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## Social Credit System: A Discussion about the Utility of Chinese Digital Project in a European Union Settings

**Abstract:** The Social Credit System (SCS, 社会信用体系, *shèhuì xìnyòng tǐxì*), is an extremely interesting, ultimately nationwide pilot project, consisting of establishing the system of social rating, which, based on data collected over decades and stored both analog and with the use of state-of-the-art technologies will create profiles of citizens and businesses in the People's Republic of China. The system focuses on four main spheres – national enterprises and economy, society, the judiciary, and public administration. It is in them that a higher level of social trust and security will be ensured, law regulations better observed, corruption eliminated, and proper transparency guaranteed. In analyzing the issue of the Western world's attitude to the mechanism of digital surveillance and control of business and social activity in China, I should seek answers to the following questions, intriguing from the cognitive and practical perspective: Which of the above interpretations seems to be closer to the truth?; can the SCS have, at least partially, a universal character in the European Union, especially in the societies with a different system of values and the countries with a different political system than the one of the PRC?

**Keywords:** *China, European Union, democracy, digitalization, social credit system*

### Introduction

The Social Credit System (SCS, 社会信用体系, *shèhuì xìnyòng tǐxì*) is a nationwide Chinese political program, the idea realized by digital tools. It consists in establishing a system of social rating, which, based on data collected with the use of state-of-the-art technologies – will create profiles of all citizens and organizations with special SC-ID codes. Research and planning for a national credit score in China started in 1999, according to Lin Junyue, one of the most important minds behind the system. It began as a research project led by the World Economics and Politics Institute of the Chinese Academy of Social Sciences. The system focuses on four main spheres – national enterprises and economy, society, the judiciary, and public administration. According to the Chinese authorities, it is in them that

a higher level of social trust and security will be ensured, law regulations better observed, corruption eliminated, and proper transparency guaranteed (Wojciechowska 2021). The key question is whether these ambitious plans have been realized and whether SCS has achieved its goals.

At present, there are several different private systems with Sesame Credit by Alipay and Tencent Credit by Tencent at a head which have won the bidding for setting up an SCS for citizens. These are partly complementary to the main unified state system for monitoring and assessing enterprises, citizens, and government institutions with clear competencies for SCS for citizens (20% of the data) and SCS for organizations (80% of the data).

The SCS project was first officially mentioned as early as 2002 at the 16<sup>th</sup> Congress of the Communist Party of China (CPC), when the Party Secretary, Jiang Zemin, expressed the need to build a Social Credit System that would meet the requirements of the modern market economy. In 2002, the original name was proposed: *Shèhuì xìnyòng tǐxì*. Five years later, in 2007, for the efficient implementation of the concept, the Joint Inter-Ministerial Council on the Construction of the Social Credit System/ *Shèhuì xìnyòng tǐxì jiànshè bù jì liánxí huìyì* was established, and it was decided that the first pilot monitoring and ranking systems would be created, introduced and tested.

What was important for the practical part of project implementation was the introduction of a pilot scheme in Dazhong Xinyong in Suining in Jiangsu province in 2010. Although the scheme, having been heavily criticized for the subjective and arbitrary scoring system, had been quickly abandoned, it constituted a significant test of its functioning. After ten years of discussions and pilot projects, in 2014, the Chinese State Council announced a “plan” to further build the Social Credit System. According to responsible government officials, social credit would rate citizens in five dimensions: lawfulness, moral behavior, social engagement, activities of public interest, and environmental protection. With time, more provinces and institutions began working on pilot versions and databases. The progress of the system was monitored by the National Development and Reform Commission (NDRC) and the People’s Bank of China (PBoC). In 2017, the NDRC and the PBoC selected 12 model cities, including, among others, Suqian, Rongcheng, Weihai, Hangzhou, Wenzhou, and Xiamen (Pohlmann, 2018).

The Social Credit System’s main purpose turned to the enforcement of existing laws and regulations. This significant expansion culminated in the mentioned “Planning Outline for the Construction of a Social Credit System (2014 – 2020)”, issued by the Chinese State Council, and led to its most crucial period of construction. Social credit has become a fixture of the new ideological canon of “Xi Jinping Thoughts on Rule of Law”. In January 2021, the CCP’s Central Committee issued a new roadmap for the “construction of a rule-of-law society” until 2025. It includes a section on the SCS, highlighting its importance for China’s legal development agenda as a supporting pillar of the legal system. The broad range of policy goals projected on the system explains why what is generally translated as “social credit” is a clearly and legally defined concept. It sets up another pillar next to disciplinary actions

by police, courts, and party disciplinary committees, which allows restricting the mobility of citizens for any sort of behavior deemed negative according to the SCS catalog.

Documents and discussions of the system contain a set of terms that range from financial creditworthiness (征信) to broader trustworthiness, law-abiding behavior, or even moral values such as honesty and integrity (诚信/守信) (Drinhausen & Brussee, 2021). In 2013, the People's Bank of China issued a regulation in which it permitted the publication of the so-called black and red lists of citizens. The blacklist (黑名单, *hēi míngdān*) is a list of companies or citizens who committed fraud, broke the rules, failed to respect regulations, or did not comply with court judgments. This blacklist (失信被执行人 *shīxìn bèi zhíxíng rén*) or *laolai* (老赖) contains the names of companies or private persons who deliberately ignored court verdicts and did not rectify their behaviour. Since 2014, lists with the names of such people have been published online and can be freely accessed. Being blacklisted has huge repercussions for the life of a person or the business operations of a company (Schaefer, 2019).

According to the binding regulations, this fact has implications for all other aspects of the life and activity of a citizen or an entrepreneur. Penalties related to being put on such a list are varied and depend on the type of offense. So-called “public shaming” is often used – consisting in displaying the photographs of blacklisted people on screens and billboards located in different parts of a city (like in Anhui province). The largest blacklist in China is the Defaulter Blacklist, managed by the Supreme People's Court, which keeps a record of *laolai* – individuals and companies who fail to fulfill court-ordered obligations. Blacklist data is a matter of public record, and there are at least a dozen apps that allow users to search the court's dataset. *Laolai Checker* (老赖查询) is one of these – a search app for debtors that have landed on the Defaulter Blacklist. *Laolai* application is thus used to track debtors whose names are recorded in the main register of *laolai*. Thanks to the app (usually installed on a smartphone), the users can easily search for others by their names, go through the details of court cases, and check the current status of debt payments. Blacklisting is one of the key elements of China's SCS. However, the red list (红名单, *hóng míngdān*) is a list of people awarded for special merits and model behavior. There are rewards for respecting the rules specified by the system and penalties for breaking them (联合奖惩, *liánhé jiǎngchéng*).

### **The criticism of the SCS from the liberal democracy perspective**

From the perspective of the Western world, i.e., countries with a democratic political system and free market economy led by the US and EU, there remain some questions and at least partly well-founded doubts concerning the idea and implementation methods of the SCS in the PRC. The critics see the system as a mechanism of “social segregation,” a new tool for digital scrutiny that restricts civil liberties and any spontaneity in human behavior. They believe that the introduction of digital mechanisms for the supervision of the activity of

entrepreneurs, private individuals, and public institutions, monitored and assessed in real-time in order to automatically confront them with the positive and negative consequences of their actions, is unethical, multidimensionally harmful and unworthy of emulation, especially in free-market liberal democracies (Hoffman, 2018).

