

Remissvar Infrastrukturdepartementet Dnr I2021/03265

220318

Google Sweden AB tackar för möjligheten att lämna synpunkter på slutbetänkandet i It-driftsutredningen remiss **Dnr I2021/03265**. Nedan följer våra kommentarer på engelska. Vi finns givetvis tillgängliga för eventuella uppföljande frågor eller annat vi kan bistå med i arbetet.

Google Sweden welcomes this opportunity to provide official comments on the final report from the government inquiry into secure and cost-effective IT operations.

Digital infrastructure and cloud services enable the modernization of the public sector, in turn producing better services for Swedish citizens. Due to the Covid-19 pandemic, we have recently seen an increase in the speed of the digital transformation efforts of public sector organizations as employees have to work from home and citizens require new digital services. Digital transformation highlights the need for cloud services, data-driven capabilities, cybersecurity, and information security. At the same time, the Swedish public sector is being called upon to deliver more with less resources. As many public sector organizations offer similar services we welcome collaboration on coordinated IT operations and a common service offering. We also support that the inquiry proposes that the connection to the common service offerings be voluntary.

It is essential for the Swedish public sector to have access to state of the art technology that is easy to use, cost-effective, secure and fully compliant with Swedish and European regulation. The summary of the inquiry states that "...coordinated IT service offering shall consist of services delivered by private suppliers and a coordinated public service offering". We would like to highlight the value of a digital ecosystem with collaboration between private IT vendors at the global forefront of technology and public sector organizations that can leverage that knowledge when delivering secure and cost-effective services to citizens. As security is at the top of the policy agenda we would also like to emphasize that having firms in the digital ecosystem with leading security expertise will become even more important when developing secure public cloud solutions. We have identified a few areas in the proposal put forward in the inquiry that could potentially be improved further.

Possible improvement areas cover:

- To a large extent the proposal has chosen not to call for bids in the public procurement procedure for the coordinated service offerings, sold by the four subcontractor agencies. The common services offered will be purchased through agreements within the state i.e. agreements between two government agencies (see section 6.8.3 and 8.3.4 and 10.5). Although this is lawful it can be limiting as the public sector may not benefit from a broad



range of possible bidders, compare and select the best bidder.

- The proposal recognizes that the four subcontractor agencies can be perceived as private companies as they will sell IT services to the public sector customers (see section 11.9.1). This can be limiting as the services sold by the subcontractor agencies, to a large extent, will not be open to competition from IT firms on the market. The technological frontier is moving fast and innovative new products may only be available on the free market thus making it difficult to incorporate in the common services offered.
- The selection of the four subcontractor agencies, i.e. The Swedish Insurance Agency, The Swedish Mapping and Land Registration Agency, The Swedish Tax Authority and The Swedish Transport Administration, delimits the actors that can participate in the digital ecosystem and may put a strain on the connection to new products and knowledge produced in the global digital innovation system.
- The challenges and risk section (11.12) of the report shows that during the course of the inquiry several actors have identified the risk that, as the IT services will not be procured by private firms that sell IT services as their core business, the digital service may be substandard and slow down innovation in the public sector.
- Evidence in the inquiry shows a large interest in the common services offered which is positive but also means that the impact on the market competition is not negligible as highlighted in the impact assessment (section 12.2).

To use the transformative power of the public cloud to the full extent, we would like to emphasize the importance of providing clear technical and security guidance and develop frameworks for certain use cases (e.g. such as transferring and processing of sensitive data). These frameworks need to be created in a way that allows for flexibility, innovation and be digitalisation friendly.

Public sector organizations need access to world leading private IT providers that can deliver cutting-edge technology that is cost-effective and secure. We therefore propose that a forum is established where the agencies tasked with implementing the common service offering, the coordinating agency and private IT vendors meet to discuss user needs and the most secure and cost-effective IT services that can meet these needs.

We would welcome an opportunity to discuss how the proposal can be further improved.

Best regards

On behalf of Google Sweden

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