HEALTHDATA@PT
Laying down the foundations for the Health Data Access Body in Portugal

Project acronym: HealthData@PT

Project full title: Setting up a Health Data Access Body in Portugal and laying the national foundations for EHDS2

WP2 – Dissemination, Training and Support

D2.1– Dissemination, training, and education plan

Project Coordinator	Shared Services of Ministry of Health, E. P. E. – SPMS, E.P.E (Portugal)
Start date of the project	01/11/2023 **Duration** 48 months
Work Package	WP2 - Dissemination, Training and Support
Status	Final
Document version	1.0
Dissemination level	Public
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Due Date	28th February 2025
Deliverable Date	24th February 2025
Deliverable type	Other

Co-funded by the European Union

Document Revision History

Version	Date	Summary of main changes	Author(s)
0.1	19/01/2024	Creation of the document content	Marta Caria
0.2	23/01/2024	First draft for revision	Marta Caria
0.3	12/06/2024	Review and corrections	Beatriz Barros
0.4	24/09/2024	Draft of dissemination, training and support activities per target group concluded	Beatriz Barros
0.5	04/10/2024	Second document draft for revision	Beatriz Barros
0.6	17/10/2024	Review and corrections of version 0.5	Sara Marques
0.7	24/10/2024	Corrections on organization and content	Beatriz Barros
0.8	05/11/2024	Final corrections and formatting	Beatriz Barros
1.0	24/02/2025	Final version for submission	Sara Marques

Executive Summary

This document constitutes the deliverable D2.1 "Dissemination, training and education plan" produced in the scope of Work Package 2 "Dissemination, Training and Support" of HealthData@PT project. This document outlines a comprehensive communication and dissemination strategy aiming at effectively reaching relevant stakeholders through a series of targeted actions. The primary objective is to raise awareness regarding the HealthData@PT action and, consequently, regarding the secondary use of health data under the European Health Data Space (EHDS) ecosystem, while educating citizens, data holders, data users and the health data access body (HDAB) staff about the infrastructure, function, relevance and goals of the HealthData@PT project.

The communication plan includes a detailed description of the main target groups, addressing their specific needs and interests. It also describes the planned communication activities for each group, including the channels and tools that will be used, key messages, and the branding and visual identity elements for consistent messaging. Furthermore, it provides a strategy to evaluate the effectiveness of the communication activities, along with a timeline that outlines tasks, deliverables, and milestones for the dissemination, training, and education activities contemplated throughout the HealthData@PT project.

Finally, this deliverable also presents risk mitigation strategies to address potential challenges that could hinder the success of the communication plan.

The approach proposed in this deliverable ensures a well-structured dissemination of information, along with a training plan, fostering engagement, awareness and collaboration in the scope of the secondary use of health data through the HealthData@PT, while preparing the national integration into the European Health Data Space landscape.

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Terms and Abbreviations

CoP	Community of Practice
D	Deliverable
DAAMs	Data Access Application Management System
EHDS	European Health Data Space
EHDS2	European Health Data Space for secondary use
EC	European Commission
EU	European Union
FAQs	Frequently Asked Questions
HDAB	Health Data Access Body
IT	Information Technology
M	Month
MS	Member States
SPE	Secure Processing Environment
SPMS	Shared Services of the Ministry of Health, Portugal
TEHDAS	Towards the European Health Data Space
TEHDAS2	Second Joint Action - Towards the European Health Data Space
WP	Work Package

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1. Introduction

1.1. HealthData@PT scope and main objectives

The HealthData@PT is a 4-year direct grant coordinated by the Shared Services of the Ministry of Health (SPMS) in Portugal, co-funded by the European Commission (EC) under the EU4Health 2021-2027 program. This project aims to establish the national infrastructure and the key elements needed to support the technical implementation of the future Health Data Access Body (HDAB) in Portugal, as outlined in the regulation for the European Health Data Space (EHDS) [1] concerning the secondary use of health data. The developments towards the technical implementation of the Portuguese HDAB are crucial for ensuring secure access and processing of electronic health data for secondary use purposes, while also preparing for Portugal's integration into the future cross-border data exchange infrastructure, the HealthData@EU. Additionally, HealthData@PT seeks to provide recommendations to improve the quality of electronic health data at the level of data holders, with the goal of enhancing the overall quality of health data for research and medical innovation purposes.

In summary, the general objectives of HealthData@PT are divided into three main areas:

1. **National infrastructure for the secondary use of electronic health data**: This comprises the deployment of a set of digital business capabilities. A data access application management system (DAAMs) able to receive, process, and respond to data requests within 2 months (for non-complex requests) will be developed. Likewise, a publicly accessible national health datasets catalogue to expose and list all the datasets available for secondary use purposes will be created. Finally, the groundwork for a secure processing environment (SPE) where authorized researchers, innovators, and policymakers can access and process anonymized/pseudonymized health data for their endeavours, under conditions aligned with the Article 73 of the EHDS Regulation proposal, and for the purposes stated in Article 53 will be performed.

2. **Cross-border access to electronic health data:** Develop the necessary components to connect Portugal's national infrastructure with the HealthData@EU, the mandatory European infrastructure for the cross-border exchange of electronic health data for secondary use purposes.

3. **Electronic health data quality improvement:** Develop and share recommendations and best practices to improve the quality of electronic health data and metadata at the data holder level (data source), since improved data quality is essential towards accurate and relevant studies based on data re-use.

The HealthData@PT action leverages from the preliminary work laid by the joint action "Towards the European Health Data Space" (TEHDAS) [2] and by the HealthData@EU pilot project [3], incorporating learnings and recommendations coming from these projects. Likewise, the technical developments and governance structure undertaken during HealthData@PT will also be aligned with the outcomes of important concurrent projects in the secondary use of health data landscape such as QUANTUM [4] and TEHDAS2.

Despite its digital health maturity, Portugal currently lacks a dedicated legal and governance body, as envisioned in the EHDS for the secondary use of health data – an HDAB. Therefore, HealthData@PT plays a vital role in the development of this body towards the successful Portuguese connection to the future HealthData@EU infrastructure. The HealthData@EU infrastructure for cross-border exchange of health data for secondary use will empower various actors to access health data, including public and private entities, non-profit organizations, and individual researchers. Access will be granted for the purposes stated in the Article 53 of the EHDS Regulation proposal [1], which include research, innovation, policy making, educational activities, patient safety initiatives, regulatory activities, and personalized medicine. The major goal of HealthData@EU infrastructure is to advance the secondary use of health data through the establishment of a single and regulated market for these ends. Such will be vital to unlock the potential of health data towards improving disease prevention and diagnosis, provide more precise and personalized treatment plans, provide better healthcare to citizens, and set improved health policies for a more robust health system that better meets population's needs.

1.2. Work Package 2: Objectives, main tasks and timeline

Within the HealthData@PT project, the Work Package 2 (WP2) "Dissemination, Training and Support" is focused on developing communication strategies and promoting education activities for citizens, data holders, data users and the HDAB staff on the functions and responsibilities held by the HDAB.

Therefore, the primary objectives of WP2 are:

- **Increase Public Awareness:** Conduct communication and education activities to raise awareness among data users, data holders and citizens about the existence, function, responsibility and importance of the HDAB, and the overall landscape of the secondary use of health data in the EHDS framework.
- **Provide Training and Support:** Develop training and support initiatives to equip HDAB staff, data holders and data users with the knowledge and skills they need

to make the best use of the infrastructure for secondary use of health data being established under HealthData@PT.

To reach the proposed objectives, WP2 is comprised of three main tasks:

Task 2.1 Dissemination – Targeted dissemination initiatives focused on promoting awareness of HealthData@PT goals and outcomes among citizens, data holders, and data users. These activities also aim to educate national key target groups on the structure and function of HealthData@PT and in how the infrastructure and framework developed under HealthData@PT fits within the EHDS ecosystem on the secondary use of health data.

Task 2.2 Education, training, and stakeholders' engagement – Development of specific training programs for HDAB staff, data holders and data users, to equip each stakeholder group with the necessary knowledge and skills for accessing and making use of HealthData@PT developed infrastructure for the secondary use of health data. This includes: i) providing data users with understanding on how to request, and be granted with data access permissions, along with the conditions for data use; ii) providing data holders with an overview of their role, functions, rights and duties under the HealthData@PT and EHDS framework, and iii) granting HDAB staff with up to date knowledge on how to develop, update and evolve the HealthData@PT infrastructure, according to the EHDS regulation, its implementing acts and considering European Commission (EC) recommendations. Additionally, this task includes the design and public dissemination of educational materials such as guidelines, instructions, leaflets, and manuals.

Task 2.3 Help Desk and Support – Establishment of a dedicated help desk service aligned with the EHDS proposal or the decisions of the temporary HealthData@EU governance body. This service will provide ongoing support to all stakeholders as they use the HDAB infrastructure.

The WP2 of HealthData@PT project comprises five deliverables, described in Table 1.

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Table 1. HealthData@PT WP2 Deliverables.

Deliverable Number	Deliverable Name	Type	Dissemination level	Due Date (Project Month)
D2.1	Dissemination, training and education plan	Plan	PU	M16
D2.2	Dissemination, Education and Training: Website	DEC – website. patent filings, videos, etc	PU	M5
D2.3	Dissemination, Education and Training Monitoring Report - Intermediate	Document report	PU	M39
D2.4	Dissemination, Education and Training Monitoring Report - Final	Document report	PU	M48
D2.5	MS Service Desk Plan	Other	SEN	M28

PU – public; SEN - sensitive

- **Deliverable 2.1** will outline the communication and dissemination plan for HealthData@PT project.