In the discourse on this issue carried out in the countries of liberal democracy, the SCS is usually perceived as “Orwell’s nightmare vision in which Big Brother and big data conspire to finalize the totalitarian plans of China’s autocratic leaders.” This vision is often compared to one of the episodes of the popular dystopian Netflix series “Black Mirror,” in which citizens constantly assess their interactions, converting them into scores<sup>1</sup>.

According to the critics: scholars, experts, journalists, and representatives of NGOs, who usually come from the Western cultural circle – led by the European Union, the United States, Great Britain, Canada, and Australia – the Chinese authorities, by implementing the SCS, decided to control the life and work of people in an almost unlimited and arbitrary way. They believe that variable parameters can be used – following the model of participation and competition in computer games (gamification) – to freely increase or decrease one’s rating, thus determining the quality of life and work of citizens and the future of business operations, with an opportunity to win and get promoted or a threat of loss and demotion. In line with this projection, the SCS will ultimately become a universal and very effective digital tool of the comprehensive surveillance and monitoring of business and personal activity. It will also serve the purpose of politicizing every business, public and private sphere in China, strengthening the authoritarian power of the CPC and threatening the export of such solutions to other countries and regions in which the authorities wish to enhance its autocratic political influence in the way analogical or similar to China’s model (Szewerniak, 2018).

John Moll is of a similar opinion. He believes that the Social Credit System is nothing more than the full surveillance and control of citizens. It thoroughly examines the life of each citizen – their relations with other people, behaviors, preferences, and the level of patriotism and support for the governing party. [...] The absolute support for the Communist party and the leader of the state and a clean criminal record should guarantee a high score at the very beginning. Citizens can then count on getting a better job and a higher salary, preferential loans, and a travel permit, and their descendants will automatically have a better start in life, with increased chances of being admitted into better schools and getting well-paid job positions. In turn, the criticism of the authorities, heavy debt burden, a criminal record,

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<sup>1</sup> In October 2016, the British dystopian TV series ‘Black Mirror’ aired *Nosedive*. In that episode, citizens use their cell phones to review each other on a 5-star scale after each social interaction and everyone’s average score is visible to everyone else. In such a world, any unpopular behavior or opinion leads to lower reviews and, from there, to social ruin. More: Nicolas Kayser-Bril, Personal Scoring in the EU: Not quite Black Mirror yet, at least if you’re rich, <https://algorithmwatch.org/en/personal-scoring-in-the-eu-not-quite-black-mirror-yet-at-least-if-youre-rich/>.

bad relations with other people, and many other factors will make individuals become social outcasts and fall into the inferior category of citizens [...] Points can be deducted in many different ways, for example, because of maintaining contacts with low-scoring people” (Moll, 2018).

- “What if every action that you took in your life was recorded in a score like it was a video game?“,
- “If your score drops to 950, you will be subject to re-education”,
- “It is the beginning of slavery, complete control, and the disappearance of all freedoms ...in China, they call it social credit”

These are just some of the statements made in parliamentary debates in Europe and online commentaries about China’s Social Credit System (China’s Social, 2022). In analyzing the issue of the Western world’s attitude to the mechanism of digital surveillance and control of business and social activity in China, we should seek answers to the following questions, intriguing from the cognitive and practical perspective:

- which of the above interpretations seems to be closer to the truth?
- can the SCS have, at least partially, a universal character in the world, especially in societies with a different system of values and countries with a different political system than the one of the PRC?
- what might be the implications of its use in the cultural and economic environment other than the Confucian one?
- is the SCS a unique solution or is it just the creative digital extension of practices that Western IT and e-commerce corporations have used for years?
- what is the European Union’s attitude to such a digital form of socio-economic management?

Trying to answer one of the questions asked in the introduction, Simon Denyer shares some intellectual provocation with the readers, writing: ... imagine the world where an authoritarian government monitors everything you do, amasses huge amounts of data on almost every interaction you make, and awards you with a single score that measures how “trustworthy” you are. In this world, anything from defaulting on a loan to criticizing the ruling party, from running a red light to failing to care for your parents properly, could cause you to lose points. And in this world, your score becomes the ultimate truth of who you are — determining whether you can borrow money, get your children into the best schools, or travel abroad; whether you get a room in a fancy hotel, a seat in a top restaurant — or even just get a date. This is not the dystopian superstate of Steven Spielberg’s “Minority Report,” in which all-knowing police stop crime before it happens. But it could be China by 2020” (Denyer, 2016).

The authors of a thought-provoking work entitled *The Chinese Social Credit System: A Model for Other Countries?* highlight that most Western commentators resolutely reject the Chinese Social Credit System. The words frequently used are that it is a ‘tool for totalitarian surveillance’, an invention of ‘the digital totalitarian state’ that it is ‘worse than

an Orwellian nightmare, a meeting of ‘big data’ with ‘Big Brother’, or indeed a meeting of Orwell’s 1984 with Pavlov’s dogs: ‘act like a good citizen, be rewarded and be made to think you’re having fun.’ Another frequent reaction is that the Chinese Social Credit System is incompatible with Western political and cultural values. For example, it has been suggested that it may be suitable for an authoritarian political system but not a liberal democracy.

Johan Lagerkvist, a Chinese internet specialist at the Swedish Institute of International Affairs, described the SCS as follows: “It is very ambitious in both depth and scope, including scrutinizing individual behavior and what books people read. It’s Amazon’s consumer tracking with an Orwellian political twist” (Hong, 2017).

The critics of the system say that this is not just about regulating the economy but also about creating a new socialist utopia under the Communist Party’s benevolent guidance. “A huge part of Chinese political theatre is to claim that there is an idealized future, a utopia to head towards,” said Rogier Creemers. “China is moving towards a totalitarian society, where the government controls and affects individuals’ private lives,” said Beijing-based novelist and social commentator Murong Xuecun (Hao Qun). “This is like Big Brother, who has all your information and can harm you in any way he wants”, argues Murong.

The critics argue that Chinese citizens face a new, gamified type of social obedience, i.e., the introduction of the mechanics of video/computer games to the spheres not directly related to them<sup>2</sup>. Hong is adamant in this matter, arguing that: “the government is attempting to make obedience feel like gaming. It is a method of social control dressed up in some points-reward system. It’s gamified obedience” (Hong, 2017). This is well illustrated in the 2021 documentary directed by Sébastien Le Belzic, *Ma femme a du crédit* movie, where he watches his Chinese wife participate in this totalitarian game.

