

# The Global Fund, Digital Health, and Human Rights<sup>1</sup>

## Overview

Digital technologies and Artificial Intelligence (AI) offer huge value for communities and civil society, for example, in scaling up access to quality health information and services, improving pandemic surveillance, and strengthening community-led monitoring. The Global Fund recognizes this potential and is one of the largest investors in digital health in low- and middle-income countries. It spends over US\$150 million annually to strengthen health information systems, improve the availability and quality of digital data, and provide digital tools for health workers, leveraging private sector partnerships to support its investments. For example, [digital X-rays are used with AI and telemedicine](#) to rapidly screen people for TB in rural or remote areas of countries including Cambodia, Pakistan, and Paraguay. These tools can save costs and screen and diagnose people with active TB cases in places where skilled radiologists are not available.

Civil society and community groups emphasize that digital platforms expand their ability to reach members of vulnerable groups, including HIV key populations. They recognize that digital platforms can offer valuable confidential communication channels, including through apps or direct messaging services on commercial platforms. These technologies, including telemedicine platforms, foster protection against stigma and discrimination that is often experienced at general population clinics, particularly for members of stigmatized groups. Digital platforms can more easily share health information, including the location of clinics, how to access mental health services, and testing and treatment information. Digital platforms may empower communities living with and affected by HIV, TB, and malaria, especially in contexts where communities experience healthcare services as disempowering, for example, by providing patients with real-time access to healthcare professionals. While new technologies transform national health systems, enhance public health surveillance, and offer new opportunities to promote individual health and well-being, they also present novel and, in some cases, unprecedented risks and challenges that are yet to be fully explored.

DEVELOPED COUNTRY  
NGO DELEGATION 

<sup>1</sup> Excerpted and adapted from Citro B and Meyer E. *The Global Fund, Digital Health, and Human Rights: A Study of Digital Risks and Institutional Capacity*. Internal Report. Developed Country NGO Delegation to the Global Fund Board; 2024 August.

# Study to Understand the Global Fund's Mandate and Capacity to Address Digital Health Rights

In 2024, the Developed Country NGO Delegation to the Board of the Global Fund commissioned a study to investigate the challenges that Global Fund communities and civil society experience in the digital health transformation, viewed from a rights-based perspective. The study further examined the Global Fund's mandate and capacity to address these challenges and identify opportunities to strengthen its approach to digital and AI technologies. The study also considered the benefits and advantages that digital technologies offer Global Fund communities. The study incorporated a literature and policy review, in-depth interviews with a range of Global Fund stakeholders, and critical analysis. The study uses the term "digital health rights" to refer broadly to the human rights impacted by digital and AI technologies that are central to ending HIV, TB, and malaria, building strong and resilient health systems, and preparing for future pandemics. These include the rights to health, science, non-discrimination, privacy, informed consent, physical integrity, and freedoms of speech and expression.

The study proposed 13 main recommendations and 30 sub-recommendations, and in September 2024, the Delegation launched the report during a closed, virtual webinar among Board constituencies, with four partner constituencies co-sponsoring the policy dialogue. Since then, the Delegation has advocated to put the digital health rights issues on the agendas and work plans of the three Global Fund Board Committees, and met with relevant Secretariat departments to hear perspectives on how the recommendations are being considered. Several recommendations were taken up by the relevant departments, while others were deprioritized for being too costly or politically risky in an uncertain funding environment. For example, updates to the *Digital Framework* are planned; the Technical Review Panel has expanded parameters of its updated terms of reference to include digital health expertise; and meetings with the Community, Rights and Gender (CRG) department have identified ways to improve technical guidance on digital health rights and strengthen digital aspects of safety and security work.

This brief aims to update the study's recommendations with a proposed timeline. We encourage Board constituencies, partners and allies to review the updated recommendations and consider signing on to the solidarity letter to move the issues forward at the Committee and Board levels.



**Sign-on / Solidarity Letter Here**

# Annex

## Recommendations

### Short-term Priorities (by mid-2026)

#### Secretariat

- Strengthen internal coordination on digital and AI technologies and digital rights

#### Office of Information Technology

- Reassess, update, and strengthen the *Digital Framework* and develop, with Board input, a *Global Fund Digital Strategy*, setting forth the objectives, processes, principles, and human rights commitments associated with the Global Fund's use and support of digital technologies for health

#### Political and Civil Society Advocacy (PCSA) Team (as part of External Relations and Communications (ERCD))

- Update and strengthen the *Advocacy Roadmap*, including community and civil society perspectives on human rights risks and governance of digital and AI technologies for health

#### Office of Information Technology

- Develop a Global Fund Biometrics Policy, (similar to the *Policy on the Processing of Biometric Data* of the International Committee of the Red Cross (ICRC)) that mandates an inclusive country-level decision-making process and ensures robust protection for biometric data collected or processed during Global Fund-supported programs

#### Office of Information Technology, Office of the Inspector General and CRG

- Update the definitions on privacy and non-discrimination under the 'five minimum human rights standards' to include reference to digital technologies

#### CRG

- Create a Digital Health Rights Checklist for the CRG Department's second-line review during Country Risk Management processes

