



On 8 July 2021, the CPME Executive Committee adopted the 'CPME response to Public Consultation on a set of European Digital Principles (CPME 2021/075 FINAL).

CPME response to Public Consultation on a set of European Digital Principles

Public consultation on a set of European Digital Principles

Fields marked with * are mandatory.

Introduction

General context

In just a year, the COVID-19 pandemic has radically changed the role and perception of digitalisation in our societies and economies. Digital technologies are now imperative for working, learning, entertaining, socialising, shopping, and accessing services such as health and culture.

The pandemic has also exposed the vulnerabilities of our digital space, and its impact on our societies. A new digital divide has emerged, not only between well-connected urban areas and rural areas, but also between those who can fully benefit from an enriched and secure digital space, and those who cannot. Now more than ever it is clear that digital policies must help nurture more democratic and inclusive societies, and ensure that all people in the EU can leverage the digital transformation for a better life.

To address these challenges in a comprehensive way, the [Communication “2030 Digital Compass: the European way for the Digital Decade](#) (Digital Compass Communication) sets out a vision that is about solidarity, democracy, prosperity, and sustainability, anchored in the empowerment of people and businesses. Digital infrastructure and rapid connectivity can bring new opportunities by enabling people to reach out beyond specific territories, social positions or community groups, and open new possibilities to learn, have fun, work, explore and fulfil one’s ambitions.

The Communication also refers to Digital Citizenship, emphasizing that the deployment of digital infrastructures, strong skills and capacities and bringing businesses and public services in the digital sphere cannot, alone, define the EU’s approach to its digital future. It is also necessary to enable all Europeans to make full use of digital opportunities and technologies, to have a society where geographical distance matters less, so that all Europeans can work, learn, interact with public administrations, manage their finance and payments, make use of health care systems, benefit of intelligent transport systems, participate in democratic processes, be entertained or meet and discuss with people anywhere in the EU, including those residing in rural and remote areas.

The Commission will, therefore, propose a set of digital principles that should shape Europe’s digital society in the European way in the form of a joint interinstitutional solemn declaration of the European Commission, the European Parliament and the Council, based on a proposal from the European Commission. This vision will also be proactively promoted in the EU’s external relations.

Declaration of Digital Principles

A joint interinstitutional solemn declaration of the European Commission, the European Parliament and the Council would be a political declaration. The objective of the declaration is to compile a set of principles that guide the ‘European way’ for the digital society and to make them known and visible to all those living in the EU. **Such a set of digital principles would allow to inform users and to guide policymakers and digital operators** in order for Europeans to fully benefit from their digital citizenship.

The Commission hopes to achieve decisive progress with the other institutions on a Declaration of Digital Principles by the end of 2021, and the **involvement of citizens and other stakeholders is crucial in this exercise.**

Consultation objective, and targeted stakeholders

The focus of the present consultation is on digital principles. A separate and dedicated consultation will be organised in preparation of the Digital Compass Policy Programme which is another follow-up initiative from the **Digital Compass Communication.**

This consultation aims at collecting the views of all interested stakeholders including other EU institutions, Member State, regional and local authorities, NGOs and civil society organisations, international and umbrella organisations, other digital stakeholders, and citizens.

The results of this consultation will serve as input to a proposal of a set of digital principles.

Questionnaire structure and practical information

The questionnaire is divided in the following sections:

- Information about the respondent
- Section I containing questions on digital principles in several sub-sections
- Section II providing the possibility to propose additional digital principles
- Closing section containing the possibility to provide final comments and/or to upload a document

Written feedback provided in other document formats can be uploaded through the button made available at the **end of the questionnaire.**

The questionnaire will be **available in all official EU languages at the beginning of June**. A web accessible version of the questionnaire will be made available at the same moment.

The consultation will remain open until **Thursday 2 September 2021 - 24h00.**

About you

* Language of my contribution

English

* I am giving my contribution as

Non-governmental organisation (NGO)

* First name

Sara

* Surname

Roda

* Email (this won't be published)

sara.roda@cpme.eu

* Organisation name

255 character(s) maximum

CPME - Standing Committee of European Doctors

* Organisation size

Micro (1 to 9 employees)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

927 694 3405-41

* Country of origin

Please add your country of origin, or that of your organisation.

Belgium

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.**

Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Section I - Questions on digital principles

This section asks you to share **your views on possible digital principles that could be included in a set of digital principles.**

What are digital principles?

