

Is there place for workers in the digital transformation of health in Europe?

EPSU's reaction to the European Commission's Communication on "on enabling the digital transformation of health and care in the Digital Single Market; empowering citizens and building a healthier society"

The communication

As part of a broader initiative to increase the availability of health data in the European Union, on 25 April the European Commission published a Communication "on enabling the digital transformation of health and care in the Digital Single Market, empowering citizens and building a healthier society" (COM (2018) 233 final).

The Commission's plan of action has three objectives:

- enabling citizens' secure, **cross-border access to their electronic health records** and creating the possibility of sharing these health records across borders;
- facilitating the **use of larger data sets through a shared European data infrastructure** to prevent diseases, determine personalised medical treatment and anticipate epidemics; and
- providing digital tools that enable citizens to **manage their health** more actively within integrated care systems.

This three-pronged approach will provide the basis for EU action in digital health over the next few years and will cover a broad range of measures that fall into these categories. For each of these areas the Commission has specified the actions it will take, with a specific focus on Member States' strategies on reforming health systems, also with the use of specific financial instruments such as Connecting Europe for the development of cross-border eHealth digital infrastructures and the H2020 research programme for the development of research projects in fields like disease prevention and personalised health and care.

The Communication also includes measures to provide support for the exchange of e-prescriptions and electronic patient summaries; enabling the cross-border exchange of full electronic health records; voluntary coordination in sharing data and resources for disease prevention and research (witness the recent Declaration of Cooperation to access sequenced genomes) [this reference sounds like it is for experts only]; and capacity building and the exchange of innovation and best practices for healthcare authorities.

What eHealth policy and solutions for what society?

As the federation representing trade unions organizing workers in hospital and social services sector in Europe, EPSU welcomes European Commission's effort to set out a clear plan for the development of eHealth infrastructures.



We recognize that digital health technologies offer valuable ways for patients, health and social care providers and enterprises providing health products, devices and services to create and share information about health, medicine and healthcare.

However, **patients, especially from below average economic and social backgrounds as well as workers are currently excluded from a full participation in the digital health opportunities that remain concentrated in the hands of a few powerful corporations.** Therefore, it is of paramount importance that European and national authorities give priority to the need of patients/citizens and of the health and social care workers to benefit from advancements in health data science, thus supporting the right to the best possible treatment for everyone. To be able to achieve this universal and affordable access to health and social care services it is important that the costs linked to the use of eHealth services for the patients/citizens can also be covered and reimbursed by the National Health Systems and the obligatory health insurance systems.

In EPSU's view, the communication is a step in the right direction but needs to be revised in several aspects.

The role, rights and responsibilities of professionals in driving change and co-determining restructuring of our health and social care systems

A first element that is not adequately addressed in the communication is **the role of professionals and workers.** They are crucial in shaping the development of new treatment and care models and the successful realisation of eHealth, mHealth or telemedicine projects. For EPSU the introduction and use of eHealth solutions have a fundamental impact on the health and social care workforce. **The idea that the digital transition is employment neutral or neutral to different professions, formal qualifications of professions and the distribution of tasks and responsibilities between the different health and social care workers is simply not true:** many healthcare professionals remain wary of digital solutions as they worry that they increase their workload, create more reporting and bureaucratic obligations or trigger mistakes or even worse, have strong impacts on the organisation of their work and their working time, risk undermining the quality of their employment as well as patient safety and trust.

Making best use of digital innovation also means supporting health professionals to become competent guides to new technologies for patients and their families, recognizing their role in the digital transition and thereby helping patients or users gain more knowledge and control over their health and/or social conditions in a safe and inclusive way.

It means not only – as the Communication suggests – to develop a health workforce of sufficient capacity and appropriate skills, but also to **ensure the active involvement and participation of all health actors**, in particular those professionals that are called on to implement and use the new digital world, applications, etc.. A renewed approach is therefore necessary to steer digitalisation of healthcare systems in a sustainable and fair direction, enlarge information, consultation and participation rights in digitalising health and social care services and create a new legal framework for crowd-workers and other atypical workers in healthcare.



Therefore **EPSU proposes:**

- to better highlight in the Communication the need **to include workers in the design of new digital health solutions** and in the development of new technologies applied in health and social care: EU-level and national social partners¹ are ready to engage with the EC in a fruitful exchange on how new technologies can improve the outcomes and the quality of safe and dignified health and social care. Such involvement is key to develop and define mutually recognised principles for the introduction and use of digital solutions such as electronic health records, telemedicine, mHealth² applications as well to help redesign and to adapt to new challenges of workplace re-organisation, working time arrangements, rostering, access to continuous professional development, etc.
- **To engage in a common reflection with the European and national sectorial social dialogue on the development of the e-health agenda** and its impact on all aspects concerning employment, labour law, industrial relations, vocational training and education, continuous professional development and occupational health and safety and other fields of actions for trade unions and their representatives at different levels.
- While addressing the demand side of the digital transformation of health and care, the Commission should also develop **guidelines and promote mechanisms for facilitating further consultation between the various stakeholders involved in digital health**, including trade unions, employers, patients or users of health and social services. The roles, rights and responsibilities of the different stakeholders involved in connected digital health services also need to be better identified and where necessary re-regulated.

How to address the digital divide in healthcare?

Digital technology, including mHealth and eHealth, is a key part of the future of European healthcare and therefore we welcome the emphasis on **the need to equip the health workforce with an adequate set of skills and competences**. The priority in EPSU's view should be on **addressing the huge digital divide** that prevents professionals, nurses and health care assistants (especially in the context of an ageing workforce) to fully integrate and take advantage of new technologies.

