

NATIONAL OBSERVATORY

Digital Sovereignty in the Italian Public Administration

Measuring, raising awareness, driving change — June 2025

What the Observatory is

- Independent civic monitoring project on digital sovereignty in the Italian Public Administration
- Measures the dependence of public bodies on foreign digital infrastructure
- Starts with email: the most widespread and most sensitive communication channel
- Open data, replicable methodology, open source code (CC BY-SA 4.0)

The problem: jurisdictional dependence

Why it is a problem

- Institutional emails contain citizens' personal data (art. 4 GDPR)
- Many bodies use providers subject to non-EU jurisdiction
- The US CLOUD Act allows access to data even if the servers are in Europe
- Structural conflict with the GDPR and the Schrems I and II rulings

The numbers (being updated)

~23,000

PA bodies monitored

—%

on non-EU providers

—%

on Italian providers

—%

on EU providers

Values being updated — source: MxMap.it on IndicePA

How we measure it

The methodology in 4 steps

- 1. Extraction of bodies and domains from IndicePA (CKAN JSON API)
- 2. Resolution of MX (Mail Exchange) records via DNS
- 3. Identification of the provider and its jurisdiction
- 4. Sovereignty classification: Italian / EU / Non-EU

The risks

Four dimensions of risk

- Jurisdictional — access to data by non-EU authorities
- Data protection — GDPR non-compliance on transfers
- Operational continuity — dependence on unilateral foreign decisions
- Strategic and economic — lock-in and lack of development of the EU industry

Who the Observatory is for

Civic monitoring at everyone's service

- Policymakers — data for parliamentary questions and legislative proposals
- Regulators (AgID, ACN, Garante) — basis for guidelines and measures
- PA executives — benchmarking and support for migration choices
- Journalists, researchers, citizens — transparency and awareness
- IT providers and Consip — market and procurement opportunities

What we propose

Five recommendations

- Mandatory census of providers in the PA (transparency)
- Sovereignty requirements in Consip framework agreements
- National migration plan with dedicated funding
- Continuous and public monitoring over time
- Promotion of the model at European level

The Observatory's documents

- Policy Brief — for policymakers (2 pages)
- Technical Brief — for AgID, ACN, Garante (6 pages)
- Business Case — for IT providers and Consip
- EU Briefing — for the European institutions (English)
- All downloadable from the site, under CC BY-SA 4.0 licence

Next steps

- Publication of the report with updated data
- Presentation of the findings to the Chamber of Deputies
- Integration of live KPIs from MxMap.it, updated daily
- Extension of monitoring to other digital PA services

GET INVOLVED

Change starts with awareness

[osservatorio-nazionale-sovranita-digitale](#) • [mxmap.it](#) • [Telegram](#)