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Online survey: Access to financial services for cancer survivors

Fields marked with *	are mandatory.
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Introduction

Welcome to the Survey on the Code of Conduct to ensure fair access of cancer survivors to financial services.

<u>Context</u> – Improving the quality of life of cancer patients and survivors: one of the main pillars of the Commission's <u>Europe's Beating Cancer Plan</u>.

The European Health and Digital Executive Agency (HaDEA), acting under the powers delegated by the European Commission, has commissioned Deloitte Consulting and Advisory BV to develop with relevant stakeholders a draft code of conduct on fair access of cancer survivors to financial services.

The purpose of the survey is to collect feedback on the current existing difficulties, hurdles and obstacles, experienced by cancer survivors when accessing financial services and products, and the reasons behind them. Furthermore, the survey aims at identifying the existing initiatives that may answer to the referred difficulties.

The questionnaire is structured as follows:

- section 1) gathers contact details and general information;
- sections 2) and 3) ask specific questions on the existing difficulties, if any, experienced by cancer survivors, the financial products concerned and the reasons behind those difficulties;
- sections 4) to 6) ask specific questions about the initiatives in place, if any, the supervision and compliance, and the impact of those initiatives for the problem in scope.

The estimated time to complete the survey is approximately 30 minutes. The survey will close on Sept, 22 The survey can be saved as a draft, and you can go back any time to the saved version before pressing the final 'submit' button.

In case of doubts or questions, please contact corfanidou@deloitte.com.

We greatly appreciate your participation, as your feedback is critical to the success of this project, and we thank you for your time and input.

Definitions and disclaimer on the terminologies used in the survey

"Health data" is defined for the purpose of this survey as "any data related to health conditions,

reproductive outcomes, causes of death, and quality of life for an individual or population".

"Cancer survivors" is defined as "people with a history of cancer".

"Long-term cancer survivors" would refer to two categories of cancer patients: (1) cancer patients in remission: partial remission (signs and symptoms of cancer are reduced) or complete remission (all signs and symptoms of cancer have disappeared), and (2) cured patients: patients whose life expectancy (since the cancer diagnosis) matches that of a sex- and age-matched general population e.g., 5 to 10 years depending on cancer type).

The evidence gathered through this survey, own research and stakeholder engagement activities will inform the terminologies used in the final deliverables that the survey contributes to as well as in the draft code of conduct on fair access of cancer survivors to financial services.

Disclaimer on the processing of personal data

Regulation (EU) 2018/1725 on the protection of natural persons regarding the processing of personal data by the Union institutions, bodies, offices, and agencies and on the free movement of such data, is applicable to the present survey. Before proceeding with responding to this survey, please take note of HaDEA's Data Protection Notice (DPN), attached below.

Europe's Beating Cancer Plan (europa.eu)

Download	
DPN.pdf	

Other

1. General information

* 5u	rname
	Delis
* Fir	rst Name
	Robert
* Na	me of organisation you represent
	European Society for Medical Oncology
* En	nail

Sw	itzerland
Contrib	oution given as:
(Only or	ne choice/answer is possible)
	Ministry Ministry
	Banking sector organisation
	Banking supervisory authority
	nsurer sector organisation
	nsurance distributor sector organisation
	nsurance supervisory authority
	Data protection supervisory authority
	Consumer organisation
	Cancer patients/survivors' organisation
	Academic/Research institution
V	Medical sector organisation
	Other
	cess to financial services by cancer survivors
Genera	al entre de la companya de la compa
Are lon by who	g-term cancer survivors treated differently from other customers? If so, in what context and m?
\(\) \(\)	/es
V	No
©	do not know / I do not answer
	specify for which financial products, and by which financial player (credit institution, insurer broker ediary, or insurer)

This is particularly so with regards to credit institutions, with whom it is extremely difficult to access the aforementioned services at a reasonable price. Cancer survivors also face challenges securing rental accommodation as insurance – which is difficult to acquire - is generally requested.

