

Policy Brief

Help Where It's Most Needed

How Leading Administrations are Using
'Proactive Public-Service Delivery' to Aid Citizens



By Grace Milne, Chrysoula Mitta and David Osimo



About the UserCentriCities consortium

This policy brief builds on the research created for UserCentriCities, a 27-partner consortium co-financed by the European Union. The consortium includes Eurocities, the IE Centre for C-Centricity (Spain), the Lisbon Council, VTT Technical Research Centre (Finland) and 23 leading cities and regions (Arezzo, Barcelona, Brussels Capital Region, Catalonia, Emilia Romagna Region, Espoo, Ghent, Glasgow, Gothenburg, Helsinki, Kronoberg Region, Kyiv, Lisbon, Ljubljana, Madrid, Mataró, Milan, Murcia, Paris, Porto, Riga, Rotterdam and Tallinn). The project received co-funding from the European Union's Horizon 2020 research and innovation programme under grant agreement 101004603. For more, visit <https://www.usercentricities.eu/>.

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We live in troubled times. The concatenation of the pandemic, the energy crisis and the Ukraine war have stretched the moral and financial resources of European citizens. Long-standing stagnation in wages and a rise in inequality have fomented a surge of populist movements in Western countries.

Governments have stepped up to the challenge and decided to move in with unprecedented interventions to help their citizens, such as the trillions-of-dollars pandemic intervention in the United States, the NextGenerationEU instrument that allows the European Union to raise money directly on capital markets and the direct financial help to citizens during the pandemic.¹

But these bold political choices do not always translate into direct benefits to the citizens that most need it. Recent studies estimate that between 30% to 70% of social protection beneficiaries across the EU do not collect the social benefits they are entitled to, and

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worryingly, those most in need are more likely to miss out.² Many benefits simply go undistributed because the beneficiary didn’t know they were entitled to them or the process for accessing the benefit was too cumbersome or fraught with social stigma. Digitising these services can make them easier to use for many citizens, but does not remove the fundamental barriers for the most vulnerable.

For this reason, the most advanced administrations are starting to go one step further by automatically providing citizens with the benefits they need based on the data the government holds. Such “proactive services” are provided without the citizen having to fill out a form or take any action. This is what Portugal did for supporting the rising energy costs for the poorest. The government automatically provided help based on revenue and social benefit data already held by the government. As a result, the number of beneficiary households increased to 812,680 in 2018, up ten-fold from 73,550 in 2011. In the future, digital services could go even further by predicting problems and intervening before they occur – for instance in detecting people falling through the social safety nets – just as precision-agriculture algorithms anticipate which plants need fertilizers or additional watering before it’s too late to intervene.

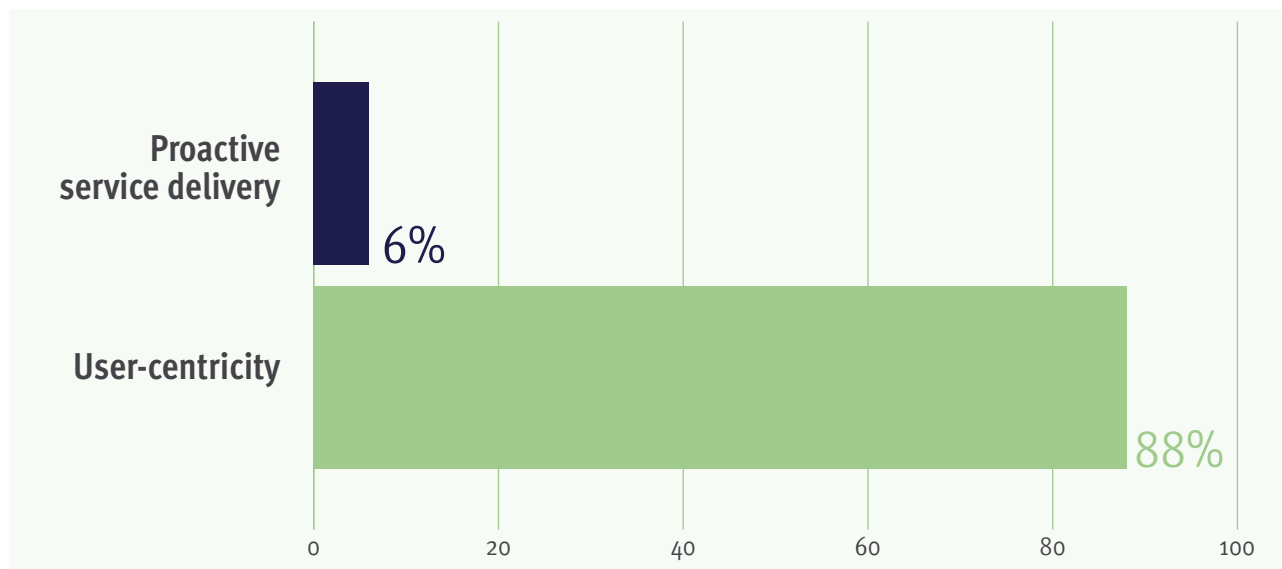
Services of this type exist, but they remain the exception. In a recent survey of government service delivery agencies, Capgemini rated the level of proactive service delivery at 6% of the total services on offer, against an 88% average rating for services that qualified as “user-centric,” which, in Capgemini’s definition, mostly means the service is available to users online.³

1 See Melissa Eddy, “Coronavirus Aid Flows Quickly to Berlin’s Self-Employed,” *The New York Times*, 03 April 2020.

2 See Tim Goedemé and Julie Janssens, *The Concept and Measurement of Non-Take-Up*. (Leuven: InGRID-2 project, 2020); Hans Dubois and Anna Ludwinek, *Access to Benefits* Working Paper (Dublin: European Foundation for the Improvement of Living and Working Conditions, 2014); Manos Matsaganis, Erhan Ozdemir and Terry Ward, *The Coverage Rate of Social Benefits*, Research note 9/2013, (Brussels: European Commission, 2014).

