CHAPTER 10

SPAIN

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I. Is there a national act containing a legal definition of Automated Administrative Decisions?

Law 40/2015, of 1 October, on the Legal Regime of the Public Sector (Law 40/2015) defines the basic elements of automated administrative actions, security requirements, and transparency standards. This law was implemented by Royal Decree 203/2021 of 30 March, approving the regulation on the performance and functioning of the public sector by electronic means (Royal Decree 203/2021).

These are basic regulations to be applied to all Spanish public administrations (the National Government, the governments of the Autonomous Communities (regions), and the local authorities).

According to these regulations, an automated administrative action is understood to be "any act or action performed entirely by electronic means by a public authority in the context of an administrative procedure without the direct intervention of a public sector employee."

An automated administrative action is characterised by three elements.

Firstly, it is an action performed by electronic means. Although neither Law 40/2015 nor Royal Decree 203/2021 defines what should be understood by electronic means, it has generally been taken to mean any digital medium, and artificial intelligence in particular.

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This article was completed in October 2024. Since then, some regulations governing automatization and the use of artificial intelligence in public administration have been enacted in Spain (most notably, Law 2/2025, of April 2, for the development and promotion of artificial intelligence in Galicia). Additionally, the Spanish Supreme Court has issued a significant ruling regarding the disclosure of algorithmic source code (ECLI:ES:TS:2025:3826). Finally, numerous articles and books on the regulation of AI within Spanish public administrations have been published. For a comprehensive overview, see A. Cerrillo i Martínez, C.I. Velasco Rico, *La regulación de la inteligencia artificial en España: una propuesta normativa para su uso en las administraciones pública* (2025); M. Vaquer Caballería, J. Pedraza Córdoba, *La actuación administrativa automatizada: sus claves jurídicas* (2025).

Secondly, it is a formalised action performed in the context of an administrative procedure. Traditionally, simple, routine, and bulk tasks have been automated, such as automatic file pagination, the automatic migration of electronic documents, document digitalisation, or data sharing between government bodies. However, with the use of artificial intelligence, the possibility has been suggested of automating other more complex tasks such as issuing reports or decision-making.

Thirdly, it is an action which takes place without the direct intervention of a public official or employee. However, it has to be taken into account that the Basic Statute of Public Employees (Article 9.2 of Royal Legislative Decree 5/2015 of 30 October) lays down that functions involving the direct or indirect participation of public powers must only be performed by civil servants.

Law 40/2015 provides some mechanisms for supervising this kind of automation. It establishes that before a government action is automated, the body or bodies responsible for defining the specifications, programming, maintenance, supervision, and quality control of the automated administrative action must be determined. It also establishes that public administration bodies may choose to audit the information system and its source code. Finally, the public administration in question is required to define the body to be held liable in cases of legal challenges.

In applying the basic regulation, different Autonomous Communities have set more detailed and precise rules for automated government. Some of these regulations seek to drive or encourage the automation of administrative bodies (for example, Galicia's e-Government Law 4/2019 of 17 July establishes that the regional government and public sector must foster automated government acts). Others pose limits on the automation of the exercise of official powers. Thus, Aragon's Law 5/2021 of 29 June on the Organisation and Legal Regime of the Regional Public Sector rules that "automated administrative actions will not be considered when subjective decision-making criteria must be applied, whether individually or collectively" (Article 43).

In fact, one of the most-discussed aspects relating to automated administrative actions in Spain is whether it is possible to automate the exercise of discretionary powers. Ponce, for example, considers that "certain decisions must be reserved for humans to make, which we call here a humanity reservation" (or human-in-the-loop) and recommends

"prohibiting the use of AI in the exercise of discretionary powers"[1]. In contrast, other authors, such as Huergo Lora, consider that "it is perfectly possible and valid for a public administration to use, among other factors, algorithmic predictions" in the case of discretionary powers[2]. As we have observed in detail elsewhere[3], there is no one-size-fits-all response to the question of whether the automation of discretionary powers is possible in cases where the electronic means can make decisions of the same or better quality as those made by humans.

II. Is there a general legal basis (either at the constitutional level or in the Administrative Procedure Act) for the use of algorithmic automation and/or artificial intelligence (AI) by public authorities (government, agencies, local authorities, and specialised bodies)? If no such legal basis exists, are there any legislative provisions that permit public authorities to experiment with algorithmic automation or AI?