In turn, William Glass, a threat intelligence analyst at cybersecurity expert FireEye, says a centralized system would be vulnerable and immensely attractive to hackers. Thus,

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<sup>2</sup> Gamification is the deliberate transfer of engaging mechanisms from video games to a non-game environment. To create gamification in an online form for the development of human capital, a platform is built that looks like a game and has a plot and game mechanisms: scores, rankings, progress bars, achievements, levels of difficulty, prizes, time challenges, or community tasks. The aim of gamification, however, is not “to play the game itself” but to build people’s involvement behavior, e.g., the habit of regular and effective personal growth, efficient work, and learning, and the improvement of other effects. By including elements drawn from games, we add the “fun” component to daily routines that are usually not quite “fun”. The total gamification of life means the compulsion to obey. Yet it is an entirely different type of obedience than the classical totalitarian regime. The whole mechanism is based on the priority of incentives, which both theoretically and practically (positive points outnumber negative ones) prevail over penalties. The struggle to maintain a high ranking should thus become an exciting game with rewards and a new kind of interpersonal rivalry based on Chinese people’s centuries-old passion for gambling and various games (cards, board games, PC, video, and mobile phone games, etc.). Hence, if citizens want to ensure proper living standards, they have to monitor themselves, usually using their own smartphones, rather than being forced to do it by the state’s apparatus of repression. See: Pacewicz, 2018).

there is a high risk of stealing points, artificially inflating the ranking and buying points, for example, via Darknet (Why One..., 2016).

Jörg Wuttke, president of the European Union Chamber of Commerce in China, pays attention to the corporate dimension of the SCS from the perspective of unprecedented challenges that foreign investors in China will have to cope with. “China’s Corporate Social Credit System is the most concerted attempt by any government to impose a self-regulating marketplace, and it could spell life or death for individual companies [...] For better or worse, China’s Corporate Social Credit System is here to stay. Businesses in China need to prepare for the consequences, to ensure that they live by the score, not die by the score.” argues Wuttke (The European Union Chamber..., 2019).

In turn, Nicole Kobie, a “Wired” contributing editor, addresses the broader, political dimension of the issue from the geopolitical point of view. She writes that the SCS regulations that can be largely apolitical on the surface can be political when the Communist Party of China decides to use them for political purposes. In April 2018, the Civil Aviation Administration of China (CAAC) sent letters to international airlines demanding they show Taiwan as part of China, saying the government would “make a record of your company’s serious dishonesty and take disciplinary actions” for any that didn’t comply. The system used to pressure the airlines was the pilot of the Civil Aviation Industry Credit Measures, which is part of the official Social Credit System (Kobie, 2019).

In the same vein, Samantha Hoffman, a non-resident fellow at the Australian Strategic Policy Institute, points out that the region of Xinjiang, in the northwest of the country, has become a „test bed” for China’s vast digital control operations. In particular, the largely Muslim minority of Uighur people has been subjected to increased surveillance and discrimination. It has been uncovered that more than 500,000 face scans of Uighurs have been conducted. Because of that, no other country should be considering this idea, says Hoffman. “The West should not copy any aspect of social credit. [...] Often comparisons are drawn between private applications like Uber and its rating system for customers and drivers. While these private company systems are extremely problematic in my view, they are fundamentally different. The People’s Republic of China is an authoritarian country; the Chinese Communist Party has been responsible for gross human rights violations for decades. There is nothing any liberal democratic society should even think about copying in the social credit system” underlines the Australian researcher.

The above and similar opinions shed light on the typical political background of the introduction of the system, which serves the purpose of not only keeping but also enhancing the authoritarian power of the CPC and the accomplishment of its long-term geostrategic goals. Any activities and statements that undermine the official party line concerning Taiwan, Hong Kong, or Xinjiang will automatically entail severe sanctions, including a significant drop in the SCS ranking and the resulting consequences (Denyer, 2016).



## Opposite opinions: in search of an understanding of the SCS concept

However, in the scientific space of Western countries, there are also opinions at least partly different from those mentioned, much closer to the Chinese views on the sense of implementing the SCS. The Chinese authorities emphasize that the system is not a “local invention” because people in other parts of the world have been subjected to similar solutions. In their opinion, in democratic countries, there are public monitoring networks, while online payment transactions or debit card payments are registered in internal bank systems. Like in China, IT experts can easily track anyone by their IP address, so the anonymity of Internet users is only illusory in most countries. According to them, various online servers located in Europe or the United States regularly monitor Internet traffic, and website owners analyze data, adapting content, images, advertising, and products to the interests of customers, who leave a so-called digital footprint. Registering on popular community sites, such as Facebook or Instagram, and communicators, like Twitter (X), WhatsApp, or Messenger, citizens often unwittingly agree to lose their anonymity and have their interests and viewpoints monitored by private corporations<sup>3</sup>. Analogical observations concern the start-up segment of the sharing economy, which is dynamically developing in the Western world. In the Sharing Economy peer-to-peer network system, companies use online platforms to connect people who have something to offer with people who need that exact thing. The sharing economy model primarily aims at young people who use mobile devices and those who value modern ICT solutions. Companies like Airbnb, Uber, Neighbor, Rover, Turo, JustPark, TaskRabbit, Lending Club, Poshmark, SitterCity, Kickstarter or CrowdMed, collect and process personal data about their clients and evaluate them under the adopted company procedure (Sharing Economy..., 2018).

From the Chinese cognitive perspective, the anonymity of Internet users on both sides of the Atlantic is thus only illusory. Hence, Chinese commentators ask why it provoked such outrage when China’s government explained this phenomenon to the public and whether it

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<sup>3</sup> Michał Kosinski, a Polish scientist from Stanford Graduate School of Business and the coordinator of the *myPersonality* project, is one of the creators of an algorithm that extremely precisely describes the personality model of each social media user based on their online activity. The algorithm has been used by, among others, Cambridge Analytica, the company that, without the users’ consent, obtained and took advantage of the personal data of almost 90 million people from Facebook. The resulting scandal gave rise to the debate on digital security and anonymity on the Internet. According to Kosinski, each of our activities on the Web leaves a digital footprint. The data, digital footprints, which we leave on the Internet, are then sent by appropriate algorithms and artificial intelligence, with the largest number of data gathered by algorithms originating from social media, such as Facebook, Twitter or Instagram. The traces Internet users leave on the Web allow us to accurately determine their ethnic origin, religious beliefs, political views and sexual preferences, or even appearance, intelligence level, and interests. This usually results in micro-targeting, i.e., sending diverse messages precisely suited to a specific person, which, however, may entail the threat of cybercrime, e.g., cyber extortion.



was just another instance of Western hypocrisy. In line with this view, China, contrary to other, only seemingly democratic states, decided to officially inform its citizens about the goals and principles of the system, and the SCS – at least for the time being – is voluntary and open.

Worth noting is the fact that this type of argumentation is, to a certain extent, understood and supported by other researchers, including European ones. Daithí MacSithigh and Mathias Siems, scholars from the Department of Law European University Institute, suggest in their paper that the Social Credit System should be seen as a specific instance of a wider phenomenon. Their paper is motivated by the fact that it cannot be assumed that *'what happens in China, stays in China'*. They argue that the SCS already applies to foreign workers and companies in China and possibly also to all 'overseas Chinese and ethnic Chinese' regardless of their place of residence. In addition, it can be observed that China's economic, political, and ideological influence leads to the general diffusion of Chinese law. Writings about China's Belt and Road Initiative, the 'Beijing consensus' of development assistance, and the impact of Chinese investments in Africa show that China's influence abroad is not merely of an economic nature but that it increasingly shapes law and policy elsewhere. In their opinion, it may, of course, be argued that the Social Credit System is something that should be seen not as a model but as a counter-model for other countries, but the reputation-based quantitative tools have become established in the West, not in China (Sithigh & Siems, 2019).

