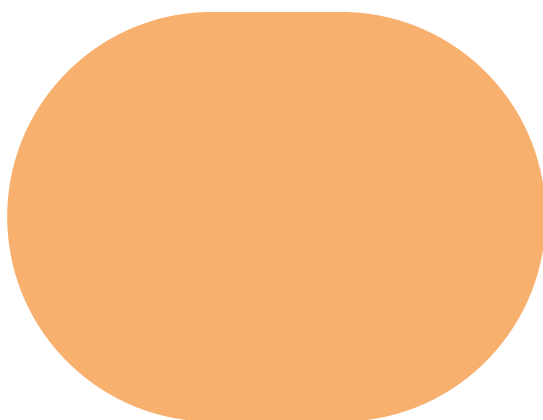


People-first Playbook

Tools and policies to
empower citizens and
consumers in Europe's
digital single market



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Executive Summary

The People-First Playbook reframes Europe’s Digital Single Market (DSM) through the perspective of the people who use it: entrepreneurs, workers, patients, students, and consumers. It argues that the DSM’s effectiveness and legitimacy depend not only on regulatory alignment or technological capacity, but on how individuals experience their interactions and empowerment in Europe’s digital environment. Calls for simplification and competitiveness will only succeed if the next phase of integration restores coherence at the level of lived experience. A digital market that works for institutions but not for people risks building digital sovereignty without legitimacy.

To explore how the DSM functions for individuals, this study applied a qualitative, systems-oriented methodology combining literature review, expert validation, and user-journey analysis. System analysis revealed a set of systemic breaks that recur across user journeys, driven by structural patterns between key actors and interaction types within the DSM. The analysis suggests that repairing these breaks requires a holistic approach in which regulatory and policy interventions (Rules) are complemented with infrastructure and automation interventions (Rails) and user-empowering tools and services (Tools). To facilitate work towards developing these interventions, the Playbook closes with concrete recommendations for key stakeholder groups with the power to shape and strengthen the DSM.

Figure 1. Overview of the Playbook

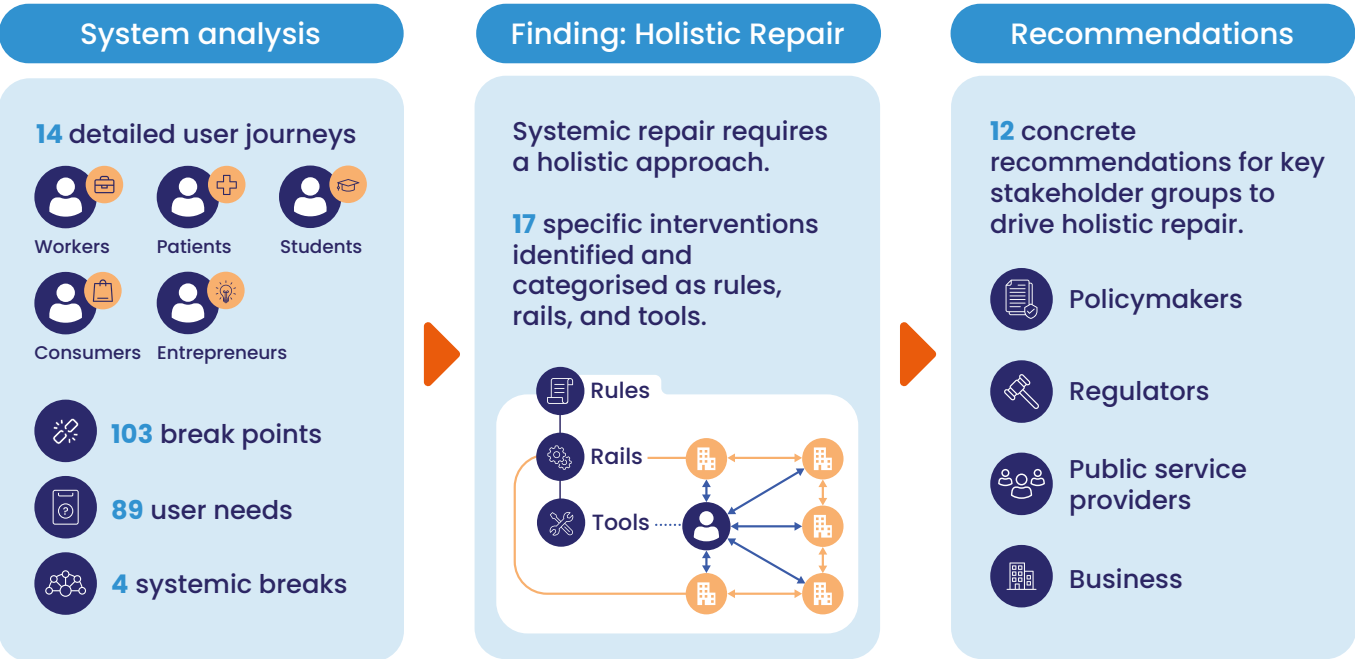
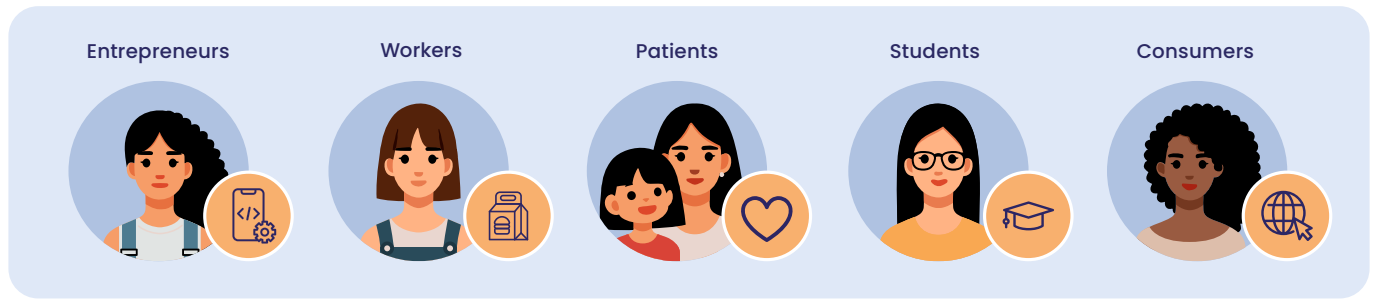


Figure 2. User types

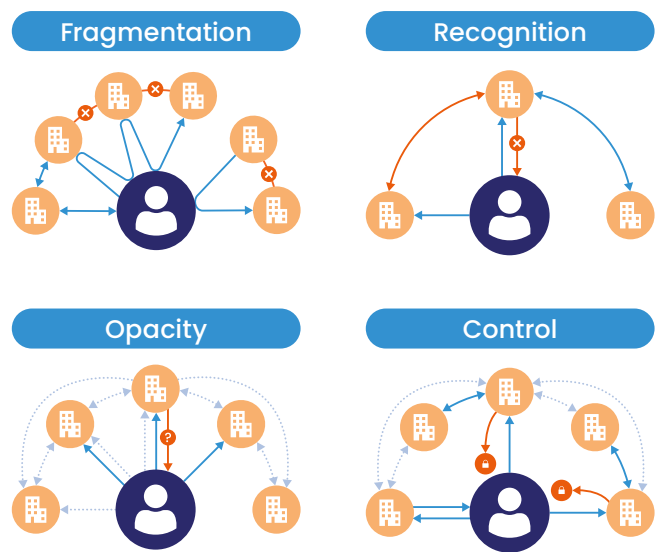


Systems analysis

Based on literature study and expert interviews, fourteen representative journeys were elaborated spanning five types of European users, including entrepreneurs, workers, patients, students, and consumers. Mapping specific personas' aims, limitations and interactions surfaced 103 specific breakpoints in digital market interactions and identified 89 specific user needs to overcome those breaks.

User Journeys, breakpoints and needs were analysed to define four persistent systemic breaks for individual users of the digital single market. **Fragmentation** occurs through repetitive registrations and incompatible systems across borders and sectors. **Recognition** gaps occur when institutions unable to acknowledge people's status, history, or contributions across contexts. **Opacity** is produced through decisions and data flows that individuals cannot trace or contest. **Control** limits manifest when formal rights to data access are not accompanied by practical tools for discovering, sharing and making use of their data.

Figure 3. Four recurrent system breaks

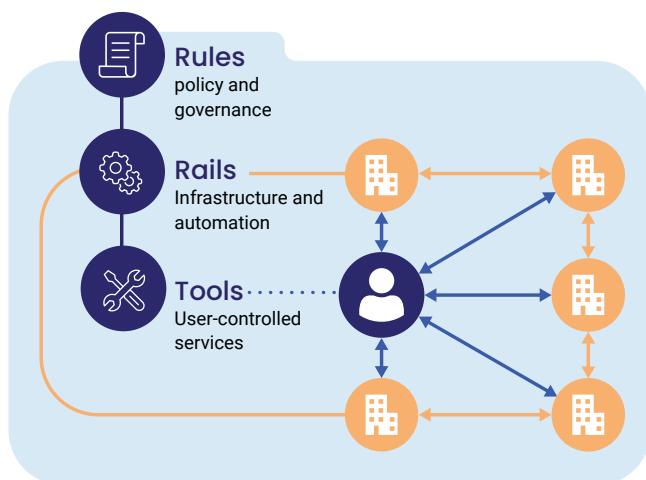


These system breaks are not isolated glitches, but the predictable results of institution-centric interoperability, the combination of centralized power and distributed responsibility, and regulatory cultures that pay little attention to user agency. Together, these factors create a digital market that is technologically advanced, yet relationally imbalanced – individual institutions or member states may operate efficiently, but cross-border cooperation and seamless interactions for ordinary people remain inadequate.

A holistic approach to repair

- 1 Rules** comprise the policy and regulation layer, aligned and simplified to smooth peoples' digital travel across borders. Examples include harmonising priorities for the 28th regime, enforcing coordinated consumer protection, and creating incentives for human-centric business models.
- 2 Rails** are the infrastructure and Regulatory Technology (RegTech) layer that automates trust, recognition, and data movement. Examples include extension of the Once-Only Technical System, deploying interoperable APIs for consent and credentials, and developing shared vocabularies and automated compliance solutions.
- 3 Tools** provide user-facing technologies that empower people and businesses to access and benefit from services and their own activity in the digital single market. Examples include transparency and consent dashboards, portable credential and benefit wallets, and personal AI assistants that help individuals navigate rights and choices confidently.

Figure 4. A holistic approach to repair interventions



None of these intervention layers can move the needle on their own. But in concert they represent a systemic approach to repair the breakpoints in individual user journeys, and the structural drivers that produce them. 17 specific interventions identified and categorised according to this holistic understanding.

Recommendations and ways forward

To begin defining, elaborating and implementing repair strategies for the digital single market requires concerted action across the stakeholder groups that wield the most influence and power in defining how the market functions.

Individuals are the most important stakeholder for this analysis, but do not have that direct influence, and should exercise their voice in democratic and market processes to urge concrete steps towards improving the DSM.

As elaborated in [Chapter V](#):

Policymakers should

- 1** Adopt an integrated DSM repair agenda
- 2** Invest in infrastructures and user tools
- 3** Raise public awareness and demand for user tools

Regulators should

- 4** Invest in the adoption of RegTech solutions
- 5** Facilitate adaptive governance
- 6** Anchor user perspectives in cross-domain regulatory cooperation mechanisms

Public service providers should

- 7** Invest in interoperable standards and infrastructures
- 8** Adopt human-centric service design
- 9** Act as lead adopters and demonstrators

Business should

- 10** Design for portability and interoperability
- 11** Collaborate towards innovation
- 12** Integrate user feedback and transparency

The recommendations in [Chapter V](#) build on the specific repair examples from each layer, and outline why investing in a people-first design for the digital single market should be a priority for each of these groups.

Designing the digital single market for people to thrive is not a political luxury but a strategic imperative. When individuals can act with confidence, moving data, credentials, and services seamlessly across Europe, they enable both innovation and accountability.

Europe's competitiveness, cohesion, and digital legitimacy depend on shifting the DSM's design to be people-first. We need a shift to prioritise the value and outcomes that people find when accessing content, benefits and services.

This playbook provides an initial set of actions to set that shift in motion. It is not a comprehensive recipe, but a rationale and a set of starting points, for policymakers, regulators, public agencies and business to ensure that reform for competitiveness is based on European values and sustainability.

I. Introduction: Context and Stakes in 2025

Europe's Digital Single Market (DSM) is one of Europe's most ambitious integration projects: a framework to enable digital activity to move as freely as goods, services, capital, and people. A decade since the launch of the DSM Strategy, the DSM has become both a symbol of European ambition and a mirror of its complexity. The market's regulatory foundations are complex, ambitious and globally influential, but also on the brink of significant reform, and the year 2025 marks a pivotal moment in the market's development.

The EU's first wave of data and digital policy leadership was marked with the launch of the European Data Strategy and kicked off a decade of foundation building. That building has been criticised for its complexity and has increasingly raised concerns about Europe's competitiveness and the ability of the DSM to deliver on its ambitions within the constraints of its regulatory foundations.¹ Recent prominent calls to action by the Letta and Draghi reports² have been met with resounding principled support, if not action. The digital omnibus the European Commission expects to present to Parliament in the final quarter of 2025³ may well provide operational guidance on simplification and reducing burdens, which can contribute to European competitiveness and have significant implications for the design and structure of the DSM.

In policy discourse surrounding these reforms and their potential, business and public sector agencies are prominent. While abstract notions of public trust and consumer protection are leveraged regularly, the experience of individuals engaging with the DSM are largely absent.

