

Citizens Information Board Submission to Digital Strategy Consultation (November 2018)

The Citizens Information Board welcomes the opportunity to respond to the public consultation on a new Digital Strategy for Ireland. The Board has also had the opportunity to contribute to Stakeholder Roundtable consultations hosted by the Department of the Taoiseach on the development of a framework for a national digital strategy.

As the national agency responsible for supporting the provision of information, advice and advocacy on public and social services, the Citizens Information Board has significant engagement with the public via online information provision www.citizensinformation.ie website and through funded face to face information, advice and advocacy services. In 2017, citizensinformation.ie received 19.8m visits and an average of more than 872,000 unique visitors per month. Almost 600,000 people use the national network of Citizens Information Services annually and services assist people with over a million queries on all aspects of rights and entitlements to public service provision. The Board also has a remit in relation to advocacy provision for people with disabilities and a social policy role to provide feedback on the effectiveness of current social policy and services and to highlight issues which are of concern to users of those services.

What are the most important areas the Strategy should focus on? (please pick a maximum of three) Digital Infrastructure; Trust, Security and Privacy; Inclusion and Wellbeing; Digital Public Services; Data Sharing; Innovation and Growth; Labour Market Changes; Education and Skills

Digital Public Services
Inclusion and Wellbeing;
Trust, Security, and Privacy

What are the main opportunities and challenges of digital transformation for Ireland

Digital technologies offer new solutions to societal challenges ranging from ageing populations to healthcare, to smart transport, security, energy and the environment. Transformation is a whole scale change to the foundational components of services and business from its operating model to its infrastructure. Digital transformation describes a series of digital projects that, together, change every aspect of how business is done and how services are delivered. A key point is that transformative change is made possible by digital technology - the technology is not the change in itself. So digital transformation doesn't just mean digitalising one part of a service or business – for digitalisation to work,

projects need to be linked together from the onset. This requires genuinely joined up operations at the back end and at the service delivery end.

Public services are increasingly provided online. This has many advantages, including efficient and cost-effective delivery of services, and ease of access for citizens and other users. However, reliance on online delivery of services may have the unintended consequence of reducing access to public services among low income groups, including older people, those with disabilities or with low levels of education, literacy or computer literacy. Examination of the nature of caller queries to Citizens Information Services suggests that a significant number of clients encountered barriers in accessing online services, or experienced difficulties in securing adequate public services or meeting their needs online.

Digital technologies can be used to implement change that improves public service quality, inclusiveness of services and internal public service efficiency. Digital public services can also reduce the administrative burden on citizens by making their interactions faster, more convenient and transparent and less expensive. The ideal service user experience is one that is cohesive, seamless, easy to use, trusted and provides flexible online transactional services (from access to jobseeker's benefits to applying for passports and driving licences online).

Rethinking and rebuilding the digital infrastructure of Ireland remains a key opportunity for growth as well as the most pressing challenge, without which other opportunities for e-government and commercial activity cannot be realised. Affordable connectivity across the State remains a crucial need, particularly in rural Ireland. The National Broadband Plan represents a significant forward step to connect even the most remote areas and homes of Ireland to high speed Internet.

However trust, privacy, and security cannot be separated from infrastructure development. Citizens will not rely on any services or infrastructures that are unstable, insecure. These areas represent potential for growth and development in citizen participation, cybersecurity, and literacy.

Open government data (OGD) is another area of potential growth for improving services for citizens (Fitzpatrick 2012). The government's data.gov.ie data portal for government data sets represents a potential source of opportunity that has not been well realised. Although data.gov.ie was launched in 2014 to provide a 'one stop' for open data sets for policy making, research, and commercialisation, more could be done to make the data usable and useful (Saez-Martin et al. 2016).

The Smart City movement is a significant area of existing engagement and future growth possibilities. Ireland already has a strong tradition of 'Smart cities' research and development which represents successful academic-commercial collaboration. Dublin and Cork are the most advanced in this arena with numerous top-down and citizen-driven initiatives to improve efficiencies in city services and transportation and foster growth in start-ups and SMEs (among many other goals). Because smart city projects have to be layered on top of existing physical and digital infrastructures, they can be difficult to harmonise, but represents opportunities for citizen engagement and commercial endeavours. However, the challenges in Smart City research and development are ethical and security issues. These include maintaining data privacy, equity of access to services, fostering citizen engagement and participation from a wide variety of participants.

