

From Brussels to Brabant: Delivering Public Value by Implementing e-Government in a Multilevel Setting

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ABSTRACT

In 2006, the European Parliament agreed to the ‘Services Directive’, which aims to develop the internal services market in the European Union. This directive requires member states to simplify services and adapt online portals, which facilitate European interoperability for eGovernment services. This article trails the translation of this requirement from Brussels to The Hague, where the services portal was built under the name ‘Berichtenbox voor Bedrijven’ or Message Box-system, and to the Brabant province where municipalities implemented the portal to improve communications between businesses and state. It presents the findings of a mystery shopping research in which we contacted all 67 Brabant municipalities through the MB-system with a request for information on permits. We describe how the original requirements from the European ‘Service Directive’ have gone lost “in translation” and that national government, municipalities as well as businesses do not utilize the services as was intended. We conclude by discussing necessary preconditions for creating public value by developing and implementing eGovernment services in a multi-level polity.

Categories and Subject Descriptors

C4. [Performance of Systems]: Reliability, availability, and serviceability); H.3.5 [Online Information Services]

General Terms

Management

Keywords

eGovernment; Multilevel Governance; EU-policy Implementation

1. INTRODUCTION

This article studies how public value is created by implementing e-Government services in a multilevel government setting. It does so by examining the implementation of the ‘Services Directive’, which was adopted in the European Parliament in 2006 to expand the internal services market in the European Union. One of the required instruments to further develop the internal services markets and facilitate communication between service providers and public authorities is the electronic transnational Point of Single Contact (PSC). Because the European Union does not have

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the authority and capacity to develop ICT-platforms such as this, the Services Directive required all member states to develop their own platform. In this article we look at the Dutch PSC, the ‘Berichtenbox voor Bedrijven’ or ‘Message Box-system’ (MB-system from hereon), which was recognized as a successful e-Government application by the European Commission and was later adopted by Croatia and Lithuania.

The article therefore trails the translation of this requirement from Brussels to The Hague, where the MB-system was built and to the Dutch province of Brabant. This province is recognized as an advocate and frontrunner of e-Government services in the Netherlands. Within the legal and territorial authority of this province, 67 municipalities operate which have all been obliged to implement the MB-system to improve communications between businesses and the state.

Our theoretical framework draws on the literature of Multi Level Governance (MLG from hereon) and eGovernment implementation [cf. Bache 2007; Marks et al. 1996; Scharpf 2007]. We present a model for implementation of eGovernment systems in a multilevel context, whereby we focus on the position of the end-user as target group within the context of supra, national and subnational government levels. The article sets out to uncover the challenges of implementing eGovernment in this multilevel-polity, by studying the effects of the application of a European Directive for authorities at the subnational level and for end-users. Our argument in this article is the following: delivering public value in terms of public services counts on successful implementation of eGovernment. In the context of the European Union this means involvement of different levels of governance, especially the subnational level, since they need to implement new systems for eGovernment. On the other hand, attention needs to be paid to the actual end-users, since they determine the contribution to public value that is delivered through new eGovernment systems.

We base this argument on the findings of a mystery shopping research in which we contacted all 67 of Brabant’s municipalities. We executed this research by setting up our own fictional company, by registering a MB-account and sending all municipalities a request for information on permits with this account. In doing so, we collected data on our own participant observations with the system, on the response behaviour of municipalities, and made a selection of 20 municipalities (30% of the total figure) with whom we conducted telephonic and face-to-face interviews.

We conclude the article by describing how the original requirements from the European Service Directive have gone lost “in translation” and that national government, municipalities as well as businesses do not utilize the services as was intended. We

also discuss necessary preconditions for successful development and implementation of eGovernment services in a multi-level polity.

2. THEORETICAL FRAMEWORK

For our theoretical framework we start out with the concept of public value. This concept was coined by prof. Mark Moore as a framework to discuss public sector activities against their desired social impact [Moore and Khagram 2004]. According to Moore public services contribute to the delivery of public value, which ‘equates managerial success in the public sector with initiating and reshaping public sector enterprises in ways that increase their value to the public in both the short and the long run’ [Moore 1995]. The European Commission adds that ‘public services are services offered to the general public and/or in the public interest with the main purpose of developing public value. Public value is the total societal value that cannot be monopolized by individuals, but is shared by all actors in society and is the outcome of all resource allocation decisions’.¹ Several definitions [Layne and Lee 2001; UN 2012] stress the impact of the use of modern systems of information technology (IT) in public service delivery, and define three traditional categories of government interactions; government to citizens (G2C), government to business (G2B), and government to government organizations (G2G).