But people matter. Individual consumers and citizens were central to the Digital Market Strategy's original intention to grow the European economy, create jobs, and "trust enablers" for digital systems. Without the trust and positive experiences of people engaging with services in Europe's digital single market, there is no market.

The centrality of individual citizen, consumer and entrepreneur experiences with the DSM, and the absence of those perspectives from the current discourse of reform is a problem. It is a critically salient in the current digital

climate, where public trust in digital systems remains fragile, competition pressures are intensifying, and policymakers are asked to reconcile economic competitiveness with fundamental rights. At stake is more than convenience. The DSM's effectiveness increasingly determines Europe's social cohesion, economic dynamism, and legitimacy in global digital governance. If the DSM functions only for platforms and institutions, not for the people who use them, Europe risks building digital sovereignty without legitimacy.

The People-First Playbook responds to this challenge by reframing the DSM through the eyes of its users. It explores how individuals experience and navigate Europe's digital market — where their journeys flow smoothly, where they fracture, and how those break points reveal deeper structural tensions. In doing so, it seeks to inform the next phase of DSM development: one that reinforces Europe's strengths while repairing its weak links — ensuring that the Single Market of the future is, above all, for people.

To do so, this paper asks the following research questions:

- a Where does the EU DSM "break" for citizens, consumers, and entrepreneurs, and what unmet user needs do they reveal?
- b What kinds of interventions can best repair breakpoints in individuals' engagement with the DSM?

To provide preliminary answers to these questions, this research executed on a systems analysis of representative user journeys through the digital single market. This allowed for the elaboration of systems-level typologies for user interactions with the digital single market, including systemic breaks, key actors, and a holistic model for repair strategies.

This is a preliminary analysis based on desk research and expert review. It should be complemented and followed by empirical research and policy action. In the near term, we hope it will refocus attention towards the individual consumers, citizens, entrepreneurs that underpin Europe's digital single market, and refocus the refinement of that market to drive European competitiveness through European values.

¹ Unleashing the full potential of the internal market is listed as one of the key opportunities in Sitra Foresight Review. Source: Kiiski-Kataja, Kuukasjärvi et al. 2025.

² Draghi, 2024; Letta, 2024

³ European Commission, 2025

II. Methods and analytical design

This study applies a qualitative, systems-oriented desk research methodology to analyse how individuals engage with the EU DSM (DSM) and where systemic breaks occur. The approach combines structured literature review, expert validation, and iterative systems mapping to synthesise insights across multiple DSM domains. Rather than collecting new empirical data, the analysis integrates existing evidence, policy documents, and user-centred scenarios to reveal structural dynamics and actionable “repair strategies.” This methodological stance aligns with established approaches to systemic policy analysis⁴ and qualitative synthesis in complex policy systems⁵. It also applies human-centred design principles in digital governance research through the interpretive lens of user journeys as heuristic tools for mapping socio-technical systems.⁶



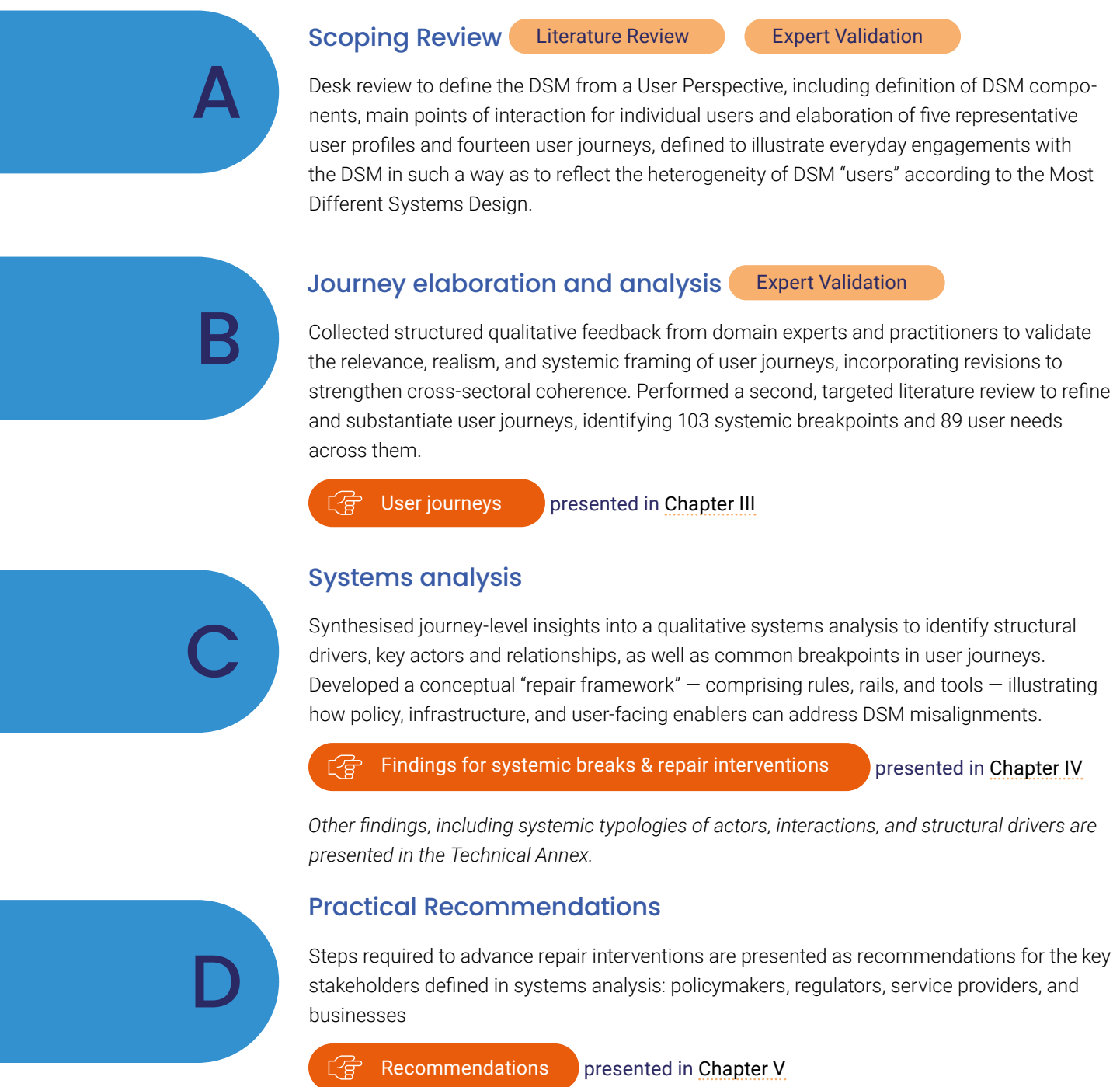
⁴ Cairney & Geyer, 2015; Meadows, 2008

⁵ Stauffer et al, 2022

⁶ Stickdorn, Hormess, Lawrence, & Schneider, 2018

Specifically, the analysis proceeded in the following four stages:

Figure 5. Analytical stages



Core to this approach is the elaboration of user journeys as understood in the field of service design. This approach applied a simplified adaptation of Endmann et al’s (2016) process to elaborate the process that a person goes through to accomplish a goal, showing the sequence of touchpoints between the user and the service, and highlighting the user’s feelings, motivations, and questions along the way.

Five specific types of users were defined to explore how people engage with the digital single market.

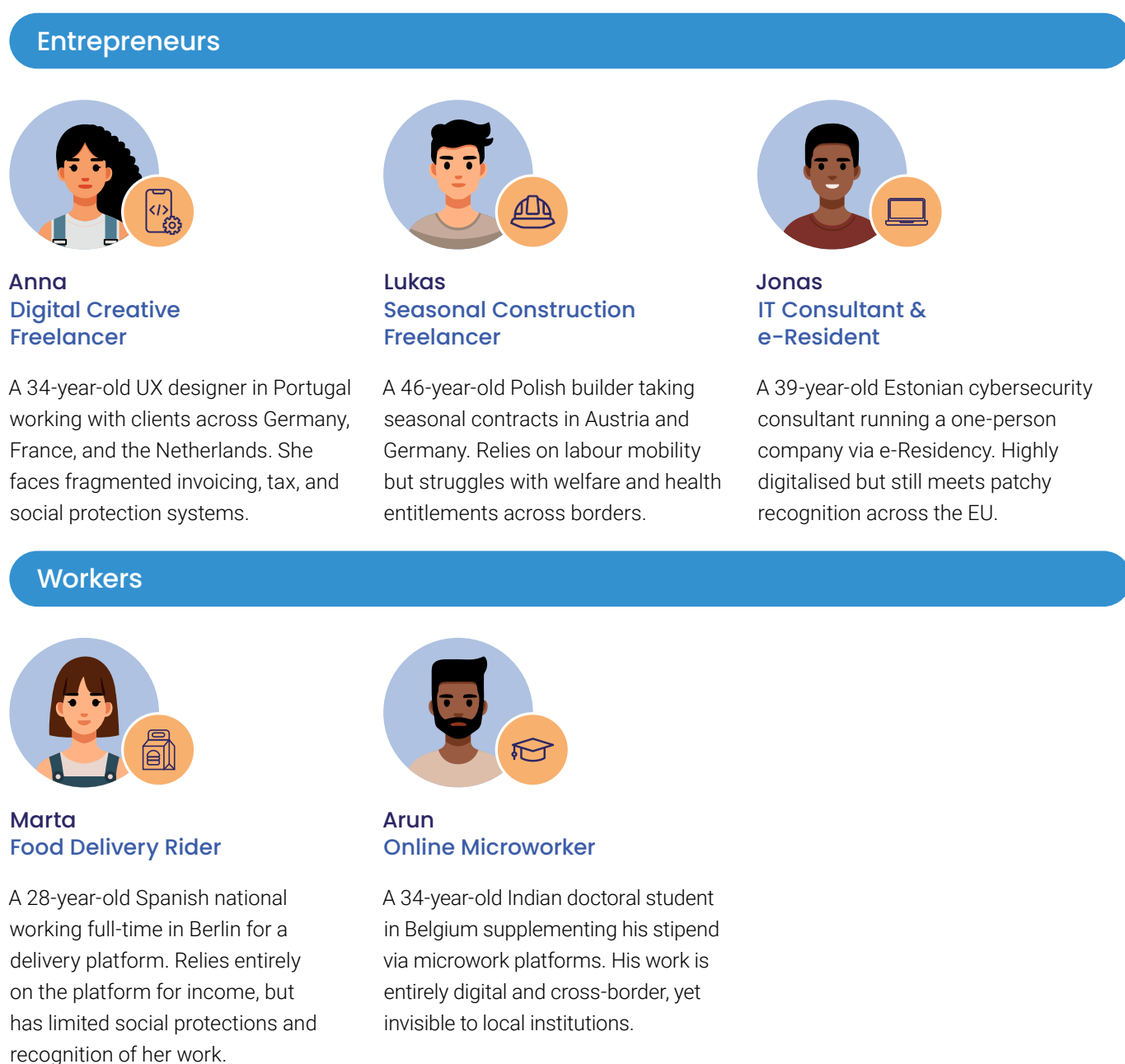
- 1 **Entrepreneurs** and cross-border freelancers, such as a designer, developer, or consultant, working remotely across EU borders, who must navigate fragmented systems for taxes, invoicing, and social protections.
- 2 Platform-based gig **workers** providing services through digital labour platforms like delivery or ride-hailing who face opaque algorithmic management, unstable income, and limited access to social security.

- 3 Chronic-care **patients** managing long-term health conditions across borders, who need continuity of treatment, prescriptions, insurance, and health records but encounter fragmented and non-interoperable health systems.
- 4 Mobile **students** moving between EU member states for study or internships, who require seamless enrolment, recognition of qualifications, and access to services, but struggle with fragmented identity and record systems.

- 5 **Consumers** engaging with cross-border e-commerce and digital services often face barriers like geo-blocking, inconsistent consumer rights, and gaps in data portability and transparency.

Each of these groups contains a significant amount of variety and heterogeneity. No two people engage with the DSM in the same way. 14 specific personas were elaborated across these groups in order to capture that diversity and prompt the identification of a broad swatch of issues, while maintaining enough simplicity and comprehensibility to facilitate analysis.

Figure 6. Overview of personas



Patients



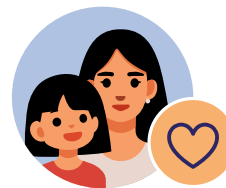
Elena
Resident Chronic Patient

A 52-year-old teacher in Italy with diabetes, receiving ongoing care in her home country. Relies on national systems but has occasional touchpoints with cross-border suppliers, apps, and specialist consultations.



Johan
Mobile Worker with Chronic Condition

A 44-year-old Dutch engineer living in Belgium with an autoimmune condition requiring regular treatment in both countries.



Sofia and Nikol
Parent Managing Cross-Border Care

A 39-year-old Bulgarian mother of 8-year-old Nikol, who has a rare genetic disorder and requires periodic travel to Germany for specialised care.