- **Deliverable 2.2** corresponds to the development of the HealthData@PT website, that will serve as a primary communication channel for all target groups. The website will host training and educational materials, and will be also used to disseminate HealthData@PT´s results and outcomes.

- **Deliverables 2.3** and **2.4** comprise monitoring reports to evaluate the progress and success of communication activities throughout the project at an intermediate (M39) and final phase (M48), respectively.

- **Deliverable 2.5** will outline the plan, means and implementation of the service desk to provide support to data users, data holders and HealthData@PT staff.

1.3.   Deliverable 2.1: Objectives and Target groups mapping

Within WP2, the deliverable D2.1 "Dissemination, training and education plan" outlines the communication and dissemination plan for reaching the HealthData@PT dissemination, training and education goals. This plan aims to define a set of dissemination, communication and training actions to ensure that the project reaches the relevant stakeholders using the most appropriate channels and tools.

The activities and key messages are intended to be targeted to the **main groups** involved in the HealthData@PT framework (Figure 1), namely:

1. **HDAB staff –** Technical teams of the competent authority of Portugal responsible for the technical implementation of the Portuguese HDAB. SPMS is the entity coordinating the HealthData@PT project, and therefore, responsible for the technical implementation of the Portuguese HDAB. Thus, SPMS is responsible for establishing and deploying the technical infrastructure of HealthData@PT, while also ensuring its future connection to the HealthData@EU. For this purpose, one of the main target groups of WP2 dissemination and training activities is SPMS staff ("HDAB staff"), comprising those directly involved in the deployment of the HDAB services throughout HealthData@PT project, and also SPMS staff in general towards raising awareness of this infrastructure in the EHDS for secondary use (EHDS2) ecosystem.

2. **Data users -** This project directly impacts researchers, regulators, innovators, and policymakers – all of those defined as "data users" as present in article 2 of the EHDS regulation [1] who will rely on the HDABs for finding and be granted with access to health data relevant for their endeavours. These users will benefit from a new Information Technology (IT) infrastructure, as well as structured and expedited procedures to access to health-related datasets through HealthData@PT. Therefore, a comprehensive set of educational materials and support activities is required to make this target group aware of the accessing conditions and procedures, and to ensure they hold the necessary knowledge to effectively make use of the infrastructure.

3. **Data holders -** The project will directly impact data holders in Portugal who are entitled to process personal electronic health data for the provision of their services or that have the ability to make available non-personal electronic health data [1]. Data holders are a key component of the EHDS2 ecosystem and HDAB operation as they are responsible for processing and making the health data specified in the data permit[1] accessible, upon data permit issuance by the HDAB. Besides, they will be required to provide detailed dataset descriptions (metadata descriptors). Therefore, educational resources and dissemination activities will be essential to ensure this target group is fully informed about their duties, the procedures required to make health data accessible in the EHDS2, and to provide health datasets that comply with established data quality standards.

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[1] Data permit: "*an administrative decision issued to a health data user by a HDAB to process the electronic health data specified in the data permit*" for secondary use purposes, according to the conditions set in the Chapter IV of EHDS Regulation Proposal [1].

Portuguese and EU citizens - Improved access to health data for research, medical innovation and health policies development (secondary use of health data), enables to leverage the potential of health data towards improved diagnosis and disease prevention, personalized medicine and for the development of more effective healthcare regulations, policies and services. Strengthening citizens´ knowledge on the European Health Data Space regulation for the secondary use of health data (EHDS2) is crucial to paving the way for such advancements. Therefore, educational resources and dissemination activities and materials will be essential to provide a knowledge base where citizens can obtain reliable and accurate information about the operationalization of secondary use of health data through HDABs and under EHDS2 landscape, its principles, applicable security and privacy requirements, and where they can also seek for information regarding their rights.
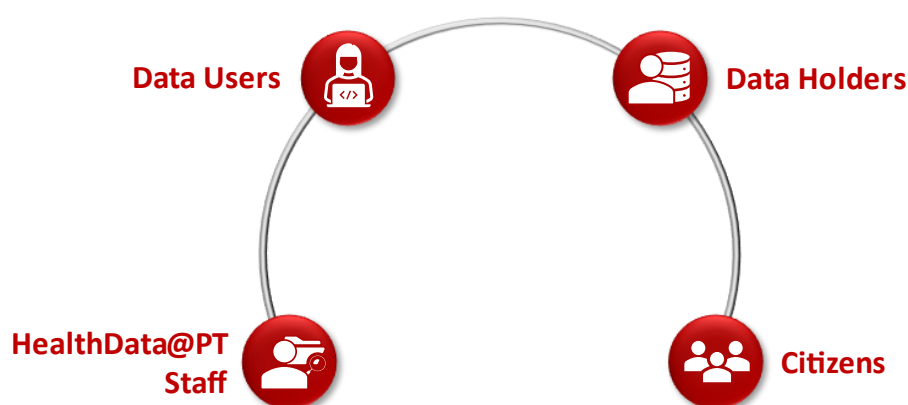
Figure 1. HealthData@PT target groups.

Given the diverse nature of the target groups abovementioned, a tailored and adaptive communication and education strategy will be employed to address the unique roles and needs of each group, as detailed in Section 2.2. This approach will involve the use of distinct activities and channels to achieve the desired outcomes for each group (detailed in Sections 2 and 3), ensuring that the message is effectively conveyed and received by the intended audience.

2. HealthData@PT Dissemination, training, and education plan

2.1. Objectives

In line with the primary objectives of WP2 described above, the dissemination, training, and education plan will aim, in a first stage, to promote awareness towards the infrastructure for the secondary use of health data developed during HealthData@PT project, its essential functionalities and impact. Subsequently, the set plan aims at informing both data holders and data users of their role in the EHDS2 infrastructure and about their corresponding responsibilities. Additionally, it will also be used to describe the services offered by HDABs regarding the provision of national and cross-border access to health datasets. Additionally, the communication activities aim to educate citizens on the secondary use of health data, its benefits and operationalization conditions, as well as to inform them on their rights regarding data privacy according to the existing regulations.

Considering the diverse abovementioned objectives, dissemination, training, and education activities will be directed to specific stakeholder groups (such as potential data users, data holders, citizens, patient organizations, healthcare providers, public health entities, among others), in order to inform and train all relevant parties involved in the EHDS2 ecosystem. Therefore, dissemination, training, and education efforts will include the deployment of educational and training programs and materials, and the coordination of training and support initiatives for HDAB staff, data holders, data users and citizens. These activities will include developing and delivering educational and training sessions, organizing and managing support programs and resources to assist and guide the identified target groups to be aware and provided with up-to-date information to effectively utilizing the services and resources related to national and cross-border health data access for secondary use purposes.

2.2. Target Groups Needs Assessment

Each identified target group within the HealthData@PT has unique needs related to their role in the HealthData@EU and EHDS2 ecosystem. These needs were identified to outline the outcomes expected from the HealthData@PT dissemination, training, and education plan, as summarised in Figure 2, and guide the development of dissemination, training, and education activities.
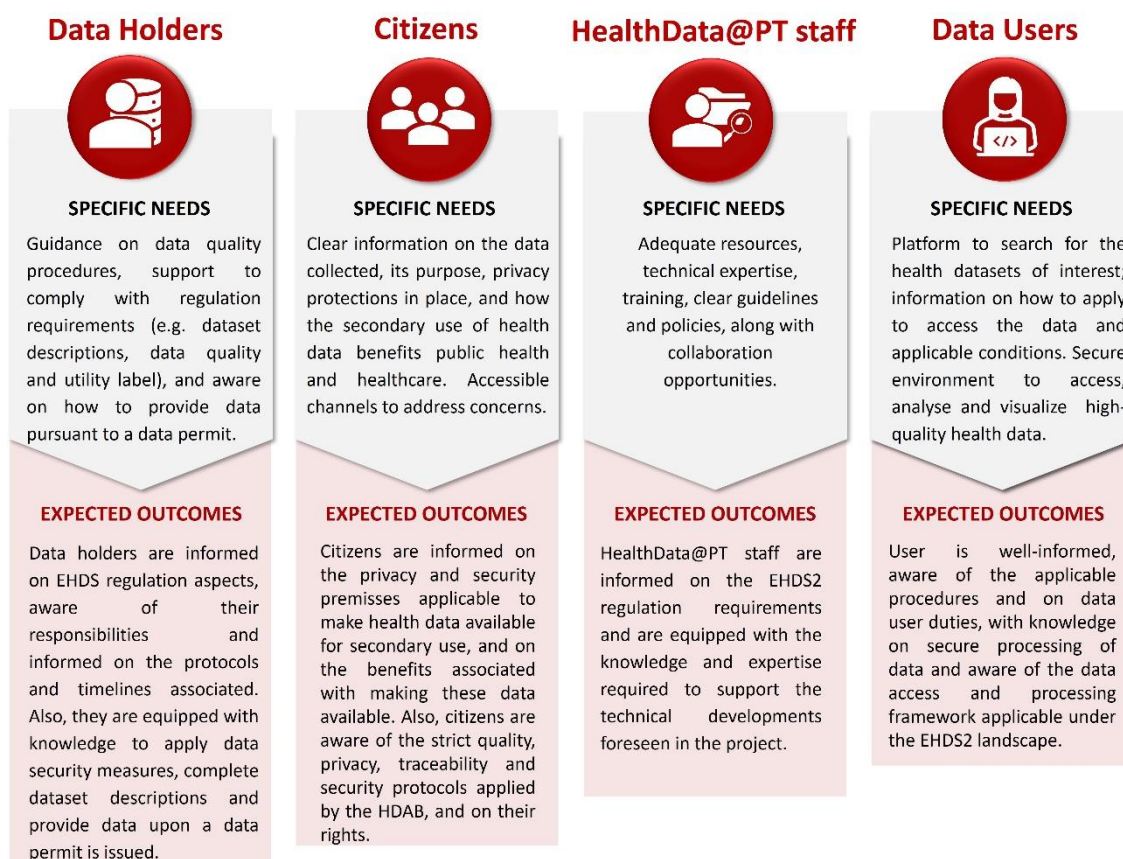
Figure 2. Identified needs and assessment of expected outcomes for each target group of HealthData@PT, to guide the outlining of the dissemination, training, and education plan.