In this article we want to contribute to the discussion about the governance of eGovernment by looking at G2B-relations. We will pay attention to what we call the “vertical” governance dimension of eGovernment and which refers to the different levels of government that are involved in the development, implementation and use of eGovernment systems. “Vertical” is in this definition opposed to “horizontal”, in the meaning that horizontal refers to the participation of stakeholders on a similar level or next to the government itself. This horizontal perspective receives attention under names such as ‘open government’, ‘we-government’ etc. From a vertical governance point of view, eGovernment is usually discussed in the context of different government agencies or different levels of government in the same state [Bekkers and Homburg 2007; Dawes et al. 2004; Gascó and Roy 2006; Gil-Garcia et al. 2007; Mayer-Schönberger and Lazer 2007; Rodousakis and Mendes dos Santos 2008]. Less is known about the aspects of implementing digital government services in a vertical multilevel governance setting, such as the European Union.

What has been receiving a lot of attention in the last decades in the context of the European Union (but not necessarily the implementation of eGovernment services) is Multi Level Governance or MLG [Bache 2007; Marks et al. 1996; Scharpf 2007]. This addresses the shifts in vertical relations and boundaries between different government levels, next to the shifts in horizontal relation between state and society [Milio 2010] and is thereby especially appropriate for our study. The popularity of MLG stems from the alternative view it offers on EU policy process, next to the state centric intergovernmentalist approach (Marks et al, 1996), considering national state government as the key actors in the EU system.

When it comes to the interplay of different government levels within the European Union, scholars usually turn their attention to three main levels or layers of public authority: the supra, the national and the subnational level [cf. Piattoni 2009]. MLG refers

to the negotiated, non-hierarchical exchanges between the institutions at these different levels which “are not to be seen as neatly vertically ordered, institutional relationships. Instead one has to imagine a rather more complex and fragmented picture, where negotiations and influencing can take place directly between, say, the supranational and regional subnational levels, thus bypassing the state level” [Peters and Pierre 2001].

Milio (2010) states that MLG can not only be perceived as a model for policy implementation for the European Union in a descriptive way, but also in a prescriptive way. Successful policy implementation requires the input of all the government levels involved. This has been recognized by the European Commission who have stated that “the way in which the Union currently works does not allow for adequate interaction in a multi-level partnership; a partnership in which national governments involve their regions and cities fully in European policy-making. Regions and cities often feel that, in spite of their increased responsibility for implementing EU policies, their role as an elected and representative channel interacting with the public on EU policy is not exploited” (European Commission, 2001 p.12).

When it comes to eGovernment in the European Union national member states are responsible for the development and implementation of eGovernment systems for their own national citizens and companies. At the same time, exchanges between administrations of various States and cross-border service delivery is intensifying, because of the dynamics of the internal market and necessary institutional cooperation between authorities in the different Member States. This calls for interoperability policies at the EU-level, ensuring ‘that software, hardware and procedures in use by two or more entities are compatible, and hence that it is possible to undertake common or related activities’ [Götze et al. 2009, p.376]. Various authors have named interoperability of eGovernment-services an important instrument of Europeanization in the policy-making process [Criado 2009; Criado 2012]. Criado claims that interoperability is ‘one of the most—if not the most—influential carriers of policy convergence across European administrative systems and public sectors’ [2009, p.37]. If this is the case, success in implementing interoperability of digital public services leads not only to the improvement of service delivery throughout the EU, but also to the realization of the European multilevel governance system itself.

As pointed out by several scholars [Alabau 2004; Criado 2009; Criado 2012], the Union has only limited powers when it comes to eGovernment, since the Member States have not granted the Union regulating authority on this aspect. As a consequence, the policies on eGovernment by the European Union are often seen as “soft regulation”. On the other hand, requirements on eGovernment are, as the Service Directive demonstrates, also part of directives and regulations based on “hard regulations”. Those hard regulations need to be formally transposed by national governments, whereas the actual implementation and application takes place by authorities directly interacting with businesses and citizens, which is in most cases on the subnational level. In terms of public value delivery, it is thus imperative to take the interplay between supranational, national and subnational levels into account. We argue that it is also imperative to incorporate the end-user, a European citizen or a company, into the model and to stress the importance of its direct relations with all three levels for making e-Government policy implementation a success. Figure 1 illustrates our framework for discussing eGovernment in a multi-level setting. Where several government levels are involved (supra, national, subnational), each with its own responsibility and

¹ European Commission, *A vision for public services* (draft version), 2013.

functionality, the end-user is at the center of every developed and implemented policy, being the final “judge” to the delivery of public value.