Cancer survivors are treated differently than 'regular' citizens when seeking to access financial products – e. g. insurance, mortgages or loans - and engaging with financial institutions like insurers, credit institutions.

Do long-term cancer survivors face difficulties/hurdles in the access to financial services and products?

0	Yes

O No

I do not know / I do not answer

Please specify:

It is extremely challenging to acquire insurance. Where this is feasible it is usually significantly more expensive and with much poorer benefits. Health related questions on insurer's questionnaires often pose difficulties for cancer survivors as they ask specific health related questions when assessing cost and cover for financial services and travel. Cancer survivors are required to inform insurers of any changes, including new medication, and the insurer will often exclude all cancer conditions, not just the existing disease. Such practices would heavily restrict younger people as mortgages are linked to health cover insurance in many countries, including the UK. There is an extra burden, along with present day, difficulties, like inflation, which affect younger people in particular.

For some loans, especially for purchasing houses, the banks request life insurance which is either very expensive or simply impossible to get. It is often the case that some banks require insurance to be taken out in order to provide a loan; a practice which discriminates against cancer survivors who struggle to acquire such insurance.

Do long-term cancer survivors need to provide any financial commitments or guarantees when	en
obtaining insurance or financial products?	

0	Ves

O No

I do not know/ I do not answer

If yes, what kind of commitments or guarantees?

In most of cases, cancer survivors simply do not have access or face limited options. However, when possible, cancer survivors are excluded from premium services, receive higher fares/penalties or higher copayments and are requested to present higher amount of paperwork. Cancer survivors are also requested for regular revision of health status through copy of medical record checkups and deliver medical records to the insurer to assess the risks.

Would you qualify these difficulties/ hurdles as:

0	Unfair access
	Discrimination
	Other
0	I do not know / I do not answer
Pleas	e specify:

Are you aware of initiatives being taken promoting fair access to financial services and products for cancer survivors?

Yes
163

No

I do not know / I do not answer

Please specify
To your knowledge, apart from cancer history, are there other treatable health conditions or chroni diseases which trigger similar difficulties in accessing financial services, which result in denial of
access to financial products and services?
Yes
O No
I do not know / I do not answer
Please specify:
Severe renal, cardiac, hepatic chronic disease (insufficiency, cirrhosis), benign conditions as a meningioma and some neurological diseases like dementia and parkinsonism.
To your knowledge, apart from cancer history, are there other treatable health conditions which trigger difficulties in accessing financial services or chronic diseases, which are being used to den access to financial products and services?
Yes
No
I do not know / I do not answer
Consumer organisation, cancer patients/survivors organisations, Academic/Research
institutions or Medical Sector Organisations
What are the hurdles with regard to retail financial consumers, who are cancer survivors, when wishing to acquire financial services and products?
Refusal of financial services and products
✓ High premiums
Pre-ticket boxes
Tying and bundling practices
Limitation in the amount, period and/or conditions for cover
Other
I do not know / I do not answer
Do you consider that financial institutions (banks/insurance companies/distributors) differentiate between cancer patients and cancer survivors ?
Yes
O No
I do not know / I do not answer
Please elaborate:

how (i.e service	
Please	elaborate:
Which I	health data is asked to consumers, regardless they have, or not, a history of cancer?
© Y	
⊚ I	
•	do not know / I do not answer
Please (elaborate:
	upload any additional documentation you want to share with us specify what this documentation is
3. Fin	nancial services and products
Consu author	mer organisations, cancer patients/survivors organisation and supervisory rities
What ar	re the groups of products for which cancer survivors have been reporting difficulties in
access	
_	Credit products
	nsurance products
	Payment products Pension products
	nvestment and savings products
_	Other

