

COMMISSION IMPLEMENTING REGULATION (EU) 2020/1121**of 29 July 2020****on the collection and sharing of user statistics and feedback on the services of the single digital gateway in accordance with Regulation (EU) 2018/1724 of the European Parliament and of the Council****(Text with EEA relevance)**

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2018/1724 of the European Parliament and of the Council of 2 October 2018 establishing a single digital gateway to provide access to information, to procedures and to assistance and problem-solving services and amending Regulation (EU) No 1024/2012 ⁽¹⁾, and in particular Article 24(4) and Article 25(5) thereof,

Whereas:

- (1) Article 24 of Regulation (EU) 2018/1724 requires the competent authorities of the Member States and the Commission to ensure that statistics are collected in relation to users' visits on the single digital gateway established pursuant to Article 2(1) of that Regulation ('the gateway') and on the webpages to which the gateway links. It also requires the competent authorities, the providers of assistance and problem-solving services as referred to in Article 7(3) of Regulation (EU) 2018/1724 and the Commission to collect and exchange, in an aggregated way, the number, the origin and the subject matter of requests for assistance and problem-solving services and their response times.
- (2) Article 25 of Regulation (EU) 2018/1724 requires the Commission to provide users of the gateway with a feedback tool enabling them to comment anonymously on the quality and availability of the services provided through the gateway, of the information made available therein and of the common user interface. It also requires the Commission to ensure that users can access that tool from all webpages that are part of the gateway. The same obligation applies to the competent authorities unless they already have in place on their webpages another user feedback tool with similar functionalities.
- (3) The method and rules for collecting and sharing user statistics and user feedback are combined in a single implementing act because the data covered will be collected and made accessible through a common dashboard and a common data repository. The data will be used in combination by the national coordinators and by the Commission to monitor whether the services provided through the gateway comply with the quality criteria and to improve the functionality of the single digital gateway.
- (4) In order to collect user statistics and feedback that is comparable and useable for the purposes set out in Regulation (EU) 2018/1724 and to facilitate matching between the data and the related service, it is necessary to specify the context data that must be made available together with the user statistics and feedback. These context data should include the URL and information on the content of the relevant webpage. Service providers should include this information as tags in the metadata of the webpages, or insert it directly in the repository for links. The Commission should use a tool to retrieve the tagging information from the webpages in an automated way. For that purpose, the tagging information should be structured and formatted in a way that is recognised by the tool.
- (5) To facilitate the collection of user statistics related to the users' views of webpages accessible through the gateway, pursuant to Article 24 of Regulation (EU) 2018/1724, such statistics should be collected through web data analytics tools in an automated way and transmitted to a common data repository automatically and regularly.
- (6) In cases where further technical clarifications are needed to ensure the interoperability between the national ICT solutions and the common IT tools, the Commission should provide such clarifications in consultation with the gateway coordination group. Specific operational arrangements required for the collection and transmission of data from assistance and problem solving services as well as the detailed survey questions, should be discussed by the gateway coordination group.

⁽¹⁾ OJ L 295, 21.11.2018, p. 1.