The Digital Compass Communication makes a **clear distinction between already defined fundamental rights and other rights on the one hand, and the concept of digital principles on the other.** It recalls that the European way for the digital society is also based on ensuring full respect of EU fundamental rights. The following areas are particularly relevant in the digital environment:

- Freedom of expression, including access to diverse, trustworthy and transparent information,
- Freedom to set up and conduct a business online,
- Protection of personal data and privacy,
- Protection of the intellectual creations of individuals in the online space,
- Protection of consumers online,
- Non-discrimination.

Digital principles should be understood as **essential concepts based on common European values serving as a foundation for a human-centred, secure and open digital environment.** When implemented through policy initiatives, such principles will be applied together with other rights and principles and for the overall public interest. Where these principles reflect rights enshrined in law, those rights remain unaffected.

The Digital Compass Communication mentions the following as examples of principles:

- Universal access to internet services,
- A secure and trusted online environment,
- Universal digital education and skills for people to take an active part in society and in democratic processes,
- Access to digital devices, systems, devices and services that respect the climate and environment,
- Accessible and human-centric digital public services and administration,
- Ethical principles for human centric algorithms,
- Protecting and empowering children and young people in the online space,
- Access to digital health services.

1.1 Universal access to internet services

Access to a fast and reliable broadband connection (fixed and mobile) and services is crucial as key societal and economic services are delivered online. Digital infrastructures have become essential for people and are the most fundamental building block of the digital transformation. Access to digital infrastructures is therefore a key condition for social inclusion in a digital society. Connectivity, i.e. physical access to digital infrastructure, enables people to undertake online activities anytime, anywhere, and enables businesses to process and make use of vast amounts of data. Every person living in the EU should have access to an internet connection allowing them to use modern-day digital services, including e-government and e-justice services, e-health including telemedicine, distance and online learning, telework, online financial services, e-commerce and online communication platforms.

Ensuring that all those living in the EU have adequate access to connectivity has been a central effort of the EU since the liberalisation of telecommunications markets. The '[European Gigabit Society Communication](#)' sets a range of objectives for network deployment by 2025, with Gigabit and 5G connectivity at the centre of the strategy. The [European Electronic Communications Code](#) ('the Code'), sets the regulatory landscape to support the rollout of very high-capacity networks. Moreover, the EU regulatory framework enhances the protection of users of communications networks and services. The Universal Service provisions in the Code are focused on affordability to all consumers of an adequate broadband internet access and of voice communications. Moreover, rules include for example minimum information requirements for contracts, as well as provisions regarding provider switching and number portability as well as equivalent access and choice for end-users with disabilities. The European Pillar of Social Rights identifies digital communications among the essential services everyone shall have access to and call for support measures for people in need (Principle 20 – Access to essential services).

EU law ([Regulation \(EU\) 2015/2120](#)) grants end-users the directly applicable right to access and distribute the lawful content and services of their choice via their internet access service. It enshrines the principle of open internet access: internet traffic should be treated equally without discrimination, blocking, throttling or prioritisation.

How important are the following principles for you?

	Very important	Important	Neutral	Not important	Not important at all	I don't know / no opinion
"Everyone should have access to the internet through an affordable and adequate connection."	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
"Everyone should be able to access and distribute internet content and services without discrimination."	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
"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."	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

You can also provide comments, propose alternative formulations or elaborate on possible other principles that you want to be considered in this area:

500 character(s) maximum

The right to access and distribute internet content should be lawful and unarmful. The online advertising of unhealthy and harmful products (e.g. alcohol, tobacco, foods high in fat, sugar and salt), particularly via games and social media, due to potential exposure for vulnerable groups (e.g. children, youths, persons with disabilities and persons suffering from mental health disorders), should be considered illegal. (cont. in final comments).

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

The COVID-19 pandemic has revealed how important digital skills of people on the one side, and digital capabilities of education and training institutions and systems on the other side, are for active participation in education and training, the labour market and society at large. In an unprecedented shift, digital technologies have allowed many pupils, learners and students to study remotely, parents to work from home keeping their jobs, companies to stay afloat and enabled social interactions to continue despite social distancing. As outlined in the Digital Compass Communication, Europe needs digital savvy citizens, a digitally skilled workforce, people who can use and understand, but also develop and create cutting-edge technologies to be ready for the new world. It will also be important to set healthy boundaries in an increasingly connected world to, for example, set decent working conditions and preserve the boundaries between professional and private life.

