

European Junior Doctors' (EJD) Position on E-Health

EJD calls for comprehensive and improved digital health literacy and enhanced digital competencies for all healthcare professionals through undergraduate and postgraduate programs for continuous professional development.

EJD recognises the added value of digitalisation in healthcare but insists that it needs to be developed with input from healthcare professionals (HCP) and patients. Regulators and administrators need to consider the added workload that digital tools often require from HCP.

EJD congratulates the EU for aiming to standardise digital technologies in healthcare to provide evidence-based and ethically sound solutions for health. However, the expenses of digitalisation cannot fall to independent healthcare providers and should not contribute to constantly growing healthcare costs, and digital technologies should support all members of our society and not increase inequalities in accessing health services in the future.

EJD recognises the need to ensure that new digital health solutions and regulations protect patients' privacy and human rights and guarantee that those standards are ensured when developing different regulatory frameworks (EHDS, IA act)

Background

E-health is the use of digital technologies for healthcare purposes. The field encompasses various digital health technologies and subfields, including health information technology, <u>health informatics</u>, wearable medical devices, software as a medical device, personalised medicine, mobile health, and telemedicine and telehealth (<u>1</u>, <u>2</u>).

Ongoing digitalisation in healthcare is spreading to all European countries and significantly affects how healthcare will be provided, organised and developed. Digitalisation is promising improvements in the quality and accessibility of healthcare. It raises concerns about growing workloads, uncertainty regarding responsibility, privacy and costs related to this transition and digital technologies.

The technological advances aim to introduce more personalised and novel care-delivery models based on real-time information and data, teleconsultations, and other tools for communicating with patients and other HCPs. These changes will require new digital skills for HCP and patients with fundamental improvements in digital literacy.

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Despite the encouraging examples from some EU member states, the digitalisation of healthcare is proceeding at a greatly unequal speed. Even where evolution is rapidly proceeding, training is not prioritised, creating unnecessary pressure for HCP. This added to the often poor interoperability, high costs and unclear regulation, creates friction in achieving better access and more flexibility in work followed by better care provision.

Our view

EJD proposes focusing on the four key areas and directions to develop digital health. However, it is vital to remember that those areas must deliver promises to improve health and support healthcare professionals along the way.

Updated and improved digital health literacy and digital competencies

All HCP should acquire a fundamental understanding of the principles and limitations of Digital Health technologies and new devices as a part of their curricula to deliver the best available future-proof care for their patients. Digital health literacy and competencies (i.e., AI & robotics, clinical decision support systems, digital therapeutics, and others) should be implemented into undergraduate and postgraduate programs. Furthermore, training in digital technologies should also be provided to all medical personnel following continuing medical education and professional development (CME/CPD) principles. However, to successfully adapt to current changes and technological advancements in the working environment, it is essential to expand the training, including more training on soft skills like collaboration, communication, critical thinking, and change management abilities to help our healthcare workers to play a key role implementing evidence-based technologies into clinical practice and to improve outcomes and experience to patients.

E-health solutions supporting healthcare professionals.

The development of eHealth tools and new ways of working should be user-driven, in cooperation between physicians and other healthcare professionals, patients and technology experts. Maintaining a doctor-patient relationship and securing trust and accountability from both sides is essential, alongside a focus on better interoperability and considering the associated burden of using new Digital Health technologies in clinical practice. The evidence demonstrates the higher risk of professional burnout and job dissatisfaction using poorly designed digital solutions in daily work (3,4,5).

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EU guidelines and regulations focused on equity and safety in adopting digital technologies at the EU level.

A more unified approach to implementing digital health solutions, better exchange of current knowledge and expertise, and support for the countries and institutions to adopt currently leading solutions are needed to reduce the existing inequalities in digital maturity, use of technology, financing of developing of new technologies and digital literacy between EU countries.

While the success of the implementation of digital technology is determined at the local or national level, we support current initiatives and efforts of EU institutions to introduce regulations for digital technologies in healthcare in Europe. The European Health Data Space (EHDS) and AI Act are timely efforts to introduce regulations and rules to protect patients' rights and accelerate further research and innovations by strengthening data quality rules, transparency, interoperability and accountability. However, despite the aims of the European Health Data Space (EHDS) and AI Act to regulate technology, several areas remain to be improved. Firstly, new requirements and implementation should not exacerbate already high and constantly increasing healthcare costs. Secondly, new requirements must reflect the needs of medical professionals and patients and not create further obstacles or compromise time for doctor-patient relationships and cooperation. Regulation should provide clear standards and interoperability and ensure that only high-quality data is used to provide a safe and high standard of care. Furthermore, only certified and evaluated digital applications and medical devices that comply with CE marking or ISO standards (e.g. ISO/TS 82304-2 on Health and wellness apps – Quality and reliability) should be used in clinical practice and integrated into hospital information systems to ensure trust and better adoption of technology across medical professionals and patients in Europe.

Protecting privacy, human rights and transparent secondary use of medical data

Although the above-discussed proposals, like EHDS and AI Act, include measures to protect privacy, such as data pseudonymisation and encryption, more than these measures may be required to prevent data breaches or unauthorised access. This is related to the fact that highly sensitive health information could be potentially accessed by a wide range of stakeholders, including researchers, policymakers, and private companies. These privacy concerns must be carefully considered and addressed to ensure that the EHDS proposal can achieve its intended goals while protecting the privacy and autonomy of patients and HCP. This can be achieved if the proposed secondary use of health data is subject to strict safeguards and protections, including data Registered office

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anonymisation, data encryption, and informed consent. It is also essential to have clear regulations and guidelines that govern the collection, storage, and sharing of health data to prevent any abuses of personal information and protect the privacy and rights of individuals.

When focusing more on AI, it is vital to have ethical and human rights principles, including transparency, accountability, and respect for individual autonomy, to reduce the risk that algorithms could perpetuate existing biases and inequalities in healthcare by making decisions based on incomplete or partial data.

EJD advocates for better digital health implementation that follows the recommendations mentioned above. Better training, implementation of only evidence-based and ethical solutions, improved workflow and interoperability and refining how we will safely digitally work with our patients protecting their rights and privacy are the core values and directions for future work.



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