



## EFN Policy Statement on the Transparent Implementation of EHDS

As underlined in the [EFN Policy Statement on EHDS](#) (2023), the EFN welcomed the European Commission proposal to develop the [European Health Data Space \(EHDS\) Directive](#), which has now entered into force, after final approval by the European Parliament and the Council of the EU. While supporting the EHDS's intended objective to empower EU cross-border healthcare provision through effective digitalisation and health data sharing, the EFN believes that effective implementation can only be achieved through transparent dialogue with frontline nurses as end-users.

According to the EHDS Directive, by 2027 the three main EHDS governance bodies will need to be set up. These are the EHDS Board, composed by Member States representatives, the Steering Group for Infrastructures, also composed by Member States representatives, and the Stakeholders Forum, which is intended to be a platform for the exchange of information and cooperation with stakeholders. Ensuring a collaborative approach through a credible Stakeholders Forum, that includes the perspective of frontline nurses and allied healthcare professionals (HCPs) as end-users, will foster trust and contribute to the acceptance, effectiveness, and rapid adoption of the EHDS. This is key to avoid additional unnecessary bureaucracy and workload for frontline nurses and allied HCPs, and to prevent a fragmented interpretation of the EU law.

The EFN stands ready to be an active and engaged partner in implementing the EHDS. Believing that by fostering meaningful collaboration with frontline nurses and allied HCPs as end-users, the EHDS could greatly contribute to the smooth digitalisation of EU and European healthcare ecosystems, improving frontline nurses' time for direct patients care, the EFN calls on the European Institutions and the Member States to:

1. Set up the EHDS stakeholders forum as quickly as possible, while allocating sufficient resources to ensure the Forum's effective operation. Formally engaging with key stakeholders, including the EFN as the representative of EU and European frontline nurses, which are end-users, will facilitate a smooth and transparent implementation of the EHDS.
2. The EHDS Stakeholders Forum can be a rebranded [eHealth Stakeholders Group](#), of which EFN is an active member, but the EHDS Stakeholder Forum should have a more structured format with regular meetings to enable continuous dialogue. However, parallel

stakeholder bodies need to be developed where the health professionals' stakeholders will have the opportunity to discuss any other topic related to the digitalisation of healthcare ecosystems.

3. Establish effective and transparent communication channel between the three Governance Bodies, ensuring that the Stakeholders Forum recommendations are well received and taken into account by Member States representatives which are in charge of the EHDS's implementation.
4. Ensure that the EHDS Board and the Steering Group for Infrastructures operate under full transparency, with clear rules of procedure, as well as with a mandatory duty to respond to the questions and recommendations of the Stakeholders Group in a timely manner.
5. Make adequate funding available through the [Recovery and Resilience Facility \(RRF\)](#), as well as other existing funding streams like the [Digital Europe Programme](#), [Horizon Europe](#), and [EU4Health](#), or innovative funding streams, to train and educate frontline nurses and allied HCPs on the implications that the EHDS will have on their daily practice, ensuring that they are willing to support the EHDS's implementation.
6. Invest in EU domestic nursing workforce capacity building in line with the [Directive 2013/55/EU](#) and the [Updated Annex V](#) in which eHealth is specifically mentioned to support the digitalisation of the nursing care process. Frontline nurses have to acquire the baseline competencies (Art 31 Directive 2013/55/EU) required to ensure a smooth implementation of the EHDS.

#### **Further readings:**

- EFN Policy Statement on improving frontline nurses' time for direct patient care with digitalisation and responsible AI (2024). Available at: <https://efn.eu/wp-content/uploads/2024/10/EFN-PS-improving-frontline-nurses-time-for-direct-patient-care-with-digitalisation-responsible-AI-Oct.-2024.pdf>
- EFN Policy Statement on the European Health Data Space (EHDS) (2023). Available at: <https://efn.eu/wp-content/uploads/2023/04/EFN-Policy-Statement-onEHDS-April-2023.pdf>
- EFN Position Statement on Nurses Co-Designing Artificial Intelligence Tools (2021). Available at: <https://efn.eu/wp-content/uploads/EFN-PS-on-Nurses-CoDesigning-Artificial-Intelligence-Tools.pdf>
- EFN Policy Statement on Nurses Digital Competencies (2019). Available at: <https://efn.eu/wp-content/uploads/EFN-Policy-Statement-on-Nurses-DigitalCompetencies-Nov.2019.pdf>
- The Recovery and Resilience Facility. European Commission. Available at: [https://commission.europa.eu/business-economy-euro/economicrecovery/recovery-and-resilience-facility\\_en](https://commission.europa.eu/business-economy-euro/economicrecovery/recovery-and-resilience-facility_en)

- The European Semester. Available at: [https://commission.europa.eu/business-economyeuro/economic-and-fiscal-policy-coordination/european-semester\\_en](https://commission.europa.eu/business-economyeuro/economic-and-fiscal-policy-coordination/european-semester_en)
- The European Pillar of Social Rights. Available at: <https://ec.europa.eu/social/main.jsp?catId=1226&langId=en>
- The Pact for Skills. Available at: [https://pact-for-skills.ec.europa.eu/index\\_en](https://pact-for-skills.ec.europa.eu/index_en)

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