Online survey: Access to financial services for cancer survivors

**Introduction**

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

**Context** – Improving the quality of life of cancer patients and survivors: one of the main pillars of the Commission’s [Europe’s Beating Cancer Plan](https://ec.europa.eu/health/topics/cancer_en).

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](mailto: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)

1. General information

• Surname
  Delis

• First Name
  Robert

• Name of organisation you represent
  European Society for Medical Oncology

• Email
  robert.delis@esmo.org

• Country
  Other
Please specify:

Switzerland

* Contribution given as:

(Only one choice/answer is possible)

- Ministry
- Banking sector organisation
- Banking supervisory authority
- Insurer sector organisation
- Insurance distributor sector organisation
- Insurance supervisory authority
- Data protection supervisory authority
- Consumer organisation
- Cancer patients/survivors’ organisation
- Academic/Research institution
- Medical sector organisation
- Other

2. Access to financial services by cancer survivors

General

Are long-term cancer survivors treated differently from other customers? If so, in what context and by whom?

- Yes
- No
- I do not know / I do not answer

Please specify for which financial products, and by which financial player (credit institution, insurer broker /intermediary, or insurer)

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. 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.

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

- Yes
- No
- I do not know / I do not answer
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 obtaining insurance or financial products?
- Yes
- 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 co-payments 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:
- Unfair access
- Discrimination
- Other
- I do not know / I do not answer

Are you aware of initiatives being taken promoting fair access to financial services and products for cancer survivors?
- Yes
- No
- I do not know / I do not answer
To your knowledge, apart from cancer history, are there other treatable health conditions or chronic diseases which trigger similar difficulties in accessing financial services, which result in denial of access to financial products and services?

- Yes
- 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 deny 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
- No
- I do not know / I do not answer

Please elaborate:
Regarding the use of health data, are consumers made sufficiently aware of which data is used, and how (i.e. based on which criteria), to assess their eligibility regarding the access to financial services and products?

- Yes
- No
- I do not know / I do not answer

Please elaborate:

Which health data is asked to consumers, regardless they have, or not, a history of cancer?

- Yes
- No
- I do not know / I do not answer

Please elaborate:

Please upload any additional documentation you want to share with us

Please specify what this documentation is

3. Financial services and products

Consumer organisations, cancer patients/survivors organisation and supervisory authorities

What are the groups of products for which cancer survivors have been reporting difficulties in access to?

- Credit products
- Insurance products
- Payment products
- Pension products
- Investment and savings products
- Other
Credit products

**What types of credit products are reported to have difficulties in access for cancer survivors?**

**Private Loans**
- [ ] Mortgage loan (family home)
- [ ] Mortgage loan (second home)
- [ ] Renovation loan
- [ ] Mobile home loan
- [ ] Trailer, caravan or boat loan
- [ ] Garden loan
- [ ] Reuse your mortgage for a new home loan
- [ ] Loan for your home interior improvements
- [ ] Green loan
- [ ] Consumer credit
- [ ] Personal loan
- [ ] Multipurpose loan
- [ ] Car loan
- [ ] Electric vehicle loan
- [ ] Loan for a second-hand car
- [ ] Motorbike or scooter loan
- [ ] None
- [ ] I do not know / I do not answer

**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

*Please specify:*

Insurance products

**What are the types of insurance products for which cancer survivors have been reporting difficulties in access to?**

**Life insurance**
- [ ] 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

Insurance with a guaranteed return

Investment-based Insurance Products (IBIPs)

Life insurance linked to mutual funds

Pre-financing of a debt balance insurance

Private pension product

Death insurance

Funeral insurance

General life insurance

Other

None

I do not know / I do not answer

What types of insurance products are reported to have difficulties in access for cancer survivors?