	None	
	☐ I do not know / I do not answer	
Cre	edit products	
Wh	nat types of credit products are reported to h	nave difficulties in access for cancer survivors?
	Direct Lance	
<u>!</u>	Private Loans	
	Mortgage loan (family home)	Mobile home loan
	Mortgage loan (second home)	Trailer, caravan or boat loan
	Renovation loan	Garden loan Green loan
	Reuse your mortgage for a new home loan	
	Loan for your home interior improvementsConsumer credit	
	Personal loan	☐ Holiday loan☐ Study loan
		Health loan
	Multipurpose loan Car loan	Other
	Electric vehicle loan	None
	Loan for a second-hand car	I do not know / I do not answer
	Motorbike or scooter loan	- Tab Not Know / Tab Not answer
	- Wolfield of Social loan	
Νh	nat types of credit products are reported to b	nave difficulties in access for cancer survivors?
••••	iat types of stout products are reported to .	
	Professional Loans	
	Bridging loan	
	Loan or credit for business	
	Mortgage loan for business real estate	
	Mortgage loan for business equipment	
	Professional loan	
	✓ Other	
	None	
	I do not know / I do not answer	
Ple	ease specify:	
ns	surance products	
	nat are the types of insurance products for w	which cancer survivors have been reporting
aifl	ficulties in access to?	
	Life insurance	
	Life insurance and/or disability insurance re	elated to a loan or credit for personal use

4. Exis	ting mechanisms/initiatives
	-
Please sp	ecify what this documentation is
Please up	load any additional documentation you want to share with us
	o not know / I do not answer
Oth	
	vel insurance
	urance for hospitalization and serious illnesses
Thi	rd party liability insurance
Dis	ability insurance
Ca	ncer insurance
	dividual) unemployment insurance
	dividual) occupational disability insurance
_	alth insurance
	es of insurance products are reported to have difficulties in access for cancer survivors?
□ I do	o not know / I do not answer
No	
Oth	ner
Ge	neral life insurance
Fur	neral insurance
_	ath insurance
	vate pension product
	e-financing of a debt balance insurance
	e insurance linked to mutual funds
	urance with a guaranteed return estment-based Insurance Products (IBIPs)
	e insurance and/or disability insurance related to a mortgage for a second home
	e insurance and/or disability insurance related to a mortgage for a first home
	e insurance and/or disability insurance related to a mortgage for a business real estate

General

Are you aware of any initiatives in place to promote / improve access to financial products for cancer survivors?

1	Legislation
	Self-regulation by the sector
V	Governmental non-legislative initiatives (e.g., National Code of Conduct, awareness campaign)
	No National Initiatives
	I do not know / I do not answer

Please specify:

Some European countries' central banks apply codes of conduct or have consumer protection bodies which seek to deal with the aforementioned challenges. However, this is far from uniform across Europe and, where recommendations do exist, they may not be mandatory nor apply to the whole of the national territory.

To date, France, Spain, Romania, Belgium, Luxembourg, the Netherlands, Portugal have adopted national initiatives to recognise the 'right to be forgotten' for cancer survivors while accessing financial services. Similar measures are now currently being discussed in Italy. However, the measures differ from country to country with significant variations between their practical operation.

- 1. Belgium: in place since 2019, 10 years after the end date of treatment or 5 years where the cancer occurred in those aged under 21. No age restriction. No limitation related to the amount covered by loans.
- 2. France: in place since 2016, 5 years after the end date of the treatment. No age restriction. Insurance amount not to exceed €420,000 for a real estate loan.
- 3. Luxembourg: in place since 2020, 10 years after the end date of treatment or 5 years where the cancer occurred in those aged under 18. No age restriction. Amount limitation €1 million.
- 4. Portugal: in place since 2022, 10 years after the end date of treatment or 5 years where the cancer occurred in those aged under 21. No age restriction. No limitation related to the amount covered by loans.
- 5. Romania: in place since 2022, 7 years after the end date of treatment or 5 years where the cancer occurred in those aged under 18.
- 6. The Netherlands: in place since 2021, 10 years after the end date of treatment or 5 years where the cancer occurred in those aged under 21. Age restriction of life assurance before age 71 and funeral insurance. No limitation related to the amount covered by loans.
- 7. Spain: legislation passed in July 2023 and comes into effect, 5 years after the end date of treatment without relapse.

