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**QUALITY JOBS ACT: POSSIBLE EU ACTION TO IMPROVE
WORKING CONDITIONS, HEALTH AND SAFETY AT WORK
AND IMPLEMENTATION OF WORKERS' RIGHTS**

**CONTRIBUTION TO A SECOND-PHASE
SOCIAL PARTNER CONSULTATION**

The European Confederation of Independent Trade Unions (CESI) is a confederation of more than 40 national and European trade union organisations from across Europe, with a total of more than 6 million individual members. Founded in 1990, CESI is a recognised European sectoral social partner and advocates improved employment conditions for workers in Europe and a strong social dimension in the EU.

Preliminary remarks

CESI appreciates the initiative of the European Commission to realise a Quality Jobs Act. Europe's competitiveness, resilience and strategic autonomy ultimately depend on the quality of work performed across its economy. Quality jobs are not merely a social objective; they are a prerequisite for sustainable productivity growth, successful digital and green transitions, labour market participation, innovation and public trust in the European project. The EU therefore requires a coherent framework that enables economic modernisation while ensuring that workers benefit from technological progress and structural change.

CESI has already underlined in its first-phase contribution¹ that a new EU Quality Jobs Act should become a key implementation instrument of the European Pillar of Social Rights and translate the ambitions of the Quality Jobs Roadmap into concrete and enforceable rights for workers. CESI continues to support this objective and welcomes the European Commission's efforts to further specify the direction of possible legislative action through a second-phase consultation.

Concerning this second phase, CESI reiterates that a future Quality Jobs Act should not become a collection of isolated amendments or soft law to existing labour legislation. Instead, it should ensure a coherent framework for the EU acquis that guarantees comprehensive occupational safety and health (OSH), further improves working conditions, promotes fair labour market transitions, enhances worker participation and reinforces collective bargaining and social dialogue, and ensures effective enforcement of existing social and labour laws throughout the Single Market. The Quality Jobs Act should combine binding minimum standards with sufficient flexibility for national social partners to adapt implementation through collective bargaining where appropriate.

¹ https://cdn.prod.website-files.com/67911412a89ff81c0e28e4d4/697b7b6ec4e3db35a71c1178_2026%20-%20CESI%20first-phase%20SP%20consultation%20contribution%20-%20QJA%20-%20final%2020260128.pdf

The increasing use of artificial intelligence (AI) and algorithmic management (AM) at work, green and industrial transitions and restructurings, persistent labour shortages in both private and public services, labour force ageing, abuses in subcontracting chains, spreading psychosocial risks and a continued prevalence of violence at work all demonstrate that Europe requires a modern labour market framework capable of responding to structural challenges without weakening workers' rights. As CESI has consistently argued across its recent policy positions, competitiveness and social progress must reinforce one another rather than be treated as competing objectives.

Answer to question 1: What are your views on the objectives of possible EU action set out in sections 1 to 7 of the European Commission's consultation document C(2026) 5109 of July 20 2026?

CESI welcomes the European Commission's overall objective of establishing a comprehensive framework capable of improving the quality of employment across the EU. The consultation correctly recognises that quality jobs are multidimensional and require action across employment conditions, occupational safety and health, social dialogue, skills technological change and effective enforcement.

CESI particularly welcomes that the European Commission maintains a holistic understanding of quality jobs: Employment quality cannot be reduced to wages alone or to individual aspects of working conditions. Rather, it encompasses fair remuneration, secure employment relationships, healthy and safe workplaces, access to lifelong learning, equal opportunities, work-life balance, effective worker participation and strong collective bargaining structures. This understanding reflects both the European Pillar of Social Rights and the objectives previously identified in the Quality Jobs Roadmap.

CESI therefore supports the European Commission's intention to address, in particular, (1) algorithmic management and artificial intelligence at work, (2) occupational safety and health, (3) subcontracting and complex employment relationships, (4) management of labour market transitions, and (5) enforcement of labour standards and the role of social partners. These topic areas correctly identify important drivers affecting employment quality.

At the same time, the Quality Jobs Act should explicitly pursue upward social convergence throughout the EU Single Market. The objective should not merely be to reduce the most severe deficiencies but to encourage continuous improvements in employment quality across all Member States while safeguarding fair competition within the Single Market. CESI considers that the objectives under the Quality Jobs Act should be broadened in several respects to do justice to its aim to approach quality jobs in a holistic manner:

1. First, quality employment requires stronger action against precarious work beyond the areas explicitly covered by the consultation. CESI reiterates its calls for a review of the Fixed-Term Work Directive to end abusive chain contracts, for a fair remuneration of traineeships, and for stronger social conditionality in public procurement and State aid so that public money never supports business models based upon poor working conditions or violations of workers' rights. Any new EU Traineeships Directive and revised EU State aid and public procurement rules should be streamlined with the Quality Jobs Act.