There is no general Spanish law on the use of artificial intelligence by public authorities. However, there are several different regulations which, more or less directly, define the legal regime to be considered.

As a starting point, we must discuss the constitutional principles determining the functions of public authorities. These state that public bodies must serve the general interest with objectivity and act according to the principle of effectiveness (Article 103 CE), among others. They must also ensure respect for the fundamental rights set forth in the Constitution of Spain, particularly in Article 18.4 CE, which rules that "the law shall restrict the use of data processing in order to guarantee the honour and personal and family privacy of citizens and the full exercise of their rights".

At the legal level, the introduction of artificial intelligence into public administrations must be done in accordance with the principles of the performance of public authorities as regulated by Law 40/2015 (Article 3), applied in relation to the use of electronic media in Royal Decree 203/2021 (principles of transparency, equality and non-discrimination, personalisation, and proactivity).

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[1] J. Ponce Solé, *Inteligencia artificial, Derecho administrativo y reserva de humanidad: algoritmos y procedimiento administrativo debido tecnológico*, 50 Revista General de Derecho Administrativo (2019).

[2] A. Huergo Lora, *Una aproximación a los algoritmos desde el derecho administrativo*, in A. Huergo Lora (ed.), *La regulación de los algoritmos* (2020).

[3] A. Cerrillo i Martínez, *¿Son fiables las decisiones de las Administraciones públicas adoptadas por algoritmos?*, 1 European review of digital administration & law 17 (2020).

We should also mention Law 15/2022 of 12 July on equality and non-discrimination (Law 15/2022), the first Spanish law to include a reference to the use of artificial intelligence and automated decision-making mechanisms by public authorities (Article 23).

In particular, this regulation states that public authorities must favour the introduction of mechanisms ensuring that the algorithms they use in decision-making take into account the criteria of transparency, accountability, and the minimisation of bias, where technically feasible. It also states that they must prioritise transparency of design and implementation, also ensuring that their decisions are interpretable. To this end, public authorities must produce impact assessments determining any possible discriminatory bias. These mechanisms must be adopted in the framework of the National Strategy on Artificial Intelligence, the Charter of Digital Rights, and European initiatives on artificial intelligence promoting the use of ethical, trustworthy artificial intelligence that respects fundamental rights.

Law 15/2022 identifies the basic elements that must underpin the use of artificial intelligence by public authorities, but it refers to general principles and soft law regulations without giving a specific regulatory response able to provide sufficient guidance on legal certainty or transparency.

Along similar lines to Law 15/2022, the Autonomous Community of Extremadura approved Legislative Decree 2/2023 of 8 March on urgent measures to promote the use of artificial intelligence in Extremadura, regulating measures to support, promote, drive, and develop artificial intelligence systems, various general-interest and priority initiatives to invest in artificial intelligence, and, lastly, the use of artificial intelligence by the regional government. In particular, it ruled that the regional government may adopt government actions through artificial intelligence systems within the framework of an administrative procedure in relation to the digital rights of the public as set forth in the Charter of Digital Rights and the European Declaration on Digital Rights and Principles for the Digital Decade (Article 11). It provides various safeguarding mechanisms. For example, the decision-making mechanism used should be published in different ways, there should be specific reference to the impact of using artificial intelligence systems in the provision of public services; and the body responsible for such administrative procedures should record its checks of the logical process designed to execute the actions, the risks involved, and any other aspects affecting the rights of interested parties in the Government Information Inventory (Article 12).

Lastly, apart from the regulations cited above, other instruments have been proposed in Spain to help determine the guarantees to be adopted or the procedures to follow if using artificial intelligence.

Here, the Charter of Digital Rights approved by the National Government in June 2021 is of particular interest. The Charter of Digital Rights is not regulatory, although it does specify or define some of the rights recognised in regulations concerning the digital sphere. In particular, the Charter includes several rights relating to the use of artificial intelligence by the public authorities.

Similarly, the internal protocol of Barcelona City Council, "Definition of work methodologies and protocols for the implementation of algorithmic systems", states the commitment of the municipal government that any artificial intelligence system used in the municipal context must be used in accordance with legal, ethical, and technical standards, and that in cases where high-risk artificial intelligence systems are used, the Advisory Council on Artificial Intelligence, Ethics, and Digital Rights must draft an algorithmic impact assessment, and the system must be recorded in a municipal algorithm register.

