

Malta Country Report

www.gov.mt

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Introduction

This country report provides an overview of existing Point of Single Contact (PSC) infrastructure and services offered in Malta.

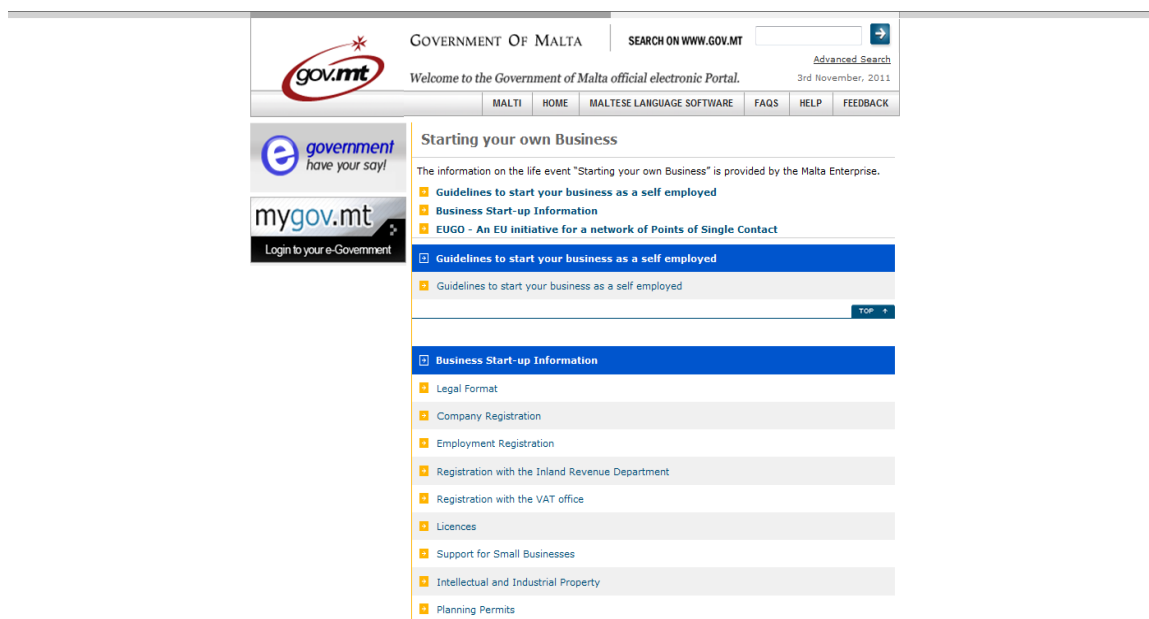
The report provides details about the availability and quality of services found during portal testing by e-Government experts, views obtained from end-users from Maltese users during focus group sessions¹ about usability of the portal and the views of portal staff and other e-Government experts about the development and functioning of the portal.

For ease of cross-referencing the text in this document refer to appropriate tables but which tables have been placed in a separate annex. Annex B provides the tables referred to in this document. Annex A provides details of six scenarios used during the study; these are referred to in Section 2.

There is one virtual Point of Single Contact in Malta, which is hosted on the website of the Maltese government (www.gov.mt). The section dedicated to the Point of Single Contact can be accessed from the homepage, via the tab on the right hand called businesses, with EUGO logo ("starting your business", under other e-services). The website acts as an information gateway, providing information to users, as well as links to other websites (such as Value added Tax) which in turn offers more than mere information.

The website was launched in 2009. In 2011 information and functionalities provided were increased in order to comply with the Services Directive. However, as will be explained later, a new website, supporting more sophisticated functionalities, is being developed, and will be integrated with the existing website in the next future.

¹ End-user testing was undertaken by focus group participants and Deloitte experts in each country studied. Participants examined the PSC in their home country and one 'other' country. Details of the scenarios and country 'pairings' can be found in Annex A.



Malta Enterprise, the agency entrusted for the Point of Single Contact, along with MITA (Malta Information Technology Agency) is in the final phase of developing a second site (<https://forms.mygov.mt>). This site is expected to provide more sophisticated functionalities, while working in harmony with the current website. The Agency has identified 53 services that need to be supported and has invested in a uniform platform, with the same “look and feel”, to address these services providing two way interaction, the possibility to upload any documentation required and online payments when necessary. The site will also be equipped with mail box facilities to enable users to interact with the competent authority handling the application. Furthermore, it will provide a timeline process timeline application: in this way, users will have a better understanding of the administrative process, and of the status of their application.

MITA pointed out that the overall site is ready with 43 of the services having gone live (not via the PSC Portal), and that the Agency is awaiting for the 10 remaining services to be completed before integrating the site with the current PSC portal.

We had been given access to this site while still in the development phase. However, since at that time there was no defined timeline for its completion, it was decided to focus the analysis on the website available to the public. Since then we have been advised that the new site is expected to be integrated with the PSC site in January 2012.

