

Digital Europe Programme

— Feedback on the public consultation on the draft orientations for the Draft Orientations for the preparation of the workprogramme(s) 2021-2022

“To ensure that no further pockets of inequalities are created, and digital innovation delivers tangible benefits to people’s lives, EuroHealthNet calls for better addressing and mainstreaming of equity and social inclusion matters in the Draft Orientations for the preparation of the work programme(s) 2021-2022.”

EuroHealthNet welcomes the initiative to establish the Digital Europe programme to support digital transformation in the EU. Digital technologies offer new opportunities to strengthen – in a balanced way - the public and private sector, and they are crucial to ensure sustainability, growth and equity in the EU. Digital innovation can bring new opportunities to transform health systems, including new approaches to health protection and promotion, treatments and care, accelerated scientific progress for early diagnosis, and prevention of diseases. Importantly, new digital technologies can contribute to reducing inequalities, by lowering costs, expanding coverage and improving access to and quality of public services, such as health, social protection and education.

However, fast developments in the field of digital transformations and their impact on our societies comes along with significant risks of widening inequalities if design and implementation disregards important factors including access, effectiveness or safety. To ensure that no further pockets of inequalities are created, and digital innovation delivers tangible benefits to people’s lives, EuroHealthNet calls for better addressing and mainstreaming of equity and social inclusion matters in the Draft Orientations for the preparation of the work programme(s) 2021-2022. To this end, **we suggest the following new ‘deployment sector’ to be added to the document: Digital for an equitable, resilient and sustainable society.** This would consist of a dedicated focus on the use of digital technologies to foster social inclusion/cohesion, especially in consideration of the positive impact that digitalisation would have on the society as a whole as well as in terms of human capital and productivity. Furthermore, we recommend to better integrate the concept of equity in all the ‘deployment sectors’ as well as in the areas of focus of Digital Europe.

In addition, digital literacy activities should target a wider public. The effective digital transformation of public services can only be achieved if everyone benefits from it and no one is left behind. New digital technologies insufficiently account for varying abilities. In many cases, the dominant assumption is that users are a rather homogenous group with similar needs, comparable means and equivalent competences. In reality though, people’s level of digital literacy is shaped by economic, environmental, cultural, and societal factors. The Digital Europe programme addresses issues of literacy through empowering digital

skills of professionals and fostering digital learning of employees and in schools. However, certain vulnerable groups, such as older people and people facing socioeconomic disadvantage, may still not benefit from these programmes. We therefore recommend to ensure that digital literacy is promoted further amongst a broader public.

Finally, as our **“Analysis of the Multiannual Financial Framework 2021- 2027 from a health and health equity perspective” stresses, we recommend to:**

- Approach issues of Artificial Intelligence (AI) with caution. AI can be an effective support for health and care services, but should not replace human inputs, which are necessary for optimum health and wellbeing, in particular mental health.
- We appreciate that it is made explicit that access to Common European data spaces from both the public and private sector should be done in a conforming, lawful, ethical and trusted manner. Safety measures and regulation should protect the misuse of personal data, and in particular health data. The health sector is characterised by many global and non-health actors where motivations behind innovations are often related to profit rather than altruistic public health impacts. Effective, accountable safeguards for individual privacy must be guaranteed.
- Be explicit about secure and safe use of new digital technologies as means to greater effectiveness of the programme. Trust should be built starting with the most vulnerable to ensure that digital innovation reaches everyone equally. The proposed member state co-investment model may result in significant variations in effectiveness, as well as widen gaps between Member States and regions.
- Ensure literacy in the list of ‘advanced digital skills’. Digitising the public sphere, including the health and care sector, risks widening (health) inequalities by limiting access to health and social protection systems, especially amongst older people and lower socioeconomic groups. It is important to look beyond those ‘immediate’ digital skills referenced in the Draft Orientations to consider the public need for improved health literacy in general, which will reduce health inequalities.
- Ensure accessibility in ‘interoperability and digitising the public sector’ section. To ensure wholesale uptake of digital services, accessibility should be placed at the centre, not only in the sense of remoteness but also in respect of socio-economic conditions, capacities, and capabilities



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