



**Social Good Accelerator EU  
European Acceleration Movement Tech  
organizations of general interest**

**Position paper**

**Artificial Intelligence White Paper  
of the European Commission**

(in addition to the [Position Paper on the Data Strategy of May 2020](#))

**Paris-Brussels, June 2020**

The Data Strategy and the White Paper on Artificial Intelligence are the first pillars of the European Commission's new Digital Agenda 2021-2027. They both emphasise the need to give priority to people in the development of technology, as well as the need to defend and promote European values and rights in the way technology is designed, manufactured and deployed in the real economy.

The European Commission's White Paper on Artificial Intelligence (AI) aims to establish an AI ecosystem that will bring the benefits of technology to European society and economy as a whole: for citizens (improved public services); for businesses (new generation of products and services in areas where Europe has a lead); and in the area of services of public interest. This strategy paper postulates that the use of AI systems can play a considerable role in achieving sustainable development goals, and in supporting the democratic process and social rights.

The [Social Good Accelerator EU](#), a European association that advocates technological acceleration of general interest organisations, considers that these objectives must absolutely integrate the actors of the Social Economy and Civil society (SECS), recognised since 2011 by the European Commission as one of the levers of "intelligent, sustainable and inclusive growth". This sector with limited or no profit-making potential seeks to reconcile solidarity, economic performance and social utility, demonstrates a certain resilience in the face of crises - it has again demonstrated this during the COVID crisis 19 - and contributes greatly to mitigating their social effects. It brings together a wide range of economic sectors (10% of European GDP), and today provides a growing number of jobs in Europe (11M workers, i.e. 4.5% of the population and up to 11% in some countries). ¼ of the new organisations created each year, and even ⅓ in some countries, belong to this sector (source: ESF).

Our consultation highlighted that the current development of the European Commission's AI strategy overlooks the role and potential of civil society and Social Solidarity Economy actors in AI research and production. On reading the White Paper on AI, AI research seems indeed disconnected from civil society and SECS actors, and therefore from the target audiences of these organisations.

Moreover, in terms of the challenges of AI development, SECS faces the same challenges as SMEs/VSEs, with the addition of some specific challenges. In particular, SECS organisations benefit from less funding, due to their economic model (limited lucrativity or non lucrativity) and to the lack of a European legal framework on limited profit models and companies with a social mission; they need specific acculturation adapted to digital issues and finally they face an even greater challenge than VSE/SMEs in recruiting competent people on these issues.

On reading the White Paper on the European Commission's Artificial Intelligence strategy, we feel it is essential to recall the key role of Social Economy and European Civil Society organisations in defining the creation of economic, social and environmental value linked to the new data economy and its democratic governance. The development and adoption of AI must be inclusive: they must therefore be involved in the definition and production of devices in order to take full advantage of the opportunities that AI offers for society as a whole.

We are therefore developing several proposals, combined with those contained in [our previous position paper on the Data strategy](#).

## **I. CREATING A MULTI-DISCIPLINARY & MULTI-ACTOR ECOSYSTEM OF EXCELLENCE FOR ECONOMIC COMPETITIVENESS BUT ALSO TO ACCELERATE ENVIRONMENTAL AND SOCIETAL TRANSITION**

The excellence of this ecosystem should be considered in terms of economic as well as social and environmental performance, in the context of the [UN 2020 Sustainable Development Goals](#) and the [European approach to sustainable development](#).

### **I.A) Shared governance, focused on the human AND environmental factors**

The European bodies presiding over the definition of regulatory and investment strategies are still too business-oriented. Although ethics is a field that benefits from a broad expertise at the institutional level, societal and environmental uses as well as the unequal mechanisms linked to the production of AI are still too little taken into consideration. This can be explained in particular by the lack of diversity and multidisciplinary within the European Commission's [High Level Expert Group on Artificial Intelligence](#).

We therefore advocate **more diversity and multidisciplinary, including experts from Social Economy and civil society organisations, in the European Commission's advisory bodies on Artificial Intelligence and beyond on the digital economy**. This diversity and multidisciplinary are essential for the implementation of an AI strategy consistent with the Green Pact, an economy at the service of people and the new impetus for European democracy. The Social and Solidarity-based Economy and civil society today have real digital experts, representing alternative currents of thought and production methods, at the service of citizens, economic and digital inclusion, education and human rights. They must be consulted regularly on the main lines of the strategy "A Europe fit for the digital age".