According to the quoted authors, many Western countries know financial consumer credit ratings and recent years have also seen the proliferation of rating systems in relation to online platforms and in the 'sharing economy', such as eBay, Uber, and Airbnb. As the 'sharing economy' or 'collaborative economy' has emerged as the latest Internet phenomenon (and business catchphrase) in recent years, the role of reputational systems is obvious. The sharing economy purports to be based on interpersonal relations and seeking an alternative to *'functional, cold and impersonal relations engendered by capitalism'* with authenticity and trust. Consequently, all major economy platforms, such as Uber, Airbnb, and TaskRabbit, and indeed precursors such as Couch Surfing, make use of the combination of scoring and feedback systems.

The success of e-commerce platforms, such as eBay and related sites, has also been attributed, in part, to how a platform has become 'trusted' by users and how well-understood information asymmetries are handled and countered. Trust in a sales platform is said to be the combination of payment security, reliable and affordable schemes for dispute resolution, and – of present interest – 'trust-building measures, like the mutual rating system which builds online reputation.' eBay's reputation system where buyers and sellers rate each other (with comments published for all to see), was added very shortly after it began business, in order to address the allegations of cheating; it became an established feature of the site and is still in operation.

Based on the described EUI Working Paper, this should not lead to the conclusion that the Social Credit System and its Western counterparts are incommensurable. Sithigh and

Siems argue that some aspects of the Chinese system are not part of the Western rating systems, yet they are not completely alien to the West. For example, the authors explained that, as China uses blacklists of persons who have violated the law to exclude them – with the help of data sharing – from many aspects of social life, we can relate this to the use of background checks and ‘no-fly lists’ in the US. Other instances include the system of control of football spectators in the UK (‘football banning orders’), which includes temporarily holding passports during relevant periods (international fixtures) to prevent travel. It can also be noted that criminal records and details of insolvent debtors are collected and may be shared more or less widely in several European states. The imposition of a criminal sentence can also incorporate a variety of sanctions in some Western countries. For example, temporary driving bans may be an ancillary penalty for criminal convictions, even if they do not relate to traffic offenses, and disenfranchisement may follow automatically from imprisonment (Wong & Dobson, 2019).

In Vincent Brussee’s view, the SCS is generally demonized in the West, being seen as a fully operative, digitized, and complete system. Meanwhile, according to this analyst from Merics, the SCS is fragmented and almost entirely driven by humans and low-tech digitization rather than AI. Three factors determine the pace at which the Chinese authorities adopt digital technologies. The first one is the political imperative: the greater the threat to regime stability, the more likely all actors will be aligned and funds available to realize quick adoption. Then comes the scope: the more factors that need to be tracked and integrated by an initiative, the more difficult actual implementation becomes. The last one is scale: the more regions and departments become involved, the greater the risk of fragmentation becomes. These factors explain why a complex, cross-sectoral, and inter-regional initiative like the SCS remains fragmented and digitized to a low degree, says (Brussee, 2021).

In addition to critics and supporters of the system, we also find researchers who have a symmetrical view of the sense of implementing the system. For them, without undermining whatsoever the weight and significance of the presented opinions it seems that the problem of the evaluation of the system implemented in China should be examined from different angles. On one hand, Chinese analogies and comparisons to the solutions applied by big tech companies, such as MAAMA (Microsoft, Apple, Alphabet, Meta, Amazon) or start-ups from the sharing economy segment, appear exaggerated and far-fetched. On the other hand, the West-European or American perspective of the problem may significantly differ from the Chinese or, more broadly, Asian viewpoint for several reasons. At the same time, it may misinterpret the motivations of the Chinese authorities. In their opinion, both diametrically different approaches do not have to be mutually exclusive; on the condition, however, that we can distinguish between the reason for implementing such solutions in China and the lack of justification and necessity of emulating them in other countries, especially liberal democracies and free-market economies. This aspect was highlighted by, among others, Leszek Slazyk. He argues that it is a total misunderstanding to impose certain universality on the SCS. This is not the nature of this system because it has been

rooted in the reality of Chinese society, which is significantly different from the Western world in terms of civilization and culture and has a different historical background. The SCS has been founded on the concept of a collectivist, patriarchal society, the phenomenon of “face” and the culture of “shame”, and the policy of *Gaige Kaifeng* (reform and opening up) – pursued from the 1970s – aimed at the economic growth, the improvement of the living standard and social promotion<sup>4</sup>.

Hence, Chinese people’s decisions are not entirely based on self-evaluation and thinking deep down, “in conscience”, about what is good and what is bad, useful and harmful, but, first of all, on the analysis of how a given behavior will be perceived and assessed by others, by the community one is accountable to. Improper behavior will lead to “losing face” and social condemnation, and, in extreme cases, exclusion, shame, and disgrace, which an average Chinese wants to avoid more than anything.

So-called ‘symmetrists’ emphasize that the proponents of the massive and mindless criticism of the SCS should remember that even studies carried out by experienced scholars who do not belong to the so-called Confucian cultural circle confirm that Chinese society strongly supports the ideas and solutions of the system. Genia Kostka, in her article, *China’s Social Credit Systems and Social Opinion: Explaining High Levels of Approval*, refers to interviews on the SCS conducted by the research group she headed among the citizens of the PRC. Her study reveals that as many as 76% of the respondents agreed with the government in Beijing that there is a problem of a lack of trust in Chinese society, but at the same time, they expressed their support for the SCS (Kostka, 2018). According to this acknowledged German researcher of the problem, the discussion on the pros and cons of the SCS fits into the debate on the dwindling space for developing civil society, the rule of law, the freedom of speech, investigative journalism, and religious beliefs in China. She also indicates that the CPC puts increasing pressure on the wider use of big data and artificial intelligence in social management. The findings of her study reveal, however, that the vast majority of Chinese people do not perceive digital monitoring systems as an instrument of repression and surveillance but they see them as a tool for improving the quality of life and filling in numerous institutional and regulative gaps in the state, which leads to desired, i.e., fairer

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<sup>4</sup> Maciej Meyer emphasizes that, in Chinese culture, the reputation and social status of a given person depends on “saving face” (*mianzi*). It is a concept that is close to what prestige or respect is in Europe, with one exception though. Face, just like money, can be lost, given, or taken. What are the elements that deserve special respect (thus, “giving face”) are wealth, intelligence, attractiveness, skills, social position, or good *guanxi* (especially with influential people). Face refers to one’s social profile rather than physical appearance. A given person is not an individual in the first place but is a group member and must be guided by the code of conduct strictly connected with the social role played. Among the Chinese, who have always been destined to cooperate with one another, constant “giving face” to neighbors, colleagues, and family has become a social norm. In China, you can “give face” to someone or “take face” from them. The general principle in the Middle Kingdom can be formulated as follows: “Give everyone their face, let no one lose their face, and make sure you save your face”. See: Meyer 2013; Meyer 2011; Meyer 2012.

and lawful behaviours of business and citizens. The results of Genia Kostka's research also reflect the problem of authoritarian government in China, although – what is interesting – the outcome is different than people in the West would imagine. The respondents were not really concerned about the fact that the system delivers personal data for the sake of social supervision and control. Many of them probably rightly assumed that the Chinese security apparatus has unrestricted access to all information of this kind anyway and it is only the form of this access that had been improved as the result of the Fourth Industrial Revolution.