2.3.   Timeline of tasks, deliverables, and milestones

Throughout the four-year project's duration, as established in the Grant Agreement, it is expected the delivery of reports, deliverables, and milestones, regarding the dissemination, training and education activities of the HealthData@PT. The activities for the project are structured across four key phases, each tailored to align with the project's milestones and the evolving landscape of the EHDS regulation (Figure 3). The plan ensures that relevant information is effectively shared with all stakeholders, promoting awareness, understanding, and collaboration.

1. Project Initiation - During the first year of the project, the communication strategy will focus on introducing the project and raising awareness about the secondary use of health data. Key activities will include:

- Presenting the project and its objectives,
- Creating awareness about the EHDS and its significance,
- Initiating technical meetings with project staff to align goals, and approaches,

- Sharing informative content on topics related to the development of the HealthData@PT infrastructure.

2. **Publication of the EHDS Regulation -** Once the EHDS regulation is officially published, communication efforts will shift toward educating stakeholders on its key aspects and implications for the secondary use of health data. Activities in this phase will include:

- Developing and disseminating informative content on the EHDS Regulation to the target audiences,
- Conducting technical meetings with staff involved in the deployment of the HealthData@PT digital business capabilities and organizational framework to ensure that the digital business capabilities align with the regulation's requirements,
- Sharing updates and progress on the infrastructure development to the target audience,
- Organizing educational sessions to address the questions and concerns from the various target groups,
- Participating in collaborative meetings with other Member States (MS) to align on the regulation's implementation.

3. **Preparation for the Implementing Acts** – anticipating the release of the implementing acts of the EHDS Regulation, expected for 2027, the communication plan will focus on clarifying their impact on the secondary use of health data. Key activities in this phase will include:

- Providing targeted information on what is being planned for the implementing acts and associated implications.
- Continuing technical meetings and workshops with HealthData@PT staff to guide the development of the national infrastructure.
- Sharing updates on the progress and results pertaining to the implementation of the HealthData@PT infrastructure.
- Conducting educational sessions on the implications of the implementing acts, while addressing the concerns of stakeholders.
- Participating in collaborative meetings with other MS to promote alignment and knowledge exchange.

4. **Project Conclusion -** As the project nears its completion, communication efforts will focus on showcasing the outcomes and ensuring the infrastructure its accessible and understood by all the stakeholders. Key activities will include:

- Presenting the final project outcomes and results,
- Providing guidance for data users and data holders on how to utilize the services comprised in the infrastructure,
- Informing the public about the infrastructure's role for discovering, accessing and processing health data for secondary purposes.

TIMELINE HEALTHDATA@PT COMMUNICATION PLAN

NOVEMBER 2023

DELIVERABLES

COMMUNICATION PLAN

D2.2 Dissemination, training and education plan: Website — 03/24

(1)
- Presentation of HealthData@PT action
- Create awareness for the secondary use of health data
- Share information regarding the European Health Data Space
- Initiate regular technical meetings with HealthData@PT staff
- Share informative content on topics related to the HealthData@PT infrastructure

2024

D2.1 Dissemination, training and education plan — 02/25

EUROPEAN HEALTH DATA SPACE (EHDS) REGULATION

2025

(2)
- Informing about the publication of the EHDS regulation
- Share the key highlights regarding secondary use of health data
- Develop informative content for target groups on the topics of EHDS Regulation
- Conduct technical meetings with HealthData@PT staff to guide the development of the HealthData@PT digital business capabilities
- Share information on topics related to the HealthData@PT developments
- Conduct education sessions on EHDS Regulation topics
- Address the questions and concerns of each target group
- Participate in collaborative meetings with other Member-States

D2.5 MS Service Desk Plan — 02/26

2026

D2.3 Dissemination, training and education plan monitoring report - Intermediate — 01/27

IMPLEMENTING ACTS FOR EHDS REGULATION

2027

(3)
- Informing about the publication of the Implementing Acts
- Share the key highlights regarding secondary use of health data
- Conduct technical meetings with HealthData@PT staff to continuously guide the national infrastructure development
- Share results and developments regarding the HealthData@PT infrastructure
- Conduct education sessions on Implementing Acts topics
- Participate in collaborative meetings with other Member-States

D2.4 Dissemination, training and education plan monitoring report - Final — 10/27

OCTOBER 2027

(4)
- Presentation of the HealthData@PT action outcomes and results
- Provide guidance on how to use the services and navigate the infrastructure for data users and data holders
- Inform the citizen on the infrastructure in place to find, request access and to process health data for secondary purposes

Figure 3. Overview of the timeline for the HealthData@PT´s dissemination, training and education activities plan, highlighting its alignment with deliverable due dates and anticipated deadlines for key events within the EHDS2 landscape.

3. Dissemination and Communication strategy

3.1. Key messages

In alignment with the HealthData@PT objectives detailed in the previous Section 2.1, the main goal of WP2 is to ensure, over the course of the project, the delivery of customized messages and content that address the specific needs and interests of each target group (Section 2.2). Since the HealthData@PT action includes a diversity of target groups, an effort is required to create and deliver personalised messages that resonate with the interests and priorities of the different target groups. These key messages will ensure that the dissemination and outreach plan aligns closely with the diverse interests, knowledge, concerns, and expectations of each target group. Considering this, the dissemination and outreach activities will be designed based on a set of key messages per target group, as presented in Table 2.

Table 2. Key messages outlined for each target group of HealthData@PT.

Target Group	Key messages to communicate regarding HealthData@PT infrastructure
Data Users	▪ **Improved Access to Data:** A centralized national platform with well-defined protocols will make health data more accessible and discoverable. ▪ **Improved Data Quality:** The recommendations and best practices to be provided to data holders will ultimately improve the quality of the health data that will be made available through HealthData@PT. Also, the deployment of the utility label as part of the datasets´ metadata will ensure transparency regarding the quality and utility of the datasets available. ▪ **Facilitated Cross-Border data access:** Connection to the HealthData@EU platform will enable multi-country access to data, towards more representative studies. ▪ **Accelerated Research:** An efficient and structured framework for health data access and management, that fosters improved health data quality and offers a secure infrastructure for data analysis can speed up the access to high-quality health data for secondary use purposes in comparison with the current procedures in place.
Data Holders	▪ **Increased Data Visibility and Impact:** Making data available through the national dataset catalogue will increase the visibility of the datasets, attracting new collaborators and researchers, potentially contributing to advancements in healthcare. ▪ **Improved Data Quality:** The recommendations and best practices developed by HealthData@PT project will help improving the data quality at the source, providing foundations for better data quality. ▪ **Enhanced Data Security:** The HDAB will implement robust security measures to protect the data made available by data holders, including the secure processing environment for data processing. ▪ **Advance Public Health Initiatives:** Data can be used to inform evidence-based policies and decision-making, leading to better public health outcomes.
HealthData@PT staff	▪ **Recommendations and best practices:** Guidance, resources and expert support will be provided through this project to address technical challenges and ensure successful infrastructure deployment. ▪ **Follow European Regulations and recommendations:** This project supports the alignment and compliance of the national HDAB infrastructure with European Regulations, specially the EHDS Regulation. ▪ **Collaboration opportunitie**s: Integration within the HealthData@EU european infrastructure provides opportunities for joint initiatives with other Member States, fostering knowledge

	exchange and synergy. Additionally, learning from the experiences of other countries can inform decision-making and help addressing common challenges.
Citizens	▪ **Data Privacy:** The project will develop a privacy- and security-by-design infrastructure with robust security, along with an organizational framework to protect citizens' personal data and rights. ▪ **Security safeguards:** The development of protocols, technical requirements and frameworks will assure that strict data privacy regulations and security measures are in place to prevent unauthorized access or misuse of health data, as well as to prevent citizens ´identification. ▪ **Contribution to Healthcare:** Citizens' data can contribute to improving health policies and health services that will ultimately contribute to improve the overall health and well-being of the population. ▪ **Improved Health outcomes:** The analysis of health data can contribute to groundbreaking research that leads to better treatments, diagnostics, and preventative measures.