The current PSC site is available in two languages, English and Maltese. It does not make a distinction between permanent establishment and cross border activity since the legislative framework does not make such difference. The site supports the thematic areas in Table 1 in Annex B. These include: starting up a business (advice on legal structures, company registrations, permits, insurance), employment and tax issues.

2 Availability and quality of PSC services

Points of Single Contact are the most visible benefit of the Services Directive for businesses. They are meant to become fully fledged e-government portals allowing future entrepreneurs and existing businesses to easily obtain online all relevant information relating to their activities (applicable regulations, procedures to be completed, deadlines, etc.) and to complete electronically the relevant administrative procedures. The services offered by PSCs need to be available not only in the country of the administration but must also be accessible for businesses from other countries, across borders. Malta's situation in this regard is somewhat unique being a very small island in the middle of the Mediterranean. The expectation is that this portal will have more use to local business rather than foreign.

The degree of availability of services through the PSCs was analysed on the basis of six business scenarios. The six scenarios focused on concrete examples in three sample sectors – architecture, restaurants/catering and tourism. One set of three scenarios focused on establishing a permanent business in the specific sector in Malta – these are called the 'establishment' scenarios. Three other scenarios investigated the steps required if someone from outside Malta wants to temporarily provide a service in Malta – these are called the 'temporary cross border' scenarios. These terms are used throughout the tables and text in this report. Details of the scenarios can be found in Annex A.

For each scenario, eight groupings of administrative formalities (e.g. authorisation schemes, licenses, other procedures etc.) that businesses are most typically obliged to fulfill in order to provide their service activities were examined. For each grouping, the study analysed to what degree information was available through the PSC and to what extent a business was able to complete the relevant procedures electronically.

The eight groupings (henceforth called 'types of administrative requirements') are:

1. Company registration.
2. Obtaining a general business license.
3. Procedures relating specifically to the service provider/ profession that they are exercising (recognition of professional qualifications, licenses to act as a travel agent, architect, sell alcohol etc.).
4. Tax and financial formalities.
5. Social security formalities.
6. Regulations relating to the premises of the provider, such as providing proof of the location and/or ownership of the premises.

7. Procedures relating to the way the service are carried out and the place the service is carried out, such as applying for authorisation to make outdoor sales or serve food on a street. (Called 'operations and location' in later tables).
8. Procedures applying only or specifically to cross border provision of services.

These eight types of administrative requirements cover the most common procedures businesses usually need to comply with when starting their activities. In order to complete the above requirements, service providers are often required to provide specific supporting documentation (e.g. proof of insurance coverage, proof of good repute, etc.). The different supporting documents are referred to in the tables contained in the annex as "Procedural components that may be relevant to the preceding procedures". They include:

- Provide a translation of legal documents produced in another country;
- Provide details of the location of the business;
- Provide proof of the ownership of the business;
- Demonstrate proficiency in the local language;
- Demonstrate good repute or the lack of a criminal record;
- Prove accreditation from a financial organisation guaranteeing funds if the business should fail;
- Provide official proof of your experience or qualifications;
- Provide official proof of your identity;
- Provide proof that you are not bankrupt;
- Provide proof that you have sufficient financial resources / solvency;
- Provide evidence of relevant insurance;
- Provide proof that you have no outstanding tax payments.

The availability of most of the above eight groupings of procedures is mandatory under the Services Directive, for others it is not (in particular social security and tax procedures). However, from a business perspective, it is strongly recommended to make available all these procedures through the PSCs, as they are the main steps required to start a business or to provide cross-border services.

In this section the availability and quality of the three main tasks of the PSC are assessed: provision of information to businesses, completion of online procedures and assistance to PSC users.

The regulatory environment in Malta can be defined as quite high. The development of the PSC has often led to standardization and simplification of processes. In the case of Malta, however, this standardization and simplification process has not taken place so far. It is however possible that the development and implementation of the new PSC website, allowing online completion of several procedures, will give momentum to the administrative simplification process.

It must be noted that not all of these tasks exist in all Member States [and therefore some portals obviously did not provide them Online]. For example in Malta it is not necessary to apply for a general business license.

It should be noticed that the current Maltese site provides information for all matters related to local legislation (i.e., six out of eight, Maltese legislation does not require a general business license nor does it differentiate cross border activity). However, as stated earlier, the present publicly available PSC site does not support electronic completion of procedures.

2.1 Provision of information on the types of administrative requirements applicable to both establishment and temporary cross-border scenarios

The obligation to set up PSCs means, in practice, that businesses must be able to complete the entire cycle of all procedures and formalities relating to the access to or the exercise of their activities without having to contact any institutional interlocutors other than the PSC. The first key requirement for the PSCs is to make available all relevant information concerning applicable procedures.

2.1.1 Availability and quality of information

In a first exercise we looked at the **number and coverage** by the portal of requirements or process steps needed for permanent establishment or temporary services provision based on the business scenarios described above, see Table 3.

Table 3 shows that the Maltese portal provides all relevant information to fulfill the requirements of all three permanent establishments in Malta as well as the three cross border establishments (Maltese law does not differentiate between the two).