Students



Dana
Prospective Student Applicant

A 19-year-old Romanian applying for a bachelor's program in the Netherlands. Depends on recognition of her school-leaving certificate and the ability to authenticate securely for applications



Piotr
Erasmus+ Exchange Student

A 23-year-old Polish student spending a semester in Spain through Erasmus+. Relies on portability of credits and temporary recognition of student status for entitlements



Chiara
Intra-EU Degree Student

A 21-year-old Italian student enrolled in a master's program in Germany. Needs prior qualifications recognised and sustained access to housing, banking, health, and university services

Consumers



Jakob
Cross-Border Goods Shopper

A 36-year-old Austrian who shops for electronics and household goods across EU borders



Carmen
Digital Services Consumer

A 29-year-old Spaniard who books holidays online and uses streaming and fintech apps



Katrin
**Hybrid Consumer
(Goods + Smart Services)**

A 47-year-old German using online grocery services, connected devices, and a smart car

A user journey was then constructed for each of the 14 user personas selected to represent users of the DSM. These journeys elaborate the steps that individual user

personas could take to pursue specific objectives within the DSM, identifying points of interaction and potential obstacles to accomplishing their goals.

User Journey example: Anna (Entrepreneur, Digital Creative Freelancer)

Anna is a 34-year-old UX designer in Portugal working with clients across Germany, France, and the Netherlands. She faces fragmented invoicing, tax, and social protection systems. When engaging with the DSM:

- 1 Anna maintains profiles on several freelance platforms to attract clients across Europe, but each platform requires separate onboarding, verification, and tax registration.
- 2 She must repeatedly submit the same credentials, including proof of residence, VAT ID, and payment information, to each new client or system, and each platform enforces its own invoicing and payment terms.
- 3 Despite her excellent ratings and verified credentials on one platform, she cannot transfer her reputation or references to another, forcing her to rebuild trust with every new client.
- 4 Managing parallel accounts, contracts, and tax documentation across borders and platforms becomes a job in itself, with hours lost to duplicated compliance tasks.
- 5 She begins to feel trapped between platforms, and is aware that her data, ratings, and history are what give her market value, yet none of it is portable or transparent.
- 6 When she tries to compare different platforms or seek better terms, opaque pricing structures and inconsistent visibility into client offers make it nearly impossible to make informed choices.

III. System analysis

The 14 user journeys each identified different types of actors with which users might interact, the types of interactions they might engage with, different points at which their journey might “break” and what they need to efficiently overcome obstacles and achieve their objectives within the DSM. Details on each user journey is presented in the technical annex to this report, which also includes detailed findings and analysis, as presented in below.

Details in the technical annex

- Detailed overview of each of the 14 user journeys
- Findings regarding actors and interactions
- Analysis of structural patterns driving systemic breaks in the DSM

The remainder of this section assesses the break points and user needs surfaced in each user journey and provides a synthetic analysis for how they might be addressed.

Collectively, the user journeys considered here produced a total of 103 specific “breakpoints” at which users were unable to achieve their objectives or otherwise benefit from engagement with the DSM. These were accompanied by 89 specific user needs, highlighting interventions or policy frameworks which would have bridged or avoided those breaks for users.

The distribution of both break points and needs were relatively consistent across the persona types. As shown in the table below, each specific user journey revealed approximately 5 to 9 break points, and a comparable number of needs. Workers stand out for having lowest of each, in both absolute terms and as an average. Per journey, while patients displayed the most break points.

Table 1. Distribution of break points and user needs

User group	# of personas	Total break points	Avg breaks per persona	Total needs	Avg needs per persona
Entrepreneurs	3	21	7.0	22	7.3
Workers	2	10	5.0	8	4
Patients	3	26	8.7	21	7
Students	3	24	8.0	18	6
Consumers	3	22	7.3	20	6.7
Total / Average	14 personas	103 break points	7.4 per persona	89 user needs	6.4 per persona

Across breakpoints, there was a consistent need for users to strengthen visibility, coherence, and agency in their interactions with the digital single market. They wanted to understand who was acting on their data and why; to see that decisions made in one context would carry meaning in another; and to have simple, trustworthy ways to correct, contest, or consent. These needs surfaced not as abstract rights but as everyday frustrations—a missing button, an unexplained rejection, a form that cannot be reused.

For **entrepreneurs**, journeys tend to break where private-sector silos meet national administrative silos. Users expend effort reconciling data that should flow automatically. Administrative fragmentation is the dominant pattern here, as each platform, tax authority, and client uses incompatible procedures. Repetition of onboarding also presents several breaks, as each new platform or contract requires the same KYC, proof of residence, VAT ID, etc. Non-portable credentials, opaque asymmetry in commission rates and platform algorithms, and cross-border incompatibility also present break points.

This highlighted entrepreneurs' needs for more seamless and trustworthy digital working environments where verified information can flow automatically across platforms and borders. Freelancers want interoperable identities that allow cross-platform onboarding and authentication without repeating verification steps. They also need portable, user-controlled reputations and credentials that they can carry between clients and systems, such as proof of skills, tax status, and project history. Transparent dashboards to compare fees, commissions, and platform terms are a recurrent need, alongside EU-wide standards for invoicing, VAT, and reputation portability. Together, these needs describe a desire for a coherent, fair, and interoperable data space for freelance work.

Journeys for **workers** tend to break where opaque algorithmic systems meet fragmented employment classifications. Users face uncertainty about rights and entitlements while relying on data they can neither verify nor reuse. Algorithmic opacity is a defining pattern when workers cannot see or contest how jobs, ratings, or penalties are assigned. Legal ambiguity compounds this, as classification rules differ between Member States, leaving some workers treated as self-employed with no access to benefits. Break points also arise from non-portable work data: ratings, income records, and performance histories remain trapped inside platforms and are not recognised by banks, welfare systems, or tax authorities. The result is administrative invisibility and low trust in both platforms and institutions.

This highlights workers' needs centred on ownership, recognition, and transparency in digital labour. They want worker-owned data wallets that securely store verified records of hours, ratings, and income, so their labour can be recognised beyond a single platform. They need interoperability between platforms, welfare systems, and credit providers so that digital work translates into social protection and financial legitimacy. A clear, harmonised legal framework for employment classification is also critical, alongside enforceable transparency rules for algorithms that shape work opportunities. Collectively, these needs point to a system where data confers rights and algorithmic decisions are accountable.

For **patients**, journeys tend to break down at the boundaries between health systems, vendors, and data infrastructures. Users navigate multiple portals and devices that fail to exchange information, leaving clinicians with partial or outdated records. Non-interoperable health data is the dominant pattern, whereby lab results, prescriptions, and consents are repeatedly re-entered because systems

cannot read each other's formats. Duplicate consents, unclear provenance of uploaded files, and device lock-in amplify frustration and safety risks. Patients are also forced into manual workarounds, printing results or re-explaining medication lists to compensate for missing cross-border and cross-vendor interoperability. These breaks reveal how fragmented governance and vendor ecosystems undermine continuity of care and patient agency.

This highlights patient needs for continuity, control, and safety in managing their health data. They seek patient-controlled health apps that integrate information from devices, specialists, and national records into a single, coherent view. Digital wallets for prescriptions, test results, and entitlements would let them share verified data securely across borders and providers. They also need simple dashboards to manage consent, allowing them to grant or revoke access without re-signing forms at every visit. Underlying these specific needs is a broader one: a trusted, interoperable health ecosystem where patient data follows the individual, not the institution, enabling safer, more coordinated care.

Journeys for **students** tend to break at the junctions between national education systems, identity frameworks, and host-country services. Users encounter inconsistent recognition of credentials, incompatible eIDs, and disjointed application portals. Fragmented recognition processes are the dominant pattern. Diplomas, transcripts, and enrolment certificates require repeated translation and manual verification despite EU-level standards. Each university or authority enforces its own documentation and login systems, leading to redundant submissions and missed deadlines. Credit transfer within Erasmus+ remains slow and uncertain, and entitlements such as housing or health coverage are inconsistently applied across borders. These breaks illustrate how partial implementation of interoperability frameworks leaves students managing digital bureaucracy rather than focusing on mobility and learning.

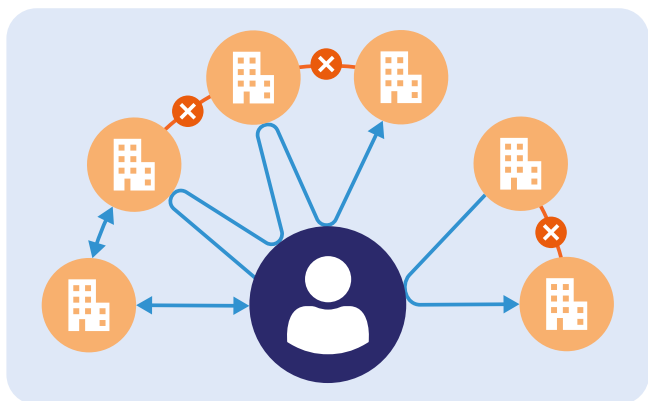
This highlights student needs revolve around recognition, reuse, and transparency in academic and administrative systems. They want digital wallets holding verifiable identity, degree, and language credentials that can be reused across universities and borders. Application assistants that pre-check completeness and recognition requirements would simplify enrolment. Once-Only principles and interoperable admissions infrastructures are essential to reduce duplication across national systems. Mutual recognition frameworks for qualifications and credits are also critical to prevent delays in mobility and graduation. Together, these needs describe a vision of

frictionless educational mobility, where verified academic data is portable and universally trusted.

For **consumers**, journeys tend to break across the seams of fragmented marketplaces, connected devices, and opaque data ecosystems. Users must navigate inconsistent rules and invisible data flows that erode trust. Transparency gaps are the dominant pattern, though dynamic pricing, recommendation systems, and insurance decisions are opaque, with no clear way for consumers to verify or contest outcomes. Cross-border purchases reveal further inconsistency in refunds, warranties, and payment rules, while smart devices and apps introduce unclear responsibility for shared data. Consumers repeatedly re-enter personal details across vendors without understanding how information circulates. These breakpoints expose the absence of user-side visibility and control in increasingly automated consumer environments.

This highlights consumer needs centred on clarity, accountability, and control in increasingly digital and connected markets. They want digital wallets that store receipts, warranties, and service entitlements in a standardised, portable format. Dashboards to view and manage ad profiling and device data flows would provide transparency and autonomy. They also need one-click return and warranty processes and interoperable e-receipts that simplify cross-border transactions. Across these needs runs a consistent demand for visibility and fairness. Consumers need the ability to see what's happening behind the screen and to act on it, restoring agency to the digital consumer.

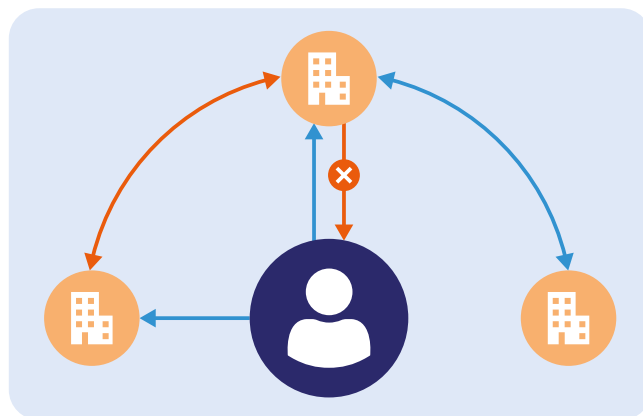
These break points and needs manifest differently for different personas. They include the platform opacity that hides commission rates, fee structures, and access to clients, limiting Anna's ability as a Freelancer to compare offers or negotiate fair terms, as well as the school-exit certificates that are inconsistently trusted by host institutions, frustrating Dana's attempt to apply for a bachelor program in the Netherlands, and many others. They can all, nevertheless, be traced to common structural patterns within the DSM that have to do with institution-centric interoperability, centralised power, and structural incentives towards compliance at the expense of outcomes. These are discussed in some detail in the technical annex, together with an elaboration of common interaction types and other significant actors that appear in the user journeys. Considered together, these analyses suggest that user experiences of the DSM can be best considered through attention to four specific types of systemic breaks, which are described below.



Fragmentation is manifest through consistent characteristics of system breaks when digital interactions are siloed across borders, sectors, and platforms, forcing people to re-enter data, maintain parallel accounts, and bridge gaps that systems were not designed to close.

Every user who crosses a border, changes platforms, or moves between sectors meets the same maze of re-registration, incompatible portals, and redundant data entry. The pattern appears in different guises: a freelance designer forced to maintain parallel tax IDs; a patient juggling multiple e-health logins; a student re-submitting verified transcripts that already exist elsewhere. Despite a decade of “once-only” initiatives, most digital interactions still assume a fixed relationship between citizens and administration. For people whose lives are mobile or hybrid, this assumption collapses. What looks from the institutional side like neatly separated competence domains feels from the individual side like a digital obstacle course.

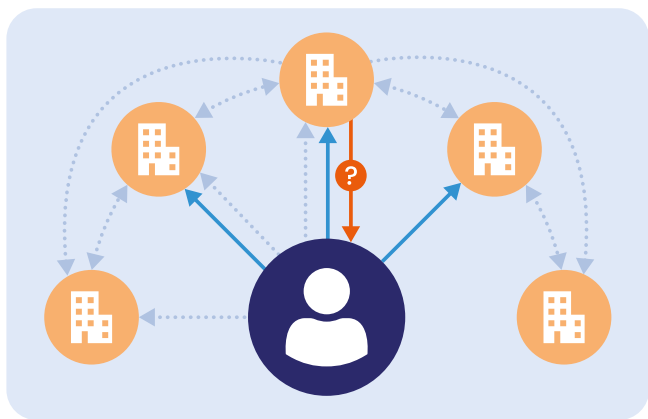
At root, this fragmentation reflects institution-centric interoperability, built on standards that link public databases to each other but rarely place the individual at the centre. Administrative and technical infrastructures evolved along national lines, each optimised for internal efficiency rather than cross-border continuity. The absence of shared user-centric design principles or federated identity systems leaves individuals to bridge the gaps themselves.



