GUIDELINES FOR MONITORING AND MANAGING THE AI AT COMPANY LEVEL

SOCIAL PARTNERS TOGETHER TOWARDS A BETTER AND EFFECTIVE REGULATION OF ARTIFICIAL INTELLIGENCE FOR A JUST TRANSITION TO THE WORK OF THE FUTURE
TRANSFORMWORK 2 - 101145650

Co-funded by the European Union

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TransFormWork 2
Project 101145650

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INTRODUCTION

The TransFormWork 2 project: *Social partners together towards a better and effective regulation of Artificial Intelligence for a just transition to the work of the future* brings together national social partners from seven EU Member States (Bulgaria, Cyprus, Ireland, Italy, Malta, Poland, and Romania) to develop joint solutions for managing the impact of AI and algorithmic management and its massive impact on the work of the future; to address the important issues related to the employment relationship; to find appropriate mechanisms, practices and initiatives for a timely anticipation of the skills needs of tomorrow; and a forward-looking up and upskilling/reskilling of the existing workforce - a fundamental to the success of an AI that works for all.

The Guidelines are based on and build upon:

» Key EU instruments related to AI regulation including the European Social Partners' Autonomous Framework Agreement on Digitalisation (2020), the EU AI Act (Regulation (EU) 2024/1689), the Platform Work Directive ((EU) 2024/2831), on upcoming initiatives on quality jobs and algorithmic transparency; data governance and ethical use;

» Studies to what extent algorithmic management through the use of artificial intelligence has entered the partner countries and existing regulatory and social-dialogue responses in those countries.

The development of these **Guidelines for monitoring and managing the AI at Company level** is part of the implemented research activities in the framework of this project and they highlight national practices for implementing the two core pillars of the Framework Agreement on Digitalisation:

» The Human-in-Control Principle in workplace algorithms

» Respect for human dignity and protection against excessive surveillance.

The shared **national inputs** follow a common structure and present concise national overviews, such as binding and non-binding initiatives, the role of social dialogue, company/sectoral case studies and provide practical lessons for employers, managers and trade union representatives. The aim is to strengthen workers' rights in the digital economy, **promote collective bargaining** on core working conditions, and **foster collaboration between social partners and public authorities.**

The Guidelines will contribute:

» For finding new ways, solutions and mechanisms for preparing the workforce potential regulatory pathways to strengthen workers' rights in the digital economy;

» The promotion of collective bargaining regarding core working conditions (e.g. wages, working time) in the context of algorithmic opacity;

» The effective exercise of individual and collective rights in contractually and geo-

graphically fragmented workplaces.

The national inputs to the *Guidelines* also underline the necessity for finding ways to counter or regulate the bargaining position of workers and employers at company level in the light of the new technologies and digitalisation and also the need for greater collaboration between **the Social Partners and the State** when implementing national and sectoral level policies and measures to ensure a fair use of digital technologies in the workplace.

BULGARIA

1. Applicable binding and non-binding national level initiatives for AI regulation

Bulgaria has adopted several strategic documents that encourage the digital transformation of the economy. The *Digital Decade Council* was established in 2022 as a body of the Council of Ministers for the overall coordination and cooperation of State policy in the field of digital transformation. In terms of AI, the most prominent document is the *Concept for the Development of Artificial Intelligence (AI) in Bulgaria by 2030.* As part of this *Concept*, it is envisaged that an Interdepartmental Working Group will be established, comprising representatives of key state institutions, regional administrations, the academic community, business and professional associations, as well as relevant non-governmental organisations. Its task will be to analyse the overall state of the sectors and to prepare an operational National Roadmap for the implementation of the *Concept.*

Amendments to the Labour Code in 2024 established a new legal framework for the application of information systems for algorithmic management in remote work. For the first time in Bulgarian labour legislation, new rights and obligations have been regulated when using information systems for algorithmic management in telework. The Labour Code guarantees employees the right to request a review of automated decisions made by an algorithmic management system that affect their rights. This is the so-called *Human-in-Control Principle* when decisions are made by an artificial intelligence system or an algorithmic management system. The employee must submit a written request to the employer or to a designated official for a review of the decision made by the algorithmic management system. The employee must be officially notified of the final decision – whether the decision of the algorithmic system is 'correct' or 'incorrect'.

