

Strengthening Investment and Accountability in Digital Literacy and Human Rights

An analysis of ODA donors' current
digital strategies



Executive Summary

Digital technologies are transforming the global health landscape, presenting both opportunities and risks to human rights, especially for historically marginalised populations.¹ While digital tools can improve access to health information and services, reduce stigma, and increase autonomy, digital platforms also present risks, including inequitable access to technology, resulting in digital divides and exacerbating existing societal inequalities. Lack of effective governance and regulation of digital technologies has also led to a lack of protection for users.

Overseas Development Assistance (ODA) donors play a key role in shaping the digital health and rights agenda. This report analyses how seven ODA donors integrate digital health into their strategies, with a focus on digital empowerment, digital literacy, and human rights protections. The seven donors include four bilateral State ODA donors — AFD, FCDO, GIZ/BMZ, and USAID - the Gates Foundation, the Global Fund, and PEPFAR.² By reviewing their digital health policies and investments, the report aims to identify gaps and make recommendations to strengthen donors' digital health investments, accountability and alignment with human rights principles.

Qualitative research methods – including a desk-based literature review and in-depth interviews with ODA donors - were used to analyse seven donors' investments in digital health, digital empowerment, and digital literacy, in addition to their human rights oversight and accountability mechanisms.

1 S. Davis et al, 'Digital health and human rights of young adults in Ghana, Kenya and Vietnam: a qualitative participatory action research study' 2023 <https://gh.bmj.com/content/bmjgh/8/5/e011254.full.pdf>

2 USAID was active when research for this report was conducted, but has since been closed. We acknowledge that the Gates Foundation is not officially an ODA donor, but classify it as such throughout the report for the ease of the reader.

Key findings include:

Digital strategies, policies and investments

- **Limited prioritisation of digital health**

ODA donors are not adequately prioritising digital health in their portfolios. While four of the seven donors have stand-alone digital strategies, these apply across all development areas, not just health. At the time of writing, USAID is the only donor with a specific digital health policy.

- **Lack of tracking of digital health investments**

ODA donors do not sufficiently track their digital health investments. Only two donors - the Global Fund and USAID - of the seven track overall investment and none track specific investments into digital empowerment or digital literacy.

Digital literacy and empowerment

- **Lack of commitment to digital empowerment**

ODA donors are not making the commitments necessary to closing digital divides by increasing digital literacy and empowerment. None of the donors explicitly commit to digital empowerment in its full scope. Four donors - AFD, GIZ/BMZ, the Global Fund and USAID- support related concepts, but a comprehensive approach to equip communities with knowledge of their digital rights is missing across all donors.

- **Underdeveloped digital literacy initiatives**

The term and concept of digital literacy is more embraced but still underdeveloped. Only two donors – FCDO and USAID- make explicit commitments to digital literacy. The remaining donors have made equivalent or related commitments, often focusing on specific groups including young people, women and girls and key populations.

Human Rights

- **Limited integration of human rights in digital health investments**






While most donors have included commitments to human rights in their strategies, these have not applied to digital health programmes. Only GIZ incorporates a structured oversight mechanism for digital rights, and the remaining donors lack specific frameworks to monitor human rights in relation to digital interventions.

- **Inadequate accountability and oversight**

Four donors – AFD, FCDO, GIZ/BMZ and the Global Fund- have broad human rights oversight but often human rights are secondary concerns. No donor has a structured framework that requires an analysis of human rights within digital health programming.

Recommendations

To address these findings, the report makes a number of specific and cross-cutting recommendations for ODA donors to strengthen digital health initiatives and their alignment with human rights principles:

Cross cutting recommendations for ODA Donors	
	Develop, strengthen and implement digital health policies to address the opportunities and human rights risks associated with digital health interventions, through meaningful, long-term partnership with civil society and community groups in relevant countries.
	Track digital health investments and disaggregate data according to specific categories, including digital empowerment and digital literacy. Ensure that data is publicly available and accessible online, building on existing donor tracking mechanisms where appropriate.
	Strengthen strategic commitments to digital empowerment and digital literacy and support implementation through dedicated funding and detailed programmatic and technical guidance to develop individuals' digital skills and understanding of their rights.
	Establish and strengthen human rights accountability mechanisms to monitor the impact of digital technologies on specific human rights, including the rights to health, science, non-discrimination, privacy, and freedom of expression.
	Improve donor collaboration on digital health investments to strengthen coordination and share good practice.

ODA donors play a leading role in shaping the future for digital health and rights. To address the digital divide, empower communities, and protect human rights in the digital space, ODA donors must increase their investments and strengthen their commitments to digital literacy and empowerment, especially for young people and historically marginalised populations. At the same time, they need to apply their institutional human rights commitments to digital health interventions to ensure the safeguarding of human rights in digital investments.

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Acknowledgements

The report was conceptualised, developed and edited by Mike Podmore. Molly Pugh-Jones and Tabitha Ha developed and contributed to writing, and Brian Citro and Elise Meyers conducted the research and contributed to writing the report. Helen Parry copy-edited the report.

The authors gratefully acknowledge funding from Fondation Botnar and the University of Warwick. Mike Podmore benefited from a visiting fellowship at the Centre for Interdisciplinary Methodologies at University of Warwick during the research, as well as from conversations with Meg Davis.

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List of Acronyms

<i>Acronym</i>	<i>Full Term</i>
AFD	French Development Agency
AI	Artificial Intelligence
CRG	Community, Rights and Gender (Global Fund)
CTS	Country Technology Services (Global Fund)
DAP	UK Digital Access Programme
DHI	PEPFAR Digital Health Initiative
FCDO	UK Foreign, Commonwealth & Development Office
GIZ/BMZ	German Agency for International Cooperation / Federal Ministry for Economic Cooperation and Development
GF	Global Fund
GMD	Grant Management Division (Global Fund)
IATI	UK International Aid Transparency Initiative
ODA	Overseas Development Assistance
OECD DAC	Organisation for Economic Co-operation and Development – Development Assistance Committee
OIG	Office of the Inspector General (Global Fund)
PEPFAR	President's Emergency Plan for AIDS Relief
PMRD	Programmatic Monitoring & Risk Department (Global Fund)
RSSH	Resilient and Sustainable Systems for Health (Global Fund)
SIDP	UK Skills for Inclusive Digital Participation
USAID	United States Agency for International Development

Introduction

Through their policies and investments, Overseas Development Assistance (ODA) donors play a pivotal role in shaping the digital health and rights agenda. Their investment in digital empowerment and digital literacy, especially for marginalised groups such as young people and key populations, is important to bridge the “digital divide” and empower vulnerable communities. Effective oversight and accountability for digital health interventions are critical for good governance and the protection of human rights in the digital space.

This study examines bilateral and multilateral donors' relationships with digital technologies for health and development. Specifically, it reviews ODA donors' digital health policies and investments to understand their commitments to digital empowerment and digital literacy and the safeguarding of human rights in digital health investments. The research focused on seven major ODA donors; five bilateral State institutions, the Global Fund (a multilateral partnership-based donor), and the Gates Foundation (a private foundation). Based on the results, the study makes recommendations to enhance ODA donors' commitments and investments in digital empowerment and digital literacy, while strengthening human rights oversight and accountability for digital health interventions.

Background

Digital technologies are transforming our world, presenting both opportunities and risks to human rights, particularly for historically marginalised populations.³ The digital divide is a key issue, with approximately 2.9 billion people still offline and unable to access digital healthcare services.⁴ Women, girls, those in rural areas, low-income households or with limited education are disproportionately affected, perpetuating and deepening health inequalities.⁵

Digital transformations are increasingly recognised as determinants of health, profoundly impacting health and wellbeing.⁶ The COVID-19 pandemic accelerated the use of digital innovations in health, including information-sharing, access to services and disease surveillance.⁷ Communities also use technologies like social media and chat platforms informally to create support groups and share information.⁸

While digital tools can improve access to health information and services, reduce stigma, and increase autonomy, digital platforms also present risks. These include inequitable access to technology and supporting infrastructure (such as reliable internet connection), resulting in numerous digital divides and exacerbating societal inequalities. Furthermore, the lack of effective, transparent governance and regulation of digital technologies has resulted in a lack of protection for users, putting them at risk of issues such as surveillance and censorship, data privacy breaches, stigma and discrimination, and lack of access to services.