Is there anything stopping citizens from using more digital technology in any aspect of life?

In many areas of Ireland, especially outside of Dublin, unreliable infrastructure remains a significant barrier to use. Statistics suggest that one of the main factors that is preventing more full participation in the information society is the uneven penetration of broadband across Ireland. Even though almost 90% of households in Ireland have an Internet connection¹ (CSO 2018), fixed broadband (as opposed to mobile data available on mobile phones) is only at 72% in the border and midlands regions. (ComReg 2017). There are many areas in Ireland without mobile data (according to ComReg, 17% of households in the Midlands reported that neither mobile nor fixed-point broadband is available). Businesses (especially those that rely heavily on digital infrastructure or want to recruit staff that can telecommute via broadband) cannot do so effectively in some areas of Ireland. More recently, the third quarter 2018 report from ComReg showed that almost half of Irish mobile subscribers have 4G connectivity via portable devices and that almost 75% of fixed broadband connections equal or exceed 30 Mbps (used mostly to transport data). While this seems like positive news as these numbers are incrementally higher than previous years, the news remains an urban story. Cities are not plagued with the 'last mile' problems that rural localities are, where one company owns the infrastructure but refuses to provide connectivity to individual houses because it is cost prohibitive (leaving citizens to do it themselves).

Even where high-speed connectivity is available, the costs can be prohibitive. Affordability is a key issue for low income groups. Connectivity and equipment are expensive in Ireland and lack of competition (or required bundling with TV services) keeps costs high. Ireland does not provide good value for money with respect to digital services and technology - the Republic ranks behind 20 countries in Europe for speed of Internet but is the eighth most expensive country in Europe according to a report released by UK consultancy BDRC Continental and cable.co.uk (<https://www.cable.co.uk/broadband/deals/worldwide-price-comparison/>).

Thirdly, lack of skills/knowledge is an ongoing challenge. Many people do not have the expertise and knowledge to do more than consume digital information. For others, lack of knowledge of what can be done and why, concerns about privacy and security, and similar concerns deter people from using more digital technology (CommReg 2017).

While digital transformation can dramatically transform access to services this does not happen automatically. A National Digital Strategy needs to identify where supports are needed to allow citizens to fully benefit from digitalisation and set out appropriate policies to ensure that these supports are provided.

It is important to note that services should be 'digital by default' - developed to be accessed digitally but there needs to be an assisted or alternative route to the services for those who cannot or do not want to access them digitally ('digital by desire'). In many cases the digital alternatives will become less used over time as citizens become more educated and trust builds in the digital option.

¹ The [CSO estimates that, in 2018](#), 89% of households in Ireland have access to the internet at home – main use is *Finding information on goods and services* (88%). The next most common internet activity was *E-mail* (84%), followed by *Social networking*¹ and *Reading or downloading online news*, both 73%. *Internet banking* was used by seven out of every ten (70%) users of the internet in Ireland

What supports do communities and businesses need to benefit fully from the use of digital technology?

As set out above cost and speed still remain significant barriers for communities and businesses. In particular SMEs and community organisations, need a secure, trustworthy infrastructure available across Ireland for relatively low cost, with subsidised equipment purchase, training, and servicing. One approach that other communities have taken is the development of municipal wi-fi (that is, broadband services that are publicly owned and managed for the benefit of the locality) have the potential to create jobs, enhance skills, and provide digital services at lower costs than commercial vendors. Municipal wifi is particularly useful but large telecommunications companies have fought the implementation of such services as anti-competitive as they are by their very nature subsidised by government schemes. A new initiative from the European Commission was launched in May 2018 to issue vouchers for developing public wifi spots.

Along with the Citizens Information Service network, Ireland's public library system is an important network that can be leveraged to help local communities more effectively use digital technology. Libraries are important public spaces for communities to access technology and resources. Libraries can provide free space for remote working, community meeting space, free access to wireless Internet, and training and workshops.

What are the main benefits and barriers to using online Government services?

Ireland is ahead of European norms in terms of digitisation of public services (although rural broadband access remains a problem). In the European Commission's [Digital Economy and Society Index](#) 2018, Ireland climbed two places to sixth place out of the 28 member states plus Iceland, Norway and Turkey.

