



The voice of blind and partially sighted people in Europe

European Blind Union response to the European Commission's public consultation on a set of European Digital Principles

EBU Position Paper | August 2021

Object of the consultation

Context of the consultation

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. (...) 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. (...)

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. (...) 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.

Aim of the consultation

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.

Feedback

1. Access to internet services

How important are the following principles for you?

- a "Everyone should have access to the internet through an affordable and adequate connection."
- b "Everyone should be able to access and distribute internet content and services without discrimination."
- c "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."

Reply: all very important.

Comments:

Despite EU law on equal right of access by persons with disabilities to electronic communications, including mobile and internet services, and emergency services (EECC), persons with disabilities still face accessibility, financial, connectivity and other barriers to these services. Moreover, digital products used for accessing the internet or mobile services are inaccessible and/or unaffordable for many persons with disabilities, as well as not interoperable with assistive technologies.

2. Digital education and skills

How important are the following principles for you?

- a “Everyone should have the possibility to have access to high-quality and inclusive digital education (infrastructure, connectivity, equipment, content and pedagogical practices).”
- b “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.”
- c “Everyone should receive safeguards for a healthy balance in their use of digital technologies for working and learning.”
- d “Everyone should be able to be empowered through education to navigate the digital (media) environment in a safe, critical and confident manner.”
- e “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.”

Reply: all very important.

Comments:

COVID-19 revealed how key the issue is for children with disabilities and their families. Distance learning often excluded children with disabilities, and many governments failed to immediately address this. Students did not have access to their support persons, and for many distance learning was not accessible. Ensuring accessible digital education and developing the related skills for persons with disabilities is necessary, but without reducing non-digital educational solutions and services.

3. Digital public services and administration

How important are the following principles for you?

- a “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.”
- b “Every person should have the possibility to engage in the creation and improvement of digital public services that are tailored to their needs, preferences.”
- c “Every person should submit their data or information only once when they are digitally interacting with public administrations across the European Union.”

- d "Digital services offered by the public sector such as digital identity solutions should be interoperable and allow data portability across the EU."
- e "Digital technologies and solutions should enable a wide-ranging engagement of and with people and stimulate the development of participatory initiatives at all levels."
- f "Digital technologies and solutions should contribute to better levels of public security and safety."

Reply: all very important.

Comments:

We welcome the Commission's emphasis on accessibility and interoperability of digital public service and administration for persons with disabilities. The Web Accessibility Directive already sets obligations. Also consider the risks and opportunities to fundamental rights and privacy. As for the digitalisation of public decision-making can bring many opportunities for more inclusive policy-making, but should not be to the exclusion of other ways to engage.

4. Digital health services

How important are the following principles for you?

- a "Everyone should have access to the full benefits of digitisation of health and care services, including personalised medicine and telemedicine."
- b "Digital health and care services should be inclusive, accessible, equitable and designed to meet peoples' needs."
- c "Everyone should have secure, digital access to their electronic health records."

Reply: all very important.

Comments:

Persons with disabilities face significant barriers to healthcare due to inaccessibility of information, communication and procedures, as exposed by Covid-19. Digitalisation allows greater access to healthcare, but can also create barriers if the systems, information, processes are not accessible and interoperable with assistive technologies, or if persons with disabilities do not have access to the technology or the necessary skills. There are sensitive implications on privacy and data protection, too.

5. Open, secure and trusted online environment

How important are the following principles for you?

- a “Everyone should be able to enjoy an open and transparent online environment, where a diversity of opinions is encouraged and protected.”
- b “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.”
- c “Everyone providing their services online should expect fair dealing, including in their relationship with online platforms.”
- d “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, ...).”

Reply: all very important, except c (neutral).

Comments:

As we get more dependent on digital technologies, their impact on Sustainable Development Goals in various spheres grows. Despite this, millions of persons with disabilities in the EU still face exclusion from digital participation due to lack of accessibility of online platforms and digital services. We were disappointed with the disregard of this issue in the European Commission’s proposals for the Digital Services Act and the Digital Markets Act.

6. Children and young people in the online space

How important are the following principles for you?

- a “The online environment should foster children’s and young people’s well-being and their participation as digital citizens.”
- b “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.”
- c “Every child should be protected from harmful and illegal content, including from child sexual abuse and exploitation.”

Reply: all very important.

Comments:

The above comments under 2 and 5 are also relevant for protecting and empowering children and young people with disabilities in the online space. Moreover, children and young people using assistive technologies can be at risk of their disability being exposed against their will and discriminated due to algorithms in social media or search engines, if websites detect their use of assistive devices.

7. European digital identity

How important are the following principles for you?

- a “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.”
- b “Everyone should be protected against identity theft, alteration or manipulation.”

Reply: both very important.

Comments:

While digital identity can allow more efficient and quick access to private and public services, but not for persons with disabilities if problems of accessibility remain. Alternative, non-digital solutions should always exist in parallel.

8. Digital products and services that respect the climate and environment

How important are the following principles for you?

- a “Everyone should have the possibility to obtain information on the environmental footprint of digital products and services.”
- b “Digital products and services should be produced, and used with the lowest possible environmental impact.”

Reply: a very important; b neutral.

9. Human-centric algorithms

How important are the following principles for you?

- a “No one should be limited or purposefully misguided by algorithmic systems against their autonomy and free will.”
- b “Everyone should benefit from algorithmic systems that foster their individual and societal well-being.”

Reply: both very important.

Comments:

AI has the potential to support accessibility for and participation of persons with disabilities in everyday life, but not if the legal framework around AI fails to protect them from discrimination and creates further barriers instead of supporting equality. AI can intensify the existing patterns of inequality if not approached with caution. It is most often used to increase efficiency and productivity rather than to better serve individuals, not to mention marginalised communities.

10. Other

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

Reply: I don't know/no opinion

11. Additional remarks

In general, we feel that if the digital society is to represent a way forward, not a setback for the inclusion of persons with disabilities – in particular those with visual impairment – the EU regulatory framework should contain mandatory requirements to ensure that the digital society is accessible and respects the fundamental rights of persons with disabilities, as well as strong assessment, enforcement and redress mechanisms. In fact, accessibility is rather regressing in many areas today due to the digital aspects, and the most significant progress in this area we owe indirectly to US Section 508, which is characterised by heavy sanctions, and not for instance to the EU Web Accessibility Directive.

For further details, we refer to the response of our umbrella group, the European Disability Forum (EDF).

About EBU

The European Blind Union (EBU) – **Interest Representative Register number 42378755934-87** – is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind and partially sighted people in Europe. It currently operates within a network of 41 national members including organisations from 25 European Union member states, candidate countries and other countries in geographical Europe.

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