



**European Committee  
of the Regions**

Brussels, 24 November 2021

**Parallel CoR consultation on a set of European Digital Principles**  
Results of the ECON targeted survey

## **1. Background**

On 12 May 2021, the European Commission launched a public consultation on the formulation of a set of principles to promote and uphold EU values in the digital space. These principles will guide the EU and Member States in designing digital rules and regulations that deliver the benefits of digitalisation for all citizens, and include, among others, a "universal access to internet services", "an access to digital health principles", an "accessible and human-centric digital public services and administration" etc. The original public consultation was open until 2 September 2021 and the European Commission has already published its results here: [Declaration of Digital Principles – the ‘European way’ for the digital society \(europa.eu\)](https://ec.europa.eu/economic_policy/econ/declaration-digital-principles).

Given that local and regional authorities are seen as important stakeholders whose views should be more extensively represented in the upcoming joint interinstitutional Declaration on Digital Principles, the CoR has launched a parallel consultation among the members of the CoR, other representatives of the local and regional authorities and relevant third parties. The consultation was open from 14 July to 10 October 2021.

The parallel consultation included the original principles as put forward by the European Commission and new principles as recommended by past CoR opinions and CoR consultative work. In total, in addition to 30 original principles, 28 new principles have been added, nearly doubling the original number. Moreover, two original principles have been further developed, adding some text to target them more clearly. The list of principles, both original and those added by the CoR, together with the results, is in the following chapters of this report. The principles have been grouped into the identical clusters, as put forward by the European Commission, to ease comparison of the results:

1. Universal access to internet services
2. Universal digital education and skills for people to take an active part in society and in democratic processes
3. Accessible and human-centric digital public services and administration
4. Access to digital health services
5. An open, secure and trusted online environment
6. Protecting and empowering children and young people in the online space

7. A European digital identity
8. Access to digital devices, systems and services that respect the climate and environment
9. Ethical principles for human-centric algorithms

The survey gathered the views and experiences of 29 CoR members, representatives of territorial associations and development agencies across 11 EU Member States<sup>1</sup>. The participants could respond by attributing each principle its importance within a predefined scale (very important / important / neutral / not important / not important at all / I have no opinion). They were also able to provide comments in a free text format.

## 2. Main conclusions

Although the response rate has been lower than expected (mainly because of a nearly doubled number of principles and thus the need for more time to complete the survey), the consultation has gathered interesting insight into which digital principles are important to local and regional authorities and CoR members.

- In general, all the principles within the survey received a very positive feedback: there was no principle receiving more negative or neutral answers than positive ones;
- the original principles, put forward by the Commission, received more positive feedback than the ones added by the CoR. More specifically, this applies to the principles in clusters 1 (Universal access to internet services), 5 (Open online environment) and 6 (Children and youth online), whereas in clusters 3 (Accessible digital public services) and 9 (Ethical principles) new principles were considered more important. In cluster 2 (Universal digital education), the original principles received a "very important" or "important" answer in less cases than the new principles, but the latter received also several "neutral" replies.
- Cluster 7 A European digital identity was considered as the most important one, receiving "very important" / "important" feedback in 98% replies, including 79% of replies considering this cluster as "very important"; This cluster, encompassing principles and terms such as secure, trustworthy on the one hand and theft, alteration or manipulation on the other hand, is being very actively protracted by digital gatekeepers and some Member States, each offering their own solutions. This cluster might even have substituted – in responses received – cluster 5 on open online environment, which in total received less "very important" / "important" reactions (90%) than Cluster 7.
- Another very important set of principles is within Cluster 1 Universal access to internet services, with 96% of answers marking them as "very important" / "important". This showcases the importance of access to the internet for citizens. Nevertheless, this cluster concerns mainly "physical" access to the internet, whereas the "digital skills and education" aspect of digitalisation, covered by Cluster 2, received 89% of "very important" / "important" answers only (making it the third lowest cluster). This implies that more promotional work is required on the skills aspect of digital cohesion.
- In addition, four other clusters received a positive feedback higher than 90%: cluster 4 (93%), cluster 3 (92%), cluster 9 (92%) and cluster 5 (90%), implying that people