- (7) Regulation (EU) 2018/1724 establishes the later time-limit of 12 December 2023 for digitalisation of the procedures listed in its Annex II. Consequently, prior to 12 December 2023, user statistics and feedback related to such procedures should only be collected in relation to webpages on which the explanation of a procedure is published.
- (8) Regulation (EU) 2018/1724 establishes the later time-limit of 12 December 2022 for the provision of information, explanations and instructions by municipal authorities. Consequently, prior to 12 December 2022, the requirements laid down in this Regulation should only apply to municipal level webpages notified to the repository for links ahead of this deadline.
- (9) Taking into account the different case-handling systems in use, both the automated and manual collection of the categories of statistics referred to in Article 24(2) of Regulation (EU) 2018/1724 should be allowed for.
- (10) The single digital gateway aims to make it easier for citizens and businesses to exercise their single market rights by providing user friendly access to information on rights and rules applicable to cross-border activities. In order to understand the specific needs and interests of cross-border users, statistics related to the use of services provided through the gateway by these users, such as statistics about the countries from which users are accessing the webpages of the gateway and the number of cross-border users turning to the gateway assistance and problem-solving services for help, should be collected.
- (11) The providers of assistance and problem-solving services as defined in this Regulation should collect the number of requests that relate to the rights, obligations, rules and procedures laid down in Union and national law applicable to users exercising or intending to exercise their rights derived from Union law in the field of internal market, in the areas of information listed in Annex I to Regulation (EU) 2018/1724. Where an assistance and a problem-solving service receives requests falling outside the scope of Regulation (EU) 2018/1724, it should distinguish between such requests and requests concerning areas covered by that Regulation, as far as possible.
- (12) Where assistance and problem-solving services are already collecting statistics on the basis of existing Union law or arrangements with the Commission, the providers of assistance and problem-solving services or the network managers should ensure that statistics to be covered in accordance with Regulation (EU) 2018/1724 are also collected and transferred to the common data repository.
- (13) The service providers should enable users to leave their feedback on all webpages that are part of the gateway irrespectively of whether users have accessed these pages from the common user interface referred to in Article 2(1) of Regulation (EU) 2018/1724, or through any web portal or a search engine.
- (14) In order to ensure comparability of feedback, common rules are needed for the transmission of the user feedback on the services provided through the gateway to the common data repository. In addition, service providers should either map and correlate the feedback questions and ratings used in their own user feedback tools with those in the common user feedback tool or adapt their questions and ratings where needed. The service providers should not be obliged to include a link to the survey with detailed questions if their alternative user feedback tools already include similar questions. In such cases they should also map and adapt these questions to those of the detailed survey that is part of the common user feedback tool.
- (15) Users should be able to provide feedback on the user friendliness of information about procedures and about the ease of use of online procedures, referred to in Article 2(2)(b) of Regulation (EU) 2018/1724 and the common user interface referred to in Article 2(1) of that Regulation. Service providers should be able to decide the best time and place to invite users of procedures to give feedback. They may choose to include a link to a feedback tool on a webpage where the procedure can be launched, in the confirmation of receipt of the application, in the output of a procedure, if it is displayed to users immediately after the submission of the request, or on the webpage with online information about the procedure. In case there would be two invitations to provide feedback on one webpage: one on the quality and availability of the procedure and another on the information about this procedure made available therein, the purpose of providing feedback on both issues should be clearly explained to avoid confusion on the part of the user.

- (16) In case of assistance and problem-solving services listed in Annex III and referred to in Article 7 of Regulation (EU) 2018/1724, the invitation to provide feedback should be sent to users who can be contacted by digital means immediately after the service is provided. Where the nature of the service requires some time for the solution or advice to be put into practice, the services should be allowed to send the invitation for submitting feedback shortly after the final response to the request has been provided as this allows the user to verify whether the solution or advice works in practice.
- (17) The collection and exchange of user statistics and feedback under this Regulation should not involve the processing of personal data ⁽²⁾ of citizens and business using the services offered as part of the gateway. The common user feedback tool should warn users not to provide any personal data in the free text box.
- (18) Commission Decision (EU, Euratom) 2017/46 ⁽³⁾ applies to the common user feedback tool, the interconnection service allowing the transmission of the user feedback when the alternative user feedback tool is used and the common data repository.
- (19) Article 24(1), (2) and (3) and Article 25(1) to (4) of Regulation (EU) 2018/1724 apply from 12 December 2020, therefore the requirements laid down in this Regulation should also apply from this date.
- (20) The measures provided for in this Regulation are in accordance with the opinion of the Single Digital Gateway Committee,

HAS ADOPTED THIS REGULATION:

CHAPTER I

General provisions

Article 1

Definitions

For the purposes of this Regulation, the following definitions shall apply:

