

WEC-EUROPE POSITION PAPER

28 September 2026

A Quality Jobs Act that enables competitiveness and inclusiveness *Better labour market outcomes for all*

Quality Jobs are based on competitiveness enabling EU policies, matching the quest of companies and workers for flexibility, while ensuring social protection

OUR FIVE ASKS

With this position paper, the World Employment Confederation-Europe (WEC-Europe) responds to the EU Social Partner Consultation on an EU Quality Jobs Act. Our reply focuses on 5 asks:

- 1 **Real improvements in job quality in Europe must be built on an EU agenda for competitiveness, strengthened labour market participation and social inclusion.** Agency work as a flexible form of work is already strictly regulated. Simplified agency work industry regulation is essential to allow the industry to offer quality jobs. Appropriate regulation for agency work implies non-discriminatory conditions for establishment, no unjustified restrictions to provide services, a broad range of labour contracts and social protection based on the principle of equal treatment.
Growth case: Simplified labour market regulation not only protects workers, but also creates the relevant framework for job creation, competitiveness, and inclusiveness.
- 2 **As artificial intelligence and the use automated decision-making systems at the workplace are transforming the labour market and evolving rapidly, the national authorities must fully enforce existing EU law.** Where gaps exist, these must be addressed primarily by policy guidance and the use of non-legislative instruments.
Growth case: AI and innovative technologies have a net positive impact on job creation, while national and EU skills policies need to enable workers in lower skilled profession.
- 3 **Labour market intermediaries and subcontracting should be recognised as valuable mechanisms for organising work and delivering services.** Subcontracting tiers should not be limited at EU level, while focus should be laid on ensuring compliance with the well-established, national rules on subcontracting. WEC-Europe welcomes enforcement of existing rules across all sectors and does not support a focus on specific risk sectors.
Growth case: Quality focused labour market intermediation including subcontracting are essential to meet business needs and to stay competitive and compliant.
- 4 **Enabling Just Transitions Through Skills Development and Training.** The digital and green transition reshape labour markets, requiring an approach that combines effective implementation of existing EU legislation with skills and training policies that empower workers and cooperation of public and private employment services helps match skills with labour market needs and ensure that no worker is left behind.
Growth case: Europe's economy will only be able to grow sustainably if growth guided by enabling policies for just transitions focused on labour market policies and skills.
- 5 **Quality Jobs require proper legal compliance and enforcement.**
Growth case: A strong focus on compliance and enforcement of existing EU rules is enabling quality jobs while ensuring a responsible business conduct.

WEC-Europe will not initiate sectoral social partner negotiations on the topics of this consultation but has applied for EU-funded social dialogue project on Quality Jobs.

1. An EU Quality Jobs Act needs to drive competitiveness

The private employment services industry welcomes the EU discussions with social partners on a Quality Jobs Act, provided it is designed to promote competitiveness, innovation and ensures the protection of workers. While WEC-Europe recognises that EU labour law standards can play a role in ensuring quality jobs, sustainable quality employment in flexible and dynamic labour markets requires the right balance of legal frameworks, employment, and skills policies. In the current and mid-term economic context, characterised by more economic uncertainties, demographic ageing and the digitalisation of economies, the focus needs to be laid on an agenda for competitiveness and social inclusion. A classification of jobs in quality vs low-quality jobs is not meeting economic and social needs especially in Europe, which is a region characterised by comparatively a high job quality. Agency work and private employment services are a leading example of combining labour market flexibility and job quality. The private employment services industry therefore calls for a strong framing of a potential EU Quality Jobs Act, by a particular focus on quality standards in the world of work, labour market participation, and the EU competitiveness agenda.

The EU debate on a Quality Jobs Act must also be intrinsically linked to the role of European and national social partners, as well as social dialogue at European, national, and sectoral levels. This is why WEC-Europe and UNI Europa Agency Workers have placed a strong emphasis on quality jobs within their current EU Sectoral Social Dialogue Work Programme and have applied for EU funding for a Quality Jobs project to be implemented by the EU Sectoral Social Partners in 2027 and 2028 by the EU Sectoral Social Partners.

WEC-Europe agrees that EU policymakers need combined Quality Jobs with health and safety at work. EU rules on health and safety, including the Workplace Directive, should take a cross-sectoral approach and do not require sector specific rules for the agency work industry.

2. Algorithmic management and automated decision making at work – Focus on existing instruments and skills

Algorithmic management is an important element in the transformation of the world of work today.¹ Evidence from the OECD,² the European Commission, and the World Employment Confederation demonstrates the use of algorithms in the workplace is fundamentally reshaping labour markets, skills requirements, and work organisation. While there is substantial evidence that automation may replace certain manual and routine tasks, technological innovation is also creating demand for new and more highly skilled occupations. This highlights the need for a comprehensive approach to reskilling and upskilling Europe's workforce, ensuring workers are prepared to adapt to technological change and fully benefit from the opportunities offered by technology and innovation.