3 See Capgemini, *eGovernment Benchmark 2022: Synchronising Digital Governments* (Brussels: European Commission, 2022).

Chart 1. EU Average Score on User-Centricity and Proactive Service Delivery



Source: Capgemini

Agencies offer several reasons for not embracing this new way of doing things – some more justified than others. They say the data has insufficient quality, there is a lack of interoperability between different databases and laws requiring citizens to submit formal applications to obtain benefits pose real barriers. Data protection is also often mentioned and frequently offered as an excuse for inaction. Proactive registration also entails additional spending, as the percentage of people gathering benefits can go up.

‘Data protection is also often mentioned and frequently offered as an excuse for inaction.’

This policy brief will explore the concept of proactive digital services, how they can be delivered, what the obstacles are and how those obstacles can be overcome. It is based on a literature review, a series of structured interviews, workshops and three case studies (Portugal, Helsinki and Catalonia Region). It concludes with a call for making proactive service delivery the new flagship goal of digital-government transformation and offers eight policy recommendations.

What is ‘Proactive’ Public-Service Delivery?

When well designed, public spending can be a key tool to limit the impact of crises on European citizens. For instance, recent research from the Parliamentary Budget Office of Italy shows that government intervention in 2021-2022 managed to minimize the impact of inflation (7.1% in the period) to a mere 3.7% increase in expenditure for the overall population, with the poorest decile benefiting the most (only 1.3% increase).⁴

⁴ Ufficio Parlamentare di Bilancio, *Gli Effetti Distributivi dell’Aumento dei Prezzi e delle Misure di Sostegno in Favore delle Famiglie*, Flash 2/2022.

However, such effective targeting is not the rule. In particular, social assistance programmes show high levels of non-take-up, with the gap between entitlement and actual uptake of social benefits (based on the most conservative estimates) estimated between 30% and 70%. For instance, a meta-review conducted by the European Foundation for the Improvement of Living and Working Conditions found that in half of the reported cases, the majority of citizens entitled to a benefit did not receive it, with gaps of 70% in Ireland, 57% in Belgium and 47% in the United Kingdom.⁵ See Table 1 below.

Table 1. Gaps in Social-Benefit Take-Up in Selected Countries

Country	Benefit	Gap
Belgium	Guaranteed income 2007	57%
United Kingdom	Family credit 2002	47%
Czech Republic	Material need benefit 2010/2011	72%
Germany	Social assistance 2007	46%
Ireland	Family income supplement 2005	70%

Source: Eurofound

Moreover, studies have shown that such barriers to uptake “disproportionally affect citizens with low socio-economic status and demographic groups already suffering from other types of discrimination.”⁶ It has, in other words, a perverse effect of reinforcing inequality by rewarding those who can best navigate the process rather than those who most need it. The reasons are well known. The less-well-off segments of the population are at higher

‘Barriers have a perverse effect of reinforcing inequality by rewarding those who can best navigate the process rather than those who most need it.’

risk of cognitive scarcity, which limits their capacity to overcome the administrative burdens as it “imposes a kind of ‘bandwidth tax’ that impairs people’s ability to perform well.”⁷ Forms and documents become an unsurmountable barrier to uptake and the digital channel often becomes an additional barrier. In addition, claiming a benefit sometimes carries a social stigma that discourages claimants.⁸

5 The gap is the ratio of entitled people who do not receive the benefit as a proportion of the total number of entitled people. See Hans Dubois and Anna Ludwinek, *Access to Benefits*, Working Paper, (Dublin: Eurofound, 2014) and Tim Goedemé and Julie Janssens, *The Concept and Measurement of Non-Take-Up* (Leuven: InGRID-2 project, 2020).

6 Manos Matsaganis, Erhan Ozdemir and Terry Ward, *The Coverage Rate of Social Benefits*, Research Note 09/2013 (Brussels: European Commission, 2014); See also Karl Kristian Larsson, “Digitization or Equality: When Government Automation Covers Some, but Not All Citizens,” *Government Information Quarterly*, Volume 38, Issue 1, 2021.

7 Cass R. Sunstein, *Sludge* (Boston: MIT Press, 2021).

8 Julian Christensen, Lene Aarøe, Martin Baekgaard, Pamela Herd and Donald P. Moynihan, “Human Capital and Administrative Burden: The Role of Cognitive Resources in Citizen-State Interactions,” *Public Administration Review*, Jan-Feb 2020.

