



Commission's public consultation on the Green Paper on mobile Health

HOPE response

July 2014

HOPE is the acronym of the European Hospital and Healthcare Federation, an international non-profit organisation, created in 1966. HOPE represents national public and private hospitals associations and hospitals owners either federations of local and regional authorities or national health services. Today, HOPE is made up of 35 organisations coming from the 28 Member States of the European Union, as well as from Switzerland and Serbia as observer members.

HOPE mission is to promote improvements in the health of citizens throughout Europe, high standard of hospital care and to foster efficiency with humanity in the organisation and operation of hospital and healthcare services.

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HOPE recognises the potential offered by mHealth solutions and welcomes the development and spreading of the use of mHealth. However, some key aspects need to be taken into account in the following areas:

Data protection:

Data protection constitutes one of the most important challenges in developing mHealth solutions and **the operational environment of mHealth should fully be considered in the EU data protection rules**. The Commission's proposal published in January 2012 (COM(2012)11) is not paying enough attention to mHealth and the actual impacts of the proposed regulation on mHealth development have not been investigated.

Furthermore, we would like to stress that the objective to ensure a high level of data protection in the field of mHealth must be achieved without adding additional bureaucracy and creating unnecessary administrative burden.

Big data:

HOPE believes that there is a clear need to develop at national level common ethical, technical, regulative and other guidelines about how data is being and should be used.

HOPE also believes that more education and training should be available on handling large amounts of data.

Patient safety and transparency of information:

Patient safety is an issue of utmost importance in the development, testing and use of mHealth services. **A mHealth service shall not put at risk the safety of patients**. For this reason, there is the need to ensure mHealth solutions comply with appropriate quality and safety safeguards and that citizens can have access to information about the quality and safety of mHealth services.

mHealth in healthcare systems and equal access:

Committed to promote improvements in the health of citizens throughout Europe, and to foster efficiency with humanity in the organisation and operation of hospital and healthcare services, HOPE would like to highlight **the importance of ensuring that all people, included disadvantaged people and those living in remote areas, are given equal opportunities for using mHealth**.

Interoperability:

HOPE supports the proposal to promote interoperability between mHealth solutions. It is also important that businesses and mHealth services developers understand that their products should be interoperable with basic social and health care data systems.

Research and Innovation:

HOPE strongly believes there is an EU-level interest in studying and analysing the costs and benefits of mHealth use and supports the idea of including, also in the future, mHealth as a focus area in EU programmes such as Horizon 2020.

In conclusions, HOPE does not see a strong need for new EU level legislation on mHealth. However, we believe the EU can promote mHealth in the field of interoperability, research and innovation, transparency of information and security criteria especially for commercial mobile apps.