

COMMENTS ON REVISION OF THE EIDAS REGULATION – EUROPEAN DIGITAL IDENTITY (EUID)

Finnish ministry of Social Affairs and Health thanks for opportunity to give comments on the eIDAS regulation revision.

For social and health care sector usage of personal information is very important. Information is collected during processes and it is distributed to other participants in the process. In this work identity of the person is crucial for high quality service. Because of high sensitivity of information identification and authentication is important if there are any eServices related.

In Finland there is the national ID that is used in all sectors. The Finnish ID is given to all visitors as well if they use social and health care services and this ID is used to store information related to them. As an additional information their original ID can be stored to the records..

In healthcare there is the European definition how to transfer prescriptions and patient records from Finland to their own country. Identities are converted in this process.

Common ID cross member states would make easier to manage patient information from other member states and people traveling between member states. In Finland we have already cross sectoral national ID and thus we have good capability of using such ID. However, current ID is implemented in so many systems already that changing the format or content of the ID has been estimated to cause several hundreds of millions costs and requiring several years to implement. In this sector it is difficult to see such big advantages that such costs are justified. With a long enough transition the change is possible to implement if it is otherwise found important.

In authentication systems there is no social or healthcare specific system but general national electronic authentication system is used.

Teemupekka Virtanen
Senior Adviser
Ministry of Social Affairs and Health