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Public services in different countries of the world: a comparative analysis

Abstract. The aim of this research is to study and compare public services in such countries of the world like England, USA, Singapore, Republic of Korea, France, Germany, Canada, Finland, Russia. In this article, we have studied the state of public services in nine countries, which was made by the method of comparative analysis. In our benchmarking study, we used the 2020 United Nations Biennial Reviews, reports, regulations, and statistics. To study the state of public services in the countries we have identified, we used the following criteria for analysis: historical aspect, electronic services, legal norms, services in systems. We have analyzed and interpreted the historical process of creating public services and e-governments for each country; the historical developments of e-government for each country were explained; legal mechanisms in the analyzed countries are defined. The final part of the article presents some suggestions and recommendations for improving public services in the countries studied.

Keywords: public services, quality of public services, quality management, comparative analysis, quality models of public services.

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Introduction

At the United Nations (UN) Summit as of September 2015, there was adopted an ambitious roadmap by world leaders that will guide the sustainable development of all countries in over the next 15 years. This Agenda, titled «Transforming Our World: A 2030 Agenda for Sustainable Development», defines 17 SDGs (Sustainable Development Goals) and 169 targets to spur action for people, the planet, peace, prosperity and cooperation. After adoption of the 2030 Agenda, a transformative common vision based on solidarity and shared responsibility has directed the efforts of states, civil society, the private sector and other stakeholders towards eradicating poverty and creating a better world for all. Governments were encouraged to tap into the potential of ICTs through whole-of-government policies that are closely related towards a broader national policy to achieve the SDGs. Success requires a whole-of-government approach at the level of ministries and departments, as well as cooperation with non-state entities. This approach must be backed by high-level political will like an effective intergovernmental institution with allocated financial resources and decision-making authority. To maximize the potential of ICT, an appropriate infrastructure is also required in order to enable interoperability and digital operations within the public sector, especially in the delivery of public services. The problem of providing public services has a thousand-year history, since some rudiments of public services can be found in ancient China, since already in the 6th-7th centuries irrigation, a system of canals, grain reserves were in the department of the state. In ancient Rome, pension subsidies and taxes were under the special control of the state [1].

The purpose of this study is to learn and compare public services in England, USA, Singapore, Republic of Korea, France, Germany, Canada, Finland, Russia. In this study, we will examine the process of providing public services in nine countries using the method of comparative research.

The process of delivery of public services of the countries was considered in accordance with the selected criteria, which are given below:

- Analysis of the historical development of public service delivery;
- Legal framework for the provision of public services;
- Electronic government services available in the countries covered.

Each indicator was studied through analytical reflection on scientific literature, review articles, written materials, official government publications, newspapers, world reports.

In conclusion, the results and recommendations of a comparative analysis were made to improve the whole process of providing public services in the countries studied.

Object of study: the public services. Subject of study: the comparative analysis of public services in nine countries.

Literature review

In this part, we presented a comparative analysis of public services provision by different authors for a more complete understanding of the problem. We analyzed the degree of knowledge of the problem of providing public services. Thus, Chen (2006) studied the e-government strategies of developed and developing countries. As a result of the study, they proposed a conceptual framework for identifying critical success factors for e-government in the countries reviewed. Matei and Savulescu (2011), e-government status and ICT development levels in 11 Balkan countries. They used the results of the 2010 United Nations e-government study reports, which are conducted every two years. Moreover, it was noted that the e-government activity in the countries increased in comparison with 2008 and began to comply with European standards. Another study by Zefferer (2011) compared countries in terms of e-services defined in seven European countries: Estonia, Germany, the Netherlands, Spain, Austria, Turkey and the UK. The European Commission's e-government benchmarks define life events; Electronic identity, qualified electronic signature, tax systems, births, social security benefits, certificates, residence and relocation, company formation. As a result of the study, it was reported that only the Estonian service offered these eight services to its citizens. In a study by Alshomrani (2011), the United States and Saudi Arabia e-government scores were compared. The study took into account e-government reports published by the United Nations, the United States and Saudi Arabia. Within the framework of this study, e-government portals and various research results were used for documentary research. In 2015, another comparative study was conducted by Jonathon, Ayo and Misra in Nigeria and the Republic of Korea.

As a result of the literature review, it was noted that there are few studies comparing different countries. According to the UN E-Government Development Study published in 2020, the Republic of Korea ranked 2nd EGDI Index - 0.9560; Finland 4th place EGDI -0.9452; Great Britain 7th place in the EGDI rating - 0.9358; USA 9th place in the ranking, EGDI -0.9297; Singapore 11th; EGDI - 0.9150; France 19th place EGDI - 0.8718; Germany 25th place EGDI- 0.8524; Canada 28th place EGDI -0.8420; Kazakhstan 29th place in the EGDI rating -0.8375; Russia took 36th place EGDI- 0.8244. Thus, the differences between countries will be presented and proposals for these countries will be made.

Research methods

In this study, comparative analysis method was used to analyze the current state of the samples.

Data for this study was collected from various sources. We also studied the e-government portals of the studied countries. In addition, academic studies, studies, reports, legal regulations and e-government statistics were studied in these countries. We also used the United Nations Report 2020, which is published every two years. A total of 11 reports have been issued by 2020. It took some time to find the optimal frequency of their appearance, so some reports were published annually, while others waited for their appearance for several years. Since 2008, the E-Government Survey has been released every two years.

Results and discussion

In this part, to better understand the current situation in matters of public services and e-Government we have analyzed the UN study data published in 2018. It included the study of 9 countries, such as the Republic of Korea, Singapore, Finland, the UK, France, Germany, Russia, the USA and Canada. Since 2008, it has been held and published every two years. We have studied the results of published surveys of 2018 and 2020.

Republic of Korea tops the list of the countries in online services provision in 2020, followed by such countries as Finland, the UK, the USA and Singapore.