In addition, we learn from the experience of the large-scale use of digital learning practices. Digital technologies have a huge, and largely untapped potential for improving education and training. They are powerful tools for making the learning experience more inclusive, personalised and flexible, when everyone is offered the same opportunities. They could also provide access to education for those who otherwise might experience difficulties with accessing face-to-face education instruction, such as learners in remote areas or those with mobility difficulties.

Furthermore, a high level of media and digital literacy is an important factor to enable all those living in the EU to make informed decisions in the digital age. Media and digital literacy is a pre-requisite for a fair, sound and vibrant modern democracy. It is an essential tool for empowering people as well as raising their awareness and helping counter the effects of disinformation campaigns and fake news spreading through digital media and the online space. Moreover, as technologies such as artificial intelligence systems advance rapidly in all parts of society, there is a growing and pressing need for people to have a basic understanding of AI and data in order to engage positively, critically and ethically with this pervasive technology.

For this to happen, there are necessary conditions that must be fulfilled for all: for example high-speed Internet connectivity needs to be available everywhere, all learners need to have devices to learn from distance and access to high-quality and secure digital content, tools and platforms. At the same time, teaching and training staff need to be equipped with the adequate infrastructure and equipment, digital competences and pedagogical support to make the digital learning experience of high quality for everyone. Therefore, ensuring inclusion and equal access to quality digital education for all learners, regardless of

age, background, location or disabilities, is a major challenge to overcome to make sure that no one is left behind in the Digital Decade.

How important are the following principles for you?

	Very important	Important	Neutral	Not important	Not important at all	I don't know / no opinion
“Everyone should have the possibility to have access to high-quality and inclusive digital education (infrastructure, connectivity, equipment, content and pedagogical practices).”	<input checked="" type="radio"/>	<input type="radio"/>				
“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.”	<input checked="" type="radio"/>	<input type="radio"/>				
“Everyone should receive safeguards for a healthy balance in their use of digital technologies for working and learning.”	<input checked="" type="radio"/>	<input type="radio"/>				
“Everyone should be able to be empowered through education to navigate the digital (media) environment in a safe, critical and confident manner.”	<input checked="" type="radio"/>	<input type="radio"/>				
“An 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.”	<input checked="" type="radio"/>	<input type="radio"/>				

You can also provide comments, propose alternative formulations or elaborate on possible other principles that you want to be considered in this area:

500 character(s) maximum

Healthy boundaries between professional and private life in the connected world should also apply between student and private life, respecting students moments of rest. The right to disconnect for professionals and students should be established. This is a corollary of the concept of 'healthy living' (practice of health enhancing behaviours) which needs to be strongly encouraged. The individual needs to learn to make healthy choices (cont. final comments).

1.3 Accessible and human-centric digital public services and administration

The digital transformation presents opportunities for public administrations and authorities to re-design the services they offer to better address people's and businesses' needs. Such human-centric digital public services should be accessible, inclusive, interoperable, transparent and personalised, co-created with their intended users and designed to respond to their needs, preferences and rights in full respect of personal data protection rules.

Human-centric digitalisation strategies also allows public administrations to take into account the linguistic diversity of their populations when designing and providing public online services and engaging with users online. Decision-making and policies can and should be communicated to persons in the relevant official national language of their choice, both online and offline, to support the democratic processes.

Since human-centric digital public services have the potential to enhance access to public services for all parts of society, it is important to ensure that everybody is able to reap these benefits no matter where they are in the EU. Obstacles have to be reduced and diverse user groups, particularly vulnerable groups should be consulted in the design of such services (for example, digital solutions must be designed using state of the art standards to make them accessible for persons with disabilities).

Furthermore, digitalisation should bring policy and public decision-making closer to the people by for example, using digital technologies and solutions to underpin and support open democracy initiatives. There are tremendous opportunities for more inclusive policy-making, wide-ranging engagement with people, and more grass-roots action for developing local initiatives. Next to bringing digitalisation closer to people, digital technologies and solutions can be used to contribute to better levels of public security and safety by for example traffic monitoring systems, fire sensors, automated alert systems.

How important are the following principles for you?