- (1) 'common user feedback tool' means the feedback tool provided by the Commission pursuant to Article 25(1) of Regulation (EU) 2018/1724;
- (2) 'alternative user feedback tool' means any other feedback tool which has similar functionalities as the common user feedback tool and is available on the webpages of a competent authority for the purpose of monitoring service quality, as referred to in Article 25(4) of Regulation (EU) 2018/1724 or is available to users of the assistance and problem-solving services listed in Annex III and referred to in Article 7 of Regulation (EU) 2018/1724;
- (3) 'common dashboard' means the interface providing service providers with access to the management functionalities of the gateway, including access to the repository for links as set out in Article 19 of Regulation (EU) 2018/1724;
- (4) 'common data repository' means the data management tool linked to the common dashboard allowing for the collection, storage, sharing, analysis and displaying of user statistics and feedback collected in accordance with Articles 24 and 25 of Regulation (EU) 2018/1724;

⁽²⁾ Personal data within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ L 119, 4.5.2016, p. 1).

⁽³⁾ Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission (OJ L 6, 11.1.2017, p. 40).

- (5) 'service providers' means all of the following:
- (a) competent authorities within the meaning of point 4 of Article 3 of Regulation (EU) 2018/1724;
 - (b) the Commission and bodies, offices and agencies of the Union providing information, procedures and assistance or problem-solving services covered by Regulation (EU) 2018/1724;
 - (c) providers of assistance and problem-solving services as referred to in Article 7(3) of Regulation (EU) 2018/1724;
- (6) 'network manager' means the Commission and bodies, offices and agencies of the Union or an entity responsible for the coordination of the work of assistance and problem-solving services performing similar tasks in all or in the majority of Member States.

Article 2

Context data

1. Together with the user statistics and user feedback data related to information webpages linked to the gateway, the service providers shall transmit the URL of the webpage to which the user statistics or user feedback relate.
2. The service providers shall ensure that context data including descriptive elements to enable the identification of the substance covered by the webpage to which the URL relates are provided as follows:
 - (a) as part of the meta-data of all pages which are part of the gateway structured and formatted in a way that it can be recognised by the tool referred to in paragraph 4; or
 - (b) directly to the repository for links together with the relevant URL.
3. The descriptive elements referred to in paragraph 2 shall consist of the following indicators, to be associated with the different types of pages as set out in Annex I:
 - (a) the Member State;
 - (b) a regional or local indicator, where the information provided only applies regionally or locally;
 - (c) the language in which the information is provided on the page;
 - (d) a marker that the page is part of the gateway;
 - (e) the type of service or services covered on the page: information, procedure or assistance and problem-solving service;
 - (f) an indication of the topic covered as set out in Annex I of Regulation (EU) 2018/1724 or the assistance and problem-solving service covered as set out in Annex III of that Regulation or included in the gateway in accordance with Article 7 of that Regulation.
4. The Commission shall provide a tool to retrieve the tagging information directly from the webpages that are part of the gateway for storage in the common data repository together with the relevant URLs.

CHAPTER II

Statistics

Article 3

Collection and transmission of statistics relating to information services

1. All service providers shall collect and transmit for all the webpages providing information on rules and obligations, on procedures and on assistance and problem solving services that are part of the gateway and for which they are responsible, the number of page views within the reporting period broken down into:
 - (a) the countries from which users are visiting the webpage;
 - (b) the type of devices used to visit the webpage.
2. The service providers shall ensure that the web data analytics tool used to collect the statistics referred to in paragraph 1, fulfils the technical interoperability requirements listed in Annex II to enable the automatic transmission of statistics to the common data repository.

3. The service providers shall transmit the statistics referred to in paragraph 1, together with the URLs of the webpages to which the statistics relate, to the common data repository once per month through an application programming interface developed by the Commission.

4. An automatic confirmation of a successful transmission or an alert if the transmission was not successful shall be provided to a service provider having attempted to transmit statistics to the common data repository pursuant to paragraph 3.

