiential challenges continue to shape how these tools are accessed, interpreted, and utilized. However, transparency efforts may fall short unless underlying challenges are addressed to ensure information is genuinely accessible and usable for all interested parties. Various stakeholders—including private businesses, civil society representatives, and government officials—shared their differing experiences and concerns. These differences suggest that transparency in the procurement context at least is not a uniform or monolithic construct. Rather, it is mediated by users’ institutional roles, familiarity with procurement systems, and access to relevant information. However, and as made clear by those who participated this study, transparency in the procurement domain cannot be reduced to the mere release of data. It depends on the meaningful visibility of information, the usability of platforms, and the extent to which users are equipped to meaningfully engage with the procurement environment. While open datasets and digital tools remain important, they did not consistently convey information that is clear, relevant, or readily accessible in practice. This underscores the importance of examining what information is disclosed, as well as the processes through which it is selected, communicated, and contextualized.

These findings carry important implications for both policy and scholarship. They reveal the complex interplay between institutional design and user experience, suggesting that compliance with transparency requirements does not inherently guarantee that information will be accessible or useful to all interested parties. This disconnect is perhaps most clearly exemplified by the recently completed transition from Buyandsell.gc.ca which was a publicly accessible platform allowing any interested party to view procurement information without restriction to Canadabuys.canada.ca, that now limits access to suppliers possessing a Canada Revenue Agency business number. Framed as part of a modernization effort, this shift introduces new limitations that run counter to longstanding federal narratives about openness and inclusivity, including the GoC's 2024 Trust and Transparency Strategy.¹⁵³ In so doing, the shift underscores the fragility of transparency in practice and reveals how even well-intentioned digital transformations may, in practice, narrow rather than expand the avenues through which transparency is exercised and experienced.

In sum, this dissertation reaffirms the complex nature of transparency; its role as both a destination and a guiding compass in the evolving relationship between government and its stakeholders. Within the contours of Canadian federal procurement, transparency emerges as both a procedural method and a policy mandate, a standard of practice and a principle of accountability, a tool for stakeholder engagement and a testament to the commitment to open and responsive governance. Yet despite this complexity, the findings are clear: transparency is neither a means nor an end—it is, unmistakably, both.

¹⁵³ See, Treasury Board Secretariat (2024).

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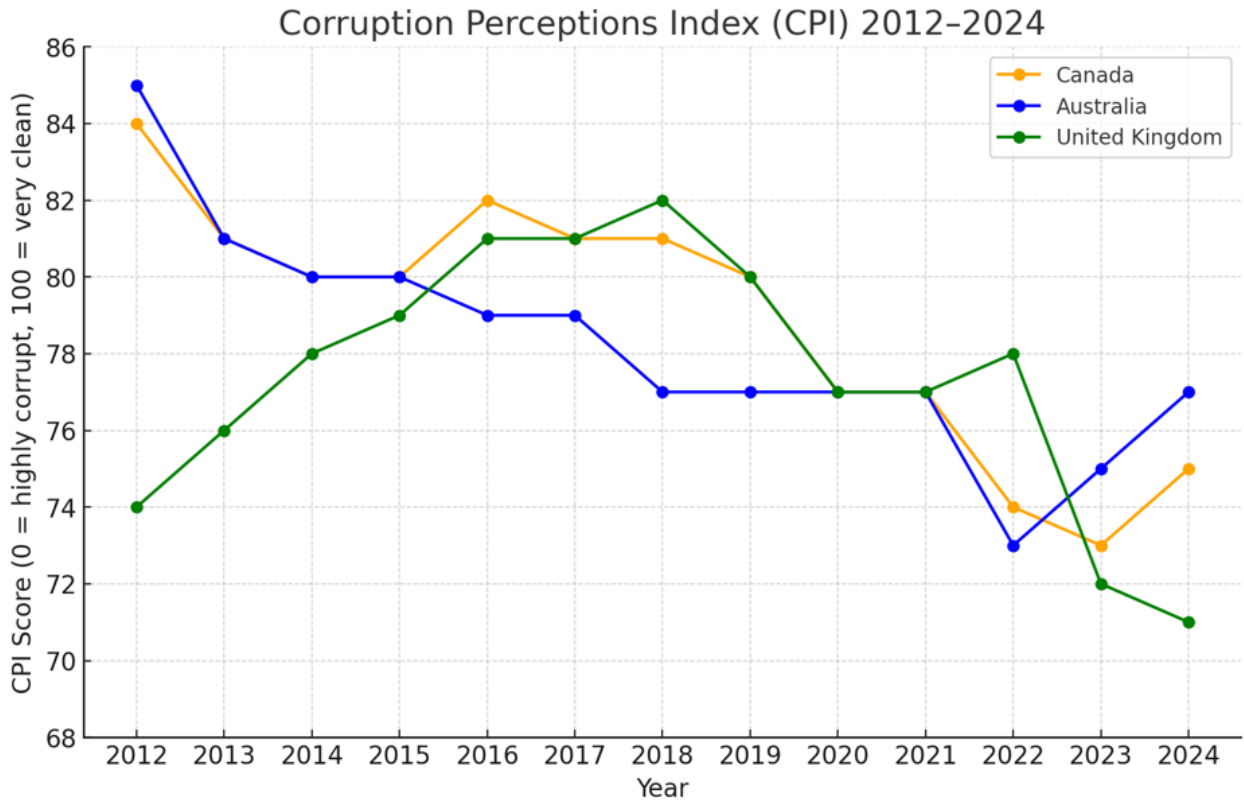
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Appendix A: Comparative Trends in Transparency International's Corruption Perceptions Index (CPI), Canada, Australia, and the United Kingdom (2012–2024)