The Maltese legislation makes no differentiation between cross border registration and permanent establishment: thereby any entity wishing to make a temporary registration, be it Maltese or from another country, has to follow all the rules and registration of those intended of more permanent nature.

In total, 80 regulatory requirements need to be undertaken to complete the six scenarios of which 8 (10%) are provided directly through the PSC portal and 60 (75 %) are procedures covered by the web sites of competent authorities linked to the portal. The remaining 12 procedures (15%) are currently not served directly or indirectly via a website.

From Table 3 it is clear that across the three different sectors (Architecture, Restaurants & Catering, Travel Agents and Tour Guides), only a limited number of procedures is served online by the PSC portal (10%, 6% and 17% respectively). A higher percentage instead is served through other websites (70%, 83% and 67%), whereas a not negligible part of procedures is not served online at all (20%, 11% and 17% respectively). Therefore it emerges that the Restaurant & Catering scenario is better served than the other two included in the study, even though differences are not very wide.

In a second exercise we assessed the quality of the information provided by the portal for the eight types of administrative requirements mentioned previously.

Table 4 shows that the portal is adequate at providing all the relevant information for the six types of administrative requirements. The Maltese PSC website acts as a signpost, providing users with access to the sites of competent authorities. The submission of documents is currently only possible in some instances for the local PSC site or on the sites linked to the portal.

The column 'sector specific: person' (for professional scientific and technical activities) refers to the procedures for individuals to get the recognition of their professional qualifications. As can be seen from Tables 4, 6B, 8, 9, 10, 11 and Table 18, some information about these procedures are provided by the PSC website, but users are usually referred to the website of competent authorities to have all the information necessary. Online completion of the task is not possible, neither through the PSC portal nor through the competent authority's website. Additional supportive electronic features such as tracking tools are not supported. Cross-border procedures are not applicable as the Maltese law does not differ that from permanent establishment.

The portal does not provide much functionality to help users finding the information needed, as Tables 5 demonstrates. It supports a simple search function, as well as an advanced search with dropdown menus to refine the search.

2.2 Electronic completion of procedures: coverage and level of sophistication

The Services Directive establishes an obligation on Member States to make it possible for service providers to complete a number of key administrative formalities related to the establishment or cross-border provision of services online and across borders. This includes both the submission of an application (with supportive documents) as well as the receipt of the administrative decision from the responsible competent authority.

If e-signatures are required in the context of e-procedures, Member States have to accept as a minimum advanced e-signatures supported by a qualified certificate and, if justified, also supported by a secure signature creation device (i.e. the qualified e-signatures)² Moreover, MS have to be able to technically process certain formats of advanced e-signatures (C/X/PAdES)³.

The sophistication of the PSC portals in terms of online completion of procedures is examined with a commonly adopted e-Government maturity model with a four-step scale. The four steps or stages of development are:

² Decision 2009/767/EC

³ Decision 2011/130/EU

1. *Information*: only the information required to understand how to complete the procedure is available;
2. *One-way interaction*: forms concerning the procedure that can be downloaded and printed are available (these can then be returned by post, email or taken directly to relevant competent authority offices);
3. *Two-way interaction*: forms concerning the procedure can be downloaded and uploaded, which enables the entrepreneur to *start* the procedure electronically. However, procedures are not fully online, some tasks need to be completed via alternative means (e.g. by post or visit to an office);
4. *Full case handling*: the whole procedure can be completed online (including the receipt of the administrative decision).

Table 6 shows that the PSC portal mainly provides information, referring users to other websites to carry out procedures. Portals of other competent authorities are also limited at providing information in many cases. It has to be noticed however that in some cases one and two-way interaction is also supported (mainly for procedures concerning company registration and VAT registration).

This is confirmed by Table 6B, which shows that no administrative task can be undertaken online as full-case handling. One or two-way interaction is supported only on websites of other competent authorities. In many cases, however, users only had to visit one additional website.

Access to one or two-way interaction requires users to have a Maltese eID. This eID consists of a username/password, in addition to a PIN code, and a digital certificate that can be downloaded from the portal site after registering for an eID. However, the eID is issued in Valletta or in Rabat upon presentation of a valid ID card⁴; thus, the eID is generally not available to foreign service providers. On that point, procedures that require service providers to have an eID do not yet meet the requirements of the Services Directive.

Overall the current site is acting like a signpost, pointing the user to the various portals, allowing the user to:-

- **On-line company registration / creation of a legal entity.** The registration of a legal entity via the Malta Financial Services Authority (MFSA) Portal requires the user to have a Maltese E-ID. With the E-ID the user can register with the site as an authorised user, enabling the person to make an online submission to the MFSA. Such online submissions include the registration of a new company, which requires the filing of the Memorandum and Articles of Association, uploading proof of capital (usually a bank deposit slip to a company in formation account) and payment of relevant fees by bank transfer or direct cash payment. The portal also supports online submission of certain

⁴ See [https://www.mygov.mt/PORTAL/\(gly4uf450cidm55554d2h045\)/downloads/mygov/e-Government%20Services%20Directory.pdf](https://www.mygov.mt/PORTAL/(gly4uf450cidm55554d2h045)/downloads/mygov/e-Government%20Services%20Directory.pdf)

forms (sending via email) such as notification of change in address, change in Directors as well as submission of Annual Returns.