Article 4

Collection, aggregation and transmission of statistics relating to assistance and problem-solving services

1. For the purposes of this Chapter, a request for an assistance and problem-solving service means any request submitted through an online form, email or any other communication means. Where the providers of an assistance and problem-solving service or network managers decide that it is not feasible to include statistics on requests received through phone calls, online chats, or visits in person, they shall inform the Commission thereof.

2. Providers of assistance and problem-solving services or network managers shall communicate the number of requests to the common data repository broken down into requests:

(a) from citizens or from businesses;

(b) from users in a cross-border situation or from those in a national situation.

The division of requests into categories referred to in point (a) and (b) shall not apply where the service is only offered to one of the two categories of users referred to in points (a) and (b).

3. For the purpose of paragraph 2(b) a user in a cross-border situation means a user in a situation which is not confined in all respects within a single Member State.

4. For the purpose of collecting statistics on the subject matter of specific requests made, the provider of assistance and problem-solving service or a network manager shall provide the Commission with a list of categories for the subject matters, prior to the inclusion of such service in the gateway.

5. The response time shall be calculated from the receipt of the request to the final response or closure of the case, on the same basis as the applicable deadlines to be respected or the average or estimated time required to deliver the service, referred to in Article 11(1)(d) of Regulation (EU) 2018/1724.

6. The response times shall be calculated as an average in calendar days of the response times over a period of 6 months.

7. The statistics shall be collected and aggregated at the level of each individual provider of the assistance and problem-solving service and shall indicate the Member State of the provider of the service. The Commission shall agree on the modalities of transmission of statistics to the common data repository with the provider of the assistance and problem-solving service or with a network manager prior to the inclusion of service in the gateway.

8. The providers of assistance and problem-solving services or the network managers shall transmit the aggregated statistics twice a year. For the period from 1 January to 30 June the aggregated statistics shall be transmitted by 31 August, and for the period from 1 July to 31 December by 28 February of the following year, unless otherwise agreed with the Commission.

Article 5

Access to and storage of statistics

1. The statistics aggregated and transmitted in accordance with this Chapter shall be kept in the common data repository for a maximum of 3 years from the transmission date. It shall be automatically deleted after this period has lapsed.

The deletion shall not apply to the data made available to the public in accordance with Article 24(3), last sentence of Regulation (EU) 2018/1724.

2. The Commission shall ensure that the common dashboard enables the national coordinators, the service providers and the Commission to:

- (a) search, sort and filter the data;
- (b) visualise the data in graphs and charts;
- (c) extract the data in a form of reports and download them.

CHAPTER III

User feedback

Article 6

Functionalities of the common user feedback tool

1. The common user feedback tool referred to in Article 25(1) of Regulation (EU) 2018/1724 shall contain the following elements:

- (a) questions to solicit user feedback, user ratings and a free text box, relevant for the webpages with information, procedures and assistance and problem solving services, as included in Annex III;
- (b) surveys with detailed questions on the quality of information, of online procedures and of the assistance and problem-solving services, to be invited to participate once that user has submitted the initial feedback;
- (c) automatic transmission of the user feedback to the common data repository;
- (d) capture and transmission of the URL of the webpage to which the user feedback relates together with the user feedback.

2. For the collection of user feedback on information and on procedures, service providers shall be able to choose between a version of the common feedback tool with or without a free text box.

3. The Commission shall ensure that the common dashboard sends regular email messages to all service providers using the common user feedback tool to remind them that they can consult the feedback regarding their services in the common dashboard.

4. The Commission shall make the common user feedback tool available in all official languages of the Union.

Article 7

Functionalities of the alternative user feedback tools

1. Alternative user feedback tools used by service providers shall include:

- (a) similar questions and a rating system producing comparable results to the one used in the common user feedback tool and, for the assistance and problem-solving services a free text box allowing users to leave free text comments;
- (b) links to the surveys included in the common user feedback tool according to the type of the service;
- (c) a mechanism provided by the Commission allowing the transmission of the feedback data together with the URLs of the webpages to which the feedback relates, to the common data repository.