Non-life insurance

Health insurance

(Individual) occupational disability insurance

(Individual) unemployment insurance

Cancer insurance

Disability insurance

Third party liability insurance

Insurance for hospitalization and serious illnesses

Travel insurance

Other

None

I do not know / I do not answer

Please upload any additional documentation you want to share with us

Please specify what this documentation is

4. Existing mechanisms/initiatives

General

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

Self-regulation by the sector

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:

As far as you know, were any medical methods, data and evidence used to design the mechanism implemented?
- [ ] Yes
- [x] No
- [ ] I do not know / I do not answer

Please specify why

**Legislative initiatives**

**Scope of the legislation**

Which financial services and products are encompassed in the national legislation?
- [x] Credit products
- [x] 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

**Credit products**

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

**Private Loans**
- [x] Mortgage loan (family home)
- [x] Mortgage loan (second home)
- [ ] Renovation loan
- [ ] Reuse your mortgage for a new home loan
- [ ] Loan for your home interior improvements
- [x] Consumer credit
- [ ] Personal loan
- [ ] Multipurpose loan

- [ ] Car loan
- [ ] Electric vehicle loan
- [ ] Energy loan
- [ ] Holiday loan
- [ ] Study loan
- [ ] Motorbike or scooter loan
- [ ] Health loan
- [ ] Mobile home loan
- [ ] Other
- [ ] Trailer, caravan or boat loan
- [ ] I do not know / I do not answer
- [ ] Garden loan
- [ ] Green loan
- [ ] None
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
- [x] 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
- [x] 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
- [x] Life insurance and/or disability insurance related to a mortgage for a first home
- [x] 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

**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 diseases

Which cancer types are covered by the national legislation?

- [ ] All cancer types
- [ ] Hodgkin lymphomas
- [ ] Chronic Myeloid Leukaemia (CML)
- [ ] Testicular cancers
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above
- [ ] Acute promyelocytic leukaemia /APL/AML3
- [ ] Burkitt leukaemia/Burkitt lymphoma/ALL3
- [ ] Breast cancers
- [ ] Lung Cancer
- [ ] Adenocarcinoma of the prostate
- [ ] Bladder Cancer
- [ ] Adenocarcinoma of the prostate in active surveillance
- [ ] Skin cancer
- [ ] Stomach Cancer
- [ ] All of the above

Are there any other diseases covered in the national legislation? If so, which other diseases are covered?

- [ ] Infection by the HIV
- [ ] Viral hepatitis C
- [ ] Chronic Viral Hepatitis HCV Fibrosis score F3
- [ ] Mucoviscidosis
- [ ] Diabetes
- [ ] Chronic rheumatoid arthritis
- [ ] All of the above
- [ ] Other
- [ ] None
- [ ] I do not know / I do not answer

Nature of the legislation

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?

(Multiple answers possible)

- [ ] 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
Do cancer survivors need to provide any financial commitments or guarantees when obtaining insurance or financial products? If so, what kind of commitments or guarantees?

Cancer survivors are excluded from premium services, receive higher fares/penalties or higher co-payments and are requested to present higher amount of paperwork.

If a cancer survivor fails to inform the financial institution or insurance company, will the latter impose any penalties or consequences? If so, which kind of penalties or consequences are imposed, and what are the conditions?

If a cancer survivor fails to inform the financial institution or insurance company, will the latter impose any penalties or consequences? If so, which kind of penalties or consequences are imposed, and what are the conditions?

Details of the legislation

Which age is considered to be the starting point for benefiting from the specific rights foreseen in 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 the ‘right to be forgotten’?

(Multiple answers allowed)

- No year threshold
- Less than 5 years
- 5 years, in case of a certain age
- 5 years without relapse, in case of a certain age
- 10 years without relapse
- More than 10 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/AML
- Lung Cancer
- Bladder Cancer
- Stomach Cancer
- Liver Cancer
- Pancreas Cancer
- Pilocytic astrocytoma
- Chronic Myeloid Leukaemia (CML)
- Burkitt leukaemia/Burkitt lymphoma/ALL
- 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 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)?

☐ Yes
☐ No

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
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...
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.

Has any financial institution or insurance company been sanctioned due to infringements to the existing initiatives for warranting access to financial services and products for cancer survivors, yet?

Please upload any additional documentation you want to share with us

Please specify what this documentation is

6. Impact and evaluation

Are you aware of any impact assessments, studies or evaluations available or ongoing on the national initiatives regarding the access to financial services and products for cancer survivors?

- Yes
- No
- I do not know / I do not answer

Please elaborate:

‘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 additional documentation you want to share with us

Please specify what this documentation is

Contact
corfanidou@deloitte.com