This is not just a problem of social justice; it is also a problem of economic efficiency. Low uptake generated by bad administration goes together with high take-up by people who are not entitled to the benefits in the first place. For instance, research on Greek social security showed that “high rates of non-take up coexist with high rates of ‘overpayment.’”⁹

Digital government has long promised to make public services more accessible and centred on users. For instance, during the pandemic citizens in Italy could claim financial help immediately through IO, the government app.¹⁰ But, while the process of gaining service through the app was much easier for most citizens, it still required an action from citizens, which might seem trivial to most readers, but is a substantial barrier for vulnerable groups.

‘Digital government has long promised to make public services more accessible and centred on users.’

This is why since 2018 there’s been an increasing move from making services available online and simpler to use towards new, proactive forms of service delivery that do not require any active role of citizens at all. Some scholars describe this as a switch from “one-stop shop” to a “no-stop shop” where services become invisible to users and benefits are provided in a seamless way across government to those that are entitled.¹¹ It is, in other words, the ultimate achievement of the long-standing once-only principle, where citizens are not required to submit government information that the government already holds on them.¹²

How proactive services work

Proactive service delivery is not *per se* a new thing. Most governments in the EU already automatically deduct taxes from employees. Pensions are often paid automatically. And others provide pre-filled forms, for instance for tax declarations. But very few apply these principles to the provision of social protection and related services – services that genuinely help vulnerable citizens.

Capgemini assigns a 6% score to its benchmarking estimate of the number of European Union digital government services that could be classified as “proactive.”¹³ Only three cities among the 23 city or regional partners of UserCentriCities – the 27-member consortium which produced this policy brief – report that they have a “proactive” service on offer to their citizens. And existing cases are often limited to pre-filled forms or automatic notifications across government agencies – rather than fully proactive services that automatically deliver help to citizens. In fact, proactive services can take different shapes, as indicated in Table 2 on page eight.

9 See Manos Matsaganis, Horacio Levy and Maria Flevotomou, “Non-Take Up of Social Benefits in Greece and Spain,” *Social Policy and Administration*, Vol. 44, No. 7, 2010.

10 The app was released in April 2020 on various app store and has become the main channel to obtain government support through the pandemic. For more information, visit <https://io.italia.it/>.

11 See Hendrik Scholta, Willem Mertens, Marek Kowalkiewicz and Jörg Becker, “From One-Stop Shop to No-Stop Shop: An E-Government Stage Model,” *Government Information Quarterly* 36.1, 2019.

12 Ibid.

13 See Cap Gemini, *op cit*.

While the practice is still not widespread, there are several examples of proactive service delivery taking shape in important capitals and regions in Europe. Estonia, for one, has made proactive service delivery the main goal of the information society strategy 2020.

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Elsewhere, the most common proactive service is child benefits: countries such as Austria and Norway (as well as Estonia) pay child benefits automatically as soon as a child is registered. This is a relatively simple service because it is entirely rights-based and not means-tested. It does not require crossing different databases (such as the population registry and or revenue database).

The following section provides a deep dive into how proactive services were implemented in three different contexts:

- The social energy tariff in Portugal
- University scholarships in Catalonia Region
- The enrolment of children in pre-primary education in Helsinki

Table 2. Typology of Proactive Services

Service	Role of citizens	Example	Level of Proactivity
Automatic notification across agencies	Citizens access service once without needing multiple contacts	Bulgaria: automatically sign out from the previous municipality when moving places	Not proactive
Pre-filled forms	Citizens validate the request for service	Catalonia: university scholarships	Partially proactive
Automatic delivery of rights-based services	Citizens fully receive the benefit automatically as life event happens	Helsinki: enrolment in childcare	Fully proactive
Automatic delivery of rights-based and means-tested services	Citizens fully receive the benefit automatically as life event happens	Portugal: social energy tariff	Fully proactive
Predictive provision of support and help by identification of at-risk factors	Citizens receive help before a negative event happens	Pilots such as STOP: Suicide prevenTion in sOCial Platforms	Fully proactive and predictive

Original Source: Nitesh Bharosa, Bas Oude Luttighuis, Flori Spoelstra, Haiko van der Voort and Marijn Janssen, “Inclusion through Proactive Public Services: Findings from the Netherlands: Classifying and Designing Proactivity through Understanding Service Eligibility and Delivery Processes” in Jooho Lee, Gabriela Viale Pereira and Sungsoo Hwang (eds.), *Proceedings of the 22nd Annual International Conference on Digital Government Research: Digital Innovations for Public Values: Inclusive Collaboration and Community*, Association for Computing Machinery, 2021. The framework has been modified for this table.

Case Studies

Portugal: the Automated Social Energy Tariff

Portugal has a strong focus on embedding interoperability and innovation in its provision of public services. The Administration Modernisation Agency (AMA) is the government entity dedicated to, among others, fostering the adoption of building blocks for high-quality digital public services in Portugal. One of these building blocks is the *Interoperabilidade na Administração Pública* (iAP), developed in 2007, which among other features provides an integration platform that works to facilitate data-sharing across government agencies allowing them to better respond to civil-society demand with open standards, high security, reliability and delivery, to increase government efficiency.