2. Second, the European Commission should recognise more explicitly that digitalisation must deliver benefits for workers alongside productivity gains. Artificial intelligence can substantially improve working conditions when implemented responsibly, yet it also creates risks concerning surveillance, opaque decision-making, discrimination, work intensification and psychosocial health. The objectives should therefore expressly include human-centred AI governance, meaningful worker participation, transparency of algorithmic systems, impact assessments throughout the lifecycle of AI tools at work and effective human oversight of consequential employment decisions.
3. Third, employment quality in public services deserves significantly greater visibility. While many challenges described by the European Commission concern above all private-sector employment, Europe's public administrations, health care systems, education, emergency services, law enforcement and justice systems face equally severe recruitment and retention difficulties. Persistent understaffing, increasing violence against frontline workers and deteriorating working conditions threaten not only workers themselves but also the resilience and quality of public services upon which citizens and businesses depend. Public services should therefore constitute an explicit priority within the future Quality Jobs Act, even if it will be horizontal in nature.
4. Fourth, greater emphasis should be placed on strengthening inclusive social dialogue and trade union pluralism. Successful implementation of any future legislative framework depends upon meaningful involvement of representative trade unions throughout policy design, implementation and enforcement. The 2023 Council Recommendation on strengthening social dialogue should become an operational reference for implementation at the national level, accompanied by strengthened proportionate and non-discriminatory support for capacity-building and comprehensive access to social dialogue structures for all representative European trade union organisations at the EU level.

Answer to question 2: What are your views on the possible avenues for EU action set out in sections 1 to 7 of the European Commission's consultation document C(2026) 5109 of July 20 2026?

CESI considers that EU action is not only justified but necessary to address the challenges identified in the consultation document. The widespread deployment of artificial intelligence (AI), algorithmic management (AM), increasingly complex subcontracting chains, labour shortages, labour force ageing and the twin digital and green transitions all transcend national borders and directly affect the functioning of the Single Market.

As the consultation document correctly observes, fragmented national approaches risk creating diverging levels of worker protection, legal uncertainty for employers operating across borders and distortions of fair competition. A common European framework guaranteeing adequate standards while respecting subsidiarity and the autonomy of national industrial relations systems can therefore provide significant added value.

CESI agrees that future EU action should primarily build upon the existing acquis, strengthen its implementation and enforcement, clarify the interaction between existing legal instruments where necessary and introduce targeted complementary legislative measures (only) where genuine regulatory gaps remain. At the same time, the Quality Jobs Act should not become merely an exercise in legal clarification. It should provide workers and employers with a coherent framework capable of ensuring that Europe's transformation towards a more digital, sustainable and competitive economy also delivers measurable safeguards for employment quality.

In line with its first-phase contribution,² CESI considers that future EU action should be guided by three overarching principles:

1. EU action should promote upward social convergence, prevent social dumping and ensure fair competition throughout the Single Market.
2. Competitiveness and simplification objectives must reinforce rather than weaken workers' rights and employment standards.
3. Social dialogue and collective bargaining must remain central mechanisms for designing, implementing and enforcing quality employment policies.

Against this background, CESI proposes the following direction and scope for future EU action:

On artificial intelligence (AI) and algorithmic management (AM) at work

CESI shares the European Commission's assessment that algorithmic management and artificial intelligence create considerable opportunities for innovation and productivity while simultaneously generating new risks for workers regarding transparency, discrimination, surveillance, work intensification and managerial accountability. The European Commission correctly identifies that existing legislation - including the GDPR, the AI Act and the information and consultation directives - already provides important safeguards but may not always offer sufficiently clear or comprehensive protection in employment relationships in the AI and AM context.

Rules on AI and AM at work should operationalise workers' rights specifically within employment relationships while ensuring coherence with the GDPR, the AI Act and existing occupational safety and health legislation. Rules should be build around six complementary pillars.

1. First, workers and their representatives should always need to be informed and consulted before AI systems are introduced or substantially modified whenever these systems affect work organisation, recruitment, performance evaluation, remuneration, scheduling, occupational safety and health or employment status. Social dialogue should accompany the entire lifecycle of workplace AI, allowing collective agreements to tailor implementation to sectoral circumstances.