- **Value Added tax Registration.** The registration of Value Added Tax with the VAT Department does not require an E-ID. The user can fill the online form and upload proof of identity of responsible VAT Payer.
- **Licences and Registrations.** The present PSC site, in conjunction with the Malta Government site (where the PSC is hosted), has extensive information for the registration of licences and registrations. Furthermore retail licensing in the main falls under the remit of local councils in Malta of which there are 68. Some local councils have an adequate website with level 2 information (Pdf's available for download) whilst other local councils are not so well prepared stating on their website that any application or payment of licences must be done at their offices. Other licensing, such as the application for a restaurant, fall under their own competent authority (Malta Tourism Authority) and will be available in two-way interaction when the new PSC portal will be finalised and made available. **Social security formalities.** Registration as an employer or registration as a self-employed is not catered for online.
- **Income Tax registration.** The Maltese income tax authorities have opted to use each individual Identity Card Number as their Income Tax number. Consequently Maltese citizens do not have to apply to be registered for tax as they automatically get enrolled into the tax system. Legal persons that are registered with the Registrar of companies are also automatically assigned an income tax number by the tax authorities. Consequently only non-Maltese persons are required to submit an application for registration, which may not be filed electronically.
- **Urban and environmental permit. Malta Environmental and Planning Authority** is the authority engaged for the issue of planning permits, urban planning, and environmental control. Any requirement to construct or alter premises or request a change of its use must be made with this authority. The MEPA portal requires a Maltese E-ID and also requires that any application of whatever nature is signed and submitted by an architect to the authority.

Apart from these, there are a number of procedures relating to the premises of the provider (e.g. compliance with food hygiene and terrace permits) and procedures relating to the way the service is carried out and the place the Service is carried out in (e.g. license to provide entertainment, and licenses to sell or serve alcoholic beverages) that are available via one-way interaction (such as downloadable forms that need to be submitted physically).

Table 7 shows that eIDs and eSignatures are required for the completion of online procedures. In particular, eIDs are required for users to register at the Financial Service Authority (MFSA) website for company registration and at the Environmental and Planning Authority (MEPA) for planning permits and urban planning. As noted above, the eID (including the certificate used for signing) are available only after prior registration (identity card number needed) in Malta.

Table 9 shows that for the completion of the six business tasks (those available under the Maltese legislation) more than 50 documents need to be exchanged. The PSC portal was not able to support the exchange of these documents. Limited support (as downloadable forms and in some cases web forms) was provided by the websites of competent authorities. Documents could be submitted as simple copies in many cases: an example is that, if an identity card needs to be submitted, and then a scanned file needs to be sent by email.

Applications for the registration of an activity, including the amendment thereof, may be submitted physically (that is on paper via a pdf download) or digitally by scanning the pdf and including it with an email.

As noted earlier in 2.1 the precise documentary requirements are largely determined by individual competent authorities and it is possible for local authorities to require different types of documents to complete the same task.

The current PSC portal, including the web sites of competent authorities, uses mainly the Portable Document Format for exchange of documents with the user. However the second PSC portal in development uses extensively Web Forms (or E-Forms) and some other sites (such as VAT) are already clearly moving in this direction.

There are no specific requirements for temporary cross-border service provision and, as explained before, the Maltese legislative framework does not make a distinction between establishment and temporary service provision.

Table 10 shows that four of the eight types of administrative requirements to be undertaken in Malta require payment (namely, company registration, sector specific: person, premises of the provider, operations and locations). However, nor the PSC website nor the portals of competent authorities support online payment facilities. It has to be remarked that the new PSC portal will provide this facility, but it has not been specified how.

From table 11 it emerges that none of the types of administrative requirements to be undertaken in Malta provides tracking services so that users can monitor the progress of the services they require. Two administrative requirements (company registration and sector specific: person) provide e-mail services to inform users about the outcomes of their requests, while traditional post service is used for procedures concerning tax formalities. Those three administrative requirements (company registration, sector specific: person, and tax formalities) deliver

administrative decisions by traditional mail, while the other types of administrative requirements included in the study do not provide this service.

In summary, the current Maltese PSC acts as a signpost, redirecting users to the websites of competent authorities. In general, however, users cannot complete procedures online (in most cases, only information and one-way interaction are available), and additional supporting features, such as online payments and tracking tools are not supported. Electronic identification and signatures are needed for some procedures. However, eIDs and eSignatures issued in other Member States are not currently supported. The development of the new PSC portal, supporting more sophisticated electronic services, should represent a great improvement.

2.3 Assistance to PSC users

As it emerges from Table 12, the Maltese PSC website provides a limited range of support tools for users. The ones available are: an email service to address individual queries, and telephone advice. Moreover, a FAQ section and downloadable guidelines are available to help users overcome problems when completing administrative procedures.