When it comes to end-users, an important cause for the failure or success of eGovernment-services is the user experience. This is emphasized by Bateson [1992] who suggested that the user's experience during the delivery of a service is as important to user satisfaction as is the benefit that the service provides. Therefore, this study into the public value of eGovernment service implementation has eye for both the actual service as well as the experiences of end-users.

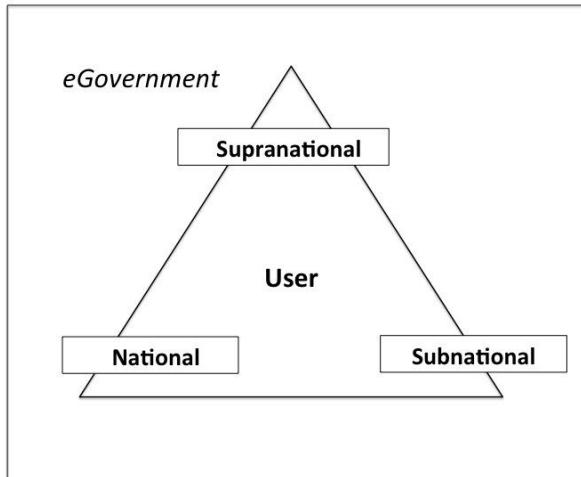


Figure 1: User-centered Multi Level Governance

3. CASE: THE MESSAGE BOX

In 2006 the European Parliament agreed to the ‘Services Directive’, which seeks to develop the internal services market in the European Union. It aims to ease cross-border operations of entrepreneurs such as fitters, window cleaners, plumbers and caterers within the European internal market and for governments to work together to assist these entrepreneurs in doing so [Barnard 2008, p.323]. Prominent studies from the time showed that a European internal services market would lead to substantial economic gains [cf. Copenhagen Economics 2005, pp.13–14]. Whereas parties throughout Europe agreed that a Services Directive could have benefits, the fundamental question was how to make such a framework operate in a context of (currently) 28 dissimilar national sets of rules and regulations. That is, in terms of services, there are vastly different requirements to professions and qualities of services throughout Europe. The idea of integrating these led to fundamental discussions about the future course of Europeanization. The Services Directive got drafted and redrafted various times as the original idea became part of a larger political discussion: ‘was the EU about deregulation and letting the market decide (the so-called Anglo-Saxon model) or was it about interventionism by central government intended to protect consumers and workers (the stereotype of the Continental approach)?’, Barnard posed [2008, p.323]. The so-called “Polish plumber” became the embodiment of this discussion: wanted by some, feared by others. Most of the attention and energy was spent on this debate, leaving more operational details of the Directive in the shade. With the implementation of the Services directive in the Member States, it turned out that the devil was hidden in these details. The Directive required Member States not only to screen own policies and eliminate hindering regulations,

but, more practically, it also required Member States to set up virtual Points of Single Contact (PSC).

These PSC's are the focus of this study and can be understood as portals that are to offer key information and facilities for cross-border communication to ‘ensure that all procedures and formalities relating to access to a service activity and to the exercise thereof may be easily completed, at a distance and by electronic means’ (Article 8, Services Directive). The European Commission states that these PSC's are ‘certainly the most visible benefit of the Services Directive for businesses. They are meant to become fully fledged e-government portals allowing future entrepreneurs and existing businesses to easily obtain all relevant information relating to their activities (applicable regulations, procedures to be completed, deadlines, etc.) and to complete electronically the relevant administrative procedures’.² PSC's were to be implemented in every Member State, being accessible for entrepreneurs and service providers all over Europe. The Polish plumber would be able to register with the Amsterdam Chamber of Commerce from his or her own personal computer in Krakow.

The PSC's were thus required to be available electronically, at a distance, and, to avoid the service provider from contacting a host of authorities, to form single institutional interlocutors from the perspective of the service provider [van der Wijst and Groothuis 2011, p.317]. Besides technical and financial challenges, this set of requirements led to major challenges for governance and authority as it necessitates ‘profound interoperation between local, regional and federal authorities, as well as with external support institutions’ [Breitenstrom et al. 2011, p.2].