#### CRG

- Publish a Digital Health and Human Rights Technical Brief in preparation for Grant Cycle 8, or ensure inclusion of Digital Rights in existing and future Technical Briefs

### **Secretariat**

- Augment the Modular Framework Handbook in preparation for Grant Cycle 8 with digital health rights and community-led digital health-focused modules, interventions, and activities and integrate digital health rights into the core lists of indicators

### **Board**

- Elevate the Board's engagement, expertise, and leadership on digital and AI technologies for health
- Ensure Board Members, Focal Points, and Board Committee Members possess sufficient knowledge about digital and AI technologies and their impact on human rights
- Initiate discussion among the Board's Strategy, Ethics and Governance, and Audit and Finance Committees on enhancing governance and oversight and providing strategic direction for the Global Fund's investments in digital and AI technologies to ensure optimal impact while protecting human rights and empowering communities and civil society in the digital health transformation

### **Ethics Office**

- Update the Global Fund's Ethics and Integrity Framework to address ethical challenges posed by digital and AI technologies for health

### **Technical Review Panel**

- Enhance the Technical Review Panel's expertise and capacity to evaluate the technical merit, strategic focus, and human rights impacts of funding requests involving digital and AI technologies
- Proactively recruit experts in digital and AI health technologies, data privacy and protection, and digital health rights for TRP membership, and integrate digital rights experts into the Equity, Human Rights and Gender group

### **Office of the Inspector General**

- Strengthen the Office of the Inspector General's capacity to promote good practice, reduce risk, and evaluate reports of human rights abuses related to digital and AI technologies in Global Fund-supported programming

## **Medium-term Priorities (by end-2027)**

### **CCM Hub**

- Update the Eligibility Requirements in the Country Coordinating Mechanism Policy to ensure CCM membership encompasses expertise and experience in digital and AI technologies for health and their impact on human rights

## **CRG**

- Proactively engage Global Fund Principal and Sub-Recipients, including civil society and community groups, to better understand and develop effective responses to the human rights risks they experience using digital and AI technologies for health and support the proposed Digital Strategy and policy processes

## **CRG**

- Integrate digital health rights into the Breaking Down Barriers (BDB) initiative, highlighting and developing programmatic responses to “human rights-related barriers” to HIV, TB, and malaria services stemming from the use of digital and AI technologies, as well as the laws, policies, and practices governing data protection and privacy

## **Secretariat**

- Fund digital health rights and community-led digital health-focused programming, including through existing Catalytic Investments, such as the Digital Health Impact Accelerator and recent Data Science, and prioritize in fundraising for future Catalytic Investments
- Dedicate funding for community engagement on digital and AI technologies as part of the Community Engagement Strategic Initiative (CE SI) to strengthen the engagement and leadership of communities most affected by HIV, TB, and malaria on the topic

## **Office of Information Technology and CRG**

- Ensure responsible, human rights-focused private sector engagement on digital and AI technologies including by developing and mandating the use of a Human Rights Impact Assessment or a tailored digital health rights assessment (noting the German Society for International Cooperation [GIZ] and Danish Institute for Human Rights’ Digital Rights Check) as a prerequisite for all contracts and partnerships with private sector health technology developers

## **Resilient and Sustainable Systems for Health (RSSH) Team**

- Expand section 4.9 on “private sector engagement and digital health” in the Resilient and Sustainable Systems for Health (RSSH): Allocation Period 2023–2025 Information Note to include a subsection under part B titled “Digital health rights and community-led programming” that recommends investments in programming to promote and protect human rights and support civil society and community groups around the use of digital and AI technologies for health

## **Technical Review Panel**

- Establish a new TRP expert group on “Digital Health and AI” and develop a TRP Digital and AI Technologies Advisory Paper to strengthen and optimize Global Fund investments using digital and AI technologies and ensure they protect and promote the human rights of communities affected by HIV, TB, and malaria

### **Office of the Inspector General**

- Build the capacity of OIG staff and consider recruiting new staff to strengthen the OIG's expertise in digital and AI technologies, data protection and privacy, and digital health rights

### **Office of the Inspector General**

- Consider an OIG Advisory Review of the use of digital and AI technologies in Global Fund-supported programming, building on the 2023 Audit of In-country Data and Data Systems but focusing on data protection and privacy, the safety, quality, and effectiveness of digital and AI technologies used in clinical and public health settings, digital and AI technologies' impacts on the human rights of communities affected by HIV, TB, and malaria, and the existence and sufficiency of existing policies, frameworks, and strategies to address these concerns

### **Technical Partners**

- Proactively engage the Global Fund's technical partners, including WHO, UNAIDS, UNDP, and others, to develop a Digital Health Joint Workplan to harmonize approaches to digital and AI technologies for health, considering existing normative guidance, risk mitigation, impact assessments, and other policy domains, and identifying and planning to fill gaps

## **Longer-term Priorities (by end-2028)**

### **Global Fund Partnership with the CCM Hub**

- Leverage CCMs and the Global Fund's broad convening power to promote meaningful participation of communities affected by HIV, TB, and malaria in developing digital health and data governance law, policy, and practices

### **Secretariat, with support from Technical Partners**

- Identify technical needs associated with the use of digital and AI technologies in Global Fund-supported programming at country and regional levels and engage and consider funding technical partners well-positioned to address them