	Very important	Important	Neutral	Not important	Not important at all	I don't know / no opinion
"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."	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
"Every person should have the possibility to engage in the creation and improvement of digital public services that are tailored to their needs, preferences."	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
"Every person should submit their data or information only once when they are digitally interacting with public administrations across the European Union."	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
"Digital services offered by the public sector such as digital identity solutions should be interoperable and allow data portability across the EU."	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
"Digital technologies and solutions should enable a wide-ranging engagement of and with people and stimulate the development of participatory initiatives at all levels."	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
"Digital technologies and solutions should contribute to better levels of public security and safety."	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

You can also provide comments, propose alternative formulations or elaborate on possible other principles that you want to be considered in this area:

500 character(s) maximum

1.4 Access to digital health services

Digital health (eHealth) solutions are essential to the provision of health services to all Europeans, as they can support the resilience and compatibility of health and social care systems. The COVID-19 pandemic has demonstrated the urgent need to accelerate the digital transformation of health and care services in our societies. Access to digital services and data exchange and sharing are critical in maintaining continuity and quality of care within national healthcare systems as well as across borders.

Digital technologies, such as telemedicine (i.e. the practice of medical services using technology to deliver care at a distance), have the potential to reduce the burden on healthcare systems and to provide equal opportunities for people who have barriers to access hospitals, e.g. people living in geographically remote areas. In addition, the use of digitalisation (e.g. big data) may significantly reduce healthcare system costs and can play a key role in identifying cost-effective treatments, particularly for complex and rare diseases. Furthermore accessibility must be ensured to avoid excluding persons with disabilities from accessing digital health services on an equal basis with others.

How important are the following principles for you?

	Very important	Important	Neutral	Not important	Not important at all	I don't know / no opinion
“Everyone should have access to the full benefits of digitisation of health and care services, including personalised medicine and telemedicine.”	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
“Digital health and care services should be inclusive, accessible, equitable and designed to meet peoples’ needs.”	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
“Everyone should have secure, digital access to their electronic health records.”	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

You can also provide comments, propose alternative formulations or elaborate on possible other principles that you want to be considered in this area:

500 character(s) maximum

Telemedicine can be a useful additional tool, however, it is not without risk and is not suitable in all clinical scenarios. Face-to-face consultations should remain the gold standard. The use of telemedicine should not be influenced by commercial factors nor used as a cost-saving measure to justify closure of healthcare facilities (e.g. in less populated or under-served areas), nor imposed as a target practice. Physicians in collaboration with patients (cont. final comments).

1.5 An open, secure and trusted online environment

The online space plays an increasingly central role in peoples' communications, information sharing and democratic participation. Digital services such as online platforms have been a driving force for a vibrant information exchange online. However, they have also facilitated new ways to disseminate illegal content, to sell illegal and/or unsafe goods or services and for cyber-threats to proliferate, manipulating online environments and causing societal harms. While it is certain that the online environment is complex, and, just as in the offline world, not all crime can be prevented, measures to counter such challenges are needed, both from private parties such as online platforms, and from public authorities. Such measures should be based on law, be effective and proportionate and safeguard all rights, in particular freedom of expression, non-discrimination, protection of personal data and privacy, high level of consumer protection. We need to aim for a favourable environment for an inclusive, respectful and pluralistic public debate online.

Furthermore, digitisation and connectivity increase cybersecurity risks, thus making society more susceptible to cyber threats and exacerbating the dangers faced by individuals. Mitigating these risks for all Europeans is paramount particularly as more and more devices are connected to the internet.

How important are the following principles for you?

	Very important	Important	Neutral	Not important	Not important at all	I don't know / no opinion
"Everyone should be able to enjoy an open and transparent online environment, where a diversity of opinions is encouraged and protected."	<input checked="" type="radio"/>	<input type="radio"/>				
"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."	<input checked="" type="radio"/>	<input type="radio"/>				

<p>“Everyone providing their services online should expect fair dealing, including in their relationship with online platforms.”</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>“Everyone should benefit from confidentiality of their electronic communications (e.g. phone conversation, emails, etc.) and protection of information on their electronic devices (e.g. computers, phones, ...).”</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

You can also provide comments, propose alternative formulations or elaborate on possible other principles that you want to be considered in this area:

500 character(s) maximum

The professions subject to confidentiality and “professional secrecy”, such as doctors, deserve the same level of protection online as offline. The data that a doctor processes from a patient within the exercise of his /her profession or as a result of his/her profession, needs to be protected and respected in full (cont. final comments).

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

Around one in five internet users are children or young people (up to 18 years old) in the European Union, and they are accessing the internet at ever-younger ages across a diverse range of devices. During the last years, they have been spending more and more of their time on the internet, browsing social media, playing online games and using mobile apps for example.

The internet offers many opportunities for learning, communication, creativity and entertainment but it also opens up certain risks to vulnerable users such as children and youngsters. In a fast-changing technological landscape, it is necessary to provide children – and families - with high quality, age-appropriate, informative and entertaining online content and services. This will help the 90 million children and young people in the EU to acquire the skills and awareness to become competent and confident digital citizens, and to become relevant players in shaping Europe’s digital future and active participants in European democratic processes.

