

REIF Contribution 04/06/2025

# French social security committed to ethical AI serving the general interest

## Introduction

On 9 April 2025, the European Commission published a Communication establishing an AI Continent Action Plan intended to make the European Union ‘a global leader in artificial intelligence’ (AI). The same day saw the launch of a public consultation and a call for evidence concerning the adoption this year of an Apply AI Strategy, one of whose objectives would be ‘fostering the integration of AI solutions in the public sector to substantially improve the quality of services provided to the public’.

REIF, the European representation of French social security institutions, welcomes the adoption of such a strategy, as its members have for a long time been actively involved in developing various AI methods – machine and deep learning, Big Data – to improve the delivery of social benefits, and, more recently, have been experimenting with generative artificial intelligence (GAI) and LLM, following the launch of ChatGPT in 2022.

With their public service mission and, therefore, dealing daily with the personal data of **68.6 million users**, the French social security institutions are extremely cautious when trialling GAI, considering the proven risks, such as the disclosure of sensitive data, only proceeding when such tools present significant added value of general interest. This careful approach contrasts with the rapid development of AI technologies, making it an even more complex task to integrate these into the public sector.

**Compliance with European legislation**, notably with the General Data Protection Regulation (GDPR) and the AI Act, which is gradually entering into force, **is a major priority for REIF**. We emphasise that **it is vital, to guarantee trust among users, that these developments are part of an ethical approach**, in line with the requirements and principles set out in the Ethics Guidelines for Trustworthy AI and the European Declaration on Digital Rights and Principles. Such principles include **transparency, human oversight and the aim to promote ‘environmental and societal well-being’**.

### Summary of REIF's demands:

- Adopt a **proportionate approach** and **guarantee legal certainty and consistency** in the process of regulatory simplification;
- **Publish as soon as possible all the documents implementing the AI Act and clarify** the classification of GAI systems and how the AI Act interacts with the GDPR;
- **Include the social security institutions in the advisory bodies** set up by the European Commission to discuss AI;
- **Invest in European training and hosting infrastructure** able to help social security institutions develop **effective and robust** AI solutions, **in compliance with European legislation**;
- **Establish an interface for cross-border exchange** at European level to enable **sharing of examples of tested and developed AI use cases**;
- Ensure that the **European AI Skills Academy** provides **specific training for staff of the social security institutions**;
- **Carry out a mapping exercise to understand the impact of GAI on professions** and to inventorise training needs;
- Make sure that **the social security bodies are clearly eligible as public service bodies** under the multiannual financial framework 2028-2035.

### French social security institutions, fully engaged in innovation to enhance the efficiency and quality of public services

#### **Institutions with a public service task holding high-risk and sensitive personal data**

**Social security is one of the main public service areas of activity.** Governed by the principles of solidarity, universality and fairness, its task is to protect all citizens and residents on French territory from the consequences of various life events, also known as social risks, linked to health, old age, family, employment, housing or poverty and social exclusion.

It is **an essential public service, not just to ensure fair distribution of wealth, but also to increase the country's productivity and economic growth.** Each year, therefore, France spends almost **470 billion euros on social benefits**, i.e. almost 25% of the country's wealth, **including 9.44 billion for globally mobile persons**, in a context of increasingly frequent international migratory flows, particularly within the Single Market.

Each day, in the performance of their public interest activities, **the French social security institutions collect, hold and process personal data on the most intimate aspects of the life of the 68.6 million people living in the country**, such as their social security number, financial data or information on their income and family situation. Some of these data, such as health data, are even considered to be sensitive in the meaning of Article 9 GDPR, and are processed by the social security bodies pursuant, notably, to the exemption contained in letter h) of that article. In this regard, the Health Insurance is, for example, responsible for managing the National Healthcare Data System (Système National des Données de Santé (SNDS)), which contains around 450 terabytes of these data.

Trials of AI require a large volume of varied, structured and non-structured high-quality data. **Due to the sensitivity of these data, the social security institutions make sure to comply rigorously with the**

**legal and ethical principles set out in the GDPR and the AI Act, such as transparency, human involvement, digital inclusion and data minimisation, setting up a dedicated governance system and adopting ethical doctrines.**

Several of these institutions have set up a strategic governance system to steer and accompany the work on AI in a way which is transparent and collective, with officials being asked to help identify possible use cases. Ethical doctrines and charters have also been adopted, defining common rules which all local bodies undertake to follow. The family allowances branch, for example, has emphasised the following principles: primacy of the human factor; transparency; tackling discriminatory biases; energy sobriety; security; privacy; ensuring that AI is related to the task of serving beneficiaries.

**At stake here is the trust of those covered by the regime in the public authorities and democratic institutions**, especially since the 2025 [Digital Barometer](#) reveals that a majority of French people – 56% – say they do not trust AI.

As social security becomes increasingly digitalised, **the digital divide is, moreover, emerging as a major challenge, with the potential to exacerbate unequal access to services for the most vulnerable groups**. According to the Observatory on Inequalities ([l'Observatoire des inégalités](#)), in 2021, 8 million people in France were digitally illiterate. In order to ensure access to essential public services, in line with the European Declaration on Digital Rights and Principles, the digital service '[Aidants Connect](#)' is now available in France. A user having difficulty with digital systems can, through this service, authorise a professional helper to perform an on-line task or procedure on his or her behalf, securely and lawfully.

