

Ageing in digital societies: enablers and barriers to older persons exercising their social rights

Croatia

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1 Legal and policy framework

1.1 National legislation on digital public administration

According to the Central State Office for the Development of the Digital Society, at the end of 2021, about 1.5 million users were registered in the e-Citizens system, which means that a large part of citizens still use public administration services in the "traditional" way.

National legislation does not recognize the equal right for all to the access to public services undergoing digital transition, including older persons and persons with disabilities, with the exception of Act on the Right to Access Information¹ where it is stated that "the right to access information and reuse information belongs to all users in the same way and under the same conditions".

On 15 July 2014, the Croatian Parliament adopted the Law on the State Information Infrastructure.² The act established a central government portal system as a single point of contact in the virtual world. Croatia has a comprehensive framework of laws and regulations in place for exercising eGovernance, which is supplemented by the Electronic Document Act³, the Information Security and Confidentiality Act⁴, the Act on the Right to Access Information⁵, the Law on Cybersecurity for Key Service Providers and Digital Service Providers⁶ and General Administrative Procedure Act.⁷

Law on Accessibility of Websites and Software Solutions for Mobile Devices of Public Sector Bodies⁸ sets out measures to ensure the accessibility of websites and software solutions of public sector bodies to users, especially persons with disabilities.

¹ Croatia, [Act on the Right to Access Information](#) (*Zakon o pravu na pristup informacijama*), Official Gazette (*Narodne novine*) No 25/2013.

² Croatia, [Law on the State Information Infrastructure](#) (*Zakon o državnoj informacijskoj infrastrukturi*), Official Gazette (*Narodne novine*) No 92/2014.

³ Croatia, [Electronic Document Act](#) (*Zakon o elektroničkoj ispravi*), Official Gazette (*Narodne novine*) No 150/2005.

⁴ Croatia, [Information Security and Confidentiality Act](#) (*Zakon o informacijskoj sigurnosti*), Official Gazette (*Narodne novine*) No 79/2007.

⁵ Croatia, [Act on the Right to Access Information](#) (*Zakon o pravu na pristup informacijama*), Official Gazette (*Narodne novine*) No 25/2013.

⁶ Croatia, [Law on Cybersecurity for Key Service Providers and Digital Service Providers](#) (*Zakon o kibernetičkoj sigurnosti operatora ključnih usluga i davatelja digitalnih usluga*) Official Gazette (*Narodne novine*) No 64/2018.

⁷ Croatia, [Amendments to General Administrative Procedure Act](#) (*Zakon o izmjenama i dopuni Zakona o općem upravnom postupku*), Official Gazette (*Narodne novine*) No 110/21.

⁸ Croatia, [Law on Accessibility of Websites and Software Solutions for Mobile Devices of Public Sector Bodies](#) (*Zakon o pristupačnosti mrežnih stranica i programskih rješenja za pokretne uređaje tijela javnog sektora*), Official Gazette (*Narodne novine*) No 17/2019.

In 2021, the provisions of the General Administrative Procedure Act⁹ have been amended, the main goal of which is to speed up and simplify administrative procedures using information and communication technology, while the use of electronic communication in all phases of administrative procedure should reduce costs for parties and public bodies.

1.2 National policy, strategy or action plan on the digitalisation of public services or digital inclusion

The National Plan for the Development of Public Administration 2021-2027¹⁰ envisages "Digital Transformation of Public Administration" as one of its goals. Within the above, it is planned to establish a single contact center for all public e-services in order to provide customer support. In addition, targeted training is envisaged to be conducted to strengthen the digital literacy of public administration officers but also certain groups of users, including older people and people with disabilities.

The Ombudswoman, in her annual report¹¹, recommended that all public bodies clearly list the services they provide and provide a brief description of the procedures on their websites and in the premises where they receive citizens. Furthermore, in her annual report, the Ombudswoman recommended that all public bodies clearly list the services they provide and provide a brief description of the procedures on their websites and in the premises where they receive citizens.