However, being online also brings certain risks for children and keeping them safe without limiting their online opportunities has to be a priority for policymakers, industry and other relevant actors. Children’s well-being and best interests should be a key priority for policymakers. The highest standards of ethics, privacy and safety should be incorporated by default into the design of laws and the development, usage and marketing of products and services.

Furthermore, around half of European teenagers have encountered harmful content such as cyberbullying,

sexting or violent and disturbing content while online. Children may also face situations online, such as cyberbullying, exposure to unwanted explicit content, or grooming leading to physical or sexual abuse, that are difficult to share and discuss, even with trusted adults. When the abuse is also recorded and shared online, the harm is perpetuated as the victims are re-victimized with the spread of the online material. This can affect their health, well-being and self-respect, and early abuse or harm can damage the child with long lasting effects.

Last, but not least, participation is a key aspect of citizenship and an integral part of democracy. Children and young people should be actively involved in making decisions on processes and consulted on laws, policy and initiatives, which might affect them. Child and youth participation should be supported at the local, national and European level.

How important are the following principles for you?

	Very important	Important	Neutral	Not important	Not important at all	I don't know / no opinion
“The online environment should foster children’s and young people’s well-being and their participation as digital citizens.”	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
“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 and age and throughout their education and training.”	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
“Every child should be protected from harmful and illegal content, including from child sexual abuse and exploitation.”	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

You can also provide comments, propose alternative formulations or elaborate on possible other principles that you want to be considered in this area:

500 character(s) maximum

The long-term impact on children and young people’s health, both physical and mental must be considered. The principle should encompass ‘prevention’ against the negative effects of the online space, reading as “Protecting and empowering children and young people in the online space and preventing the negative effects thereof”. This will ensure that children and young people are able to live healthy lives, which will in turn reduce the incidence of non-communicable diseases.

1.7 A European digital identity

Building trust in the online environment is key to economic and social development. Lack of trust, particularly because of a perceived lack of legal certainty, is a clear concern for people when interacting and accessing services online. Similarly to the use of passports and other recognised identification means, a secure and trusted digital identity allow people and businesses to safely and securely access public and private services online, in full respect of their rights, including privacy and data protection. A universally available, recognised and accepted digital identity is key to empowering people and to the functioning of the Single Market.

How important are the following principles for you?

	Very important	Important	Neutral	Not important	Not important at all	I don't know / no opinion
“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.”	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
“Everyone should be protected against identity theft, alteration or manipulation.”	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

You can also provide comments, propose alternative formulations or elaborate on possible other principles that you want to be considered in this area:

500 character(s) maximum

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

The EU is committed to ensuring that digital technologies, including networks, datacentres and equipment should be sustainable. The ICT sector must shift towards a circular model to minimise the use of finite resources and lead the transition to a climate neutral society by becoming climate neutral before 2040 (with datacentres by 2030). It is important that the environmental costs of digital technologies are significantly lower than the resource, energy and emissions savings they enable.

How important are the following principles for you?

	Very important	Important	Neutral	Not important	Not important at all	I don't know / no opinion
“Everyone should have the possibility to obtain information on the environmental footprint of digital products and services.”	<input checked="" type="radio"/>	<input type="radio"/>				
“Digital products and services should be produced, and used with the lowest possible environmental impact.”	<input checked="" type="radio"/>	<input type="radio"/>				

You can also provide comments, propose alternative formulations or elaborate on possible other principles that you want to be considered in this area:

500 character(s) maximum

1.9 Ethical principles for human-centric algorithms

Artificial Intelligence (AI) systems are machine-based systems that can, for a given set of human-defined objectives, generate output such as predictions, recommendations, or decisions influencing real or virtual environments. They are usually based on a set of algorithms, which are step-by-step instructions on how to solve a given problem.

Such systems (and the underlying algorithms) can have a big impact, and could also support individuals considerably in making better, more informed choices in accordance with their personal goals. Their design should be based on human dignity, implying that a system's functionality should not decrease, limit or misguide human autonomy (human dignity implies that all people are treated with respect).

In addition, these systems should be designed to act as enablers for a flourishing and equitable society and democracy with a particular attention to prevent potential negative side effects.

Furthermore, algorithmic systems should also be used in a beneficial way for all people, regardless of their ethnic origin, gender, age or socio-economic background. They should be central to help tackling some of the most pressing environmental and societal concerns and must be designed to be used in the most environmentally friendly way possible, for example by minimising energy consumption or help solving complex problems by advanced computing.