### **Trials of many AI use cases to improve access to social benefits**

**Automation of robotic processes has been used for some years now by the French social security funds**. At the family allowances branch, for example, almost 3.8 million documents were processed by digital assistants in 2023. Classic AI is also already widely used to combat fraud and errors, and to relate to users, through chatbots.

Following the general public release of ChatGPT, **all the French social security institutions became actively involved in multiple trials aimed at identifying and developing GAI use cases**, as well as considering new use cases for hybrid AI and even non-generative AI, with a view to generating tangible public interest benefits for all users and officials. More generally, this was done **as part of a general push to ensure accurate assessment of entitlement and to strengthen access to social protection**, in accordance with Principle 13 of the European Pillar of Social Rights.

**AI can indeed be a support to the staff of the social security funds, without replacing human decisions**, which still take priority. Officials can be helped in their daily work, freeing up time for them to perform other, added-value tasks or to support vulnerable members of the public in complex, sensitive cases. Internal general chatbots have, in particular, been developed to reply to emails from the public, to process difficult files, to carry out legal research and to develop software programmes.

**Tackling non-take up of rights is, moreover, one of the major challenges for the social security system**.<sup>1</sup> GAI could enable the development of solutions to pre-empt users, and to identify situations where individuals, often the most vulnerable, are not receiving the benefits which they are legally entitled to, mainly due to a lack of information.

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<sup>1</sup> The latest official figures available show non-take-up rates of 50% for the basic old-age pension, 34% for the minimum income (RSA) and 30% for unemployment benefit (DREES and DARES).

**Although tackling non-take-up involves complex cases requiring cross-checking of large quantities of data, this issue is still a priority.** Three members of REIF – CNAF (family benefits), CCSMA (the agricultural mutual fund) and CNAM (health insurance) – are currently participating in a European project on this issue. Other participants in this project, backed by the Commission’s Technical Support Instrument (TSI), are the INPS (Italian social security) and the OECD.

It is also essential to emphasise that **GAI is not a miracle solution and cannot, by itself, resolve all the issues hampering the effectiveness of the public service institutions, such as reducing non-take-up and the digital divide. The considerable carbon footprint and more general environmental impact of these technologies must also be borne in mind** before any new trial is carried out.

### **The French social security institutions call for ethical, controlled development of AI in the public services**

#### **Clarifying implementation of the AI Act**

**REIF fully supports the risk-based approach taken in the AI Act and the GDPR.** The French social security institutions, aware of the risks and costs associated with the deployment of AI in a public service, such as errors, discriminatory biases and breaches of personal data, insist that from its earliest stages, AI must be developed within a rigorous ethical institutional framework, with each planned use case being subject to prior examination and in-depth, systematic monitoring.

**According to the AI Act, AI systems related to access to public services and social benefits, particularly those used to assess the eligibility of natural persons for social assistance benefits and services, are in the high-risk category contained in Annex III.** The providers and deployment platforms of these AI system must therefore comply with numerous requirements.

In line with the general EU priority of simplification, the Commission, in its 2025 work programme, announced a digital simplification package by the end of the year, which will partially apply to the AI Act. In a [position paper published in April](#), REIF expressed its views on this simplification objective, **highlighting the need for a proportionate approach, and pointing to the longstanding commitment of the social security institutions to simplifying administrative processes for the benefit of companies and individuals.**

Considering this upcoming simplification of European legislation, **REIF emphasises the need to ensure legal certainty and consistency. The main task should be to clarify any uncertainties as to implementation of the AI Act.** In this regard, REIF welcomes the setting up of the ‘AI Act Service Desk’ announced in the AI Continent Action Plan. This should provide the social security institutions with personalised support in how to apply the Act.

While the AI Act is entering into force gradually, various delegated and implementing acts, guidelines and harmonised standards are yet to come. The documents which have already been published, particularly the guidelines on the definition of AI systems and the prohibited AI practices, as well as model contractual clauses for procurement of these systems, have brought vital clarifications, enabling institutions to comply with the Act. REIF therefore calls on the Commission **to publish all these documents as soon as possible, to facilitate compliance with the legal obligations, and to translate these legal requirements into technical, non-functional specifications.**

**Further clarification could be given, in particular, on the classification of GAI systems.** Since the purposes of these systems cannot, by their very nature, be known in advance, it is difficult to determine

whether they would fall into the high-risk category, which is subject to far stricter obligations than other categories.

**Clarification on how the AI Act interacts with the GDPR is also necessary**, particularly the role of the national data protection authorities, as well as any convergence between the fundamental rights impact assessment for high-risk AI systems required by Article 27 of the AI Act and the data protection impact assessment in Article 35 GDPR.