The Services Directive was finally implemented on December 28, 2006 and has, with its implementation deadline for December 28, 2009, had a large impact on eGovernment practices in the EU [van der Wijst and Groothuis 2011, p.316]. Within a short time-frame of two years, all Member States were required to set up electronic portals through which national as well as Member State businesses could be facilitated in requesting and receiving services. It also required pan-European standardization of cross-border electronic procedures, e.g. authentication of documents, signatures, identities etc, as this infrastructure was not in place when Member States started with the implementation of the Services Directive. This caused the European Commission to start “large scale pilots” to work on cross border interoperability together with consortia of governments, private companies, universities and other institutes of the member states. These large-scale pilots needed to deliver the technical, legal and organizational building blocks for a Digital Services Infrastructure, with the motto “Connecting Europe”.³ To make this pan-European infrastructure function, Member States also needed to have their own national infrastructure in place. At the time of the implementation of the Service Directive, most Member States were still working on this.

Although the Service Directive was intended to solve cross border interoperability problems (for firms and businesses), it created its own interoperability problems for governments. Both at the European and the national level, pieces were missing for the

²See:http://ec.europa.eu/internal_market/services/services-dir/implementation/points_of_single_contact/index_en.htm

³[http://www.egov2012.gov.cy/mof/DITS/conference/Europeone.nsf/All/E7916860932FBB22C2257ACB004BAEBC/\\$file/p3CEF%20-%20EuropeONEMR%20v2%20.pdf](http://www.egov2012.gov.cy/mof/DITS/conference/Europeone.nsf/All/E7916860932FBB22C2257ACB004BAEBC/$file/p3CEF%20-%20EuropeONEMR%20v2%20.pdf)

digital connection of the administrations of the governments of the member states. One well-known example of interoperability-problems in the EU-context has been the use of languages. The Services Directive stimulates PSC's to be developed in multiple languages, but does not prescribe it. Many platforms, such as the Dutch MB-system, are therefore available in the host language and in English. This leads to the exclusion of a substantial amount of EU service providers, who are not catered for in a language they communicate in.

As Van der Wijst and Groothuis point out, the Services Directive was implemented in the Netherlands through the National Services Act on December 28, 2009 [Van der Wijst and Groothuis 2011, p.316]. This act made the Dutch Minister of Economic Affairs responsible for the establishment, maintenance, and security of the Point of Single Contact (PSC). This Ministry was already in charge of the webportal 'Antwoord voor Bedrijven' (literally: Answers to Businesses), the national address for information on new regulations, subsidies etc. and services for Dutch firms and businesses.

The MB-system was integrated in the general web portal for Dutch businesses and is provided through a Secured Socket Layer (SSL) which must be accessed via a central website by both service providers as authority. After registering, service providers obtain their own private MB-account through which they can communicate and perform legal procedures with all Dutch government agencies that fall under the scope of the EU Services Directive (*ibid.* 317). Government authorities delivering services to businesses, mainly decentralized governments such as municipalities and provinces, needed thereby to integrate this national digital portal into their own eGovernment systems.

Because of the time stress, the design of the MB-system was basic. End-users in terms of firms and businesses were not involved in the design and testing of the system and the final result was not much appealing. At the subnational level, the implementation of the MB-systems was mainly an administrative affaire, in activating a code to install the MB-system. The organizational implementation of the MB-system was left as a responsibility of the more than 400 municipalities themselves. Some did invest in the introduction of the system to the organization, but this was not a general rule.

The promotion of the PSC to national firms and businesses was only limited to a few specific target groups (hospitality and childcare). Also, national radio commercials were used to attract public attention for the general web portal for Dutch businesses, not so much for the PSC and its functionality.

4. MYSTERY SHOPPING AS A METHOD

In examining the user-experience of the Dutch PSC, this research applies data triangulation [Guion et al. 2011] based on a three pronged-approach. That is, we gather data on user-experience by means of participative observation, a quantitative survey and qualitative interviewing. We present our experiences with the MB-system and a mystery shopping analysis, which we consequently use to further select respondents for both closed and open in-depth interviews. As mystery shopping is not custom in this type of research we will elaborate on this method and argue that it is a particular good tool for research on e-platforms.