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<sup>1</sup> Austria, Belgium, France, Germany, Greece, Hungary, Ireland, Malta, Netherlands, Romania and Spain.

consider access to their health records and having public administration digitalised among the most important principles related to digital transformation

- On the other hand, cluster 8 on "digital that respects the environment" received "only" (compared to other clusters) 81% reactions as "very important" / "important", together with 16% of neutral answers. Here, it appears that the link between the digital transformation and climate change is not always obvious and more promotional activities on the importance of the twin digital and green transitions should be conducted;
- As the most important principles, the participants indicated that "Everyone should have access to the internet through an affordable and adequate connection, including in border regions with other Member States and with third countries" (principle 1.1) and that "Every child should be protected from harmful and illegal content, including from child sexual abuse and exploitation." (principle 6.3), both having received 90% of replies noting them as "very important". This also highlights the focus on connectivity as one of the tools to address a growing digital divide between regions and the importance of the security of children and minors online. Whereas the principle "Everyone should be protected against identity theft, alteration or manipulation," (7.2), also focuses on online security but scored 86% of "very important" replies.

### 3. Analysis of clusters

Note: the principles (text) added by the CoR is marked in **RED**

#### 3.1 Universal access to internet services

	Very important	Important	Neutral	Not important	Not important at all	I have no opinion
1.1 "Everyone should have access to the internet through an affordable and adequate connection, including in border regions with other Member States and with third countries."	90%	10%	0%	0%	0%	0%
1.2 "Everyone should be able to access and distribute internet content and services without discrimination."	69%	28%	3%	0%	0%	0%
1.3 "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."	66%	34%	0%	0%	0%	0%
1.4 "Access to and active participation in the digital economy are key to successful local and regional development in the future."	61%	32%	7%	0%	0%	0%
1.5 "Digital cohesion, as an important additional dimension of the traditional concept of economic, social and territorial cohesion should be duly enshrined in the EU Treaties, making sure that no region or person should be left behind."	57%	36%	7%	0%	0%	0%
1.6 "The fibre optic technology, as an indispensable digital infrastructure and basic service, should be available to all people in the European Union, especially in rural areas that other technologies struggle to reach."	55%	38%	3%	0%	3%	0%

This cluster of questions received in total 96% of positive feedback (66% "very important" and 30% "important" principles), thus being second place among clusters. For the principle "Everyone should

have access to the internet through an affordable and adequate connection, including in border regions with other Member States and with third countries.", whose second part has been adjusted by the CoR, 90% of the participants claimed that this principle was very important (in fact one of the two most important principles in the whole survey). The remaining 10% of replies claimed that this principle was "important".

The principle "Digital cohesion, as an important additional dimension of the traditional concept of economic, social and territorial cohesion should be duly enshrined in the EU Treaties, making sure that no region or person should be left behind." is currently in the spotlight of the CoR activities and has been included in the CoR members' contribution to the Conference on the Future of Europe. However, it received 57% "very important" replies and 36% "important" replies, the additional 7% taking a neutral stance.

The least supported principle "The fibre optic technology, as an indispensable digital infrastructure and basic service, should be available to all people in the European Union, especially in rural areas that other technologies struggle to reach." received in total 55% "very important" and 38% "important" answers. In this case, one comment accompanying a "not important" answer suggested that "the choice of delivery technology should not be prescribed: faster 5G options, etc. may emerge".