Recognition deficits reflect the system’s failure to validate the identities, histories, or contributions of people whose lives fall between institutional categories; credentials and reputations lose value when they cross administrative borders.

A recurring fault line in these journeys is the system’s inability to acknowledge the legitimacy of a person’s status, history, or contribution. The gig worker with years of five-star ratings cannot translate that reputation into evidence of experience; the e-resident’s digital company identity remains mistrusted by banks elsewhere; a chronic-care patient’s treatment plan cannot be recognised because metadata standards diverge. In each case, recognition falters not for lack of information but because the categories of recognition are defined institutionally rather than relationally. Systems are built to recognise institutions, not individuals, to value official credentials, not contextual experience. Those who live between systems fall through the cracks first.

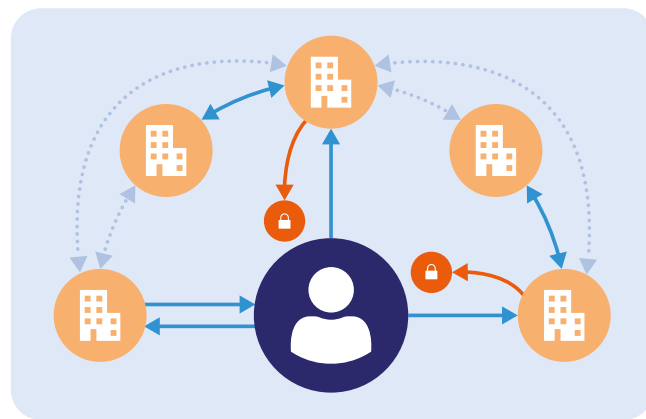
Beneath this lies a structural bias toward institutional legitimacy. Public and private systems rely on closed taxonomies of citizen, employee, student, and patient status, which simplify governance but fail to reflect hybrid realities. Legal and technical infrastructures evolve faster in silos than across them, leaving recognition frameworks fragmented. Until interoperable credentialing and mutual-recognition mechanisms mature, social and professional mobility will remain administratively precarious.



Opacity emerges when decisions are made by unseen systems and outcomes appear without explanations, limiting the ability of individuals to efficiently understand and manage their interactions and compliance replaces comprehension as responsibility diffuses across ministries, platforms, and code.

Several journeys describe users subject to decisions whose origins they cannot trace. A platform worker's income fluctuates according to algorithms no one can explain; a freelancer's e-residency application stalls without feedback; a patient's prescription fails to transfer between systems, and no one can tell her where it stopped. The technology works insofar as data moves and systems update yet meaning is lost. The opacity is procedural as much as technical: interfaces offer compliance disclosures rather than comprehension. The result is a growing distance between action and explanation, where accountability dissolves into layers of code and bureaucracy alike.

This opacity persists because authority and accountability are misaligned. Decision-making power is centralised in ministries, algorithms, and platform management structures, while responsibility for user experience is diffused or outsourced. Regulatory frameworks require documentation but not intelligibility; they measure compliance, not clarity. Without institutional incentives for explainability or user feedback loops, opacity becomes the path of least resistance.



Control limits expose the distance between formal data rights and practical agency. People can access or download their data but rarely use it meaningfully; control remains procedural rather than empowering, and portability a burden instead of a benefit.

Every persona, from patient to student, is nominally granted the right to access and transfer their data, yet few possess the tools or agency to use that right meaningfully. This gap reflects the implementation deficit of the portability right as legally granted but not technically or institutionally realised.⁷ Control is conceptualised as consent, not capability. A health-data download or GDPR access file satisfies a procedural right but does not empower a patient to combine or share information across providers. A freelancer can request her platform data but cannot redeploy it as a verified portfolio. The boundary between "having access" and "having agency" remains wide and unacknowledged.

⁷ Toropainen, 2026

Table 2. Examples of how different user groups experience system breaks

Fragmentation	Recognition	Opacity	Control
<p>Entrepreneurs face repeated verification and compliance steps as digital identities and credentials are not recognised across systems.</p> <p>Workers must re-establish employment, tax, and welfare rights across fragmented platforms and jurisdictions.</p> <p>Patients experience gaps in care when records, prescriptions, and consents cannot move between providers or countries.</p> <p>Students struggle with duplicative applications and delays as qualifications and enrolments are not interoperable.</p> <p>Consumers lose control and visibility when purchases, preferences, and data are trapped in disconnected services.</p>	<p>Entrepreneurs struggle when digital identities and credentials are not recognised across borders or sectors.</p> <p>Workers lose proof of experience and entitlements as their records fail to transfer between employers or systems.</p> <p>Patients face treatment delays when health histories and authorisations are not trusted beyond national systems.</p> <p>Students encounter repeated verification demands because their qualifications lack automatic cross-border recognition.</p> <p>Consumers are denied seamless service when purchases, warranties, or digital profiles are not recognised by other providers.</p>	<p>Entrepreneurs face opaque platform rules and eligibility criteria that block market access without explanation.</p> <p>Workers are managed by algorithms that assign, rate, and penalise them without transparency or recourse.</p> <p>Patients encounter automated health and insurance decisions with little clarity on data use or accountability.</p> <p>Students receive inconsistent admissions and credit outcomes from systems they cannot question or appeal.</p> <p>Consumers are targeted, priced, and profiled by hidden algorithms they cannot see or control.</p>	<p>Entrepreneurs can download business data but cannot reuse it to streamline compliance or access new markets.</p> <p>Workers can view their ratings and earnings but cannot transfer them across platforms or employment systems.</p> <p>Patients can request their health data but lack tools to share or apply it safely across providers.</p> <p>Students can obtain digital copies of records but cannot easily reuse them for enrolment or recognition abroad.</p> <p>Consumers can export their data but cannot meaningfully control how it shapes prices, recommendations, or ads.</p>

Table 2 presents examples of how different user personas might experience different systemic breaks. This is intended to be illustrative, not exhaustive. Indeed, even the limited exercise of elaborating 14 user journeys suggests that experiences of interacting with the DSM can be as manifold as people themselves.

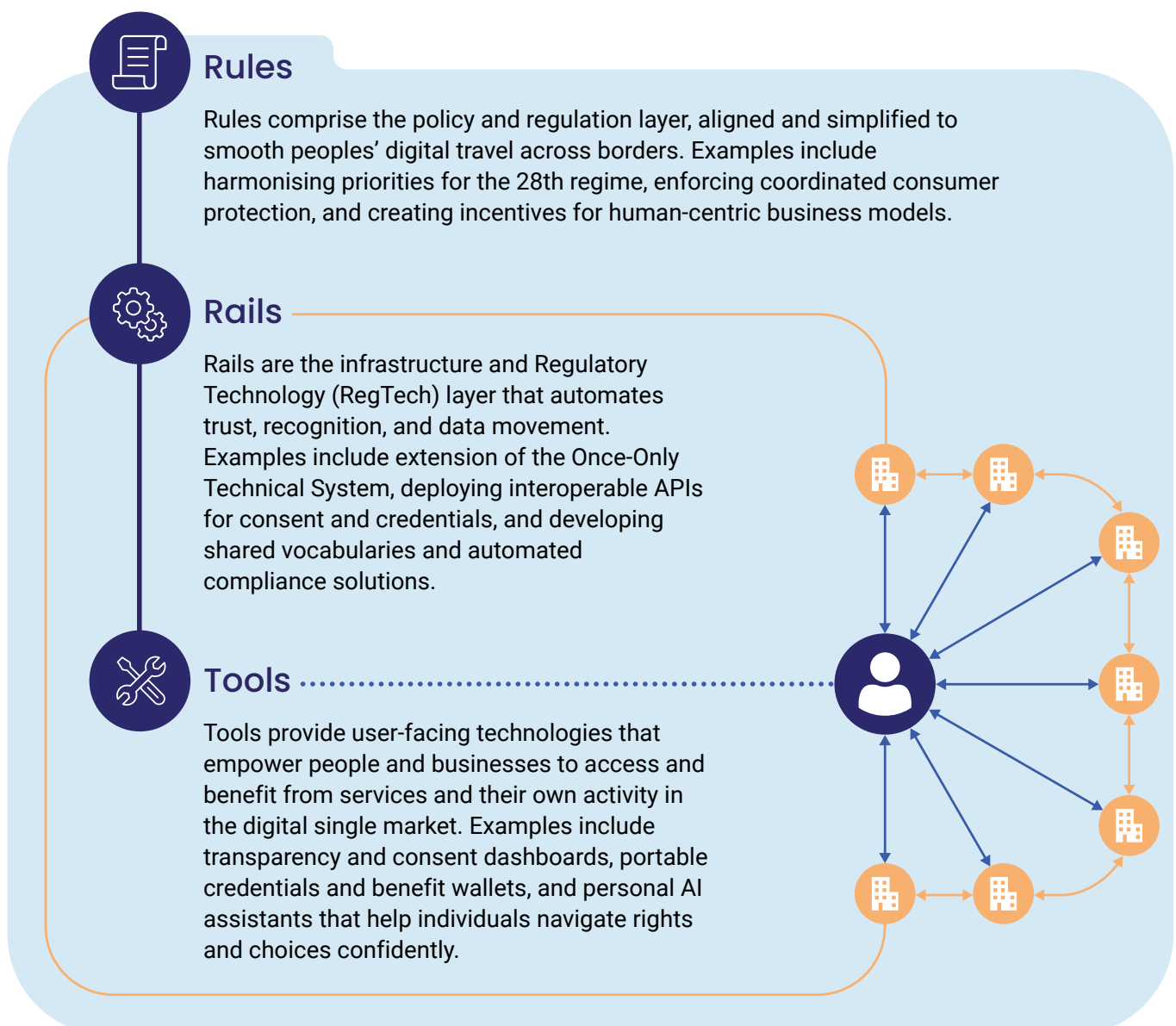
Despite this variation, however, this analysis has identified concrete patterns and commonalities in the challenges that users can face when engaging with the DSM. These patterns can be linked to common structural drivers, actors and interaction types, as are explored in the technical annex. This analysis does however suggest patterns and commonalities that require more than ad hoc and bespoke interventions.

IV. A holistic repair strategy

The DMS remains one of Europe's most ambitious and successful policy frameworks, connecting data, services, and economies across borders. It is not a finished project, however, and this analysis has identified how individuals still encounter breakpoints interacting with the system when systems, rights, value, and recognition fail to align. Importantly, the system analysis of the previous chapter highlighted how these breakpoints are not isolated glitches; they emerge from structural patterns and interactions that recur across the experiences of different types of DSM "users".

Addressing these systemic break points requires more than isolated fixes. It requires a holistic approach to repair strategies that addresses the structural patterns and incentive structures that underly the system breaks identified here. Repair strategies to strengthen and reinforce the value of the Digital Single market for people can thus not rely solely on policy or technology. Instead, they must leverage the ways in which technology and policy interplay to shape the lived experience of Europeans.

Figure 7. Rules, rails and tools: a holistic approach to strengthening the DSM



These components should be seen as mutually reinforcing. Rules set expectations and establish the conditions for trust and fairness. Rails operationalise those rules through interoperable systems, lowering the burdens for different types of actors to use the DSM as it was designed to be used. Tools put people in the driver's seat of their own experiences in the DSM, by providing them with insights and control over their digital interactions.

This is not wishful thinking. Thoughtful and deliberate development of these components in concert can be a game-changer for strengthening the experience and outcomes of individuals in the DSM, helping to achieve the core objectives of ensuring better access to online goods and services for consumers and businesses, fostering the right environment for digital networks to thrive, and promoting digital innovation and skills.

To make this opportunity concrete for policymakers, regulators, public service providers and businesses, this analysis suggests 17 specific interventions that could help to advance a people-first DSM.

Together these interventions constitute a preliminary repair kit to strengthen the architecture of the DSM, to ensure that it is both competitive and inclusive, providing value for businesses, individuals and societies according to core European values.

These interventions are categorised below according to a holistic view of DSM repair strategies, as rules, rails, and tools.

Rules

Significant policy interventions are already underway to address many of the systemic breaks identified in this analysis. The EC's Single Market Strategy, presented to Parliament in May 2025⁸ outlines several important interventions, and additional interventions are expected in the European Data Union Strategy, expected to be presented to Parliament in Q4 2025. Several regulations are also adopted and forthcoming, including the eIDAS 2 Regulation (EU) 2024/1183 on a framework for a European Digital Identity, and the EU Platform Work Directive (2024/2831).

Below are some of the most important policy and governance innovations that need to be safeguarded, strengthened and refined, to improve the experiences of consumers, citizens and entrepreneurs engaging with the DSM.

1 The right to data portability

Article 20 of the General Data Protection Regulation (GDPR) grants individuals the right to obtain and transfer their personal data "in a structured, commonly used and machine-readable format." This right remains under-enforced and inconsistently implemented across Member States. Leaked omnibus drafts at the time of writing suggest an intention to reform GDPR to facilitate AI access to personal data, without addressing operationalisation and enforcement of portability rights. This is, however, particularly important in the context of AI, and should be explicitly reinforced. The Commission should clarify technical standards for portability, including minimum interoperable formats and APIs, and establish obligations for direct, secure transfer between controllers or via trusted intermediaries. Supervisory authorities should be mandated to monitor and benchmark implementation, ensuring that the right to portability becomes a practical instrument for user agency, competition, and innovation rather than a procedural formality.