Mystery shopping has been categorized as a form of participant observation that 'uses researchers to act as customers or potential customers to monitor the quality of processes and procedures used in the delivery of a service' [Wilson 1998, p.414]. It has

significantly gained popularity in the last decades amongst research advisors, consultants, business studies and in organizational sciences [Wilson 1998; Tang 2014; Erstad 1998], although it is not often used to assess public digital services. We argue that it is a good tool for doing exactly this, as these platforms consist of anonymous digital environments in which a large number of users and providers are tied in. As an anonymous user or mystery shopper, one can easily and securely access, test, and retest a large number of functionalities as well as interact with a large number of respondents.

The participative dimension proved to be particularly valuable for studying an eGovernment communication system because, besides being a study object, the MB-system itself became an instrument for us to collect research data. To do this we set up a fictional firm, registered for an MB-account, studied the functionalities and configuration of the system, and used it intensively to send our requests and receive responses. For this particular research we created a fictional company called Filmhuis NL (literally: Film House NL) and registered for a MB-account. With the account we sent an information request to all 67 municipalities of the Brabant province in the Netherlands to test if municipalities use the MB-service, how they use it, and how timely they use it. In the request we told the recipients that we were interested in shooting a short film in their municipality and asked if we were allowed to on specific dates, if permits were necessary for this, which ones, and if it was possible to obtain these through the MB-service. Three weeks after the initial request all municipalities were informed through a physical letter about our research and the context of it.

A selection of 20 municipalities was then made based on the results of the mystery shopping studies. In selecting these municipalities we took municipality size (large = >100.000, middle, and small municipalities), regional spread and answering behavior (answer or no answer) into account. Nine small municipalities, six middle municipalities and five large municipalities were contacted by telephone for further research.

Fifteen of these municipalities were contacted by telephone. These interviews were taken on the basis of a closed set of questions about the user-experiences and took approximately 30 minutes. Five municipalities agreed to do face-to-face in-depth interviews of approximately an hour. Our respondents had various functions within the municipality, but were generally those who either worked with the MB-system or had responsibility for it. In the face-to-face interviews we asked to speak both those who dealt with our request and those who were involved with information policy within the municipality. The interviews provided us answers to 'tell me' questions, but also gave insight in 'show me' inquiries, as officials were asked to demonstrate their access, use, and insights into the MB-system.

5. ANALYSIS

In doing the mystery shopping analysis, we came to numerous findings as users of the MB-system. We will present these findings firstly after which we will present research data that analyses the responses we received through the system and in ensuing interviews.

While using the MB-system as users, three points stood out. Firstly, the MB-system is an online portal which features like a web-based mail portal that has a somewhat limited basic design. One can send messages to one recipient at a time, one cannot forward messages outside the MB-domain, and it lacks features that are common in commercial mail-systems (such as editing,

highlighting or sharing functions) or management features for organizations. Each user has one account, including municipalities and large companies. For small organizations such as our own fictional company this is no issue, although it forces bigger organizations and municipalities, which may have multiple issues and stakeholders involved, to consider how the account is managed and shared throughout the organization.

Secondly, after implementation, the system continues to be developed incrementally and with less resources and urgency. The maintenance and further development is in hands of a national agency of the Department of Economic Affairs. While sending messages we found that we could choose from a dropdown list of government institutions. Some of the municipality names were misspelt however and could therefore not be contacted. In our communication with one of these municipalities we found, unsurprisingly, they had not received any messages as of yet.

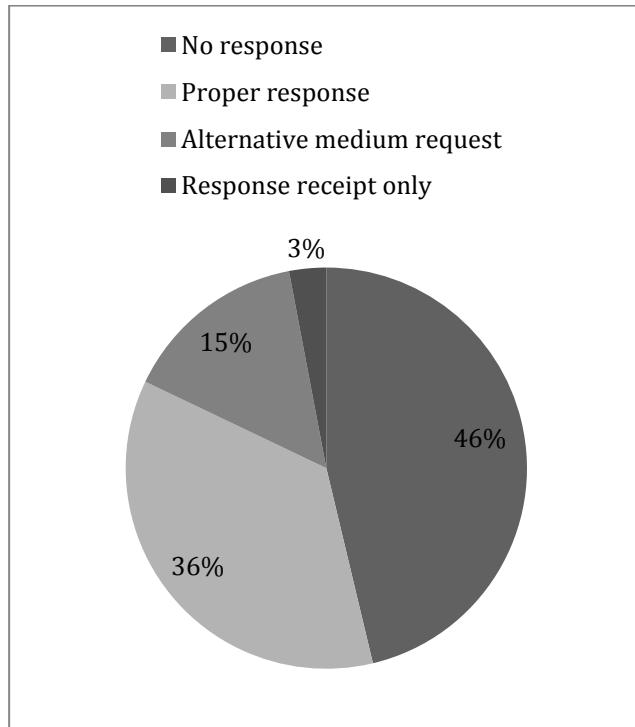


Figure 2: PSC response behavior (n=67)