A simple standard query (concerning steps to be undertaken in order to provide temporary architect services, sent to all portals involved in the study) received a reply in 24 hours. The answer was clear, comprehensive and helpful in solving the issue. However, the query had to be sent to the general 'contact us' address of the site (which is the eGovernment access point for Malta), as the PSC website required eID, which can only be acquired after a physical visit to the appropriate government department and could be subject to a lengthy process.

Also websites of competent authorities provide users support services, including email service, and FAQ sections.

2.4 Overall quality of PSC services for users from other countries

2.4.1 Language support

To enhance cross-border activities it is recommended that portals are available in the language(s) of neighboring countries or in one of the most commonly used languages.

As shown by Table 13, all information on the Maltese PSC Portal and on portals of competent authorities signposted is hosted in both Maltese and English; this going down to lowest level of information or data provided, including all available forms.

2.4.2 Finding the relevant information on applicable procedures

There is an initial drop-down menu providing access to general information on starting business in Malta, and a section on expatriates living in Malta (which does not provide specific guidance for businesses): by clicking on "businesses" on the EUGO logo, a list of sectors are specified.

As Table 14 shows, the portal does not provide a clear distinction for foreign businesses considering permanent (i.e. an establishment) and temporary trading.

2.4.3 Completing procedures electronically

As mentioned, cross-border visitors can only use the Maltese PSC portal substantially in the same way as Maltese users, as the legislative framework does not provide specific provisions. As mentioned, eIDs are necessary for using certain electronic services. Electronic identities issued in other Member States are not currently supported, and Maltese eIDs can only be issued to Maltese National ID Holders after registration in the designated offices in Valetta or Rabat. These provisions limit the availability of electronic services for foreign businesses, both in the establishment and in the temporary cross-border cases.

Table 14B confirms that the use of the site for the online submission of forms and documents is not possible. It also shows that cross-border identification is not available for foreign users, and that electronic signatures issued in other Member States are not currently supported. On this point, the PSC is thus not yet fully compliant with the Services Directive and the aforementioned Commission Decisions

3 Use and usability

Use and usability is examined through three criteria, which are considered separately below.

The overall ease of use and usability of the portal was examined by focus group participants (in Malta and in Italy) and e-Government experts. The nine focus group participants were people who are active in the three sectors covered by the study (architects, restaurants/catering, tourism). Usability was measured using the System Usability Scale (SUS) methodology, which uses an attitudinal scale where users are asked to respond to statements with a rating on a five-point (Lickert) scale of “Strongly Disagree” to “Strongly Agree”. SUS examines the efficiency, effectiveness and ease of use of the portal.

User satisfaction was also investigated using the Analysis of Web Application Requirements (AWARE) methodology. AWARE uses a similar Lickert based attitudinal scale to SUS. AWARE examines user satisfaction by examining users' views of various features of the portal; these include content, structure, navigation, presentation and user operation.

In addition, this chapter also looks at portal positioning, promotion and take-up by business users so far.

3.1 Task completion

3.1.1 Identifying the right procedures and finding appropriate information

A key role for the portal is to enable users to find appropriate procedural and regulatory requirements prior to starting a business or starting cross-border trading. Tables 15, 16 and 17 examine the ability of focus group participants to find the procedural requirements necessary to complete the six business scenarios. Focus group participants had 15 minutes using the portal to find the regulatory requirements and procedures required to complete the establishment and cross-border scenarios they examined.

Tables 15, 16 and 17 show that users succeeded in identifying the correct procedures in an acceptable number of cases. On average, 52% of procedures identified for the establishment scenarios were correctly selected. The best results were achieved in the Restaurant and Catering scenario (60% of procedures correctly identified); while the percentage of participants who answered correctly is lower for the travel scenario (54%), and the lower level is achieved by the architectural scenarios (42%).

Tables 19, 20, 21 and 22 show that there is a relatively moderate level of satisfaction with the information content provided by the PSC website, especially as ease of access to information is concerned. Most of the focus group participants suggested that there was so much information that they could not always find precisely what

was required; the use of clearer headings and sub-headings was suggested during discussions.

3.1.2 Completion of procedures

In general the focus group felt strongly that the Maltese site was brimming with information however was not well structured, daunting to the user and is in deep need of a better search facilities. One constraint to usability that was highlighted by focus group participants concerns the search area which does not have enough functionalities as well as a section containing key words and relevant definition.

Another criticism from experts was the lack of tracking tools. Improvements in that area would improve portal usability and user retention and reuse.

Table 18B shows that in general the expert assessment of the portal was below the average with respect to their counterparts in other Member States for several issues. The expert assessment of the portal was below the average for all the items included into the assessment, and well below the average for eID/ eSignature services for non-nationals, online payment tools, tracking ongoing procedures.

3.1.3 Comparison of results between national focus group and other focus group

In general, as shown by Tables 20 and 22, Italian users found the Maltese portal easier to use than their Maltese counterparts.