In 2018, over half of internet users (52%) *Obtained information from websites or apps* of public authorities or public services, while 43% *Downloaded or printed official forms* from their websites or apps. *Submitting completed forms online* was carried out by six out of every ten (60%) of internet users. Nearly three quarters (73%) of internet users aged 30 to 44 years submitted completed forms online, compared with just 42% of internet users in the 16 to 29 years age category – mainly because younger users don't need to submit official forms. People aged 16 to 29 years were more likely to engage in online leisure or recreation activities, such as *Social networking* (92%), (CSO 2018).

One of the key aims of Ireland's eGovernment Strategy 2017-2020² is Digital First – the digitisation of key transactional services (taxation, passports, driving licences). Digital public services reduce the administrative burden on citizens by making their interactions faster, more efficient, more convenient and transparent and less expensive. The Strategy explicitly recognises that other channels or 'assisted digital' need to be available for people who are disconnected by choice or necessity. However, as services continue to move online citizens need clear pathways – both to those services and to information about using those services – and information about the alternatives.

For individual citizens, obvious benefits to online public service provision include round the clock accessibility. The ability to quickly and readily access information, forms, schedules, and contact information without having to make phone calls or wait for opening hours to

speak to staff cannot be underestimated. Businesses also use online government services as data repositories, to improve efficiencies, and for communication. However, there will always be individuals who prefer human contact, who distrust online systems, whose home computers are inadequate, or who do not have the knowledge or experience to use e-government services. Relevant forms and sites need to be “backwards compatible”; that is, citizens should not need to have the newest equipment to access information and forms. Balancing access with security can be a challenge as government agencies upgrade their systems.

Additional comments

One of the questions that the National Digital Strategy must always keep at the forefront is “Cui bono?” or “who benefits?” Recent research in machine learning, Big Data, and artificial intelligence has been critical of the ways that gender, race, socioeconomic status, and other divisions are exacerbated and perpetuated. These issues are integrated with who benefits, who is left out, and whose voice is not heard.

Ireland has much to recommend it with respect to effecting digital transformation. Ireland is ahead of European norms in terms of digitisation of public services. Multinational companies and SMEs already working in the digital arena, education available from primary education through adult skills development, successful public-private partnerships in data, and a relatively small and literate population work to its advantage. However, the updated National Digital Strategy must realistically tackle challenges and concerns. Ireland’s digital infrastructure is still inadequate and costly, especially outside of urban areas. Any technological developments must attend to equity, justice, trust, privacy, and security. Many potential users of digital services remain rightly concerned about highly publicised data breaches and concerns about the malign influence of social media. A November 2018 survey by Eurobarometers for the European Commission found that citizens of Ireland are on average more concerned about the data they share online being used for political purposes than other EU citizens (79% as opposed to 67%). There needs to be more investment in education and skills building, not just for technical workers but for citizens.

How do we make the digital transformation more inclusive for all?

In order to ensure inclusivity, three key areas need to be addressed in a national digital strategy:

- **Providing digital assistance** (known as **assisted digital**) to people that cannot access digital services directly. For example, providing support to access online services (example is Revenue’s phone helpline that people can use to register and pay for Local Property Tax). Key point is that the underlying service is fully digitised but access to the service can take a non-digital route.
- **Providing broad-based education** to ensure that those who can benefit from digitisation are fully able to benefit. This means education across ages and societal groups - build in appropriate interventions in schools, universities, groups like refugees and immigrants, older and retired people with targeted interventions. While younger generation are growing up with digital, older people can be cautious and fearful so there should be a focus on engagement with the needs of older people.

- **Building trust in digital services** - citizens need to know why a particular path has been chosen and how their personal data will be treated (GDPR), ensure that individuals and businesses have access to information about themselves. Publish public information unless there is a pressing reason not to and provide a framework for access to information - openness is key

Note that another option is to offer access to digital services via trusted intermediaries such as CISs (An Post is working on a digital assist service in post offices). CIB-funded services are good examples of services provided at a remove from central government and therefore more widely trusted. Another key area of relevance to CIB is access to information which is key to the successful delivery of public services.

Any national strategy must place ethical, social, and legal concerns and the well-being of people at its core. Lastly, government policy and regulation must form a central part of the strategy to ensure this.

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