Source: Transparency International Canada, February, 2025
<https://www.transparency.org/en/countries/canada>

Appendix B: Basel AML Index Rankings for Australia, Canada, and the United Kingdom (2012–2024)

Year	AML Risk Score (10 = High Risk)			Global Rank			Total Countries Ranked	Risk Level
	<i>Australia</i>	<i>Canada</i>	<i>UK</i>	<i>Australia</i>	<i>Canada</i>	<i>UK</i>		
2024	4.04	4.47	4.14	148	122	140	164	Low
2023	3.69	4.28	3.66	137	121	140	152	Low
2022	3.65	4.25	3.63	115	101	117	128	Low
2021	3.75	4.67	4.05	98	77	93	110	Medium
2020	3.84	4.68	4.02	124	94	116	141	Low
2019	4.08	4.92	4.23	106	79	94	125	Low
2018	4.06	4.92	4.23	115	86	106	129	Low
2017	3.87	4.66	4.57	114	86	109	146	Medium
2016	4.3	5.0	4.77	120	105	121	149	Medium
2015	4.2	5.26	4.68	122	95	125	152	Medium
2014	5.01	5.29	4.72	124	108	135	162	Medium
2013	4.58	5.11	4.81	130	109	119	149	Medium
2012	4.37	5.0	4.66	115	110	100	144	Medium

(Source: Basel Institute on Governance, Public AML Index Reports, 2012-2024)


<https://index.baselgovernance.org/api/assets/4efec692-a455-4af7-9cf8-0cc00d749cf6>


Appendix C: Illustrative Transcript Excerpts with Manual Coding (Color Marking)


Stakeholder group	<i>Private Sector</i>	<i>Civil Society</i>	<i>Government</i>
<p>Transcript Excerpt</p>	<p>...there are some RFPs that are written quite well and comprehensive and others that are full of holes... requiring back-and-forth with the authority to clarify objectives.</p> <p>We have a large bid we've been working on. We sent three sets of questions... we don't have an answer and this closes in a couple of days. The answers will influence how we respond.</p> <p>Sometimes, depending on the authority, you can get that information or you don't. We had to ask the same question seven different ways before we got an answer.</p> <p>With any RFP you do have recourse, but it's time-sensitive... if you're one day over the 10-day window after being informed, you won't qualify.</p> <p>When they get into contract negotiations and terms change, that can be a game changer... I could have come in second because it was going to cost me more based on that term—no access to that information afterward.</p>	<p>Yeah. I mean, it's not very easy, which is part of the challenge because there's lots of problems with the way the data is structured.... businesses don't have unique identifiers, so if you wanna know for example how much the federal government has spent on contracting with IBM, it's impossible to do that in a straightforward way because you can't really search just by that.</p> <p>Yeah, I think two issues: one is that the firms don't have consistent naming and the second is that the categorization scheme for different contracts is not clear... it's not clear how certain contracts are classified and why.</p> <p>I haven't had anybody reach out to me specifically to say: we noticed you spent a lot of time on our website... or that you're an expert in this area; that hasn't happened.</p>	<p>From a department level, we can do better. It's still one-way: here's the portal, consume what you want. Not a lot of proactive effort to make navigation simpler or information more discoverable.</p> <p>When it comes to policies or reports, we're good at saying 'here's a policy we have' rather than 'here's a policy we want to create—let's create it together.'</p> <p>Often you're told where to find documents, but there's no structured way to provide input. Even when information is visible, there are no channels for real feedback.</p> <p>There's enthusiasm among some public servants, but it's not a high priority. Limited resources; open data and proactive engagement treated as side-of-desk work.</p> <p>Some platforms are difficult to navigate; the way information is presented makes it harder for smaller suppliers to find what they need quickly. The info exists, but accessibility remains a persistent problem.</p>