Table 22 in particular shows that with respect to several measures (for content, ease of finding information and completing procedures online, use presentation and navigation) Italian users expressed higher user satisfaction scores than their Maltese counterparts.

3.2 General usability and user satisfaction

Tables 23 and 24 examine usability using the SUS framework. It shows that users (experts) found the Maltese portal more difficult to use than their counterparts in other countries. The portal was found to be more difficult to use, less integrated and scenarios could not be completed in a very intuitive manner. The portal was considered to be more complex than others and cumbersome to use. The portal layout, graphics and consistency were also thought to be worse than counterparts in other countries⁵.

3.3 Accessibility

Several evaluation tools were used to examine portal accessibility and the extent to which the portal was usable by people of all abilities and disabilities.

⁵ The scores represent the views of focus group participants and experts in each country, they have not been 'standardised'. Thus whilst the table provides a comparison of results between countries an unusually optimistic or pessimistic group of assessors could influence comparative results.

Table 25 provides the number of errors preventing full accessibility found by two of the most commonly used accessibility tools. The lower the number of errors the better. The average number of errors for all tested portals is shown in the right hand column.

Overall the Maltese site has a relatively low level of accessibility. The most important result in terms of usability and accessibility is the W3C Markup Validator⁶. It assesses the html markup used in the web site and states whether any errors have occurred. In Malta there was a significantly higher than average level of errors of this type, with twelve times higher than the overall average being recorded (i.e. 154 against an average of 13).

Finally, accessibility was measured using the W3C CSS Validator⁷, which measures the degree to which web-sites adhere to web standards as regards cascading style sheets (CSS). CSS errors mean that information does not display correctly, or at all. For a website to be considered of good accessibility, the maximum number of errors should be 100. The Maltese portal performs reasonably well against this criterion, as only 4 errors are recorded, compared to an average of all portals involved in the study of 34).

3.4 Take-up, positioning and promotion

The PSC Portal managers in Malta were unable to furnish any information about numbers of visitors and users of the portal because the site is being hosted with a different agency (MITA), which did not provide the required information. The general consensus among the PSC staff was however that the use of the site is well below expectations.

Key PSC related phrases were examined in two search engines. It has to be remarked that the search was performed for each portal in the national language (Maltese and English, in the case of Malta). Table 26 shows that for Maltese key phrases such as Point of Single Contact (in Maltese, Punti ta' kuntatt wahdieni), eGovernment for business (E-gvern ghan-negozju), business start-up (Negozju tal-bidu) ranking is always within the top three results using both the engines. The same search carried out in English (official language of the country alongside Maltese) gave less favourable results, with the link to the EUGO website coming in the first page of results (in the top ten results, usually) and then redirecting to the Maltese portal.

Table 27 describes the focus group's recognition and awareness of aspects of governmental portals such as its affiliation with the EUGO network. This was fairly well known amongst the participants prior to the focus group, and recognition was in line with all States studied. The site was recognisable as an official portal due to its style, the content of 'My Gov pages' and '.gov.mt' URL. The use of the EUGO logo

⁶ <http://validator.w3.org/>

⁷ <http://jigsaw.w3.org/css-validator/>

was extensively used and all led to the EUGO web site. No direct links to the PSC websites of other Member States are provided.

4 Administration, organisation and back office enablers

This section examines the operational aspects that impact on the practical functioning of the portal activities. This includes the degree of back-office integration (i.e. the interplay between competent authorities responsible for specific procedures handled through the PSC and the portal itself); it investigates the degree of resource availability and it includes the overall e-Government readiness of a Member State, in particular as regards key technical enablers such as the ability to handle electronic IDs, e-signatures or e-payment means.

4.1 Back office integration and cooperation with competent authorities

For the portal to offer its services to businesses in an effective manner, it is vital that all competent authorities are closely connected to the portal. Without successful back-office integration, it would be challenging to ensure up-to-date information and electronic application forms are available in a coherent manner across the board. Secondly, providing the means to complete a wide array of electronic procedures through a single portal can potentially offer serious efficiency gains through a push towards a standardisation of relevant forms as well as the means to sign applications electronically and to submit application files.