3.2. Channels for communication and dissemination activities

The dissemination plan encompasses a multi-channel approach to achieve the project's communication and dissemination objectives (Figure 4).
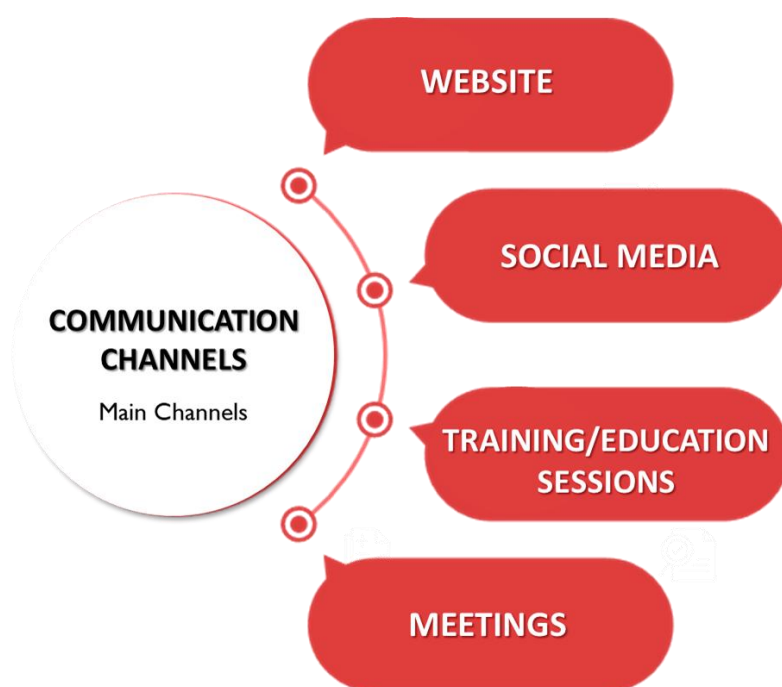
Figure 4. Channels for communication, dissemination and training activities during HealthData@PT project.

1. **Website:** A dedicated website of HealthData@PT (https://www.spms.min-saude.pt/healthdatapt/) has been established as the central hub for sharing and providing comprehensive information on the HealthData@PT project progress, providing details on all deliverables, milestones, and key public documents made available throughout the project duration. This website will also serve as a key

channel to promote dissemination of EHDS-related activities (such as webinars, workshops, and training sessions) to targeted audience groups including potential data users, data holders, citizens, researchers, and public health organizations, with the goal to foster increased engagement, and collaborative efforts. It will also provide updates on relevant advancements that may impact the project and the EHDS2 ecosystem, including information on significant deliverables from the HealthData@EU pilot project, documents related to the upcoming EHDS Regulation, and updates from other EHDS2-related European initiatives. Additionally, the website will be used to make publicly available a comprehensive collection of project-related documents, alongside communication materials such as graphics, brochures, booklets/flyers, and videos. It also includes a glossary to explain frequently used acronyms and terms associated with this project, along with a compilation of the most Frequently Asked Questions (FAQs). It should be noted that the website's menu components can be modified when necessary for achieving the communication and dissemination objectives (as detailed in D2.2 [5]). Sections, for instance, may need to be added or deleted to guarantee that the information provided on the website is easily fully understood by al users, regardless of age or degree of knowledge. The current main sections of the navigation menu bar are represented in Figure 5.
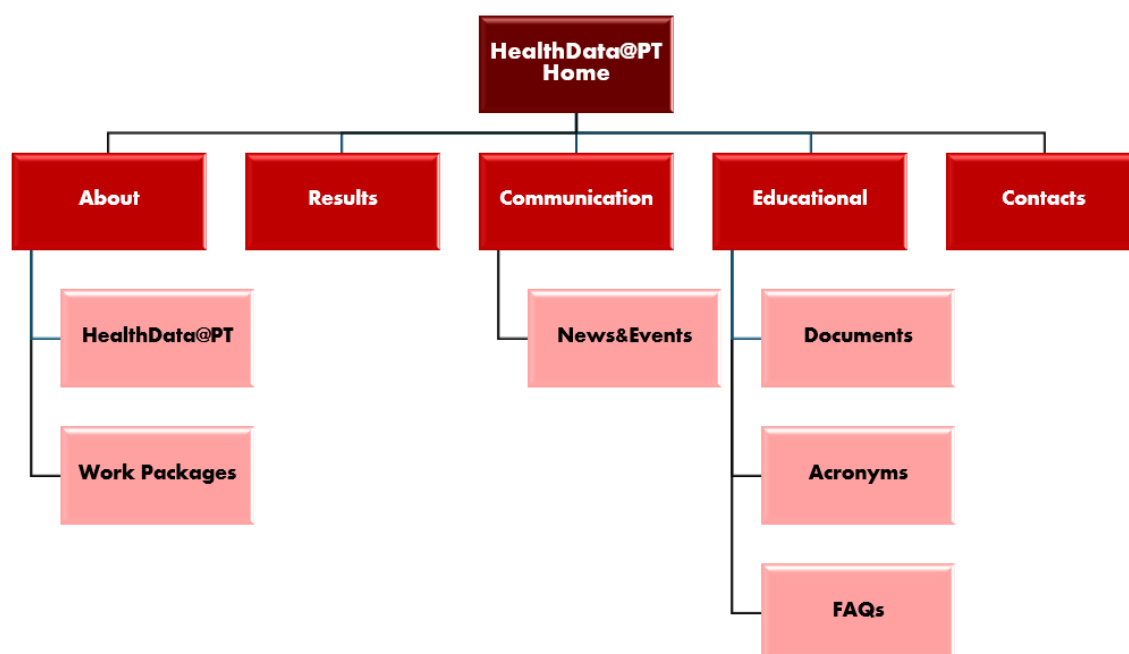

Figure 5. HealthData@PT website structure.

2. **Social Media:** HealthData@PT related content will be shared on the SPMS official LinkedIn page (https://www.linkedin.com/company/spms-epe/) to engage with the broad audience (citizens, healthcare professionals, researchers and public health institutions). Informative content will be shared on the progress HealthData@PT, EHDS regulation and overall secondary use of health data. Through the materials provided, and using engaging communication materials (graphics, videos), it is aimed to create awareness among the different stakeholders of the project. For instance, data users can stay informed on data access policies and on how researchers can utilize EHDS data for impactful discoveries. On the other side, data holders will gain insights into how their data can contribute to research as well as on their duties according to EHDS regulation, through publications, dissemination materials and upcoming events/training. Additionally, this channel will be used to inform the EHDS staff on new features, security updates, and best practices, as well as to announce upcoming workshops and training sessions. Finally, through this channel citizens can learn about the EHDS and HealthData@PT infrastructure, its potential for healthcare breakthroughs, and acquire knowledge on their rights through educational content. By tailoring and diversifying the social media content for each audience, we aim to build a well-informed and engaged HealthData@PT and EHDS2 community. An example of a social media post focused on the

secondary use of health data, published in this channel in August 2025, is provided in Figure 6.

3. **Educational/Training sessions:** Educational/training activities will include webinars and workshops. Initially, introductory sessions to establish a foundational understanding of the project and of the EHDS2 ecosystem, will be held, sequentially transitioning to webinars focused on ongoing updates to keep stakeholders informed of the project's progress. The webinar/training sessions

Figure 6. Example of a social media post published on the SPMS official LinkedIn page in the scope of HealthData@PT project, with contents in Portuguese and English languages.

themes will be tailored to the specific target audiences of the project. For data users, topics will be focused on explaining the framework and conditions for data access and processing, available data types, security measures in place, and overall protocols. For data holders, examples of topics include data holders' obligations, main framework for providing data upon a permit has been issued, data security practices, alongside data anonymization practices and organizational procedures to make data available according to a data permit. Regarding the HDAB and SPMS staff, webinars will be an opportunity to equip them with the latest updates on regulatory and governance processes, procedures for data integrity, quality, security and privacy. These webinars/sessions will be conducted either as private sessions with specific groups or SPMS teams, or in a more open format accessible to the public. For public sessions, pre-registration will be required through forms shared via the website, social media, and/or dedicated mailing lists. Finally, citizen-focused webinars will be helpful to introduce the EHDS framework, the concept of secondary health data use, and their rights over the processing permissions of their own data. Through this targeted approach, the goal is to maintain a well-informed and engaged HealthData@PT stakeholder community.

4. **Meetings:** Throughout the HealthData@PT project, a variety of internal and external meetings will serve as vital communication channels, promoting coordination, knowledge exchange, and alignment with the EHDS2 landscape and regulation. The project will incorporate regular internal meetings with all the HealthData@PT teams (HealthData@PT coordination group meetings) to discuss progress, synchronize on key developments, and align on the overarching strategies. Focused technical team meetings will also take place, focusing on each digital business capability. Overall, these sessions will offer opportunities for clarifying doubts, addressing challenges that may arise along the project journey, and align strategies. In addition to internal meetings, participation in external events - online and in-person conferences, workshops, webinars, and other relevant EHDS2 gatherings - will be essential. Collaborative sessions with other Member States, such as those held within the EHDS2 Community of Practice [7], as well as targeted meetings with relevant EHDS2 stakeholders, will also provide a way to communicate HealthData@PT advances and outcomes, and offer a platform to exchange knowledge and good practices, and to address common challenges towards complying with the regulatory requirements for developing the critical infrastructure and the digital capabilities for secondary use.

A more detailed and differentiated description of the different communication channels and corresponding impact on the project target groups is presented in the Section 4.

3.3. Brand, visual identity and templates

The official name of the project is HealthData@PT: Setting up a Health Data Access Body in Portugal and laying the national foundations for EHDS2, with the tagline "Laying down the foundations for the Health Data Access Body in Portugal" which clearly communicates the project's purpose - perform the groundwork necessary for the technical implementation of an HDAB in Portugal. The HealthData@PT logo consists of an icon and a wordmark (Figure 7), developed to symbolize trust, cross-border health data sharing, and easily identifiable trademarking. The manogram represents the concept of connecting health data cross-border. This aimed to include the meaning of connection from one point to another using dots to symbolising the health data sharing, as required for secondary use purposes. Based on the full logo, different graphic symbols and logo variations (for instance, without the tagline) were set to provide flexible applications for designing the project related communication items (Figure 7).

