EuroHealthNet welcomes the consultation towards a Roadmap for the EC Communication on this subject. The collaboration between DGs CONNECT and SANTE is particularly important; however this should be
Extended to ensure cohesion with other relevant DGs and EU instruments such as the EU Semester processes and the potential EU Pillar of Social Rights. Mention of the need to address health inequalities is welcome; however this is potentially both a key positive and negative factor and should be more prominent. Since the 2009 Communication Solidarity in Health it is increasingly recognised that health inequalities cost EU governments significantly: they reduce people’s ability to contribute to society, undermine economic growth and prosperity, and increase health, social care and wider public expenditures.

Digital technologies do offer new opportunities to transform health care systems, including new approaches to personalised prevention, treatments and care, independent living, integrated health and social care, accelerated scientific progress for early diagnosis and prevention of diseases. However, there are significant risks and obstacles of inequitable implementation including safety, access, effectiveness and authority.

KEY ROLE IN HEALTH PROMOTION

EuroHealthNet welcomes the recognition that digital health tools and processes can play a transformative role in health promotion for European citizens. For instance, mHealth has the potential to prioritise integrated health promotion, disease prevention, provision of care and monitoring for people from vulnerable groups; thereby reducing health and social inequalities. Emerging technologies can further empower patients and carers by giving them more control over and understanding of their health. Conversely, unregulated digital innovation risks widening health inequalities by limiting access according to wealth of states, societies, systems or individuals, especially older people among the 20% of citizens not digitally literate even by the most optimistic forecasts.
TRUST IS IMPERATIVE
Protection of personal data, cross border patient rights and electronic identification are crucial elements to clarify and flag for citizens as well as health and social care professionals in order to encourage a Single Digital Market where health and care is sustainable and effective. The rise of new global actors raises serious questions of systematic and individual rights, benefits, transferability, transparency, interoperability, security and ownership. Innovation must be balanced with a precautionary principle. EuroHealthNet welcomes the Roadmap recognition of wide stakeholder involvement and urges that public health stakeholders, including health workforce professionals, authorities, researchers and civil society in social, cultural and demographic fields are properly involved. Digital Health Single Market instruments should be carefully aligned with the EU Pillar of Social Rights, the UN Sustainable Development Goals and other global standard data protection measures for citizens.

ACCESS FOR ALL
Greatly improved literacy and technical skills, including digital and health literacy for all, are vital for citizens, providers and professionals to avoid widening health inequalities within and between states. How to achieve this should be a feature of the Roadmap and Communication. Digital health technologies are a means to a goal, where health and wellbeing are set out in the TEU objectives. The proximate relationship to the health professional or caregiver should not be substituted for only digital solutions; patient choice is fundamental. Providers also need to understand sensitive matters regarding mental and physical wellbeing, before proposing applications, to avoid harmful unintended consequences.

With those above caveats EuroHealthNet welcomes the EC Roadmap aims and will be interested to contribute towards their progress and development.
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