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

	Very important	Important	Neutral	Not important	Not important at all	I have no opinion
2.1 "Everyone should have the possibility to have access to high-quality and inclusive digital education (infrastructure, connectivity, equipment, content and pedagogical practices)."	69%	21%	7%	0%	3%	0%
2.2 "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."	66%	31%	3%	0%	0%	0%
2.3 "Everyone should receive safeguards for a healthy balance in their use of digital technologies for working and learning."	55%	31%	7%	3%	3%	0%
2.4 "Everyone should be able to be empowered through education to navigate the digital (media) environment in a safe, critical and confident manner."	62%	38%	0%	0%	0%	0%
2.5 "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."	38%	52%	10%	0%	0%	0%
2.6 "A clear distinction between digital education and online or remote learning – imposed during lockdown measures – needs to be made."	31%	34%	28%	3%	0%	3%
2.7 "A robust awareness-raising based on transparent assessment of the fifth generation of mobile communications technologies is needed, in order to ensure that citizens fully understand the benefits and disadvantages of the infrastructure –	55%	14%	28%	3%	0%	0%

including studies of the ecological and health effects – rather than becoming victims of fake news".						
2.8 "Education in the digital world, particularly digital and media literacy, not only in educational institutions, is a way of ensuring that all people can participate in digitalisation in an autonomous way."	37%	56%	7%	0%	0%	0%
2.9 "EU citizens should have access to a comprehensive framework training programme to address the lack of data experts and data literacy in the EU."	36%	54%	11%	0%	0%	0%
2.10 "Digital education should be an integral part of lifelong learning and both, public and private sectors, should take up their responsibility for educating and training citizens so that they remain competitive and fit for the labour market while developing fully in their personal lives."	69%	31%	0%	0%	0%	0%
2.11 "Educational technologies should remain a tool and not replace in-person education, as the skills of teachers are irreplaceable."	64%	36%	0%	0%	0%	0%

Within this cluster, six new principles have been added in addition to five original principles. This cluster scored overall 89% of positive feedback (53% "very important" and 36% "important"), whereas 9% of answers in total were neutral. This, again, shows the importance of promoting in the value of digital skills, and digital literacy as a key component of digital cohesion (in addition to a universal access to the internet).

The principle "Digital education should be an integral part of lifelong learning and both, public and private sectors, should take up their responsibility for educating and training citizens so that they remain competitive and fit for the labour market while developing fully in their personal lives." has been added by the CoR and received the highest share of "very important" (69%) and "important" (31%) answers, showcasing the importance of digital education within lifelong learning.

The principle "Everyone should have the possibility to have access to high-quality and inclusive digital education (infrastructure, connectivity, equipment, content and pedagogical practices)." was the second most important principle within this theme, gaining 69% of "very important" replies and 21% of "important" replies. However, there were also 7% taking neutral stances and 3% indicating that this principle was not important at all.

On the other hand, only 37% of respondents claimed that "Education in the digital world, particularly digital and media literacy, not only in educational institutions, is a way of ensuring that all people can participate in digitalisation in an autonomous way," was a very important principle, which made it the least preferred principle.

Two principles, "A clear distinction between digital education and online or remote learning – imposed during lockdown measures – needs to be made." and "A robust awareness-raising based on transparent assessment of the fifth generation of mobile communications technologies is needed, in order to ensure that citizens fully understand the benefits and disadvantages of the infrastructure – including studies of the ecological and health effects – rather than becoming victims of fake news" received 28% of neutral and 3% of "not important" replies, showing a rather weak understanding of both principles. The second

principle received a comment stating that "it is often misinterpreted by the same critics and publishers of fake news."

Another participant noted that "in education at all levels a considerable accent should be put on fighting cyberbullying and on raising awareness in matters of internet safety.", which, however, should fit better with clusters 5 and 6.