For this to happen we need an holistic approach, with training opportunities throughout workers' careers ensuring that **they are not left alone** to deal with the introduction and use of new digital infrastructures, devices, applications, etc.. This enables them to be fully informed and consulted about related restructuring and – where they wish to do so – gives them the possibility to be **the co-developers of mHealth and eHealth solutions on the basis of structured consultations at different levels** (from workplace to sectoral to national level).

Therefore **EPSU proposes:**

- To launch a **common and coordinated initiative in cooperation with social partners on digital skills** and the related adaptation and/or upgrading of professional

¹ including EPSU and HOSPEEM for the hospital/health care sector or EPSU and the Federation of European Social Employers for workers in social services (in particular in elderly care, care for persons with disabilities and child care)

² mHealth (also written as m-health) is an abbreviation for mobile health, a term used for the practice of medicine and public health supported by mobile devices.

qualifications for health professionals/workers using also instruments that are already in place such as the European skills alliances.

- Member states should **ensure adequate funding for Continuing Professional Development (CPD) strategies**: these need to enable healthcare professionals to deliver mHealth and eHealth solutions to their patients. Recent joint work of the hospital/health care sector have shown that it is in addition essential to set up policies and measures that can help to provide and guarantee access to CPD (which is a responsibility of the employers) for the workers that need upskilling or re-training and that access to CPD goes beyond pure education and training aspects, but also can only work in the context of adequate staffing levels, healthy and safe working conditions, etc.

Secure access to and management of health data by workers and patients/users

EPSU recognizes that effective diagnostics and treatment should be supported by a systematic collection of and access to patients' health data/users' social care data when it comes to the sharing of information between health and social care services and/or providers.

EPSU's main concern is to **keep the data for medical purpose only** and to prevent its exploitation for private profit. On this point the communication is very vague and leaves room for interpretation as to what the Commission considers as "other stakeholders" that should be included in the data sharing mechanisms for personalised care. On the contrary, it is important that electronic health records are securely managed and protected in line with healthcare data management protocols.

For this reason, effective CPDs strategies are important. This includes training and knowledge for the workers as to data management and privacy standards for patients in cloud environments and security investments over big data storage. Compliance should also be required for app developers, hosting providers, cloud computing services and anyone, including subcontractors, involved in the healthcare sector and who might in any way have access to electronic patient health information. Further to this, while we welcome the adoption of the GDPR regulation, workers are left alone with no ad hoc guidelines when it comes to collecting and manipulating patient's personal data in compliance with the new EU standard for privacy.

Therefore **EPSU proposes**:

- The issue of applying data protection rules for workers should be regulated in a **specific directive stipulating minimum standards that covers both the need for protection of workers' personal data** and the role of trade unions when they act as a part of the collective bargaining process³.
- To ensure patients access and control over their own health data to allow them to update information or transfer files from one doctor to another.

³ Cfr ETUC position on the General Data Protection Regulation



Preserving the public nature of the new eHealth infrastructures and services:

Many see eHealth as another way to save money and cut costs. Health systems in Europe are facing unprecedented challenges as they seek to deliver better quality and patient-oriented healthcare against a backdrop of increasing levels of chronic-degenerative diseases, ageing populations, and reduced public spending. In this scenario digital health tools and services can be part of the answer, offering patient-centred integrated and accessible solutions on the basis of investments from the Member States and the European Union to ensure quality and accessibility for citizens in future.

It means that – if we want to couple digital innovation, integration of health and social care services with technical accessibility – **we need a plan of investment in public research, in the technical infrastructure and the workforce** to modernise the public provision of healthcare that can keep pace with digitalisation, the introduction and use of new technologies as well as ensuring that these improvements are available for all patients and citizens.

At the moment we see the contrary: there is an **uneven spread of new technologies**, especially in poorer regions where health and social care professionals are still confronted with inadequate means to cope with the digital transition, while we have fully digitalised health services in other regions where risk is that they will only be available to a few citizens and professionals. How we reconcile those two elements is still unclear and this risks just creating another opportunity to boost the profits of the private companies that hold the know-how and technology. For this reason, we do not consider private-public- partnerships (PPP), especially in a sector already exposed to privatisation and marketisation and with key technology or platforms in the hands of few global corporations, as a viable instrument to ensure the development a quality healthcare accessible and affordable for all the citizens.

On the contrary the EC proposes “*to facilitate investment opportunities in Member States and regions to leverage public and private investment for the large-scale deployment of digitally-enabled, integrated person-centred care*”. We consider that PPPs are, in the mid- and long-term run, an expensive and inefficient way of financing infrastructure and services, especially when they are dealing with critical elements such as data concerning treatments and patients. These, have to stay in public hands with sound democratic and public control. (reference to the literature, and the EU Court Auditors...)

Therefore **EPSU proposes:**

- To challenge the promotion of private public partnerships and instead insist to **increase public investments in the digital transformation of our health systems** (infrastructure, workforce, support of patients).
- The European Commission should address measures to overcome **the uneven access to new technologies by workforce** across different countries and regions in Europe, in particular in the countries most hit by the austerity measures
- The European Commission needs to **further involve social partners in the reflection concerning the transition to new care provision models**: the sectorial social dialogue is an important platform for investigating the impact on workforce of the new care models, creating opportunities to establish trust, confidence and good collaboration and involvement of the workforce in designing transition strategies.