3 Ibid.

4 United Nations Social Development Network, '2.9 billion people still offline' <https://social.desa.un.org/sdn/29-billion-people-still-offline#:~:text=This%20comes%20as%20good%20news,cent%20live%20in%20developing%20countries>.

5 Digital Health and Rights Project Consortium, 'The Digital Transformation and the Right to Health of Young Adults in Bangladesh and Colombia: A Community-Engaged Study', 2024 <https://www.hhrjournal.org/2024/11/12/the-digital-transformation-and-the-right-to-health-of-young-adults-in-bangladesh-and-colombia-a-community-engaged-study/>

6 Ilona Kickbusch and Louise Holly, 'Addressing the digital determinants of health: health promotion must lead the charge', 2023 <https://academic.oup.com/heapro/article/38/3/daad059/7188360>

7 Budd et al, 'Digital technologies in the public-health response to COVID-19', 2020 <https://www.nature.com/articles/s41591-020-1011-4>

8 S. Davis et al, 'Digital health and human rights of young adults in Ghana, Kenya and Vietnam: a qualitative participatory action research study' 2023 <https://gh.bmj.com/content/bmjgh/8/5/e011254.full.pdf>

To reduce the digital divide, further investments to improve digital literacy and empowerment for young people and key populations are crucial. ODA donors have significant influence on development interventions through their strategies, policies and investments, and play a key role to addressing barriers to accessing digital technologies and improving digital literacy and empowerment.

It is not just what donors invest in, but also how they invest that shapes norms for the sector.⁹ This study analysed ODA donors' approach to digital health investments, mapping their strategies, policies and financial commitments. It focused on two key areas where donors can make a difference:- digital literacy and empowerment and protecting digital human rights in digital health programming. This report aims to highlight gaps in investment and prioritisation in these digital areas, encouraging ODA donors to use their influence to promote equity and protect human rights in future investments.

“Digital literacy”

The report adopts UNESCO's definition of “digital literacy” as “the ability to access, manage, understand, integrate, communicate, evaluate and create information safely and appropriately through digital technologies for employment, decent jobs, and entrepreneurship. It includes competencies commonly referred to as computer literacy, ICT literacy, information literacy and media literacy.”¹⁰ It also uses the term ‘digital empowerment’ to describe the knowledge, skills, and competencies people need to understand their rights, critically analyse power, use digital tools safely, and participate in the governance of digital technologies and artificial intelligence (AI).

“Digital empowerment”

Digital empowerment goes beyond digital literacy. While digital literacy focuses on the ability to access and use digital technology, digital empowerment encompasses understanding human rights in relation to digital technologies, engaging with the systems that govern digital technology; and taking action to influence governance and decision-making. Digital empowerment is vital for realising digital rights, which applies human rights, as enshrined by international law, to data and technology, including AI, for example the right to privacy or the right to freedom from discrimination.

Although many governments, companies and non-profit organisations are working to provide increased access to technologies, data and internet connectivity, significant gaps remain in digital literacy. These gaps hinder safe, informed use of digital tools and awareness of individual rights online. The Digital Health and Rights Project¹¹ consistently highlights these issues through its research and youth activities. Investment into digital literacy and empowerment was therefore a key focus of this study.

9 Charani et al, 'Fundrers: The missing link in equitable global health research' 2022 <https://journals.plos.org/globalpublichealth/article?id=10.1371/journal.pgph.0000583>

10 UNESCO, 'What you need to know about literacy', 2025 <https://www.unesco.org/en/literacy/need-know#:~:text=UNESCO%20defines%20digital%20literacy%20as,employment%2C%20decent%20jobs%20and%20entrepreneurship.https://digitalhealthandrights.com/>

11 <https://digitalhealthandrights.com/>

The UN Secretary General has called for a human rights-based approach to digital health to protect individuals' rights online and offline.¹² While communities and civil society have long advocated for digital health rights, greater political will and action are needed to ensure change. Effective oversight and accountability of ODA donors' digital health investments are critical for good governance and protecting human rights in the digital space.

This report is being published at a time of significant change in the global political and economic landscape; many ODA donors have reduced their contributions. Most significantly, USAID has been closed, with 83% of programmes being terminated under President Trump¹³, resulting in devastating consequences for global health. This research highlighted USAID as a leader in digital health strategies and digital rights. Despite the challenging funding environment, it remains critical to understand how donors address digital literacy, rights and accountability in their programming. The growing anti-rights movement, potential data breaches and the drive for efficiency through digital technologies and AI, further emphasise the importance of this research and its recommendations.

Study Design, Methodology and Limitations

This study used qualitative research methods to analyse seven donors' investments in digital health, digital empowerment, and digital literacy, in addition to their human rights oversight and accountability mechanisms. These methods included a desk-based literature and policy review, in-depth interviews, and analysis. Since the research was conducted, USAID has been closed. USAID remains included in the report as an important illustration of what was possible in US policy on digital technology.

The literature review analysed over 90 documents, including institutional policies, strategies, technical documents, and limited secondary source materials. This informed the development of interview questionnaires, tailored to individual donors. Five semi-structured interviews were conducted with seven ODA donor representatives via video conferencing. A list of the donor documents reviewed; participants interviewed; and example interview questionnaire are included in the Appendices.

Study limitations included challenges securing donors' participation in interviews, short study duration, restricted access to non-public data, and language barriers. Initially eight ODA donors were included but the Ministry of Foreign Affairs of the Netherlands (MFA) declined to participate, citing a lack of digital health programming in their portfolio. AFD and the Gates Foundation also declined interviews – AFD cited the transition of their focal point on digital health¹⁴, while the Gates Foundation cited the wide distribution of digital health across its portfolio, making it challenging to identify a focal person.¹⁵

Consequently, while the literature review included analysis of these donors' policies, it was not possible to interview either of these two donors. In addition, the study relied on publicly available documents and data, limiting access to internal financial investment and operational documents which would have enabled deeper analysis. Nevertheless, the study's findings provide important insights and recommendations relating to donor investments and practice.

12 Deepak Khazanchi and Mahima Saxena, 'Navigating digital human rights in the age of AI: challenges, theoretical perspectives, and research implications' 2025 <https://www.tandfonline.com/doi/full/10.1080/15228053.2025.2452028>

13 <https://www.visaverge.com/news/state-department-confirms-closure-of-usaid-after-months-of-cuts/>

14 Email from Perrine Bonvalet-Döring at AFD (26 June 2024).

15 Email from Himanshu Nagpal at Gates Foundation (2 June 2024).

Study Results and Analysis

Table 1 summarises the study's findings; more detailed analysis for individual donors is included in the Appendices.

Table 1: Overview of ODA Donors Digital Health and Development Priorities

ODA Donor	Digital Strategy	Digital Health Commits.	Digital Empowerment		Digital Literacy		Human Rights Oversight/ Accountability		Annual Investment Levels (USD)		
			Explicit	Equiv./ Related	Explicit	Equiv./ Related	Digital Rights	Human Rights	Digital Tech.	Digital Health	Digital Empow./ Literacy
France AFD	Yes	Yes	No	Yes	No	Yes	No	Yes	Unavail.	Unavail.	Unavail.
Gates Foundation	No	Yes	No	No	No	Yes	No	No	Unavail.	Unavail.	Unavail.
Germany GIZ/BMZ	Yes	Yes	No	Yes	No	Yes	Yes	Yes	Unavail.	Unavail.	Unavail.
Global Fund	No	Yes	No	Yes	No	Yes	No	Yes	n/a	≈150 million	Unavail.
UK FCDO	Yes	Yes	No	No	Yes	n/a	No	Yes	Unavail.	Unavail.	Unavail.
US PEPFAR	No	Yes	No	No	No	Yes	No	No	n/a	≈130 million	Unavail.
USAID	Yes	Yes	No	Yes	Yes	n/a	No	No	Unavail.	Unavail.	Unavail.
	57% Yes	100% Yes	0% Yes	57% Yes	29% Yes	71% Yes	14% Yes	57% Yes	71% Unavail.	71% Unavail.	100% Unavail.

Summary of Key Findings

Digital strategies, policies and investments

- **Limited prioritisation of digital health**

ODA donors are not adequately prioritising digital health in their portfolios. While four of the seven donors have stand-alone digital strategies, these apply across all development areas, not just health. At the time of writing, USAID is the only donor with a specific digital health policy.

