

# **RESPONSE BY THE FINNISH CENTRE FOR HEALTH PROMOTION AND THE FINNISH FEDERATION FOR SOCIAL WELFARE AND HEALTH TO THE COMMUNICATION FROM THE COMMISSION OF THE EUROPEAN COMMUNITIES REGARDING COMMUNITY ACTION ON HEALTH SERVICES**

## **INTRODUCTION**

The Finnish Centre for Health Promotion (FCHP) is a NGO, which supports and develops structures that promote health and increases the awareness of health-promoting choices. The FCHP has 125 members, most NGOs and representing widely organisations working nationally with health (promotion) issues. Practical activities of the FCHP are composed of four complementary units: basic activities, quality and service activities, prevention of substance abuse and other development activities. Further details of FCHP's organisation and activities can be found at [www.health.fi](http://www.health.fi)

The Finnish Federation for Social Welfare and Health (STKL) is a nationwide social policy organisation, NGO. It has 132 nationwide NGOs in social and health sector as members, 16 regional associations and municipalities as supportive members. The Federations goals are influence and lobby to improve social protection system, reduce disadvantage and poverty, strengthen social responsibility and increase peoples scope for influence and participation. The Federation is an expert association, which collaborates, lobbies, makes research and offers services like training and information service among others. The Federation keeps under review developments in Finnish society and the effects of social changes to citizens' everyday life. More [www.stkl.fi](http://www.stkl.fi)

## **WELCOME**

The FCHP and the STKL welcome the Commission's intention to develop a Community framework for safe, high quality and efficient health services, by reinforcing cooperation among Member States and providing certainty over the application of Community law to health services and health care.

Because the FCHP is primarily concerned with the promotion of health and the prevention of disease and the STKL with social protection, including social and health services, this response refers to those parts of the Commission's communication, which seem pertinent to these issues.

## **THE NEED FOR COMMUNITY ACTION**

At 2.2, the question is raised of defining shared values and principles for health services on which citizens could rely throughout the EU, and the practical consequences of doing so.

Recognising that the EU has already affirmed its commitment to the value of the health of all EU citizens, through the pursuit of policies across all sectors of society, the FCHP and the STKL consider that an important implication of this shared value is to establish the principle of setting high standards for the promotion of health and the prevention of disease throughout the Community. The practical consequences of this would be the use of Community instruments to define and progressively raise the standards of effectiveness of health promotion and disease prevention practice and practices in health services in all Member States.

The movement of a substantial and growing proportion of the EU workforce among Member States adds complexity and urgency to this challenge. Currently, for example, many workers are being denied health promotion through their deficiencies in the languages of their host countries, while others find that essential, inexpensive disease prevention services, which are routine in their countries

of origin, are either not properly communicated, not available, or provided to an unsatisfactory standard.

There are also widespread failings to meet the challenges of providing appropriate, comprehensible, culturally sensitive, information to patients, and of promoting patient self-care and empowerment, the heart of health promotion practice.

Response to question 1

It is important to ensure that co-operation actions among Member States, and actions by the Community, are commensurate in scale with: a) existing and evolving problems, and b) the Community's main responsibilities, in the field of public health, health promotion and disease prevention; and also to ensure that such actions are sufficiently resourced to achieve their objectives.

## **AREAS OF POSSIBLE COMMUNITY ACTION**

Response to question 1

From users` and NGO's point of view all actions at EU-level should support that safe, high quality and efficient health services are available so near to patients as possible. The co-operation between the Member States in the area of health services and Community level actions should be appropriate compared to the problems and the main resources at the Community level should also in the future be allocated to the main issue, health promotion.

Response to question 2

There are needs of clarification in the area of cross-boarder health services. There is need for information and clarity especially from the point of view of the patient about the rights of the patient, of the quality of services, queuing times, about the costs of services and who is responsible to pay them and how to handle the patient harms and how responsibilities between the countries is shared in these cases. When a person gets health services in an other country, it must be clear how the continuity of the care is guaranteed. While the structures and practices in the area of health services are so different in different Member States, there is a need for discussion and clarification, what kind of control mechanisms are needed. The language issue is also crucial when we are talking about health services. Questions connected to responsibilities should be clear from the point of view of the patient, service provider and the funder. It needs to be clear in what kind of situations, there is a need for permission beforehand from authorities and the funder to get health services cross the border.

Responses to question 6

1. Meeting the needs of EU citizens for high standards of effectiveness of health promotion practice has for many of years been the subject of concerted actions within the European health promotion field.

An important next step in meeting the needs of EU citizens, is to ensure that the free movement of health promotion practitioners across the Community is supported by high common standards. To achieve this necessitates defining and agreeing on:

a) the essential core competencies and professional standards necessary to become accredited to practise effective, evidence-based health promotion, and b) the requirements for academic and in-service training needed to achieve those professional standards.

2. An important issue not addressed in the Communication is the potential problems attendant on the need for health care service providers to share information regarding health care service users. This issue must be considered seriously, and actions need to be taken that will ensure that the basic rights of patient confidentiality and information security are protected right across the Community.

3. Because it is a primary responsibility of health care provision, as far as possible to protect the population from harm, measures are required to develop and ensure rapid information exchange among Member States about actual, or suspected, problematic service providers.

Responses to Question 8:

1. Since 1998, the Commission has given support to the development and sharing of the knowledge bases for evidence-based health promotion practice and - to some extent - for the definition of the systems characteristics and infrastructures that are needed for effective and sustainable implementation of effective health promotion.

The FCHP and the STKL consider that this development work needs to be maintained and, in the case of systems and infrastructures, significantly expanded, to provide sound advice to enable Member States to invest with confidence in this field.

2. An increasingly important issue that needs to be actively addressed is eHealth. In order to help citizens, health systems, and companies working in this field, information regarding different kinds of eHealth innovations needs to be strongly developed and effectively shared. It would be useful to develop a surveillance system soon, in order to identify, document and share all eHealth innovations across the Community.

## **TOOLS AND INSTRUMENTS FOR COMMUNITY ACTION**

1. Whereas legal instruments will in due course be required to underpin accredited health promotion practice, at this point the open method of coordination would be a more appropriate approach to raising professional standards of health promotion practice, and to improving health promotion systems and infrastructures.

2. The need to ensure that the basic right of patient confidentiality and information security is protected right across the Community now requires legal instruments that embody common standards, which are harmonised to the highest levels currently obtaining, which provide for monitoring and enforcement.

3. The responsibility to protect citizens from harm from problematic health care providers right across the Community requires legal instruments that embody common standards, which are harmonised to the highest levels currently obtaining in Member States, and which provide for monitoring and enforcement.

## **NEXT STEPS**

The FCHP and the STKL are looking forward to the Commission's response to the inputs from this consultation, and offers to be of service in future stages of this important endeavour.

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