Foresight Lab
Analysing the future impact of the Digital Omnibus on workers

Stress-testing data protection and AI-related safeguards under the Digital Omnibus

Date: Thursday March 5, 2026
Place: Brussels
Venue: DoubleTree by Hilton Brussels City, Place Rogier, 8th floor
Languages: EN and FR, simultaneous interpretation will be provided
Organiser: ETUI: Aida Ponce Del Castillo, senior researcher

Context:
In November 2025, the European Commission presented a Digital Omnibus as part of a broader digital package, aimed at simplifying and consolidating parts of the EU digital, data, cybersecurity and AI acquis. The workshop examines how the Digital Omnibus proposals may affect the application, interpretation and enforcement of EU data protection law and the AI Act in employment contexts.

Although presented as technical simplification, the proposals may have material implications for workplace data governance. In particular, they may alter how workers' personal data are collected, processed, shared and reused, and how AI systems are developed, trained and deployed in the workplace. The workshop includes case-based analysis and a comparison between the current legal baseline and the post-Omnibus regulatory scenario.

Objective: The objective of the workshop is to assess, in practical terms, how the Digital Omnibus proposals may affect the exercise and enforceability of data protection rights and AI-related safeguards applicable to workers, and to explore the implications for trade union strategies. It also aims to develop action-oriented ideas that can be used across trade unions.

Guiding questions:

- Which proposed amendments are most consequential for workers' data and workplace AI governance?
- What new grey zones or interpretative uncertainties may be created?
- What are the risks may arise for the exercise or enforcement of workers' rights and safeguards?
- What strategies can trade unions design and implement?

The ETUI is financially supported by the European Union.

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Programme

TIME	ITEM	Speaker
9:00-9:30	**Welcome coffee and icebreaking activity**	Aida Ponce Del Castillo, ETUI
9:30-10:00	Keynote **What is the Digital Omnibus? An overview of the proposals**	Johannes Anttila Policy Advisor at European Parliament Technology, labour, workers' rights
10:00-10:15	Q&A	
10:15-10:45	**BREAK**	
10:45-11:05	**Impacts of the Digital Omnibus on workers' rights**	Isabelle Schömann, Deputy General Secretary of the ETUC
11:05-11:25	Practical impacts on GDPR	Itxaso Domínguez de Olazábal EDRI
11:25-11:45	Practical impacts on the AI Act	Daniel Leufer, AccessNow
11:45-12:05	Practical impacts on the AI Act harmonised standards	Natalia Giorgi, ETUC
12:05-12:25	Discussion	
12:25-13:30	**LUNCH**	
	Stress-testing lab: what breaks, what weakens, what shifts for workers under the Digital Omnibus Baseline vs post-Omnibus comparaison Thomas Le Bonniec, Télécom Paris; Aida Ponce Del Castillo, ETUI Laura Lazaro Cabrera, CDT, Europe Danel Leufer, AccessNow	
13:30-13:50	**Case 1:** The notion of personal data and the processing of special categories of data.	
13:50-14:10	**Case 2**: AI high-risk classification, delayed applicability and the erosion of safeguards	
14:10-14:30	**Case 3**: The use of pseudonymous data to monitor or profile workers (wearables, badges, etc)	
14:30-15:00	**BREAK**	
15:00-15:20	**Case 4**: Contractual necessity as a basis to deploy automated decision-making.	
15:20-15:40	**Case 5:** The exercise and limitations of the right of access	
15:40-16:10	Outputs and actions	
16:10 -16:45	Closing and next steps	

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