How important are the following principles for you?

	Very important	Important	Neutral	Not important	Not important at all	I don't know / no opinion
"No one should be limited or purposefully misguided by algorithmic systems against their autonomy and free will."	<input checked="" type="radio"/>	<input type="radio"/>				
"Everyone should benefit from algorithmic systems that foster their individual and societal well-being."	<input checked="" type="radio"/>	<input type="radio"/>				

You can also provide comments, propose alternative formulations or elaborate on possible other principles that you want to be considered in this area:

500 character(s) maximum

No algorithm systems should exploit vulnerabilities of persons due to age, physical or mental disabilities regardless of whether actual physical or psychological harm is caused.

Section II - Questions on additional digital principles

This section invites you to share **additional digital principles that could be included in a set of digital principles**.

In your view, are there other relevant digital principles that are not covered by the above areas?

- Yes
- No
- I don't know/no opinion

You can write down these additional principles here:

500 character(s) maximum

Please try to use one sentence per possible principle, and a similar format as the above-mentioned principles.

- Right to disconnect for professionals and students, that is to refrain from engaging in work-related tasks, such as phone calls, emails and other digital communication, outside working hours. This includes holidays & other forms of leave.
- Right for a 'clean data slate' at the age of 18. When children are old enough to understand the consequences of data collection, they should be granted the right to demand companies (cont. final comments).

Closing section: additional remarks and possibility to upload a document

Thank you for your contribution to the public consultation on a set of European Digital Principles.

You can provide any final comments here:

Due to the 500 word limitation, please see below the complete comments in relation to the following sections:

- Section 1.1, Universal access to internet services: The right to access and distribute internet content should be lawful and unharmed. The online advertising of unhealthy and harmful products (e.g. alcohol, tobacco, foods high in fat, sugar and salt), particularly via games and social media, due to potential exposure for vulnerable groups (e.g. children, youths, persons with disabilities and persons suffering from mental health disorders), should be considered illegal. The establishment of a principle on 'universal access to internet services' does not collide with the need to restrict illegal and harmful content as a general rule at a national and EU level.
- Section 1.2, Universal digital education and skills for people to take an active part in society and in democratic processes: Healthy boundaries between professional and private life in the connected world should also apply between student and private life, respecting students moments of rest. The right to

disconnect for professionals and students should be established. This is a corollary of the concept of 'healthy living' (practice of health enhancing behaviours) which needs to be strongly encouraged. The individual needs to learn to make healthy choices, not only physical, mental, spiritual and economic, but now also digital, fighting against addictive behaviours, sedentary activities, adequately respond to cyberbullying and passive-aggressive online behaviours, among other.

- Section 1.4, Access to digital health services: Telemedicine can be a useful additional tool, however, it is not without risk and is not suitable in all clinical scenarios. Face-to-face consultations should remain the gold standard. The use of telemedicine should not be influenced by commercial factors nor used as a cost-saving measure to justify closure of healthcare facilities (e.g. in less populated or under-served areas), nor imposed as a target practice. Physicians in collaboration with patients should have the right to determine whether a face-to-face consultation is more appropriate.

- Section 1.5, An open, secure and trusted online environment: The professions subject to confidentiality and "professional secrecy", such as doctors, deserve the same level of protection online as offline. The data that a doctor processes from a patient within the exercise of his/her profession or as a result of his/her profession, needs to be protected and respected in full (ex. principles of the medical profession when practicing telemedicine <https://www.wma.net/policies-post/wma-statement-on-mobile-health/>; patient confidentiality in telehealth <https://www.wma.net/policies-post/wma-statement-on-guiding-principles-for-the-use-of-telehealth-for-the-provision-of-health-care/>; CPME Policy on Telemedicine https://www.cpme.eu/index.php?downloadunprotected=/uploads/adopted/2021/3/CPME_AD_Board_20032021_012.FINAL_.CPME_.Policy.on_.Telemedicine.pdf).

- Section II - Additional Principles:

- Right to disconnect for professionals and students, that is to refrain from engaging in work-related tasks – such as phone calls, emails and other digital communication – outside working hours. This includes holidays and other forms of leave.
- Right for a 'clean data slate' at the age of 18. When children are old enough to understand the consequences of data collection, they should be granted the right to demand companies to delete any personal information collected about them, as data subjects, prior to their legal emancipation, safeguarding patient data as determined by the data subject him/herself.

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