- **Lack of tracking of digital health investments**

ODA donors do not sufficiently track their digital health investments. Only two donors - the Global Fund and USAID - of the seven track overall investment and none track specific investments into digital empowerment or digital literacy.

Digital literacy and empowerment

- **Lack of commitment to digital empowerment**

ODA donors are not making the commitments necessary to closing digital divides by increasing digital literacy and empowerment. None of the donors explicitly commit to digital empowerment in its full scope. Four donors - AFD, GIZ/BMZ, the Global Fund and USAID- support related concepts, but a comprehensive approach to equip communities with knowledge of their digital rights is missing across all donors.

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The term and concept of digital literacy is more embraced but still underdeveloped. Only two donors - FCDO and USAID- make explicit commitments to digital literacy. The remaining donors have made equivalent or related commitments, often focusing on specific groups including young people, women and girls and key populations.

Human Rights

- **Limited integration of human rights in digital health investments**

While most donors have included commitments to human rights in their strategies, these have not applied to digital health programmes. Only GIZ incorporates a structured oversight mechanism for digital rights, and the remaining donors lack specific frameworks to monitor human rights in relation to digital interventions.

- **Inadequate accountability and oversight**

Four donors - AFD, FCDO, GIZ/BMZ and the Global Fund- have broad human rights oversight but often human rights are secondary concerns. No donor has a structured framework that requires an analysis of human rights within digital health programming.

Digital Health Policies and Investments

Digital Health Policies and Investments

This section analyses donors' investment in digital health, empowerment, and literacy, deferring to donors' designations and definitions of these terms and categories.

Digital Health Policies

Of the seven ODA donors reviewed, four bilateral state donors — AFD, FCDO, GIZ/BMZ, and USAID - have stand-alone digital strategies that apply across various development areas, though not targeted specifically to health interventions. The other three donors— the Gates Foundation, the Global Fund, and PEPFAR — do not have digital strategies but incorporate digital health commitments within other policies.

AFD's *Digital Transition Strategy 2021-2025* focuses on three commitments: internet access for all; bringing key services online; and supporting the development of innovative companies. BMZ realigned its digital policy in 2022 with the German government's *Digital Strategy* (which includes a *Strategy for International Digital Policy of the Federal Government*), and emphasises protecting human rights online and offline. GIZ adopts a “digital-by-default approach,” requiring every project to incorporate digitalisation into its design. FCDO's *Digital Development Strategy 2024-2030* prioritises four objectives: digital transformation, digital inclusion, digital responsibility, and digital sustainability and an implementation plan is currently being developed.

USAID has a *Digital Strategy* and *A Vision for Action in Digital Health 2020-2024*. USAID's *Digital Strategy* focuses on two mutually reinforcing objectives: improving measurable outcomes through the responsible use of digital technology; and strengthening the inclusivity and security of digital ecosystems. *A Vision for Action in Digital Health* commits to strategic investments in digital technologies, including building country capacity in digital health and investment in national digital-health infrastructure.

The Gates Foundation's Global Health Division's strategy uses technology to reduce health inequities. The Global Fund has adopted an internal, unpublished *Digital Framework* that aims to leverage technology and innovation to end epidemics and fight diseases, focusing on data governance, data privacy and cyber security. PEPFAR has implemented the *Digital Health Inventory* (DHI) to track investment of PEPFAR-supported digital health activities.

Digital Health Investments

Only two of the seven ODA donors track their digital health investments — the Global Fund and PEPFAR - and none of the seven donors track investments in digital empowerment or digital literacy. However, three donors — AFD, FCDO, and GIZ/BMZ — have other kinds of online tracking platforms.

The key takeaway is that most donors do not track their digital health investments and even those who do struggle to capture data accurately and comprehensively. A key challenge is the difficulty identifying and separating expenditure on digital technologies as they are embedded within programming. Another challenge is that donors' existing frameworks to organise and classify investments rarely include separate categories for digital interventions, making it difficult to track them post-implementation. The three donors with other kinds of online tracking platforms do not include searchable classifications for digital interventions or digital health, and the platforms are not always updated. These donors have adopted the OECD Development Assistance Committee (DAC) "purpose codes" as their tracking platforms' primary classifications.¹⁶ However, the DAC codes do not contain categories for digital health - the term "digital" only appears in the OECD DAC purpose codes in the context of digital technologies for education.¹⁷ This limitation emphasises the need for better tracking tools for digital health investments.

The Global Fund reports approximately USD 150 million in digital health investments annually.¹⁸ However, it is unclear how they track these investments, and data is not disaggregated.¹⁹ PEPFAR invested approximately USD 130 million in digital health during the financial year 2023, as recorded by its DHI.²⁰ However, PEPFAR acknowledged the general fallibility of data monitoring models, emphasising that the DHI (first piloted in 2022) is still evolving, and does not fully capture their digital investments. The DHI focuses on PEPFAR's larger budget countries, called "bilateral operating units," which self-report investment data to PEPFAR but does not collect data from regional programs with smaller budgets. The reported USD 130 million for PEPFAR's digital health investments in 2023 is therefore based on self-reported data from 23 countries.²¹ Despite this limitation, the DHI is notable as the only publicly available institutional mechanism among seven ODA donors specifically designed to track digital health initiatives.

In 2021, BMZ launched its Digital Health Map, an interactive map showing all digital health solutions, sorted by country, type of solution and German implementing organisations supporting it.²² While the map lists the digital health projects and provides links to the project pages, the main feature is the geographic mapping. It does not provide information on financial investment levels or the total number of projects. In addition, the filters do not include categories like "digital empowerment" or "digital literacy." The map is intended to be "a living document" and updated

16 See OECD, *Evaluation Criteria* (12 May 2024), <https://web.archive.oecd.org/temp/2024-05-13/81829-daccriteriaforevaluatingdevelopmentassistance.htm>; OECD, *Purpose Codes: sector classification* (27 Mar. 2019), <https://web.archive.oecd.org/temp/2019-03-28/80638-purposecodessectorclassification.htm>.

17 <https://web.archive.oecd.org/temp/2024-06-19/57753-dacandcrscodelists.htm> (see the "Purpose codes" sheet in the OECD's "DAC-CRS-CODES" Excel file available [here](#)).

18 Interview with Rob Cryer at the Global Fund (29 May 2024); The Global Fund, *Three Examples of Technology and Innovation* (16 Oct. 2023), <https://www.theglobalfund.org/en/video/2023/2023-10-16-technology-and-innovation-transforming-health-care-in-rwanda/>.

19 We obtained this number during our Global Fund interview and then found the same figure on a webpage on the Global Fund's website discussing digital health interventions in Rwanda. We were unable to gather additional information about how the donor calculated this figure from either source.

20 Interview with two subject matter specialists at PEPFAR (25 June 2024); see also PEPFAR, *Welcome to the Digital Health Inventory Orientation Webinar*, p. 6 (30 May 2024), available at https://help.datim.org/hc/article_attachments/27060230742804.

21 PEPFAR, *Welcome to the Digital Health Inventory Orientation Webinar*, p. 6.

22 BMZ, *Launching the Digital Health Map* (4 Feb. 2022), <https://health.bmz.de/stories/launching-the-digital-health-map/>; see also BMZ, *German-supported digital health solutions worldwide*, <https://health.bmz.de/digital-health-solutions/> (accessed 11 July 2024).

regularly²³, however the interview with GIZ representatives highlighted that the map is not currently up to date but there are plans to update it shortly, along with possible format changes.²⁴

The FCDO's "Development Tracker" (DevTracker), GIZ's "Project Data" page, and AFD's "Open Data" page aim to provide detailed insights into donors' international development programmes, including the programme scope, countries, and financial information.²⁵ However, none of these tracking mechanisms include terms such as "digital," "digital health," "digital empowerment," or "digital literacy" within their search filter categories. Although the FCDO recently attempted to map its digital projects using the DevTracker, internal data, and International Aid Transparency Initiative (IATI) data, they were unable to do so.²⁶ The FCDO's systems are unable to segregate digital expenditure, making it difficult to understand their total investment in digital aspects of their programmes.²⁷ This highlights a significant gap in tracking mechanisms and the need for improved monitoring and reporting of digital investments.