Stakeholder group	<i>Private Sector</i>	<i>Civil Society</i>	<i>Government</i>
	<p>We have a standing offer; every time there's an opportunity, I have to go back to the same vendor partners across Canada and have them sign forms all over again for exactly the same service... very prohibitive.</p> <p>There's a tendency now to buy things as a service... and they hide behind that. If I ask how many printers they're replacing, they'll say '</p> <p>"can't give you that information, this is a service."</p> <p>This is a \$1,000,000 order closing the last week of the fiscal year. Worst possible timing—tight timelines on us, but not flexible on their own timelines.</p>	<p>It's not easy to interpret the data, and it's hard to look for patterns across firms. don't attach outcomes of contracts (on time, late, quality).</p> <p>There's lots of room for the government to improve... I don't think people in the public service are trying not to release data; it's more a resource and priority issue.</p> <p>They can stagger the release of information so that it has the least amount of impact... it definitely was not publicized... it's just there so people... can't question it was a backroom deal.</p> <p>When it comes to providing feedback... you can appeal... It's... a checkbox. We have a mechanism for people to appeal."</p> <p>... It's who has the time and the resources to be able to do that... it just doesn't happen.</p>	<p>Engagement feels procedural. Consultations happen, but they don't feel like they will change anything. It's not clear whether stakeholder comments influence decisions.</p> <p>Sometimes information is public but so technical that few outside government can use it. That limits visibility and prevents meaningful participation.</p> <p>Many public servants genuinely want transparency, but legacy systems and administrative requirements slow change. It's not a lack of will; the system creates obstacles.</p>

 **Vision:** Visibility of procurement information (Platform Utilization, Accessibility, Information Quality)

 **Voice:** Stakeholder participation in the procurement process (Complaints & Appeals, Feedback & Consultation, Engagement)

 **Overlapping:** Passages that overlap between Vision and Voice

 **Indeterminate:** Passages that do not clearly fit in one category

Appendix D: Ethics Approval

25/09/2024

Université d'Ottawa

Bureau d'éthique et d'intégrité de la recherche

University of Ottawa

Office of Research Ethics and Integrity

CERTIFICAT D'APPROBATION ÉTHIQUE | CERTIFICATE OF ETHICS APPROVAL

Numéro du dossier / Ethics File Number	S-11-21-7550
Titre du projet / Project Title	The Effectiveness of Seeking Transparency Through the Open Government Partnership in Canada
Type de projet / Project Type	Thèse de doctorat / Doctoral thesis
Statut du projet / Project Status	Renouvelé / Renewed
Date d'approbation (jj/mm/aaaa) / Approval Date (dd/mm/yyyy)	07/10/2022
Date d'expiration (jj/mm/aaaa) / Expiry Date (dd/mm/yyyy)	06/10/2025

Équipe de recherche / Research Team

Chercheur / Researcher	Affiliation	Role
Othman ARHOMA	Département de communication / Department of Communication	Chercheur Principal / Principal Investigator
Daniel PARÉ	Département de communication / Department of Communication	Superviseur / Supervisor

Conditions spéciales ou commentaires / Special conditions or comments

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Université d'Ottawa

Bureau d'éthique et d'intégrité de la recherche

University of Ottawa

Office of Research Ethics and Integrity

Le Comité d'éthique de la recherche (CÉR) de l'Université d'Ottawa, opérant conformément à l'*Énoncé de politique des Trois conseils* (2014) et toutes autres lois et tous règlements applicables, a examiné et approuvé la demande d'éthique du projet de recherche ci-nommé.

L'approbation est valide pour la durée indiquée plus haut et est sujette aux conditions énumérées dans la section intitulée "Conditions Spéciales ou Commentaires". Le formulaire « Renouvellement ou Fermeture de Projet » doit être complété quatre semaines avant la date d'échéance indiquée ci-haut afin de demander un renouvellement de cette approbation éthique ou afin de fermer le dossier.

Toutes modifications apportées au projet doivent être approuvées par le CER avant leur mise en place, sauf si le participant doit être retiré en raison d'un danger immédiat ou s'il s'agit d'un changement ayant trait à des éléments administratifs ou logistiques du projet. Les chercheurs doivent aviser le CER dans les plus brefs délais de tout changement pouvant augmenter le niveau de risque aux participants ou pouvant affecter considérablement le déroulement du projet, rapporter tout événement imprévu ou indésirable et soumettre toute nouvelle information pouvant nuire à la conduite du projet ou à la sécurité des participants.

The University of Ottawa Research Ethics Board, which operates in accordance with the *Tri-Council Policy Statement* (2014) and other applicable laws and regulations, has examined and approved the ethics application for the above-named research project.

