

HOPE contribution to the European Commission Call for Evidence “Apply AI Strategy”

In light of the rapid and increasingly opaque artificial intelligence (AI) developments affecting all economic sectors including healthcare, HOPE thinks it is important that the Apply AI Strategy not only stresses Europe’s competitiveness and productivity but that its main emphasis is placed on developing human-centric, user-friendly innovation meeting actual needs and preferences rather than what is technologically conceivable but may hold little applied value. In hospitals and healthcare services, the potential of AI should be seized in areas where automation frees up time (e.g., delegating routine administrative tasks to increase patient contacts) and where it supports professionals by enhancing knowledge, precision, and quality of care (e.g., disease detection, surgical support) as well as patient accessibility.

It is critical to be guided by a distinct, inclusive and value-based European AI vision: global leadership in this area should mean ensuring solid privacy and data protection measures and safeguards for upholding the fundamental rights of all people. Since the real-world trustworthiness and security of AI systems can only be properly assessed over time, and AI is bound to become a target for cyber-attacks, it will be important to closely monitor and evaluate them. All new technologies contain flaws, the impacts of which are not immediately evident.

The growing AI literacy gap, which affects ordinary people as well as hospital and healthcare staff, needs to be addressed to enable their meaningful participation and co-creation. AI education and training should include critical thinking skills given that human oversight in healthcare is vital. End users must be able to recognise if and when certain AI systems present privacy, patient safety or cybersecurity risks (including across the supply chain), healthcare data being particularly sensitive. Attention must also be paid that the increased adoption of AI does not result in widespread redundancies or closures. The European healthcare sector is in crisis and would also benefit from other forms of innovation and sustained investments. AI should not exacerbate health inequalities by placing commercial before societal interests, reducing human connections and disrupting workflows.

There is a growing need to ensure continuous dialogue on the adoption and potential of AI with healthcare stakeholders, including HOPE as a representative of hospitals and healthcare providers, to have an up-to-date picture of everyday opportunities and challenges. Healthcare representatives should be included in the AI Advisory Forum of the AI Act to ensure cross-sectoral dialogue; in addition, the Commission may wish to consider setting up a dedicated healthcare AI group since the future European Health Data Space (EHDS) Stakeholder Forum will not be able to accommodate in-depth discussions specifically on AI. The power and complexity of generative AI models able to create new data or content poses many ethical challenges, such as the need for vast amounts of training data – which must not be biased -, users’ ability to gauge the robustness of results, and disinformation (e.g.,

deepfakes). Therefore, an impulsive adoption of AI systems found to be productive in other industries must be avoided in healthcare.

AI being closely linked with legislative and non-legislative policy initiatives advancing digital health including the EHDS, the EU Data and Data Governance Acts, NIS2 and the EU Action Plan on the cybersecurity of hospitals and healthcare providers, the Medical Devices / In Vitro Diagnostic Medical Devices Regulations, the EU Pharmaceutical Legislation, the upcoming Data Union Strategy, etc., the Apply AI Strategy must reflect the ambitions and obligations – including for manufacturers – contained therein. It will also be important to evaluate whether voluntary codes of conduct and related actions driven by industry are sufficiently aligned with the EU's people-centred AI vision as the possibilities of AI evolve.

HOPE, the European Hospital and Healthcare Federation, is a European 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 36 organisations coming from the 27 Member States of the European Union, as well as from the United Kingdom, 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.