

Minutes – 268/26 – 16 October 2026

5th Artificial Intelligence working group

DATE: 1/10/2026

LOCATION: Online

The Chair Ville Leppäniemi welcomed the **participants** (enclosure 1) and entered into the **agenda** (enclosure 2). The **slides** presented during the meeting are attached as *enclosure 3*.

I. Presentation of AI Employment Guidance

1. Presentation by Tiago Cabral, Legal and Policy Officer in Unit A2 AI Regulation and Compliance, EU Commission

Tiago Cabral presented the updates on the AI Guidance in employment (presentation enclosure 4). He highlighted that the organisation of the consultation process was well received, with a high level of engagement and many detailed responses from stakeholders. The process is progressing, and the final version of the guidance is expected in the coming weeks.

Content-wise, no changes to the AI Act are currently foreseen regarding employment.

The guidance covers the AI systems listed under Point 4 of Annex III of the AI Act, in particular two main areas: employment and recruitment processes and employment-related relationships.

The guidance aims to clarify the scope of these two areas and provide greater legal and practical clarity. The final version is expected to include more clarification than the AI Act itself, reflecting the responses to the consultation and feedback received from stakeholders.

The scope of recruitment is understood to cover the process from the publication of a job vacancy through to the conclusion of the employment contract, where applicable. The selection of natural persons also raises questions regarding self-employed workers, including the use of assessment or filtering tools. There were differing views among stakeholders regarding targeted job advertisements, and this remains an area requiring clarification.

One example discussed was a job position based in Brussels where applications from candidates located in other countries are not accepted. The guidance should clarify how the relevant geographical scope is determined.

Termination may also fall within the scope where, for example, access to or an account on a platform is terminated.

The classification of an AI system as high-risk does not mean that its use is prohibited. Rather, it triggers additional requirements that must be complied with, provided that the use of the system is justified.

Stakeholders made numerous requests for practical examples and, at the same time, asked for the guidance to remain concise. The Commission is therefore trying to find a balance between providing sufficient practical clarification and keeping the document manageable.

2. Q&A session

HRM Human resources management

Lorenzo Dell'Aqua highlighted that companies in Italy have several concerns regarding the interpretation of the AI Act by the HRM.

Tiago Cabral explained that those concerns have been raised regarding the scope of the relevant provisions and the interpretation provided in the guidance.

It was reiterated that where an AI system is used exclusively for the protection of workers, it falls outside the relevant employment-related scope of the AI Act.

Paragraph 2.7.7 of the guidance clarifies the distinction between systems used to protect workers and systems used to monitor or evaluate them. Where an AI system is used to evaluate individuals or monitor behaviour for the purpose of protecting people, it would not fall within the relevant employment use case. However, where the same type of system is used for employee monitoring or evaluation, it may qualify as a high-risk system, although this does not mean that its use is prohibited.

Tiago indicated that the final version of the guidance will be further improved. However, it is not expected to substantially deviate from the current approach and should be finalised shortly.

The guidance clarifies that AI systems deployed by employers exclusively to comply with external legal or regulatory obligations—for example, transaction logging to comply with financial market abuse rules—should not be considered as monitoring or evaluating an individual's performance or behaviour for employment purposes, provided that they are not also used for such purposes.

Similarly, AI systems deployed purely and exclusively for medical or safety reasons, or to protect property and company assets, are outside the notions of monitoring or evaluating an individual's performance or behaviour for employment purposes.

Consequently, these systems would not fall under the use cases listed in Point 4(b) of Annex III of the AI Act.

Link to the Guidance: [Draft Commission guidelines on the classification of high-risk AI systems | Shaping Europe's digita...](#)

Kresimir Iveskic raised the issue of **algorithmic management**, noting that discussions with different Commission officials can sometimes result in different interpretations. He referred to the **Quality Jobs Act (QJA)** and stressed the importance of cooperation to ensure consistency between the different initiatives.