III. Do public authorities rely on algorithmic automation/AI in their daily operations? If yes, to what extent? Which areas are most affected by automation (e.g., security, policing, immigration, transport, tax management, welfare, health and employment services, education, justice, or digital identity)?

Spain has no registries or inventories recording automated administrative actions or cases where artificial intelligence is used by public authorities.

However, some recent studies and announcements have reported various initiatives[4].

The more long-term cases of automated administrative action, some of which also include artificial intelligence, are in the field of preventing and combating gender violence (Viogén), detecting false allegations (Veripol), and risk assessment and management among the prison population (Riscanvi).

Apart from these initiatives, other projects have emerged in recent years which, to varying degrees, are more innovative and experimental.

[4] Autoritat Catalana de Protecció de Dades, *Intelligència Artificial. Decisions Automatitzades a Catalunya* (2020); Digital Future Society, *Algorithms in the public sector: four case studies of ADMS in Spain* (2023).

Artificial intelligence is being used in public services such as healthcare (for example, in the Ministry of Health for early detection of disease outbreaks and in the Government of Catalonia for diagnosis), social services (Barcelona and Girona City Councils), public transport (e.g., the Government of the Basque Country, and Barcelona City Council), promoting tourism (e.g., Madrid City Council), or public safety (for example, Malaga City Council, using a robot dog).

Artificial intelligence is also being used in citizen advice services (for example, the State Public Employment Service uses chatbots to provide information on unemployment, job-seeking, and other services relating to employment, and the Government of Navarra uses virtual assistants to answer tourist enquiries).

Elsewhere, artificial intelligence is used to detect fraud and corruption. For example, the Tax Agency employs AI to identify tax evasion, recognise patterns of fraud, detect evasion patterns, and take preventive measures. Social Security uses it to review sick leave records, and the Government of Valencia applies it to uncover irregularities and corruption cases or breaches of regulations, such as illegal holiday lets in Valencia.

Artificial intelligence is also used in the service of various public policies. For example, Valencia City Council uses AI to monitor air quality and manage pollution.

Some government bodies have begun using artificial intelligence in administrative paperwork (for example, the City Councils of Madrid and Sevilla use it to process building permits).

Lastly, there have also been some experiments using artificial intelligence to analyse big data in order to detect needs (for example, by Madrid City Council to find elderly people in isolated situations).

IV. What legal requirements – e.g. in terms of privacy, cybersecurity, quality of the datasets, impact assessments, transparency obligations, access to codes, the right to explanations, compulsory human involvement, and the right to obtain a review or remedy – apply to the use of algorithmic automation or AI by public authorities? Are there sector-specific regulations on Automated Administrative Decisions (e.g., public procurement, taxation etc.)?

In terms of data protection, Spanish legislation adds no further guarantees to those of Article 22 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data

and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation).

Regarding access to the source codes of the algorithms, it should be noted that Spanish e-government regulations recognise the technological neutrality principle, guaranteeing both that interested parties can freely choose the technological options they prefer to interact with public administrations and the public sector, and the freedom to develop and implement new technologies in a free market. To this end, they require the public sector to use open standards, and, where applicable, standards that are in general use (Article 2.a, Royal Decree 203/2021). Despite this, in practice Spanish public authorities do not generally use software based on open standards, nor do they publish their source codes.

Spanish legislation does not recognise the right to explanations about decisions made by an algorithm. However, it must be noted that Article 35 of Law 40/2015 establishes an obligation to state reasons for government actions; for example, when they limit individuals' rights or legitimate interests, or when they fall within the exercise of discretionary powers. Apart from this general provision, the Charter of Digital Rights recognises that the development and life cycle of artificial intelligence systems "must establish conditions of transparency, auditability, explicability, traceability, human supervision and governance. In all cases, the information provided must be accessible and comprehensible" (Section XXV).

As we mentioned above, there is academic debate in Spain on the need to guarantee human supervision when public administrations use artificial intelligence, especially in relation to the exercise of discretionary powers. The existing legislation does not yet require any such intervention. Nevertheless, the Charter of Digital Rights states that "discretionary decisions are to be made only by people, except where regulations allow for automatic decisions to be made with suitable guarantees" (Section XVIII).

