Social Good Accelerator EU
European Tech Acceleration Movement
general interest organisations

Position paper

White Paper Artificial Intelligence
of the European Commission

(in addition to the May 2020 Data Strategy Position Paper)

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 put people first in the development of technology, as well as the need to defend and promote European values and rights in the way technology is designed, built and deployed in the real economy.

The European Commission's White Paper on Artificial Intelligence (AI) aims to build an AI ecosystem that will bring the benefits of the technology to European society and economy as a whole, for citizens (improved public services); for business (new generation of products and services in areas where Europe has a lead); and in the field of services of public interest. This strategy paper argues that the use of AI systems can play a significant role in achieving the Sustainable Development Goals, and in supporting the democratic process and social rights.

The Social Good Accelerator EU, a European association that advocates for the technological acceleration of general interest organisations, considers that these objectives must absolutely include the actors of the Social and Solidarity Economy, recognised since 2011 by the European Commission as one of the levers of "intelligent, sustainable and inclusive growth". This sector, which has a limited profit-making potential, seeks to reconcile solidarity, economic performance and social usefulness, demonstrates a certain resistance to crises – as demonstrated once again during the COVID 19 crisis – and makes a major contribution 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. Reading the AI White Paper, AI research seems to be disconnected from civil society and SSE actors, and therefore from the target audiences of these organisations

Furthermore, in terms of AI development challenges, SSE faces the same challenges as SMEs, with some additional specific challenges. In particular, SSE organisations benefit from less funding, due to their economic model (limited profit or non-profit) and the lack of a European legal framework onlimited profit modelsand social mission enterprises; they need specific and adapted acculturation to digital issues and finally they are faced with an even greater challenge than VSEs/SMEs in recruiting competent people on these issues.

In reading the White Paper on the European Commission's Artificial Intelligence strategy, it seems fundamental to us to recall the key role of Social Economy and European Civil Society organisations in defining the creation of economic, social and environmental value related 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 the devices in order to take full advantage of the opportunities that AI offers for society as a whole.

We are therefore developing a number of proposals, combined with those contained in our previous position paper on the Data Strategy.

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

The excellence of this ecosystem should be considered in terms of economic but also 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, focusing on the human factor AND the environmental factor

The European bodies presiding over the definition of regulatory and investment strategies are still too business-oriented. While ethics is an area that benefits from broad expertise at the institutional level, societal and environmental uses as well as the inequitable 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 multidisciplinarity within the European Commission's [High Level Expert Group on Artificial Intelligence.](#)

We therefore call for **more diversity and multidisciplinarity, including experts from Social Economy organisations and civil society, in the European Commission's advisory bodies on Artificial Intelligence, and beyond on the digital economy.** This diversity and multidisciplinarity are essential for the implementation of an AI strategy consistent with the Green Pact, an economy serving people and the new impetus for European democracy. The Social and Solidarity Economy and civil society now have real experts in the digital field, who represent alternative ways of thinking and production methods, at the service of citizens, economic and digital inclusion, education and human rights. They should be regularly consulted on the main lines of the "Digital Europe" strategy.

I.B) An ambitious plan for initial and continuing training, off and online, on AI, giving social economy 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, in particular within the framework of the Next Generation Eu plan, to finance a major retraining/reintegration programme in the artificial intelligence professions via SSE models, focusing on employment integration companies (Simplon.co, Samaforce, etc.) and multi-partner programmes such as Territoires Zéro chômeurs (France).

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

In this respect, the networks of third places, Fablabs and Makers, and the enterprises for integration through training and employment, which have demonstrated their capacity for citizen innovation during the Covid crisis, could act as operators. Many of them are "non for profit" and belong to the Social and Solidarity Economy sector in Europe. This training component could also partly involve "peer-to-peer" training in the form of pro bono (e.g. free secondment of employee trainers from start-ups / large companies to SSE organisations).

Popular education networks could also be encouraged to develop programmes that contribute to strengthening the education of children and adolescents in the fields of digital culture, as well as digital mediation actors who contribute to increasing the skills of citizens and audiences who 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 better recognise and value the human behind the AI. Indeed, many AI systems actually involve large amounts of human labour, often hidden from end-users[1], resulting in a lack of transparency to users and consumers of services, but also in a form 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 humanities and social economy actors.