Tiago answered that at the level of **AI system providers**, the AI Act already establishes a comprehensive framework covering the development and provision of AI systems. No major modifications are currently expected in this area.

At the level of **deployers**, the consultation process is still examining certain specific cases and potential new proposals.

The AI Act already covers several aspects of algorithmic management, including the **monitoring and evaluation of workers' behaviour and performance**, as well as certain decisions affecting employment relationships.

However, some specific workers' rights are not directly addressed by the AI Act, including **information and consultation rights**. These could therefore be relevant in the context of the QJA. The objective is to ensure that the QJA does not create unnecessary overlap with obligations that employers already have under the **GDPR and the AI Act**.

Employment Relationships and Day-to-Day Management

Ville Leppäniemi asked for clarification on which decisions concerning the terms of an employment relationship would fall within the scope of the AI Act.

It was discussed that decisions concerning the **terms of an employment relationship** may fall within the relevant scope, while routine day-to-day operational management is generally not intended to be covered.

Examples of day-to-day operational decisions could include routine decisions concerning working arrangements or scheduling. Ville asked whether the guidance could provide further nuance regarding the distinction between **day-to-day management and decisions affecting the employment relationship**.

Tiago Cabral indicated that further clarification on this distinction is expected in the final version of the guidance. The approach is based primarily on the limits and specific restrictions established by the relevant legal provisions, including restrictions relating to the terms of the employment contract. **Article 26 of the AI Act** also establishes obligations for deployers, including requirements relating to human oversight and the protection of fundamental rights, health and safety.

The underlying principle is that AI systems must be **appropriate for the specific use for which they are deployed**.

Human Oversight

Pauline Dubois-Graffin raised the concept of **human oversight** and asked how it should be understood in practice.

Tiago Cabral explained that human oversight involves two sets of obligations. First, **Article 14 of the AI Act** establishes obligations for providers to ensure that systems are technically designed to enable effective human oversight.

Secondly, deployers also have responsibilities regarding human oversight when AI systems are used in practice. In practical terms, human oversight can involve reviewing the outputs and data generated by an AI system and intervening where an issue is identified.

Training is particularly important in this context. The individuals responsible for human oversight need to be appropriately trained and understand both the system and the decisions they are making.

Tiago noted that human oversight can take different forms depending on the AI system and its specific use case and confirmed to **Katelijne Cielen** that further guidance on this issue is expected.

Avoiding Overlap Between EU Legislation

Ville Leppäniemi asked how the Commission is ensuring that the different legislative initiatives and guidance do not overlap.

Tiago Cabral explained that a significant number of people are involved in reviewing and coordinating the different pieces of guidance. Avoiding unnecessary overlap is considered an

important part of the process. He noted that the QJA can sometimes become less clear when several existing legal frameworks already address the same issue. The approach is therefore to first assess **what is already covered by existing legislation or guidance** and then determine whether something new needs to be introduced.

Ville Leppäniemi asked whether the interaction between the AI Act and the GDPR, as well as the wider EU legal acquis, is being taken into account.

Tiago Cabral confirmed that the exercise considers **all relevant legal frameworks**, including the AI Act and GDPR.

Different Commission services and teams, including **DG EMPL and DG CONNECT**, are involved in the discussions. While there may be different views during the process, the teams cooperate to avoid overlaps and ensure consistency with existing EU and national legislation.

Self-Employed Workers

Lucile Uhring commented that it would be useful to have a clearer distinction between **self-employed workers and employees**.

Tiago Cabral explained that the guidance must remain within the boundaries of the existing legislation and cannot introduce an interpretation that contradicts the AI Act.

In the context of **Annex III and high-risk AI systems**, self-employed persons can be covered where they fall within the relevant legal provisions. The guidance will therefore clarify the scope where possible, while remaining consistent with the legislation.

Future Guidance and Work Programme

Participants asked for a clearer overview of **which topics will be addressed in future guidance and when the next guidance documents are expected**, in order to have a better understanding of the Commission's agenda.