The E-Government Development Index (EGDI) is a composite index that measures the state of e-government development in countries. It is composed of three dimensions: the online service index, the telecommunication infrastructure index, and the human capital index. E-Government Development Index in most of these countries out of 193 of them were in the upper middle income range. If we compare the EGDI Index of 2018 with 2020, the report showed progress on this index in South Korea, Finland and the USA, taking 2d, 4th and 9th ranks respectively in 2020.

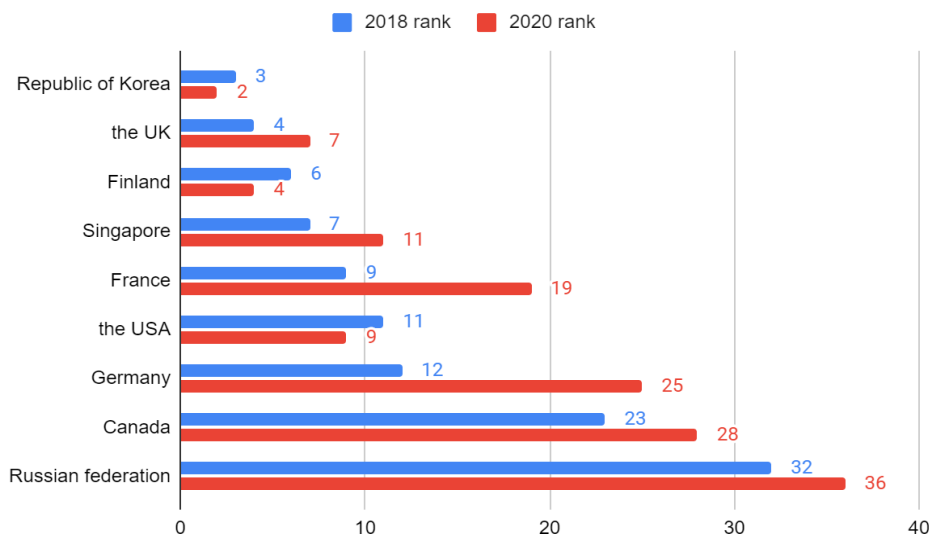


Table 1 E-Government Development Index rank of 2018 and 2020
 Note: Compiled by the author

Thus, we can note considerably high levels of development of public service online in these countries. We have also pointed out the focus of e-government and some of the governmental initiatives in 2018-2020 in the provision of public services country by country which is available in table 2.

Country	Focus of digital transformation and e-government services	Example of government initiative	Aim of the initiative
UK	improving accessibility and efficiency.	launched the NHS app in 2018	allows users to book appointments, order prescriptions, and access medical records online
		launched a digital identity pilot program in 2020	provide a secure and convenient way for citizens to access government services online.

USA	enhancing the user experience and increasing efficiency	the Federal Electronic Records Modernization Initiative in 2018	to modernize and streamline the management of federal electronic records
		a new website in 2020	to provide a more user-friendly and accessible platform for citizens to access government services online.
Singapore	digital transformation and innovation.	the Smart Nation initiative	to harness technology to improve the quality of life for citizens
Republic of Korea	improving accessibility and convenience for citizens	e-government initiatives MyData service	allows citizens to access and manage their personal information online.
France	enhancing the user experience and increasing efficiency	launched the France Connect platform in 2018	allows users to access multiple government services using a single login.
Germany	improving accessibility and efficiency	launched the eIDAS initiative in 2018	to create a single digital identity framework for citizens and businesses across the European Union
Canada	enhancing the user experience and increasing efficiency	launched the My Service Canada Account in 2018	allows users to access a range of government services online.
Finland	improving accessibility and convenience for citizens	launched the Suomi.fi portal in 2018	provides a single point of access for citizens to government services online
		e-government initiatives of introduction of a digital passport for citizens.	
Russia	improving accessibility and efficiency	launched the Digital Economy program in 2018	to develop the digital infrastructure and digital services in the country.

As you can see from table 2, all the mentioned countries were actively working on improving their positions in terms of digital transformation and e-government services, launching different initiatives, which we suppose helped in the times of Covid-19. Moreover, currently, such countries as England, Germany,

USA, the Republic of Korea etc., which implement various quality standards (more than 400,000 certified systems) and occupy high positions in the implementation of the quality of public services, are supported at the Governmental level. For example, they hold various competitions in the field of quality of services, based on the results of which countries are awarded. The most famous of them are: Deming (Japan), Baldrige (Latin American) and European [2].

Let's give the main points of the services provided in 9 countries of the world in accordance with analysis of the historical development of public service delivery, their legal framework and e-government services available.

One of the leading positions in public services provision is occupied by *the UK*. The development of public service delivery in England dates back to the 19th century, when the government began to provide public services such as healthcare, education, and social welfare. The idea of reforming public services was first announced in the first half of the 20th century. It happened because it was necessary to save basic resources and find additional ones to solve increasingly complex and resource-intensive management tasks. "New public management" concept included the following main principles:

- competition development on the part of the state in the provision of public services;
- the focus of the state on expanding the rights of citizens, primarily in the field of local self-government;
- the main criterion for the quality and efficiency of the work of state institutions and municipal services is the result evaluated by citizens;
- focus on missions, and not on bureaucratic documents;
- adaptation to the needs of a citizen as a client and consumer of services provided by the state;
- decentralization of management;
- reducing costs while increasing income.

These principles were inherited and developed in the modern concept of electronic public services. [3;4]

In the mid 80-s to the early 90s, there were different initiatives aiming at improving the quality of public services and its standardization. We can name such: Financial Management Initiative plan, "Improving the management of the work of the government" message, the "Charter of Citizens". The latter one, proclaimed the postulates underlying the functioning of public authorities that provide state and other services to the population. The following were put forward as the main postulates of the functioning of public services:

- specific types of public services,
- transparency and coverage of information,
- consulting service recipients and the possibility of providing alternatives
- effectiveness of a particular service [3].