The automated social energy tariff (ASET) is one of the proactive services realised through the iAP platform. This service is ensured by the directorate-general for energy and geology (DGEG), using AMA's public administration interoperability platform to ensure that people living in Portugal from low-income groups receive a discount on their energy bills without having to apply for it themselves. The Portuguese government has provided such a service since 2010 but the programme struggled with low uptake: entitled citizens were either put off by the administrative requirements or simply unaware of the discounts. In 2016, the ASET came into being. There was strong political will underpinning this service, with high-level political meetings taking place to create the necessary legal frameworks and to switch the tariff responsibility away from energy companies to the state.

‘The General Data Protection Regulation takes a prominent place in the discussion and is often used as an argument against innovation. The reality is more nuanced.’

To automatically treat about four million records from different energy suppliers, an information system was developed by the DGEG to communicate with the tax authority and the social security systems. iAP's integration platform then acts as a central interoperability node with a catalogue of web services, which can be used by DGEG and the social security and tax authority to cross-check information.

In the end, only binary information is sent every month to the energy suppliers as to whether a citizen will receive the social energy tariff. The effect of automation was swift and extreme: the ASET increased the number of beneficiaries for those using electricity by 283% and by 73% for those using natural gas. By automating the eligibility check, the Portuguese government simultaneously eliminated any administrative burden from its citizens and ensured that those who are entitled to the tariff will receive it, regardless of whether they know about it or not.¹⁴

¹⁴ Rita Martins, Patrícia Pereira da Silva, Micaela Antunes and Adelino Fortunato, *Study on the Application of the Social Energy Tariff in Portugal* (Coimbra: Portuguese Energy Observatory and Centre for Business and Economic Research, 2019).

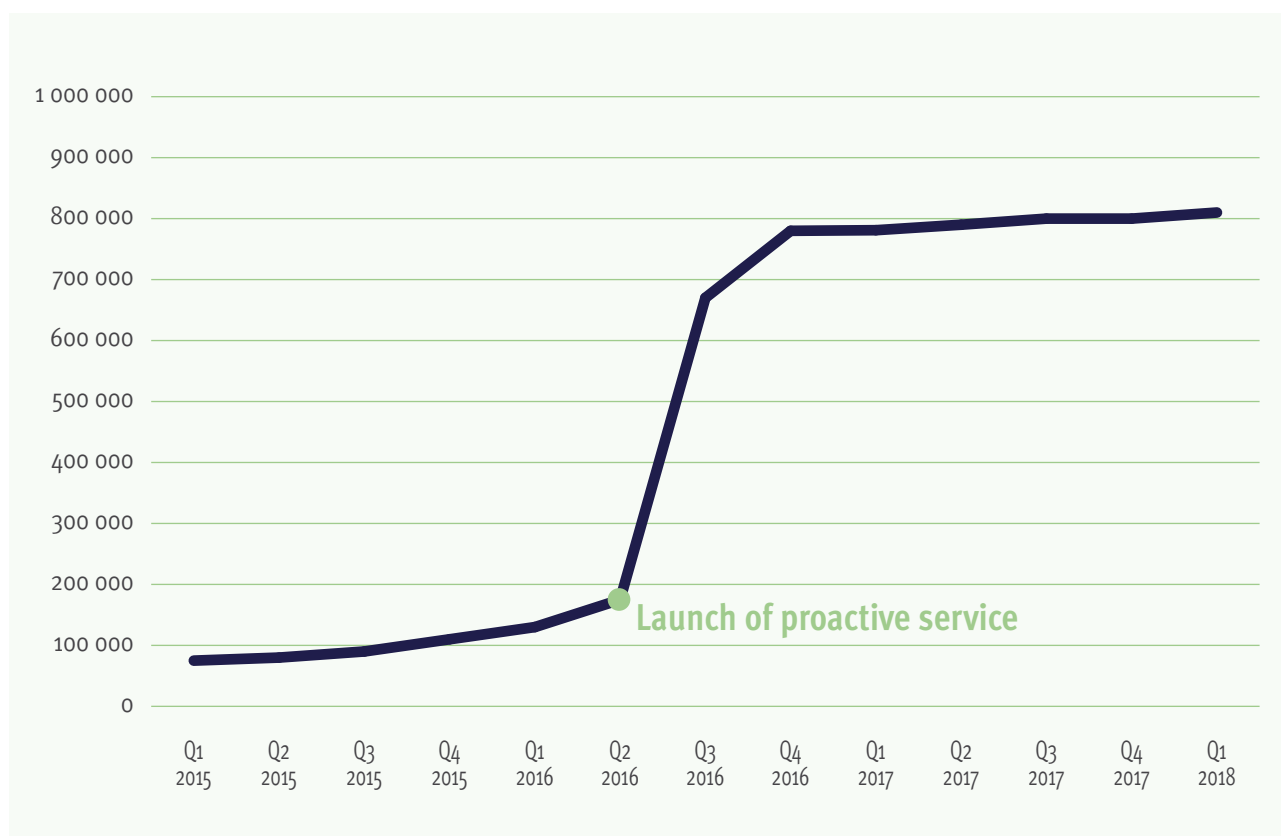
Despite the success, the project had to overcome several barriers. While delivering the ASET, Portuguese authorities ensured the services aligned with national and European laws and regulations on data protection. While the General Data Protection Regulation (GDPR) came into force in Portugal in 2018, and the ASET had already been introduced in 2016, any associated data processing activity was nonetheless subject to GDPR compliance, as the data processing was necessary to fulfil a public interest such as a governmental legal

‘Government services based on poor-quality data lead to service failures and bad policy decisions.’

obligation. But the most important barrier was the complex governance of a service that involves several departments and ministries, as well as external private providers. The complexity was overcome mainly thanks to the direct involvement and commitment of the highest levels of government.

