

Open Public Consultation: Revision of the European Interoperability Framework (Citizens)

Fields marked with * are mandatory.

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Introduction

One of the priorities of the Juncker Commission is to create a Digital Single Market, where the **free movement of goods, persons, services and capital** is ensured and where citizens and businesses can seamlessly and fairly access online goods and services, whatever their nationality, and wherever they live. The Digital Single Market also means that **information should be exchanged easily** nationally and across borders, helping citizens to fully benefit from the freedoms of the single market (e.g. moving countries for work, studying or retiring abroad).

In this context, “**interoperability**” is crucial. Interoperability is the ability of public administrations to interact with their citizens through their public services in an easy and timely manner, mainly over online systems. Examples are the tax declaration, request for certificates, etc.

The general objective of this questionnaire is to understand the needs from EU citizens, as well as the potential issues they face, when it comes to digital public services. These include the digital public services provided by your country’s administrations but also by other EU countries’ administrations.

Completing the survey should not take more than 15 minutes.

In case you need any additional information about this Impact Assessment, please do not hesitate to contact DG DIGIT B6 directly by addressing an email to the following address: DIGIT-ISA2-CONSULTATIONS@ec.europa.eu or by post at:

E u r o p e a n
D G

C o m m i s s i o n
D I G I T

Unit B6 - Interoperability solutions for European public administrations (ISA)
B - 1049 Brussels

1. Registration

*** Surname:**

*** Name:**

*** Email address:**

*** What is your nationality?**

- Austria
- Belgian
- British
- Bulgarian
- Croatian
- Cypriot
- Czech
- Danish
- Dutch
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Icelandic
- Irish
- Italian
- Latvian
- Liechtenstein
- Lithuanian
- Luxembourg
- Maltese
- Norwegian
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish
- Other

*** Where do you live?**

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Norway
- Other

*** How old are you?**

- Under 20
- 20-40
- 41-65
- More than 65

* Before you reply to this public consultation, please tell us to what extent you are aware of the European Interoperability Strategy and its content.

- Fully aware
- Partially aware
- I only found out about it through this public consultation
- Don't know / No opinion

* Before you reply to this public consultation, please tell us to what extent you are aware of the European Interoperability Framework and its content.

- Fully aware
- Partially aware
- I only found out about it through this public consultation
- Don't know / No opinion

2. Publication consent

* Please indicate your preference for the publication of your response on the Commission's website:

- Under the name given:** I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Anonymously:** I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Please keep my contribution confidential.** (it will not be published, but will be used internally within the Commission)

3. Assess the need of revising the EIS and EIF

In December 2010, the Commission adopted the Communication "[Towards interoperability for European public services](#)" that included the [European Interoperability Strategy \(EIS\)](#) and [European Interoperability Framework \(EIF\)](#).

Following recent political, legal and technological evolutions, a revision is now necessary so that interoperability is ensured for the public services of the Digital Single Market and that e-barriers do not emerge between the public administrations of the Member States to the detriment of other public administrations, businesses and citizens that need to interact with them.

Questions included in the following sections will focus, on the one hand, on interoperability at Member States' (national) level and, on the other hand, on interoperability at cross-border level.

3.1 Assessment of needs and problems at Member States level

The following set of questions will address [interoperability at Member State level](#), i.e. between citizens and national public administration's entities of different levels and sectors.

* Q1. How often have you used the digital public services provided by your country's administrations during the last year?

- Never used
- Rarely used
- Occasionally used
- Frequently used
- Always used
- Don't know / No opinion

*** Which digital public services have you used the most frequently?**

gov.uk, tax website (HMRC), parking administration, local tax (council tax), voter registration

*** What are the main issues, if any, that you have faced when using digital public services provided by your country's administrations?**

Fragmentation and lack of transparency over who is running and building the digital services and who specifically has access to the data I submit.

*** Q2. How likely is it that you would prefer using digital public services provided by your country's administrations instead of other means (e.g. post, phone calls, physical presence)?**

- Not at all likely
- Rather not likely
- Neither likely nor unlikely
- Rather likely
- Very likely
- Don't know / No opinion

*** Q3. To what extent did the digital public services provided by your country's administrations meet or exceed your expectations?**

- Far below my expectations
- Slightly below my expectations
- Meet my expectations
- Slightly above my expectations
- Far above my expectations
- Don't know / No opinion

*** Please select the reason(s) why digital public services provided by your country's administrations do not meet your expectations.**

- There is no one single portal through which I can access all digital public services
- The public services are not all fully digitised. I have to interact with the public administrations through other channels, e.g. phone, mails, post, physical presence.
- I have no trust that my transaction and personal data will be secured
- Published information is not complete, not concise enough, outdated or irrelevant
-

