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# Public Consultation on the Draft Global Strategy on Digital Health

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| Date submitted |
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| 03.05.2019 15:54:07 |
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## General information

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| These comments represent input from a WHO Member State (Permanent Missions or Ministries) |
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| No [N] |
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| These comments represent the views of an: |
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| Organization [A2] |
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| Name of Organization |
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| EuroHealthNet |
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| Organization type |
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| Not-for-profit organization [3] |
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| Organization type [Other] |
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Please input your comments and suggestions (such as additions or removal of concepts or text) for each section below.

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| <b>Purpose and Global Situation</b> |
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| Do the Purpose and Global Situation sections clearly outline the purpose of the Strategy and provide a clear background and rationale? |
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| No [N] |
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If NO, please explain

In a context of large and persistent health inequalities between and within countries, digital health should be seen as a means of closing the health gap by improving equity, affordability and accessibility of health-enhancing services and practice. Accounting for fair distribution of opportunities, health and social well-being outcomes across social gradients in our societies should be put central to this endeavor. Digital health is changing the way health systems are run, how health and care are co-created and delivered across populations. As any other paradigm in the health field, it should not leave inequalities factor unchecked. 2. Indeed, risks associated with jeopardising equity are not highlighted enough through the strategy's text. While digital health can improve sustainability and quality of health systems, it also can generate health inequalities. Digital health can benefit individuals only if they are in a position to access it, afford it, comprehend and utilise the knowledge gained properly (health literacy factor). Exclusion can reduce or nullify the benefits of Digital Health on health systems due to its negative impact on vulnerable groups, namely older people and low socio-economic population. Furthermore, the strategy risks being perceived as not central to how the world of delivery and co-creation of health has been already transforming itself. It's rather behind digital, commercial, corporate and professional developments in the field. This should be clearly described in the Global Situation section of the document.

VISION STATEMENT: Improve health for everyone, everywhere by accelerating the adoption of Digital Health

Is the Vision Statement clear and comprehensive?

No [N]

If NO, please explain

It is disappointing to notice that the Vision section of the Global Strategy on Digital Health missed out on making any reference to Digital Health Literacy. Given the pace and extent of the digital innovation in and transformation of the health sector (and society at large), Digital Health Literacy is a critical element of any strategy of such ambition. This indeed is not only crucial for users but also for professionals who often struggle to keep up with new fast development of digital technologies.

## STRATEGIC OBJECTIVES (SO)

**SO 1. Engage stakeholders in a shared global agenda on digital health.**

**SO 2. Build and consolidate digital health capacity that reflects national needs.**

**SO 3. Commit and engage stakeholders to advance digital health in every country.**

**SO 4. Improve measurement, monitoring, research and practice in digital health.**

**Are these strategic objectives clear and comprehensive as a set?**

Yes [Y]

Additional comments

We are happy to see the concept of Digital Health Literacy included as key areas for action in the strategic objectives. This being said, it would still be beneficial to elaborate on the concept - especially from a health equity perspective - in the introductory section of the strategy. Generally, the way digital health is described between health systems/technology is unbalanced and more health promotion and preventative perspectives are needed. As it stands now digital health is presented too much as a concept itself, a standalone strategy with no concrete links and visibility of its added value to the health systems and delivery of care.

**Are there additional strategic objectives needed to move the Global Strategy forward?**

No [N]

Is **SO 1** clear and comprehensive?

No [N]

If NO, please explain

We are happy to see digital health literacy identified as one of key areas for action. As mentioned earlier, the concept would have to be elaborated in more detail in the text, as well as

Is **SO 2** clear and comprehensive?

No [N]

If NO, please explain

Public health authorities, including local and regional bodies should be taken on board when thinking of capacity building and skills improvements to design, budget for, implement, monitor and evaluate a digital health strategy, be it at national or local levels.

Is **SO 3** clear and comprehensive?  
No [N]

If NO, please explain  
Working with "policy and decision-makers", engaging "stakeholders" and "all levels" is easier said than done. Without integrating this strategy with other related initiatives and strategies, under a shared political framework, it will be difficult to make a sustainable change. Stakeholders are under pressure and increasing demand to be "engaged" and "participate". Furthermore, other, non-health, sectors have been little mentioned in the text if at all. For these reasons, the strategy risks being perceived as not central to how the world of delivery and co-creation of health has been already transforming itself. It's rather behind digital, commercial, corporate and professional developments in the field. Stakeholders involvement is a core component of the strategy, and it should be explicitly mentioned that this means also local and regional authorities, public health experts, as well as wider public health civil society. This will also mean that adequate capacity building and skills development efforts must emerge.