For the collection of user feedback on information and on procedures, service providers shall be able to choose whether to include a free text box or not.

2. Once a user submits responses to the questions referred to in paragraph 1(a), the user shall receive a confirmation message with an invitation to provide more detailed comments by clicking on a link referred to in paragraph 1(b). The link shall direct users to a page on the common user feedback tool containing a survey on compliance with the quality requirements laid down in Regulation (EU) 2018/1724.
3. Point (b) of paragraph 1 and paragraph 2 shall not apply where a service provider already collects feedback on questions which are similar to those included in the survey.

Article 8

Collection of user feedback on online procedures

The service providers shall integrate the common or an alternative user feedback tool in a way that makes it easy for users to provide their feedback either following submission of the request or in case they choose not to submit a request in the end.

Article 9

Collection of user feedback from users of assistance and problem-solving services

The providers of assistance and problem-solving services shall ensure that users of their services who can be reached by digital means receive an invitation to provide their feedback on the service received that is sent either in conjunction with the final response provided by the assistance and problem-solving service provider or within a short time thereafter, which shall not exceed ten working days.

Article 10

Transmission of user feedback

1. All feedback provided by users through the common user feedback tool together with the URL links referred to in Article 2 shall be transferred automatically, as soon as it is provided by users, to the common data repository.
2. The service providers collecting feedback through an alternative user feedback tool shall use the mechanism referred to in Article 7(1)(c) and shall comply with the technical interoperability requirements set out in Annex II to enable the transfer of user feedback as soon as it is provided by users, simultaneously to the national user feedback recipients and to the common data repository.

Alternatively, they shall transfer asynchronously, in bulk, all feedback provided during a calendar month, within five working days following the end of that calendar month.

3. Service providers using an alternative user feedback tool shall ensure that:
 - (a) only the feedback to questions and ratings corresponding to those in the common user feedback tool are transferred to the common data repository;
 - (b) feedback provided as free text is not transmitted to the common data repository;
 - (c) the URLs of the webpages from which feedback is collected are transmitted together with the feedback to the common data repository.
4. Where service providers qualify for the exception laid down in Article 7(3), they shall ensure that the feedback on questions that are similar to those included in a survey is transmitted to the common data repository.

Article 11

Access to and storage of user feedback

1. The data on user feedback shall be stored in the common data repository linked to the common dashboard.

2. The Commission shall provide the following access rights to the user feedback stored in the common data repository:
 - (a) national coordinators and the Commission shall have access to user feedback with the exception of free text comments;
 - (b) service providers shall have access to user feedback concerning services for which they are responsible, including free text comments provided by users using the common feedback tool.
3. The Commission shall ensure that the user feedback is stored in the common data repository for a maximum of 3 years and is automatically deleted after this period.
4. The Commission shall ensure that the common dashboard enables its users to:
 - (a) search, sort and filter the feedback;
 - (b) visualise it in charts and graphs;
 - (c) extract the data in the form of reports and download them.

Article 12

Responsibilities

1. The service providers using alternative user feedback tools shall be responsible for:
 - (a) the functioning of their own tools through which they collect user feedback under Regulation (EU) 2018/1724;
 - (b) the transfer of the feedback to the common data repository through the interconnection service provided by the Commission, in bulk or in any other form of transfer;
 - (c) complying with the technical requirements laid down in this Regulation;
 - (d) the security of the national tools collecting and participating in the transmission of the user feedback.
2. The service providers using the common user feedback tool shall be responsible for the insertion of links to that tool in accordance with this Regulation.
3. The Commission shall be responsible for:
 - (a) the functioning, security and the accessibility of the common user feedback tool;
 - (b) the links to the common feedback tool to be included in the Union-level webpages;
 - (c) the functioning of the interconnection service referred to in point (b) of paragraph 1;
 - (d) maintaining and ensuring the availability of the infrastructure necessary for receiving data transfers.