1.3 National recovery and resilience plans covering the digitalisation of public services

National recovery and resilience plan¹², the chapter about gender equality and equal opportunities, recognises older people and people with disabilities as vulnerable groups. Moreover, the Plan defines measures to close digital exclusion; infrastructure measures are envisaged that will enable access to very large capacity networks which is expected to have a positive effect on the equal opportunities of all citizens of Croatia. Furthermore, the introduction of a model for hybrid approach to the workplace - smartworking (C2.2. R2-I2)¹³ will help to increase the inclusion of people with disabilities in the labor market. Measures

⁹ Croatia, [Amendments to General Administrative Procedure Act](#) (*Zakon o izmjenama i dopuni Zakona o općem upravnom postupku*), Official Gazette (Narodne novine) No 110/21.

¹⁰ Croatia, [Draft of the National Plan for the Development of Public Administration 2021–2027](#) (*Nacrt prijedloga Nacionalnog plana za razvoja javne uprave od 2021. do 2027. godine*) (January 2022).

¹¹ Croatia, Ombudsperson's Office (*Ured pučke pravobraniteljice*), [Annual Ombudsman Report for 2021](#) (2022).

¹² Croatia, Government of the Republic of Croatia, [National recovery and resilience plan](#) (*Nacionalni plan oporavka i otpornosti 2021. – 2026.*) (2021).

¹³ Croatia, Government of the Republic of Croatia, [National recovery and resilience plan](#) (*Nacionalni plan oporavka i otpornosti 2021. – 2026.*) (2021).

(C1.4. R1-I2)¹⁴ are related to better accessibility of digital transport solutions for people with disabilities. They also include conducting trainings to strengthen their digital literacy. In addition, as part of the digitization of public administration services (C2.3. R2-I2)¹⁵ it is planned to conduct targeted education and training for the formation and strengthening of digital literacy of certain groups of users, which may include older people, people with disabilities, Roma people.

2 Programmes and practices aimed at ensuring equal access to public services in the digital age

Public sector bodies are obliged to adapt their digital content and services in accordance with the European standard EN 301 549.¹⁶ To help adapt their pages, public sector bodies can use the Guidelines for ensuring digital accessibility¹⁷ developed by CARNET (Croatian Academic and Research Network). These guidelines contain minimum requirements for digital accessibility and are continuously revised and supplemented by CARNET, with prior consultation with the expert community and relevant stakeholders.

Target groups are persons with visual impairment, persons with hearing impairment and speech-voice disorders, persons with motoric disorders, chronic diseases and multiple difficulties and persons with specific learning disabilities.

In Croatia, there are no such reports on programmes and practices aimed at ensuring equal access to public services in the digital age. The only information available in regards to older persons and digitalisation are the ones regarding the use of social media and communications platforms. In 2020, Hrvatski Telekom has launched a National digital education program for the older persons in the cooperation with the Volunteer Center Zagreb. The Program consists of easy-to-understand educational videos through which older persons can easily learn how to use various digital tools that will enable them to be connected with their families and friends. On that occasion, Hrvatski Telekom donated tablets and free internet access to 30 Homes for the Elderly.^{18 19}

¹⁴ Croatia, Government of the Republic of Croatia, [National recovery and resilience plan](#) (*Nacionalni plan oporavka i otpornosti 2021. – 2026.*) (2021).

¹⁵ Croatia, Government of the Republic of Croatia, [National recovery and resilience plan](#) (*Nacionalni plan oporavka i otpornosti 2021. – 2026.*) (2021).

¹⁶ European Commission. [Accessibility requirements for ICT products and services](#). (March 2021).

¹⁷ Croatia, Croatian Academic and Research Network (*Hrvatska akademska i istraživačka mreža - CARNET*), [Guidelines for ensuring digital accessibility](#) (*Smjernice za osiguravanje digitalne pristupačnosti*). (2019).

¹⁸ Croatia, National Digital Education Program „Generations together“ ([Nacionalni program digitalne edukacije starijih osoba „Generacije zajedno“](#)) (2020), conference on sustainable development held on 9 and 10 November 2021.

¹⁹ Croatia, T-portal news platform. Article „Croatian Telecom starts national digital education program for elderly in Croatia“ ([Hrvatski Telekom pokrenuo nacionalni program digitalne edukacije starijih osoba u Hrvatskoj](#)), 10 December 2020.

3 Research and data focused on equal access to public services in the digital age

According to the Ombudswoman²⁰, during 2021 her Office received 20 complaints of possible discrimination based on age, and 7 complaints of multiple discrimination, in which age was cited as one of the grounds for discrimination. 6 out of the 27 complaints concerned the area of access to goods and services. It is important to point out that, unless the complaint explicitly refers to age discrimination when it is necessary to state whether it is a young person or an older person, the Ombudsperson's office has no information about the complainant's age.

