



EFN Policy Statement on the Data Union Strategy

Announced by Ursula Von Der Leyen in her State of the Union, [Political Guidelines for the European Commission 2024–2029](#), the Data Union Strategy will aim to make more data available for AI, to simplify the data regulatory framework, and to address challenges related to international data flows. The Strategy will be launched by the end of 2025.

While EFN welcomes this initiative, recognising the need for unlocking access to high-quality patients' data in order to develop AI tools that can support the quality and safety of nursing care (read the [EFN Statement \(2024\) on Improving frontline nurses' time for direct patient care with digitalisation & responsible AI](#)), several questions remain unanswered. First, it remains unclear how this new Strategy will interplay and complement the already extensive and complex data-related EU regulatory frameworks. Then, it remains to be seen whether this Strategy will prove to be an added value for frontline nurses, or whether it will end up being an added administrative burden.

Ensure that the development and deployment of sustainable AI, empower through the Data Union Strategy comes hand in hand with the establishment of clear ethical safeguards, tackling issues such as bias, transparency, data governance and call for rigorous ongoing evaluation to prevent harmful consequences.

Recognising the crucial role played by data for economic growth and research, in 2020 the European Commission launched the [European Data Strategy](#), as an attempt to create a single market for data. Under this strategy, several regulations were developed, such as the [European Data Act](#) (2024), among others. Furthermore, it also underpinned the creation of the Common European Data Spaces, including the [European Health Data Space](#) (read the [EFN Policy Statement \(2025\) on EHDS implementation](#)), which entered into force in March 2025. The new Data Union Strategy, in principle, aims to complement all these different regulations, as the European Commission is attempting to establish the EU global leadership in AI-development across all sectors, including healthcare.

In the healthcare sector, the patients' health data underpins all the efforts towards scientific and technological innovation, including in AI. Taking this into consideration, it becomes obvious that nurses, as frontline healthcare professionals, who are responsible for collecting the patients' health data via the Electronic Health Records (EHRs) (read the [EFN Policy Statement \(2025\) on](#)

[Nurse involvement in EHR development](#)), will therefore play a crucial role in this race towards EU AI global leadership in the healthcare sector. The European Commission must recognise this, and ensure that the nurses' needs and expectations are well integrated in the development and implementation of the Data Union Strategy.

Therefore, the EFN is calling on the EU Institutions and the EU and European Member States to:

1. As nurses will be at the frontline playing leading the collection of patients' health data for AI development and innovation, they need to be adequately educated and trained in the use of the Electronic Health Records (EHRs), and Medical Devices. Therefore, the EU and the Member States must invest in the education and training of nurses in line with the [Directive 2013/55/EU](#) and the [Updated Annex V](#), as well as in high-quality [Continuing Professional Development \(CPD\)](#), upskilling, and reskilling.
2. Ensure a transparent co-creation with the frontline nurses and their representatives, including the EFN and the National Nurses Associations (NNAs), through the development and implementation of the Data Union Strategy.
3. Ensure that the EHDS and the Data Union Strategy do not overlap, creating confusion, and that they complement each other. With a very long and complex implementation timeline until 2034, the EHDS represents already an important challenge for frontline nurses, who play a key role in collecting patients' health data for primary (care provision) and secondary (research and innovation) health data uses. It is therefore key that the Data Union Strategy does not become an added administrative burden for frontline nurses, but instead, support nurses in streamlining the frontline implementation of EHDS.
4. As nurses are expected to be active and central contributors to unlocking patients' health data for AI development in the context of the Data Union Strategy and EHDS, make available adequate EU and National funding to ensure that they can be adequately educated and trained. This should be done in the context of the [Recovery and Resilience Facility \(RRF\)](#), the [EU4Health programme](#), and in the context of the revision of the [EU Multiannual Financial Framework \(MMF\)](#), which is set to expire in 2027.
5. Ensure that the data unlocked with leadership of the frontline nurses for AI development goes to benefit frontline nurses in improving time for direct patients' care. This can only be achieved if AI-tools are co-developed and implement with the frontline nurses themselves.
6. Ensure that all development and deployment of AI is underpinned by clear ethical safeguards, free from bias, is transparent, and sustainable.

7. Establish stronger nurse-led usability testing of digital systems like EHRs, to ensure they genuinely reduce rather than add to administrative burden and refer to formal workforce. Furthermore, conduct regular impact assessments, to fully understand and mitigate the implications of digital transformation on nursing workload, staffing, and wellbeing.

Further readings:

- De Raeve, P. (2025) Navigating the EU nursing workforce crisis: Stop talking, start acting! Available at: <https://efn.eu/wp-content/uploads/2024/07/Navigating-the-EU-nursing-workforce-crisis-July-2024.pdf>
- EFN Policy Statement on Co-designing the EU Health and Care Workforce Strategy (2024). Available at: <https://efn.eu/wp-content/uploads/2024/10/EFN-Policy-Statement-on-EU-Workforce-Strategy-Oct.-2024.pdf>
- EFN Policy Statement on Building and Sustaining a Resilient Nursing Workforce in the EU and Europe (2022). Available at: <https://efn.eu/wp-content/uploads/2022/04/EFN-Policy-Statement-on-Building-and-Sustaining-a-Resilient-EU-Nursing-Workforce-in-the-EU-and-Europe-April-2022.pdf>
- Paul De Raeve*, Patricia M Davidson, Andreas Xyrichis and Pamela F Cipriano. The Ticking Time Bomb in the European Union Has Exploded: The Importance of European Council Recommendations on the Healthcare Workforce. Iris J of Nur & Car. 5(1): 2024. IJNC.MS.ID.000601. DOI: 10.33552/IJNC.2024.05.000601
- International Council of Nurses (2025). International Nurses Day 2025: Caring for nurses strengthens economies. Available at: https://www.icn.ch/sites/default/files/2025-04/ICN_IND2025_report_EN_A4_FINAL_0.pdf

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