Reply to the First-Phase Consultation under Article 154 TFEU on possible EU action for a Quality Jobs Act

Introduction

CEC European Managers welcomes the launch of the first-phase consultation on a Quality Jobs Act and the opportunity given to European social partners to contribute to shaping future EU action.

Managers are workers with specific responsibilities in the organisation of work, in the implementation of company strategies, and in the leadership of teams. They are directly exposed to the transformations of work linked to digitalisation, the use of artificial intelligence, new forms of work organisation, subcontracting, and the green transition. At the same time, they play a key role in ensuring that these transformations are implemented in a socially responsible way, in full respect of workers' rights, health and safety, and social dialogue.

CEC considers that quality of jobs, workers' well-being, sustainable work organisation and strong social dialogue are essential pillars of the European social model and must remain at the core of any future initiative.

1. Do you consider that the issues and possible areas for further EU action are correctly identified?

CEC agrees that the consultation document correctly identifies the main challenges affecting job quality in today's labour markets, in particular:

- the impact of algorithmic management and artificial intelligence on work organisation and workers' rights,

- occupational safety and health, including psychosocial risks and the organisation of telework and hybrid work,

- working conditions in subcontracting chains,
- the social dimension of the green and digital transitions,
- enforcement of existing rights and the role of social partners.

CEC particularly welcomes the recognition of the central role of social dialogue and collective bargaining in the effective implementation of EU labour law and in the anticipation and management of change.

From the perspective of managers' trade unions, the quality of jobs cannot be reduced to contractual status or income alone. It is closely linked to:

- sustainable work organisation and manageable workloads,
- workers' physical and mental health,
- access to training and career development,
- meaningful participation in decisions affecting work,
- trust, transparency and fairness in the use of digital technologies,
- the capacity of social partners to negotiate and implement solutions adapted to national and sectoral contexts.

CEC therefore considers that the scope of the consultation is appropriate and addresses key dimensions of job quality in the current phase of economic and technological transformation.

2. Do you consider that EU action is needed? If so, what should be the direction and scope?

CEC considers that EU-level action can bring added value, in particular where:

- structural transformations are common across Member States,
- rights are unevenly implemented or enforced,
- cross-border situations and complex value chains weaken the effective protection of workers,
- new technologies challenge existing regulatory and collective bargaining frameworks.

Such action should be guided by the principles of the European Pillar of Social Rights, respect for the diversity of national industrial relations systems, and a strong role for social partners at all levels.

a) Algorithmic management and Artificial Intelligence at work

CEC strongly supports EU action to ensure that the development and use of AI and algorithmic management at work fully respect workers' dignity, fundamental rights, health and safety, and collective rights.

From the managers' perspective, these technologies are increasingly used to support decision-making, work allocation, performance assessment and monitoring. When introduced without transparency, human oversight and social dialogue, they can lead to:

- loss of autonomy and professional judgement,
- work intensification and permanent availability,
- psychosocial risks,

- opacity and contestability problems in decisions affecting careers and working conditions.

CEC therefore supports EU initiatives that:

- reinforce the principles of human control, transparency and explainability,
- guarantee information and consultation of workers' representatives on the introduction and use of such systems,
- ensure that algorithmic tools do not replace managerial responsibility but remain supportive instruments,
- promote training of managers and workers to use these technologies in an ethical and socially responsible manner,
- ensure coherence between labour law, data protection, the AI Act and collective rights.

b) Occupational safety and health, including psychosocial risks and new forms of work

CEC welcomes the intention to modernise the EU occupational safety and health framework to better reflect:

- the widespread use of digital tools,
- telework and hybrid work,
- increasing psychosocial and organisational risks.

Managers are both exposed to these risks and responsible for their prevention within organisations. EU action should therefore strengthen:

- the integration of psychosocial risk prevention into OSH obligations,

- the assessment of workload, work intensity and work organisation,
- the role of social dialogue and collective agreements in defining preventive measures,
- the right of workers and managers to safe and healthy working conditions, including in remote and hybrid settings.

Approaches focusing on quality of working life and conditions of work, including structured spaces for collective discussion on work organisation, are particularly relevant in this context.

c) Green and digital transitions and anticipation of change

CEC underlines that the green and digital transitions profoundly transform skills needs, work content and employment structures. Managers are central actors in anticipating these changes, organising training, and implementing restructuring processes.

EU action should support:

- early and meaningful information and consultation of workers and their representatives, including at European level,
- social dialogue on transition strategies,
- access to lifelong learning and reskilling,
- a just transition that protects employment, careers and professional identities.

d) Subcontracting and responsibility along value chains

CEC supports initiatives aimed at ensuring that workers' rights and health and safety are effectively protected throughout subcontracting chains.

Managers often operate within complex organisational structures and should be supported by clear frameworks ensuring:

- transparency of responsibilities,
- effective enforcement of labour law,
- prevention of social dumping and unfair competition based on deteriorated working conditions.

e) Enforcement and role of social partners

CEC considers that strengthening enforcement and the capacity of social partners is a key dimension of any Quality Jobs Act.

EU action should aim to:

- reinforce the effective involvement of social partners in policy design and implementation,
- support collective bargaining and social dialogue structures,
- improve the implementation of existing EU labour and OSH legislation,
- ensure that rights are not only formal but effectively exercised in practice.

3. Would you consider initiating a dialogue under Article 155 TFEU?

CEC reaffirms its strong commitment to European social dialogue and recognises Article 155 TFEU as a fundamental instrument of the European social model.

Among CEC member organisations, there is a shared interest in exploring the potential of EU-level dialogue on issues such as:

- algorithmic management and AI at work,
- health and safety in digital and hybrid workplaces,

- anticipation and management of transitions,
- strengthening the role of social partners in enforcement.

At the same time, members express different sensitivities regarding the scope, timing and expected outcomes of possible negotiations under Article 155. While some see it as a promising avenue to develop binding and jointly agreed solutions, others underline the need for clear prospects of added value and successful outcomes before engaging in such a process.

CEC is therefore open in principle to further reflection on a possible Article 155 dialogue, provided that it:

- fully respects the autonomy of social partners,
- offers real negotiating space,
- takes account of the diversity of national systems,
- and can lead to concrete improvements in job quality and workers' rights.