The World Employment Confederation has been at the forefront of promoting the responsible use of algorithms and automated decision-making within the private employment services industry through its *Code of Ethical Principles in Artificial Intelligence*.³ The Code is based on a human-centric approach, emphasising human oversight, transparency, explainability and traceability of AI systems, as well as fairness and inclusiveness by design. Additional principles address privacy, safety and security, accountability, ethical governance, human capacity-building, and environmental and societal well-being. The elements mentioned by the European Commission in the consultation document are therefore already sufficiently addressed for the private employment services industry in our Code of Ethical Principles in Artificial Intelligence. Through regular engagement with its members and relevant stakeholder groups, the World Employment Confederation works to ensure that these principles are effectively implemented, enabling a quality-driven and responsible use of automated decision-making systems in employment services.

¹ See also the WEC The Work We Want project: [The Work We Want - World Employment Confederation](https://www.wec-europe.org/the-work-we-want)

² See also the OECD Employment Outlook 2023: [OECD Employment Outlook 2023 | OECD](https://www.oecd.org/publications/employment-outlook-2023/)

³ See also WEC Code of Ethical Principles on the use of AI: [AI-principles-WEC-AI-Code-of-Conduct-March-2023.pdf](https://www.wec-europe.org/wp-content/uploads/2023/03/AI-principles-WEC-AI-Code-of-Conduct-March-2023.pdf)

In recent years, the European Union has taken important steps to establish a robust regulatory framework governing the use of automated decision-making in the workplace. Key legislative instruments include the EU Artificial Intelligence Act, the EU General Data Protection Regulation (GDPR), and the Platform Work Directive. WEC-Europe broadly welcomes these initiatives, as they are important in ensuring the ethical, transparent, and responsible use of digital technologies across European labour markets. At the same time, EU rules on digitalisation, data protection and the use of automated decision-making must be guided by the principle of regulatory simplification and complementarity. Already today, the overlap and inconsistency of existing rules create challenges for the private employment services industry. WEC-Europe calls upon the European Commission to intrinsically link rules on digitalisation with the simplification agenda. To ensure the appropriate use of automated decision-making, WEC-Europe collaborates closely with its members, to develop practical tools and guidance that facilitate compliance with EU legislation. These initiatives include an AI Act compliance toolkit, guidance on the transposition of the Platform Work Directive, and practical resources on the application of the GDPR. An example of the need for simplification is Article 22 of the GDPR on automated individual decision-making. Using the full potential of automated decision making does not require additional EU rules, but a focus on compliance and regulatory simplification. More human control of automated decision-making risks to create serious barriers to how workers can digitally access jobs and how the private employment services industry will use digital tools for effective and fast job matching.

In addition, several WEC-Europe members actively contribute to policy discussions on digitalisation, automated decision making and the transformation of the world of work through research and evidence-based analysis. Recent studies by The Adecco Group, for example, indicate that AI is more likely to transform job tasks and redefine job profiles than to lead to widespread unemployment. At the same time, these studies highlight a growing gap between organisations' ambitions to adopt AI and the readiness of the workforce to use it effectively. Addressing this gap through skills development, social dialogue, and responsible governance will be essential to ensuring that AI enables both competitiveness and quality employment in Europe. WEC-Europe welcomes the shift in the Quality Jobs Act consultation from further regulating the use of automated decision-making and algorithmic management at work towards policy guidance, application of existing norms.

3. Subcontracting and the role of intermediaries

A further central dimension in the consultation on a Quality Jobs Act is the role of subcontracting and labour market intermediaries. WEC-Europe is convinced that labour market intermediaries, temporary work agencies and subcontracting play a significant role in increasingly specialised economies and labour markets.

As highlighted in WEC-Europe's response to the first-stage consultation on a Quality Jobs Act, it is essential to frame the discussion on subcontracting and the role of intermediaries appropriately. Temporary agency work is a form of employment that is strictly regulated by both national and European law and involves a temporary work agency acting as the employer of an agency worker within a triangular work relationship. At EU level, temporary agency work is regulated by the Directive on Temporary Agency Work, while at the global level private employment agencies are regulated through ILO Convention No. 181. WEC-Europe considers these labour law instruments to be fully appropriate and highly valuable in enabling the industry with a focus on job quality and social protection and to contribute to job creation, labour market participation, and inclusiveness. As demonstrated by the latest Eurofound study on temporary agency work,⁴ the sector is already comprehensively and strictly regulated at national level.

The labour market and job-quality dimensions of subcontracting are not currently governed by a dedicated EU-level instrument. Research published by the European Employers Institute⁵ confirms that there is indeed no need for EU regulation of subcontracting, as it is sufficiently covered by national instruments. More specifically, it is neither appropriate nor necessary to limit the tiers of subcontracting or to introduce restrictions on subcontracting in specific "high risks" sectors that have featured prominently in public debate.