Tiago Cabral explained that the Commission is working on a broader list of guidance documents, but it is difficult to provide a precise sequence because each document goes through an internal process of drafting, review and validation.

Some guidance documents can therefore progress more quickly than others.

Among the areas currently being developed or advanced are:

- practical guidance on **Article 50**;
- practical guidance on **reporting serious incidents**;
- practical guidance on **AI system classification**;
- Practical guidance on **fundamental rights impact assessments** for relevant high-risk AI systems;
- practical guidance on **responsibilities across the AI value chain**;
- further guidance concerning the **interaction with the GDPR**.

Link to the list guidelines:

[IMMC.COM%282025%29836%20final.ENG.xhtml?l_EN_ACT_part1_v7.docx](IMMC.COM%282025%29836%20final.ENG.xhtml?l_EN_ACT_part1_v7.docx)

Work on **standards** is also advanced in the process.

Tiago Cabral noted that practical guidance on the **classification of AI systems** and other priority topics is progressing, while the exact publication sequence remains subject to the internal validation process.

Machinery Directive

Lorenzo Dell'Aqua raised a question regarding the interaction between the new Machinery Regulation and the AI Act, particularly in relation to machinery and robotics.

Tiago Cabral explained that there are several elements to consider, as the two regulatory frameworks can apply depending on the type of machinery and AI system involved.

For traditional machinery and robots that are not based on GPAI models, the Machinery Regulation will generally provide the relevant safety framework.

The new AI Act also establishes an interaction with the Machinery Regulation. Certain AI-related requirements concerning the safety of machinery are being transferred from Annex A to Annex B of the AI Act and will be implemented through the relevant machinery framework and delegated acts. Work on this interaction is still ongoing, with a 2028 deadline for the relevant provisions, meaning that there is still time to finalise the implementation approach.

Where a robot or machinery system incorporates a GPAI model, the AI Act may also apply at the model level. In such cases, the AI Office can address requirements relating to the GPAI model itself, including aspects relevant to the safety of systems using the model.

The Commission is therefore continuing to work on the division of responsibilities and the interaction between the AI Act and the Machinery Regulation, particularly to ensure that safety requirements are properly addressed without unnecessary regulatory overlap.

II. Latest update on AI at national and EU level

1. Update on legislative developments & collective agreements from Ceemet members

Lucile Uhring explained that she has been informed that at decision of President von der Leyen no legislation will be adopted on AI in QJA. However, **Pauline Dubois Graffin** highlighted that even if DG GROW and DG CNET don't want a new initiative on this file, DG EMPL will not abandon the idea to propose new provisions on algorithmic management.

Round table on national experiences about the AI Act in the field of employment/HR

France: End of September, the French labour ministry has launched "**Impulsion IA 2027**", a 12-measures plan to prepare the world of work for AI. More than €80 million will be mobilised over the next year, with the ambition of reaching more than 30 million people through AI awareness and training.

The plan includes several concrete measures. For example, there will be a free public platform called "Explore IA" to help people understand and use AI. New generative AI training programmes will be developed for apprentices, and a national AI certification will also be introduced.

The government also wants to support companies, especially SMEs, with their AI transition. An experiment will provide HR support to small companies to help them identify the skills and jobs affected by AI and adapt their organisation accordingly.

Finally, the plan puts emphasis on social dialogue. An Observatory on the impact of AI on work will be created, and sector-level social dialogue will be supported to discuss the effects of AI on jobs, skills and working conditions.

Regarding social dialogue, some of our big member companies recently signed collective agreements on AI:

Thales has concluded the agreement recently, but we don't have more details.

Schneider Electric (*enclosure 5*)

Schneider Electric concluded a Group agreement on **22 May 2026** covering the deployment of artificial intelligence and social dialogue. The agreement also includes a separate section on environmental issues.