Please specify:

There have been also some awareness raising campaigns in:

- 1. France https://www.e-cancer.fr/Actualites-et-evenements/Actualites/REGARD-SUR-le-droit-a-l-oubli
- 2. Belgium https://eucanbeatcancer.eu/2021/05/21/life-after-cancer-how-can-being-forgotten-be-a-good-thing/

implemented?			
Yes			
No			
✓ I do not know / I do not answer			
E 1 do not know / 1 do not answer			
Please specify why			
Legislative initiatives			
Scope of the legislation			
Which financial services and products are	oncompassed in the nation	al logislation?	
Credit products	encompassed in the nation	ai legislation:	
Insurance products			
Payment products			
Pension products			
Investment and savings products			
Financial services and products in gen	eral		
Other			
None			
I do not know / I do not answer			
Credit products			
What types of credit products are encompa	assed in the national legisla	tion?	
Private Loans			
Mortgage loan (family home)	Car loan	Energy loan	
Mortgage loan (second home)	Electric vehicle loan	Holiday loan	
Renovation loan	Loan for a second-hand	Study loan	
_ renevation roan	car	_ Olday loan	
Reuse your mortgage for a new home	Motorbike or scooter loar	Health Ioan	
loan	=		
Loan for your home interior	Mobile home loan	Other	
improvements Consumer credit	Trailer, caravan or boat	None	
— Jonsumer Great	loan	INOTIG	
Personal loan	Garden loan	I do not know / I do not	
		answer	
Multipurpose loan	Green loan		

What types of credit products are encompassed in the national legislation?

Professional Loans		
Bridging loan		
Loan or credit for business		
Mortgage loan for business real estate		
Mortgage loan for business equipment		
Professional loan		
Other		
None		
✓ I do not know / I do not answer		
Insurance products		
What types of insurance products are encompassed in the national legislation?		
Life Insurance		
Private pension product		
Death insurance		
Funeral insurance		
General life insurance		
Insurance with a guaranteed return		
Life insurance and/or disability insurance related to a loan or credit for personal use		
Life insurance and/or disability insurance related to a mortgage for a business real estate		
Life insurance and/or disability insurance related to a mortgage for a first home		
Life insurance and/or disability insurance related to a mortgage for a second home		
Life insurance linked to mutual funds		
Pre-financing of a debt balance insurance		
Other		
None		
I do not know / I do not answer		
What types of insurance products are encompassed in the national legislation?		
Non-life insurance		
Health insurance plan		
(Individual) occupational disability insurance		
(Individual) unemployment insurance		
Cancer insurance		
Disability insurance		
Insurance for hospitalization and serious illnesses		
☐ Travel insurance		
Other		
✓ None		

Cancer types and other dise	eases		
Which cancer types are cover	red by the national legislation?		
All cancer types	Hodgkin lymphomas	Chronic Myeloid Leukaemia (CML)	
Testicular cancers	Acute promyelocytic leukaemi /APL/AML3	ia Burkitt leukaemia/Burkitt lymphoma/ALL3	
Breast cancers	Lung Cancer	Adenocarcinoma of the prostate	
Skin cancer	■ Bladder Cancer	Adenocarcinoma of the prostate in active surveillance	
Cervical cancer	Stomach Cancer	All of the above	
Kidney cancer	Liver Cancer	Other	
Cancer of the colon and rectum	Pancreas Cancer	None	
Thyroid cancer	Pilocytic astrocytoma	I do not know / I do not answer	
covered? Infection by the HIV Viral hepatitis C Chronis Viral Hepatitis H Mucoviscidosis Diabetes Chronic rheumatoid arthu All of the above Other None I do not know / I do not a	CV Fibrosis score F3	on? If so, which other diseases are	
Nature of the legislation			
services and products, and ri	entail any rights for cancer survi ghts and/or obligations for finan	_	
companies?			
(Multiple answers possible)			
 Right not to declare cancer diagnostic Obligation to disclose history of cancer 			
	ny health-related information		
		way the applicant	
	al institution not to penalize in any	way the applicant	
	Maximum premium rates		
Anti-Discrimination law			
Other			