2 A 28th regime for EU company law

The Single Market Strategy follows recommendations in the Letta report and the Draghi report for a 28th legal regime for company law to streamline and simplify business operations across EU member states, including processes for establishing businesses and measures to reduce the cost of failure. Following the conclusion of the public consultation, and in preparation for the plenary sitting and presentation to the Parliament in Q1 2026,⁹ special care should be taken to anticipate the capacities and demands on entrepreneurs and small businesses to innovate and to ensure that sensitivities in some member states regarding aspects of insolvency, labour and tax law do not obstruct efforts to address entrepreneurs' multi-registration problem and need for harmonized recognition across jurisdictions.

⁸ European Commission. (2025). Single Market Strategy: Securing Europe's competitiveness and prosperity. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM (2025) 130 final, Brussels, 13 March 2025. Available at: <https://single-market-economy.ec.europa.eu/parliament/including/includingeu>.

⁹ European Parliament. (2025). 2025/2079(INL) – The 28th Regime: a new legal framework for innovative companies [Legislative initiative procedure]. Legislative Observatory. [https://oeil.secure.europarl.europa.eu/oeil/en/procedure-file?reference=2025%2F2079\(INL\)](https://oeil.secure.europarl.europa.eu/oeil/en/procedure-file?reference=2025%2F2079(INL)).

3 Harmonisation of service authorisations and certification schemes

The Single Market Strategy anticipates a Q2 2026 launch date for an initiative on harmonisation of authorisation schemes. This initiative should include attention to the harmonisation of authorisations directly related to businesses, entrepreneurs and cross-border workers, including standardisation of digital identity and KYC processes, credential systems for skills, tax status, and professional reputation, interoperability of social benefits, and review of recommendations on business transfers to ease transitions and growth. This initiative should also include harmonisation of certification in other sectors, including education and skills credentials, and the interoperability and alignment of e-prescriptions and patient records in line with European Health Data Space legislation.

4 Coordinated consumer protection and empowerment

In keeping with the above efforts, the Commission should identify specific mechanisms to protect and empower consumers in the digital single market. This will require consistent enforcement of contract and cancellation law and should also explore coordinated oversight to prevent vendor lock-in and strengthen redress mechanisms.

5 Regulatory preference to human-centric businesses

Enhanced mechanisms should be developed to reward companies that prioritise human-centric digital services to European consumers in line with European Data Strategy and European values of human dignity, privacy, and autonomy. This may involve the elaboration of criteria for a specific category of businesses whose contractual and technical character empower users, and preferential procurement, tax, and compliance benefits to reward such businesses in the single market, to indirectly empower and improve the experience of consumers.¹⁰

Together, these interventions will help simplify and harmonise the regulatory landscape for entrepreneurs, reducing the burden of multiple registrations and enabling scale-up across borders. Freelancer and platform workers will benefit from clearer classification, portable entitlements, and trusted digital credentials. Patients

will gain continuity of care through interoperable health records and e-prescriptions. Students will see improved cross-border recognition of learning achievements and professional qualifications. And consumers will enjoy greater transparency, fairness, and trust in digital services, supported by human-centric business models and stronger enforcement of their rights.



Rails

Systemic infrastructure and Regulatory Technology (RegTech) can help to automate compliance for businesses and streamline processes for individuals and SMES, enhancing the safety and efficiency of the digital single market. These interventions reflect and operationalise the principles and intentions of the policies and regulations asserted at the rules level of to build and automate connections and alignments for data, rights, and recognition to move safely and efficiently across sectors and borders.

As with rules, we are not starting from scratch, and there are several initiatives already deployed or proposed to provide systemic or automatic efficiency to the digital single market, including the Once-Only Technical System (OOTS) and infrastructure development for the EUDI Wallets, including large-scale pilots.

Here follow examples of specific initiatives that improve the experiences of consumers, citizens, entrepreneurs and small businesses:

6 Wallet infrastructure for individual capacities and control

The European Digital Identity (EUDI) Wallet's potential extends far beyond identification. Complementary infrastructure should be built to allow the wallet to act as a personal data store supporting the secure receipt, storage, and exchange of credentials issued by both public and private organisations. This requires harmonised technical standards, certified issuer and verifier networks, and procurement incentives for adoption. Delegated acts under the eIDAS 2 Regulation and targeted funding through the Digital Europe Programme can help ensure that the EUDI Wallet evolves beyond a login credential into a cornerstone of people-centric interoperability in the Digital Single Market.

¹⁰ For a detailed recommendation, see MyData Global, 2025 (a), pp. 11-12.

7 Automated alignment through shared data models and AI-powered compliance (EurLexGPT)

Establish a domain-specific AI-model for legislative automation, including data ingestion, generation and retrieval (as pioneered in Sitra's vision for EurLexGPT)¹¹ to support regulatory technology and mutual-recognition frameworks across different verticals.

8 Cross-sector regulatory sandboxes with automated compliance feedback

Create holistic sandboxes that test the interoperability of GDPR, the Data Act, DGA, AI Act, and copyright frameworks in real-world conditions. Sandboxes should include automated compliance reporting and data-driven feedback loops between supervisory authorities, facilitating dynamic regulatory learning and coherent enforcement across regimes.

9 Once-Only Technical System (OOTS) extensions for new domains

Extend the Once-Only Technical System beyond business registration and taxation to include education, health, and consumer data domains, allowing trusted reuse of verified information and reducing redundant submissions for citizens and SMEs.

10 Machine-readable policy and compliance frameworks

Deploy machine-readable policy models to standardise how consent, accountability, and data-sharing obligations are expressed and verified across systems. This would enable automated checks and reduce legal ambiguity, supporting RegTech innovation and proactive supervision by regulators.

11 Interoperable APIs for consent, credentials, and service switching

Develop uniformly adopted API and interoperability standards for personal data intermediaries, consent management, and service switching, enabling individuals and organisations to reuse, port, and control their data across platforms and sectors in line with the Data Act and Data Governance Act.

Together, these initiatives would strengthen Europe's capacity for embedded trust — ensuring that rules protecting rights and fairness are consistently enacted in the infrastructures that citizens, entrepreneurs, and small businesses depend on. They would reduce administrative friction for entrepreneurs and SMEs, who will gain from automated compliance, interoperable identity and reporting tools, and simplified access to new markets. Workers would benefit from portable, verifiable credentials and fairer digital labour systems that recognise their rights and experience across platforms and borders. Patients would experience greater continuity of care through interoperable e-prescriptions, digital IDs, and secure reuse of verified health data. Students would see faster and more reliable cross-border recognition of learning and qualifications. And consumers would enjoy more transparent, trustworthy, and user-controlled digital services, grounded in European values of privacy, dignity, and fairness.

Tools

If rules define the framework and rails provide the infrastructure, tools are where people meet the system. User-facing applications, interfaces, and services translate complex policy and technical architecture into something that consumers, citizens, entrepreneurs, and small businesses can actually use. These tools turn conceptual rights into reality by providing individuals the ability to understand, decide, contest, and benefit from their interactions with the digital single market. Below are examples of such initiatives that operationalise the principles and intentions of policy and infrastructure, while also strengthening the position and experience of individual users.

12 Sovereign data stores and sharing tools

Individual data stores or data pods that provide individuals with direct control over specific data are critical complements to institutional infrastructures for data sharing. Such tools operate as secure, user-controlled environments that make data rights tangible in practice. They allow individuals to combine and reuse information from different sources share verified credentials across services, and to participate in data ecosystems on equal

¹¹ See Lindholm & Olsen 2025 for foundational components of EurLexGPT. For Sitra's work on LexGPT in Finland, see <https://www.sitra.fi/en/articles/pilot-project-opportunities-for-legislative-drafting-to-use-generative-ai/>.

terms with organisations. By embedding portability, interoperability, and auditability by design, they enable trust, reduce administrative friction, and create new pathways for innovation in both public services and the private sector. There are multiple pilots, proofs of concept, and live implementations of such tools,¹² but awareness and adoption remain limited.

13 Consumer transparency and consent dashboards

Building on the transparency and fairness requirements of the Digital Services Act, AI Act, and Data Act, consumer dashboards or similar tools should present clear, real-time information about product origin, warranties, sustainability claims, and data use. These tools would consolidate verified information from suppliers, platforms, and data intermediaries, helping consumers to understand how prices are set, how personalisation works, and how to withdraw consent or contest automated decisions.

14 Integrated data access mechanisms for patient, worker, and student data

Access to own data is akin to a fundamental right in the digital age. Using the data portability and interoperability features established through EHDS, ESSPASS, and the Learning Data Space, personal benefit dashboards, portals or similar tools integrated into existing digital services, that would allow users to view and manage their verified entitlements, from health coverage and social benefits to training credits and professional licenses. These interfaces could connect directly and interoperate with eIDAS digital wallets, allowing secure sharing with employers, educators, or service providers.

15 Personal AI assistants for trusted interactions

In line with the EU's vision of human-centric AI, lightweight AI assistants could help citizens and SMEs navigate contracts, privacy notices, and regulatory obligations. Integrated into digital wallets or personal data stores, these assistants could interpret complex legal terms, automate form submissions, flag potentially unfair conditions, or even simulate the effect of granting or withdrawing consent — empowering users to act confidently in digital markets.

16 Portability tools for reputation, experience, and credentials

Complementing initiatives on skills and professional recognition under the Single Market Strategy and the Skills Data Space, these tools would let users securely transfer verified work histories, ratings, and qualifications between platforms and across borders. For freelancers, small firms, and students alike, this would reduce duplication and enable trusted recognition of learning and experience throughout Europe.

17 Embedded digital literacy and rights-awareness modules

Public services, educational platforms, and consumer portals should embed modular learning tools that explain rights and obligations as users act — not after the fact. Drawing on EU programmes such as Better Internet for Kids and Digital Europe's Skills Agenda, these modules would make literacy and rights-awareness a living part of digital participation, not a separate policy goal.

Together, these tools represent the human interface of the DSM — the layer that translates Europe's data, AI, and consumer regulations into visible, usable benefits. They will help entrepreneurs demonstrate compliance and transparency to customers and regulators; workers to manage portable credentials and entitlements; patients to access and share their medical data securely; students to gain recognition for learning achievements across borders; and consumers to understand and control the digital services they use every day.

¹² See awardees of the MyData Awards for technology, at <https://mydata.org/mydata-award-winners-2024-2025/>.

V. Recommendations for key stakeholders

Leveraging the three levels of repair interventions described above requires action from a diverse group of stakeholders, with varying incentives, capacities, and opportunities to advance a people-first DSM. **Individual people** are the most important actors for this analysis, and while they have an important role to play in making their needs and demands clear to policymakers and service providers through advocacy and democratic engagement, their power to directly affect meaningful change in how the DSM functions is limited. Meaningful improvements most immediately require coordinated action from other actors with more direct control over how the DSM works.

This chapter provides specific recommendations for each of the four stakeholders groups identified in system analysis as defining the design and structure of the DSM. Across Europe, efforts are already being made to translate the principles described by this analysis into reality, by highlighting and building on these, the recommendations below highlight how key stakeholders can help to connect these efforts into a systemic and holistic pursuit of a people-first DSM.

Policymakers

The recognised ability of citizens and SMEs to effectively exercise rights and access services is the cornerstone of Europe's digital single market. Policy coherence, interoperability, and regulatory predictability are often treated as end goals, but are really only instruments to enable the delivery of seamless and effective services towards European citizens, consumers, and entrepreneurs.

Acknowledging the central importance of user experiences with the single market can help policymakers understand and leverage the relationships between human-centric policy, infrastructure, and technological tools. This is critical to ensure that the elaboration and

reform of the regulatory frameworks underpinning the digital single market create drive European competitiveness based on European values.

To do so, policymakers should

- 1 Adopt an **integrated DSM repair agenda** explicitly oriented towards the individual user experiences. This agenda should be defined and coordinated horizontally between relevant DGs and vertically with Member States to elaborate and repair system breaks such as those defined in this analysis. This effort could extend the approach of the EC's Single Market Strategy, building on recommendations to address the "terrible ten" problems 1, 3, 4, 5, and 9.¹³
- 2 **Invest in infrastructures and user tools** that are described as rails and tools as presented in Chapter IV. This can be executed through a variety of initiatives such as EDICs, the Commission's own resource allocation, established funding windows such as the Digital Europe Programme, and indirectly through institutional channels such as the EDIH framework. Some Member States have already taken steps in this direction. Initiatives such as Finland's MyData ecosystem,¹⁴ Estonia's cross-border X-Road,¹⁵ and France's *Mon Espace Santé*¹⁶ illustrate how coordinated investment in people-centric infrastructures can operationalise the DSM's principles of interoperability and trust.
- 3 Raise **public awareness of digital wallets, credential agents, and personal data stores** that enable individuals to manage and share their data under their own control. Public communication, funding, and procurement programmes should highlight and privilege such tools as practical enablers of portability, innovation, and trust.

¹³ European Commission, 2025, pp 4-15.

¹⁴ See <https://valtioneuvosto.fi/en/-/1410829/ministry-of-transport-and-communications-joins-data-spaces-alliance-finland>

¹⁵ See <https://e-estonia.com/solutions/interoperability-services/x-road/>.

¹⁶ See <https://www.monespacesante.fr/>.

Regulators

A people-first DSM improves and facilitates regulation by aligning the rules, infrastructures, and user experiences that underpin compliance. Regulators are not only guardians of trust but also beneficiaries of a more coherent DSM, where interoperable systems and consistent rights make oversight more efficient and predictable. In an era of overlapping and complex regulations, fragmentation increases enforcement costs. People-centred repair interventions reduce this burden by clarifying how regulations connect in practice, strengthening both regulatory certainty and public confidence. By embracing data-driven collaboration and regulatory technologies, authorities can move from reactive enforcement to proactive stewardship, improving the legitimacy, agility, and overall effectiveness of regulations.