Indeed, the Social Solidarity Economy (including civil society) has many assets to develop AI poles of excellence in Europe.
- Knowledge of social needs to make AI more inclusive and real business models of inclusion through training and employment in the digital economy (the MedNum and Aptic, Simplon.co (France), Becode (Belgium), Waag (Netherlands), CDI Portugal...
- Clustering and cooperation models specific to the SSE, which could inspire the digital economy (e.g. Territorial Poles of Economic Cooperation (PTCE); large partnerships

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[1] See the example cited by the EESC in its opinion INT/887 Human-centred artificial intelligence (annotation 13): 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.

between training and integration companies and Tech companies such as Simplon.co and Microsoft)
- A real potential for the production and analysis of SSE meta-data useful for the ecological and societal transition, which is currently largely underestimated and under-exploited.

A real partnership between research actors (STEM and Humanities) and Social Economy organisations should be fostered. Applied research could be conducted in particular, in partnership, on the issues of diversity of AI producers and AI biases to propose more inclusive and equitable AI models.

The design of AIs 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 support the social and environmental transition

Greater inclusion of Social Solidarity Economy organisations in political and public decisions on AI could allow for better arbitration in terms of investments in machine learning while preserving human resources where they are essential to sovereignty, environmental preservation, equity and social justice.

The inclusion of investment criteria on the hybridisation of economic models and public-enterprise-SSE partnerships is in particular an avenue to be explored.

Beyond that, we propose that the EU adopts the framework of the Sustainable Development Goals as a guideline for the future development of AI. We also advocate for a sustainable implementation of AI by individual organisations, including good practice in information and consultation.

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 the general interest represented by the organisations of the Social and Solidarity Economy.
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

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production by AIs seems to us to call for a multidisciplinary field of experimentation and new opportunities for financing fields of social utility.

A free license model based on the "Creative commons" license could also be considered, to make algorithms designed to accelerate the ecological and societal transition available to civil society.

Areas of cooperation between mainstream companies and SSE organisations also open up a number of opportunities in artificial intelligence and should be encouraged, through public procurement, dedicated funding envelopes and greater political valorisation (see SBI Monitoring Reporton Cooperation - EASME/DGGrow, 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 TRUSTWORTHY, FAIR & DEMOCRATIC ECOSYSTEM

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

Together with the experts consulted, we have considered 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 networks, as representatives of social utility organisations and their beneficiaries, must be consulted. This is both to protect individual freedoms and data, equal access, and the anticipation of bias, but also to guard against the risk of over-regulation, which would be detrimental to small organisations, the majority of which are 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 shared.

> **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 tests (retro engineering) and propose a socially and environmentally responsible AI label.**

This body could be created as a higher council (model of the National Digital Council in France) or a European rating agency (on the model of Vigeo-Eiris) on AI.
In the field of AI, it would be appropriate to have a specific CSR evaluation and rating grid, which would be the responsibility of this body representing the diversity of economic actors. AI must integrate "by design" social and environmental responsibility, and this body could be in charge of a Labelling/Certification.

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

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

The conditions for the implementation of this Position Paper

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

➔ **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:** we would particularly like to thank Jean-Gabriel Ganascia (Chairman of the CNRS Ethics Committee, 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) for their insights

Who are we? - Social Good Accelerator EU: European movement for the tech transition of non-profit organisations

The [Social Good Accelerator:WeneedTech torunfor SocialGoodSocial](#) Good Accelerator Europe is a European movement born in 2017 from an observation: 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. Yet it is a sine qua non condition for European innovation and competitiveness centred on respect for the living world and social and climate justice. This technological transition, which leads to greater efficiency for the profit-making players in the sector, but also to new risks, must be accelerated and placed at the heart of European transition strategies, in order to direct 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 solidarity community and offers tools to accompany actors who need to better understand or wish to contribute more to the technological transition of general interest organisations in Europe.

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

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

We have more than 60 European members, representing more than 1,500 organisations in the social and solidarity economy.

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Partners in this contribution

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