### 3.3 Accessible and human-centric digital public services and administration

	Very important	Important	Neutral	Not important	Not important at all	I have no opinion
3.1 "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."	72%	24%	0%	3%	0%	0%
3.2 "Every person should have the possibility to engage in the creation and improvement of digital public services that are tailored to their needs, preferences."	34%	55%	7%	3%	0%	0%
3.3 "Every person should submit their data or information only once when they are digitally interacting with public administrations across the European Union."	38%	38%	17%	7%	0%	0%
3.4 "Digital services, based on open standards and technical specifications, Application Programming Interfaces (APIs) and shared data models, offered by the public sector such as digital identity solutions should be interoperable and allow data portability across the EU."	62%	31%	7%	0%	0%	0%
3.5 "Digital technologies and solutions should enable a wide-ranging engagement of and with people and stimulate the development of participatory initiatives at all levels."	38%	52%	0%	7%	0%	3%
3.6 "Digital technologies and solutions should contribute to better levels of public security and safety."	64%	32%	4%	0%	0%	0%
3.7 "European values and ethical rules, as well as social and environmental standards, also apply in the digital sphere; and the EU should actively promote these European values and ethical rules globally."	61%	32%	4%	4%	0%	0%
3.8 "The Member States should follow the EU toolbox for secure 5G networks to ensure Europe's cybersecurity and protect Europe's geo-political interests against the threat of surveillance and espionage related to the deployment of 5G networks using technology from third countries."	62%	34%	3%	0%	0%	0%
3.9 "Efficient and secure data sharing between all levels of government, including at local and regional level, is a key factor for effective law application and enforcement at national and subnational level."	72%	21%	7%	0%	0%	0%

This cluster is of key importance for local and regional authorities, as it touches upon their own role and the services they are offering. The principles grouped therein scored 92% of "very important" and "important" replies, although none of the principles scored more than 72% of "very important" replies.

The most important principles within this cluster were the ones on "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" (3.1) and "Efficient and secure data sharing between all levels of government, including at local and regional level, is a key factor for effective law application and enforcement at national and subnational level" (3.9) that has actually been added by the CoR. Both principles scored 72% of "very important" replies, while the first one received also 24% of "important" replies and the second 21%.

In this cluster, the participants preferred the principles added by the CoR, with the three last principles having scored on average 65% of "very important" replies and 29% of "important" replies compared to 51% and 36% respectively for the original five principles.

The participants also underlined the importance of the consent to use/not to use data: Data privacy law has to be easily understandable, applicable and free of lobbyist interests and if data is collected anonymously, aggregated and used for improved services, it could be submitted on a regular basis.

**3.4 Access to digital health services**

	Very important	Important	Neutral	Not important	Not important at all	I have no opinion
4.1 "Everyone should have access to the full benefits of digitisation of health and care services, including personalised medicine and telemedicine."	66%	21%	10%	3%	0%	0%
4.2 "Digital health and care services should be inclusive, accessible, equitable and designed to meet peoples' needs."	62%	34%	3%	0%	0%	0%
4.3 "Everyone should have secure, digital access to their electronic health records."	76%	21%	0%	3%	0%	0%

Unsurprisingly, the cluster focusing on digital health services, scored amongst the most important clusters. In total, 68% of replies considered them "very important" and 25% of them "important".

More than three out of four replies in general indicated that "everyone having secure, digital access to their electronic health records" is "very important", while 21% percent thought that this principle was "important". Even for the least preferred principle on "Digital health and care services should be inclusive, accessible, equitable and designed to meet peoples' needs", 62% of replies indicated "very important" while 34% indicated that it was "important".

Some participants also indicated that citizens should not be forced to agree to digitalization in the field of health and care services as they do not want their sensitive data to be out of their control.