² https://cdn.prod.website-files.com/67911412a89ff81c0e28e4d4/697b7b6ec4e3db35a71c1178_2026%20-%20CESI%20first-phase%20SP%20consultation%20contribution%20-%20QJA%20-%20final%2020260128.pdf

2. Second, employers should conduct ex-ante impact assessments before deploying high-risk workplace AI systems and continuously review their impacts after deployment. These assessments should examine not only technical risks but also effects on occupational safety and health, work organisation, equality, privacy and psychosocial well-being. Appropriate mitigation measures should be developed together with worker representatives.
3. Third, workers should receive meaningful information regarding the purpose, functioning and principal parameters of algorithmic systems affecting them. Where automated decisions have significant consequences for employment conditions, workers should benefit from a right to understandable explanations and effective human review. Human judgement - not algorithmic outputs alone - must remain decisive for consequential employment decisions including recruitment, promotion, disciplinary measures and dismissal. Where employers use third-party software, the provider should supply clear, standardised information on the system's relevant functions and parameters so that employers can fulfil their duties to inform and consult workers. Contracting for external software should not relieve employers of responsibility for decisions affecting their workforce.
4. Fourth, stronger safeguards should govern the collection, processing and use of workers' personal data. AI deployment should respect the principles of proportionality, necessity, purpose limitation and data minimisation while preventing excessive workplace surveillance.
5. Fifth, employers should provide adequate AI literacy and continuous training for both workers and managers. Successful technological transformation depends not only upon the deployment of technology but equally upon workforce capabilities and confidence.

On occupational safety and health (OSH)

CESI strongly supports strengthening occupational safety and health within the Quality Jobs Act. While European workplaces have become considerably safer over previous decades, new risks increasingly emerge from digitalisation, climate change, violence against workers and changing forms of work organisation.

The Quality Jobs Act should therefore promote a modern understanding of occupational safety and health that addresses both physical and psychosocial risks. CESI supports updating existing workplace legislation to reflect mobile working and digital work environments and reiterates its previous call for EU legislation establishing a right to disconnect and fair telework. Such legislation should clarify employers' responsibilities concerning working time, psychosocial risk prevention, ergonomics and remote workplaces.

EU action should also require employers to assess climate-related hazards and establish procedures for extreme heat and severe weather, including timely warnings, safe work adjustments and the suspension of work where necessary to protect workers.

CESI further calls for reinforced European action against violence and harassment at work, particularly third-party violence affecting public-facing professions including health care, education, law enforcement, justice and public administration. Violence at work increasingly represents both an occupational safety challenge and an important cause of labour shortages. Measures addressing psychosocial risks should therefore

complement the implementation of the EU Directive on Combating Violence against Women while drawing upon established multisectoral European social partner guidelines.

Protection should extend to work performed away from an employer's premises, including field operations by public-facing workers such as customs staff, with risk assessments adapted to the actual place and conditions of work.

On fair subcontracting

CESI welcomes the European Commission's attention to problems in subcontracting chains. Legitimate subcontracting remains an important component of modern European economies. However, complex subcontracting arrangements can facilitate abuses, undermine collective bargaining, weaken accountability and create unfair competitive advantages for companies relying upon precarious working conditions.

Future EU action should therefore strengthen transparency throughout subcontracting chains while ensuring effective responsibility for compliance with labour standards. Joint and several liability mechanisms should guarantee that workers can effectively enforce their rights where subcontracting arrangements obscure employer responsibilities. Liability rules should enable workers to recover incurred damages, including financial damages, from the undertaking that controls the contract and commercial terms. In subcontracting chains, the principal contractor should bear responsibility for due diligence.

CESI also reiterates that future revisions of the Public Procurement Directives and relevant State aid rules should require meaningful social conditionality for decent work. Public resources should support enterprises that respect workers' rights, collective agreements and applicable wage standards rather than companies engaging in social dumping or abusive employment practices. These measures would reinforce quality employment while supporting fair competition throughout the Single Market.

On the management of labour market transitions

CESI agrees that Europe must better anticipate and proactively manage industrial transformations. Digitalisation, decarbonisation and labour force ageing will continue to reshape employment structures across sectors. These transitions should not result in deteriorating employment quality or increasing inequalities between workers.

The Quality Jobs Act should therefore reinforce lifelong learning, reskilling and upskilling opportunities throughout working lives. Particular attention should be given to workers employed in sectors undergoing substantial restructuring as well as older workers who require adapted career development and workplace organisation to remain safely employed until retirement. To anticipate restructuring, the European Commission should build on the existing EU Quality Framework for Anticipation of Change and Restructuring and assess its implementation, also in line with applicable provisions in Directive 98/59 on the approximation of the laws of the Member States relating to collective redundancies, Directive 2001/23 on the approximation of the laws of the Member States relating to the safeguarding of employees' rights in the event of transfers of undertakings, Directive 2002/14 establishing a general framework for informing and consulting employees, and Directive 2019/1023 on preventive restructuring frameworks.