Given the increasingly widespread use of information systems for organising and reporting work, the Labour Code, for the first time, also regulates an alternative option for actual working time to be recorded through an automated system. The law allows for human control and in this case the employer is obliged, upon request, to provide the remote employee with access to the data in the system concerning the working hours recorded.

The latest legal change regulating new rights arising from the use of AI systems or, more specifically, digital technologies is the establishment of a new right – the so-called "right to uninterrupted rest", also known as the "right to disconnect" – for the first time in Bulgarian labour legislation Article 154b of the Labour Code now regulates the right to uninterrupted rest, which grants employees the right not to respond to communication initiated by the employer during daily and weekly rest periods. Initiated communication is understood as any attempt to contact the employee through digital technology, such as telephone, e-mail, or mobile applications (Messenger, Viber, WhatsApp, SMS, etc.). If such communication is initiated by the employer, the employee is not obliged to respond and no sanctions for breach of labour discipline may be imposed. This creates the conditions for better work-life balance and reduced stress levels among employees.

2. The role of social dialogue in managing AI

National-level and sectoral social partners are actively involved in all legislative initiatives aimed at regulating the digital transformation of the economy and the deployment of AI. In 2022, the nationally representative organisations actively participated in bilateral negotiations initiated by the Minister of Labour and Social Policy to conclude a new bilateral agreement improving the norms and working conditions of remote workers in Bulgaria. Representatives of all nationally representative organisations of workers and employees and employers took part in the meetings. As a result, the above-mentioned 2024 Labour Code amendments on managing algorithms applied to remote workers were introduced. In addition to legislative initiatives, there are also numerous non-binding changes that can be found on the websites of the social partners' organisations.

Within Activity 9 of the CITUB project *Partnership in a Digital Environment*, a draft National Agreement between the national social partners has been developed for joint activities to implement the *Autonomous Framework Agreement on Digitalisation (2020)*. This Agreement covers four thematic areas, one of which is artificial intelligence and the *Human-in-Control Principle*. The Draft National Agreement on Digitalisation was presented at the 9th Congress of the Confederation of Independent Trade Unions in Bulgaria (CITUB) in May, 2022. It is currently under discussion with the national-level social partners.

In 2023 CITUB, together with the Bulgarian Industrial Association (BIA), prepared a National Report on the *Implementation of the European Framework Agreement on Digitalisation*. Developed within the framework of the EU-funded project TransFormWork (VS/2021/0014), this report examines specific aspects of digital transformation in the economy and social dialogue in Bulgaria. It clearly shows that the introduction and development of digital technologies and AI can be guided through the initiatives of the social partners.

3. National case studies on sectorial and/or company level

CASE STUDY 1

Title of Case Study: Change management team and digital training in Kamenitza brewery

Company/Organisation: Kamenitza AD

Number of employees impacted: not known

Organisations involved in negotiations and a 'good practice' agreement: The Change Management Team includes Kamenitza management, trade union representatives and qualified employees. The creation of such teams is envisaged under the sectoral agreement in the brewery industry and is supported by the company's social partners.

Description of type of AI to be introduced (or already introduced): not known

Training / retraining of staff / recruitment of new staff: Company-level social partners agree on the importance of developing digital skills among workers in the brewing industry. They also support the retention of qualified workers through worker adaptation and digital skills development. Employers undertake to provide training on digital technologies and to develop human-resources training related to AI and its use at the workplace. The employer thus demonstrates socially responsible behaviour when modernising and restructuring production operations.