A pioneer in the development and subsequent development of e-government, according to I.G. Minerina, is *the USA*. It has a long history, dating back to the founding of the country. However, the modern system of public service delivery began to take shape in the early 20th century, with the introduction of reforms such as the New Deal in the 1930s and the establishment of the Social Security system in 1935. Since then, the government has continued to provide public services in areas such as healthcare, education, and social welfare, although the exact nature of these services has varied depending on the political climate and the priorities of each administration.

In 1980, the theoretical foundations of its development appeared, and since 1993, the active penetration of IT into the public sphere began [5].

A. Barkin, V. Drozhzhinov, Yu. Travkin believe that the E-Government act adopted in 2002 in the United States made it possible to improve the management processes and quality of public services: organs; increasing the availability of information about their activities; advanced training of civil servants; improved manageability; eliminating the digital divide; simplicity and accessibility of using government information [6].

The government's official web portal ("www.U.S.A.gov") connects federal, state and local government websites, hosts nearly 30 million web pages, and provides over 1,000 online forms and real-world services. Classified sections of services: "public goods", "state grants", "government works", "obtaining licenses", "social security issues", "obtaining passports", "immigration", "consumer announcements and applications" and much more. The portal provides the possibility of an interactive dialogue in real time [6].

An active program to automate public services began during the presidency of President Barack Obama, and it covered citizens, businesses, and government agencies. The e-government infrastructure is not limited to the public sector; it is characterized by the participation of governmental, non-governmental organizations. The US e-government strategy involves the development of multi-channel, inclusive access to government services. The policy to optimize and automate public services has created: the involvement of citizens in decision-making; enhance the role of local communities; create new ways to participate in public administration and channels for obtaining information; minimize the risks associated with the safety of information [7]. Self-control is used in the provision of services. CORE experts monitor quality assurance and check the quality of service once a year and issue a certificate based on the results of the checks. In the US, a good regulatory framework has been prepared: the E-Government Strategy (E-Government Strategy. Implementing the Presidential Agenda for e-Government. Simplified Service Delivery to Citizens. February 27, 2002). The Strategy outlines the goals and principles of creating "electronic government", problems and barriers to its construction, describes the principles for implementing the strategy and 24 presidential initiatives in the field of creating "e-government". E-Government Strategy (E-Government Strategy. Implementing the President's Management Agenda For E-Government. April 2003). This document contains a summary of the main provisions of the previous strategy, describes the achievements of the Federal Government in the field of creating "e-government" in the past year 2002, and also sets priorities and benchmarks for 2003-2004. The appendix to the document contains a detailed summary of achievements for each of the 24 presidential initiatives, methods for measuring progress, as well as key reference points for their further implementation. In addition, it contains an action plan for implementing the initiatives provided by the E-Government Act of 2002.

The greatest interest among scientists is the *Singapore* model for the provision of public services. In the ranking conducted by the UN in 2020, Singapore ranks 2nd among Asian states [8]. In Singapore, there is no classical system for it, as there are no multifunctional centers. Each department is engaged in its own formation of a system for the services provision.

The Singaporean government has a strong focus on public service delivery, and has invested heavily in developing high-quality public services in areas such as healthcare, education, and transportation. This emphasis on public service delivery began in the 1960s, when the country gained independence and faced significant challenges such as a lack of resources and infrastructure. The government responded by developing a strong public service sector, with a focus on efficiency and innovation. Thus, in 1980, the Government of Singapore adopted the Program computerization of civil services, designed for 20 years. In accordance with it, all administrative services were equipped with computers, and officials were trained in high-tech methods of work.

E.A. Pekhtereva states that in the 1990s, many important decisions and programs of action were taken in Singapore that contributed to the construction of a system of electronic public services. As a result, in 1990, the State Commission for Standardization was established. As a result of which, 10 years later, the "one window" system was launched.

In 1998, the law on electronic transactions was passed. It gave legal significance and security to e-commerce, and then to the use of payment systems for working with government agencies. The Singapore Government has established the necessary legal and regulatory framework for e-commerce. It included authentication, intellectual property protection, contract drafting, dispute resolution and privacy. The legal status of electronic contracts and digital signatures was defined by the Law. Guthrie I.S identifies five strategic goals for the development of e-government in Singapore [9]:

1. To arrange work in digital format;

2. To deliver public services to the consumer in electronic form;
3. To be proactive and responsive to citizens;
4. To use ICT to open up new opportunities for interaction with society and its individual members;
5. To be innovative (with the help of ICT).

In June 2011, the eGov 2015 Program was officially launched in Singapore. It was designed to continue and develop previously implemented projects in the field of building e-government. The state strategy covers the use of all electronic types of services, meaning that public services can be provided through the Internet, mobile communications, digital television and call centers.

In *South Korea*, public service delivery has developed rapidly since the 1960s, when the country began a period of rapid economic growth and modernization. The government has invested heavily in developing public services in areas such as healthcare, education, and transportation, and has introduced several reforms to improve the efficiency and effectiveness of public service delivery. For example, in 1999, the government introduced the Basic Plan for E-Government, which aimed to improve the accessibility and quality of government services through digital platforms. At the initial stage, such services as customs, tax inspection, patent service were covered by the digitalization process. The subsystem of "electronic government" was formed, as well as the notification service through mobile applications was introduced at that time [10].

The full digitalization of public services in Korea began in 2001, it was directly related to the expansion of the list of public services and the transformation of various work processes. The result of this stage was: the multispectrum of the services provided, both for citizens and for business; noticeable dynamics of transportability, accessibility of service management, a high level of interactivity between various systems and a subsystem involved in the provision of public services.