Thirdly, it seems that security issues have led to decreased functionality. In principal the communication only happens between the service provider and the authority in question. Because of this, one has to login to the system continuously as a service provider or municipality; the system cannot be integrated with other communication systems without significant investments in technical adjustments. A special issue related to security is the necessary cross-border infrastructure for authentication and identification. That is, the Netherlands has different digital identification infrastructure than other member states and interoperability is a point of concern. To facilitate non-national service level providers, in the Netherlands one can currently login through the Dutch identification service, but can also choose an account name for their organization. We chose for the second option as our organization was fictional, which means governments possibly do not obtain registration or other details from users they communicate with.

In examining the use of the PSC by 67 Dutch municipalities we found that the system is not used frequently and enjoys little satisfaction (see Figure 2 on PSC response behavior). Less than half (46%) of the total amount of municipalities reacted to the request that was sent to them. A little over a third (36%) gave an adequate and timely response (within three weeks) to the request. Eighteen percent gave what we named inadequate answers by either sending a confirmation message and nothing else, or asking us to contact them through an alternative medium (telephone, email or face to face). Although the ‘alternative medium requests’ can be interpreted as service delivery, we see them as conflicting with the original purpose of the MB-system and its ambition to facilitate digital inter-European communication between municipalities and companies. I.e., a plumber from Krakow will not be able to easily visit a local Dutch municipality. In our analysis we separated the results in large, medium, and small municipalities but no significant differences were found in their response behavior.

An important cause for the infrequent use of the MB-system is the lack of familiarity amongst companies; in assessing the results we found that national companies and especially international companies do not use the facility frequently. The majority of municipalities (85%) stated they received less than one message per month through the MB-system, while the remaining respondents stated the number was unknown. One third of the municipalities told us our message was the first one they had ever received. Moreover, the lack of use has led to the absence of routine. Each time a message is received, the recipient has to rediscover the basics of the system. The Ministry of Economic Affairs, which manages the system, told us many password recovery requests were sent to their office in the days after we sent our mystery-shopping request. Nationally, the PSC is used by a handful of Dutch companies and approximately 150-200 messages are sent on a weekly basis (interview policy officer Ministry of Economic Affairs July 9, 2013). The numbers for cross-border use are negligible.

The lack of promotion of the MB-system by the government may be a direct cause of its small user base. Besides this, respondents mentioned various alternative digital platforms companies can use and question why they should invest in ‘yet another platform’ as ‘contacts with business is already sound’. One municipality official stated: ‘If a big company wants to settle here, do you really think we’ll ask them to process their permits online? Of course not, I’ll invite them over for coffee, see if an alderman has time, and welcome them appropriately’. Besides alternatives, the MB’s lack of features and user-unfriendly interface are seen as another cause for the low usership. Some municipalities say they are consciously silent about the service to companies because of this reason, and few also stated they are waiting until a more stable and improved version will appear.

Multiple respondents criticize the ‘anonymous atmosphere’ the MB-system has. Hereby they point at the MB-system’s functionalities, which don’t allow messages to be sent to individuals (but only to municipalities or other state organs). Also, messages cannot be forwarded to individual email-addresses or colleagues, which causes frustrations with the officials checking the initial messages. Some respondents copy and paste the messages to their own email-system and forward it from there, while others pass on the key to the system to other users.

The successful use of the MB-system is largely dependent on the manner in which it was originally introduced and implemented in municipalities. Only a quarter of our respondents mentioned that

their organizations paid attention to this by organizing workshops, starting up a project on the MB-system, or circulating news about the system. From a national point of view no guidelines were provided as to how it should be used from an organizational standpoint, which may explicate why we found so many different ways of organizational embedding. In general, our research shows three different manners in which the investigated municipalities managed the account:

- **The keyholder:** one person keeps the key and responds to requests
- **The key distributor:** one person sends the key to the appropriate person
- **Network of key duplicates:** the key is duplicated and spread amongst the organization

Mostly, either the department of economic affairs or the receptionist was the main key holder, but we found a wide diversity of other actors and departments to be involved as well.