As part of the simplification work, moreover, and given the increasing complexity of the rules in this area, another idea would be to envisage, at European level, **the development of an AI tool able to radically simplify the various regulatory strata, so they can more easily be applied.**

Finally, to facilitate integration of AI into the public service sector, in line with European legislation, **it is essential to involve the social security institutions, with their wealth of operational experience, in the consultative bodies such as the Advisory Forum of Article 67 of the AI Act, or the structured dialogues referred to in the AI Continent Action Plan.**

### **Invest in innovation to ensure European digital sovereignty**

As public service bodies responsible for processing personal data, the social security institutions are very attentive to cybersecurity issues and risks of data breaches. **They are therefore actively involved in developing internal systems and in the use of secure and sovereign external infrastructure.** URSSAF Caisse nationale, for example, the body in charge of **Recovery**, is leading work with other branches to develop a private shared cloud for the use of all the social welfare institutions.

REIF welcomes the Commission's announced intention to invest in infrastructure, particularly via the development of AI Gigafactories. Currently, there is no **European hosting and training infrastructure able to help the social security institutions develop efficient and robust AI solutions compliant with European regulations – the GDPR, the AI Act and the cybersecurity regulation 2019/881.** The lack of such infrastructure is a major barrier to integration of AI in the public services.

### **Set up a European-level interface for cross-border exchange of social security AI use cases**

By pooling AI-related developments at European level, their integration into the public services could be significantly speeded up, thus optimising resources. This year in France, a group has been set up, bringing together AI experts from the various social security branches, to discuss common issues and problems and to develop a library of use cases.

Similar joint work could be envisaged at the level of the Single Market, since the concerns linked to AI do not stop at national borders. The European Commission, then, could **set up a digital interface for EU-level cross-border exchange on AI use cases developed within the public services, or more specifically within the social welfare institutions.** Such a platform would make it possible to **list and share tested and developed AI use cases, and the related technical information**, including any trials which had failed. **It would also promote the sharing of expertise and experience between lawyers and data science experts from the bodies in various countries**, particularly concerning any difficulties encountered and effective solutions implemented. Such joint work would also **save money and time.**

### **Guarantee improved AI skills for officials with the help of strengthened European support**

**Integration of AI into the social security system has significant human resource implications and costs for the 150,000 employees.** It is also essential to develop and maintain the skills of the workforce, to **guarantee strategic autonomy for the social welfare institutions.**

**REIF members are therefore investing massively in training and familiarising their staff with AI**, to make them aware of the implications of GAI, but also to reduce inequalities in knowledge and access to these tools. URSSAF Caisse nationale, for example, has launched a travelling, immersive exhibition, 'Explor'AI', visiting each local body, to demystify GAI and mitigate staff fears.

Development and maintenance of AI solutions, moreover, comes with a need to recruit data science experts and to create new posts and units, combining experts in the field and in information systems. **The public service, however, suffers from a serious lack of attractiveness compared to the private sector**, which makes it more difficult to recruit and retain these staff.

REIF takes note of the initiatives and resources planned in the communication on the Union of Skills, and in the AI Continent Action Plan, to attract talented people, particularly the AI Skills Academy. But in order to properly meet the needs of the social security bodies, **REIF calls for such an academy to provide direct, specific and tailored training programmes for social security staff, and/or the necessary resources for this training to be implemented. This EU support is particularly justified since qualification of staff is explicitly required in Article 4 of the AI Act.**

A study, moreover, is being carried out by the Observatory of the UCANSS (Union of National Social Security Funds) **to gain a better understanding of the impact of GAI on trades and professions** and to produce an inventory of training needs. **This European-level mapping exercise** would have real added value.

### **Facilitate access of social security institutions to European funds to support the very costly development of AI**

**Developing AI solutions is extremely expensive and requires substantial financial investment.** It is still, moreover, particularly complex to make an accurate upstream estimate of the added value generated by each project, particularly in terms of enhanced productivity, financial and environmental impacts. In a constrained budgetary context, with the need to reduce the public debt and social security spending, the social security institutions must act with restraint when trialling new tools.

**In this respect, the various EU funds offer significant financing opportunities.** The social security bodies, however, come up against major obstacles, such as complex administrative procedures and excessively restrictive eligibility criteria. REIF therefore calls on the Commission to **take account, in the drafting of its new multiannual financial framework for 2028-2035, of the need to ensure that social security bodies are identified clearly as eligible, as bodies providing a public service.**

Finally, **it is vital that European funds support the social security institutions in their implementation of the AI Act**, which requires, as previously stated, considerable human and financial resources.

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The European Representation of French Social Security Institutions (REIF) was set up in May 2003 to represent the main French social security funds to the European Union. Today, it brings together all the branches of the general scheme, professional schemes and specialised structures: health insurance, accidents at work and occupational diseases (Cnam), pensions (Cnav), family benefits (Cnaf), autonomy (CNSA), recovery (Urssaf Caisse nationale, formerly Acoass), the National Professional Union for Employment in Industry and Trade (Unédic), the Central Agricultural Social Mutual Fund (CCMSA), the National School of Social Security (EN3S), the Union of National Social Security Funds (Ucanss), the Centre for European and International Liaisons for Social Security (Cleiss) and the Retirement Pension Fund for Professional Air Crew Members in Civil Aviation (CRPNPAC). Reif has a permanent office in Brussels.

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