To do so, regulators should

- 4 Invest in the adoption of **RegTech solutions** at the supra-national and the national level, including the rails identified in this analysis, to automate compliance checks, certification, and redress processes, reducing friction for both users and SMEs.
- 5 Facilitate **adaptive governance** by using user feedback and system-level monitoring (e.g., digital stress tests) to identify emerging breakpoints before they scale. Complement this with specific initiatives for transparency of algorithmic and data-based decisions in platforms and public services through auditable processes and open interface requirements. Several Member States are already testing adaptive and data-driven regulatory approaches. Spain's AI sandbox,¹⁷ France's CNIL work towards algorithmic-audit pilots,¹⁸ and Denmark's RegTech experiments¹⁹ offer promising models for proactive, people-centred oversight.
- 6 Build cross-domain **regulatory cooperation** mechanisms to ensure operational interoperability and harmonisation, and to identify systemic breaks that manifest across jurisdictions.

Public service providers

Designing systems around human needs, transparency, and accountability can strengthen the quality of digital services and infrastructure provided by public agencies and public interest organisations. This is doubly beneficial for public agencies, who are increasingly assessed against digitalisation criteria. Just as importantly, addressing systemic breaks for individual users of the DSM can strengthen the digital agency and capacity of citizens more generally. When this facilitates uptake and onboarding to digital services it also reduces costs for service providers. Public agencies and public interest bodies should work towards reinforcing individual benefits to secure these efficiency gains while also demonstrating the democratic value of digitalisation.

To do so, public service providers should

- 7 Invest in **interoperable standards and practices and infrastructures**, including the "rails" identified in this analysis, to reduce duplication and enable seamless exchange between administrations and markets. Ensure that mechanisms for user informed sharing can directly port data to trusted third parties, to support innovation and the development of national business ecosystems through the production of complementary and add-on data services.
- 8 Adopt **human-centric service design** practices that integrate accessibility, usability, and data-empowerment principles from the outset, ensuring that services are genuinely inclusive and capacity-developing for users.
- 9 Act as **lead adopters and demonstrators** of trustworthy data-governance models—testing participatory approaches to consent, data altruism, and algorithmic transparency that can later inform private-sector and cross-border use. Projects such as Austria's Digitales Amt²⁰ and Finland's AuroraAI²¹ already illustrate how embedding usability, consent, and trust by design can increase uptake and reduce administrative friction.

¹⁷ See <https://espanadigital.gob.es/en/measure/ai-regulatory-and-ethical-framework>.

¹⁸ See, for example, <https://www.cnil.fr/en/paname-partnership-privacy-auditing-ai-models>.

¹⁹ See, for example, <https://www.denmarktenders.com/tender/tender-supervisory-technology-system-suptech-data-collection-danish-financial-supervisory-authorit-5dd8304.php>.

²⁰ See <https://www.bmeia.gv.at/en/consular-section-of-the-austrian-embassy-in-washington/service-for-citizens/meeting-point-austrians-abroad/mobile-phone-signature-id-austria>.

²¹ See <https://oecd-opsi.org/innovations/auroraai/>.

Businesses

Businesses operate at the interface of the DSM's promises and its practical gaps and are often the first point of interface with individual service users, most exposed to the impact of positive or negative user experiences. In this context, business models based on data accumulation are less sustainable, and competitive advantage increasingly depends on trustworthiness, interoperability, and user control. Businesses small and large are uniquely positioned not only to benefit from a people-first digital market, but to contribute fostering demand and supply for making that market a reality but developing and piloting services and solutions that put people first.

To do so, businesses should

- 10** Design for **portability and interoperability** from the outset — treat data mobility and user control as value propositions, not compliance obligations. Capitalize on privacy scandals and waning trust in large platforms to promote services that give people digital control that translates into real everyday value. Examples such as the Nordic BankID ecosystem²² and Finland's MyData Share initiative by Vastuu Group²³ show how trusted, user-controlled identity and consent infrastructures can succeed commercially while strengthening compliance and user confidence. Similarly, Catena-X in Germany²⁴ demonstrates that federated data-sharing among competing firms can enhance both efficiency and sovereignty.
- 11** Collaborate with other businesses to identify **business and innovation opportunities** based on specific use cases for consumer-driven data sharing. This may include traditional API and protocol driven data sharing, or the use of agentic AI and other tools that manifest an explicit fiduciary duty to users over the other services and actors they engage with. Industry alliances like the Gaia-X hubs²⁵ and IDSA communities²⁶, and sectoral pilots such as Catena-X and the Mobility Data Space²⁷, suggest opportunities for firms to co-create interoperable frameworks that make user-centric data exchange a competitive advantage rather than a burden.
- 12** Integrate **user feedback and transparency** features into product design, ensuring that empowerment and usability reinforce customer retention and brand trust. Share information on user feedback at the industry level and in collaborative contexts with regulators and policymakers, to help identify and pre-empt systemic breaks in the digital single market. Retail and service innovators like Carrefour's Eco-Score transparency labelling²⁸ and S-Group's cooperative retail network and loyalty apps²⁹ illustrate how voluntary transparency and explainability in both digital and analogue formats can strengthen loyalty and pre-empt regulatory risk.

²² See <https://www.digdir.no/media/1063/download>.

²³ See <https://www.mydatashare.com/>.

²⁴ See <https://catena-x.net/>.

²⁵ See <https://gaia-x.eu/community/hubs/>.

²⁶ See <https://internationaldataspaces.org/make/communities/>.

²⁷ See <https://mobility-dataspace.eu/> and <https://dssc.eu/space/BVE2/1071252241/Cross-data+space+interoperability+considerations+in+data+space+design+and+operation>.

²⁸ See <https://www.carrefour.com/en/news/carrefourecoscore> and Salsify (2021).

²⁹ See <https://www.s-kanava.fi/en/>, and Einiö (2018).

VI. Conclusions

Europe's Single Market remains the European Union's greatest geopolitical asset. It is the foundation of its prosperity, cohesion, and international influence. As the market evolves to encompass data, algorithms, and digital services, its continued strength depends on its ability to serve people as directly and effectively as it serves institutions. Completing the Single Market for the digital age is therefore not only a question of competitiveness, but also of legitimacy: a digital Europe that works for people will be one that works for business and democracy alike.

The People-First Playbook has illustrated how individuals' daily interactions with Europe's digital systems reveal both the achievements and the unfinished work of integration. Ninety-four specific breakpoints across user journeys show that Europe's challenge is not a lack of innovation or ambition, but a lack of coherence. We see a gap between the rights that are guaranteed on paper, and the realities people face online. Repairing these breaks requires more than additional regulation; it calls for a new

balance between institutional certainty and individual agency, between protection and participation.

A people-first approach recasts the very notion of competitiveness. When citizens, consumers, and entrepreneurs can move their data, credentials, and rights across borders with clarity and confidence, they create demand for trustworthy and interoperable services. This creates a competitive advantage for the best of European innovators and marketeers, building a more dynamic and sustainable digital economy. Investment in people-centred digital infrastructure is thus an investment in Europe's own market efficiency and resilience.

The next phase of the European Single Market reform must translate these insights into measurable progress. The breakpoints identified in this analysis can serve as indicators of success: as they diminish, Europe's market coherence grows. Each repaired fracture provides individual citizens, consumers or entrepreneurs with a chance to act, decide, and connect without friction. This strengthens the integrity of the European market as a whole.

Annexes

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Technical Annex

Overview of user journeys

Entrepreneurs

Anna: Digital Creative Freelancer

Profile & context

34-year-old UX designer in Portugal working with clients across Germany, France, and the Netherlands. She faces fragmented invoicing, tax, and social protection systems.

Journey narrative

- 1 Anna maintains profiles on several freelance platforms to attract clients across Europe, but each platform requires separate onboarding, verification, and tax registration.
- 2 She must repeatedly submit the same credentials, including proof of residence, VAT ID, and payment information, to each new client or system, and each platform enforces its own invoicing and payment terms.
- 3 Despite her excellent ratings and verified credentials on one platform, she cannot transfer her reputation or references to another, forcing her to rebuild trust with every new client.
- 4 Managing parallel accounts, contracts, and tax documentation across borders and platforms becomes a job in itself, with hours lost to duplicated compliance tasks.
- 5 She begins to feel trapped between platforms, and is aware that her data, ratings, and history are what give her market value, yet none of it is portable or transparent.
- 6 When she tries to compare different platforms or seek better terms, opaque pricing structures and inconsistent visibility into client offers make it nearly impossible to make informed choices.

Interactions & actors

- Platform intermediaries (Upwork, Malt, Fiverr); tax authorities (Portugal, France, Germany); clients across Member States; payment processors; business insurers.
- Secondary actors: accountant; digital identity provider; platform regulator; competition authority.

Break points

- Lack of standardisation and interoperability across freelance platforms, each with its own onboarding, KYC, and compliance processes.
- Platform opacity hides commission rates, fee structures, and access to clients, limiting her ability to compare offers or negotiate fair terms.
- Multi-homing multiplies the administrative burden and fragments the reputation and compliance data.
- No portable, verifiable credentials for skills, tax status, or reputation.
- Clients cannot easily verify her legitimacy across platforms, while Anna cannot verify platform reliability or client solvency.
- Repeated requests to share sensitive data erode trust and raise privacy concerns.
- Lack of reusable identity, portfolio, and payment data across systems.
- Fragmented record-keeping leaves her without continuity or proof of work history, undermining access to credit, benefits, or cross-border recognition.
- No ability to manage or withdraw consent across multiple intermediaries.

User needs

- Interoperable digital freelancer identity enabling seamless cross-platform verification.
- Portable, user-controlled reputation and credential systems (e.g., verified skills, project history, and tax status).
- Transparent dashboards and comparison tools allowing freelancers to assess platform terms, fees, and client opportunities.
- EU-wide framework for cross-platform interoperability and fair competition standards in digital labour and service marketplaces.
- Data intermediaries and consent management systems enabling secure reuse of verified credentials and transaction data.
- Common standards for digital invoicing, VAT, and reputation portability across Member States.

Lukas: Seasonal Construction Freelancer

Profile & context

46-year-old Polish builder taking seasonal contracts in Austria and Germany. Relies on labour mobility but struggles with welfare and health entitlements across borders.

Journey narrative

- 1 Lukas packs his bags each summer to work construction in Austria, usually for a few months. His contracts fall under posted worker rules, but every year he faces a mountain of paperwork.
- 2 He pays into Polish social security, but Austrian employers also make contributions, and reconciling the two is confusing. (3) After an accident, he learns how fragmented health coverage is: the EHIC should work, but the hospital insists on verification from Poland. Weeks pass before his case is processed.
- 3 Tax season brings risks of double taxation between Poland and Austria.
- 4 Returning home, he finds entitlements delayed or inconsistently recorded. He worries his seasonal work may not build toward long-term security.

Interactions & actors

Employers, host country authorities, Polish social security, EHIC/S1, and tax agencies.

Break points

- Posted worker procedures poorly digitised; health and welfare systems opaque; tax coordination confusing.
- Employers and hospitals hesitate to accept posted worker or EHIC documentation.
- Recognition is slow and paper-heavy.
- Social contributions and entitlements are not portable; limited direct access to his own records abroad.

User needs

- Worker wallet with live-posted worker status and entitlements.
- Cross-border tax estimator.
- Claim companion app.
- Multilingual procedure helpers.
- Fully digitise the posted-worker registry.
- Real-time entitlement checks across states.
- Prevent double taxation via data exchange.
- RegTech for auto-filing and hospital verification.

Jonas: IT Consultant & e-Resident

Profile & context

39-year-old Estonian cybersecurity consultant running a one-person company via e-Residency. Highly digitalised but still meets patchy recognition across the EU.

Journey narrative

- 1 Jonas registers his cybersecurity company with a few clicks through Estonia's e-Residency programme and receives a digital ID.
- 2 He signs a contract with a French firm using a digital signature, fast and binding.
- 3 VAT OSS works seamlessly through Estonian systems.
- 4 But in Italy, a procurement system refuses e-Residency companies, forcing him to partner locally.
- 5 When seeking insurance, he finds no EU-wide product; pensions are siloed by country. Jonas realises DSM tools give him reach and speed, but not universal recognition.

Interactions & actors

Estonian e-Residency system, EU clients, VAT OSS, procurement systems, insurers, pension providers.

Break points

- DSM tools are unevenly recognised; procurement and banking rules vary; lack of transparency on eligibility.
- Some procurement systems and banks distrust e-Residency companies, limiting their opportunities.
- Company data is reusable via e-Residency, but pensions and insurance remain nationally siloed.

User needs

- Expanded e-Residency dashboard with insurance/pensions.
- Tender-readiness checker.
- One-click KYC.
- Contracting hub for e-signatures.
- Mandate EU-wide recognition of e-Residency.
- Regulatory passport for insurance/pensions.
- Banking guidance on e-ID/e-signatures.
- Interoperable procurement portals under eIDAS/ESPD.

Marta: Food Delivery Rider

Profile & context

28-year-old Spanish national working full-time in Berlin for a delivery platform. Relies entirely on the platform for income, but has limited social protections and recognition of her work.

Journey narrative

- 1 Logs into the app daily, where algorithmic scheduling dictates work and penalises rejected jobs.
- 2 Dependent on opaque ratings she cannot contest, creating insecurity.
- 3 Struggles to prove income when applying for housing or credit.
- 4 After a cycling accident, she finds she has no sick pay or insurance due to “self-employed” status.
- 5 Generates extensive data about her labour but cannot repurpose it to support her rights or wellbeing.

