

COCIR response to the consultation on an EU digital ID scheme for online transactions across Europe ¹

COCIR appreciates the opportunity to provide feedback to the European Commission's consultation on an EU digital ID scheme.

The digital transformation of healthcare is progressing at an ever-increasing pace. It should be clear that this transformation is not merely about upgrading from paper records, fax machines and CD-ROMs with pictures to digital formats and means of communication. It is about making information available and accessible, ensuring continuity of care in a remote way and leveraging data in order to come to new insights and innovations that help drive better health outcomes.

The importance of identity as a key factor in moving towards a patient-centred and integrated care approach can not be overstated:

- A patient needs to be easily and reliably identifiable by care providers so that all relevant information and health data can be correctly registered and retrieved.
- It is crucial that care providers can timely, and in some cases urgently, act upon the most accurate information. The exchange and availability of the patient information should be warranted between different care providers locally and across country borders.
- Common identifiers shared by the supporting information systems will increase the level of interoperability and the efficiency of data flows. As the patient moves through the continuum of care it is essential that his or her health-related information travels along in a safe and secure way. This process should run smoothly and seamlessly so that the patient and the care provider can fully focus on the care process.
- Identification and authentication are key to ensure the patient can securely access his or her own health data. Next to that, it should enable the patient to share information and data, as they wish, with whom they wish.
- Public health systems and their financing are under increasing pressure, which necessitates a permanent focus to eliminate waste of resources and to increase efficiency. A streamlining of processes and information flows between patients, care providers, payers and the public sector on the basis of trusted identity and services is therefore crucial.
- The unprecedented challenges we face as a consequence of the COVID-19 crisis have further required us to rethink existing processes. The accelerated shift towards digitally supported and remote care processes have underlined the need for trusted identity services to ensure continuity of care.

In view of the above, COCIR is fully supportive of the Commission's intention to strengthen the eIDAS framework, to address current shortcomings and fragmentation, and to adapt to the changing context brought on by the digital transformation and the uptake of novel technologies.

¹ <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12528-European-Digital-Identity-EUId->

COCIR would like to recommend to the Commission to consider:

- A more coordinated and binding approach to introduce trust services in the public sector
- A continuing effort to support and drive harmonisation, where necessary, in order to address market deficiencies that would strongly hamper the uptake or interoperability of trust services
- Making identification and authentication services available to the private sector

COCIR would like to stress however that:

- The use of trust services by the private sector should remain voluntary and implementation should be made possible without excessive or burdensome requirements compared to other private sector initiatives
- The introduction of new trust services should always consider a variety of use cases so that for each case a fitting balance can be found between security and convenience
- Appropriate consideration should be given for the need and desire of citizens to a self-sovereign or decentralised identity whereby the citizen has a more granular level of control in disclosing identity information with other parties

COCIR understands there might be some value in establishing a clearly visible and trusted “EU”-branded ID scheme, however, based on the current situation we do not consider this to be elemental in strengthening and enhancing the existing framework.

COCIR remains committed to working with the European Commission and other involved stakeholders to create a flexible and secure framework for trust services.

COCIR firmly believes the abovementioned measures will lead to a more secure landscape and empower citizens to take full control of their digital identity. Within the healthcare sector, this ultimately will lead to a better and safer patient journey, a more efficient use of resources and more resilient public health systems.

COCIR References

[Identity in Healthcare – A Key Enabler to Integrated Care](#) (May 2018)

About COCIR

COCIR is the European Trade Association representing the medical imaging, radiotherapy, health ICT and electromedical industries.

Founded in 1959, COCIR is a non-profit association headquartered in Brussels (Belgium) with a China Desk based in Beijing since 2007. COCIR is unique as it brings together the healthcare, IT and telecommunications industries. www.cocir.org