The chosen colour palette is based on red (and other related shares), white, and black (Figure 8) that serve as symbols to security and trust. The colour red symbolizes life, health and strength, and has also the effect of attention and motivation.
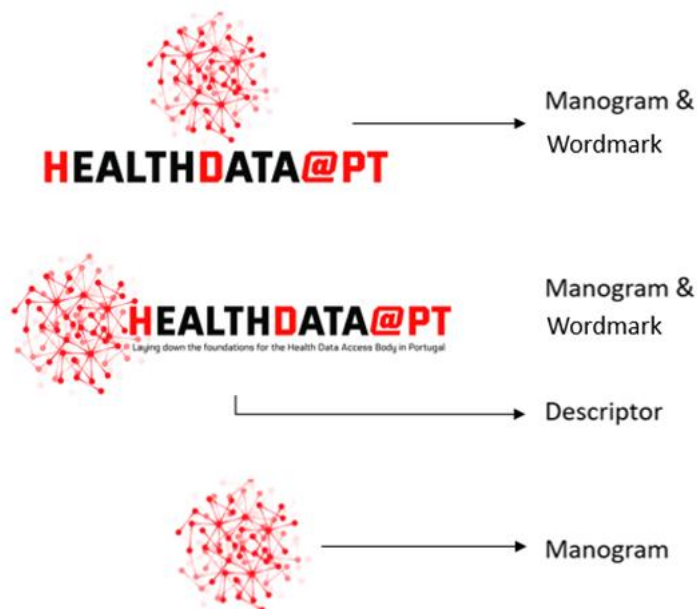
Figure 7. HealthData@PT Logotype composition.

The colour palette is applied consistently in all project visuals in the form of templates for several communication materials, such as presentations, social media posts and dissemination materials. This consistency enhances brand recognition, facilitates communication and outreach, and reinforces the project's message, making it more memorable and impactful for the target audience.
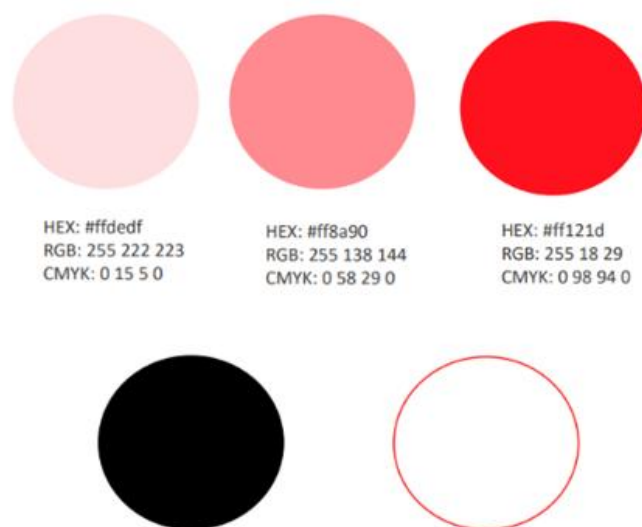

HEX: #ffdedf
RGB: 255 222 223
CMYK: 0 15 5 0

HEX: #ff8a90
RGB: 255 138 144
CMYK: 0 58 29 0

HEX: #ff121d
RGB: 255 18 29
CMYK: 0 98 94 0

Figure 8. HealthData@PT colour pallet.

3.1.1 EU co-funding logo and project disclaimer

The European Union co-funds the HealthData@PT action, therefore the grant agreement regulates the European Union elements that must be provided in any communication, dissemination and training activities related to this action, to highlight EU support. As stated in the grant agreement, these include the EU flag (emblem) accompanied by the funding statement "*The HealthData@PT action is co-funded by the European Union, EU4Health Program 2021-2027 under Grant Agreement Nr 101128332. The views and opinions expressed are those of the author(s) and do not necessarily reflect the position of the European Union or HaDEA. Neither the European Union nor the grant-awarding authority can be held responsible for these opinions*", as depicted in Figure 9. Therefore, all pages of the website include this information on the website footer.

The HealthData@PT action is co-funded by the European Union, EU4Health Program 2021-2027 under Grant Agreement Nr 101128332. The views and opinions expressed are those of the author(s) and do not necessarily reflect the position of the European Union or HaDEA. Neither the European Union nor the grant-awarding authority can be held responsible for these opinions.

Figure 9. European Union Co-Funding Logo and disclaimer included in all HealthData@PT´s communication materials and website.

3.1.2 Visual Assets

The project will primarily concentrate on digital communications and dissemination materials, such as visual content for social media, flyers, educational booklets, etc. Additional materials may be considered as the project advances. The main visual materials will be produced in both Portuguese and English, to ensure broader outreach. Some examples include:

- **Social media visuals –** Templates for social media publications.
- **PowerPoint presentation –** Template for all presentations regarding to the project. This template is used consistently in communications in internal and external meetings, physical and online events and in dissemination activities such as workshops and webinars.
- **Word templates –** Template for deliverables, meeting minutes and meeting minutes.
- **Flyer/Project info sheet –** Templates for communication materials.
- **Infographics –** Elements to be included in communication materials.

Examples of the HealthData@PT project templates are presented in Figure 10.
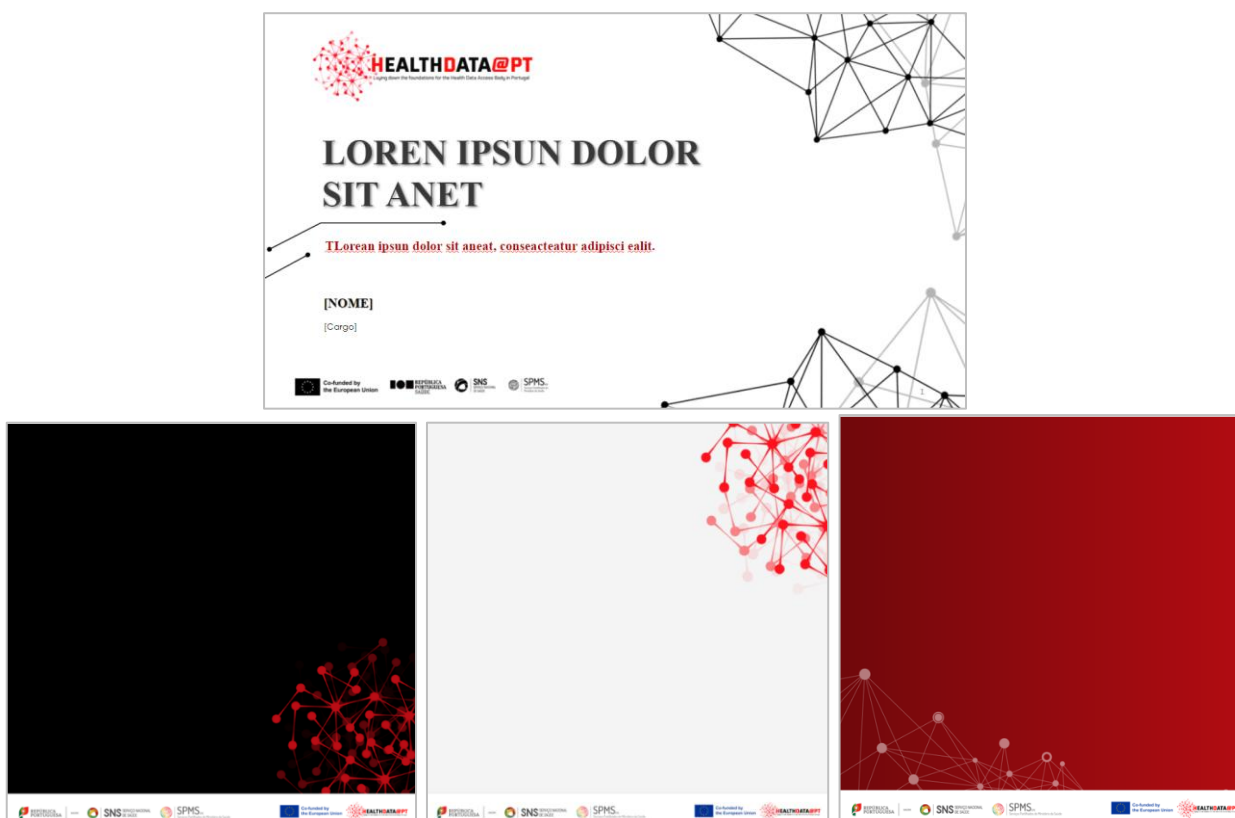
Figure 10. HealthData@PT templates for Power Point presentations (top) and for social media content (bottom).