E-government is focused on the individual, his needs, due to open access to information that provides an interactive dialogue with the state, its readiness to anticipate and satisfy the needs of the service recipient.

The integration of all digital systems and their components was carried out from 2008 to 2012, this was done in order to ensure maximum comfort, accessibility and reliability of public services. To give a simple example, servicereceive orders a service to receive benefits. All that is needed for this is to submit an application, after this procedure (submitting an application) it goes to a certain department, where it is recorded by an employee of the department, where he automatically gets access to all information about the client (income, benefits, fines, etc.). Such integrated information contributes to the correct decision-making on the refusal or issuance of state benefits. This is just a small example that illustrates the procedure for providing public services in Korea [10]. Currently, both individuals and legal entities can receive any public service using a mobile device.

In Korea, since 2013, the strategy of "smart government" has been popularized. The eGovernment portal unites various administrative institutions. Public services conduct training seminars on the provision of public services, sometimes such meetings are interactive and are conducted in the form of surveys [11].

As for the *French* model of providing public services, it has similar features with other European models. In particular, in 1992, a program for the standardization of public services "La Charte des Services Publies" was developed. It was based on the following principles: transparency; involvement of the public in all stages of standards development; simplification of procedures and liability; trust and reliability[12].

L.T. Zhanuzakova, I.U. Aubakirova note that the French government authorities focus on such a parameter of the quality of services as efficiency. Achieving this became possible in the case of automation and informatization of public services. The priority direction is the provision of services to citizens using the Internet. E-government in France is an e-service, in other words, the protection of information and the provision of services through electronic technology. To receive the necessary services for citizens and businesses, special websites of the Parliament and the Senate were created. To help the population in the legal field, the Legifrance system was created [13]. The service-public.fr provides citizens and businesses with one-stop access to e-government information and services that are mapped to life events. A second

generation portal called mon.service-public.fr. is a user-configurable and highly secure single point of access to all public online services, some of which are fully transactional. The personal account allows users to track and know the status of all their interactions with public authorities.

According to the 2008 United Nations Worldwide e-Government Survey, the French Prime Minister's website is the best of its kind in Western Europe. It is because the website has a strong e-participation presence and features for online consultation, has a separate e-government portal and set a time frame for responding to citizen inquiries and emails."

Other noteworthy achievements include:

- A tax portal that allows you to file income declarations for individuals and legal entities, as well as pay taxes online;
- Vitale social security electronic card, winner of ePractice Good Practice Label 2007;
- The possibility of online notification of a change of address to several government agencies at once;
- An open data portal called data.gouv.fr, as of December 2011. It allows public services to publish their own data;
- Interdepartmental Government Network (RIE), a common network through which data is exchanged within each ministry and between ministries;
- France Connect single sign-on solution, launched in June 2016. It provides users (10 million users by the end of 2018) with an identification mechanism recognized by all digital government services available in France. It also allows the country to implement the European regulation eIDAS (Electronic Identification and Signature) ;
- Simplification Portal, launched on March 1, 2018. It is aimed at simplifying public services by allowing public administrations to create their own online forms.

The institution of public services in *Germany* has a long history. Since the beginning of the 1990s, 43 community service centers have been opened in Berlin alone, providing various municipal services to citizens. Today, public service centers are common in large cities and regional administrative centers [14]. Germany's current e-government strategy is outlined in the e-government 2.0 program. This program is part of a broader strategic approach outlined in the future-oriented document: innovations in governance, concerning the overall modernization of public administration. The e-government 2.0 program defines the following four areas of action:

1. *Portfolio*: Demand-driven expansion of federal government e-government services in terms of quality and quantity.
2. *Technological chains*: electronic cooperation between enterprises and public administrations through a collaborative technological chain.
3. *Identification*: the introduction of the electronic identity card and the development of eID concepts.
4. *Communication*: A secure communication infrastructure for citizens, businesses and administrations.

Registration of small and medium-sized businesses is carried out according to a simplified procedure, giving the priority to the use of IT. Information technology costs amount to 20 million euros per year. German researchers believe that the informatization of public services will allow: to include the public sector in the digital ecosystem; the state and citizens will master new forms of network cooperation; innovative changes in the digital environment; openness and trust [15].

The first country in the world to start lobbying for the problem of open access to information on public services was *Canada*, which launched the e-government project. In 1994, the "Project for the provision of services by government agencies using information technology" was prepared, which currently has the international trend name "e-government" [16].

For more than ten years, Canada has implemented a project of the "one window" system at the state level. Back in the 90s, Canada began to develop the concept of a service state. When the Services Canada

project was launched in September 2005, the following principles were defined for the stasis: internationalization; multi-channel access to services; customer focus. The project is supervised directly by the Minister of Human Resources and Social Development. Each client can choose any way to receive the service: come personally to the service center, contact by phone or receive services through telecommunication channels, in particular the Internet [17].

All public services in *Finland* can be accessed on the Suomi.fi portal. The site has the ability to communicate with government agencies through feedback forms, as well as complete information about the state and municipalities, job search, jobs, working life rules, unemployment benefits and pensions. The quality of public services is achieved through the implementation of automation and informatization tools, which made it possible to see some results: a tradition of open government and transparency of the public sector has been formed; citizens use existing e-government services; the current e-government is efficient and effective; the public and private sectors ensure the connection of the population to digital services and the operation of a digital signature [18].

After the collapse of the Soviet Union in 1991, *Russia* began a period of transition towards a market economy and a democratic political system. This period was marked by significant changes in the provision of public services, as the government sought to decentralize service delivery and introduce market-based reforms. In the 1990s, the government introduced a range of reforms to improve the efficiency and effectiveness of public service delivery, such as the introduction of voucher schemes for healthcare and education, and the establishment of new social welfare programs.