However, the cited studies require some critical comment. It should be emphasized that the scale of the problem in the PRC and the western hemisphere countries is completely different. Those researchers highlight that in China, the restrictions affect millions of people, and in the US or UK, only a few are right. Even the eBay example is not universal. Other popular e – platforms like Instagram and ResearchGate have already announced to stop their point systems. In the UK, there is data protection, which does not allow the sharing of information (even criminal records) between different authorities (like law enforcement and traffic). Therefore, the above example presented by Síthigh and Siems should be considered more as an exception than a rule. In China, with the SCS, this is systemic, not occasional. Views popularized by Brussee may raise justified doubts as well. Every organization has a SC-ID number, and everybody can access the popular website [chinacredit.gov.cn](http://chinacredit.gov.cn) to search for any organization or the full names of blacklisted people. It is fully implemented and works quite smoothly. Fragmentation plays a minor role, e.g., if somebody compares regional SCS versions (e.g., Rongcheng, Shanghai Score, etc.) or private versions (e.g., Sesame Credit Score). Also, the regional SCS scores do not prevent from being part of the general SCS score. Even respected Genia Kostka's findings have been countered by other surveys, showing much less approval for SCS. In general, most surveys in China do not happen in a free setting. In authoritarian states, surveys may not give true results, as citizens are usually afraid to express their opinions. In addition, the social disapproval was extremely visible with the massive public protest in Shanghai, the financial hub, on November 27, 2022. Protests against China's heavy COVID-19 curbs spread to more cities nearly three years into the pandemic.

The vast majority of Western analysts and commentators agree that the above-mentioned analogies and comparisons to the West are definitely exaggerated in terms of the scale of the phenomenon, the tools applied, and, particularly, social costs. Answering the question of whether the SCS is not, in fact, the same idea for collecting and using personal data as – so popular in the West – social media, sales platforms, or the sharing economy, Hong (2017) noted in “The Wired”: “Imagine a world where many of your daily activities were constantly monitored and evaluated: what you buy at the shops and online; where you are at any given time; who your friends are and how you interact with them; how many hours you spend watching content or playing video games; and what bills and taxes you pay (or not). It's not hard to picture because most of that already happens, thanks to all those data-collecting

behemoths like Google, Facebook, and Instagram or health-tracking apps such as Fitbit. But now imagine a system where all these behaviors are rated as either positive or negative and distilled into a single number, according to rules set by the government. That would create your Citizen Score, and it would tell everyone whether or not you were trustworthy. Plus, your rating would be publicly ranked against that of the entire population and used to determine your eligibility for a mortgage or a job, where your children can go to school – or even just your chances of getting a date” (Hong, 2017).

### **Zero-COVID policy: Controversy over the SCS effectiveness**

For some analysts, the only serious inspiration to emulate the selected elements of the system is the Chinese government’s high efficacy in combating the SARS-Cov-2 pandemic. Adam Knight and Rogier Creemers from Leiden University are proving that the SCS measures were used quickly in the fight against the virus. In their diagnosis, ultimately wrongly as it turned out, they focused on the Shanghai example in which, in February 2020, the local government published a piece of legislation outlining the municipality’s approach to pandemic prevention. This included provisions for Shanghai’s SCS to be deployed as an enforcement mechanism to control a range of COVID-related behaviors such as quarantine avoidance or the concealment of one’s medical or travel history. In addition to being punished through regular legal channels, Shanghai’s blacklisting system meant that offenses would also be appended to an individual’s credit record and made public online through the Shanghai Public Credit Information Platform. Shanghai was not alone in taking such action. Systems nationwide published examples of individuals or businesses falling foul of the new rules. But punishment through black-listing has been only one-half of the social credit equation. The SCS was redeployed to not only enforce new COVID-related regulations, but also reward certain behaviors deemed constructive in the fight against the virus. In Anshan, as in many local schemes, activities such as donating materials or funds, volunteering on the front line, or reducing rent for small businesses were honored through red-listed status. According to researchers, from the CCP perspective, the response to COVID-19 proved an important test case for a SCS (Knight & Creemers, 2021).

The technological dimension of the problem is also worth noting. On a broad spectrum, the pandemic made Chinese policymakers aware of the absolute need to continue supporting scientific research on new technologies, including AI and the other components of the Fourth Industrial Revolution, especially Augmented Reality (AR). Indeed, thanks to the application of modern AI-based solutions, especially COVID-19 contact tracing apps (CTAs), the authorities contained the pandemic focussed on moving the economy back on the fast track of economic growth. In the battle against coronavirus, China extensively used state-of-the-art technological solutions. Just after the pandemic broke out, the system of video surveillance of citizens “Video Surveillance System”, was supplemented with the algorithm of human body temperature recognition algorithm. When coupled with the software made

by Chinese Sense Time (the leader in the world research into AI), it helped to find out with a high degree of certainty whether a given person had been infected with the virus. The fact is that owing to the advanced face recognition technology – which now, thanks to AI startup Watrrix, identifies people even when they wear a mask or baseball cap – the Chinese sanitary services were able to easily detect infected citizens or find people with increased body temperature and send them to tests immediately.

People in quarantine were also monitored, and draconian penalties were imposed on those who violated the rules. Artificial intelligence helped significantly in the swift diagnosis of the disease. AI algorithms enabled the quick analysis of CT scans of patients waiting to be diagnosed in Wuhan hospitals. The monitoring system Alipay Health Code (AHC) was also implemented. Owing to the use of big data, it checked how likely a given person was to become infected with the virus based on his or her previous behaviors and the places he or she had visited. It proved to be very efficient in Zhejiang province, which is famous not only for the high living standard of its residents, innovative companies, and very good universities, including Zhejiang University (Zheda), but also for the extensive use of modern digital technologies on a day-to-day basis<sup>5</sup>.

The last element significantly facilitated the functioning of the AHC system. Based on collected data, residents were assigned the respective color (red, yellow, or green), which determined whether a given person could remain in a public space or whether he or she had to be quarantined. Citizens could check their status using a very popular app, such as Alipay or WeChat. Not only did cutting-edge technologies help monitor and forecast the development of the pandemic in China, but they also turned out to be useful in developing

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<sup>5</sup> COVID-19 CTAs dictates whether an individual should be quarantined. Chinese citizens in 200 cities, beginning with Hangzhou, were required to install the Alipay Health Code app on their smartphones. The application was developed by Hangzhou's local government with the help of Alipay owner Ant Financial. After users fill in a form with personal information including name, national ID number, contact information, and details of recent travel, the software generates a QR code in one of three colours. Whereas the green code gave users unhindered access to public spaces, the yellow code indicated that the person might have come into contact with a person with COVID-19 infection and therefore had to be confined to their homes or an isolation facility. The red code was assigned to users infected with the virus. As public spaces like shopping malls can only be accessed with a green QR code, the installation of the health code app became to all intents and purposes mandatory in China, resulting in the broad adoption of the app among Chinese citizens. More: China: Alipay Health Code app shares data with law enforcement, 1 March 2020 <https://privacyinternational.org/examples/3433/china-alipay-health-code-app-shares-data-law-enforcement>; *In Coronavirus Fight, China Gives Citizens a Color Code, With Red Flags*. A new system uses software to dictate quarantines — and appears to send personal data to police, in a troubling precedent for automated social control, The New York Times <https://www.nytimes.com/2020/03/01/business/china-coronavirus-surveillance.html>. The various digital solutions China has used are also analysed by the Merics study: China Monitor Report Tracing. Testing. Tweaking. Approaches to data-driven Covid-19 management in China, Jun 24, 2020 <https://merics.org/en/report/tracing-testing-tweaking>.



vaccines. Owing to them, the full, unprecedented and effective isolation of Wuhan agglomeration and the entire 60-million province of Hubei was planned and implemented, which would be unfathomable in any other part of the world. In the first weeks of the pandemic, two additional hospitals for infectious diseases were built in Wuhan at an express pace, which aroused unmistakable admiration among millions of Internet users watching the investment in live mode.