Description of the action: Company-level social partners agreed on the need for digital-skills training provided to all employees. The Change Management Team is the recognised structure capable of implementing this policy decision. The Team informed workers about the reasons for company change, supported the internal information and communication system and promoted and supported the acquisition of digital skills. To support digital models in labour processes, social partners encouraged knowledge exchange on digital transformation. It should be noted that the Change Management Team is a structure supported by the so-called Parity Commission. Such commissions are created in unionised breweries and comprise management and union representatives. They maintain social dialogue and support human-capital development through training.

Outcome of negotiations / positive / negative experiences: A better-prepared workforce for digital transformation and AI deployment in the brewery sector; strengthened information and communication systems.

CASE STUDY 2

Title of Case Study: AI & I FACTORY (multi-company and university-supported initiative)

Company/Organisation: Digital National Alliance in collaboration with AI Cluster Bulgaria

Number of employees impacted: not estimated

Organisations involved in negotiations and a 'good practice' agreement: Sectoral organisations with the support of companies and universities

Description of type of AI to be introduced (or already introduced): Various aspects of AI

Training / retraining of staff / recruitment of new staff: educational seminars, workshops, hackathons, training camps and networking events

Description of the action: The main goal of the AI & I FACTORY is to deepen society's understanding of the key role and transformational potential of AI in everyday life. It aims to inspire experimentation in technology, while actively promoting inclusion and attracting more women and young talents to careers in technology and AI. The initiative serves as a hub where experts, scholars and budding talents from various fields gather. It should be noted that AI Cluster Bulgaria, which leads the AI & I FACTORY initiative, is active both nationally and internationally. It organises AI & I Hackathons and a 360-degree lab for AI aims to foster a sustainable ecosystem of AI-based start-ups and regularly publishes an Annual AI & ME (Microelectronics) Report mapping Bulgaria's AI ecosystem for stakeholders, policymakers and investors.

4. Key 'lessons' for managers and trade union representatives at the company level

> Inclusive, union-supported training programmes covering all employees are essential:

» Social dialogue at all levels is essential so that employees can be offered training programmes once AI tools are introduced at the workplace. Trade unions have proved to be reliable workers' representative structures in Bulgaria, insisting on inclusive training practices that encompass all employees regardless of background, abilities or learning styles, thereby enabling full participation and benefit from workplace training programmes. Among the most recent CITUB initiatives is the development of a training centre as an official provider of training in the key competence "Digital Skills". CITUB is providing completely free courses (via vouchers in the period 2023–2026) to members of its affiliates and to the general public

> Robust data-governance and staff training prevent AI-related privacy incidents:

» Training is also needed to prevent data leakage when using AI. Organisations worldwide are facing an unprecedented surge in AI related privacy and security incidents linked to data breaches caused by human-operated or human-controlled algorithmic failures. Such loss of sensitive information requires organisations to implement robust governance frameworks to protect personal data. To close the disturbing gap between risk awareness and concrete action, companies must train staff members who work with AI and invest in further safeguard measures.

> Sectoral clusters and parity commissions are effective structures for sustainable AI adoption: Overall company engagement with sustainable AI practices can be supported by sectoral organisations. A prominent example is the Spinoff Bulgaria

initiative, created by the Health and Life Sciences Cluster Bulgaria, the Artificial Intelligence Cluster Bulgaria, Venrize – Spinoff Factory and ISTEB. It aims to create a sustainable spin-off ecosystem and culture in Bulgaria and also across Europe, by connecting national stakeholders with international partners, presenting best practices, insights from universities, investors, governments, corporations and relevant industry experts, and funding opportunities from European organisations.