4. Outreach and engagement strategy

Based on the objectives of HealthData@PT project and the diverse target groups involved, a comprehensive education and training plan was developed. This plan carefully considers the specific needs and roles of each target group to ensure effective capacity building throughout the project's duration. The education and training strategy accounts for several key events, deliverables and milestones over the four-year timeline, and was outlined also considering the concurrent significant developments in the EHDS implementation landscape, such as the publication of the EHDS Regulation and EHDS Implementing Acts (Figure 11). The alignment of educational activities with these events is essential to ensure timely and relevant dissemination and training activities for all stakeholders and was thus considered during the outlining of the dissemination, training, and education activities.
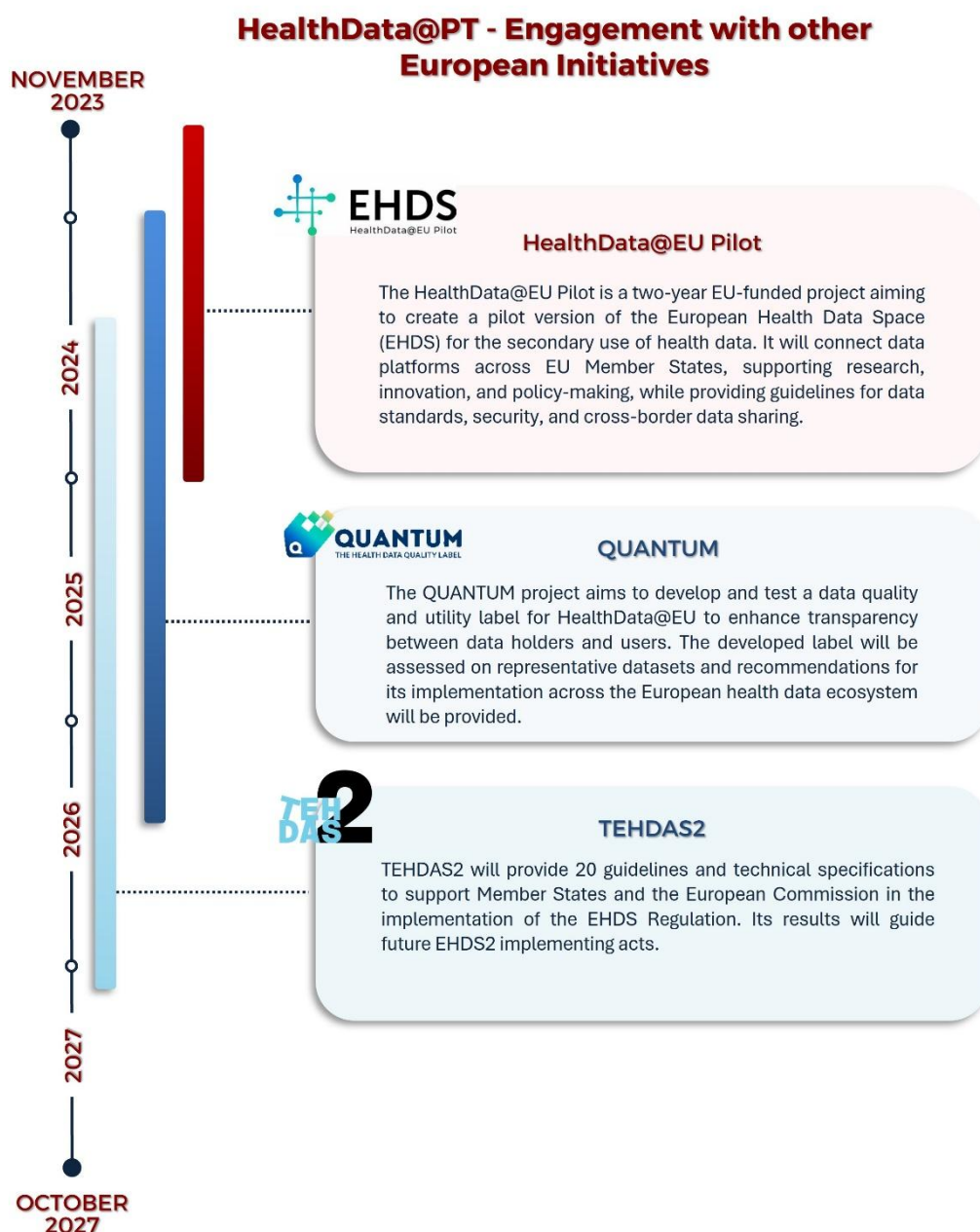
4.1. Engagement and alignment with other EHDS2-related initiatives

The communication and dissemination activities during HealthData@PT action includes establishing a link and knowledge exchange with other European projects in the scope of the EHDS2 such as the HealthData@EU pilot [3], TEHDAS2 [6], and QUANTUM [4]. HealthData@PT plan involves not only participating and following the updates and outcomes of the abovementioned EHDS2 relevant projects to gather relevant insights for EHDS implementation but also ensuring that the knowledge gathered reaches the identified target groups. Additionally, by aligning the HealthData@PT activities with the timelines of these European initiatives, updates will be provided effectively to the target groups at key moments. This approach shaped the structure and timing of the activities presented in Tables 3-6, ensuring that the dissemination activities occur as developments arise, allowing to promptly provide relevant knowledge to HealthData@PT target groups.

Additionally, the education and training plan includes following the meetings of the EHDS2 Community of Practice (CoP) [7], a collaborative group facilitated by the European Commission, which brings together representatives from each Member State involved in setting HDABs. The CoP aims to foster collaboration and exchange of best practices across MS on the necessary developments towards the secondary use of health data. In this context, active engagement in the CoP activities, such as participation in its meetings and workshops, are vital and were foreseen in the HealthData@PT dissemination, training, and education plan.

Altogether, these efforts will help keep the target groups of HealthData@PT informed on the last developments in the framework of EHDS2, while also ensuring that national

developments align with the recommendations, technical specifications, and developments being conducted at the European level. A detailed mapping of European projects contributing to the EHDS2 that overlap with the HealthData@PT's timeline is presented in Figure 11.

HealthData@PT - Engagement with other European Initiatives

HealthData@EU Pilot

The HealthData@EU Pilot is a two-year EU-funded project aiming to create a pilot version of the European Health Data Space (EHDS) for the secondary use of health data. It will connect data platforms across EU Member States, supporting research, innovation, and policy-making, while providing guidelines for data standards, security, and cross-border data sharing.

QUANTUM

The QUANTUM project aims to develop and test a data quality and utility label for HealthData@EU to enhance transparency between data holders and users. The developed label will be assessed on representative datasets and recommendations for its implementation across the European health data ecosystem will be provided.

TEHDAS2

TEHDAS2 will provide 20 guidelines and technical specifications to support Member States and the European Commission in the implementation of the EHDS Regulation. Its results will guide future EHDS2 implementing acts.

Figure 11. European Initiatives in the scope of the EHDS2 framework, with relevant outcomes for HealthData@PT, that overlap with HealthData@PT's timeline.

The specific activities planned for each target group, tailored to the communication channels, are detailed in Tables 3-6.

4.2. Dissemination, training and education activities for data holders

Several targeted activities have been designed for data holders to ensure they remain informed about key developments related to the EHDS2 regulatory framework. These activities will also highlight the progresses made and important outcomes from EHDS2-related European initiatives such as the HealthData@EU pilot [3], TEHDAS2 [6], and QUANTUM [4]. In addition to disseminating updates, these efforts will provide data holders with opportunities to offer insights, share concerns, and engage in discussions about solutions and new functionalities aimed at improving access to health data. Furthermore, the dissemination, training and education plan also predicts the creation of educational and training materials tailored to their specific needs. The detailed list of activities planned for data holders is presented in Table 3.

Table 3. Dissemination, training and education activities planned for Data Holders.

Target Group	Planned Activities		
	Type of Activity	Activity Topic/Subject	Communication Channel
Data Holders	▪ Informative Posts	▪ **Carrousel post** informing on the beginning of the project, its scope and main objectives, and presenting the dedicated website. ▪ **Carrousel post on the Secondary Use of Health Data:** A centralized national platform with well-defined protocols will make health data more accessible and searchable. ▪ **Carrousel post on the publication of the EHDS Regulation:** Informing about the publication of the regulation and main highlights regarding secondary use. ▪ **Carrousel post on the publication of the Implementing Acts:** Informing about the publication of the Implementing acts and main highlights for data holders. ▪ **Carrousel post** on current initiatives/projects to improve data quality and availability, informing about the development of the national and European metadata catalogue, strategies to improve data quality and interoperability, as well as on new algorithms, systems, and advances in the EHDS2 landscape (at national and EU levels).	▪ **Social media**
	▪ Informative materials	▪ **Flyer with information on the Secondary Use of Health Data:** Providing context on the secondary use of health data, its benefits, and share information on privacy protection and EU-related important initiatives. ▪ **Infographic:** Explaining the workflow for data access according to the EHDS Regulation. ▪ **Flyer about the Implementing Acts:** Key highlights from the EHDS Implementing Acts regarding Secondary Use of Health Data, impacting data holders. ▪ **Flyer/booklet with information on topics impacting data holders:** data quality procedures, data quality and utility label, interoperability, HealthData@PT and HealthData@EU infrastructures, etc.	▪ **Website**

Table 3 (cont). Dissemination, training and education activities planned for Data Holders.

Target Group	Planned Activities		
	Type of Activity	Activity Topic/Subject	Communication Channel
Data Holders	▪ Booklet	▪ **EHDS Regulation:** Summary of EHDS Regulation content directed to Data Holders, including topics such as: 　○ **Duties and responsibilities** 　○ **Data quality requirements** 　○ **Data access protocols** 　○ **Updating metadata on the metadata catalogue** ▪ **National Infrastructure to request and access health data:** Summary of the main functionalities of the national HDAB for data request and access, including the HDAB portal for data request, the national health data catalogue and the SPE for secure data analysis.	▪ **Website** ▪ **Social media**
	▪ Webinars	▪ **EHDS2 dedicated education session with Q&A:** Education session to expose the main requirements regarding the EHDS, data holders duties, and the national infrastructure for secondary use purposes, as well as the overall workflow. Discussion of the main questions by Data Holders. ▪ **HealthData@PT dedicated session:** Education session to expose the functionalities of the national infrastructure for data access for secondary use purposes. Discussion of the main questions by Data Holders.	▪ **Education/Training Sessions**

4.3.　Dissemination, training and education activities for Data Users

To support data users effectively navigate and utilize the digital business capabilities being developed as part of this project, and the HealthData@EU platform, several dissemination and training initiatives have been designed to ensure that this target group stays informed on the evolving landscape of the EHDS2 regulatory framework. These activities will highlight important outcomes from key European projects, including the HealthData@EU pilot [3], TEHDAS2 [6], and QUANTUM [4]. Likewise, these activities were planned so they can offer practical guidance to support users understanding the overall applicable framework, requirements and conditions to apply for and be granted with access to health data for secondary use purposes. Beyond providing regular updates and information, the planned activities are intended to foster a dialogue with data users, allowing them to share feedback, raise concerns, clarify doubts, and engage in discussions towards potential improvements related with health data access. In addition, tailored educational and training materials will be made available to enhance their ability to leverage these new tools and functionalities for their secondary use endeavours. The activities planned for data users are presented in Table 4.