As for the gender of the complainants, 15 of them were men, 5 women, and the other 7 complaints were sent from other service providers (civil society organizations, anonymous persons, legal entities, etc.)

During 2021, the Ombudswoman received only 3 complaints related to digitized services, all of which were sent by male complainants. Two of them related to the use of digital applications for keeping the list of retained catches and providing these data to the fishing rights holder, stating that the use of digital applications causes potential users the cost of purchasing electronic equipment and paying operators, which discourages people with lower assets. The third complaint was related to the abolition of the portal *zdravlje.net* for patients and it expressed suspicion of violating the principle of equality of certain categories of citizens, including the elderly. As the mentioned Portal became a part of the e-Citizens portal, it was essentially a matter of improving and upgrading the already existing digital service, which was also implemented in order to protect personal data.

Analysis of public opinion research data and examination of the needs of digital inclusion of vulnerable groups²¹ was conducted by University of Zagreb and Faculty of Organization and Informatics Varaždin (FOI) within Digital Literacy Development Network.

Data collection regarding the need for digital inclusion of vulnerable groups was conducted in the City of Zagreb and Zagreb County, Varaždin County and Primorje-Gorski Kotar County. The target groups in this study are people with disabilities, pensioners, residents of rural areas and residents of island areas. Data collection was carried out using the paper-pen method by delivering questionnaires by mail and online. In the empirical part of the research, 540 respondents completed the questionnaire and this number of questionnaires was taken as the final one for conducting statistical analysis.

²⁰ Croatia. Ombudsperson's Office (*Ured pučke pravobraniteljice*), email correspondence, 6 May 2022.

²¹ Croatia, Faculty of Organization and Informatics Varaždin (FOI) (*Fakultet organizacije i informatike Varaždin*), email correspondence 4 May 2022.

According to gender, the majority of respondents in the survey were females (63.9%), while a total of 195 respondents (36.1%) participated in males. According to age groups, the age group of 65-74 years prevailed the most, and the age group of 16-24 years the least. Altogether, 57.2% of the participants were older than 55 years old. However, respondents' responses were processed in bulk and each individual response was not correlated with respondent's age. At this stage we have requested the above data but have not yet received it.

The research covered several topics including the use of digital public services with the main focus on e-Citizens service. The results show that 54.1% of respondents said that they either do not use or do not need digital public service. The use of the e-Citizens service is not considered necessary by as many as 35.6% of respondents, while 21.3% said they needed help using it. Most respondents stated that the reason for non-use was that they do not have enough knowledge and skills (28.9%). The largest percentage of respondents (36.7%) stated that they use the service to download official forms (via the e-Citizens portal) and download certificates and excerpts from official registers such as COVID-19 certificate, certificate of impunity / residence (33.7%).

Of those who have stated that they use these services, most are satisfied with the way they function (54.2%), the appearance of the interface (53.5%) and they use the service independently (59.1%).



4 State of digitalisation of selected public services

		Selected public services relevant for older persons			
		Access to health records	Public statutory pensions	Social benefits	Other (as relevant in your context)
Stage of digitalisation	Not digitalised (Y/N)	N	N	N	
	Information is available online (Y/N)	N	N	N	
	Transactions are possible online (Y/N)	N	N	N	
Recognition of groups at risk of digital exclusion	Service specific regulation recognises barriers to digital inclusion / vulnerable and disadvantaged groups (Y/N).	N	N	N	
	If yes , please list the barriers and groups that are mentioned.	The Government of the Republic of Croatia seeks to make its websites accessible in accordance with the Act on Accessibility of Websites and Software Solutions for Mobile Devices of Public Sector Bodies of the Republic of Croatia. This Declaration of Accessibility applies to the e-Citizens system. The network headquarters of the e-Citizens portal is partially compliant with the Act due to non-compliance (inaccessible content) listed below. Inaccessible content: a) some of the uploaded	The Croatian Pension Insurance Institute is obliged to ensure the accessibility of its network headquarters in accordance with the Act on Accessibility of Websites and Software Solutions for Mobile Devices of Public Sector Bodies. The website of the Croatian Pension Insurance Institute www.mirovinsko.hr is partially in line with the Law on Accessibility of Websites and Software Solutions for Mobile Devices of Public Sector Bodies of 23 September 2019 and Directive (EU)	The Government of the Republic of Croatia seeks to make its websites accessible in accordance with the Act on Accessibility of Websites and Software Solutions for Mobile Devices of Public Sector Bodies of the Republic of Croatia (Official Gazette 17/19; hereinafter: the Act) EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of public sector bodies' websites and mobile applications (OJ L 327, 2.12.2016).	