Is **SO 4** clear and comprehensive?  
No [N]

If NO, please explain  
It is stated that this Global Strategy builds on previous WHA resolutions, reports and initiatives; furthermore, it elaborates on the premises of assessments, evaluations and monitoring ("increment and iterate"). However, it lacks any detailed analysis of which parts of its previous and current work on the topic should be taken forward. It mentions the beneficial effect of ICT applications in some environments, while failing to scale up or deliver results in different contexts. No such assertion has been made to forecast and monitor inequality-driven worsening of health outcomes.

Additional comments on Strategic Objectives

## FRAMEWORK FOR ACTION:

- <sup>1</sup>Commit – encourage countries and involve stakeholders to commit to the Digital Health Strategy
- <sup>2</sup>Catalyse – create an environment and processes that will facilitate and encourage collaboration
- <sup>3</sup>Measure – create processes for monitoring and evaluation of the Strategy
- <sup>4</sup>Increment and iterate – take a new cycle of actions based on what has been experienced, measured and learned

**Will the proposed "Framework for Action" deliver on implementation of the Strategy?**  
No [N]

If NO, please explain  
We feel the current draft of the strategy is too much of a 'stand-alone' initiative. We miss ideas for its integration into a broader health strategy and policy horizon. There's little to put strong arguments into health stakeholders' hands to convince funding agencies, budget holders and ministries of finance that such an approach is urgently needed, who, how and why would benefit from it. As accurately noticed, financial actors may play an essential role here, as "commitments to digital health need to be backed by concrete action to invest, by mobilizing domestic and external resources and, if necessary, reprogramming moneys previously committed to outdated approaches".

**Does the proposed "Framework for Action" clearly outline actions required by WHO, countries and stakeholders for the Strategy to succeed?**  
No [N]

If NO, please explain  
The strategy would need to be accompanied by a roadmap or an action plan. It is not clear which actors are expected to act on which of the strategic objectives, how, by when and what the logical steps and milestones of it would need to be.

Please provide any specific comments on the proposed action lines below.

- 1. Commit:**
- Create a roadmap for attracting countries and stakeholders
  - Identify, approach and engage "champion" countries

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**2. Catalyse:**

- Identify and qualify needs and offers
- Match needs and offers
- Develop a roadmap for providing technical support and guidance
- Accelerate and sustain progress

**3. Measure:**

- Assess Strategy and framework for action effectiveness
- Technological trend monitoring

While it speaks of the fact that the surge of new technologies and services opens new ways of interacting, it also opens new, uncharted ways that can lead to misuse of personal and health data. Protection and precautionary principle should guide any work done in this field. Many people and public professionals are concerned by the growing inappropriate use of data. Often scientific benefit is assumed without clear consent, on the basis that social media and corporate sources already access it. Anonymity is promised but cannot be guaranteed. Those downsides are becoming more apparent. Knowledge is powerful: the lack of it can be stigmatised and abused.

**4. Increment and iterate:**

- Propose, exercise and refine
- Optimize the Collaboration Network

It is stated that this Global Strategy builds on previous WHA resolutions, reports and initiatives; furthermore, it elaborates on the premises of assessments, evaluations and monitoring ("increment and iterate"). However, it lacks any detailed analysis of which parts of its previous and current work on the topic should be taken forward. It mentions the beneficial effect of ICT applications in some environments, while failing to scale up or deliver results in different contexts. No such assertion has been made to forecast and monitor inequality-driven worsening of health outcomes.

**Additional comments on Framework for Action:**

## PROPOSED ROLES

**Will the proposed roles for WHO, relevant stakeholders and countries help to deliver on the Strategy?**

Yes [Y]

**Additional comments on Proposed roles**

## Additional comments

**Additional comments on the draft Strategy:****If you would like to submit additional materials to support the Strategy, please do so here:**

WHO global strategy on digital health 2020-2024\_Eurohealthnet\_final.pdf (175KB) EuroHealthNet reaction to draft WHO global strategy on digital health 2020-2024

**filecount - If you would like to submit additional materials to support the Strategy, please do so here:**

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