Interactions & actors

Delivery platforms (Glovo, Deliveroo, Uber Eats); customers; municipal regulators; banks and landlords; national insurance/social security offices.

Break points

- Divergent classification of platform workers across Member States
- Opaque platform algorithms for job allocation and ratings
- Income and ratings are not recognised as legitimate proof by financial institutions or welfare systems.
- Distrust in algorithmic fairness.
- No way to port earnings, ratings, or employment data into financial or social systems.

User needs

- Worker-owned data wallets to export verified records of hours, ratings, and income.
- Interoperable credentials linking gig work to welfare and credit systems.
- EU-wide framework harmonising employment classification.
- Enforceable rules for algorithmic transparency and audits.

Arun: Online Microworker

Profile & context

34-year-old Indian doctoral student in Belgium supplementing his stipend via microwork platforms. His work is entirely digital and cross-border, yet invisible to local institutions.

Journey narrative

- 1 Completes thousands of small digital tasks for international clients via platforms.
- 2 Payments are delayed, deducted by intermediaries, and unclear for tax obligations in Belgium.
- 3 Work history remains trapped in the platform, unrecognised in the formal labour market.
- 4 Disputes over rejected tasks are arbitrated unilaterally by the platform.
- 5 Contributions feed global AI, yet his own labour remains invisible, without recognition or transferable records.

Interactions & actors

Microwork platforms (MTurk, Clickworker, Appen); international clients; global payment intermediaries; Belgian tax authority; university administration.

Break points

- Fragmented rules for cross-border payments and taxation.
- Opacity in dispute resolution and task evaluation by platforms.
- Microwork history not recognised as employment.
- Lack of trust in platform arbitration and client fairness.
- Task history and reputation are siloed inside platforms, not portable to other platforms or formal labour markets.

User needs

- Digital ID-linked work passports to transfer task histories into recognised credentials.
- Tools for simplified tax filing using platform data.
- EU standards for cross-border digital labour payments and taxation.
- Interoperability rules to require portability of platform reputations and work records.

Elena: Resident Chronic Patient

Profile & context

52-year-old teacher in Italy with diabetes, receiving ongoing care in her home country. Relies on national systems but has occasional touchpoints with cross-border suppliers, apps, and specialist consultations.

Journey narrative

- 1 Manages condition and treatment with her GP and local pharmacy, but specialist reports and lab results from different providers are not consolidated, so clinicians see partial histories..
- 2 Encounters delays and ambiguity when medicines or devices must be sourced from abroad, eg when a prescribed device, such as a sensor or pump, is out of stock locally, and there is a brand or code mismatch with the equivalent from another EU country.
- 3 Uses telehealth tools developed in other EU countries that don't integrate smoothly. Data does not flow back into her national record, forcing clinicians to re-interpret PDFs with uncertain provenance.
- 4 Data rights to access her own health data [1] under EU law exist but are not visible in practice.
- 5 At a routine hospital visit, she is asked to re-consent for data access because the hospital's system cannot read her prior consents; duplicate tests are ordered, adding cost and delay.
- 6 An unexpected emergency admission exposes life-critical gaps: medication lists, allergy flags, and the latest HbA1c are missing at the point of care, increasing the risk of error.

Interactions & actors

Local doctors, health professionals, pharmacists, national health insurers, EU-wide suppliers of medicines and devices, and telehealth app providers, device vendors and distributors (including cross-border supply).

Break points

- Uneven adoption of e-prescriptions and digital health tools across Member States
- Unclear visibility of EU-level rights.
- Device/medicine coding differences across suppliers complicate substitutions and refills.
- Emergency care lacks timely access to verified medication/allergy summaries.

- Patient has legal rights under GDPR/EHDS, which would help her to track her own disease progress and make lifestyle choices accordingly, but cannot exercise them effectively.
- Clinicians do not trust PDFs or patient-uploaded files without verifiable provenance.
- Elena cannot assemble a single, portable longitudinal record for her own use or to share.
- Vendor lock-in restricts export from home monitoring devices and apps.

User needs

- Patient-controlled health apps that integrate device data with national records.
- Digital wallets for prescriptions and entitlements.
- Single consent & access dashboard to grant/withdraw permissions across providers and apps.
- Stronger enforcement of EU-level interoperability standards for e-prescriptions across national health systems, and for connected medical devices and applications that integrate with them.
- Stronger enforcement of GDPR and EHDS rights at the national level.
- Cross-recognition of medicine codes and harmonisation of device identifiers to ensure safe substitutions and refills across Member States.
- Procurement/certification that prevents vendor lock-in (open interfaces, export by default).

Johan: Mobile Worker with Chronic Condition

Profile & context

44-year-old Dutch engineer living in Belgium with an autoimmune condition requiring regular treatment in both countries.

Journey narrative

- 1 Receives treatment in Belgium while maintaining ties to Dutch healthcare, including treatment plan and lab results are maintained in the Dutch eHealth system..
- 2 Faces non-interoperable health records across systems. His Belgian GP cannot access this information, forcing Johan to print summaries and hand-carry them to appointments.
- 3 Prescriptions are not seamlessly recognised between Member States. To refill prescriptions in Belgium, he must request reauthorization because medication codes and authorisations differ, creating delays and treatment anxiety.
- 4 Insurance reimbursement is delayed and requires paperwork, sometimes also requiring him to pay out-of-pocket for treatment.

- 5 In an unexpected flare-up, he visits an emergency clinic where staff cannot view his current immunosuppressive medication, increasing the risk of dangerous drug interactions.
- 6 Over time, two partial health records evolve, each missing information from the other, leaving clinicians uncertain which to rely on.

Interactions & actors

Belgian and Dutch doctors[4], hospitals, insurers, pharmacies, and cross-border regulators and reimbursement authorities.

Break points

- Health record systems are not interoperable, so test results and treatment plans must be re-entered manually.
- Prescriptions are inconsistently recognised[6], eg medication identifiers differ across systems, creating mismatched authorisations and unsafe substitutions.
- Insurance systems cannot verify foreign prescriptions, delaying reimbursement.
- Lack of trust in reimbursement systems.
- Patients cannot rely on continuity of their treatments across borders.
- Clinicians are unsure which record or prescription version is authoritative.
- Johan has no single longitudinal record spanning both health systems.
- He cannot see where or when his data is used, nor manage consent centrally.
- Delays in insurance reimbursements.

User needs

- Cross-border patient record apps enabling individuals to share data directly with providers.
- Portable e-prescriptions valid across Member States.
- An import/export bridge that reconciles different coding systems for medicines and test results.
- Alerts and verification indicators to help clinicians trust foreign documents.
- Harmonised EU infrastructure for cross-border exchange of data between national systems for prescriptions and reimbursements (e.g. DiGA, PECAN, LATM, mHealth).
- Automatic recognition of prescriptions and entitlements.
- Recognition of equivalent medicines and coding systems under the European Health Data Space.
- Procurement policies preventing vendor lock-in, enabling open export formats.

Sofia and Nikol: Parent Managing Cross-Border Care

Profile & context

39-year-old Bulgarian mother of 8-year-old Nikol, who has a rare genetic disorder and requires periodic travel to Germany for specialised care.

Journey narrative

- 1 Travels with Nikol to Germany several times a year for specialised treatment. The German hospital runs new tests and updates the treatment plan, but these data do not integrate automatically with Bulgarian records.
- 2 (2)The German hospital runs new tests and updates the treatment plan, but these data do not integrate automatically with Bulgarian records..
- 3 (3) Prescriptions from Germany are not always recognised[2] at home, because of differing medicine approvals and coding, so German prescriptions must sometimes be reissued locally.
- 4 School-based support and welfare entitlements don't carry across borders, and Bulgarian authorities require notarised translations and cannot verify German invoices digitally, forcing Sofia to pay out of pocket and wait months for refunds.
- 5 Caregiving burden magnified by administrative fragmentation and lack of portability, and Sofia must re-sign paper consent forms because parental proxy rights and digital signatures are not mutually recognised.

Interactions & actors

Hospitals and specialists in Germany, the Bulgarian healthcare system, schools, insurers, welfare offices, insurers, device vendors, and rare disease networks.

Break points

- Fragmented and untranslated medical records, forcing manual document exchange.
- Inconsistent lab codes and terminology lead to retesting and waste.
- Inconsistent recognition of entitlements across borders and sectors.
- Families must repeatedly prove eligibility and medical needs...
- Lack of trust in institutions to coordinate cross-border exacerbated by lack of provenance or accreditation for foreign results.
- Parents and clinicians uncertain which record version is complete or current.
- Entitlements for health, education, and welfare are not portable.

- Caregivers lack tools to transfer records and support seamlessly.
- Identifiers and national patient numbers cannot be linked cross-border.

User needs

- Caregiver dashboards that consolidate a child's health, school, and welfare records, including verified treatment summaries, medication lists, and allergies.
- Multilingual record translation tools for automated translation and provenance verification of foreign labs and reports.
- Unified consent interface recognising parental digital signatures.
- EU frameworks for rare disease care coordination
- Integrated cross-sector systems linking health, education, insurance, and welfare entitlements across borders.
- Open-data export and procurement rules preventing vendor lock-in.

Students

Dana: Prospective Student Applicant

Profile & context

19-year-old Romanian applying for a bachelor's program in the Netherlands. Depends on recognition of her school-leaving certificate and the ability to authenticate securely for applications

Journey narrative

- 1 Applies to Dutch universities but her Romanian certificate is not automatically recognised, requiring translation and lengthy verification
- 2 Cannot use her national eID on Dutch enrolment portals, forcing manual submission paths
- 3 Submits application fees and documents across multiple fragmented systems
- 4 Faces unclear timelines and status updates across systems, creating uncertainty about enrolment
- 5 Risks losing her place due to delays driven by cross-border fragmentation rather than merit

Interactions & actors

National admissions bodies, universities, ENIC/NARIC recognition centres, eIDAS infrastructure, digital application portals, scholarship agencies

Break points

- Application systems are nationally siloed with little cross-border interoperability.

- Recognition criteria and workflows are opaque and inconsistent.
- Admission timelines and status updates are unclear across systems.
- "School-leaving certificates are inconsistently trusted by host institutions.
- Foreign-issued eIDs and documents are not accepted by portals and service providers.
- Applicants cannot reuse verified credentials across multiple applications
- No portable verifiable profile for identity, qualifications, and language certificates.
- There are no agreed data models for the different types of evidences, f i what fields must be present in a diploma.

User needs

- Applicant wallet holding verifiable credentials for identity, qualifications, and language tests.
- Guided application assistant that pre-checks completeness and recognition requirements.
- Single dashboard to reuse documents across universities.
- Mutual recognition frameworks for secondary qualifications as specified in ECTS Users guide and European Digital Credentials.
- eIDAS 2.0 adoption by admissions portals and national agencies .
- Interoperable admissions infrastructure and Once-Only Technical System support for education.

Piotr: Erasmus+ Exchange Student

Profile & context

23-year-old Polish student spending a semester in Spain through Erasmus+. Relies on portability of credits and temporary recognition of student status for entitlements

Journey narrative

- 1 Registers for Erasmus+ but finds home university credentials do not work in Spanish systems
- 2 Struggles to access student discounts and local healthcare because his Polish student ID is not automatically accepted
- 3 Completes course enrolment via manual paperwork and mismatched timetables
- 4 Experiences slow and uncertain credit transfer back to Poland, risking delayed graduation
- 5 Returns home without a seamless, portable record beyond PDFs and emails

Interactions & actors

Erasmus+ programme offices, sending and host universities, transport operators, healthcare providers, national education authorities, student services

Break points

- Exchange frameworks are undermined by manual and paper-based processes.
- University identity systems are not interoperable.
- Rules for temporary entitlements in the host country are unclear.
- Student IDs and enrolment certificates are not mutually recognised.
- Host services distrust foreign proofs of status.
- Credits and course records are not portable in machine-readable form.
- Proof of enrolment and outcomes is not reusable across institutions.
- There are no agreed data models for the different types of evidences, f i what fields must be present in a diploma.

User needs

- Interoperable student ID and mobile app recognised by host services.
- Personal mobility wallet with verified enrolment, learning agreements, and attendance.
- Self-serve export of machine-readable course records ready for transfer.
- Full rollout of the Erasmus Without Paper for the handling of the mobility period, and EMREX for automated credit transfer.
- Standardisation via eIDAS 2.0 federation and Once-Only for education data.
- Policy alignment to recognise student status and entitlements during mobility.

Chiara: Intra-EU Degree Student

Profile & context

21-year-old Italian student enrolled in a master's program in Germany. Needs prior qualifications recognised and sustained access to housing, banking, health, and university services

Journey narrative

- 1 Applies to the German master's but recognition of her Italian degree takes months with duplicative requests
- 2 Cannot use her Italian eID to log into enrolment portals and must create new local credentials
- 3 Provides documents for housing and banking that are not automatically recognised across borders

- 4 Navigates difficult health insurance enrolment as portability is inconsistently understood between Italy and Germany
- 5 Encounters delays because transcripts are not easily portable, affecting scholarships and internships

Interactions & actors

Universities and student services, ENIC/NARIC networks, banking and housing providers, national health insurance bodies, municipal services

Break points

- Recognition processes vary by Member State and are opaque.
- Enrolment portals lack interoperability with foreign eIDs.
- Service providers apply inconsistent documentation rules.
- Foreign-issued degrees and documents are not consistently trusted by institutions and service providers.
- Health insurance status and entitlements are questioned across borders.
- Academic records and transcripts are not portable in verifiable digital form.
- Identity and residency proofs are not reusable across services.
- There are no agreed data models for the different types of evidences, f i what fields must be present in a diploma.