Spanish law provides various mechanisms for controlling automated decision-making using artificial intelligence. Before it is established, tests must be performed in supervised, closed testing environments (sandboxes). Similarly, Royal Decree 817/2023 of 8 November establishes a controlled testing environment for checking compliance with the proposed Regulation of the European Parliament and Council, establishing harmonised standards for artificial intelligence. *A posteriori*, as we have seen above, the supervision and auditing of artificial intelligence systems have been envisaged, together

with monitoring the decisions made through these systems. However, beyond the broad reference of Law 40/2015, Spanish legislation does not provide specific mechanisms for monitoring decisions made using artificial intelligence.

Another important mechanism is the creation of a Spanish Agency for the Supervision of Artificial Intelligence to supervise the use of artificial intelligence systems[5]. This agency has public legal status and its own equity and autonomous management, with administrative powers, and will be organised and act fully independently of the public administrations. In particular, Law 28/2022 of 21 December on fostering the start-up ecosystem rules that the agency's purposes will include "supervision of the launch, use, and commercialisation of systems including artificial intelligence, especially those which may pose significant risks to health, safety, and fundamental rights" (Additional Provision 7). To this end, the agency's responsibilities will include "supervision of artificial intelligence systems to ensure compliance with Spanish and European regulations on artificial intelligence as applied in the use of this technology, the responsibility for which will be assumed by the agency" (Article 10.1.k of the Statutes of the Spanish Agency for the Supervision of Artificial Intelligence approved by Royal Decree 729/2023 of 22 August).

Regarding security regulation, it should be noted that in general, public authorities are subject to the principle of security of the systems and solutions each one adopts (Article 3 of Law 40/2015). The mechanisms to guarantee this principle are defined in the National Security Scheme, known as the ENS (Article 146 of Law 40/2015, approved by Royal Decree 311/2022 of 3 May). The ENS is intended to create the necessary conditions of trust in the use of electronic means through measures to guarantee the security of electronic systems, data, communications, and services, thus enabling both the general public and public administrations to exercise their rights and fulfil their duties through these means. The basic principles of the ENS include integrated security, risk-based security management, prevention, detection, response, and maintenance, the existence of lines of defence, continuous surveillance and regular reassessment, and the differentiation of responsibilities. The minimum requirements set by the ENS are obligatory when developing the security policies adopted by public

[5] Additional Provision 130 of Law 22/2021 of 28 December on the 2022 General State Budgets.

administrations and applicable when they perform automated administrative actions.

Along with the development of these principles, when public administrations perform automated administrative actions, they must adopt the necessary security measures to guarantee the identity of the body to which the automated decision is attributed, that the automated decision reflects the intention of the administrative body, and that this intention has not changed. Similarly, Law 40/2015 provides that each public administration must determine the cases in which electronic signatures will be used, and the systems used to do so in the automated exercise of powers (Article 42). In particular, the electronic signature systems envisaged are the electronic seal of the public administration, body, government organisation, or public-law entity, using a recognised or qualified electronic certificate which meets the requirements of the legislation on electronic signatures, and the secure verification code linked to the public administration, body, government organisation or public-law entity which must permit the integrity of the document to be validated by access to the corresponding e-Office.

Regarding the transparency of the administrative action, Law 19/2013 of 9 December, on transparency, access to public information, and good governance, which regulates the public information public administrations must provide through their transparency portals, makes no reference to automated administrative actions. Neither do most of the transparency regulations approved by the Autonomous Communities.

Transparency does figure in Royal Decree 203/2021, which rules that public administrations must make information relating to automated administrative actions, among other content, available to interested parties on their e-Offices (Article 11.1.i). In particular, it provides that e-Offices must publish an updated list of automated administrative actions, each with a description of its design and functions, its accountability and transparency mechanisms, and the data used in its configuration and learning process.

Similarly, some of the regional regulations on automated administrative actions also provide that "the rulings on actions are located in the e-Office of the administration of the Generalitat de Catalonia" (Article 54.2 of Decree 76/2020, of 4 August, on e-government). In particular, these rulings will be issued before the automated action comes into use and must include the definition of the specifications, programming, maintenance, supervision, quality control, and, where applicable, auditing of the information system and its source code, and identify the responsible body if the automated government

action should be contested. A similar ruling appears in Law 4/2019 of 17 July on the e-government of Galicia, establishing that "the e-Office of the Xunta de Galicia and the "Diario Oficial de Galicia" will publish the full text of the rulings indicated in the previous section".