### **I.B) An ambitious plan for initial and continuing training, off and online on AI giving Social Economy and Civil society organisations, whatever their status, the means to act, to invest in skills and to create cooperation for the general interest.**

The European Commission should redirect post-Covid budgets, notably in the framework of the Next Generation Eu plan, to finance a major programme of reconversion/reintegration into the artificial intelligence professions via SECS models, relying on job placement companies (Simplon.co, Samaforce, etc.) and multi-partner programmes such as Territoires Zéro chômeurs (France).

It would be highly desirable to be able to earmark specific envelopes dedicated to training courses adapted to the increase in the professional skills of SECS organisations, responding to the challenges of the sector (skills of product owners, IT managers, data scientists and analysts, but also the digital culture of social workers, etc.). The challenge is threefold: to preserve the economic and democratic role of SECS organisations but also to respond to the digital divide issues they address.

In this respect, the networks of Tiers-lieux, Fablabs and Makers and the integration enterprises through training and employment, which have demonstrated their capacity for citizen innovation during the Covid crisis, could act as operators. They are for many "not for profit" and belong de facto to the Social Economy and Civil society sector in Europe. This training

strand could also partly use "peer-to-peer" training in the form of Pro bono (free secondment of employee trainers from start-ups / large companies to SECS organisations, for example).

Popular education networks could also be encouraged to develop programmes that contribute to strengthening the education of children and young people in the areas of digital literacy, as well as digital mediation actors that contribute to increasing the skills of citizens and publics that are far from digital.

This employment support plan will also aim to integrate more diversity, equity and non-discrimination in AI production and machine learning. It will also allow for better recognition and appreciation of the human behind AI. Indeed, many AI systems actually involve large amounts of human labour, often hidden from the end users, with the corollary of a lack of transparency towards users and consumers of services, but also of a form of use of hidden and unrecognised labour.

**I.C) The establishment of a European model of clusters or European Data/IA cooperation poles dedicated to the general interest, integrating researchers in the human sciences and players in the Social and Solidarity-based Economy.**

Indeed, the Social and Solidarity-based Economy (including civil society) has many assets to develop AI centres of excellence in Europe.

- Knowledge of social needs to make AI more inclusive and real business models for inclusion through training and employment in the digital economy (MedNum and Aptic, Simplon.co (France), Bencode (Belgium), Waag (Netherlands), CDI Portugal ...
- SSE-specific "cluster" and cooperation models, which could inspire the digital economy (e.g. Territorial Economic Cooperation Poles (PTCE); large partnerships between training and integration companies and Tech companies such as that of Simplon.co and Microsoft)
- A real potential for the production and analysis of SECS metadata useful for ecological and societal transition, which is now largely underestimated and under-exploited.

A real partnership between research actors (STEM and Human Sciences) and Social Economy and Civil society organisations should be encouraged. In particular, applied research could be carried out in partnership on the issues of diversity of AI producers and AI biases in order to propose more inclusive and equitable AI models.

The design of AI specifically dedicated to social justice and solutions to the climate/biodiversity crisis should, in this context, be eligible for much larger funding envelopes.

**I.D) Standards and investment criteria that put people back at the centre of AI Production/Design and aim to accompany the social and environmental transition.**

A greater inclusion of Social Economy and Civil society organizations in political and public decisions on AI could allow for better arbitration in terms of investments in the "learning machine" while preserving human resources where they are indispensable for sovereignty, environmental preservation, equity and social justice.

<sup>1</sup> See the example cited by the EESC in its opinion INT/887 Artificial intelligence focusing on the human factor (annotation13): See for example 'A white-collar sweatshop': Google Assistant contractors allege wage theft', *The Guardian*, 29.5.2019 and 'Bot technology impressive, except when it's not the bot', *The New York Times (International Edition)*, 24.5.2019.

The inclusion of investment criteria on the hybridization of business models and public-business-EHS partnerships in particular is an avenue to be explored.

Beyond that, we propose that the Union adopt the framework of Sustainable Development Goals as a guideline for the future development of AI. We also advocate for the sustainable implementation of AI by the different organisations, including through good information and consultation practices.

**I.E) Finally, the Commission could launch a study on the opportunities of "non for profit" economic models with high social and environmental value, based on Data and AI for the actors of the Social Solidarity Economy.**

For example, in terms of digital taxation and innovation on public funding, we support the reflection on a European taxation on AI to better finance public services and private partners of general interest represented by social economy organisations.

Indeed, the fields related to intellectual and industrial property seem to open up new possible fields for taxation, beyond the simple taxation of profits: cultural and intellectual production by AIs seems to us to require a multidisciplinary field of experimentation and new opportunities for financing fields of social utility.

