

SMEUnited position paper on the Commission's consultation on a set of European Digital Principles

Introduction

SMEUnited welcomes the opportunity to comment on the Commission's consultation "on a set of European Digital Principles". We believe that digital transformation, which is a key enabling factor for SMEs to grow, needs to be coupled with sound digital principles. European digital principles should create the necessary confidence in businesses and citizens while navigating the digital environment.

1. Digital Principles

1.1 Universal access to internet services

SMEUnited believes that everyone should have access to the internet through an affordable and adequate connection. Everyone should be able to access and distribute internet content and services without discrimination. Everyone should be clearly informed on the terms and conditions applicable to connectivity services available on the market, and benefit from a high level of protection when using them.

1.2 Universal digital education and skills for people to take an active part in society and in democratic processes

In SMEUnited's view everyone should have the possibility to have access to high-quality and inclusive digital education (infrastructure, connectivity, equipment, content and pedagogical practices). Everyone should have the possibility to acquire through education and training the necessary digital skills to take an active part in society, labour markets and in democratic processes. Everyone should receive safeguards for a healthy balance in their use of digital technologies for working and learning. Everyone should be able to be empowered through education to navigate the digital (media) environment in a safe, critical and confident manner. An (basic) understanding of technologies, such as Artificial Intelligence should be promoted, so that it is possible to engage critically and ethically with them in everyday life.

1.3 Accessible and human-centric digital public services and administration

It is important that everyone, including the most vulnerable and with disability or at risk of exclusion, should benefit from human-centric and accessible digital public services at all levels. However, access to such services should not be solely digital and should include the possibility of non-digital support - at least by telephone - for those who are not at ease with digital tools.

Every person should have the possibility to engage in the creation and improvement of digital public services that are tailored to their needs, preferences. In line with the only once principle, and with respect for the GDPR every person should submit their data or information only once when they are digitally interacting with public administrations across the European Union.

Digital services offered by the public sector such as digital identity solutions should be interoperable and allow data portability across the EU.

Digital technologies and solutions should enable a wide-ranging engagement of and with people and stimulate the development of participatory initiatives at all levels. Digital technologies and solutions should contribute to better levels of public security and safety.

1.4 Access to digital health services

Everyone should have access to the full benefits of digitisation of health and care services, including personalised medicine, telemedicine and personalised health services. Digital health and care services should be inclusive, accessible, equitable, secure and designed to meet peoples' needs. Moreover, everyone should have secure, digital access to their electronic health records. Opportunities to promote health and better health care for European citizens should be pursued, based on shared European core values of solidarity and privacy. Everyone should be able to rely on the protection of personal health data.

We therefore welcome the establishment of a common European Health Data Spaces (EHDS), as envisaged in the data strategy of the EU Commission.

From our industry perspective, we need to build upon public trust. Protection of personal health data is key.

1.5 An open, secure and trusted online environment

Everyone should be able to enjoy an open and transparent online environment, where a diversity of opinions is encouraged and protected.

Everyone should be able to enjoy a safe and trusted online environment, where illegal content and goods are effectively tackled, and should be protected against cybercrime and/or attacks.

Everyone providing their services online should expect fair dealing, including in their relationship with online platforms.

Everyone should benefit from confidentiality of their electronic communications (e.g. phone conversation, emails, etc.) and protection of information on their electronic devices.

Everyone – explicitly including end-users - has a certain responsibility in establishing a secure online environment. Users must be made aware how they can contribute to a secure online environment, for instance through public campaigns and provision of tools and guidelines.

1.6 Protecting and empowering children and young people in the online space

The online environment should foster children's and young people's well-being and their participation as digital citizens. Children and young people should be equipped with digital literacy and the necessary skills and competences to navigate safely and responsibly online from an early age and throughout their education and training. Every child should be protected from harmful and illegal content, including from child sexual abuse and exploitation.

1.7 A European digital identity

Everyone should have access to a secure and trustworthy digital identity that can be used anywhere in the EU to access a broad range of public and private online services. They should also be protected against identity theft, alteration or manipulation.

SMEUnited promotes a European digital identity of Internet users. Such an identity will add to build a secure environment. Not only B2G but also B2B. For a healthy and trustworthy environment the traders behind a platform should be identifiable.

1.8 Access to digital devices, systems and services that respect the climate and environment

Digital products and services should be produced, and used with the lowest possible environmental impact.

1.9 Ethical principles for human-centric algorithms

No one should be subject to algorithmic systems making use of subliminal techniques beyond a person's consciousness in order to materially distort their behaviour in a manner that causes or is likely to cause that person or another person physical or psychological harm.

No one should be subject to algorithmic systems that exploits any of the vulnerabilities of a specific group due to their age (such as children and elder people), physical or mental disability,

in order to materially distort the behaviour of a person pertaining to that group in a manner that causes or is likely to cause that person or another person physical or psychological harm.

Everyone should benefit from algorithmic public services systems that foster their individual and societal well-being.

2. Additional digital principles

SMEUnited believes that another relevant digital principle to be included in the above list is the freedom to set up and conduct business online ("freedom of digital enterprise").

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