Embedding proactivity in this service increased the number of beneficiaries to 820,000, up from 150,000. And in 2020, the ASET was awarded a high distinction for the United Nations Public Service Award in the category of “delivering inclusive and equitable public services for all.”¹⁵

Chart 2. Total Number of Beneficiaries of the Social Electricity Tariffs in Portugal



Source: Observatorio da Energia

¹⁵ See Directorate-General for Energy and Geology, “Tarifa Social De Energia Automática,” *Recebe Distinção Mundial*, December 2021; and United Nations Public Service Innovation Hub, *ASET - Automatic Social Energy Tariff*, 2020.

Helsinki: Proactive Pre-Primary Education Placements

As the winner of [The 2022 UserCentriCities Award](#), Helsinki is no stranger to the provision of proactive government services. In 2021, the City of Helsinki started offering parents pre-primary education placements through text messages, which the parents can then accept by responding to the message. This city service is offered through Asti – the city of Helsinki’s digital platform for hosting online services – which has been developed as part of the city’s digitalisation programme.¹⁶ There is no longer a need for parents to complete a paper-based application or online form to secure pre-primary placement for their children. The service kicked off in 2020 with a pilot in three areas of Helsinki involving more than 1,000 families. By the beginning of 2021, the pilot grew to cover the entire Helsinki region. Almost 6,000 families in Helsinki received text messages as part of the expanded pilot. The response rate and acceptance rates were both high: 93% and 89%, respectively. The time saved between parents receiving confirmations for traditional versus proactive services was also considerable: children's enrolments were confirmed within one minute through the new service. Previously this confirmation took up to two months through the traditional, form-based process.¹⁷

Despite its success, this service faced several barriers in its transition to proactivity. According to Helsinki Chief Digital Officer Mikko Rusama, the city first had to establish whether the data they already had was correct and if they had the right to use this data to proactively reach out to parents. They were faced with a complex balance between adhering to GDPR requirements as well as their legal obligations to provide childcare services to their citizens. As described in the Portugal case study, Article 6 of the GDPR permits data processing without explicit consent if the purpose is – among others – to fulfil a government legal obligation or to facilitate essential public services.¹⁸ In Finland, it is mandatory for children to attend one year of pre-primary education in the year they turn six. Therefore, within the context of GDPR, a legal basis for offering the service proactively had been established. Mikko Rusama described how using a text message to communicate with citizens was simply a new form of communication between the City of Helsinki and its citizens. To further manage questions of citizen consent, the city has adopted principles developed by MyData, the award-winning non-governmental organisation that “furthers the rights of individuals over their personal data,” to ensure that people have oversight and better control over their data.¹⁹

‘If the quality of the data feeding into government decisions is poor, the targeting of the service or benefit will also be poor.’

16 City of Helsinki, “‘Can This Really Be This Easy?’ Offering Pre-Primary Education Places Proactively Receives Best User-Centric Service Award,” 21 June 2022.

17 Mikko Rusama, “The Most Functional City in the World is Transforming: From Reactive to Proactive City on Peoples’ Terms,” *World Bank Virtual Knowledge Exchange: Smart Cities for Sustainable Development*, 04 May 2021.

18 European Commission, *Recommendations for Organising and Governing Integrated Public Services: Report and Annexes* (Luxembourg: European Commission, 2020).

19 For more, visit <https://www.mydata.org/>.

The technical implementation was straightforward. The city opted not to start from scratch by building an entirely new platform to accommodate the service. A simple SMS service was implemented and the service was piloted in three areas of Helsinki. Following the success of the pilot, the city rapidly scaled up this service to cover the entire Helsinki region. The advantage of using a pilot scheme was that authorities were able to test how the initiative performed in a smaller area before upscaling it to a larger area.

The City of Helsinki is looking to the future and is dedicated to two major paradigm shifts in how they provide services to citizens: firstly, moving from reactive to proactive service delivery, and secondly, moving to a human-centric use of data, avoiding tailored services based on analytics of the data they have but pro-actively using that data to deliver customised services in a citizen-centric way. The City of Helsinki plans to expand the portfolio of proactive and predictive services, for example, to manage other educational enrolments.²⁰

Catalonia Region: Pre-Filled Forms for University Grants Applications

Proactive public services have been part of Catalonia Region's digital government strategy since 2019. For the past three years, the region has been experimenting with data-driven innovation to identify the needs of its citizens. A successful example of this is its introduction of a service in 2021 that proactively informs and pre-fills forms for students applying for university grants. However, success was not instant and the region was faced with several challenges when designing and developing this kind of service.²¹

'Proactive services are based on the seamless integration of data held by the government, such as income, civil-registry and social-benefits data.'