## 5. An open, secure and trusted online environment

	Very important	Important	Neutral	Not important	Not important at all	I have no opinion
5.1 "Everyone should be able to enjoy an open and transparent online environment, where a diversity of opinions is encouraged and protected."	52%	34%	7%	3%	0%	3%
5.2 "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."	76%	21%	3%	0%	0%	0%
5.3 "Everyone providing their services online should expect fair dealing, including in their relationship with online platforms."	64%	36%	0%	0%	0%	0%
5.4 "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, ...)."	83%	10%	3%	3%	0%	0%
5.5 "EU businesses and citizens should have full access to legally secured data flows beyond the European Union."	55%	34%	3%	7%	0%	0%
5.6 "Citizens and businesses should be protected from any risks emerging from data sharing, processing and storage. Technical tools and standards should be fully available to make the exercise of individuals' rights simple and not overly burdensome."	59%	31%	7%	3%	0%	0%
5.7 "Existing liability privileges need to be applied with reference to European values, including for those platforms whose business strategies are run from non-EU countries."	32%	46%	14%	4%	0%	4%
5.8 "The EU market location principle should apply for algorithmic systems that are sensitive from the point of view of fundamental rights."	31%	48%	14%	7%	0%	0%
5.9 "The EU should achieve technological independence, including through an appropriate industrial policy commitment to promoting European champions."	55%	38%	7%	0%	0%	0%
5.10 "Member States should follow the EU toolbox for secure 5G networks to ensure Europe's cybersecurity and protect Europe's geo-political interests against the threat of surveillance and espionage related to the deployment of 5G networks using technology from third countries."	52%	41%	7%	0%	0%	0%
5.11 "EU citizens should be provided for with "personal data spaces", with more possibilities for everyone to control who can access and use their data in accordance with the GDPR."	50%	39%	4%	4%	4%	0%
5.12 "robust measures to defend civil liberties and democracy in an increasingly digitalised era should be put in place, including steps to reduce the risks of a "digital big brother" and to fight fake news, disinformation campaigns, hate speech and discrimination, particularly racism, in the digital realm, regardless of whether these negative phenomena originate within or outside the EU."	64%	25%	4%	7%	0%	0%
5.13 "While keeping anonymity of internet users in accordance with applicable rules, the principle of	66%	31%	0%	3%	0%	0%



"What is illegal offline should stay illegal online" should be kept and enforced at all times."						
5.14 "While there is nothing anti-competitive about building a successful business, excessive market power and potential abuses by gatekeeper platforms should be redressed."	31%	55%	7%	7%	0%	0%

Cluster 5 on an open, secure and trusted online environment was one of the four clusters in the survey to receive positive feedback higher than 90%. The responses were more positive for the original principles that the European Commission put forward than the additions made by the CoR.

Around 3 in 4 participants marked the principle that "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." as being "very important". One of the comments added by a participant on this principle was that although freedom of speech is important, social media cannot continue to loudly project voices abusing this right.

Principle 5.4 on confidentiality being granted to those using electronic devices was the most salient theme in this cluster. It was deemed as "very important" by 4 out of 5 respondents, with an additional 10% agreeing that it was "important". Out of the remaining responses, 3% were neutral and the other 3% found that it was "not important".

The least preferred principle dictated that "Existing liability privileges need to be applied with reference to European values, including for those platforms whose business strategies are run from non-EU countries." It resonated as "very important" with 32% of participants, as "important" with 46%, whilst another 14% remained neutral. It was marked as "not important" by 4% and the last 4% had "no opinion".

There was a comment contributed by a respondent on principle 5.13 regarding the anonymity of online users. They stated that one cannot remain anonymous in real life, which raises the question of whether online anonymity should continue to be the standard.

Additionally, a note provided by a participant on the cluster overall was that there needs to be strong European taxation that does not allow for any loopholes. They listed Ireland and Amazon as an instance of such abuse.

## 6. Protecting and empowering children and young people in the online space

	Very important	Important	Neutral	Not important	Not important at all	I have no opinion
6.1 "The online environment should foster children's and young people's well-being and their participation as digital citizens."	55%	41%	3%	0%	0%	0%
6.2 "Children and young people should be equipped with digital literacy and the necessary skills and competences to navigate safely and	76%	24%	0%	0%	0%	0%

responsibly online from an early and age and throughout their education and training."						
6.3 "Every child should be protected from harmful and illegal content, including from child sexual abuse and exploitation."	90%	10%	0%	0%	0%	0%
6.4 "Every child, when studying online, should have a right to disconnect and the schools should respect childrens' study – life balance."	45%	28%	21%	7%	0%	0%
6.5 "Every child, once turning 18, should have the right to disconnect from their online digital identity acquired as minor and should start their digital age "from scratch"."	41%	17%	17%	10%	7%	7%

Cluster 6 on protecting and empowering children and young people in the online space is another case of the original principles being received more positively than those introduced by the CoR. It is also another one of the four clusters that received positive feedback of over 90%. Principle 6.3 presents that "Every child should be protected from harmful and illegal content, including from child sexual abuse and exploitation." Of the responses, 90% claimed this was "very important" and the remaining 10% noted it as "important".