CHAPTER IV

Final provisions

Article 13

Personal data

1. The service providers or network managers in case of assistance and problem-solving services shall ensure that the statistics aggregated and transmitted by them to the common data repository do not contain any personal data.
2. The common user feedback tool shall allow users to comment anonymously about their experience with the services provided through the gateway. The free text box shall include a warning to users not to include personal data.

*Article 14***Entry into force**

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

It shall apply from 12 December 2020.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels, 29 July 2020.

For the Commission
The President
Ursula VON DER LEYEN

Indicators for tagging referred to in Article 2(3)

	Elements that must form part of the tagging information to be included in the metadata of the webpages that are part of the single digital gateway							
	Generic part	Country code	Sub-national code (where applicable)	Type of service (*)	Language of the page	Area covered by Annex I to Regulation (EU) 2018/1724		Service covered by Annex III or Article 7 of Regulation (EU) 2018/1724
	Single Digital Gateway (SDG)	Following ISO 3166 –Alpha 2 code (EL for Greece)	Following NUTS 1-3 or LAU		Following ISO 639-1 Alpha 2 Code	A-Q	01-09	Full title of service
Webpages with information on rules, rights and obligations	X	x	x	Information	x	x	x	Not applicable
Webpages with information on proce- dures	X	x	x	Procedure	x	x	x	Not applicable
Webpages with information on assistance or problem solving services	x	x	x	Assistance	x	Not applicable	Not applicable	x

(*) If a page contains information on more than one type of service or covers more than one information area, all relevant elements must be included in or associated with that page.

ANNEX II

Technical requirements referred to in Article 3(2) and Article 10(2)**Data transmission**

An Application Programming Interface (API) gateway will expose a Representational State Transfer (REST) API. Each service provider collection system can call this API:

- (1) in real time – no limitation to the number of calls;
- (2) regularly, according to a schedule chosen by the service provider.

API security

Communication with the API Gateway will be secured via an API Key. Each service provider will have a specific API Key. This key will allow to secure the communication (encryption of the channel) and to know which service provider is sending data (authentication).

API Keys will be available on a dedicated back-office web application. Each service provider will generate his key on the web application, download it and install on its premises.

Requirements enabling the data transmission

For the purpose of ensuring automatic transmission, the web analytics tool referred to in Article 3(2) and the alternative user feedback tool referred to in Article 10(2) shall:

- (a) allow transmission of data in JSON format via REST APIs;
- (b) support secure connections with Hyper-Text Transfer Protocol (HTTP) over Secure Sockets Layer (SSL);
- (c) support ISO 8601 for the representation of date and time. Date and time data shall be expressed in Coordinated Universal Time (UTC);
- (d) support a unique identifier for transmissions. A service provider pushes the data with a unique identifier provided through the API. If a service provider decides to change this data, it must push a correction with the same unique identifier.

The frequency of transmission of statistics should not change the structure of the JSON file. For example, the JSON could contain array of objects (one per set of statistics for the reference period), an array of length n;

The Commission shall provide a detailed technical description of the API for user feedback and statistics.

ANNEX III

User feedback questions in the common user feedback tool, referred to in Article 6(1)(a):

- (1) Questions related to information on webpages
 - Found what you were looking for? (mutually exclusive options: YES/NO/PARTLY) [*mandatory field*] (*)
 - Rate this page (star rating: from 1 to 5) [*mandatory field*]
 - Help us improve (free text box) [*optional field*]
- (2) Questions related to procedures
 - Rate how easy it was to use this procedure (star rating from 1 to 5) [*mandatory field*]
 - Help us improve (free text box) [*optional field*]
- (3) Questions related to assistance and problem-solving services
 - Rate the service provided (star rating from 1 to 5) [*mandatory field*]
 - Help us improve (free text box) [*optional field*]

The user feedback tool for information and procedures will be prepared in two versions: one with the free text box and another without the free text box enabling the service providers to choose which one to use in accordance with Article 6(2).

(*) The text in brackets [...] informs about the fields that will be used in the common user feedback tool.