A more general provision on algorithm transparency appears in Law 1/2022 of 13 April on Transparency and Good Governance in the Community of Valencia, which rules that public administrations must publish the list of algorithmic or artificial intelligence systems impacting administrative procedures or public services. This list must include a clear description of their design and function, the level of risk they present, and a point of contact in each case in accordance with the principles of transparency and interpretability (Article 16.1.l).

Lastly, some public authorities are driving the creation of registers of artificial intelligence systems in order to ensure transparency in artificial intelligence. In 2023, Barcelona City Council approved a government measure with a municipal strategy, specifically including the creation of a municipal register of artificial intelligence algorithms, intended to be a space that would gather and publish all the available information on the algorithms used by Barcelona City Council when providing services[6]. Similarly, and most recently, the Government of the Generalitat de Catalonia adopted Agreement GOV/45/2024 of 27 February, creating an Artificial Intelligence Commission and establishing measures on artificial intelligence[7]. In particular, this agreement provides for the creation of a Register of the Catalan Government's artificial intelligence systems, which must contain information on the systems using artificial intelligence and other algorithms in its public services, including at least their technical documentation and the algorithms used.

There are also examples of sector-specific regulations on automated administrative actions in the General Tax Act (Articles 96.3 and 100.2 of Law 58/2003 of 17 December). Also, Royal Decree-Law 2/2021 of 26 January, strengthening and consolidating social measures protecting employment, and amending the Law on Infringements and Penalties in the Social Order, included employment law regulating the start of administrative procedures relating to Social Security via automated infringement notices (Articles 53.1.a and 130). Furthermore, Law 12/2021, modifying the Law of the Statute of Workers, of 24 March1995 states that the works council will have the right to "d) Be

[6] *https://ajuntament.barcelona.cat/digital/sites/default/files/2023-11/Mesura-de-Govern-Intel-ligencia-artificial_cat-v2.47-ca-ES_.pdf* (retrieved October 2024).
[7] DOGC no. 9112, 29 February 2024.

informed by the company of the parameters, rules and instructions forming the basis of the algorithms or artificial intelligence systems affecting decision-making which could impact working conditions, access to and maintenance of employment, including the creation of profiles" (Article 64. 4º.d)[8].

V. Who builds the algorithmic technologies used by public authorities? Are these developed by public entities, private companies, or a hybrid body?

As a starting point, it should be noted that, in principle, each public administration develops its own software.

However, it is clear that the legislation regulating e-government recognises the principle of cooperation, which, alongside other instruments, is channelled via the transfer of technology between public authorities and the reuse of software by different public administrations.

This technology transfer is made possible via directories of reusable software. According to the applicable legislation, public administrations must keep updated directories of software applications which are free to be reused, as specified in the National Interoperability Scheme. The directories of the different public administrations must be compatible and interconnected, especially with the general directory of the National Government. The Spanish Government must also keep its own reusable software applications and those in the integrated directories of other administrations available in the general directory (Article 158.2 of Law 40/2015, Article 64 of Royal Decree 203/2021, and Article 17 of the National Interoperability Scheme). The Technology Transfer Centre is the portal where the Government publishes its general software directory to encourage all public administrations to reuse solutions[9].

Specifically relating to artificial intelligence, several public administrations have recently announced their intention to create catalogues of algorithms (for example, the Regional Government of Andalusia, as well as those already mentioned of Barcelona City Council and the Government of Catalonia).

Law 40/2015 also rules that if there is a solution available for total or partial reuse, the public administrations must use it, unless the

[8] See The Ministry of Labour's Guide of May 2022, *Algorithmic information in the workplace. Practical guide and tool on employers' obligation to inform on the use of algorithms in the workplace*.

[9] *https://administracionelectronica.gob.es/ctt/ctt*.

decision not to reuse it can be justified for reasons of efficiency. Similarly, it establishes that the authorities providing and receiving the software can agree on how to allocate the cost of acquisition or creation. To facilitate reuse, Law 40/2015 rules that the software can be declared to be open source when this will lead to greater transparency in the functioning of the public authority or where it encourages the general public to become part of the Information Society. Ultimately, it requires the National Government to provide support for free reuse and will also drive the development of software, formats, and shared standards in the framework of national interoperability and security schemes.