One of the principles put forward by the CoR, principle 6.4 on respecting a student's 'study-life balance', at 21%, was one of the four propositions with the highest number of neutral responses. Similarly, the second contribution of the CoR, principle 6.5 which states that "Every child, once turning 18, should have the right to disconnect from their online digital identity acquired as minor and should start their digital age 'from scratch'," had the highest percentage of "not important at all" submissions. This implies that more promotional work is required in these areas.

## 7. A European digital identity

	Very important	Important	Neutral	Not important	Not important at all	I have no opinion
7.1 "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."	72%	24%	3%	0%	0%	0%
7.2 "Everyone should be protected against identity theft, alteration or manipulation."	86%	14%	0%	0%	0%	0%

The European digital identity cluster was viewed as the most important by respondents. For principle 7.1 which finds that "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," 72% of participants marked it as "very important" and 24% as "important". Principle 7.2 on how "Everyone should be protected against identity theft, alteration or manipulation," was even more positively received. It was assessed as "very important" by 86% of respondents and "important" by the remaining 14%.

One of the suggestions posed by a participant of the survey was that just as citizens and businesses have national identification numbers, a digital identity certificate could then be assigned by a European authority to both as part of the digital transition.

## 8. Access to digital devices, systems and services that respect the climate and environment

	Very important	Important	Neutral	Not important	Not important at all	I have no opinion
8.1 "Everyone should have the possibility to obtain information on the environmental footprint of digital products and services."	41%	34%	21%	3%	0%	0%
8.2 "Digital products and services should be produced, and used with the lowest possible environmental impact."	52%	34%	10%	3%	0%	0%

There is broad support for the cluster on access to digital devices, systems and services that respect the climate and environment but there is notably less enthusiasm. The principle "Everyone should have the possibility to obtain information on the environmental footprint of digital products and services" drew a considerably high neutral response of 21%. This could be amended with more awareness-raising activity.

For the principle 8.2 on how "Digital products and services should be produced, and used with the lowest possible environmental impact" just over half of participants considered it "very important" while it was "important" to another 34%. One of the attached comments stressed that avenues to reduce consumption must be identified and carbon accounting should be promoted within companies.

## 9. Ethical principles for human-centric algorithms

	Very important	Important	Neutral	Not important	Not important at all	I have no opinion
9.1 "No one should be limited or purposefully misguided by algorithmic systems against their autonomy and free will."	66%	28%	3%	0%	3%	0%
9.2 "Everyone should benefit from algorithmic systems that foster their individual and societal well-being."	32%	43%	14%	4%	4%	4%
9.3 "The use of artificial intelligence and of other emerging digital technologies needs to be structured in a responsible way."	45%	52%	0%	3%	0%	0%
9.4 "Any decision making, based on data, in particular in connection with automated processing, must always be weighed up in the overall context."	57%	39%	0%	4%	0%	0%
9.5 "The digital society should be inclusive, fair and accessible to all, with a people-centred focus."	55%	41%	3%	0%	0%	0%

The cluster on ethical principles for human-centric algorithms was one of the two examples in which new additions made by the CoR were considered more important than those proposed by the European Commission. It is still worth noting that none of the principles received more than 66% of "very important" considerations.

The principle that "the use of artificial intelligence and of other emerging digital technologies needs to be structured in a responsible way." received the most positive feedback within this theme. It was indicated as "very important" by 45% and "important" by another 52%. This was closely followed by the support for the principles on weighing up decision-making when it comes to automated processing and on an inclusive digital society. Their high importance each totaled at 96%.

A participant commented in response to principle 9.1 on how "No one should be limited or purposefully misguided by algorithmic systems against their autonomy and free will." They added that although it is important, the limitations of algorithms make this difficult to achieve and that suggests greater transparency is a more suitable solution.

The results of this survey will feed into the political work of the ECON commission, which will hold a more in-depth discussion on the matter at upcoming ECON and Broadband Platform meetings.

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