23 *Launching the Digital Health Map, ibid.*

24 Interview with Karolin Herzog and Ute Jugert at GIZ (29 May 2024).

25 GOV.UK, *Development Tracker*, <https://devtracker.fcdo.gov.uk/> (accessed 8 July 2024); GIZ, *Project data*, <https://www.giz.de/projektdaten/region/-1/countries/> (accessed 11 July 2024); AFD, *Toutes les données de l'AFD*, <https://opendata.afd.fr/pages/accueil0/> (accessed 11 July 2024).

26 IATI, *International Aid Transparency Initiative*, <https://iatistandard.org/en/> (accessed 8 July 2024) ("IATI is a global initiative to improve the transparency of development and humanitarian resources and their results to address poverty and crises.").

27 Email from Zach Rubens at FCDO (8 July 2024).

Digital Empowerment and Digital Literacy Commitments

Digital Empowerment and Digital Literacy Commitments

Digital Empowerment

None of the seven ODA donors explicitly commit to digital empowerment. However, four — AFD, GIZ/BMZ, the Global Fund, and USAID — demonstrate commitment to related concepts, including calling for stakeholders' involvement in data governance, empowering healthcare workers through digital solutions, advancing safe use of digital technologies, and promoting digital skills for economic empowerment. The remaining three donors — FCDO, Gates Foundation, and PEPFAR — lack similar commitments to digital empowerment.

Overall, ODA donors have not fully embraced the concept of “digital empowerment” in their development priorities. A critical gap is the need to equip communities with knowledge of their rights in the digital space, with only GIZ empowering communities to take a critical approach to digital technologies. This highlights the need for increased commitment to empowering communities in the digital era.

AFD's *Digital Transition Strategy* includes three commitments to support digital transition.²⁸ The first focuses on universal access to the internet and its services and includes financing for “digital inclusion” projects. The Strategy defines digital inclusion projects in line with digital empowerment. These projects aim to strengthen partners' capacity to design online services by actively involving the most vulnerable populations in the process and providing training in basic digital skills, for example smartphone use, text writing, online payments, and personal cybersecurity practices. The Strategy also prioritises personal data protection in a manner consistent with digital empowerment, emphasising the need for stronger data protection institutions, civil society involvement in governance, and citizen education on data protection. Importantly, AFD's commitments to digital empowerment are not limited to a particular development area but apply across its entire portfolio.

BMZ's updated digital policy has two pillars.²⁹ The first commits to a social, environmental and feminist digital policy, built on three cornerstones. The first cornerstone promotes digital public goods and infrastructure to empower citizens in the digital sphere, while the third focuses on promoting digital skills to support young people's professional development. BMZ's digital policy is not limited to any specific sector but focuses on achieving the Sustainable Development Goals. The policy nonetheless highlights the following activity areas: “digitalized social systems, e-agriculture, e-health, Industry 4.0, smart energy, FinTech, e-commerce, e-government, and social media.”

GIZ prioritizes “digital competences” across sectors, promoting “digital skills” and “contextual knowledge” for young people, women, rural populations, and disadvantaged groups to help them use digital tools responsibly. For example, GIZ supports the “Digital Enquirer Kit Youth” project on behalf of BMZ, a self-study course that teaches children and young people how to identify misinformation, find and analyse reliable information online, and share it in a secure way.³⁰

28 *Digital Transition Strategy*, *supra* note 6, p. 4.

29 *Strategic realignment of the BMZ's digital policy*, *supra* note 7.

30 Digital Enquirer Kit Youth, *About*, <https://www.atingi.org/digitalkit-youth/about/> (accessed 9 July 2024).

The Global Fund's *Digital Framework* includes eight guiding questions to encourage a comprehensive digital approach across its entire portfolio.³¹ The seventh question asks whether the Global Fund is "supporting digital tools that empower patients with reliable access to information and provide equitable access to healthcare." Among the *Digital Framework's* objectives, "Amplify Access & Equity" aims to "promote universal coverage of quality healthcare for all by strengthening reach and security for the most vulnerable populations." It commits to promoting "digital solutions that empower frontline health workers to have greater access and impact to the populations." The Global Fund also provides capacity building on digital tools for a range of stakeholders, from Principal Recipients to community health workers, recognising that training is necessary and that "you can't just give a community health worker a mobile phone and say, 'there you go, get on with it.'"³²

USAID's *Digital Strategy* aims to "achieve and sustain open, secure, and inclusive digital ecosystems."³³ USAID defines "digital ecosystems" as comprising "the stakeholders, systems, and enabling environments that together empower people and communities to use digital technology to gain access to services, engage with each other, or pursue economic opportunities." One of the strategy's key pillars is empowering end-users of digital services and its commitments apply across all USAID Operating Units. USAID also makes specific commitments related to digital empowerment in the health sector. USAID's *Vision for Action in Digital Health* emphasises using digital technologies to empower different stakeholders, including frontline health workers, policymakers, and under-served populations beyond the reach of formal health services. During the interview, USAID shared that it was gathering feedback on its draft *Digital Policy 2024 – 2034*, and was considering ways to integrate commitments to digital empowerment into this new policy.

Digital Literacy

Only FCDO and USAID have explicit commitments to digital literacy, but the remaining five donors have made related commitments.

The concept of "digital literacy" is more widely embraced among ODA donors than digital empowerment, although it remains underdeveloped. Notably, only the two English-speaking bilateral State donors (FCDO and USAID) use the term "digital literacy", suggesting this may be a terminology issue. For instance, FCDO includes digital literacy as part of its broader focus on "digital inclusion." Although AFD also funds "digital inclusion" projects that align with digital literacy concepts and activities, it does not use this precise term. The most commonly used term by ODA donors associated with digital literacy is digital "skills," referred to in the strategies of four of the seven donors. Several donors prioritise specific groups for digital literacy, such as young people, women and girls, and vulnerable populations. The two health-focused donors - the Global Fund and PEPFAR - have the most narrowly defined digital literacy-related commitments, focusing primarily on strengthening health workers' capacity to use digital technologies. Only two donors — FCDO and the Gates Foundation — consider safety or responsibility in digital literacy.

31 *Digital Framework Design*, *supra* note 15, pp. 9, 14.

32 Interview with Rob Cryer at the Global Fund (29 May 2024).

33 *Digital Strategy*, *supra* note 12, p. 4.

"Digital literacy" is a key focus of FCDO's *Digital Development Strategy*, appearing over ten times³⁴ and a core aspect of its "digital inclusion" objective. The Strategy highlights that digital inclusion requires people to have the "digital (functional, technical and behavioural) and literacy skills" necessary to engage safely in the digital world, including "digital hygiene skills" and capacity for "local content self-creation." It also connects digital literacy to two other objectives on "digital transformation" and "digital responsibility." FCDO's flagship "UK Digital Access Programme" (DAP) embodies the Strategy's digital inclusion objective³⁵ reaching over 10 million people in five countries. A new phase is expanding to new countries, with a focus on strengthening digital skills and online safety.³⁶ FCDO's digital literacy commitments apply across different sectors, including education, health, social protection, financial services, agriculture, trade, and humanitarian, with plans to support digital innovation and digital capacity building. For instance, as part of the DAP, the Skills for Inclusive Digital Participation (SIDP) project helps digitally excluded groups – including people with disabilities, youth and women from disadvantaged backgrounds – to develop the skills to participate in the digital economy and society. By February 2024, the SIDP had provided basic/intermediate digital skills to almost 17,500 people in three countries.

"Digital literacy" is a key focus of USAID's *Digital Strategy*, with the term being used over twenty times³⁷ One of its five key initiatives focuses on increasing digital literacy for all, noting that digital literacy includes skills in using hardware, software, digital media and information. The Strategy also highlights the importance of supporting human-rights organisations and independent media through digital-literacy programmes. These commitments apply to all USAID Operating Units.