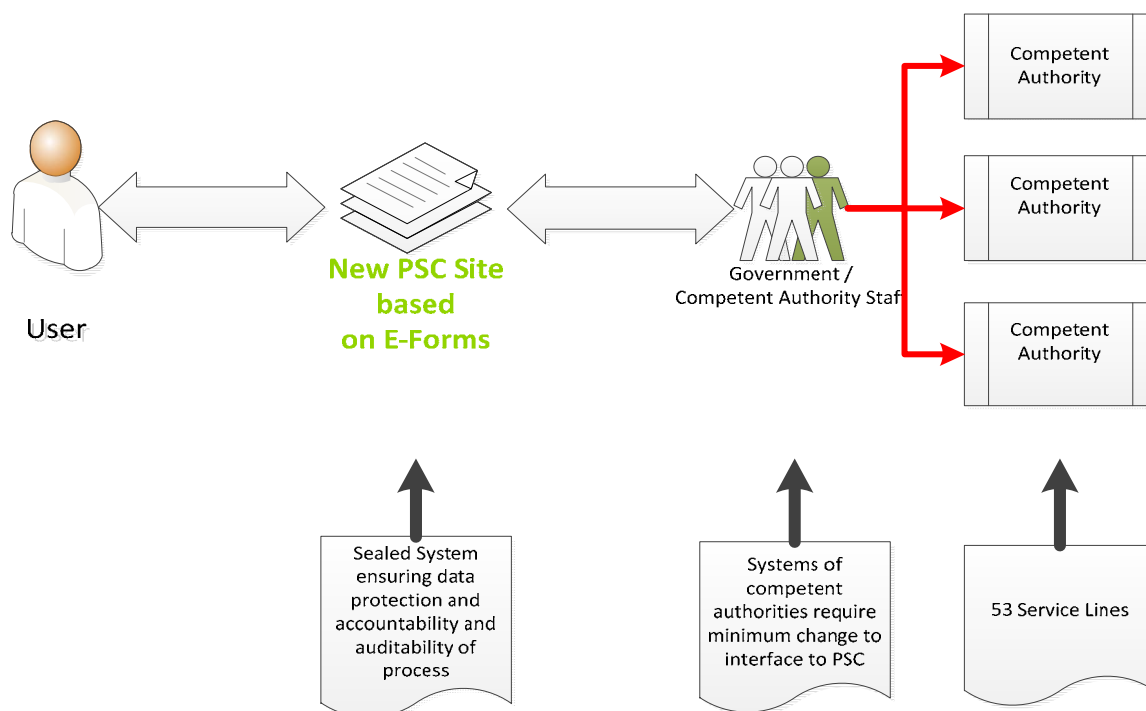
As Table 28 illustrates, the number of authorities dealing with the procedures offered through the portal amounts to 19, of which 11 are government agencies and the remaining 8 professional organisations.

The PSC Staff remarked that ever since they undertook the job to provide an information portal, whilst also acting as a signpost to other portals, they had to face several challenges. The most complex concerns the legislative framework. In fact, manual systems and procedures are in many cases embedded in the law. Therefore, implementation of electronic procedures in several cases requires a change in law, which obviously represents a big topic.

As states previously, the PSC acts as a gateway or signpost guiding users towards the websites of the competent authorities, leaving up to those how to implement online procedures.

Thanks to the Business Act, the PSC has the formal remit towards competent authorities to seek active cooperation. There are currently 19 Service Line agreements with other ministries and organisations, to ensure that the portal is maintained with updated and correct information and that requests coming in via the portal are acted upon efficiently and in a given timeframe. There is no automatic mechanism to update information of the PSC website; all changes have to be made manually.

As stated earlier in this report the new website (in development), which will complement the current portal, will ensure information reliability, and harmonious interaction between PSC site and competent authorities without involving heavy back office administration. An illustration of the envisaged mechanism is given below.



The new PSC portal has been created to be a sealed unit; i.e. the user interacts with it, and competent authorities refer to the same PSC portal for getting relevant information. Therefore no strong back-office integration is imposed.

Therefore the new site will:-

- Standardise the look and feel for the user, and avoid exposing the user to the myriad of different websites of the different authorities;
- Create a “sealed environment” ensuring that no documents are lost in transit and ensuring tracking of all exchanges;
- Creates a bridge between the user and the different system deployed by different authorities;
- Track and ensures that deliverables are met in time with the user.

4.2 Finance and resources

Information about the development and maintenance costs of the current Maltese PSC website or on the staff working on it was not available. Nevertheless the PSC managed acknowledged that the portal was adequately funded.

The running of the new PSC portal will probably require additional staff, estimated to be 5 to 6 full time persons or their equivalent by the PSC manager.

4.3 Status of key technical enablers (eID, e-signatures, e-payments)

Malta has quite strict views about the need of identification and signatures with a consistent drive towards proof of identity. Electronic identities and signatures are required to access several online procedures (such as those for company registration) and to submit documents.

eIDS are provided by the Ministry of Infrastructure, Transport and Communications. The procedure requires the applicant to physically visit a department of the Ministry in question in order to complete the application. This is subsequently followed up by an email where the user is given his/her eID number, an initial password (to be changed after the first access). A PIN code is also provided for the first access and for using the digital certificate. Electronic identity is thus provided only by log-in details, with no hardware support (such as smart cards or tokens). After activating their eID, users can download a digital certificate, which enables electronic signatures. The entire process does not require users to pay a fee. Malta has thus adopted a Public Key Infrastructure.

In order to access electronic services, therefore, Maltese citizens are required to obtain an eID. Users complained about the procedures for obtaining the eID, which is not automated and requires citizens to physically visit an eID office at least once. Moreover, a Maltese Identity card is needed for obtaining an eID. This precludes non-Maltese citizens (with domicile in Malta) the possibility to use electronic services. Electronic identities and signatures issued in other Member States are not supported.