Through our interviews into the practicalities of the system we received mixed answers. Very few respondents were aware of the European dimensions of the PSC-system, and quite some users pointed their fingers at The Hague (where the Dutch government resides) to state their discontents with it. For instance, some users did not understand why 'The Hague' was implementing this system and mentioned they were not fully informed about the strategic goal for public value it has. Four municipalities ($n=20$) were positive about the system however and stated it makes their work easier, while the majority (7 users) was unsure about its potential. A quarter of our interview respondents stated there had been explicit communication and/or training concerning the implementation of the system, although this had not been recent and most respondents stated they either had a different job at the time of implementation or could not remember such communication. Because municipalities had little experience with it they found it difficult to assess how the MB-system has changed their relation with service providers. None had had interaction with service providers from different member states and one mentioned they had had complaints from local companies who found the system was not user-friendly. Few municipalities actually communicate about or promote the system itself to companies, while one respondent stated this is because of embarrassment about the instability of the system.

6. CONCLUSIONS AND DISCUSSION

The services directive strategically aimed at the improvement of cross-border cooperation within the internal service market in Europe. One of the main instruments to achieve this was the implementation of the PSC in the member States. Our research shows that in the process of being translated from the original supranational requirements to a national, subnational and finally user-level, the implementation of the PSC went "lost in translation".

The actual impact of the PSC, more than three years after the compulsory implementation of this facility, on digital interactions between government and firms and business is negligible. Two main factors seem to contribute to these findings, namely the multilevel implementation process of the MB-system, and the design process regarding its technical features.

First of all, the implementation by the MB-system from the supranational to the subnational level within the municipalities was largely an administrative affair, where attention on

organizational issues was lacking. Also the positioning of the MB-system within the eGovernment strategy of the municipalities received too little attention. The MB-system turned out to be 'a strange duck in the cracks', with few supporters within the municipality organizations. To add to this, the target group of end-users, firms and businesses, was hardly informed about the existence and functionality of the MB-system.

Secondly, there was no user-centric design process involved for the MB-system. Due to the pressure to implement on time, a very basic design was developed and distributed. Neither subnational governments that needed to implement this facility, nor firms and businesses that needed to use this facility, were closely involved in the design. After implementation little budget was assigned to the further development of the system.

Regarding the multilevel setting where the Services Directive was implemented, discussion needs to take place how to improve the involvement of implementing authorities like municipalities, and firms and businesses as actual end users. This is not the place to describe a redesign of the EU-design of policy making, but we suggest a serious assessment of the way eGovernment impact is treated in EU policy making as we found an absence of the user's involvement at all levels of the described governance triangle. We therefore recommend two general measures.

First, during the phase of eGovernment policy development, the EU needs to do assessments and consultations on the impact of eGovernment systems that are meant to be implemented as a means to reach certain policy goals. In this assessment, special attention needs to be paid to the subnational authorities that have to do the actual implementation, next to the final end users. In MLG terms, the various actors should interact more closely in a manner that values non-hierarchical exchanges at different levels. Of course, this relates to subsidiarity, one of the main principles for demarcation between the EU and the national authorities. In our opinion, subsidiarity should not be a non-intervention measure when it comes to the improvement of the quality of EU policies.

Second, the EU should not only monitor the legal implementation of her policies, but also the delivery of public value by studying actual implementation, especially if eGovernment services are required. The current monitoring on national implementation and compliance of EU regulations and directives is largely focused on legal aspects. Also, guidelines for implementation of EU policies are mainly stated in legal terms. When it comes to facilitating and monitoring the actual implementation of eGovernment systems, including use and user experience, there is a lot of ground to cover. Attention should not only be paid to eGovernment service providers such as municipalities, but also to the national infrastructures they use, such as the MB-system.

We started this article with the notion of public value. In our opinion eGovernment can make a large contributions to the delivery of public value. But to reap these benefits in a multilevel setting as the EU, in designing and implementing policies, measures need to be taken to make the user a full-fledged partner to supranational, national and subnational officials in both the development as well as the implementation process regarding eGovernment systems. We stress this particularly because it is their eyes that behold the beauty of public value.

7. ACKNOWLEDGMENTS

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