AFD does not explicitly mention digital literacy, but supports "digital inclusion projects", providing training in basic digital skills, including smartphone use, text writing, online payment and personal cybersecurity practices.³⁸ AFD's Digital Transition Strategy commits to providing vulnerable populations with the tools and support they need to become computer-literate in an equitable way. For example, AFD funds a programme in Senegal that trains 13,000 people, including 9,000 women, to use their mobile phones to manage their finances, while also raising awareness among policymakers about the need to tailor mobile financial services to rural women and youth. Expertise France, AFD's technical cooperation agency, actively supports digital transition and digital skills development through digital education, digital training and e-health.³⁹ Similarly, BMZ's updated digital policy prioritises "promoting digital skills" to support young people's professional development, while GIZ's Sector Initiative Global Health Project focuses on improving digital competences and skills for patients and health workers.⁴⁰

The Gates Foundation's Gender Equality Division focuses on accelerating progress toward a gender-equal world.⁴¹ Its Digital Connectivity programme aims to close the gender gap in digital access, enabling women and girls to fully participate and thrive economically.⁴² The programme highlights the importance of digital literacy in giving women more control over their health, home, and livelihood, while addressing barriers including lack of access, low digital literacy, and online safety issues. It works closely with other teams across the foundation on digital interventions to help close the gender digital divide.

34 *Digital Development Strategy*, *supra* note 10.

35 Interview with Rachel Grant at FCDO (18 June 2024).

36 *Digital Development Strategy*, *supra* note 10, p. 13.

37 *Digital Strategy*, *supra* note 12.

38 *Digital Transition Strategy*, *supra* note 6, p. 15.

39 Expertise France, *Expertise France and Digital Technology*, p. 3 (May 2023).

40 GIZ, *Sector Initiative Global Health: Health data and digital health*, pp. 1-2 (July 2022).

41 Bill & Melinda Gates Foundation, *Gender Equality*, <https://www.gatesfoundation.org/our-work/programs/gender-equality> (accessed 9 July 2024).

42 Bill & Melinda Gates Foundation, *Digital Connectivity*, <https://www.gatesfoundation.org/our-work/programs/gender-equality/digital-connectivity> (accessed 9 July 2024).

The Global Fund's *Strategy* does not specifically address digital literacy, but the *Digital Framework* includes "capacity building". During the interview, the Country Technology Services (CTS) team manager conflated capacity building with digital literacy,⁴³ highlighting the Fund's support for training for health care staff on new technologies. The CTS team also provides technical support to country stakeholders. While the *Digital Framework* applies broadly to the Global Fund's entire mission, the *Modular Framework Handbook*, highlights digital literacy activities in relation to "Community Systems Strengthening" interventions⁴⁴ under RSSH programming.

PEPFAR's *Five-year Strategy* does not explicitly address digital literacy but makes a related commitment. Its third strategic pillar "Public Health Systems and Security" includes a focus on "Strengthening the Health Workforce"⁴⁵, including a commitment to help partner countries to provide the digital tools, training and processes required to support, compensate, retain, and manage community health workers.

Although many ODA donors demonstrate commitments to digital literacy, the lack of comprehensive approach highlights the need for clearer frameworks to strengthen digital literacy across global development priorities.

43 *Digital Framework*, *supra* note 15, pp. 7, 17, 20, 25; Interview with Rob Cryer at the Global Fund (29 May 2024).

44 The Global Fund, *Modular Framework Handbook, Allocation Period 2023-2025*, p. 15 (May 2023).

45 PEPFAR's *Five-year Strategy*, *supra* note 16, p. 17.

Human Rights Oversight and Accountability

Human Rights Oversight and Accountability

This section focuses on human rights-based oversight or accountability mechanisms for digital health investments. The research considered *ex-ante* mechanisms that assess the risks or likely impacts of donors' investments on human rights and *ex-post* mechanisms that monitor and evaluate the actual impacts and hold institutional actors accountable. A distinction was made between mechanisms explicitly focusing on digital rights, and broader human rights mechanisms. Digital rights mechanisms are defined as those that assess the impact of digital technologies on specific human rights, including the rights to health, science, non-discrimination, privacy, and freedom of expression.

Digital Rights Mechanisms

Among the seven ODA donors, only GIZ has an oversight mechanism that explicitly addresses digital rights. In 2022, GIZ and the Danish Institute for Human Rights launched the Digital Rights Check,⁴⁶ a human rights assessment tool for staff and partners working on digital projects in the areas of technical development cooperation and development finance.⁴⁷ It ensures digital projects respect human rights and promote human rights-based approaches to digital interventions. The tool is not mandatory for all GIZ digital projects, but can be used by staff to assess human rights risks related to digital projects and digital solutions, or used within projects.⁴⁸

The Digital Rights Check link seems to have only recently been included on the “[Human Rights](#)” page of BMZ’s “[Digital Global](#)” website. The tool was found after the interview with GIZ, and GIZ staff did not mention it when asked about human rights oversight or accountability mechanisms for digital health projects.⁴⁹ Indeed, one GIZ representative stated that there were “no specific oversight or accountability mechanisms for digital health investments,” suggesting that the Digital Rights Check is not yet fully integrated into GIZ’s programmes or widely known among staff. The tool’s use does not appear to be mandatory, and it is unclear if and how the results and recommendations are applied. Nevertheless, the Digital Rights Check stands out as the only digital rights oversight mechanism among the ODA donors. The assessment tool is credited for referencing specific human rights and providing real-life examples of how development projects may violate human rights. It was also the collaborative effort of a major ODA donor and a national human rights institution, the Danish Institute for Human Rights.⁵⁰

46 See The Danish Institute for Human Rights, *Unveiling the digital rights check: Safeguarding human rights in digital transformation*, <https://www.humanrights.dk/result/unveiling-digital-rights-check-safeguarding-human-rights-digital-transformation> (accessed 10 July 2024); The Danish Institute for Human Rights, *The digital rights check* (10 Aug. 2022), <https://www.humanrights.dk/tools/digital-rights-check>.

47 Digital Rights Check, *Introducing the Digital Rights Check*, <https://digitalrights-check.bmz-digital.global/> (accessed 10 July 2024).

48 Digital Rights Check, *Digital Rights Check for GIZ*, <https://digitalrights-check.bmz-digital.global/giz/> (accessed 10 July 2024).

49 Interview with Karolin Herzog and Ute Jugert at GIZ (29 May 2024).

50 See The Danish Institute for Human Rights, <https://www.humanrights.dk/> (accessed 24 July 2024).

Human Rights Mechanisms

Four ODA donors — AFD, FCDO, GIZ/BMZ, and the Global Fund — have broad human rights oversight or accountability mechanisms, but most include human rights as a secondary concern or among other social or environmental issues. For example, one oversight mechanism subsumes human rights as a component of ethical principles, described as “ethical standards taking account of human rights principles.”⁵¹ One donor referred to “human rights due diligence” procedures, but no human rights mechanism was identified.⁵² Instead, the procedures appear to be part of an environmental and social management framework, where human rights play a minor role. None of the mechanisms require analysis of specific human rights, such as the right to health, and only one mechanism references human rights law.

Implementation of these human rights mechanisms is unclear. For example, three donors with broad-based human rights oversight and accountability mechanisms operate complaints systems that cover human rights violations, but their accessibility and effectiveness for communities remains unclear. One donor even commissioned a study to understand the low uptake of its complaints mechanisms. Overall, donors' inclusion of human rights in oversight and accountability processes appears to be aspirational at best and “box ticking” at worst.

The Gates Foundation, PEPFAR, and USAID lack digital rights or broader human rights oversight or accountability mechanisms for their digital health interventions. This contrasts with PEPFAR and USAID's explicit human rights commitments, including PEPFAR's support for community-led monitoring to promote accountability⁵³ and USAID's *Human Rights Landscape Analysis Tool* “to provide guidance for designing country strategy and projects.”⁵⁴ However, a review of their strategies and operational documents, together with interviews with donor representatives, revealed no evidence of specific mechanisms for digital rights or broad human rights oversight.

GIZ has at least three other human rights-based oversight and accountability mechanisms, in addition to the Digital Rights Check discussed above. Their Safeguards + Gender Management System is a mandatory tool to ensure that all GIZ projects are assessed during the planning phase for “unintended negative effects” impacting “human rights, conflict and context sensitivity, gender equality, environment, climate change mitigation and climate change adaptation.”⁵⁵ GIZ established the system in 2016 and used it to conduct almost 300 project reviews during 2018. If the assessment identifies risks, GIZ integrates appropriate measures to mitigate or prevent them.⁵⁶ GIZ also evaluates a random sample of projects using external evaluators, guided by GIZ's independent Corporate Unit Evaluation and in line with quality standards that include ethical standards encompassing human rights principles.⁵⁷ While the guidelines reference dignity, non-discrimination and equal opportunities, they lack a detailed framework to evaluate specific human rights. Additionally, GIZ's Compliance and Integrity Unit manages a grievance mechanism and whistleblower portal for anonymous reports of human

51 GIZ Corporate Unit Evaluation, *GIZ's evaluation system: Central project evaluations in BMZ business*, pp. 5-6 (2022).