⁴ Eurofound: [Representativeness of the European social partner organisations: Temporary agency work sector – 2025 | Eurofound](#), especially its chapter 1 on the characteristics of temporary agency work.

⁵ European Employers Institute (EEI): [EEI legal study explores risks of restricting subcontracting and its impact on business freedom in the EU - EEI](#)

The consultation document refers to challenges include working conditions, payment of fees by workers and the absence of quality standards. Here, WEC-Europe underlines that all its members are bound by and comply with the Code of Conduct that sets common standards and quality criteria globally, including compliance with the law, the principle of not charging fees to job seekers for work assignments, privacy and transparency of the terms and conditions of engagement.⁶

WEC-Europe therefore calls for a policy approach focused on ensuring compliance with, and effective enforcement of, existing national rules on subcontracting. Compliance and enforcement of existing, national rules on subcontracting is best be done at the national level by the competent national authorities, while the European Labour Authority can play an important role in terms of strengthening the capacity of national enforcement authorities, sharing good practices and addressing compliance elements in subcontracting chains that have a strong, transnational dimension and/or include the posting of workers. WEC-Europe does not see the need for any additional, European rules on subcontracting and the role of labour market intermediaries to ensure that companies offer quality jobs and that working conditions are protected.

4. Quality jobs need to be coupled with just transitions

Labour markets in Europe are subject to fundamental transformations, with two of the most profound changes being the green (“just”) and digital transitions. WEC-Europe is convinced that digital and just transitions to a carbon neutral economy must start with the clear, legal definition of climate targets. A strong focus then is needed on skills for workers and an enabling environment for labour market transitions from sectors in decline or subject to restructuring to new economic sectors increasing in demand and more cooperation between public and private employment services. The digital and green transitions thus imply a social transition. The EU Network of Public Employment Services should serve as a platform for its benchlearning programme to ensure that just transitions are matched with quality jobs. Career management services of the private employment services industry play a key role in economic restructuring and enabling workers in labour market transitions.

Despite some EU debates on more legislation on just transitions, WEC-Europe calls for prioritising non-legislative instruments to implement just transitions, such as policy guidance, the use of the European Semester process, EU funding and the EU Sectoral Social Dialogue as a key platform to just transitions and to adopt tailored solutions. Since 2022, one of the WEC-Europe members, namely The Adecco Group, has frequently published evidence and research on the green and just transitions.⁷ The research illustrates that in the world of work, this means a greater shift toward careers that help protect and sustain the Earth, and providing the appropriate education to develop the skill sets needed for the transition to green jobs for a green economy.

5. Quality jobs require compliance and enforcement of EU norms

WEC-Europe appreciates the EU Commission focus on the compliance with and enforcement of existing EU rules on quality jobs, as it has for over 20 years been a strong advocate for the enforcement of appropriate private employment services regulation. The enforcement of existing EU and national rules are an essential precondition for job quality. Compliance and enforcement are a shared responsibility of the EU institutions and the EU Member States regarding EU law.

National and sectoral social partners bear a key responsibility in upholding and ensuring compliance with collective labour agreements in countries with a strong social dialogue tradition. In the agency work industry, collective labour agreements are also used to provide access to training, social protection, portable and transferable benefits for the agency workers. The tradition of regulating social benefits through collective labour agreements and bipartite funds is particularly strong in the Netherlands, Italy, France, Belgium, and Spain. At the same time, there is a significant diversity of social dialogue practices across Europe, and any social dialogue solution must reflect national realities. Collective bargaining can therefore not be a mandatory element of what constitutes a quality job. WEC-Europe and UNI-Europa, the EU Sectoral Social Partners for

⁶ WEC Code of Conduct: [Code of Conduct - World Employment Confederation](#)

⁷ The Adecco Group: Skills for the Green Transition: [The Green Transition in the World of Work: A Progress Report](#)

agency work, agreed in their current work programme⁸ to conduct a joint project on quality jobs in the temporary agency work in the coming years to contribute to the quality jobs debate through evidence and mutual learning.

6. Social Partner involvement in a Quality Jobs Act

WEC-Europe and UNI-Europa have applied for an EU funded joint project on topics related to a potential Quality Jobs Act to analyse quality jobs in the agency work industry regarding the use of automated decision-making and AI and to social protection for agency workers. WEC-Europe considers that if these topics are subject to EU Social Partner negotiations, these should be held at cross-industry level between the cross-industry social partners.

Find out more about the World Employment Confederation-Europe: www.weceurope.org

⁸ Information on the EU Sectoral Social Dialogue on temporary agency work can be found here: [Social Dialogue - World Employment Confederation Europe](#)