Terms of Reference

Consultant to conduct a national and regional legislative landscape review of health data and AI governance in the Western Pacific Region

Details of work required: The consultant/organisation will carry out national legislative landscape reviews of health data and AI governance in eight countries in the Western Pacific Region, update six existing Transform Health country reviews from the region, and conduct a regional analysis across all 14 countries, presenting trends, strengths, gaps, needs and priorities across the region. The findings will be presented in a regional report, co-published by Transform Health and the WHO Regional Office for the Western Pacific (WPRO).

Expected duration: the work should be carried out between November 2026 and January 2027.

Background

Stronger, more effective and equitable governance of health data and AI is needed to fully harness their potential for public benefit and improved health outcomes, while curbing the risks and harms of inadequate guardrails. Countries across the Western Pacific Region are rapidly digitalising their health systems and adopting AI, but legislative and regulatory frameworks have not kept pace. Approaches vary widely, from comprehensive data protection laws with health-specific provisions to no data protection law at all, limiting safe data sharing, interoperability and the responsible use of AI within and across borders.

Transform Health is working with WHO WPRO to carry out national legislative and regulatory landscape reviews across the region, to identify current approaches, gaps and priorities, to provide an evidence base for regional priorities and action.

Transform Health has already developed national health data governance landscape reviews for six countries in the region (Australia, China, Indonesia, Malaysia, the Philippines and Singapore), using the Health Data Governance Principles, legislative blueprint, and legislative assessment tool. Transform Health is seeking to recruit a consultant/organisation to extend these reviews to eight additional countries, update the existing reviews to include AI governance (as relevant), and carry out a regional (cross-country) analysis.

Scope of work

The consultant/organisation will carry out national landscape reviews, a regional analysis and develop a regional report. This assignment will include the following key activities:

- **National landscape reviews:**

- Conduct national landscape reviews for eight countries, reflecting a mix of geographies and income levels: high-income economies, emerging economies (including the Mekong), and Pacific Island countries. The final list will be confirmed with Transform Health and WHO WPRO.
- Identify and analyse relevant laws, regulations, policies and strategies (e.g. data protection law, health-specific data protection law or provisions, digital health law or policy, AI law or policy, cybersecurity law), including against the Health Data Governance Principles, Legislative Blueprint, and other relevant regional and international principles and instruments, following a similar methodology and structure of existing Transform Health landscape reports.
- Update the six existing Transform Health reviews (Australia, China, Indonesia, Malaysia, the Philippines and Singapore), if required, to reflect new or amended laws and policies, including around AI governance.

- **Regional analysis:**
  - Conduct a cross-country analysis of trends, strengths, gaps, needs and priorities across national approaches in the 14 countries, comparing by income level, sub-region and digital maturity, and highlighting good practice.
  - Develop a matrix of the types of legislation and regulation in each country (e.g. data protection law, health-specific data protection law or provisions, digital health law or policy, AI law or policy).
  - Identify and review existing regional strategies, frameworks, principles and tools relevant to health data and AI governance (e.g. WHO WPRO, ASEAN, APEC, Pacific Islands Forum, Pacific Community).
  - Develop recommendations, including opportunities to address gaps through a regional health data and AI governance framework.

- **Regional report:**
  - Draft the regional report, including the cross-country analysis, legislation and regulation matrix, review of regional instruments, recommendations, and country snapshots for all 14 countries in an annex. National reports will be published as separate products.
  - Circulate drafts for Transform Health and WHO WPRO feedback, and incorporate feedback to finalise the report and national reports. Design and layout will be handled separately by Transform Health.

Key deliverables and deadlines

Deadline	Deliverable
20 November 2026	• Inception note setting out the methodology (including AI governance criteria), confirmed country list, and outline of the regional report.

11 January 2027	• National landscape reports for the 8 new countries, following the structure of existing Transform Health reports. • Updated national reviews for the 6 existing countries, including AI governance (as relevant). • Country snapshots for the 8 new countries. • Legislation and regulation matrix for all 14 countries (also provided as an editable dataset). • Draft regional report, including cross-country analysis, review of regional instruments and recommendations.
29 January 2027	• Final regional report, national reports and snapshots, incorporating feedback from Transform Health and WHO WPRO.

Profile and experience

We are looking for a consultant/organisation with legal and policy expertise in health data governance, data protection, digital health and AI. We are particularly interested in experience of comparative legal and policy analysis across multiple countries, and of working in the Western Pacific Region. The consultant should have strong research and analytical skills, with the ability to synthesise findings and make clear recommendations.

- Advanced degree in law, public health, health policy, digital health, or related field.
- Proven track record (8+ years) in health data governance, data protection law, AI or digital health policy.
- Demonstrated experience of legislative and policy analysis across multiple countries.
- Strong understanding of national and regional health data and AI governance frameworks in the Western Pacific Region, including in Pacific Island countries.
- Excellent analytical and writing skills in English, with the ability to synthesise complex evidence and analysis.
- Ability to deliver to tight deadlines; teams with capacity to work across several countries in parallel are welcome.
- Preference will be given to consultants/organisations based in the region.

Remuneration

The proposed budget for this assignment is approximately **USD 24,000-26,000**; to be agreed based on experience and the proposal.

Application process

To apply, please submit the following to hr@transformhealthcoalition.org **by 23:00 CET on 15 November:**

- Your CV and cover letter outlining your experience relevant to this consultancy (CVs of all team members, if applying as a team or organisation).
- A brief proposal outlining your approach to this assignment.

- Your proposed daily rate and number of days to carry out this consultancy, including a breakdown by task/deliverable.
- An example of a previous comparative legal or policy analysis.

Transform Health is a global coalition of more than 230 organisations dedicated to achieving universal health coverage (UHC) by 2030 by harnessing digital technology and the use of data. We bring partners and networks together, leveraging our shared experience and expertise, to shape policy agendas, influence decision makers, develop tools, provide technical support to governments and others, and conduct research and analysis to deliver health for all in the digital age.