52 AFD Group, *2023 Universal Registration Document*, p. 53 (2024).

53 Interview with two subject matter specialists at PEPFAR (25 June 2024).

54 USAID, *Human Rights Landscape Analysis Tool: Guidance on Identifying Key Issues and Entry Points for Human Rights Programming* (June 2016), available at https://pdf.usaid.gov/pdf_docs/PBAAE633.pdf.

55 GIZ, *Human rights – a guideline for project work*, <https://reporting.giz.de/2018/corporate-sustainability/focus-theme-human-rights/human-rights-a-guideline-for-project-work/index.html> (accessed 10 July 2024).

56 *Human Rights Strategy Policy Statement*, *ibid.*

57 *GIZ's evaluation system*, *supra* note 95, p. 6.

rights violations.⁵⁸ However, although GIZ's *Human Rights Policy* affirms its commitment to respond immediately to any human rights concerns,⁵⁹ the scope of human rights covered by the grievance mechanisms is not clearly defined in GIZ's documents.

AFD's *Universal Registration Document* (2023) promotes human rights due diligence and a human rights-based approach.⁶⁰ The Document explains that AFD implements procedures to identify, prevent or mitigate human rights violations throughout all stages of the project, integrating international standards. It emphasises protecting community rights, in particular their health and safety and requires legally binding financing agreements with recipients to include human rights commitments.⁶¹ However, there is no evidence of any independent human rights due diligence mechanism. Instead, the Document refers to AFD's *Environmental and Social Risk Management Policy and Assessment and the Sustainable Development Analysis and Opinion Mechanism*, in which human rights are secondary concerns.⁶¹

AFD's Environmental and Social Complaints Mechanism allows anyone harmed by environmental or social incidents from an AFD-funded project to file a complaint.⁶² It is unclear whether this mechanism covers human rights violations⁶³ as AFD does not specify which rights it covers, and this information is not included in relevant documents and online sources. Notably, the term "human rights" does not appear in the *AFD Environmental and Social Complaints Mechanism Rules of Procedure*.⁶⁴

FCDO's *Programme Operating Framework* sets mandatory rules for programme and project delivery.⁶⁵ The Framework's Rule 1 requires compliance with UK laws, including the Data Protection Act (2018), the Human Rights Act (1998) and the Equality Act (2010), in addition to international laws on human rights and humanitarian law. The Framework is applied during the initial review and approval process for new projects⁶⁶. A FCDO representative described the focus on human rights law as primarily about reducing project delivery risks and implementation of the *Programme Operating Framework* does not seem to involve a detailed human rights analysis of proposed projects. However, the FCDO representative noted that staff may involve technical experts to review specific aspects of project proposals - for example, a social development advisor or a health advisor or a health advisor may be asked to review a health-focused proposal for a project impacting women and girls to ensure it aligns with UK gender law. Unlike other ODA donors, FCDO does not appear to have a grievance mechanism or Office of the Inspector General to address complaints about human rights violations relating to its overseas projects.⁶⁷

58 GIZ, *Confidential reporting of information*, <https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=26zig7&c=-1&language=eng> (accessed 10 July 2024); see also GIZ, *Whistleblowing*, <https://www.giz.de/en/aboutgiz/39089.html> (accessed 10 July 2024); GIZ, *Compliance and Integrity Case Management Process: GIZ's Compliance and Integrity Unit*, available at https://www.giz.de/en/downloads_els/fallbearbeitungsprozess-aussendarstellung-en.pdf.

59 GIZ, *GIZ Human Rights Policy*, p. 2 (Mar. 2021).

60 *Universal Registration Document*, *supra* note 96, p. 53.

61 AFD, *Environmental and Social Risk Management Policy for AFD-funded Operations* (2017); AFD, *Sustainable Development Analysis and Opinion Mechanism*, <https://www.afd.fr/en/sustainable-development-analysis-opinion-mechanism> (accessed 11 July 2024).

62 AFD, *E & S Complaints Mechanism*, <https://www.afd.fr/en/e-s-complaints-mechanism> (accessed 10 July 2024).

63 Some sources suggest that the Environmental and Social Complaints mechanism covers human rights violations. See, e.g., Ministry of Foreign Affairs and International Development, *National Action Plan for the Implementation of the United Nations Guiding Principles on Business and Human Rights*, p. 29 (2017) ("AFD ... grievance management mechanisms ... will enable third parties affected by AFD ... projects to lodge complaints for environmental and/or social reasons (pollution, destruction of natural resources, human rights ... etc.); AFD, *Environmental and Social Risk Management Policy for AFD-funded Operations*, p. 1 (Oct. 2017) ("AFD has developed operating procedures to identify, prevent or mitigate environmental and social risks and impacts, as well as any human rights violations that could result from AFD-funded activities").

64 AFD, *AFD Environmental and Social Complaints Mechanism Rules of Procedure* (June 2022).

65 See GOV.UK, *Guidance: FCDO Programme Operating Framework* (19 Dec. 2023), <https://www.gov.uk/government/publications/fcd-programme-operating-framework>.

66 Interview with Rachel Grant at FCDO (18 June 2024).

67 FCDO does have a "complaints procedure," but it appears focused on consular services, "general policy or departmental complaints," and "fraud, sexual exploitation and abuse or other corrupt practices," with no mention of human rights. See GOV.UK, *Complaints procedure*, <https://www.gov.uk/government/organisations/foreign-commonwealth-development-office/about/complaints-procedure> (accessed 11 July 2024); see also FCDO *Programme Operating Framework*, *supra* note 116, p. 47.

The Global Fund has several mechanisms to address human rights in its investments. The Office of the Inspector General (OIG) handles reports of human rights violations by grant recipients⁶⁸ and its remit covers all systems, processes and activities of the Global Fund and its programmes.⁶⁹ The Global Fund's *Whistle-blowing Policy and Procedures* ensures whistleblowers remain confidential or anonymous.⁷⁰ The Fund requires programmes to meet five minimum human rights standards, and to alert them to any risks relating to the violation of the standards.⁷¹ The standards include ensuring non-discriminatory access to services, using scientifically approved medical practices, and protecting informed consent, confidentiality and the right to privacy.⁷² Although the OIG investigates complaints relating to violations of these standards, there are limited audits or investigations on record. For example, a search for the word "right" in the OIG's online database of Audits & Investigations delivers only one result of 351 entries — an advisory report on removing human rights-related barriers.⁷³ A 2018 assessment highlighted low uptake of the human rights complaints mechanism for a number of reasons, including a perceived lack of human rights knowledge within the OIG.⁷⁴

The Global Fund has a robust risk management framework overseen by the Programmatic Monitoring & Risk (PMRD) Division, coordinated by the Risk Management department with Country Teams and other stakeholders.⁷⁵ It monitors strategic, internal, and external risks, including grant-related risks, which its Risk Management Policy identifies as a major source of operational risk.⁷⁶ The Country Risk Management Framework includes 13 pre-defined risks (with over 30 sub-risks),⁷⁷ including Human Rights & Gender Equality; the Community, Rights and Gender (CRG) Department conducts a second review of any related risks following the Grant Management Division's (GMD) initial review. This category highlights barriers like stigma and discrimination⁷⁸, harmful laws or policies that limit access to health services, and insufficient involvement of affected communities in the design, implementation and monitoring of the response. Mitigation activities include human rights technical briefs, enhanced reporting requirements for human rights programming, expanding the Breaking Down Barriers initiative, reorganizing the CRG Department, and ensuring effective CRG support across the Secretariat. However, a 2024 audit conducted by OIG identified weaknesses in risk management processes,⁷⁹ including inconsistent risk assessment practices and unclear expectations, reducing the effectiveness of grant risk prioritization at portfolio level."

68 The Global Fund, *Report Fraud & Abuse*, <https://www.theglobalfund.org/en/oig/report-fraud-and-abuse/> (accessed 11 July 2024); The Global Fund, *The Global Fund*

Human Rights Complaints Procedure: Responding to Community Concerns, available at https://www.theglobalfund.org/media/1216/humanrights_2015-complaintsprocedure_brochure_en.pdf; see also The Global Fund, *Office of the Inspector General*, <https://www.theglobalfund.org/en/oig/> (accessed 11 July 2024).