The Value Added Tax department is currently the first and only government agency not to require E-IDs for new VAT Applications. The Agency is also currently reviewing its procedures with regard to other submissions (example recap statements), in order to consider the feasibility of a reduction (or even elimination) of eID for online administrative procedures.

No risk assessment was carried out by PSC about the use of eIDs and eSignatures for each procedure.

Currently Malta is not taking part to the STORK project, that aims at establishing a European eID Interoperability Platform. PSC staff has however remarked that they are closely following its developments, with a view of adopting it once implemented.

Electronic payments are currently not supported. However they will be when the new PSC portal will be fully operational.

5 Future Outlook

The immediate future goal for the PSC is the roll out of the second portal and its integration to the present portal. The online availability of the new portal will be accompanied by a marketing and awareness campaign to increase awareness about the portal and the possibility to execute online several administrative procedures. This should allow to reduce physical attendance of users to the various authorities, reaching a double purpose. On the one hand, public services will be more efficient; on the other hand, cost savings will be achieved, mainly arising from reduction in front-office administrative personnel.

6 Strengths, weaknesses and recommendations

The present portal has not in spirit reached the goals set out by the Services Directive and has only met the minimum expectations. Talks with the PSC team have revealed a request for more responsibilities and authority to implement the changes required (especially for the full deployment of the new portal). In their opinion, this will make reaching the goals of the Services Directive (and on the new PSC website) more realistic.

6.1.1 Availability and quality of PSC services

Expert analysis found that a number of the administrative requirements analysed through the scenarios can be completed online by Maltese nationals: however certain fundamentals were missing. In terms of information provision the portal goes slightly beyond the minimum legal requirements and also offers information on tax requirements and social security-related requirements a business has to fulfill.

Information provision is generally good but the quality of the search facility is lacking, which provides poor direction to access the information for business activities. This was a common feeling across all members of the focus group participants.

Discussions with portal staff highlighted the range of licenses available at the portal and the spread of more than 19 competent authorities across all tiers of government. Achieving integration across this range of authorities is a task still to be achieved.

However, at this point, without considering the second portal under construction, only a minimum of the tested procedures can be completed online. It is clear that more needs to be done to ensure the full online completion of administrative procedures through the portal. This may also require continuous efforts to bring on board those authorities not yet using the standardized tools available through the portal, thus ensuring a consistent service offering across the range of authorities and procedures.

Furthermore, it has been found out that making available more comprehensive amount of electronic procedures, both for Maltese nationals and for users from abroad (by reducing technical barriers and enabling the use of non-national means of eID and eSignature, where required) would enhance the use and the effectiveness of PSC.

6.2 Use and usability

Overall the use and usability of the Maltese PSC was perceived to be quite good. Key elements were thought to be:

- Information was thought to be complete but not well structured;

- The language used avoided being overly technical making it simple for ordinary users to understand.
- It achieves its role in providing a one-stop source for information and services.
- Fails to deliver a genuine online service across Malta but provides an excellent opportunity for all competent authorities to provide electronic service via this portal.

Nonetheless, experts and focus group participants suggested some areas for improvement. These included:-

- The search facilities in the portal requires a radical overhaul;
- The adoption of intuitive wizards to enable the user to answer a set of questions that would in turn provide the user with a complete answer of all his requirements in terms of fiscal and licensing requirements;
- Shorter and more succinct forms for some services;
- Reduction in amount of text and avoid use of small fonts. Use larger text and use clearer headings and sub-headings;
- Better linkage to external portals;
- An alternative to E-ID and e-signatures (both regarding the case it is necessary to ask for it and measures related to foreigners that do not have access to these tools;
- Video tutorials to help users to better understand the portal.

6.3 Administration, organisation and back office enablers

The current level of cooperation with competent authorities was reported to be good, even described to be enthusiastic at times. However change was perceived to be slow especially in view of the problem referred to earlier arising out of local legislation. MITA is the agency and primary change enabler and has the expertise to achieve the goals however government bureaucracy is perceived to be the main showstopper.

The full deployment of the new PSC portal will represent a notable progress, as it will allow users to interact with only one website to complete online the available procedures, while not imposing re-organisation challenges to competent authorities. This should allow a smooth transition to the new system, and a higher take-up and retention of users.

As mentioned, online procedures make an extensive use of electronic identification and signatures. The procedures for obtaining those features are not automatic, which has been remarked by users. A simplification of the procedure, eliminating the

necessity for a physical visit to the offices of the Ministry for Transport and Communication, would probably be well praised.

eIDs and eSignatures issued in other Member States are not supported, and it would be advisable that Malta should use all available technical solutions in order to handle official eID and eSignatures issued also in other countries. However, the Maltese PSC is closely monitoring the progresses of the STORK project, with a view of adopting the solutions, once developed.

The full deployment of the new portal will also allow online payments, like credit card and online transfers.

The setting up of the PSC will be the tools to push for further simplification and standardisation, increasing the cooperation between local authorities towards standardised forms for the most important procedures: relationship between competent authorities and the PSC should become less cumbersome, especially regarding situations where competent authorities may ask for documents.