However, these reforms were often implemented unevenly, and the quality of public services continued to vary widely across the country. The 2000s saw a renewed focus on improving public service delivery, with the introduction of new programs such as the National Priority Projects and the modernization of healthcare and education systems.

Multifunctional public service centers were opened in 2011 in *Russia*. Currently, from the point of view of S.N. Kostina, G.A. Bannykh, L.I. Voronina, the main directions for improving the quality of public services are: optimization and streamlining of administrative procedures; elimination of redundant administrative procedures; optimization of the documents provided for obtaining public services; unification and optimization of procedures and workflow, eliminating the need to re-request information; increasing the level of responsibility of local performers providing public services [19].

The first references that pointed out the need for regulation of public services are contained in a number of regulatory Decrees of the Russian Federation, as well as in the Concept of Administrative Reform for 2006-2010. The first regulations for public services of Russia were developed in 2010. Already in 2016, there were developed technological schemes for the provision of public services, which are a detailed explanation of the requirements, conditions and content of the process of providing public services [20].

Here's a table summarizing the legal framework for the provision of public services and electronic government services in England, USA, Singapore, Republic of Korea, France, Germany, Canada, Finland and Russia:

Country	Legal Framework for Public Services	Electronic Government Services
Finland	Public Sector Act, Local Government Act, Electronic Services Act	Suomi.fi, e-services portal, Kanta services, MyTax, MyBenefits

Russia	Constitution, Federal Law on Electronic Signatures, Law on State and Municipal Services	Gosuslugi, EPGU, EHEALTH, E-School
England	Localism Act, Freedom of Information Act, Digital Economy Act	GOV.UK, HMRC online services, NHS Digital services, mySociety
USA	Privacy Act, E-Government Act, Freedom of Information Act	USA.gov, eServices, HealthIT.gov, Data.gov
Singapore	Public Sector Governance Act, Electronic Transactions Act, Personal Data Protection Act	SingPass, MyInfo, eCitizen, CorpPass
Republic of Korea	Act on Promotion of Information and Communications Network Utilization and Information Protection, Personal Information Protection Act	Korea Online E-Procurement System, National Information Society Agency services, MOLIT e-services
France	Act on Digital Republic, Law on Administrative Simplification, Personal Data Protection Act	FranceConnect, Impots.gouv.fr, Service-public.fr, Ameli.fr
Germany	Administrative Procedures Act, E-Government Act, Data Protection Act	Serviceportal.Bund.de, Elster, Kfz-Zulassung
Canada	Access to Information Act, Privacy Act, Digital Privacy Act	Canada.ca, MyCRA, My Service Canada Account, PHAC online services

Table 3 the legal framework for the provision of public services and electronic government services in mentioned countries

Note: Compiled by the author

As you can mention from the table 3, there are different Acts and other legal documents in these countries, and there may be additional laws and regulations that apply to the provision of public services and electronic government services in these countries, but those which are mentioned in the table 3 are the main ones.

Based on the comparison of public services in England, USA, Singapore, Republic of Korea, France, Germany, Canada, Finland, and Russia it is clear that each country has its own unique approach to providing public services to citizens. However, some common themes emerge:

- Digitalization: Most of the countries have made significant investments in digitalizing their public services, with a range of e-government services available to citizens and businesses.
- Emphasis on efficiency and accessibility: There is a strong emphasis on making public services more efficient and accessible to citizens, with a range of digital channels available for accessing services.
- Legal frameworks: Each country has a legal framework in place to govern the provision of public services and e-government services, with specific laws and regulations that apply to the sector.

Overall, it is clear that there is a growing trend towards digitalization and leveraging technology to improve the efficiency and accessibility of public services across the globe. While each country has its own unique approach, there is much to be learned from the successes and challenges faced by other countries in this field.

Conclusion

The development of e-government is a unique opportunity for the economic development of the country. Building an information society is an important condition that stimulates the growth of the competitiveness of the economy, the integration of various states, as well as the implementation of a coordinated international policy, the development of a growing unused labor force and the development of many other areas of public life. Most social and economic problems are solved with the help of information technology. The technological revolution is not enough to ensure socio-economic progress in the era of globalization, therefore, close international cooperation, legal norms that promote the free exchange of goods and services are necessary. What is needed, first of all, is the involvement of human capital in public administration to bring about changes. One of the main problems is the lack of data exchange standards. England and the USA are intensively implementing standardization-related activities aimed at system cooperation, openness of the market, products and services, increasing the level of information security, as well as public confidence in electronic services. The key to this is the fight against digital and IT alienation of society. In the US, 76% of the total population has access to the Internet. Long after the creation of e-government, it will be duplicated by the usual offline structures of interaction with citizens. There are entire sectors of society that either never, or only in the distant future, will be able to start using government services via the Internet. First of all, these are people of the older generations, who are generally poorly receptive to technological upgrades. In Europe, in this regard, even the specific term digital divide appeared, meaning the division of society on the basis of its access to modern information technologies. The problem of digital inequality worries Western societies even more than the possibility of using information technology for "non-democratic" purposes.

To study foreign experience in the provision of public services, an analysis of the ratings of foreign countries was carried out, according to the results of which such countries as the USA, Great Britain, Germany, France, Singapore, Finland, Russia, Canada, and the Republic of Korea were selected.

As shown by the analysis in nine countries with established legal regulation and historical traditions in the field of public services, the issues of managing public services in them are a logical continuation of the development of law. In European countries (Great Britain, Germany, France, Finland), the legislative base in the field of state administration is quite clearly built. services and information management. Russian legal system in the field of state. services are still in development.

An analysis of public services in these states shows a trend towards greater specification of the legal regime, including those included in information systems, including issues of their reuse. Along with the development of the legal regime of public data, the legal regime of personal data is also being specified, including the protection of personal information.