On AI, the agreement focuses on five main areas:

- Anticipating the impact of AI: the agreement aims to anticipate the effects of AI on jobs, skills, work organisation and working conditions.
- Responsible use of AI: it sets out principles including human oversight, data protection, transparency, fairness, robustness and accountability. Employees remain responsible for checking AI-generated content, and final decisions remain with humans.
- Training and skills: Schneider commits to developing employees' AI skills through training, including training on generative AI, Copilot, prompting and critical thinking. Training is adapted to different jobs and levels of expertise.
- Integration of AI into existing social dialogue: AI is to be taken into account in recurring the Works Council consultations, specific consultations on significant AI projects, and the Group's Employment and career pathway management policy, particularly when AI affects employment, skills or requires retraining.
- Creation of a dedicated AI and Social Dialogue Commission (main feature of this agreement) : a Group-level commission is created on an experimental basis. It will meet at least twice a year, monitor major AI projects and discuss their potential impact on employment, skills, work organisation and working conditions. It has an information and anticipation role, but no decision-making power and does not replace the existing works councils.

Sweden: no particular updates

Italy became the first EU country to pass a comprehensive national AI law aligned with the EU AI Act. This law has been in force since 10th of October 2025. The government presented it as a human-centred framework promoting transparent and safe use of AI, with an emphasis on innovation, cybersecurity and privacy protection across multiple sectors.

On 10th June 2026, the Council of Ministers gave preliminary approval to two draft legislative decrees implementing the law. The aim is to govern the technological transition through a human-centred approach, ensuring that innovation remains at the service of fundamental rights and human dignity. The drafts still require opinions from the parliamentary committees and other bodies, followed by final approval by the Council of Ministers before the mandate expires on 10th October 2026.

The legislation introduces cross-sector rules covering healthcare, labour, public administration, justice, education and sport, requiring traceability and human oversight of decisions made by AI. It includes specific measures on:

- parental consent for access to AI for children under 14

-new criminal provisions against the unlawful dissemination of AI-generated content, such as deepfakes, punishable by one to five years in prison if they cause harm
-harsher penalties for any crime committed through AI systems, for example identity theft and fraud. The fact that the crime is committed through AI systems is an aggravating circumstance.

Lorenzo Dell'Aqua outlined a program with three main pillars:

- Legal pillar: focusing on legal issues and the practical application of AI-related legislation.
- Technical pillar: providing technological expertise and support.
- Assolombarda / EU factories: conducting studies on the application of AI in occupational health and safety, which will be shared with participants.

He also mentioned the launch of Master's programmes on AI in cooperation with two universities, as well as internship opportunities for students from Politecnico di Milano and the University of Milan (enclosure 6).

Austria: There is currently no additional legislation or specific agreement on AI. The focus is primarily on the practical implementation of existing rules.

UK: The AI Act is particularly relevant for larger manufacturers that trade with the EU, with uncertainty around the definition and application of high-risk AI systems. The UK Government currently shows limited appetite for following the EU approach to AI legislation and is expected to introduce its own regulatory framework focused on growth. It remains unclear whether specific provisions on AI will be included, despite trade unions calling for stronger regulation. The new Prime Minister has emphasised closer alignment with the EU, so further developments should be monitored. The Government is also investing significantly in AI training, including a programme targeting around 10,000 trainees, although the training is currently considered relatively high-level.

Türkiye: does not directly apply the EU AI Act, although companies operating in or trading with the EU may be indirectly affected. Data protection is currently the main priority, with regulation focusing strongly on this area. A dedicated AI law has been introduced in Parliament and is still under consideration. Data protection issues, particularly in relation to generative AI, remain a key concern.

Belgium: there is currently no specific AI legislation or agreement with trade unions. Several initiatives and studies are focusing on skills, providing advice and guidance on how companies and workers can manage the transition. There is significant support and a number of initiatives in this area, but these have not yet been formalised through an agreement.

Germany: in late July 2026, the German Government introduced the AI KIMAG, creating a national framework intended to correspond with the EU AI Act.