- I face accessibility issues: the user interface is not well designed or it is difficult to navigate through the content or access for people with disabilities or the elderly is not taken into account
- I do not get enough support from public administrations while using digital public services
 - I have to submit, although electronically, my personal data many times when using different digital services
 - I have to use different ways of authenticating myself for the different digital services I am accessing
 - The digital public services available are not user-friendly enough (e.g. use of legal and administrative jargon)
 - Other
 - Don't know / No opinion

*** Please indicate the other reason(s) you are referring to.**

* Broken links (eg to a payment system that no longer works but just says 'try again in a few minutes')

* Fragmentation of payment site eg some via Capita/Worldpay others through other providers

* Historical information often uses websites with completely different UI/UX That said it is early days and the services are improving so please keep up the good work just be aware the benefits from digital services are huge, security is very important and vested interests appear to be lobbying hard on data access/ownership.

3.2 Assessment of needs and problems at cross-border level

The following set of questions will address [interoperability at cross-border level](#), i.e. between citizens and public administrations that are not located in the same country.

*** Q4. Have you had the need to interact with public administration(s) located in another country than your own during the last year?**

- Yes
- No

*** Q5. How often have you used the digital public services provided by other EU countries' administrations during the last year?**

- Never used
- Rarely used
- Occasionally used
- Frequently used
- Always used
- Don't know / No opinion

*** What are the main issues, if any, that you have faced when using digital public services provided by other EU countries' administrations?**

Language barrier, authentication, data security and ambiguity of what is being asked (different cultural norms)

*** Q6. How likely is it that you would prefer using digital public services provided by other EU countries' administrations instead of other means (e.g. post, phone calls, physical presence)?**

- Not at all likely
- Rather not likely
- Neither likely nor unlikely
- Rather likely
- Very likely
- Don't know / No opinion

*** Q7. To what extent do digital public services provided by other EU countries' administrations meet or exceed your expectations?**

- Far below my expectations
- Slightly below my expectations
- Meet my expectations
- Slightly above my expectations
- Far above my expectations
- Don't know / No opinion

*** Please select the reason(s) why digital public services provided by other EU countries' administrations do not meet your expectations.**

- There is no one single portal through which I can access all digital public services
- The public services are not all fully digitised. I have to interact with the public administrations through other channels, e.g. phone, mails, post, physical presence.
- I have no trust that my transaction and personal data will be secured
- Published information is not complete, not concise enough, outdated or irrelevant
- I face accessibility issues: the user interface is not well designed or it is difficult to navigate through the content or access for people with disabilities or the elderly is not taken into account
- I do not get enough support from public administrations while using digital public services
- I have to submit, although electronically, my personal data many times when using different digital services
- I have to use different ways of authenticating myself for the different digital services I am accessing
- The digital public services available are not user-friendly enough (e.g. use of legal and administrative jargon)
- Information is not sufficiently translated in my native language
- Other
- Don't know / No opinion

*** Please indicate the other reason(s) you are referring to.**

Entry fields are often not international eg require a local address and telephone number. Assumptions about localisation are also invalid eg a Spanish bank account defaults to Spanish localisation and won't allow UK address entry.

4. Accompanying document

The document accessible [here](#) is a draft version of the revised European Interoperability Framework (EIF). While still being under continuous improvement by the Commission Services, it already reflects the results of a targeted consultation with the Member States representatives to ISA programme (the predecessor of ISA²), as well as other inputs.

The EIF is a technical document, mainly addressing recommendations on interoperability, based on an existing framework and as such is herewith consulted with stakeholders. It mainly addresses recommendations on interoperability.

Q8. Please feel free to express any further comment that you may have on the draft revised EIF text.

Two important comments that undermine the EIF in the current form:

The section "Openness of formalised specifications" is incompatible with open source software in the current form. Its ambiguity amounts to a restriction on open source. It appears unintended and should be remedied by explicitly stating "Intellectual property rights related to the specification are licensed in such a way that allows implementation in both proprietary software and by all open-source projects." That clearly establishes the intent and implementation of the section. A sentence such as "This license may either be on FRAND terms or preferably on a royalty-free basis as long as the scope of implementation is not restricted." can maintain the reference to FRAND if required without undermining the rest of the section.

Section "2.1 Underlying principle 3: Openness and Transparency." is much worse than the equivalent section in EIF v2. The essential element of sharing has been removed which takes all real meaning out of it and makes EIF v3 incompatible with positive behaviours such as open source. If you believe open source is a powerful method for social and economic progress (as I do) a return to the EIF v2 phrasing of: "In the context of the EIF, openness is the willingness of persons, organisations, or other members of a community of interest to share knowledge and stimulate debate within that community, the ultimate goal being to advance knowledge and the use of this knowledge to solve problems." reintroduces the key component of sharing which must be present to make it workable in reality.

Thank you.

Contact

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