An open-source licensing model along the lines of the "Creative commons" licence could also be considered, to make available to civil society algorithms designed to speed up the ecological and societal transition.

Areas of cooperation between classical companies and SECS organisations also open up a number of opportunities for artificial intelligence and should be encouraged through public procurement, dedicated funding envelopes and greater political leverage (see [BMI-SBI Monitoring Report on Cooperation - EASME/DG Grow, European Commission](#)). They could, if encouraged, enable the scaling up of sovereign digital solutions with high social and environmental value such as [Reconnect, the Solidarity Cloud](#).

## II. CREATING A TRUSTED, FAIR & DEMOCRATIC ECOSYSTEM

Artificial intelligence (AI) is not an end in itself but a tool that can produce radical positive changes but also carries risks. This is why its use must be regulated.

Together with the experts we consulted, we thought about several proposals:

### **II.A) The establishment of regulations, definitions of "high-risk" areas and ethical standards relating to AI must be the subject of genuine democratic consultation.**

In this respect, the Social Economy and Civil society networks, as representatives of organisations of social utility and their beneficiaries, must be consulted. This is both to protect individual liberties and data, equal access, anticipation of bias, but also to guard against the risk of over-regulation which would be detrimental to small organisations, which are in the majority in the SSE. Indeed, the latter do not have the human, financial and technical means to ensure themselves, internally, the verifications on the conformity of their uses (see the impact of the RGPD): it is a question of auditing skills to be pooled.

### **II.B) The establishment of an independent public/private body, again diverse and multidisciplinary, which would rate algorithms and technologies on the basis of consumer-citizen feedback and testing (retro engineering) and propose a socially and environmentally responsible AI Label.**

This body could be created as a higher council (model of the Conseil national du numérique in France) or a European rating agency (on the Vigeo-Eiris model) on AI.

In terms of AI, a specific CSR evaluation and rating grid should be developed, for which this body representing the diversity of economic actors would be responsible. AI must integrate social and environmental responsibility "by design", and this body could be responsible for labeling/certification.

### **II.C) We support the proposals of the European EESC to create a 'European Company Certificate of Confidence for AI', but also to reaffirm the importance of transparency and social dialogue, in its opinion '[Building trust in human-oriented artificial intelligence](#)'.**

The transparency, traceability and explicability of algorithmic decision-making processes represent a challenge to which SECS organisations - and in particular those involved in social impact measurement, specialised integration companies, digital mediation and popular education actors - can contribute.

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## **The conditions of realization of this Position Paper**

The Social Good Accelerator has launched a tailored consultation initiative on the European Commission's two-pronged Data and AI strategies:

- **An online questionnaire**, available in French and English, received 22 responses from 4 European countries (Belgium, France, Sweden, Portugal). This public questionnaire was sent to our members and disseminated on our social networks to reach our entire European ecosystem.
- **Interviews with experts**: special thanks for their insights go to Jean-Gabriel Ganascia (President of the Ethics Committee of the CNRS, France), Julie Prost (Impala Avocats), Melissa Boudes and Christine Balagué (Good in Tech Chair, France), Denis Pansu (Fondation Internet Nouvelle Generation-FING), Denis Stokkink (Think Tank Pour la Solidarité, Belgium) and Paul Duan (NGO Bayes Impact).

## **Who are we? - Social Good Accelerator EU: European movement for the technical transition of general interest organisations**

The [Social Good Accelerator: We need Tech to run for Social Good](#) Social Good Accelerator Europe is a European movement born in 2017 out of the observation that the technological transition of social economy and civil society organisations, which work and innovate every day for the general interest, is not yet sufficiently taken into account by public authorities, companies and investors. It is, however, a sine qua non for European innovation and competitiveness centred on respect for life, social justice and climate change. This technological transition, which leads to greater efficiency for the for-profit players in the sector, but also to new safeguards, must be accelerated and placed at the heart of European transition strategies, to steer our models towards greater inclusion and collective well-being.

The Social Good Accelerator EU collective has been federated into an association since 2018 and brings together more than 30 member organisations in 5 countries. It leads an advocacy, a community of solidarity and offers tools to support actors who need to better understand or wish to contribute more to the technological transition of public interest organisations in Europe.

We are working to increase the influence and knowledge of public interest organisations in Europe on issues of technological transition.

Our three pillars of action: Public Affairs (lobbying), Research and Community (knowledge sharing, networks, collective action).

We bring together more than 60 European members, representing more than 1500 organisations from the Social Economy and Civil society.

## **Partners in this contribution**