However, the governments of the analyzed countries should take measures to increase the digital literacy of society and take steps to reduce the cost of the Internet and free access to it. The expansion of individual/personalized services for certain categories of users should also be recommended.

Based on the results of the study, the following further studies on e-government implementation can be proposed, examining public services in a larger sample to assess the potential development and impact.

References

1. Шарков А.В. Социальная функция государства в древнем мире [Электронный ресурс] -URL: <https://cyberleninka.ru/article/n/sotsialnaya-funktsiya-gosudarstva-v-drevnem-mire-na-materiale-kitaya/viewer> (дата обращения: 14.09.2021)

2. Зайнашева З.Г., Габидулина Э.В., Смильгина К.Л. Зарубежный опыт повышения качества и доступности предоставления государственных услуг [Электронный ресурс] - URL: <https://cyberleninka.ru/article/n/zarubezhnyy-opyt-povysheniya-kachestva-i-dostupnosti-predostavleniya-gosudarstvennyh-uslug/viewer> (дата обращения: 23.09.2021)
3. Жетписбаева М.К., Миронычева А.И. Зарубежный опыт совершенствования системы предоставления государственных услуг // Международный студенческий научный вестник. – 2017. – № 6.; [Электронный ресурс] - URL: <http://eduherald.ru/ru/article/view?id=17893> (дата обращения: 25.09.2021)
4. Иванова А.А. Оказание государственных услуг населению: проблемы и перспективы [Электронный ресурс] - URL: <https://cyberleninka.ru/article/n/okazanie-gosudarstvennyh-uslug-naseleniyu-problemy-i-perspektivy/viewer> (дата обращения: 25.09.2021)
5. Миневрин И.Г. Эволюция электронного правительства в США [Электронный ресурс] - URL: <https://cyberleninka.ru/article/n/evolyutsiya-elektronnogo-pravitelstva-v-ssha/viewer> (дата обращения: 25.09.2021)
6. А.Баркин, В.Дрожжинов, Ю.Травкин Совместное использование людских ресурсов [Электронный ресурс] - URL: <https://www.itweek.ru/themes/detail.php?ID=64812> (дата обращения: 26.09.2021)
7. Попова М. Электронное правительство: американская модель для сборки [Электронный ресурс] - URL: <https://telecom.cnews.ru/reviews/free/gov/part7/us.shtml> (дата обращения: 26.09.2021)
8. Пехтерев Е.А. Электронное правительство Сингапура [Электронный и ресурс] - URL: <https://cyberleninka.ru/article/n/elektronnoe-pravitelstvo-singapura> (дата обращения: 26.09.2021)
9. Гутри И.С. Основные стратегии формирования электронного правительства // Технологии информационного общества – Интернет и современное общество: Труды VI Всероссийской объединенной конференции (3-6 ноября 2006 г., г. Санкт-Петербург). – СПб.: Изд-во Филологического ф-та СПбГУ, 2003. – с.118-120.
10. Белова Л.Г. Южная Корея: движение от информационного общества к вездесущему обществу [Электронный ресурс] - URL: <https://cyberleninka.ru/article/n/yuzhnaya-koreya-dvizhenie-ot-informatsionnogo-obschestva-k-vezdesuschemu-obschestvu/viewer> (дата обращения: 26.09.2021)
11. Пироварова О.В. Международный опыт оценки эффективности государственного управления [Электронный ресурс] - URL: <https://cyberleninka.ru/article/n/mezhdunarodnyy-opyt-otsenki-effektivnosti-gosudarstvennogo-upravleniya> (дата обращения: 26.09.2021)
12. Кайль Я.Я. Зарубежный опыт внедрения стандартизации государственных и муниципальных услуг [Электронный ресурс] - URL: <https://cyberleninka.ru/article/n/zarubezhnyy-opyt-vnedreniya-standartizatsii-gosudarstvennyh-i-munitsipalnyh-uslug/viewer> (дата обращения: 26.09.2021)
13. Жанузакова Л.Т., Аубакирова И.У. Правовое обеспечение государственных услуг в Республике Казахстан и европейских странах: сравнительный опыт [Электронный ресурс] - URL: <https://cyberleninka.ru/article/n/pravovoe-obespechenie-gosudarstvennyh-uslug-v-respublike-kazahstan-i-evropeyskih-stranah-sravnitelnyy-opyt> (дата обращения: 26.09.2021)
14. Nationale E-Government-Strategie [Электронный ресурс] - URL: <https://www.yumpu.com/en/document/read/5353299/national-e-government-strategy-it-planungsrat> (дата обращения: 28.09.2021)
15. Андреева Г.Н. Электронное правительство в Германии: организация, цифровая трансформация и правовое регулирование [Электронный ресурс] - URL: <https://cyberleninka.ru/article/n/elektronnoe-pravitelstvo-v-germanii-organizatsiya-tsfirovaya-transformatsiya-i-pravovoe-regulirovanie> (дата обращения: 28.09.2021)
16. Лопухов Н.В., Сулова Д. Комплексная обучающая информационная система "электронный муниципалитет" как инновационная технология внедрения концепции "электронного правительства" в органах государственной власти [Электронный ресурс] - URL: <https://www.elibrary.ru/item.asp?id=17342483> (дата обращения: 28.09.2021)