User needs

- Digital credential wallet storing verified degrees, transcripts, and proofs of insurance and residency.
- Cross-border eID to enable enrolment and access to services.
- Self-service record sharing for scholarships and internships.
- Broad adoption of eIDAS 2.0 by universities and public services.
- Full implementation of the European Student Card Initiative and EMREX.
- Once-Only Technical System support for student data exchange and enhanced mutual recognition of qualifications.

Jakob: Cross-Border Goods Shopper

Profile & context

36-year-old Austrian who shops for electronics and household goods across EU borders

Journey narrative

- 1 Orders products from Germany and Italy, but finds some are blocked from shipping to Austria
- 2 Faces hidden payment fees or card rejections, depending on the vendor
- 3 Struggles with inconsistent return policies and unclear refund timelines
- 4 Notices a flood of targeted ads after purchases, but has no way to stop or trace it

Interactions & actors

Online retailers, payment providers, logistics firms, consumer rights agencies, and digital advertisers

Break points

- Consumer rights directives are not consistently enforced across Member States.
- Return, warranty, and refund rules are opaque and fragmented.
- Advertising and tracking ecosystems are invisible to the user.
- Sellers distrust foreign-issued cards and payment methods.
- Uncertainty whether consumer rights are enforceable across borders.
- Consumers cannot easily export receipts, warranties, or purchase histories.
- No way to stop or redirect ad profiling linked to purchases.

User needs

- Digital wallet to store purchase records, warranties, and receipts in portable format.
- User-facing dashboard to view and control ad profiling after purchases.
- One-click return and warranty claims through standardised digital proofs.
- Stronger enforcement of consumer rights through digital compliance tools.
- EU-wide standard for interoperable e-receipts and warranties.
- Regulation requiring ad-tech profiling transparency and consent tracking.

Carmen: Digital Services Consumer

Profile & context

29-year-old Spaniard who books holidays online and uses streaming and fintech apps

Journey narrative

- 1 Plans a holiday but must re-enter personal details across airlines, hotels, and booking sites
- 2 Notices that prices rise after repeated searches without explanation
- 3 Experiences frustration when integrated AI tools automatically suggest itineraries and partner services, but cannot connect to her preferred providers, and she cannot see or compare details.
- 4 Feels worn down by constantly resetting accounts and is unsure how much data is being collected

Interactions & actors

Airlines, hotels, travel platforms, integrated AI travel assistants, fintech apps, data brokers

Break points

- Booking and subscription systems are siloed across multiple vendors.
- Lack of transparency in dynamic pricing and recommendation algorithms.
- Fragmented account creation and credentialing across services.
- New platforms don't recognise or import prior preferences.
- Integrated AI assistants are opaque about their market preferences and don't integrate users's preferred services.
- Consumers have little ability to contest algorithmic decisions.
- Preferences and booking histories are not portable between services.
- Repeated personal data entry across vendors undermines convenience.

User needs

- Trusted personal AI agents interoperable across data spaces, acting on behalf of individuals rather than vendors.
- Personal wallet for travel and service preferences that auto-fills across vendors.
- Portable playlists and profiles transferable between platforms.
- Clear, simplified view of dynamic pricing signals or recommendation factors.
- Once-Only Technical System applied to consumer booking data.

- Standards for interoperability of preference profiles across services.
- Algorithmic transparency requirements for dynamic pricing.

Katrin: Hybrid Consumer (Goods + Smart Services)

Profile & context

47-year-old German using online grocery services, connected devices, and a smart car

Journey narrative

- 1 Uses online groceries, a fitness tracker, and a connected car in daily life
- 2 Struggles when her smart appliance breaks, unsure whether a retailer, app provider, or manufacturer holds responsibility
- 3 Sees her car insurance premium rise after connecting a driving app, but isn't able to determine why and finds it difficult to search the market for more attractive offers.
- 4 Tries but fails to understand or control what her devices are sharing

Interactions & actors

IoT device manufacturers, app platforms, retailers, insurers, mobility services, and consumer protection authorities

Break points

- Overlapping responsibility between retailers, app providers, and manufacturers.
- Lack of transparency in insurance pricing linked to IoT data.
- Complex, unclear privacy settings across smart devices.
- Service providers distrust consumer claims without device/vendor verification.
- Consumers don't trust insurers or device vendors to be fair with telemetry.
- Device telemetry is not user-accessible or portable,
- Consumers cannot set clear purpose limits on what data flows to whom.

User needs

- Local dashboard showing what data each device shares and with whom.
- Controls to pause or restrict data flows by purpose.
- User-managed bundle of receipts and service entitlements for hybrid goods.

- Data portability and transparency tools enabling consumers to compare and switch services easily.
- IoT product certification requiring user-side visibility and control.
- Clear liability allocation between retailers, manufacturers, and service providers.
- Insurance and mobility rules requiring explainability of pricing linked to telemetry.

Key actors and relationships

Across the user journeys presented here, individuals interacted with a consistent set of actors to access digital services.

- 1 **Other individuals:** other individual users of shared platforms or platform services, including gig platforms for workers or health records platforms for patients.
- 2 **Platforms:** commercial or institutional services and infrastructures that control access to, and use of, digital goods and services within the Single Market (including marketplaces, labour platforms, health and education portals, and e-government gateways).
- 3 **Public Authorities:** national administrations with divergent levels of digital maturity and limited cross-border coordination, responsible for delivering digital public services and managing their digital engagement with citizens.
- 4 **Businesses:** small and large companies that provide B2B, B2B2C or B2G2C digital services, whose value chain remains largely opaque and unaccountable to individuals.
- 5 **Data Intermediaries:** private and public sector organisations that facilitate digital transactions and data exchanges between individuals and other actors in the digital single market. These might include platforms or public authorities, or also be independent third businesses and services, such as the Data Intermediation Service Providers anticipated by the EU Data Governance Act.³⁰

These interactions were typically bilateral between individuals and a single other actor and could generally be categorised according to four specific types of interactions. These include **Identity Interactions**, understood as processes through which people authenticate themselves, assert rights, and gain access to services across borders and sectors. Often Identity interactions also involve **Trust**

³⁰ See <https://digital-strategy.ec.europa.eu/en/policies/data-intermediary-services>.

Validations, through which reliability and accountability are verified, such as certification, auditing, transparency dashboards, or reputation systems, and which often involve identity interactions. Another type of interaction involves **Data Flows**, understood as exchanges of information between parties either as a condition for accessing and using services, as a transaction in which

value is assigned to data, or as the execution of a service in which the data is the content and object of that service. Lastly and relatedly, we note the prominence of **Value Exchanges**, understood as economic or administrative transactions that translate digital processes into tangible outcomes such as payments, benefits, or entitlements.

Table 3. Actors and interactions in Europe's DSM.

Interaction Type	Other Individuals	Platforms	Public Authorities	Businesses	Data Intermediaries
Identity interactions (How people prove who they are, or what status they have)	Social identity, informal reputation, profile presence	Platform account login; platform-managed identity; platform-scoped reputation	National eID, documents, residence statuses, civil registry identity	Customer accounts, loyalty IDs, KYC for certain services	Delegated identity verification; federated login; authenticated credential wallets
Trust validation (How reliability and accountability are signalled)	Peer ratings, endorsements, "social proof"	Algorithmic ranking, star ratings, moderation & enforcement	Official certification, eligibility checks, licensing, legal status	Brand trust, customer service record, warranty terms	Auditing, timestamping, provenance verification, attestation services
Data flows (What information moves and how)	Messages, shared content, reputation signals	Usage data, behavioural tracking, metadata, purchase/work history	Personal records, benefits data, compliance documents	Transaction records, CRM profiles, telemetry	Credential issuance, consent logs, secure transfers
Value exchanges (What becomes tangible: money, benefits, rights)	Social capital / community belonging	Fees, commissions, platform access	Payments, benefits, access to public services	Purchases, subscriptions, rewards	Verification-as-a-service, clearing, settlement

Applying a systems analysis to the 14 user journeys collected here suggests that the most important obstacles to individuals' engagement with the digital single market are rooted in the relational aspects of how digital systems are designed. Systems have been built to connect institutions, without prioritising how individual people connect their data, their rights, or their choices to goods and services in the digital single market.

This highlights a power imbalance between individuals and other actors with whom they engage in the digital single market. The structural drivers of institution-centric interoperability, centralised power but diffused responsibility, organisational compliance without

end-user engagement together privilege platforms, public agencies, private businesses and intermediaries at the structural expense of individual consumers, citizens, and entrepreneurs.

It is worth noting, however, that these privileged actors are not necessarily the same ones with the power to define the structure and design of the digital single market, and thereby assert their privileged position within it. Nor is it clearly the European Commission alone who is responsible for this design. Indeed, a review of recent scholarship shows that the DSM has developed through polycentric governance, driven by overlapping incentives and compromises across multiple centres of authority.³¹

³¹ König, 2022; Sabel & Zeitlin, 2010

At least four categories of stakeholders, sometimes overlapping with the actors at play in the Digital single market, can be seen as defining the structure and dynamics of the market.

Polymakers

This group includes EU institutions such as the European Commission, Parliament, and Council, as well as national ministries and representatives to the EU who shape and assert digital and industrial strategies. They set the overarching rules, frameworks, and funding priorities that define the DSM's direction. Because policymaking is distributed across levels and sectors, coherence depends on how effectively these actors coordinate.

Regulators

Regulators such as national data protection authorities, competition agencies, and competent authorities, translate broad policy goals into enforceable norms. They form the connective tissue of the DSM's polycentric governance, mediating between EU objectives and national contexts, often providing the expertise according to which national policymakers implement EU directives. Their interpretive and enforcement choices determine how digital rights, interoperability, and market fairness are realised in practice, making them key partners for ensuring consistent, trust-based digital governance.

Public service providers

Public and public interest bodies and agencies delivering digital infrastructure and services operationalise many DSM principles and provide services at the core of the market. They are both implementers and beneficiaries of digital integration, and they are responsible for interoperability, cross-border services, and citizen trust.

Businesses

From major platforms and telecom providers to SMEs and boutique data intermediaries, businesses drive innovation and shape market realities within the DSM. They co-create standards, infrastructures, and trust frameworks alongside public authorities. Most importantly, the business models, governance structures and user interfaces of the most powerful companies and services hardwire norms and practices into the practice of the digital market, creating "facts on the ground" that can impede or encourage regulatory or policy action.

Structural patterns

The persistence of these breaks points to deeper structural dynamics that shape how Europe's digital infrastructures have evolved. Beneath the surface, three intertwined patterns explain why the same obstacles recur across such different user journeys.

Firstly, Europe's digital integration efforts have made significant progress in connecting public systems across borders. Yet they remain dominated by a logic of **institution-centric interoperability**. What is being connected are institutions — tax authorities, health ministries, education portals — rather than people's experiences of those systems. This form of interoperability can succeed administratively while failing experientially. A freelancer or student may be technically represented in multiple databases yet still must repeat each process by hand because there is no mechanism for personal continuity. The underlying driver is structural: interoperability has been treated as a back-end problem of technical integration rather than a front-end problem of relational design. The result is a single market that is digitally unified in infrastructure but socially fragmented in practice, limiting the ability of individual users to directly benefit from the system.

Secondly, the journeys reveal a consistent pattern of **centralised power but diffused responsibility**, whereby decision-making power is concentrated within organisations (be they ministries, platform algorithms, or national data controllers) while responsibility for outcomes is dispersed. No single actor feels answerable for the cumulative user experience. This centralisation without coordination generates opacity and procedural inertia. A platform worker cannot appeal an automated suspension because no one takes ownership of the algorithm's judgment; a patient cannot trace a missing e-prescription because each institution insists it followed protocol. The structural driver is a governance culture designed to minimise liability rather than maximise responsiveness. Digital services are built to be auditable, not accountable, leaving individuals to navigate a system where many parties act correctly yet no one ensures fairness.

Thirdly, European regulatory frameworks prioritise **organisational compliance without end-user outcomes**. Europeans' data rights to access, portability, and consent are often delivered through mechanisms that satisfy legal form without supporting practical agency, if they are enforced in the first place. Often, the complexity of complaint and redress mechanisms, and of the wider digital ecosystems in which they exist, can be a deterrent. Although individuals may request access to their data, often the information returned is so opaque

or fragmented that it undermines the very purpose of data rights and agency. Similarly, even if consent can be formally withdrawn, this can be difficult to confirm and enforce, and often individuals face structural obstacles to finding alternative services.

This reflects a widespread cultural and institutional mindset that prioritises compliance and risk avoidance over the agency and empowerment of European citizens and consumers. In both the private and public sector, architects and digital service designers optimise for legal certainty, producing interfaces that inform rather than empower. The result is a paradoxical transparency: citizens are surrounded by notices, alerts, and disclosures, yet lack actionable information to help them secure their digital rights and efficiently access to digital goods and services.

These underlying patterns contribute to the persistent recurrence of system failures related to fragmentation, opacity, recognition failures, and control gaps. Often, we see these failures converging in single user journeys, contributing to an erosion of trust in the fairness, effectiveness, and coherence of the DSM, which may also be systemic, and have wide-spread consequences. This erosion does not manifest evenly, however. Experienced users develop coping strategies, such as maintaining spreadsheets, relying on personal contacts, or retreating to dominant platforms that “just work.” Others simply opt out of cross-border opportunities. The result is a system that operates efficiently for institutions and power users but can be unreliable for ordinary citizens.

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