The first of them – Huoshenshan – was built from scratch in only ten days! The volume, momentum, and rapid progress of construction work once again showed how enormous the material, scientific, and technological resources of the Middle Kingdom are and how effectively the country can use them. China commissioned a new, 1000-bed hospital in Wuhan, the center for the coronavirus pandemic, on 3 February 2020. The Huoshenshan hospital is a quarantine hospital designated to treat coronavirus patients with enhanced care (Huoshenshan Hospital, 2020).

Just a year later, in March 2021, the authorities proudly announced to the world that the pandemic on the territory of China was over. However, the reality was different. The following months proved this type of statement had a strong propaganda character. In the spring of 2022, a new virus variant appeared in Shanghai. As a result, the Zero-COVID strategy adopted by the authorities has aroused much controversy worldwide. While many countries relied on vaccination and improved treatments, China had stuck to a policy of lockdowns and other restrictions. The fact is that China was seen as an example of a country handling the virus relatively successfully at the start of the pandemic. But later, the WHO pointed out that the Omicron variant spreading across China in 2022 transmitted more easily than other variants and said China should rethink its strict Covid strategy to halt the spread of the virus (Wanyuan, 2022).

## Conclusions

Currently, China has no single, cohesive, and fully digitized system of citizen ratings. However, the emergence of a single system was not the main goal of the country's authorities. SCS functions nationwide and is fully operable. Every citizen can easily check his ranking in any functioning database. Theoretically, SCS primarily focuses on assessing enterprises and enforcing the rule of law rather than evaluating citizens, but practice proves the opposite. So far, penalties have significantly outweighed loyalty benefits. The other attitudes and behaviors are prohibited and face severe sanctions. The whole system is under the political doctrine of the CCP consolidating its increasingly authoritarian power. There are no free political elections in China, and it is very difficult to prove whether this type of project, like SCS, is the result of real social expectations or just another authoritative requirement imposed by the government. Public opinion polls on the issue of support of the Chinese public for the ideas and principles of the SCS show different results here. Social surveys lead to non-democratic regimes that often do not reflect citizens' true views and opinions.



There is no doubt that many Chinese are also critical of the system's rules, although effective censorship and severe punishments do not make it easier for them to express opinions freely and publicly. The massive and spontaneous protests in Shanghai and other Chinese cities in 2022 were the best evidence of this social discontent.

Among renowned researchers, opinions on the SCS's effectiveness and the advisability of its implementation in the PRC are divided. However, critical voices prevail. The social, economic, political, and cultural Chinese perspective is, however, significantly different from the European one. EU members and its citizens have the full right to reject the Chinese solutions, opposing all ways and forms of spreading them in the system of liberal, let alone deliberative, democracy. However, the conviction that the ideals and values of liberal democracies and free market economies can be universally applied in a different social, political, and economic model, such as the Chinese one, is as worth attention and respect as unrealistic or even illusory. From the perspective of the patriarchal, collective and hierarchical Chinese society, based on Confucian values, despite some doubts and controversies, such solutions like SCS may be useful and gain some social approval. It is hard to estimate how much this acceptance is due to widespread censorship and self-censorship in Chinese daily behavior (Musiałek, 2010; Yao 2009; Avanzini, 2004; Zwoliński, 2007). For a long time, the biggest economic importance for the Chinese were collectivism and long-term orientation. However, the market transformation initiated by the 1978 reforms, when Deng Xiaoping introduced the concept of the socialist market economy, changed this picture. Masses of Chinese show individualism, sometimes even extreme selfishness, which the SCS is supposed to counteract. How effective and desirable this project is remains a separate problem.

The use of the tools of the Fourth Industrial Revolution in social management in cultural and economic settings other than Confucianism must be recognized as multidimensionally harmful and unacceptable as well. Moreover, the SCS is a unique Chinese solution rather than a creative extension of digital practices applied in the West for years. This does not mean that similar practices – concerning selected consumer activities and social communication in the Internet network – are absent. From the technological point of view, the tools applied are alike, but the objectives, scale, and, most importantly, social consequences are different. Thus, digital solutions implemented in China within the framework of the SCS cannot be equated with the activities of technological giants like MAAMA (formally GAFA) and similar projects in the countries of liberal democracy led by Europe and the United States. It should be regarded as highly harmful and undesirable to emulate the SCS solutions in the EU, the US, and many other liberal democracies with the D-10 group at the head.

At the same time, in exceptional circumstances and under strictly defined rules, the application of digital tools in social management could be acceptable. Some SCS tools proved efficient in China after the COVID-19 pandemic broke out, which may constitute a future reference point in Europe regarding the more effective care of citizens' health security. More and more countries in the world, also in the EU area, have installed CCTV surveillance cameras with face recognition technology, and it seems society would approve

of the extension of the catalog of digital tools used there, exceptionally. Thus, although the countries of the West believe that the SCS principal solutions are, by definition, detrimental to the fundamental civil rights and liberties (including the freedom of expression and the right to privacy), it cannot be ruled out that some elements modeled after the SCS, e.g., those strengthening public security (especially health security), will be used in future in exceptional circumstances, not as in China, where the solution is systemic. After all, Taiwan and Singapore have maximized the benefits of data-driven solutions even better than the PRC. In those democratic countries, app usage was often mandatory. However, clear legal restrictions were applied, and on – and offline measures were communicated actively and transparently. The liberal democratic systems that characterize the EU or US, do not have to be in retreat. They can effectively, but differently than in the PRC, use selected digital tools for economic and social purposes in the framework of democratic legal control.

All reasonable doubts about the SCS application should give food for changes in legal regulations to political decision-makers in the EU member states, especially those political and scientific circles that assume that the Chinese growth model can be – at least partly – copied only in underdeveloped African, Latin American, Central Asian and other undemocratic countries (including South Korea, the Russian Federation and the Islamic Republic of Iran ), which understand and support this form of exercising authority. It should be remembered that Lin Junyue, recommends the SCS also for France and other developed countries. He says Cambodia, Sri Lanka, Chile, and Poland have even signaled interest. While verifying this thesis is difficult, the belief that the Old Continent will remain entirely free from such social management methods can be delusional. China has not hidden its ambition of exporting its system to EU Member States. But it must be obvious that such a solution will always result in a loss of freedom and should be illegal in the European Union.