17. Макнат Кэтлин Виртуальное государство Канады [Электронный ресурс] - URL: <https://cyberleninka.ru/article/n/virtualnoe-gosudarstvo-kanady> (дата обращения: 28.09.2021)
18. Кристальный Б.В. ,Травкин И.В. Электронное правительство: опыт Финляндии. // Под редакцией В.И. Дрожжинова. – М.: Эко-Трендз, 2003. -203-247с.
19. Костина С. Н. , Банных Г. А. , Воронина Л. И. [под общ. ред. Костиной С. Н.] Организация предоставления государственных и муниципальных услуг //Мво науки и высш. образования Рос. Федерации, Урал. федер. ун-т. — Екатеринбург : Издво Урал. унта, 2019. — с.123
20. Терехова А.Н. Оценка качества предоставляемых государственных (муниципальных) услуг [Электронный ресурс] - URL: <https://cyberleninka.ru/article/n/otsenka-kachestva-predostavlyaemyh-gosudarstvennyh-munitsipalnyh-uslug> (дата обращения: 02.10.2021)
21. Рейтинг ООН по развитию электронного правительства [Электронный ресурс] - URL: [https://publicadministration.un.org/egovkb/Portals/egovkb/Documents/un/2020-Survey/2020%20UN%20E-Government%20Survey%20\(Full%20Report\).pdf](https://publicadministration.un.org/egovkb/Portals/egovkb/Documents/un/2020-Survey/2020%20UN%20E-Government%20Survey%20(Full%20Report).pdf) (дата обращения: 06.10.2021)

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Әлемнің әртүрлі елдеріндегі мемлекеттік қызметтер: салыстырмалы талдау

Аннотация. Бұл зерттеудің мақсаты әлемнің әртүрлі елдеріндегі (атап айтқанда: Ұлыбритания, АҚШ, Сингапур, Оңтүстік Корея, Франция, Германия, Канада, Финляндия, Ресей) мемлекеттік қызметтерді зерттеу және салыстырмалы талдау болып табылады. Бұл мақалада біз салыстырмалы талдау әдісімен зерттелген әлемнің тоғыз еліндегі мемлекеттік қызметтердің жай-күйін зерттедік. Салыстырмалы зерттеуде біз Біріккен Ұлттар Ұйымының 2020 жылғы екіжылдық шолуларын, есептерін, ережелерін, статистикасын қолдандық. Біз анықтаған елдердегі мемлекеттік қызметтердің жай-күйін зерделеу үшін талдау үшін келесі критерийлерді қолдандық: тарихи аспект, электрондық қызметтер, құқықтық нормалар, жүйелердегі қызметтер. Біз әрбір ел үшін мемлекеттік қызметтер мен электрондық үкіметтерді құрудың тарихи процесін талдап, түсіндірдік; әрбір ел үшін электронды үкіметтің тарихи дамуы түсіндірілді; талданатын елдердегі құқықтық механизмдер анықталды. Мақаланың қорытынды бөлімінде зерттелетін елдердегі мемлекеттік қызметтерді жақсарту бойынша кейбір ұсыныстар мен ұсынымдар берілген.

Түйін сөздер: мемлекеттік қызметтер, мемлекеттік қызметтердің сапасы, сапаны басқару, салыстырмалы талдау, мемлекеттік қызметтердің сапа үлгілері.

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Государственные услуги в различных странах мира: сравнительный анализ

Аннотация. Целью данного исследования является изучение и сравнительный анализ государственных услуг в различных странах мира (в частности: Великобритания, США, Сингапур, Южная Корея, Франция, Германия, Канада, Финляндия, Россия). В данной статье нами исследованы состояние государственных услуг в девяти странах мира, которое было изучено методом сравнительного анализа. В ходе сравнительного исследования мы использовали Обзоры Организации Объединенных Наций 2020 года, которые проводятся раз в два года, отчеты, нормативно-правовые акты, статистические данные. Для исследования состояния государственных услуг в обозначенных нами странах мы использовали следующие критерии для анализа: исторический аспект, электронные услуги, правовые нормы, услуги в системах. Нами был

проанализирован и интерпретирован исторический процесс создания гос. услуг и электронных правительств для каждой страны; были объяснены исторические события электронного правительства для каждой страны; определены правовые механизмы в анализированных странах. В заключительной части статьи представлены некоторые предложения и рекомендации по улучшению гос. услуг в исследуемых странах.

Ключевые слова: государственные услуги, качество государственных услуг, управление качеством, сравнительный анализ, модели качества государственных услуг.

References

1. SHarkov A.V. Social'naya funkciya gosudarstva v drevnem mire [The social function of the state in the ancient world] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/sotsialnaya-funktsiya-gosudarstva-v-drevnem-mire-na-materiale-kitaya/viewer> (Accessed: 14.09.2021)
2. Zajnasheva Z.G., Gabidullina E.V., Smil'gina K.L. Zarubezhnyj opyt povysheniya kachestva i dostupnosti predostavleniya gosudarstvennyh uslug [Foreign experience in improving the quality and availability of public services] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/zarubezhnyy-opyt-povysheniya-kachestva-i-dostupnosti-predostavleniya-gosudarstvennyh-uslug/viewer> (Accessed: 23.09.2021)
3. ZHetpisbaeva M.K., Mironycheva A.I. Zarubezhnyj opyt sovershenstvovaniya sistemy predostavleniya gosudarstvennyh uslug // Mezhdunarodnyj studencheskij nauchnyj vestnik. – 2017. – № 6. [Foreign experience in improving the system of providing public services] [Electronic resource]. Available at: <http://eduherald.ru/ru/article/view?id=17893> (Accessed: 25.09.2021)
4. Ivanova A.A. Okazanie gosudarstvennyh uslug naseleniyu: problemy i perspektivy [Provision of public services to the population: problems and prospects] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/okazanie-gosudarstvennyh-uslug-naseleniyu-problemy-i-perspektivy/viewer> (Accessed: 25.09.2021)
5. Minevrin I.G. Evolyuciya elektronogo pravitel'stva v SSHA [Evolution of e-government in the USA] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/evolyutsiya-elektronogo-pravitel'stva-v-ssha/viewer> (Accessed: 25.09.2021)
6. A.Barkin, V.Drozhzhinov, YU.Travkin Sovmestnoe ispol'zovanie lyudskih resursov [Sharing human resources] [Electronic resource]. Available at: <https://www.itweek.ru/themes/detail.php?ID=64812> (Accessed: 26.09.2021)
7. Popova M. Elektronnoe pravitel'stvo: amerikanskaya model' dlya sborki [E-government: American Build Model] [Electronic resource]. Available at: <https://telecom.cnews.ru/reviews/free/gov/part7/us.shtml> (Accessed: 26.09.2021)
8. Pekhterev E.A. Elektronnoe pravitel'stvo Singapura [Electronic government of Singapore] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/elektronnoe-pravitel'stvo-singapura> (Accessed: 26.09.2021)
9. Gutri I.S. Osnovnye strategii formirovaniya elektronogo pravitel'stva: materialy dokladov VI Vserossijskoj ob"edinennoj konferencii, Sankt-Peterburg: Tekhnologii informacionnogo obshchestva – Internet i sovremennoe obshchestvo [Basic strategies for the formation of electronic government: materials of reports of the VI All-Russian United Conference, St. Petersburg: Technologies of the information society - the Internet and modern society] 118-120 (2003) [in Russian]
10. Belova L.G. YUzhnaya Koreya: dvizhenie ot informacionnogo obshchestva k vezdesushchemu obshchestvu [South Korea: Moving from an Information Society to an Omnipresent Society] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/yuzhnaya-koreya-dvizhenie-ot-informatsionnogo-obshchestva-k-vezdesushchemu-obshchestvu/viewer> (Accessed: 26.09.2021)
11. Pirovarova O.V. Mezhdunarodnyj opyt ocenki effektivnosti gosudarstvennogo upravleniya