I do not know / I do not answer

NoneI do not know / I do not answer	
De concer curvivere need to provide	e any financial commitments or guarantees when obtaining
•	so, what kind of commitments or guarantees?
Cancer survivors are excluded from and are requested to present higher	premium services, receive higher fares/penalties or higher co-payments amount of paperwork.
	he financial institution or insurance company, will the latter aces? If so, which kind of penalties or consequences are ns?
	he financial institution or insurance company, will the latter ces? If so, which kind of penalties or consequences are ns?
 the existing mechanism for cancer s The age at the time of diagnosis The age from the end of a succ The age from the moment of a of the content o	s ressful treatment
None	
What is the age threshold applicable Before the age of 18 Before the age of 21 At the age of 18 or older At the age of 21 or older Other None	e to the existing mechanism?
forgotten'?	on of treatment are taken into account in the 'right to be
(Multiple answers allowed) No year threshold	5 years without relapse, in case of a certain age
Less than 5 years	10 years without relapse
5 years, in case of a certain age	_

☑ 10 years □ Other
■ More than 10 years ■ None
Less than 5 years without relapse
Are there any limitations in terms of the coverage amount for loans or insurance policies available to cancer survivors (e.g., loans not exceeding a certain amount, cumulation of loans)?
Are there any other specific conditions regarding the access to financial services or products for cancer survivors?
Yes, loan expiration conditions
Yes, repayment conditions
Yes, other conditions
□ No
Non-legislative initiatives
Scope of the non-legislative initiative
Which financial services and products are encompassed in the non-legislative initiatives?
Credit products
Insurance products
Payment products
Pension products
Investment and savings products
Financial services and products in general
Other
None
☐ I do not know / I do not answer
Cancer types and other diseases
Which cancer types are covered by the non-legislative initiatives?
All cancer types
Testicular cancers
☐ Breast cancers
Skin cancer
Cervical cancer
☐ Kidney cancer
Cancer of the colon and rectum
Thyroid cancer
Hodgkin lymphomas

Acute promyelocytic leukaemia /APL/AML3
Lung Cancer
■ Bladder Cancer
Stomach Cancer
Liver Cancer
Pancreas Cancer
Pilocytic astrocytoma
Chronic Myeloid Leukaemia (CML)
Burkitt leukaemia/Burkitt lymphoma/ALL3
Adenocarcinoma of the prostate
Adenocarcinoma of the prostate in active surveillance
All of the above
Other
None
I do not know / I do not answer
Are there any other diseases covered by the national the non-legislative initiatives? If so, which
other diseases are covered?
Infection by the HIV
Viral hepatitis C
Chronis Viral Hepatitis HCV Fibrosis score F3
Mucoviscidosis
☐ Diabetes
Chronic rheumatoid arthritis
All of the above
Other
□ No
I do not know / I do not answer
Nature of the non-legislative initiative
Does the national legislation entail any rights for cancer survivors when accessing financial
services and products, and rights and/or obligations for financial institutions or insurance
companies?
Right not to declare cancer diagnostic
Obligation to disclose history of cancer
Obligation to disregard any health-related information
Obligation for the financial institution not to penalize in any way the applicant
Maximum premium rates
Anti-Discrimination law
Other
□ None □ I de pet knew / I de pet enewer
□ I do not know / I do not answer