At the same time, technological productivity gains should increasingly translate into improved employment quality. Successful AI deployment should ultimately contribute not only to higher competitiveness for companies but also to better working conditions, higher skills, stronger worker participation and broader social benefits.

On enforcement and the role of social partners

CESI strongly supports the European Commission's recognition that efforts for more effective social and labour law enforcement constitute an indispensable element of a future Quality Jobs Act. Existing European labour legislation frequently suffers less from insufficient or uneven implementation across Member States.

Future EU action should therefore strengthen labour inspectorates, improve cooperation between enforcement authorities and ensure effective, proportionate and dissuasive sanctions where labour legislation is violated. Infringement procedures against Member States should be rigorously and systematically introduced and pursued.

Equally important is strengthening inclusive social dialogue. CESI reiterates that all representative European trade union organisations - including independent trade unions identified as representative in Eurofound studies - should enjoy effective access to European social dialogue structures and proportionate and non-discriminatory financial opportunities for capacity-building by the European Commission. At Member State level, the implementation of the 2023 Council Recommendation on strengthening social dialogue should therefore become an integral element of the Quality Jobs Act.

Answer to question 3: What are your views on the possible instruments presented in section 8 of the European Commission's consultation document C(2026) 5109 of July 20 2026?

CESI welcomes the European Commission's consideration of a combination of legislative and non-legislative instruments. Given the breadth of the challenges addressed by the proposed Quality Jobs Act, a single instrument is unlikely to provide an adequate response. The consultation document correctly recognises that different policy areas may require different legal techniques while respecting the principles of subsidiarity, proportionality, Better Regulation and the diversity of national industrial relations systems. It also acknowledges that legislative action may appropriately be complemented by guidance, capacity-building and support for implementation.

CESI considers that the future initiative should clearly distinguish between those areas where binding minimum standards are indispensable to guarantee equal protection for workers throughout the EU and those where non-legislative measures can effectively complement existing legislation.

As such, core elements of the Quality Jobs Act should take the form of binding EU legislation, either through amendments to existing directives or stand-alone legislation. This is particularly important in areas of regulatory gaps, divergent national approaches or insufficient legal certainty. In particular, legislative action should :

- artificial intelligence (AI) and algorithmic management (AM) at work;
- occupational safety and health in light of new forms of work, including psychosocial, ergonomic and climate-related risks;
- protection of workers' rights in subcontracting chains, including appropriate liability mechanisms; and
- effective enforcement of workers' rights where existing legislation has proven insufficient in practice.

CESI recognises that non-binding instruments can play an important supporting role. Guidance can facilitate uniform implementation of complex legislative frameworks, particularly in rapidly evolving areas such as AI and AM at work, occupational safety and health in telework, and subcontracting governance. The European Commission should provide free model notices and tailored risk assessment tools for micro and small employers, including users of external prevention services or third-party software. Likewise, exchanges of good practices, capacity-building initiatives and technical guidance for labour inspectorates, employers and workers can strengthen implementation and reduce administrative uncertainty. However, such instruments cannot replace binding rights where minimum standards are required. Guidance should therefore complement legislation rather than substitute it.

CESI also supports the European Commission's proposal to strengthen capacity-building for social partners. An effective implementation of measures under the Quality Jobs Act will depend upon well-functioning and inclusive, pluralistic social dialogue at European, national and sectoral level. In this regard, capacity-building opportunities should be available to all representative trade union organisations in a proportionate and non-discriminatory way, thereby contributing to inclusive and functioning social dialogue consistent with the 2023 Council Recommendation on strengthening social dialogue.

Regarding simplification, CESI agrees that future legislation should avoid unnecessary overlaps with the existing acquis and should provide greater legal certainty for workers and employers alike. Nevertheless, simplification must never become synonymous with deregulation. As CESI has consistently emphasised, reducing administrative burdens cannot justify lowering employment standards or weakening workers' rights. Instead, simplification should be achieved through clearer legislation, improved coherence between existing legal instruments and more effective implementation and enforcement. New procedural duties may be phased in for micro and small employers, without postponing substantive worker protections. Reporting should primarily reuse information already held by public authorities.

Answer to question 4: Is your organisation willing to enter into negotiations with a view to concluding an agreement under Article 155 TFEU?

CESI is not involved in the cross-sectoral social dialogue.

The European Commission should swiftly issue a proposal/proposals for a Quality Jobs Act unless the recognised European cross-sector social partners can come to an understanding on an ambitious agreement to address the subject matter in a meaningful way.