Finland has had an employer-friendly government for around 40 years, although the next parliamentary elections will take place in April. At present, AI legislation is not a major item on the political or trade union agenda. AI is also only lightly addressed in collective bargaining compared with some other countries, and there is currently limited demand for specific provisions on AI. The next round of collective agreement negotiations is expected in the autumn, and AI could become part of these discussions. In the ICT sector, there is currently a clause stating that AI can be taken into account in employees' personal development plans, but this does not provide

employees with a specific right. The insurance sector also has a collective agreement addressing AI-related issues.

The situation may change next autumn, when trade unions are expected to push for stronger provisions on AI in collective agreements.

2. Ceemet update on AI

a. Ceemet reply to 2nd stage consultation on Quality Job Act

Pauline Dubois-Graffin shared the PTT (enclosure 3) on 7 October 2026

b. AI Omnibus

Pauline Dubois-Graffin shared the PTT (enclosure 3) on 7 October 2026

III. Exchange on AI and Job Quality

1. Presentation on AI & Job Quality by Davide Monaco, CEPS

Davide Monaco opened by noting that, while we cannot predict the future, we can look at what is already happening and learn from current developments (Presentation enclosure 7)

He presented the AI at work framework, focusing on two main dimensions: production functions and governance functions.

- The production function covers the use of AI and technology in the workplace, including decision-making tools, generative AI and robotics.
- The governance function focuses on algorithmic management, including Algorithmic Management (AM) and Algorithmic Human Resource Management (AHRM).

Davide highlighted that there are different types and applications of AI, covering different tasks and functions, and that the impact can vary depending on how these technologies are implemented.

He also discussed the concept of job quality, describing it as a multidimensional concept that goes beyond individual working conditions.

Q&A Session

Lorenzo Dell' Acqua highlighted the outcomes of discussions with companies regarding the implementation of AI projects. In particular, companies emphasize the importance of involving workers through training and information to prevent resistance to the introduction of new technologies.

Davide Monaco agreed that worker involvement should be a priority. He argued that greater employee involvement can ultimately lead to positive outcomes for employers as well, creating a potential win-win situation.

Ville Leppäniemi raised the question of algorithmic management, noting that it is a broader concept than AI. He asked for Davide's views on the regulation of algorithmic management, including situations that may fall outside the scope of the AI Act, such as certain platform-based systems or workplace tools such as automated time-recording systems. He also asked about the potential impact of algorithmic management on job quality.

Davide Monaco said he would not draw a strict distinction between AI-based algorithmic management and algorithmic management without AI. From an employee perspective, the key issue is the function and its impact rather than whether AI is technically involved. For example, task allocation can have a similar impact on employees regardless of whether it is carried out through AI or another form of algorithmic management. He therefore suggested keeping the definition broad enough to capture both situations.

Davide also clarified that industrial relations and social dialogue should be considered as dimensions of job quality. They provide an institutional framework through which workers can have a voice and influence decisions, and should therefore be taken into account when assessing overall job quality.

IV. AOB

1. Date of next meeting in presence with company visit

Participants required the possibility to combine the AIWG and Health and Safety Committee to travel once a year.

Pauline Dubois-Graffin will send a doodle for the next date and will coordinate this demand with **Hilde Thys**.

Enclosure 1 – 268/26– 16/10/2026

AI Working Group
Online, 1st October 2026

Participant list

Organisation	Name
Austria (WKO)	Ulrike Wiesner
Belgium (Agoria)	Katelijne Cielen
Finland (TIF)	Ville Leppäniemi
France (UIMM)	Lucile Uhiring
Germany (Gesamtmetall)	Jana De Coster
Italy (Assolombarda)	Lorenzo Dell’Acqua Federica Perriccioli (Federmeccanica)
Sweden (Technologies of Sweden)	Rebecca Norell Kresimir Iveskic
Turkiye (MESS)	Burak Zafer Akalin
UK (Make UK)	Nina Gryf
Ukraine (ULIE)	Svitlana Kutseva
Ceemet	Pauline Dubois-Graffin