69 *Office of the Inspector General*, *ibid.*

70 The Global Fund Office of the Inspector General, *Whistle-blowing Policy and Procedures for the Global Fund to Fight AIDS, Tuberculosis and Malaria*, p. 2 (Apr. 2019).

71 The Global Fund, *Human Rights* (8 Dec. 2023), <https://www.theglobalfund.org/en/human-rights/>.

72 *Human Rights Complaints Procedure*, *supra* note 123.

73 The Global Fund, *Audits & Investigations*, <https://www.theglobalfund.org/en/oig/reports/> (accessed 11 July 2024) (we entered "right" in the search field).

74 The Global Fund, *Global Fund Human Rights Complaints Mechanism: An Independent Assessment of Why Uptake Has Been Limited*, p. 7 (Mar. 2018).

75 See The Global Fund, *The Global Fund Risk Management Policy* (Nov. 2014); The Global Fund, *Operational Policy Note: Country Risk Management* (Nov. 2023); The Global Fund, *Global Fund Approach to Risk Management: LFA Training 2019/2020*, available at https://www.theglobalfund.org/media/9348/lfa_trainingcf-day1-3gfriskmanagement_materials_en.pdf.

76 *Risk Management Policy*, *ibid.* p. 2.

77 *Operational Policy Note: Country Risk Management*, *supra* note 130, p. 17.






78 The Global Fund, *Semi-Annual Risk Management Report: 50th Board Meeting*, p. 18 (Nov. 2023).

79 The Global Fund Office of the Inspector General, *Audit Report: Audit of the Global Fund Approach to Grant Monitoring*, p. 17 (May 2024).

Conclusions and Recommendations

Conclusions and Recommendations

Through their policies and investments, ODA donors play a leading role in shaping the future for digital health and rights. This research demonstrates that while digital health is not yet a key priority in their portfolios, there are many opportunities for ODA donors to demonstrate leadership and adopt a rights-based approach to digital health transformation. To address the digital divide, empower communities, and protect human rights in the digital space, ODA donors must co-increase their investments and strengthen their commitments to digital literacy and empowerment, especially for young people and vulnerable populations. Fully integrating these concepts into their policies and programming is essential. At the same time, donors need to apply their institutional human rights commitments to digital health interventions and anticipate and address the unique human rights risks that apply to digital transformation. Doing so will ensure that ODA donors establish strong foundations for a more inclusive, equitable and rights-based digital future.

Cross cutting recommendations for ODA Donors	
	Develop, strengthen and implement digital health policies to address the opportunities and human rights risks associated with digital health interventions, through meaningful, long-term partnership with civil society and community groups in relevant countries.
	Track digital health investments and disaggregate data according to specific categories, including digital empowerment and digital literacy. Ensure that data is publicly available and accessible online, building on existing donor tracking mechanisms where appropriate.
	Strengthen strategic commitments to digital empowerment and digital literacy and support implementation through dedicated funding and detailed programmatic and technical guidance to develop individuals' digital skills and understanding of their rights.
	Establish and strengthen human rights accountability mechanisms to monitor the impact of digital technologies on specific human rights, including the rights to health, science, non-discrimination, privacy, and freedom of expression.
	Improve donor collaboration on digital health investments to strengthen coordination and share good practice.

Recommendations for specific ODA Donors	
AFD	Expand the Environmental and Social Complaints Mechanism to explicitly address human rights in the context of digital health interventions, including the rights to health, science, non-discrimination, privacy, and freedom of expression.
FCDO	Establish a Digital Advisory Cadre that includes at least one expert in digital rights to support program development and design, in alignment with the <i>Programme Operating Framework's</i> compliance rules.
Gates Foundation	Develop and share human rights oversight and accountability mechanisms for all stages of project design, development, and implementation. These mechanisms should address specific human rights in the context of digital health, including the rights to health, science, non-discrimination, privacy, and freedom of expression.
GIZ / BMZ	Increase transparency of digital rights guidance and assessments for programme design and implementation. This includes making GIZ's Responsible Data Guidelines and Data Protection in Project Implementation - referenced in the Digital Rights Check- publically available.
Global Fund	<ul style="list-style-type: none"> » Conduct a review of digital technology initiatives across the portfolio and update the Digital Framework, engaging with the priorities and research of communities and civil society throughout the process. » Commit to the full scope of digital empowerment and make specific commitments to all aspects of digital literacy, including safety and responsibility and new content creation. » Strengthen country guidance to identify, manage and respond to digital rights issues, ensuring meaningful input from civil society.
Recommendations for US-based Donors ⁸⁰	
PEPFAR	Disaggregate the data in the Digital Health Inventory to reflect pre-defined categories and commitments, including human rights, digital empowerment, and digital literacy.
USAID	Expand existing digital health commitments and programming to empower health workers and communities. Adopt a broader view of digital empowerment to promote participatory data governance, critical perspectives on digital tools, and knowledge about digital rights.

Appendices

Appendix 1: ODA Documents Reviewed

France's Agence Française de Développement (AFD)

- Universal Registration Document (2022)
- Universal Registration Document (2023)
- Towards a World in Common: AFD Group Strategy, 2018-2022
- Digital Transition Strategy 2021-2025 (2021)
- Expertise France and Digital Technology (2023)
- Expertise France, Results & Outlook, 2022-2023
- AFD Environmental and Social Complaints Mechanism Rules of Procedure (2022)
- Report on Digital Freedoms in French-Speaking African Countries (2023)
- France Global Health Strategy (Abstract), 2023-27 (2023)
- Health and Social Protection Activity Report (2022)
- Health and Social Protection: Our Contribution to the SDGs (2022)
- AFD's Evaluation Policy (2013)
- The Human Rights-Based Approach: A Lever for Transformation (2024)
- Human Rights and Development: A Human Rights-Based Approach to Development Cooperation (2019)
- Environmental and Social (E&S) Complaints Mechanism: Activity Report (2022)
- National Action Plan for the Implementation of the UN Guiding Principles on Business and Human Rights (2017)
- Environmental and Social Risk Management Policy for AFD-Funded Operations (2017)
- Sustainable Development Analysis at the Service of the SDGs (2023)
- Sustainable Development Analysis Grid (2023)

Germany's Gesellschaft für Internationale Zusammenarbeit (GIZ)

- GIZ, Annual Statement of Accounts 2022
- GIZ, Integrated Company Report (2022)
- GIZ, Integrated Company Report (2021)
- GIZ, Sector Initiative Global Health Fact Sheet: Health Data and Digital Health (2022)
- GIZ, Catalyst Dialogue on Digital Health Data Governance: A New Framework on Health Data Governance? (2023)
- GIZ, Annual GIZ Compliance Report (2022)
- GIZ, Evaluation Report: Digitalization for Development (2022)
- GIZ, Central Project Evaluations in BMZ Business (2023)
- GIZ Human Rights Policy (2021)
- GIZ Human Rights Strategy Policy Statement (2023)
- GIZ's Evaluation System: Basic Aspects (2023)
- BMZ, Health, Social Protection and Population Dynamics Strategy (2023)
- BMZ, Digital Technologies for Development (2019)
- BMZ, Strategic Realignment of the BMZ's Digital Policy (2022)
- BMZ, Global Health: An Investment in the Future (2019)
- BMZ, Evaluating German Development Cooperation: BMZ Evaluation Policy (2023)

- BMZ, Human Rights in German Development Policy Strategy (2011)
- BMZ, Comments from the Federal Ministry of Economic Cooperation and Development on the DEval Evaluation Report: "Human Rights in German Development Policy, Part 1: The Human Rights Strategy and Its Implementation" (2021)
- BMZ, Comments from the Federal Ministry of Economic Cooperation and Development on the DEval Evaluation Report: "Human Rights in German Development Policy" (2023)
- DEval, Human Rights in German Development Policy: Part 1: The Human Rights Strategy and Its Implementation (2021)
- Global Health Strategy of the German Federal Government, 2020-2030 (2020)
- Strategy for International Digital Policy of the Federal Government (2023)

The United Kingdom's Foreign, Commonwealth & Development Office (FCDO)