5. Useful links to address questions on AI deployment:

» Confederation of Independent Trade Unions in Bulgaria (CITUB) **/** www.knsb-bg.org

» CITUB Digital trainings website **/** www.knsb-learn.online

» Bulgarian Industrial Association **/** www.bia-bg.com

» Confederation for Employers and the Industrialists in Bulgaria **/** www.krib.bg

» Economic and Social Council of the Republic of Bulgaria **/** www.esc.bg

» AI Cluster Bulgaria **/** www.aicluster.bg

» INSAIT – Institute for Computer Science, Artificial Intelligence and Technology **/** www.insait.ai

» INSAIT (together with ETH Zurich and LatticeFlow AI) EU AI Act Compliance Evaluation Framework for Generative AI **/** www.insait.ai/compl-ai/#:~:text=The%20release%20includes%20the%20first%20mapping%20of%20the,AI%20models.%20Sofia%20%2F%20Zurich%2C%20October%2016%2C%202024.

» Professional Association of Robotics, Automation and Innovations **/** www.para.expert

» National Institute for Conciliation and Arbitration (sector level agreements available with open access) **/** www.nipa.bg

CYPRUS

1. Applicable binding and non-binding national level initiatives for AI regulation

Cyprus is actively adapting to European developments on artificial intelligence. Initiatives operate at two levels: nationally through strategies and working groups, and at EU level through the phased implementation of the AI Act.

In 2020, the Council of Ministers approved the National AI Strategy. The strategy sets the country's vision for skills development, the use of AI in public administration and support for businesses. It prioritises strengthening digital skills and training, promoting innovative business models, integrating AI in critical sectors such as health, education, energy and security, and ensuring its ethical and transparent use. Although not legally binding, it serves as a reference point and policy framework for Government, social partners and enterprises.

In 2025, a National AI Working Group was established to align the national strategy with EU developments and to submit recommendations to the Government. The group includes experts from the Deputy Ministry of Research, Innovation and Digital Policy, academics and representatives of social partners. Its remit covers assessing the impact of AI on the economy and employment, monitoring AI Act implementation and proposing support measures for businesses and workers.

At the binding-regulation level the AI Act creates a single legal framework across all EU Member States. By 2025, Cyprus must designate competent supervisory and enforcement authorities. It has already notified the European Commission that three national authorities – the Commissioner for Personal Data Protection, the Commissioner for Administration and Human Rights, and the Attorney General – will oversee compliance with the Regulation's fundamental-rights requirements. In parallel, the Commissioner of Electronic Communications will serve as the National Market Surveillance and Notification Authority and Single Point of Contact, while the Commissioner for Personal Data Protection will ensure compliance within her areas of competence. The Regulation imposes obligations on AI providers and deployers, with stricter rules for high-risk systems such as those used in recruitment, employee management and evaluation, or critical infrastructure.

Cyprus also participates in European and international initiatives. The *Digital Innovation Hub Cyprus* (DiGiNN) is an example of national and European cooperation. Co-funded by the EU, the hub operates as a one-stop shop for businesses and public bodies, providing integrated support for digital transformation. Through a structured service model, DiGiNN brings together leading national expertise in AI, high-performance computing, cybersecurity and other advanced digital technologies, with the participation of universities, centres of excellence and other organisations. Cypriot SMEs receive advisory services, training opportunities, access to infrastructure and "test-before-invest" services, enabling them to trial AI solutions, build know-how and connect to European networks and projects.

In addition, the Deputy Ministry of Digital Policy works to align AI applications with the General Data Protection Regulation (GDPR (EU) 2016/679*)* and the Regulation on the free flow of non-personal data ((EU) 2018/1807). Priority sectors for progress include public administration, education and financial services.

In summary, Cyprus follows a dual path: a) non-binding strategies and working groups setting policy direction; b) while binding EU frameworks establish enforceable rules. Together they create an environment in which businesses and workers understand both the obligations and the opportunities that come with AI use.

2. The role of social dialogue in managing AI

Introducing AI in enterprises is not only a technological matter but also a social and employment matter. Social dialogue – the cooperation of employers, trade unions and the state – is critical for the fair and responsible implementation of AI.

At European level, the social partners adopted a joint framework on digitalisation – the *Autonomous Framework Agreement on Digitalisation* (2020), which requires respect for human dignity, algorithmic transparency and clear human oversight of systems. European trade union organisations, such as industriAll Europe, stress that AI benefits workers only when it is accompanied by participatory processes and collective bargaining. They emphasise active worker involvement through their unions and appropriate training in the use of new technologies as essential conditions for AI to benefit workers.