China, with its model of growth, multidimensionally impacts selected European states and their political elites, focusing on those groups that are disappointed with the liberal and democratic form of governance and with the free market rules. The Belt and Road Initiative and the accompanying various political, economic, and propaganda activities are aimed not only at strengthening Chinese influence in Europe but also, somehow “by the way,” at disseminating and domesticating other elements of the Chinese development paradigm, including digital tools. The examples of Hungary, Serbia, Belarus, and Poland (Pegasus spyware affair), and several African countries in particular are meaningful here<sup>6</sup>. Therefore,

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<sup>6</sup> Africa has longstanding and deep partnerships with Chinese technology companies—Huawei famously began developing its telecommunications networks in rural Kenya in the 1990s. Today, African governments are among the top customers for Chinese surveillance tools, from “smart cities” to media monitoring. However, these partnerships have come under increased scrutiny and criticism for two main reasons: domestic human rights abuses committed with the help of surveillance tech in China, and the allegations of government spying. Companies like Huawei or Alibaba have also started to offer communication and diagnostics work with hospitals and health authorities in Italy and France. That’s why European governments should ensure that personal health data of European citizens are stored in EU-based

a regulation passed by the European Commission must prevent such digital tools from being implemented in Europe in the future. EU action should be in line with the UNESCO agenda. In November 2021, the 193 Member States at UNESCO's General Conference adopted the Recommendation on the Ethics of Artificial Intelligence, the first global standard-setting instrument on the subject. It will not only protect but also promote human rights and human dignity, and will be an ethical guiding compass and a global normative bedrock allowing to build strong respect for the rule of law in the digital world (UNESCO, 2021).

The European Union integration project is rather an opportunity than a guarantee to ensure “peace, democracy, security, human rights, and prosperity” (Molle, 2006). Moreover, the European Union continues to act as a “normative power” through which its role, identity, and foreign policy are defined. Its power is based on the universal significance of the ideas, norms, and values underlying the European integration project (Skolimowska, 2015). The EU also sets standards for the various areas of the global economy, exporting its norms and standards worldwide. The EU's experience can also be useful in dealing with the challenges raised by the globalization process. The Union's potential allows for exerting more influence through soft power methods: persuasion, dialogue, transparency, and development aid (Borkowski & Zamecki, 2012). Of course, in some EU Member States, a shift from traditional constitutional democracy to national populism and so-called unconsolidated (hybrid) democracy is noticeable. But the axiological basis of the EU is still the strong conviction that liberal democracy, free market, and the rule of law, much better than authoritarian regimes and dictatorships, express human dignity. It seems unlikely the European system of ideas, rules, and values will be transplanted to China in a predictable perspective. Similarly, a potential attempt to transfer the Chinese SCS digital model to the European reality, with very few exceptions, seems to be useless and harmful.

## References:

- Avanzini, F. (2004). *Religie Chin*. Wydawnictwo WAM.
- Bashir, E. (2021, May 5). *AI regulation: analysis of the European Commission proposal for a legal framework on artificial intelligence*. [https://www.cullen-international.com/news/2021/05/AI-regulation--analysis-of-the-European-Commission-proposal-for-a-legal-framework-on-artificialintelligence.html?gclid=EAIaIQobChMI5M\\_Ugp3j9QIVCwWiAx1TrguqEAAAYAiAAEgIoLPD\\_BwE](https://www.cullen-international.com/news/2021/05/AI-regulation--analysis-of-the-European-Commission-proposal-for-a-legal-framework-on-artificialintelligence.html?gclid=EAIaIQobChMI5M_Ugp3j9QIVCwWiAx1TrguqEAAAYAiAAEgIoLPD_BwE)
- Borkowski, J., & Zamecki, Ł. (2012). *Relacje Unia Europejska – Chińska Republika Ludowa. Uwarunkowania wewnętrzne i międzynarodowe*. Aspra.

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data centres. Otherwise, if Chinese companies transfer personal data to China, i.e., under the EU's standard contractual clauses, privacy protection can't be ensured. More: Jili Bulelani, *Chinese surveillance tech in Africa*, Dec 22, 2021, <https://merics.org/en/podcast/chinese-surveillance-tech-africa-jili-bulelani>; China Monitor Report *Tracing. Testing. Tweaking. Approaches to data-driven Covid-19 management in China*, Jun 24, 2020 <https://merics.org/en/report/tracing-testing-tweaking>.

- Brussee, V. (2021, August 13). *China's digital paradox*. <https://merics.org/en/opinion/chinas-digital-paradox>
- China Monitor Report: Tracing. Testing. Tweaking. Approaches to data-driven Covid-19 management in China*. (2020, June 24). <https://merics.org/en/report/tracing-testing-tweaking>
- China's social credit score – untangling myth from reality*. (2022, February 11). <https://merics.org/en/opinion/chinas-social-credit-score-untangling-myth-reality>
- Chin, J., & Won, G. (2016, November 28). China's New Tool for Social Control: A Credit Rating for Everything. *The Wall Street Journal*. <https://www.wsj.com/articles/chinas-new-tool-for-social-control-a-credit-rating-for-everything-1480351590>
- Czajkowski, P. (2019, February 26). *Chińczycy uruchomili nową wersję systemu rozpoznającego osoby po chodzie*. Ithardware. [https://ithardware.pl/aktualnosci/chinczycy\\_uruchomili\\_nowa\\_wersje\\_systemu\\_rozpoznajacego\\_osoby\\_po\\_chodzie-8729.html](https://ithardware.pl/aktualnosci/chinczycy_uruchomili_nowa_wersje_systemu_rozpoznajacego_osoby_po_chodzie-8729.html)
- Denyer, S. (2016, October 22). China's plan to organize its society relies on 'big data' to rate everyone. *The Washington Post*. [https://www.washingtonpost.com/world/asia\\_pacific/chinas-plan-to-organize-its-whole-society-around-big-data-a-rating-for-everyone/2016/10/20/1cd0dd9c-9516-11e6-ae9d-0030ac1899cd\\_story.html](https://www.washingtonpost.com/world/asia_pacific/chinas-plan-to-organize-its-whole-society-around-big-data-a-rating-for-everyone/2016/10/20/1cd0dd9c-9516-11e6-ae9d-0030ac1899cd_story.html)
- Hoffman, S. (2018). Managing the State: Social Credit, Surveillance and the CCP's Plan for China. In *AI, China, Russia, and the Global Order: Technological, Political, Global, and Creative Perspectives A Strategic Multilayer Assessment (SMA) Periodic Publication*. [https://nsiteam.com/social/wp-content/uploads/2018/12/AI-China-Russia-Global-WP\\_FINAL.pdf](https://nsiteam.com/social/wp-content/uploads/2018/12/AI-China-Russia-Global-WP_FINAL.pdf)
- Hong, K. (2017). *Big data meets Big Brother as China moves to rate its citizens, The Chinese government plans to launch its Social Credit System in 2020. The aim? To judge the trustworthiness – or otherwise – of its 1.3 billion residents*. <https://www.wired.co.uk/article/chinese-government-social-credit-score-privacy-invasion>
- Huoshenshan Hospital, Wuhan*. (2020, February 9). Hospital Management. <https://www.hospitalmanagement.net/projects/new-coronavirus-hospital-wuhan/>
- Knight, A., & Creemers, R. (2021, January 20). *Going Viral: The Social Credit System and COVID-19*. DOI: 10.2139/ssrn.3770208
- Kobie, N. (2019). *The complicated truth about China's social credit system*. <https://www.wired.co.uk/article/china-social-credit-system-explained>
- Kostka, G. (2018, July 23). *China's Social Credit Systems and Public Opinion: Explaining High Levels of Approval*. Freie Universität Berlin. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3215138](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3215138)
- Kostka, G., & Habich-Sobiegalła S. (2021, March 5). *Covid-19 contact tracing apps: why they are so popular in China*. <https://merics.org/en/short-analysis/covid-19-contact-tracing-apps-why-they-are-so-popular-china>
- Louvet, S. (2020, April 21). *Überwacht: Sieben Milliarden in Sicht*. Arte Doku. <https://www.arte.tv/de/videos/083310-000-A/ueberwacht-sieben-milliarden-im-visier/>
- Meyer, M. (2011). Kulturowe uwarunkowania marketingu na rynku chińskim. *Marketing i Rynek*, 4.
- Meyer, M. (2012). Problematyka kulturowa w naukach ekonomicznych. *Oeconomia Copernicana*, 4.
- Meyer, M. (2013). *Znaczenie kultury i instytucji dla gospodarki ChRL*. CeDeWu.
- Moll, J. (2018). *Chiny wprowadzają obywatelom oceny za życie, które będą świadczyć o nich i ich pozycji społecznej*. <http://zmiany.naziami.pl/wiadomosc/chiny-wprowadzaja-obywatelom-oceny-za-zycie-ktore-beda-swadczyz-o-nich-i-ich-pozycji>
- Molle, W. (2006). *The Economics of European Integration. Theory, Practise, Policy*. Fifth edition. Burlington.