Enclosure 2 268/26- 16/10/2026

**AI Working Group
Online, 1st October 2026**

Final agenda

I. Presentation of AI Employment Guidance

1. Speaker: Tiago Cabral, DG CONNECT, EU Commission
2. Q&A session

II. Last update on AI at national and EU level

1. Update on legislative development & collective agreements from Ceemet members
2. Ceemet update on AI

III. Exchange on the impact of AI on quality job

1. Speaker: Davide Monaco
2. Q&A session

- Enclosure 3** PTT of Ceemet (received on 7 October 2026)
Enclosure 4 Presentation by Tiago Cabral, EU Commission (received on 7 October 2026)
Enclosure 5 Schneider Electric agreement (received on 7 October 2026)
Enclosure 6 Excerpt from the Politecnico di Milano study (received on 7 October 2026)
Enclosure 7 Presentation by Davide Monaco, CEPS (received on 7 October 2026)

AI Working Group
Online, 1st October 2026

Briefing Note from Agoria (Belgium) on Artificial Intelligence in Belgian Sectoral Social Dialogue: Joint Committee 200

Key message

Artificial Intelligence has now explicitly entered **Belgian sectoral social dialogue**. In the 2025-2026 agreement of **Joint Committee 200 (PC 200)**, the social partners included a dedicated section on AI and digitalisation.

The approach is noteworthy because it does **not create a detailed additional layer of AI regulation**. Instead, it establishes a common, human-centred framework focusing on **skills, social dialogue, transparency, human involvement, wellbeing and trust**.

A positive but balanced approach to AI

The agreement acknowledges the opportunities offered by digitalisation and AI for **productivity, innovation, efficiency and quality work**, while at the same time recognising potential consequences for skills, job content, tasks, work processes and work organisation.

The underlying principle is therefore not to resist technological change, but to support a **human-centred and sustainable digital transition**.

Five central elements

1. Skills and employability

Continuous skills development is central to the agreement. Companies are encouraged to invest both in technical skills, including AI and digital tools, and in human skills such as cooperation, communication and ethics.

Workers with particular expertise or interest in AI can also act as drivers or ambassadors of innovation, helping colleagues and sharing good practices.

The sectoral training organisation CEVORA is given a concrete supporting role, including the development of AI-related training. The agreement refers to different levels of digital skills, up to advanced technologies including AI applications, machine learning and generative AI tools.

2. Social dialogue

Where new AI systems may have significant collective consequences for employment, work organisation or working conditions, social partners recommend addressing these developments through company-level social dialogue.

The agreement links this to the existing regulatory framework, explicitly referring to the EU AI Act, CBA No. 39, CBA No. 81 and GDPR.

This is an important feature of the Belgian approach: the agreement builds on existing social dialogue structures and legislation rather than establishing a parallel sectoral regulatory system for AI.

3. Transparency and human involvement

Companies are encouraged to communicate clearly and accessibly about how and why AI technologies are being used.

At the same time, human involvement remains important, particularly for sensitive decisions. The agreement therefore seeks a balance between the advantages of technology and human experience.

4. Wellbeing at work

AI is recognised as a potential contributor to more efficient work, but the agreement also calls for attention to its impact on work and wellbeing.

Digital literacy, resilience and healthy use of technology are identified as elements that can support workers' wellbeing. The agreement also encourages the exchange of experience to find an appropriate balance between productivity and workable work.

5. Trust, data and privacy

Trust is considered a prerequisite for successful AI implementation. The agreement therefore emphasises clear organisational arrangements and awareness regarding data collection, data management, data security and privacy.

The agreement remains deliberately principle-based. PC 200 establishes a framework for responsible AI adoption rather than detailed technological regulation.

Source: PC 200 sectoral agreement 2025-2026.