In Cyprus, the topic has begun to engage unions and employer organisations. OEB and SEK have taken part in initiatives such as the EU project TransFormWork 2, which examines the impact of digital transformation and AI on industrial relations, while other social partners are engaging in projects that promote the exchange of good practices and the formulation of joint policy proposals.

Workers express concerns about privacy, monitoring, performance evaluation and job losses due to automation. Employers recognise that introducing AI without dialogue risks resistance. European experience shows that enterprises which involve unions from the outset achieve better results in adopting new technologies.

Social dialogue on AI in Cyprus is still at an early stage, yet the core priorities for the social partners are already clear:

» Transparency in the use of algorithms that affect workers (e.g. in hiring and evaluation).

» Protection of personal data and respect for privacy in the workplace.

» Continuous training and reskilling of staff so that new technologies do not create exclusion.

» Ensuring that AI supports people at work rather than replacing them.

3. National case studies on sectorial and/or company level

CASE STUDY 1

Title of Case Study: The Cyprus Institute – safety training with VR

Company/Organisation: The Cyprus Institute

Number of employees impacted: About 230

Organisations involved in negotiations and a 'good practice' agreement: Internal management and Safety Department structures

Description of type of AI to be introduced (or already introduced): No AI systems were introduced. The initiative focused exclusively on immersive virtual reality technology, used as a tool to modernise and strengthen workplace safety training.

Training / retraining of staff / recruitment of new staff:

Before each VR session, employees receive simple, clear instructions on the use of the headset, the controls and the scenario they will enter. Training takes place in small groups, ensuring that every participant has time to familiarise themselves with the equipment, ask questions and practise each scenario. The small-group format also allows the instructor to observe individual reactions and provide tailored guidance where needed. The sessions are designed so that employees actively engage instead of attending passively, and each group is encouraged to discuss the risks they encountered during the simulation. This repetition, combined with immediate feedback, makes the training more memorable and practical.

Description of the action:

The Cyprus Institute identified that previous safety seminars relied heavily on theoretical presentations. While informative, these sessions did not manage to capture employees' attention or provide hands-on experience. To address this limitation, the organisation introduced a VR-based training programme in 2025.

Through the VR headsets, employees enter a range of simulated work environments that realistically reproduce hazardous situations. These include '*working at a height', 'managing chemical materials', 'identifying unsafe storage'* and *'navigating an emergency evacuation caused by fire'*. In each simulation, employees are asked to recognise risks, make decisions, and understand the consequences of errors—all within a controlled, risk-free digital setting.

Outcome of negotiations / positive / negative experiences:

The implementation of the VR training programme led to several positive outcome, such as:

» Employees showed significantly higher interest in safety procedures compared to traditional seminar formats

» The interactive nature of the training made the learning process more enjoyable and easier to remember.

One notable change was the increase in hazard reports submitted to the Safety Department. This reflected a stronger prevention culture, as employees became more aware of risks and more confident in identifying unsafe situations.

Management also highlighted the very high participation rate with most employees voluntarily expressing an interest in repeating simulations to deepen their understanding. The VR programme proved that innovative tools could elevate safety awareness without requiring significant investment.

CASE STUDY 2

Title of Case Study: N. Psaras Construction Co Ltd – multilingual staff training with AI

Company/Organisation: N. Psaras Construction Co Ltd

Number of employees impacted: 172

Organisations involved in negotiations and a 'good practice' agreement: Internal management and Safety Department

Description of type of AI to be introduced (or already introduced): AI-supported video production using the *InVideo* AI platform, applied to develop a multilingual onboarding safety video.