		<p>documents are not available in machine-readable form, b) it is not possible to turn on the option to automatically correct text entry errors, c) the content of individual links is not clearly described.</p>	<p>2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of websites and mobile applications of public sector bodies due to certain non-compliances or exceptions listed below. Inaccessible content: a) non-compliance with the Law on Accessibility of Websites and Software Solutions for Mobile Devices of Public Sector Bodies of the Republic of Croatia: In terms of using standard elements for HTML forms (HTML form elements) that allow easier and logical navigation on the web page, options for automatic correction of text input errors and all other auxiliary solutions are included. The official YouTube channel of the Croatian Pension Insurance Institute and the consequently available functionalities or limitations of the YouTube platform are used to ensure accessibility</p>	<p>This Declaration of Accessibility applies to the e-Citizens system. The network headquarters of the e-Citizens portal is partially compliant with the Act due to non-compliance (inaccessible content) listed below. Inaccessible content: a) some of the uploaded documents are not available in machine-readable form, b) it is not possible to turn on the option to automatically correct text entry errors, c) the content of individual links is not clearly described.</p>	
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			<p>requirements for audio and video of the website. PDF files on all web pages are not entirely created by exporting from a source file from Microsoft Office Word, with accessibility options selected, but by scanning printed documents, and are not accessible because they are not properly prepared for screen readers. b) disproportionate load: The Croatian Pension Insurance Institute for all non-compliances listed in point a) temporarily invokes an exception due to disproportionate burden in terms of Article 8 of the Law on Accessibility of Websites and Software Solutions for Mobile Devices of Public Sector Bodies of 23 September 2019. b) the content is not within the scope of the Law on Accessibility of Websites and Software Solutions for Mobile Devices of Public Sector Bodies of the Republic of Croatia: Croatian Pension Insurance Institute, in accordance with Article 3</p>		
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			of the Law on Accessibility of Websites and Software Solutions for Mobile Devices of Public Sector Bodies of 23 September 2019, the contents of websites, including various forms of office files (eg PDF files), previously recorded media content in the form of audio and / or video, audio and / or video combined with interaction, internet maps and other qualifies as an archive and as such is exempt from the application of the Act. For the purposes of this Act, archives are all contents that are not required by the Croatian Pension Insurance Institute for ongoing proceedings, nor are they updated or edited after 23 September 2019.		
Multichannel access options	Telephone service (Y/N) If yes, please describe what kind of personalised services it provides.	Y Customer service: help with using the e-Citizens portal	Y Customer service: info phone	Y Customer service: help with using the e-Citizens portal	
	Physical administrative access points (Y/N). If yes, please specify the level of availability (local, regional, national), the opening days and hours.	N	Y Local (opening days and hours depend on the place/city/island, but offices are generally open	N	

			Monday to Friday from 8 a.m. to 4 p.m.)		
	<p>Specific locations that facilitate offline access to the service (Y/N) If yes, indicate the location(s). Please describe what kind of support is provided.</p>	Y (local) Hospitals and doctor's offices: ordering an examination, prescribing recipes...	Y (local) Information on the payment of pensions, invalidity pension...	Y (local) Social welfare centres: adult accommodation, entitlement to personal disability benefits...	
	<p>Specific locations that facilitate online access to the service (Y/N). If yes, indicate the location(s). Please describe what kind of support is provided.</p>	N	N	N	
	<p>Other – please indicate any other access channels to the service.</p>	E-mail: customer service	E-mail: customer service	E-mail: customer service	
<p>Other forms of support for online use</p>	<p>Please indicate any other form of support to facilitate the use of the online service for older persons such as easy-to-read versions, different language versions, etc.</p>	Visual impairment adjustment; adjustment to dyslexia; increase and decrease of the font.	Change of the background color of the web page; increase and decrease of the font.	Visual impairment adjustment; adjustment to dyslexia; increase and decrease of the font.	