Table 4. Dissemination, training and education activities planned for Data Users.

Target Group	Planned Activities		
	Type of Activity	Activity Topic/Subject	Communication Channel
Data Users	▪ Informative posts	▪ **Carrousel post** informing the beginning of the project, its scope and main objectives, and presenting the dedicated website. ▪ **Carrousel post on the publication of the EHDS Regulation:** Informing about the publication of the regulation and main highlights regarding secondary use. ▪ **Carrousel post on the initiatives to improve data quality and availability,** informing about the development of the national and European metadata catalogue and strategies to improve data quality and interoperability. ▪ **Carrousel post on the data access and request workflow according to the EHDS Regulation:** Informing about the workflow for data request and data access according to the EHDS Regulation and HealthData@PT infrastructure. ▪ **Carrousel post on the HealthData@EU infrastructure** and SPMS initiatives related with the European Digital Health transformation (progresses on HealthData@PT infrastructure for accessing data for secondary use).	▪ **Social Media**
	▪ Informative materials	▪ **Flyer on Secondary Use of Health Data:** Providing context on the secondary use of health data, its benefits, and share information on privacy protection and EU-related important initiatives. ▪ **Infographic/flyer:** Explaining the workflow for data request and data access according to the EHDS Regulation and HealthData@PT infrastructure, applicable conditions for the secondary use of health data, etc.	▪ **Website**

	▪ Booklet	▪ **EHDS Regulation:** Summary of EHDS Regulation content directed to Data Users, including topics such as:
		  o **Data access and data request**
		  o **What is a data permit**
		  o **Data analysis in a SPE**
		  o **Duties of health data users**
		  o **Multi-country request**
		▪ **National Infrastructure to request and access health data:** Summary of the main functionalities of the national HDAB for data request and access, including the HDAB portal for data request, the national health data catalogue and SPE for secure data analysis, along with information on the main workflow.
			▪ **Website**

	▪ Webinar	▪ **EHDS and HealthData@PT infrastructure dedicated session with Q&A:** Education session to expose the main requirements regarding the EHDS and the national infrastructure for data access for secondary purposes. Discussion of the main questions by Data Users.	▪ **Education/training sessions**
	▪ Survey	▪ **Needs assessment survey** directed to data users on topics related to the technical infrastructure for secondary use of health data. o Software tools in SPE for data analysis	▪ **Social media*** ▪ **Website***

		o National Metadata Catalogue ■ **Technical infrastructure Piloting:** Data users are invited to test the platform functionalities and provide feedback through usability surveys.	

* Channel for dissemination. The surveys can also be directed to specific partners and relevant institutions through a dedicated mailing list.

4.4.   Dissemination, training and education activities for Citizens

The primary goal of the communication activities aimed at citizens is to ensure they remain well-informed about all key developments related to the EHDS and the national HealthData@PT infrastructure. These efforts will focus on providing up-to-date and transparent information regarding the progress made within both European and national contexts, and the applicable conditions and safeguards. In addition to keeping citizens informed, the communication strategy includes the development of educational and training materials that address the secondary use of health data. These resources will highlight the potential benefits of such use, while also clearly outlining the rules and safeguards in place to ensure security, confidentiality, and data integrity. By fostering an understanding of these principles, the aim is to build trust and engagement among citizens as active participants in the health data ecosystem. The activities planned for citizens are presented in Table 5.

Table 5. Dissemination, training and education activities planned for Citizens.

Target Group	Planned Activities		
	Type of Activity	Activity Topic/Subject	Communication Channel
Citizens	▪ Informative posts	▪ **Carrousel post** informing the beginning of the project, its scope and main objectives, and present the dedicated website. ▪ **Secondary Use of Health Data:** A centralized national platform with well-defined protocols will make health data more accessible and searchable. What are the benefits for the citizen and how data is protected. ▪ **Carrousel post highlighting examples of projects/results enabled by secondary use of health data:** Informing about new algorithms/techniques/systems/laws potentiated or supported by the secondary use of health data. ▪ **Carrousel post on the publication of the EHDS Regulation:** Informing about the publication of the regulation and main highlights regarding secondary use, citizens´ rights and applicable conditions and safeguards. ▪ **Carrousel post dedicated to the security measures in place when researchers use health data:** Informing citizens on the data protection workflow and protocols to assure security and confidentiality.	▪ **Social Media**

	▪ Informative Content	▪ **Flyer Secondary Use of Health Data:** Providing context on the secondary use of health data, its benefits, and share information on privacy protection and EU-related important initiatives.
		▪ **Infographic/flyer on health data processing security protocols:** Explaining the data workflow (considering the HealthData@PT infrastructure) and procedures in place for confidential, secure and ethical processing of health data.
		▪ **Educational content related to the secondary use of health data**
		  o Key takeaways from EHDS Regulation
		  o Data security measures applied
		  o Benefits for the citizen
		  o Privacy protection
		  o Updates on the national infrastructure for data access
		  o Opt-in/opt-out
		▪ **Layman Report:** Publication of a document for stakeholders with non-technical expertise, to support the understanding of EHDS2 and HealthData@PT.
			▪ **Website**

	▪ Webinar	▪ Interactive session to inform the citizen on the types of health data collected, its purpose, and potential benefits, security measures in place to protect the data. ▪ Q&A on citizen concerns/ addressing privacy concerns.	▪ **Education/training sessions**

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4.5. Dissemination, training and education activities for HealthData@PT Staff

The communication activities designed for HealthData@PT staff are centred around comprehensive training sessions aimed at informing team members about the requirements set forth in the EHDS Regulation. These sessions will address the digital business capabilities that need to be developed throughout the course of the project.

In addition to these training initiatives, the communication strategy will include the dissemination of relevant outcomes from key European initiatives, such as the HealthData@EU pilot [3], TEHDAS2 [6], and QUANTUM [4], and insights from CoP meetings [7], with the aim of providing HealthData@PT staff with guidance for their technical and organizational work throughout HealthData@PT project. Regular meetings will also be held to facilitate discussions on the progress of the implementation plan and to enhance intra- and cross-teams alignment and streamline work organization. These efforts aim at promoting collaboration, alignment with regulatory requirements, and foster a shared understanding of the project's objectives and EHDS2 requirements. The tailored activities planned for HealthData@PT staff are presented in Table 6.

Table 6. Dissemination, training and education activities planned for HealthData@PT staff.

Target Group	Planned Activities		
	Type of Activity	**Activity Topic/Subject**	**Communication Channel**
HealthData@PT Staff	▪ Workshops and webinars	▪ Present and discuss specific topics related to the EHDS2 framework and with implementation of the HealthData@PT national digital business capabilities: ○ HDAD duties and timelines to comply with ○ Data access application management system ○ SPE development ○ Multi-country data access ○ National health datasets catalogue ○ Data quality improvement ○ Security and privacy-by-design framework ○ Ethics, data governance and sustainability	▪ **Education/Training sessions**
	▪ Technical internal meetings	▪ **Monthly meetings dedicated to discuss:** ○ **1st phase:** Implementation plan, EHDS Regulation requirements, HealthData@EU/HealthData@PT infrastructure. ○ **2nd phase:** Meetings dedicated to discussing the technical developments, resolve issues, promote knowledge sharing and to organize the work under development, to define operational and technical improvement needs, strategies and use cases	▪ **Meetings**
	▪ Collaborative meetings	▪ Participation in collaborative meetings with other Member-States, to share knowledge and best practices, address common challenges, and promote innovation	▪ **Meetings**

5. Work Methodology

To achieve the goals of the HealthData@PT WP2 (described in section 1.2), a work methodology has been developed that includes 4 main phases (Figure 12):

1) **Elaborating the dissemination, training and education plan** - This initial phase involves a comprehensive analysis of target groups, with identification of key messages, specific needs and desired outcomes for each targeted group in HealthData@PT. At this stage, the outline of a coherent approach to raise awareness and promote and advance knowledge is envisioned, which comprises training and education activities to support health data holders, health data users, citizens and the HealthData@PT staff. This plan, presented in this document, particularly in Tables 3-6, entails a strategic communication plan, with planned activities tailored to each target group needs, and detailing the communication channels and tools that will be used.

2) **Execution on the Communication, Dissemination and Training activities –** During this stage, the activities outlined in the dissemination, training and education plan will be implemented for each target group involved in the project, in alignment with the strategy and timeline defined. As the project progresses, the effectiveness of the plan will be monitored and evaluated, and the plan will be updated whenever needed, accounting for the release of significant outcomes that might be relevant for a strategy that is greater in scope.

3) **Monitoring** - Continuous monitoring will be carried out to guarantee that the dissemination, education and training plan is executed as planned and that the risks inherent to each activity are identified and handled effectively (Sections 6 and 7). Additionally, performance metrics will be utilized to assess the effectiveness of the dissemination, training and support efforts in keeping stakeholders informed and engaged with the project's progress.