Training / retraining of staff / recruitment of new staff: All new workers are required to watch the AI-generated safety video. After watching the material in their own language, employees complete a short comprehension test designed to verify that they understood the essential safety points. The Safety Department reviews the test results and provides additional explanation when needed. This approach ensures that every employee begins work fully informed and confident about the safety standards of the construction site.

Description of the action: The company faced a major challenge: its workforce includes employees from several countries, many of whom do not speak Greek. As a result, key safety instructions were often misunderstood, creating risks on site and reducing efficiency. Traditional training based on printed materials and in-person explanations required significant time and did not guarantee that each worker understood the information correctly. To solve this, the company used *InVideo AI* to create a clear and practical safety onboarding video. The AI tool allowed the material to be dubbed and subtitled into five languages—Greek, English, Turkish, Arabic and Romanian. The video includes the most important safety rules of the construction site, presented in short segments to make the content easy to follow and remember. This multilingual approach ensures consistency: every employee, regardless of nationality, hears the same message in a language they fully understand.

Outcome of negotiations / positive / negative experiences: The introduction of the AI-generated training video brought measurable results. Training time was reduced by around 70 %. Misunderstandings decreased substantially and the company avoided delays and fines linked to non-compliance. Workers reported that they felt safer and more confident, as instructions were presented in their own language. After implementation, the company did not record any serious accidents or violations related to communication problems. Cooperation with the main contractor improved

as well, since the new system demonstrated responsible safety management and innovation by the company.

CASE STUDY 3

Title of Case Study: AI and automation in the Cyprus banking sector

Company/Organisation: Major banking institutions in Cyprus

Number of employees impacted: Not disclosed

Organisations involved in negotiations and a 'good practice' agreement: Bank management structures and employees in discussions on digital transformation

Description of type of AI to be introduced (or already introduced): Banks introduced AI-driven tools for fraud detection, compliance checks, customer service automation and credit-related decision support. Additionally, digital systems were deployed to facilitate hybrid work.

Training / retraining of staff / recruitment of new staff: Banks have invested in programmes to help employees adjust to new technologies. Training focuses on digital literacy, data analysis and the correct use of automated systems. The purpose is to ensure that staff understand how to work with AI rather than be replaced by it.

Description of the action: The banking sector in Cyprus has moved increasingly toward digital transformation. Before automation, many banking processes relied heavily on manual work, paper-based procedures and face-to-face interactions. Fraud detection, compliance checks and data processing required large amounts of time and human resources. With the introduction of AI, banks now use automated systems to identify unusual patterns in transactions and flag potential fraud. AI chatbots and digital platforms handle common customer questions, provide faster responses and ensure continuous service availability. This shift gives employees more time to focus on complex tasks requiring human judgment. Furthermore, banks used digital systems to support hybrid working arrangements. Staff can perform administrative or analytical tasks remotely through secure digital platforms, achieving greater flexibility and helping maintain service continuity.

Outcome of negotiations / positive / negative experiences: AI tools have helped banks increase operational efficiency, speed up internal processes and offer faster customer service. Customers benefit from more digital channels, while employees gain more flexibility in their working arrangements. At the same time, the shift toward automation highlighted important considerations, particularly in data protection, human oversight and ensuring that technology is used responsibly. These challenges showed that digital transformation in the financial sector needs continuous monitoring and dialogue.

4. Key 'lessons' for managers and trade union representatives at the company level

» **Gradual AI deployment:** start with pilots to build employee acceptance

» **Focus on training:** ongoing upskilling and reskilling are essential to realise the

benefits of new technologies

» **Dialogue and participation:** early involvement of workers and their unions build trust and prevents conflict during AI introduction

» **Transparency and rights:** clear information on data and algorithms protects rights and builds trust

» **Evidence of benefits:** AI can reduce costs and risks, but adoption should be backed by clear evidence of benefits for employees.