Ethics approval is valid for the period indicated above and is subject to the conditions listed in the section entitled "Special Conditions or Comments". The "Renewal/Project Closure" form must be completed four weeks before the above-referenced expiry date to request a renewal of this ethics approval or closure of the file.

Any changes made to the project must be approved by the REB before being implemented, except when necessary to remove participants from immediate endangerment or when the modification(s) only pertain to administrative or logistical components of the project. Investigators must also promptly alert the REB of any changes that increase the risk to participant(s), any changes that considerably affect the conduct of the project, all unanticipated and harmful events that occur, and new information that may negatively affect the conduct of the project or the safety of the participant(s).

Coordonnateur / COORDINATOR

Coordonnateur de l'éthique / Ethics Coordinator

Pour/For Barbara GRAVES Président(e) du/ Chair of the Comité d'éthique de la recherche en sciences sociales et humanités / Social Sciences and Humanities Research Ethics Board

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Appendix E: Interview Questions

The following list of questions was used to guide discussions with key informants from each stakeholder group:

Questions for private sector key informants

1. Is Buyandsell.gc.ca and/or *Proactive Disclosures – Contract Dataset* the procurement platform most frequently used by your firm to access procurement information or/and communicate with government procurement entities?
2. From the perspective of your firm, what is the most meaningful and/or relevant information that it accesses at this site? How easy is it to find this information on the platform?
3. What are the main challenges encountered when using these two platforms?
4. a) What types of information does your firm typically seek out in deciding whether to submit a tender to provide goods/services?
b) Is this type of information usually available to your firm in a useful format and in a timely manner on the platform?
5. a) Once your firm has decided to proceed with submitting a tender, is there additional types of information that it needs?
b) If so, what types of information, and is it usually available in a useful format and in a timely manner on the platform?
6. How easy is it for your firm to submit tenders using Buyandsell.gc.ca?
7. a) Please can you walk me through the process of how a firm that uses Buyandsell.gc.ca is advised of its bid having been successful?
b) Are parties notified if/when their bids have not been successful? How does that work on Buyandsell.gc.ca?
8. a) Once a procurement contract has been awarded that your firm bid on but did not win, how important is it for your firm to be kept up to date about any contract modifications and/or termination with the winning provider?
b) How easy is it to access this type of information on Buyandsell.gc.ca?
9. a) What channels of recourse are open to your firm to file express concerns and/or file a complaint should it identify irregularities with the procurement process?
b) Has your firm ever filed a complaint about a procurement process? If yes, was the complaint dealt with in a timely manner?
10. a) Is there a mechanism on Buyandsell.gc.ca for submitting appeals?
b) If yes, has your firm ever used it?
c) If yes, is the time needed and procedure for filing an appeal adequate?
11. Are there other procurement sites that your firm uses to tender bids to provide products/services?
12. Does Buyandsell.gc.ca consult with its users on a regular basis about how to improve its procurement services so as to better meet user needs?

Questions to Civil Society key informants

1. Does the organization you represent access Buyandsell.gc.ca and/or the [Proactive Disclosures – Contract Dataset](#)? If yes: (1) How frequently? And, (2) for what purpose(s).
2. What are the main challenges/barriers encountered when accessing the platform(s)?
3. How meaningful and relevant is their content to the organization you represent?
4. For the purposes of the organization you represent, is the information at one of the platforms more useful than the other? Why/How?
5. a) What are the main types of information the organization you represent seeks to access from either or both platforms?
b) How easy is it to find this type of information?
c) Are these types of information published in a timely manner and in a format that the organization you represent deems user-friendly?
6. Does the organization you represent have access to attend the public opening of tenders?
7. Is there a mechanism in place for the organization you represent to provide input/feedback about concerns it may have about either or both platforms?
8. Is the feedback considered?
9. Does the government consult the organization you represent when formulating changes to its procurement platform(s)

Questions to government key informants

1. What are the main challenges you face in regard to the objectives bellow?
 - a) Meeting accessibility standards.
 - b) Ensuring that the information about government procurement activities is visible to interested parties.
 - c) Meeting stakeholders demands for quality information in timely manner.
 - d) Having to meet the obligations of the Official Language Act?
2. How are these challenges manifest on Buyandsell.gc.ca and/or [Proactive Disclosures – Contract Dataset](#)?
3. What strategies has the government been using to address these challenges?
4. How has government participation in the OGP influenced the procurement process?
5. a) What mechanism does the government have in place solicit input from stakeholders?
b) What happens to/with these inputs?
6. a) How does the procurement process contribute to the government's vision of transparency?
b) How does the process contribute to the government's commitment to accountability?