First, data silos were a significant problem for Catalonia Region's government. Regional officers did not have access to data held by different departments or portals for procedures started in paper format. Correlations between procedures

started by citizens were also invisible to the region when services were shared between other layers of government, thus creating holes in the data. But even against this background and with the help of big data analysis, the region identified the opportunity to improve university grant applications by enabling form pre-filling and offering the service proactively to students. The service also offers an alert to eligible students to apply for annual university grants as well as a pre-filled form with all the data they had provided the year before. For the service to work, the person must be digitally identified through systems such as idCATmòbil, the Catalonia region's citizen easy-to-use authentication and electronic signature service. Users can register to use idCATmòbil online or by video identification, with no need to visit a government office in person. Users will then view their application and as a result of the proactive form-filling, there is no need for them to populate the form: their responsibility is just to submit it.²²

²⁰ Digital Helsinki, *Project: Kindergarten Place via SMS*, 2022.

²¹ Government of Catalonia, "Es Posa En Marxa La Identificació Digital Per Obtenir L'acreditació Que Permet Matricular-Se A La Universitat Com A Estudiant A L'espera D'obtenir Una Beca," 07 July 2021.

²² Government of Catalonia, "La Generalitat Comença A Implantar Un Model De Tramitació Digital Proactiu," 13 July 2021.

The service is not therefore fully proactive because of legal obligations and challenges related to data quality. According to Spanish law, every application must be signed by the user and the risk of data imperfections is still present. For the design of the service and to comply with privacy rules, the region needed to ask for consent to send the related alert and reuse the data from the previous application. For this purpose, a centralised consent register was built and made available in each citizen's private folder in the region's portal.

‘Interoperability of public-sector information systems is necessary for proactive services to work.’

While the centralised system provided the advantage that citizens could visit it and review the consents they had provided in the past at any time, it proved difficult to reach students since it was too many clicks away from the application form. Therefore, in 2022, the consent form will be added to the very same application form and not in a different system. In 2021, the first year that the service was provided, the region's education department received 54,000 fully electronic requests and is expected to receive 200,000 applications when other grants are added to the system.²³ Although it anticipates the needs of citizens and has significantly simplified the application procedure, the service still requires the submission of the form by the students. Based on the experience in designing this service, the region has plans to offer more services proactively in the near future, based on a “new model of digital processing.”

The Key Factors, Perceived and Real

Based on the case studies and an accompanying literature review, five key factors are necessary to deliver good, effective, well-targeted proactive services:

- 1) Data protection
- 2) Data quality
- 3) Digital-ready policy
- 4) Interoperability
- 5) Governance

Data protection

Whenever data-driven innovation is discussed, the GDPR takes a prominent place in the discussion and is often used as an argument against innovation. The reality is more nuanced. GDPR allows six bases for data processing, but too often the focus is only on the consent of the data subject. Of course, there is a contradiction in nature between explicit consent and proactive services: if it is necessary to obtain citizens' consent to process their data for proactive service delivery, then by definition the services can't be automatic. But GDPR

²³ Digital Administration of the Government of Catalonia, “Prova Pilot Beques Equitat: Projecte per Assumir el Traspàs de la Gestió de les Beques i Posada en Marxa dels Tràmits Proactius – Francesc Xavier Buendia i Imma Triadó,” 10 December 2021.

allows personal data processing also for reasons of public interest: if governments have a legal obligation to perform a particular service to their citizens – such as providing citizens with child-care options or affordable and accessible energy – processing personal data is allowed. And social protection is repeatedly mentioned in the regulation as a case in point.²⁴

‘Key benefits for vulnerable groups should be made automatic by default by 2030.’

But this is not to confuse data processing possibilities with an idea that government workers can tap into citizens’ data on a whim. Transparency in data sharing and reuse is important and the use and reuse of personal data must be for legitimate purposes. For example, the Estonian government operates

a data tracker where citizens can review what their data has been used for and who has accessed it.²⁵ The Portuguese government in accordance with the principle of data minimisation only shares with energy providers the information on whether the household is eligible or not, without sharing the full income data.

Such provisions are highly useful in addressing any reservations citizens may have regarding data privacy and increasing public sector trust. And some governments simply embrace the political choice to extend consent much more widely than GDPR requires.²⁶

Potential barriers such as GDPR are often cited by governments as the main reason for not delivering proactive public services. Yet, as the case studies here show, GDPR requirements do not prevent digital innovation. The Portuguese Government and the City of Helsinki were able to deliver their services completely proactively because their services were based on a legal obligation. On the other hand, in cases where the legal obligation is not clear, such as some new experimental services, it is more difficult for the government to claim public interest as a legal basis.

Data quality

Data quality relates to how complete, accurate, up-to-date and therefore useful is the data stored by governments. Poor data quality can take the form of missing data types and values, lack of updates, poor accessibility and non-compliance with data quality standards.²⁷ To provide services proactively, governments need to draw together datasets – often from different departments or agencies – that establish whether an individual or business is eligible or ineligible to receive it. Government services based on poor-quality data lead to service failures and bad policy decisions. Moreover, if the quality of the data feeding into government decisions is poor, the targeting of the service or benefit will also be poor. Consequences could range from the service not being offered to those who are entitled to

²⁴ Hendrik Scholta and Ida Lindgren, “The Long and Winding Road of Digital Public Services - One Next Step: Proactivity,” *Fortieth International Conference on Information Systems Proceedings* 7, 2019.