4) **Reporting** - All activities, along with their corresponding monitoring metrics, will be systematically recorded and the monitoring results will be compiled and presented in two key deliverables: Dissemination, Education, and Training Monitoring Report – the intermediate version (D2.3, M39) and the final version (D2.4, M48). These reports will provide a detailed account of the materials produced and the activities undertaken throughout the HealthData@PT project, providing a comprehensive overview of the activities conducted, and allowing to assess the success of the outlined plan (D2.1) in achieving the expected outcomes for each target group. The

reports on dissemination achievements will be publicly available and published on the HealthData@PT website.

Figure 12. Communication and dissemination plan: work methodology.

6. Performance assessment of dissemination and training activities

The dissemination, training and education activities will be monitored and measured using performance metrics according to the different communication channels and type of activities conducted. Based on the activity mapping for each target group outlined in the previous section (Tables 3-6), we have established annual performance metrics for each communication channel, as detailed in Table 7.

Table 7. Performance metrics and target values for the dissemination and communication activities to conduct during HealthData@PT per communication channel.

Communication channel	Performance Metrics	Target Value			
		2024	2025	2026	2027
Website	▪ Number of informative contents uploaded (flyers, articles, booklets, deliverables/reports, and relevant documents added to the website)	4	2	5	13
	▪ Number of news and events shared (updates on project developments, key milestones, and upcoming events)	1	2	2	3
Social media	▪ Number of social media posts shared	4	6	6	6
Education/Training sessions	▪ Number of education/training sessions conducted	2	3	3	3
Meetings	▪ Number of internal meetings (technical team meetings with HealthData@PT staff, HealthData@PT coordination group meetings, meetings with relevant stakeholders in the EHDS2 landscape)	10	36	72	72
	▪ Participation in external meetings (online or face to face), conferences, workshops, webinars or events in the EHDS2 landscape	20	50	50	50

These metrics will be actively monitored on an annual basis to assess progress against the defined performance indicators (detailed in Table 7). An annual evaluation process will be performed, by comparing the defined target values for each communication

channel against the outcomes accomplished at the end of each year of the project: brief monitoring reports on dissemination, training and support activities will be produced at M13, M25, M37 and M46[2], as detailed in D3.1 report. This annual evaluation/monitoring approach will enable to identify areas for maintaining or improving the dissemination, training and support planned activities and their performance, and to ensure that the outlined plan remains adjusted to the evolving needs of all stakeholders.

The annual evaluation results will be compiled in the reports "D2.3 Dissemination, Education, and Training Monitoring Report – Intermediate" (which will compile the result until 2026), and "D2.4 Dissemination, Education, and Training Monitoring Report – Final". These reports will provide the source of verification regarding the accomplishment of the proposed metrics (Table 7). Likewise, these reports will provide comprehensive information on the monitoring results, and a detailed description and analysis of all the dissemination, education, and training activities conducted during the project.

7. Risk Management Plan

To ensure robust communication, stakeholder engagement, and the effective dissemination of project outcomes, the risks that can impact the project's dissemination, training and support objectives were identified, and tailored mitigation strategies were outlined. The identified risks (detailed below), the likelihood and impact of each risk, and the proposed mitigation strategies are aligned with the previously highlighted in the Grant Agreement.

Risk 1: Inappropriate Connection to National Infrastructures and Framework

- Likelihood: medium
- Impact: high

The project involves an IT infrastructure with multiple digital business capabilities and frameworks and requires data holders from different entities to be able to connect to this national infrastructure, which requires proper integration from technical, semantic, and organizational perspectives. Inappropriate or incomplete connections could hinder the seamless exchange of data and collaboration at national level and across the national boundaries.

Mitigation Strategy: To mitigate this risk, communication, dissemination and training activities will be conducted for the HealthData@PT teams, data holders and data users. By maintaining a steady flow of information and regular engagement with the key target

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[2] The last reporting period was set shorter to guarantee the gathering of data and the timely completion of the final overall evaluation report, which is due in M47, as detailed in D3.1 report.

groups, the project will enhance coordination and alignment across different infrastructures and frameworks.

Risk 2: Limited User and Data Holder Awareness of the HealthData@PT Infrastructure

- Likelihood: low/medium
- Impact: low/medium

There is a risk that data users may face difficulties discovering relevant datasets or may not have sufficient knowledge of the infrastructure and services developed as part of this project. This could result in underutilization of the system's full potential.

Mitigation Strategy: To address this risk, targeted training programs, promotional efforts, and communication activities will be deployed, as detailed in this document. These initiatives will be designed to increase awareness of the infrastructure, ensuring that data users are well-informed about the available resources and services. By actively promoting the project and offering accessible educational materials and training sessions, the team will improve the awareness about the HealthData@PT infrastructure and about data discovery and usage framework under this infrastructure.

Risk 3: Limited Interaction Between Data Users, Data Holders, and Health Data Access Bodies

- Likelihood: medium/high
- Impact: Medium

The lack of interaction between key stakeholders—including data users, data holders, and health data access bodies— or its inconsistency could hinder collaboration, as well as the effective use of the digital services developed during this project.

Mitigation Strategy: To mitigate this risk, the project will actively promote and present the services developed by HealthData@PT for the technical implementation of the Portuguese HDAB to both data holders and data users. This will be achieved through comprehensive training programs, as well as ongoing promotion and communication activities, as detailed in this document, to foster consistent engagement between all parties. By emphasizing regular communication and interaction, the project aims to ensure that stakeholders remain informed and can effectively utilize the deployed services.

Risk 4: Lack of engagement in the activities planned

- Likelihood: Medium

- Impact: High

The project faces potential challenges in securing sufficient participation from its varied target groups, whose engagement is essential for effective communication and for achieving the project's overall impact. With multiple target groups, each with distinct needs and interests, there is a risk that some stakeholders may not perceive the relevance of the planned activities or may not be reached effectively, leading to a lower level of engagement than anticipated.

Mitigation Strategy: To address this risk, the dissemination, education, and training plan outlined in this document began with an assessment to identify the specific needs and anticipated impacts for each target group, ensuring that the planned activities are tailored to align with each audience's unique interests and requirements. The strategy prioritizes early engagement and open, continuous communication to foster strong involvement across all stakeholder segments. Additionally, after each activity, feedback will be actively collected through satisfaction surveys evaluating content quality, material relevance, and the overall participant experience. This feedback will also capture suggestions for improvement, enabling ongoing adjustments to optimize the effectiveness of the planned activities and to better engage all target groups. Additionally, annual evaluation mechanisms will help monitor the progress towards the defined objectives for each target group. Through these evaluations, the effectiveness of dissemination, education, and training activities will be assessed, to allow for timely adjustments whenever needed, ensuring that activities remain aligned with target group needs and continue to foster engagement. Finally, to promote greater engagement, a broad geographical and across sectors representation both across and within target groups will be promoted. This diversity will enrich discussions and foster stronger connections between participants, ultimately enhancing engagement and the project's impact.

Risk 5: Challenges in Understanding Regulatory and Legislative Context

- Likelihood: Medium
- Impact: Medium

As the HealthData@PT project is based on the evolving EHDS Regulation, uncertainties are expected to arise regarding regulatory and legislative details. Furthermore, the expected development of national legislation around the secondary use of health data may add to the complexity, creating additional challenges for stakeholders in navigating this framework.

Mitigation Strategy: The dissemination, education, and training plan aligns with key milestones anticipated within the regulatory framework, such as the entry into force of the EHDS Regulation and the publication of implementing acts. This alignment ensures that stakeholders receive timely updates and have a clear understanding of all relevant regulatory and legislative matters concerning the secondary use of health data. Moreover, the plan is aligned and takes into account other European initiatives within the EHDS2, as outlined in Section 4. By participating in these initiatives, the HealthData@PT team can access the latest developments and insights and share this knowledge with HealthData@PT stakeholders to support their understanding of the evolving regulatory landscape.

The described risks and corresponding mitigation strategies will be continuously evaluated and used to adjust the drafted communication plan whenever needed to overcome any challenges that may arise.

8. Conclusion

The HealthData@PT project aims to perform the preparatory work for the design and implementation of a national Health Data Access Body (HDAB), along with its essential functionalities, to enable discoverability of health data, and the secure access and analysis of health data for secondary use purposes (research, innovation, and policy making).

This document presents a comprehensive dissemination, training, and education plan designed to support the communication activities throughout the project's lifecycle. It outlines the key target groups, their specific needs and the dissemination, communication and training objectives. To reach those objectives, this plan presents a set of detailed planned activities per target group. These activities were aligned with relevant timelines, such as the publication of EHDS regulation and the planned outcomes from EHDS2-relevant initiatives such as TEHDAS2 and QUANTUM. The communication channels that will be used, ranging from digital platforms to in-person meetings and educational sessions, were detailed in this document and were strategically chosen to reach the relevant stakeholders effectively, ensuring broad dissemination of information.

All the activities planned in this document aim at ultimately ensuring that each target group is well-informed regarding the secondary use of health data, the EHDS regulation, as well as on their role, duties and rights under the EHDS2 framework. Moreover, it aims to ensure that data holders, data users, citizens and HealthData@PT staff are aware on the developments performed throughout HealthData@PT project lifecycle.

On further, in this document, HealthData@PT's brand identity is also disclosed. The set brand identity aimed at maintaining a cohesive and professional image across all communication efforts.

In summary, this communication plan provides a roadmap for the effective dissemination of project outcomes, education of stakeholders, and training on the infrastructure and services being developed, ensuring that all target groups are well-prepared to utilize and benefit from the project's outcomes on advancing the secondary use of health data.

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