Details of the non-legislative initiative

Which age is considered to be the starting point for benefiting from the existing mechanism for		
cancer survivors?		
The age at the time of diagnosis		
The age from the end of a successful treatment		
The age from the moment of a complete remission		
Other		
None		
What is the age threshold applicable to the existing mechanism?		
Before the age of 18		
Before the age of 21		
At the age of 18 or older		
At the age of 21 or older		
Other		
None		
How many years after the completion of treatment are taken into account in existing mechanism for cancer survivors?		
(Multiple answers allowed)		
No year threshold		
Less than 5 years		
5 years, in case of a certain age		
10 years		
■ More than 10 years		
Less than 5 years without relapse		
5 years without relapse, in case of a certain age		
10 years without relapse		
More than 10 years without relapse		
Other		
None		
Are there any limitations in terms of the coverage amount for loans or insurance policies available to cancer survivors (e.g., loans not exceeding a certain amount, cumulation of loans)?		
Are there any other specific conditions regarding the access to financial services or products for		
cancer survivors?		
Yes, loan expiration conditions		
Yes, repayment conditions		
Yes, other conditions		
□ No		

Please specify what this documentation is
5. Supervision and compliance
Supervision on the national initiatives
Who is responsible for the supervision on the national initiatives in place? No supervision The sector
 The regulator The government or governmental bodies, including public prosecutor Other
Are there any enforcement mechanisms in place?
Compliance with the national initiatives
What are the consequences for financial institutions and insurance companies if they do not comply with the national initiatives?
Legal procedures
Supervisory measures
Penalties
Administrative sanctions
Other
Are you aware of any complaints or initiatives from cancer survivors, their representative organisations, and/or people with other pathologies, reporting difficulties to access financial services?
No
Are you aware of any court decisions related with the difficulties felt by cancer survivors, or people

with other pathologies, when accessing financial services and products?

No such actions have been observed. However, it represents a challenge from the moment when 'the right to be forgotten' was announced as it is subject to interpretation. In Spain, the legislative proposal does not

Please upload any additional documentation you want to share with us

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provide precise definitions on what constitutes personal data (especially in the context of health data), who has the right to request deletion of certain data items, and what are the acceptable methods for implementing this right. Rather, it appears that the responsibility to implement the law, and interpret the evolution of case law, sits with the courts.

	any financial institution or insurance company been sanctioned due to infringements to the
exist yet?	ing initiatives for warranting access to financial services and products for cancer survivors,
Pleas	se upload any additional documentation you want to share with us
Pleas	se specify what this documentation is
6. lı	mpact and evaluation
-	ou aware of any impact assessments, studies or evaluations available or ongoing on the nal initiatives regarding the access to financial services and products for cancer survivors?
0	Yes
0) No
0	I do not know / I do not answer
Pleas	se elaborate:
4	The right to be forgotten' report – 'Between expectations and practice'
	https://www.enisa.europa.eu/publications/the-right-to-be-forgotten

Do you believe such measures have had an impact: in terms of better access for cancer survivors, in terms of availability of products, in terms of pricing, in terms of risk sharing, on the financial institutions' portfolio? Please specify.

Once complete remission is declared, patients should be able return to their lives and be treated in the same manner as other people of similar age and socio-demographic characteristics with no cancer diagnosis. In order to do so, a uniformed approach to 'the right to be forgotten' is required to protect cancer survivors against discrimination regardless of their place of residence.

The current legislative situation remains fragmented as only some EU member states have introduced such initiatives - which vary significantly from country to country. Based on the existing reports and recommendations, there is an urgent need to prioritise 'the right to be forgotten' and define the exact standards, procedures, entities, responsibilities and rights for consumers as well as the penalties for organisations breaking the rules, in addition to Key Performance Indicators.

ESMO believes that such an outcome, which would also harmonise survivors' rights and providers' responsibilities, is deliverable by legislative action at EU level and looks forward to working with our Patient Advocacy Working Group to secure the rapid introduction of such legislation.

Please upload any	y additional documentation y	you want to share with us

Please specify what this documentation is	

Contact

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