- FCDO Digital Development Strategy, 2024-2030
- FCDO Programme Operating Framework (2023)
- FCDO Evaluation Strategy (2022)
- FCDO Evaluation Policy (2023)
- FCDO Due Diligence Guidance for External Partners (2021)
- FCDO & DSIT, The UK International Technology Strategy (2023)
- National Audit Office, Foreign, Commonwealth & Development Office Departmental Overview 2021-22 (2023)
- UK Government's Strategy for International Development (2022)
- UK Global Health Framework: Working Together Towards a Healthier World (2023)
- UK Government, The Orange Book: Management of Risk – Principles and Concepts (2023)

The United States Agency for International Development (USAID)

- Policy Framework (2023)
- Digital Strategy, 2020-24
- A Vision for Action in Digital Health, 2020-24
- USAID Vision for Health System Strengthening, 2030
- Digital Ecosystem Country Assessments Factsheet and Toolkit (2022)
- Human Rights Landscape Analysis Tool (2016)
- Considerations for Using Data Responsibly at USAID (2019)
- ADS Audits:
 - ADS Chapter 592 - Performance Audits (2010)
 - ADS Chapter 590 - USAID as the Audited Entity (2022)
- ADS Chapter 579 - USAID Development Data (2024)
- Oversight Plan - USAID Office of Inspector General Fiscal Year 2023

The United States President's Emergency Plan for AIDS Relief (PEPFAR)

- PEPFAR Overall Fact Sheet (2021)
- Core Program and Policy Priorities (2021)
- PEPFAR's Five-Year Strategy: Fulfilling America's Promise to End the HIV/AIDS Pandemic by 2030 (2022)

- Monitoring, Evaluation, and Reporting Indicator Reference Guide (2022)
- FY 2024 Technical Considerations
- PEPFAR 2023 Country and Regional Operational Plan (COP/ROP) Guidance for all PEPFAR-Supported Countries
- 2022 Annual Treatment Report to Congress
- PEPFAR Digital Health Inventory
 - FY24 Digital Health Inventory (DHI) Offline Form
 - FY23 Digital Health Inventory (DHI) Standard Operating Procedures (SOP)
- FY23 Digital Health Inventory (DHI) Orientation
- Inspectors General Coordinated PEPFAR Oversight Plan, FY 2024
- OIG, PEPFAR in Africa - USAID Can Take Additional Steps to Improve Controls Over Data Quality (2022)

The Global Fund to Fight AIDS, Tuberculosis and Malaria (Global Fund)

- Global Fund Strategy, 2023-2028: Fighting Pandemics and Building a Healthier and More Equitable World
 - Global Fund, Strategy Framework, 2023-2028
- Advocacy Roadmap, 2023-2025 (2023)
- Global Fund Audit of In-Country Data and Data Systems (2023)
- The Global Fund Strategic Framework for Data Use for Action and Improvement at Country Level, 2017-22
- Key Performance Indicators (KPIs) Handbook for the 2023-2028 Strategy (2023)
- Information Note: Resilient and Sustainable Systems for Health (RSSH), Allocation Period 2023-2025
- Modular Framework Handbook, Allocation Period 2023-2025
- Whistle-Blowing Policy and Procedures (2019)
- Semi-Annual Risk Management Report: 50th Board Meeting (2023)
- Guidance Note - HIV Surveillance Options for KVPs (2023)
- Measurement Guidance for Global Fund Supported HIV Prevention Programmes (2024)
- "Technical Briefs" on human rights for HIV, TB, and Malaria
 - Technical Brief: Removing Human Rights-related Barriers to TB Services (2023)
 - Technical Brief: Removing Human Rights-related Barriers to HIV Services (2022)
 - Technical Brief: HIV Programming at Scale for and with Key Populations (2022)
- Technical Brief: Equity, Human Rights, Gender Equality and Malaria (2022)
- Digital Framework Design: Concept Note and Draft Framework Pre-Read (2022)
- Organizational Risk Register (ORR) for Q1-2023: Strategy Committee

The Bill & Melinda Gates Foundation (Gates Foundation)

No strategy, policy, or other documents are available on the Gates Foundation website (<https://www.gatesfoundation.org/>). The website's content appears to be the only source of information about the donor's policies and programming.

Appendix 2: List of Interviewees

Germany's Gesellschaft für Internationale Zusammenarbeit (GIZ)

- Karolin Herzog, *Sectoral Department on Health and Social Protection*
- Ute Jugert, *Public Health Advisor, Health Systems Strengthening*

The United Kingdom's Foreign, Commonwealth & Development Office (FCDO)

- Rachel Grant, *Social Development Advisor*

The United States Agency for International Development (USAID)

- Merrick Schaeffer, *Director, Global Health Center for Innovation and Impact (CII)*

The United States President's Emergency Plan for AIDS Relief (PEPFAR)

- Two PEPFAR subject matter specialists (requested anonymity)

The Global Fund to Fight AIDS, Tuberculosis and Malaria (Global Fund)

- Rob Cryer, *Country Technology Services Manager*

Appendix 3: Example In-Depth Interview Questionnaire

FCDO

Rachel Grant, *Social Development Advisor*

Questions

18 June 2024

Personal and Organizational Information

1. Please tell us your full title and describe the department you work in and your role there.

Digital Health Investments and Strategy

2. The [Digital Investment Principles](#) call on donors to “[t]rack investments, progress, learnings and successes in digital health systems in a transparent manner.” The WHO’s [Digital Health Atlas](#) provides an open-source platform to track digital health investments globally. We are aware of the UK’s innovative [DevTracker](#) tool that provides detailed information on the UK’s international development programs. Can you tell us more about the DevTracker tool and any other tools FCDO uses to track its digital health investments specifically? Does FCDO use the DevTracker tool or any other tools to gather information about digital empowerment, digital literacy, or human rights as well?
3. What’s the total amount of FCDO’s financial investments in digital health in USD?
4. We were excited to see FCDO’s new *Digital Development Strategy* (“DDS”) for 2024-2030, especially its commitment to “digital inclusion.” Does FCDO have a dedicated digital health strategy or guidance framework currently or forthcoming?
 - a) If so, what are the key objectives, principles, or methods, and how is the strategy situated within FCDO’s other strategies?
 - b) If not, how does FCDO integrate digital health commitments and priorities into its overall institutional strategy or framework?

Digital Literacy and Empowerment

5. We see that one of the interconnected objectives of FCDO's new DDS is "digital inclusion." The DDS' breakdown of "digital inclusion" into key components, including digital literacy and skills, is particularly compelling. The DDS' view on digital empowerment is less clear, although its references to "meaningful access," "digital hygiene skills," and "local content self-creation capacity" seem to fit within our definition of digital empowerment. Can you tell us more about these components of "digital inclusion" under the DDS? Does FCDO consider digital empowerment or human rights as part of digital inclusion?
 - a) Can you tell us more about FCDO's commitment to digital inclusion in its digital health investments specifically?
6. Can you tell us about a FCDO-supported intervention that promoted digital literacy and empowerment?
 - a) What impacts did the intervention achieve?
 - b) What kinds of challenges did it encounter?

Oversight and Accountability for Digital Health

7. We are particularly interested in how the FCDO's Programme Operating Framework—as well as the other oversight and accountability policies—is implemented in digital health interventions specifically. We are particularly interested in Rule 1 on human rights and Rule 13 on digital investments.
 - a) The first rule in FCDO's Programme Operating Framework's Ruleset requires programs and projects to comply with human rights, including the International Development Act, the Human Rights Act, the Data Protection Act and Regulations, and more. Can you tell us more about the mechanics of how Rule 1 is implemented for digital health interventions? Is there more detailed guidance around human rights compliance tailored to digital health interventions? What does it look like to implement Rule 1 in a digital health intervention? For instance, is there any guidance provided for digital health rights? If a beneficiary's human rights are violated during a digital health intervention, is there a reporting mechanism akin to that provided in Rule 19?
 - b) Can you tell us more about what it looks like to implement Rule 13 for a digital health intervention? What does a review by the Portfolio Assurance Control Team look like in the context of a digital health intervention? For example, does the Team provide expert advice tailored to digital health?
8. As part of our research, we're developing case studies highlighting best practices and challenges for rights-based accountability mechanisms in the digital space. Can you share an example of a FCDO digital health intervention that involved oversight or accountability actions, noting what worked and what challenges you faced?

Final Thoughts

9. Is there anything else you'd like us to know about FCDO's digital health investments we didn't discuss today?

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