Cooperation in the development of e-government is also stipulated in the regulations for local governments, where provincial governments and other higher-level bodies are required to collaborate to drive the use of electronic means by municipalities (Article 70bis.4 of Law 7/1985 of 2 April regulating the rules of local governments).

VI. Is there a centralised infrastructure for digital data management, or are there several infrastructures? If the latter is true, is interoperability guaranteed, and to what extent? Are there any rules or procedures governing the exchange of information between different administrative bodies?

Several public authorities in Spain have worked to establish data governance to channel decision-making and management relating to data in order to ensure their use, reuse, and quality.

One of the pioneers in this area was Barcelona City Council, which designed its data governance model in 2018[10]. According to the municipal model of data governance, "municipal data governance must allow for supervision and coordination in all actions relating to data, avoiding duplication, standardising processes, and generating synergies which will make more, higher quality, and more accessible data available." Barcelona City Council's data governance consists of different *spaces for decision-making and cross-department coordination*: the Executive Data Committee, the Cross-department Data Coordination Panel, the Sectoral Heads of Data, and the Municipal Data Office. In particular, the Municipal Data Office is a body integrating various areas and departments with responsibilities for corporate data, attached to the Municipal Manager's Office, and headed by a Chief Data Officer. The goals of the Municipal Data Office are to define and coordinate a

[10] Gaceta Municipal, 18 April 2018.

municipal data governance model based on the definition of a corporate data management strategy, to ensure compliance with the standards and regulations set out in the data strategy, to facilitate the alignment of technological tools with user needs, to introduce intensive data analysis (data science) in the city council, reinforce data sovereignty, increase awareness, availability and transparency of municipal data as a whole, drive open data and knowledge-sharing, and foster the curating, reuse, accessibility, searchability, conservation, and enrichment of data.

We can also refer to the Data Office of the National Government[11]. The Data Office has the following functions: a) designing the strategies and reference frameworks for data management and the creation of spaces for data sharing between companies, the public, and public authorities securely and with governance (sandboxes, national and European data spaces, data ecosystems for use in the public and private sector, etc.) and the mass use of data in the productive sectors of the economy via Big Data and artificial intelligence technologies; b) designing the governance policies and standards for data analysis and management which must be used in the National Government; c) developing a Competence Centre for advanced data analysis; d) training and developing mechanisms for knowledge transfer to the different Ministries and public administrations; e) technical coordination of the data-related initiatives of the different ministerial departments and public administrations in the framework of the strategies and programmes of the European Union.

Other public administrations have also created units responsible for defining or managing data policy. Examples include Navarra's Data Governance Coordination Commission and Data Office (Foral Decree 106/2022 of 30 November), and the Balearic Islands' Healthcare Data Management and Governance Subdivision (Decree 79/2023 of 22 September). Additionally, the Government of Catalonia has created the Data Ethics Committee to ensure a space for ethical considerations in the deployment of the Catalan government data model (Government Agreement GOV/6/2021 of 19 January).

Regarding interoperability, Law 40/2015 rules that public administrations must communicate with each other by electronic means, ensuring interoperability. Interoperability is recognised as a principle of digital government "understood as the capacity of the information systems, and thus of the procedures running on them, to share data and

[11] Order ETD/803/2020 of 31 July creating the Data Office Division and the Programme Planning and Execution Division in the State Secretariat for Digitization and Artificial Intelligence

enable information to be exchanged between them" (Royal Decree 203/2021).

The interoperability principle is set out in the National Interoperability Scheme (ENI) approved by Royal Decree 4/2010 of 8 January, establishing criteria and recommendations for the security, standardisation and conservation of information, formats, and software, and it is intended to ensure an appropriate level of organisational, semantic, and technical interoperability of the data, information and services managed by public administrations in the exercise of their responsibilities, and to avoid discrimination against members of the public due to their choice of technology. The ENI takes precedence over any other criteria for setting interoperability policies in the use of electronic means for citizens' access to public services.

According to the ENI, the basic principles informing interoperability are: interoperability as an integral characteristic, the multidimensional nature of interoperability, and a focus on multilateral solutions. The ENI takes the form of a set of technical interoperability standards that public authorities must follow.

Lastly, concerning information exchange between public administrations, Law 40/2015 rules that "Electronic documents transmitted in closed communication environments established between Public Administrations, government bodies, public organisations, and public-law entities will be considered valid for the purposes of authentication and identification of senders and recipients in the established conditions".