- Musiałek, A. (2010). Konfucjanizm. *Krakowskie Studia Międzynarodowe*, 3.
- Pohlmann, M. (2018, February 9). George Orwell in China – Digitization as a Method of Total Social Control. heigOS – Heidelberg Research Group for Organization Studies. Heidelberg University. <https://heigos.hypotheses.org/8546>
- Proposal for a Regulation of the European Parliament and of the Council Laying Down Harmonised Rules on Artificial Intelligence (Artificial Intelligence Act) and Amending Certain Union Legislative Acts. (2021, April 21). Brussels. COM (2021) 206 final 2021/0106 (COD) {SEC(2021) 167 final} – {SWD(2021) 84 final} – {SWD(2021) 85 final}.
- Report of the Social and Human Sciences Commission (SHS) Title Report of the Social and Human Sciences Commission (SHS) Title full Report of the Social and Human Sciences Commission (SHS) Conference UNESCO. General Conference, 41<sup>st</sup>. (2021). <https://unesdoc.unesco.org/search/N-EXPLORE-674ce62a-d8d6-4d45-99f1-bd9218c36ad9>
- Sharing Economy Pioneers: 15 Companies Disrupting Industries Left And Right*. (2018, October 1). <https://www.neighbor.com/storage-blog/sharing-economy-pioneers/>
- Shead, S. (2021, April 16). EU to consider ban on using A.I. for mass surveillance and social credit scores. <https://www.cnn.com/2021/04/15/eu-considers-ban-on-ai-for-mass-surveillance-social-credit-scores.html>
- Sithigh, D.M., & Siems, M. (2019, January). *The Chinese Social Credit System: A Model for other Countries?* European University Institute Department EUI Working Paper LAW.
- Skolimowska, A. (2015). *Normatywna potęga Unii Europejskiej w obliczu międzynarodowych konfliktów wewnętrznych*. Elipsa.
- Ślęzyk, Ł. (2018, March 25). *System oceny społecznej albo kolejne nieporozumienie*. <https://chiny24.com/spoleczenstwo/system-oceny-spoecznej>.
- State of EU-China relations*. (2018, September 12). European Parliament resolution of 12 September 2018 on the state of EU-China relations, European Parliament 2014-2019. Texts adopted P8\_TA(2018)0343 (2017/2274(INI)). [https://www.europarl.europa.eu/doceo/document/TA-8-2018-0343\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/TA-8-2018-0343_EN.pdf)
- Schaefer, K. (2019, October 14). *The apps of China's social credit system*. <https://ub.triviumchina.com/2019/10/long-read-the-apps-of-chinas-social-credit-system/>
- Szewerniak, M. (2018, September 14). *Chiny wprowadzają System Zaufania Społecznego*. <https://gdpr.pl/chiny-wprowadzaja-system-zaufania-spoecznej>
- The European Union Chamber of Commerce in China [in cooperation with Sinolytics] publication: *The Digital Hand: How China's Corporate Social Credit System Conditions Market Actors*. [https://www.eurochamber.com.cn/en/publications-archive/709/The\\_Digital\\_Hand\\_How\\_China\\_s\\_Corporate\\_Social\\_Credit\\_System\\_Conditions\\_Market\\_Actors](https://www.eurochamber.com.cn/en/publications-archive/709/The_Digital_Hand_How_China_s_Corporate_Social_Credit_System_Conditions_Market_Actors), 2019-08-28
- Tiezzi, S. (2021, March 4). *What Is the CPPCC Anyway? Your guide to the Chinese People's Political Consultative Conference, just in time for its annual session in Beijing*. <https://thediبلوماس.com/2021/03/what-is-the-cppcc-anyway>
- Vincent, J. (2021, April 14). *The EU is considering a ban on AI for mass surveillance and social credit scores Leaked regulation suggests strong new laws on AI uses*. <https://www.theverge.com/2021/4/14/22383301/eu-ai-regulation-draft-leak-surveillance-social-credit>
- Wanyuan, S. *China: Why is the WHO concerned about its zero-Covid strategy?* <https://www.bbc.com/news/59882774>
- Wardęga, J. (2015). *Współczesne społeczeństwo chińskie. Konsekwencje przemian modernizacyjnych*. Wydawnictwo Adam Marszałek.

- Why One Cybersecurity Firm Says China Has Soured on Conventional Hacking. (2016, April 21). *The Wall Street Journal*. <https://www.wsj.com/articles/BL-CJB-29069>
- Woesler, M., Warnke, M., Kettner, M., & Lanfer, J. (2019). The Chinese Social Credit System: Origin, political design, exoskeletal morality and comparisons to Western systems. *European Journal of Chinese Studies*, 2, 7–35. [http://universitypress.eu/9783865152992\\_002.pdf](http://universitypress.eu/9783865152992_002.pdf)
- Wojciechowska, G. (2021, May 24). *Social Credit System – inteligentny panoptikon z chińską charakterystyką czy sposób na zbudowanie społeczeństwa przyszłości?* Instytut Boyma. <https://instytutboyma.org/pl/social-credit-system-inteligentny-panoptikon-z-chinska-charakterystyka-czy-sposob-na-zbudowanie-spoleczenstwa-przyszlosci/>.
- Wong, K., & Dobson, A. (2019). We're just data: Exploring China's social credit system in relation to digital platform rating cultures in Westernised democracies. *Global media and China*, 4(2).
- Yao, X. (2009). *Konfucjanizm. Wprowadzenie*. Wydawnictwo Uniwersytetu Jagiellońskiego.
- Zwoliński, A. (2007). *Chiny – historia, teraźniejszość*. Wydawnictwo WAM.