²⁵ For more on Estonia’s data tracker, visit <https://www.eesti.ee/en/security-and-defense/safety-and-security/usage-of-personal-data>.

²⁶ Morten Meyerhoff Nielsen and Robert Krimmer, “Reuse of Data for Personal and Proactive Service: An Opportunity Not Yet Utilised,” *Conference for eDemocracy and Open Government* 273 (2015).

²⁷ European Commission, *Data.europa.eu Data Quality Guidelines* (Luxembourg: Publications Office of the European Union, 2021).

benefit from it because the data is inaccurate or otherwise not up-to-date, to people receiving a service that they are not entitled to.

Many public agencies do not trust the data they hold, and often with good reason, hence they are reluctant to develop fully proactive services. This was also a barrier in the Catalan Region case. The interaction with the citizens becomes then a necessary quality check for the data. Only when base registries are consolidated and high quality, proactive services become possible. In this sense, proactive services are typically the result of a long-term investment in high-quality base registries and interoperability. This barrier was present in Helsinki's pre-primary education allocation example. In this case, before transitioning its service from traditional to proactive, it first had to establish whether its data was correct or not. This was a crucial step to ensure that they had the correct details for parents and whether their children needed a place in school.

Data quality is certainly an important obstacle to proactive service delivery, but it should not be a reason not to implement it. Data on no uptake of social benefits show that the traditional, reactive system is not effective either. And poor data quality leads to poor spending in any case, whether the service is proactive or not.

Interoperability

Proactive services are based on the seamless integration of data held by the government, such as income, civil-registry and social-benefits data. Therefore, interoperability of public-sector information systems is necessary for proactive services to work. The success stories such as Estonia and Portugal are the result of a long-standing commitment and investment into interoperability. Proactive services can be considered the ultimate visible benefit of effective interoperability.

Another crucial aspect that Estonia and Portugal share is the adoption of unique permanent identifiers such as tax numbers to identify citizens across different registries and therefore combine data from different sources while

preserving privacy (since the only information shared is whether or not they were eligible to receive the service). However, there is strong debate in Europe on the usage of unique identifiers: the proposed revision of the eIDAS directive with the new proposal for a Digital Identity Wallet included the use of persistent identifiers, but encountered resistance as countries such as Germany consider it risky from a data protection perspective.²⁸

‘A strong commitment from the top is a prerequisite for coordination to succeed and win the resistance of different departments, agencies and stakeholders.’

There is no doubt that persistent identifiers are important for delivering proactive services that help citizens. It is not an accident that perhaps the most well-known unique personal

²⁸ See European Commission, *Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 910/2014 as Regards Establishing a Framework for a European Digital Identity COM/2021/281*.

identifier, the United States' social security number, was introduced in the 1930s precisely to facilitate the process of pension payments. There might be other ways to do it, more privacy-oriented. But when looking at the services that are implemented already, that is the reality. And the ultimate result is that vulnerable citizens receive greater protection in countries that use persistent identifiers.

Digital-ready policies

Regulations and laws can sometimes hinder digital innovation. In this case, laws sometimes include seemingly innocuous sentences such as requiring citizens to request a benefit or to sign a document, thereby making it impossible to deliver fully proactive services. Having out-of-date legislation is what prevented Catalonia from making its university grants service fully proactive: the law required the region to gain citizens' signatures to enact the service. Meanwhile, Portugal had political support for making the social energy tariff proactive and therefore a legal framework was introduced that gave the Portuguese government the ability to automate the service. Old laws could very much have been an issue for Portugal's AMA during the ASET's development, but support from higher levels of politics early on in the process ensured that this was not the case. This can also happen for today's legislation: for this reason, [The 2020 Berlin Declaration on Digital Society and Value-Based Digital Government](#) emphasised the importance of digital-ready policies and legislation in digital government. The declaration called on European institutions to ensure that policies and legislation are digital-ready with interoperability at their core.

Joined-up governance

Providing proactive services requires the collaboration of different departments and entities, different institutional levels and even private-sector entities, from data sharing to executing the payment or the deduction. This complex governance can make it impossible to deliver the service and requires in any case major efforts of orchestration, as all cases confirm. The cases report that a strong commitment from the top is a prerequisite for such coordination

'Proactive benefits should be as prominent as the once-only principle in the digital government strategy.'

effort to succeed and win the resistance of different departments, agencies and stakeholders. Across the cases mentioned, political leadership was clear and strong and allowed for coordination to happen effectively across silos, which remains one of

the greatest governance challenges to achieving proactive services. Luckily, an endorsement from the top is relatively easy to achieve, because the political message is strong and understandable, and the expected results are visible. This is not a technical topic. It is about helping citizens.

Policy Recommendations

The main policy appeal running throughout this policy brief is that proactive public services should be the overarching flagship priority of digital-government services. On the one hand, this will provide clear visible advantages to citizens from digitalisation, in particular those that are more vulnerable economically and socially, in line with the new “human-centric” emphasis in digital government to address societal challenges. It also resonates with the vision spelled out by Ursula von der Leyen, president of the European Commission, in her 2022 State of the Union address, where she called for “a braver Union. Closer to its people in times of need. Bolder in responding to historic challenges and daily concerns of Europeans. And to walk at their side when they deal with the big trials of life.”²⁹

‘Ursula von der Leyen, president of the European Commission, in her 2022 State of the Union address, called for “a braver Union. Closer to its people in times of need.”’