- [International experience in assessing the effectiveness of public administration] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/mezhdunarodnyy-opyt-otsenki-effektivnosti-gosudarstvennogo-upravleniya> (Accessed: 26.09.2021)
12. Kaji' YA.YA. Zarubezhnyy opyt vnedreniya standartizatsii gosudarstvennyh i municipal'nyh uslug [Foreign experience in the implementation of standardization of state and municipal services] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/zarubezhnyy-opyt-vnedreniya-standartizatsii-gosudarstvennyh-i-munitsipalnyh-uslug/viewer> (Accessed: 26.09.2021)
13. ZHanuzakova L.T., Aubakirova I.U. Pravovoe obespechenie gosudarstvennyh uslug v Respublike Kazahstan i evropejskih stranah:sravnitel'nyy opyt [Legal support of public services in the Republic of Kazakhstan and European countries: comparative experience] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/pravovoe-obespechenie-gosudarstvennyh-uslug-v-respublike-kazahstan-i-evropeyskih-stranah-sravnitelnyy-opyt> (Accessed: 26.09.2021)
14. Nacional'naya strategiya elektronnoogo pravitel'stva – 2010. [National e-government strategy] [Electronic resource]. Available at: <https://www.yumpu.com/en/document/read/5353299/national-e-government-strategy-it-planungsrat> (Accessed: 28.09.2021)
15. Andreeva G.N.Elektronnoe pravitel'stvo v Germanii: organizatsiya, cifrovaya transformatsiya i pravovoe regulirovanie [E-government in Germany: organization, digital transformation and regulation] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/elektronnoe-pravitel'stvo-v-germanii-organizatsiya-tsifrovaya-transformatsiya-i-pravovoe-regulirovanie> (Accessed: 28.09.2021)
16. Lopuhov N.V. , Suslova D. Kompleksnaya obuchayushchaya informacionnaya sistema "elektronnyy municipalitet" kak innovatsionnaya tekhnologiya vnedreniya koncepcii "elektronnoogo pravitel'stva" v organah gosudarstvennoj vlasti [Integrated educational information system "electronic municipality" as an innovative technology for the implementation of the concept of "electronic government" in public authorities] [Electronic resource]. Available at: <https://www.elibrary.ru/item.asp?id=17342483> (Accessed: 28.09.2021)
17. Maknat Ketlin Virtual'noe gosudarstvo Kanady [Virtual State of Canada] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/virtualnoe-gosudarstvo-kanady> (Accessed: 28.09.2021)
18. Kristal'nyy B.V. ,Travkin I.V. Elektronnoe pravitel'stvo: opyt Finlyandii. M.Eko-Trendz.-s.203-247 . [E-government: the experience of Finland. M. Eco-Trendz.-p.203-247] [in Russian]
19. Kostina S.N., Bannyh G.A., Voronina L.I. [pod obshch. red. S. N. Kostinoj] Organizatsiya predostavleniya gosudarstvennyh i municipal'nyh uslug ; Mvo nauki i vyssh. obrazovaniya Ros. Federacii, Ural. feder. un-t. — Ekaterinburg : Izdvo Ural. unta, 2019. — s.123 [Organization of the provision of state and municipal services Ministry of Science and higher. education Russian Federation, Ural. Feder. un-t. - Yekaterinburg: Ural Publishing House. unta, 2019. -- p. 123] [in Russian]
20. Terekhova A.N. Ocenka kachestva predostavlyaemyh gosudarstvennyh (municipal'nyh) uslug [Assessment of the quality of provided state (municipal) services] [Electronic resource]. Available at: <https://cyberleninka.ru/article/n/otsenka-kachestva-predostavlyaemyh-gosudarstvennyh-munitsipalnyh-uslug> (Accessed: 02.10.2021)
21. Rejting OON po razvitiyu elektronnoogo pravitel'stva- 2020.[UN rating on the development of e-government - 2020.] [Electronic resource]. Available at: [https://publicadministration.un.org/egovkb/Portals/egovkb/Documents/un/2020-Survey/2020%20UN%20E-Government%20Survey%20\(Full%20Report\).pdf](https://publicadministration.un.org/egovkb/Portals/egovkb/Documents/un/2020-Survey/2020%20UN%20E-Government%20Survey%20(Full%20Report).pdf) (Accessed: 06.10.2021)

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