**Decision of the Cooperation Committee of programme “Green ICT” regarding the appraisal of the predefined project “Health Sense”**

**Date: 15.01.2021**

Cooperation Committee members:

Ms Anu Kull, Ministry of Economic Affairs and Communications

Ms Keit Kaadu, Ministry of Economic Affairs and Communications

Mr Magnar Ødelien, Innovation Norway

Ms Sille Kraam, Ministry of Economic Affairs and Communications

Mr Tanel Tomson, Ministry of Economic Affairs and Communications

**Background**

According to condition set in Annex I of the Programme Agreement there is an obligation of the Programme Operator to carry out an external and independent appraisal of the predefined project, in order to verify its quality and contribution to the objectives of the Programme as well as compliance with EU and national legislation.

Estonian Ministry of Economic Affairs as Programme Operator has asked Information System Authority and Data Protection Inspectorate to go through the description and budget of the predefined Project “Health Sense” in order to assess the suitability of the project with set requirements and give their independent opinion on planned project.

**Information System Authority** has come to the following conclusion:

*Based on detailed project description and supplementary communication with the leading Project partner (Health and Welfare Information Systems Center) we find that the Project suites well with the intent and provisions of the Programme.*

*Project plan is prepared well. Several other completed and on-going development projects by Health and Welfare Information Systems Center create supportive context for the Project.*

*Project would be a significant advancement in Estonian digital economy.*

*In conclusion, the Project is of high quality and, in our opinion, contributes well to the Programme outcomes. Project promoter addresses also very important data protection concerns adequately in the project plan.*

**Data Protection Inspectorate** has become to the following conclusion:

*Until now, the main problem in practice has been the need to combine data from different datasets based on a unique identifier that distinguishes people from each other– the personal identification code. As a result, in many cases, data is personalised for research. It is true that the release of personalised data requires prior authorisation by the Ethics Committee or the Data Protection Inspectorate, but such permission does not mitigate the risks involved in such release. It is essentially impossible to verify the subsequent fate of the personal data issued once. Therefore, any technological solution that better ensures the protection of personal data is to be welcomed. Health Sense is creating a technological solution that allows research with previously pseudonymised data. We welcome that the state is increasing its capacity to bring data into a pseudonymous form before releasing it for research. We expect that this should reduce the need to issue a data in personalised manner in future.*

*In conclusion, however, the compliance of the Health Sense project with data protection requirements depends on how the project is actually realised, so it is not possible to provide a forward-looking abstract statement. However, in the light of the description of the project and looking at the parties involved and their expected knowledge, we expect that project promoter respects all the data protection requirements.*

**Decision of the Cooperation Committee**

Programme Operator has sent both independent conclusions and proposal to finance the pre-defined project “Health Sense” to members of the Cooperation Committee on 08.01.2021. As there were, no objections sent by 14.01.2021, Cooperation Committee has made the following decision:

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| Relying on the conclusions of two independent experts we decide to finance the pre-defined project “Health Sense” in amount of 2 000 000 euros as part of the programme EE-Innovation (“Green ICT”). Estonian Ministry of Economic Affairs and Communications (Programme Operator) will conclude a trilateral project contract with Enterprise Estonia (Implementing Agency) and Ministry of Social Affairs (Project Promoter) to agree all the specific terms for using the grant and implementing the pre-defined project “Health Sense”. |

Final version of project description and budget are enclosed.

Minutes taken by

Tanel Tomson