On the other hand, proactive public services are an effective strategic goal to drive government transformation as a whole, at least as effective as “putting all services online” was in the early 2000s. Making services proactive implies putting order into the basic registries in terms of data quality and ensuring interoperability. In summary, it is a concrete, visible goal that citizens and politicians understand. And it has positive second-order effects that trickle down the whole digital government infrastructure.

Based on the case studies and a broad literature review, we propose eight policy recommendations.

1 Place proactive digital services at the centre of the European digital transformation agenda. The Berlin Declaration makes the case for human-centric digital government. But human-centric should be understood as actively helping citizens, not just protecting them from data infringement or algorithmic bias. And policy prioritisation is a necessary success factor across cases because it helps steer the governance process across departments and external agencies that need to be involved.

2 Define the flagship goal of making key social benefits for vulnerable groups automatic by default by 2030 and include it prominently in relevant policy agendas such as the European Union’s flagship *Digital Decade: Digital Targets for 2030* programme. Proactive benefits should be as prominent as the once-only principle in the digital government strategy. Governments should try, by default, to make all of the most important social benefits automatic or document why this is not possible and what steps are going to be implemented to make it possible. Besides being laudable in itself, this would create a strong leverage effect to improve data quality and interoperability of basic registries.

²⁹ Ursula von der Leyen, *State of the Union Address 2022*, (Brussels: European Commission, 2022).

3 Introduce measures to ensure that European, national and local legislation is not only digital-ready but also “proactive-ready” by eliminating the need for citizens to request a service in order to receive it from existing laws.³⁰ For example, Denmark has required that all Danish policies and laws be assessed for digital readiness before they are implemented.³¹ The Danish government has attributed complex legislation to be the key barrier to digital-ready policies and legislation and assessed new proposals based on seven principles to enable stronger digital capabilities in government.

4 Clarify that GDPR allows for proactive public services and how best to accommodate proactive services while guaranteeing full data protection for vulnerable users. GDPR remains a challenge for public administration well beyond the stated goals of the regulation and is often misinterpreted as “consent for everything.” Institutions such as the European Data Protection Board should clarify under what conditions proactive public services are compliant with GDPR.

5 Provide concrete support to data quality improvement. Digital government strategies and their implementation, including in the context of the recovery and resilience facility, cohesion policy and structural reform support, should dedicate resources to increase the quality of data, including for example audits on data quality and data-curation activities. These supporting initiatives should cut through all institutional levels, from local to national.

6 Strengthen the European Interoperability Framework. Interoperable base registries are necessary for proactive public services. The European Interoperability Framework has been an effective instrument to encourage interoperability at both the EU member state and local levels, but it should be given more “teeth” in its ongoing review to achieve far higher levels of operational enforcement.³² One way of doing this is by beefing up a forthcoming proposal – the new Interoperable Europe strategy – giving it the form of a “regulation” this time with direct effect in EU member states.³³

‘Governments across institutional levels should launch pilot initiatives on how to use data to improve the delivery of social services.’

There are also several important pistes that such a regulation could take. One notable avenue would be on permanent unique identifiers, which have emerged as a *sine qua non* of the most successful cases. Crucially, unique identifiers can help data protection by facilitating the validation of status

without the sharing of data – for instance allowing Portuguese energy providers to receive simply a verification of eligibility for the social tariff without having to show proof of income and thereby revealing much more sensible data. The Digital Identity Wallet proposal now being discussed at the European Parliament and the Council of the European Union and other

³⁰ Expert Group on the Interoperability of European Public Services, *Recommendations for the Next European Interoperability Policy* (Brussels: European Commission, 2022).

³¹ Agency for Digital Government Denmark, *Digital-Ready Legislation*, 2022.

³² European Commission, *European Interoperability Framework – Implementation Strategy* COM(2017) 134 final.

³³ For more, visit https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12579-Interoperable-digital-public-services-European-Interoperability-Framework-evaluation-strategy_en.

forthcoming proposals should include and accommodate more positive provisions for unique identifiers.

7 Launch data-driven pilots on solving societal challenges and share the lessons learned at the EU level. Governments across institutional levels should launch pilot initiatives on how to use data to improve the delivery of social services. The Netherlands, as part of its data strategy, launched pilots on energy efficiency, poverty and housing. These will serve as a demonstrator of the potential of proactive and predictive digital services.³⁴

8 Measure proactivity in European benchmarking. The benchmarking of eGovernment and indices like the European Union’s Digital Economy and Society Index remain a very influential soft policy tool for European eGovernment policy.³⁵ They should have a stronger focus on proactive services and raise the bar beyond the current definition of indicator by assessing proactive service provision across the key social benefits identified in Recommendation No. 2, such as child benefits, childcare provision and support to energy tariffs.

³⁴ For more information on the Dutch pilots, see Deloitte and Lisbon Council, *Study on Public Sector Data Strategies Policies and Governance* (Brussels: European Commission, 2020).

³⁵ For more on DESI, visit <https://digital-strategy.ec.europa.eu/en/policies/desi>.

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