5. Useful links to address questions on AI deployment

» Deputy Ministry of Research, Innovation and Digital Policy, Cyprus **/** www.dmrid.gov.cy **/** +357 22691927

» Office of the Commissioner for Personal Data Protection **/** www.dataprotection.gov.cy **/** +357 22818456

» Cyprus Employers and Industrialists Federation, OEB **/** www.oeb.org.cy **/** +357 22643000

» Cyprus Workers' Confederation, SEK **/** www.sek.org.cy **/** +357 22849849

» Pancyprian Federation of Labour, PEO **/** www.peo.org.cy **/** +357 22866400

» Pancyprian Public Employees Trade Union, PASYDY **/** www.pasydy.org **/** +357 22844444)

» Digital Innovation Hub Cyprus, DiGiNN **/** www.diginn.eu

» The Cyprus Institute **/** www.cyi.ac.cy **/** +357 22208600

» Regulation (EU) 2024/1689, AI Act, official text of the European Regulation on AI, all languages **/** digital-strategy.ec.europa.eu **/** www.cyprus-mail.com/2025/09/19/ai-and-automation-reshape-banking-and-hybrid-work-in-cyprus **/** www.cyprusinsider.cy/en/ai-and-automation-revolutionise-banking-and-work-in-cyprus/

IRELAND

1. Applicable binding and non-binding national level initiatives for AI regulation in Ireland

The Irish government has published a number of policy papers on how AI is to be implemented nationally, and – in the Public Sector – guidelines have now been developed for AI deployment in areas such as education and health services. The main policy document is "AI - Here for Good" which sets out a number of key strategic objectives and highlighted strategic actions which include:

» Ensuring Ireland is a leader in the effective implementation of the EU AI Act, including through constructive participation in the EU AI Board and its working groups and rolling out AI standards and certification

» Commissioning a landmark study on the potential impacts of AI (including generative AI) and other advanced technologies on key sectors of the Irish economy

» Developing a national campaign to raise awareness among SMEs of the benefits of AI adoption and the supports available

» Establishing an AI regulatory sandbox to foster innovation in AI

» Creating a National AI Research Nexus with a unified identity

» Continuing to develop high calibre AI talent through Research Ireland Centres

» Creating a safe space where civil and public servants are encouraged to experiment with AI tools

» Updating the 2022 study on AI skills of the Expert Group on Future Skills Needs, aligned to the targets set in the EU Digital Decade for skills and female participation

» Expanding the range of digital upskilling and reskilling initiatives, including those available via *Skillnet Ireland, Springboard*+, apprenticeships and future human capital initiatives

» Promoting increased use of and access to advanced AI computing services

» Supporting the establishment of infrastructure, including data centres, to underpin rollout of the next waves of AI technologies

A **National AI Advisory Council** was established in 2024. The Council consists of 14 members representing academia, business, law, security, social sciences, economics, and civil society. Members were selected based on their relevant experience and expertise in artificial intelligence and related areas. All members serve in a voluntary capacity, representing their individual expertise rather than specific organisations. The Council is designed to provide independent expert advice to the government on AI policy and related issues.

A new government took office in January, 2025, and appointed a Minister with specific responsibility for AI and Digital Transformation. The Government also set up a

Joint Oireachtas (parliamentary) Committee on Artificial Intelligence, which met for the first time in June, 2025.

The **Workplace Relations Commission** (WRC) in Ireland is responsible for promoting good workplace relations, ensuring compliance with employment laws and providing services such as mediation, conciliation and inspections. It also handles complaints related to employment rights and equality legislation.

The **Health and Safety Authority** (HSA) is responsible for enforcing workplace health and safety laws, ensuring compliance with safety regulations and providing information and advice to employers and employees. Both of these bodies have now been designated as competent authorities, responsible for implementing and enforcing relevant aspects of the AI Act within their respective jurisdictions.

2. The role of social dialogue in managing AI

Ireland has a long tradition of collective bargaining which dates back to the foundation of the Irish Congress of Trade Unions (ICTU) in 1894. The island of Ireland (i.e. the Republic of Ireland and Northern Ireland) has had its workers represented by only this single organisation up to the modern era. Ireland has had a tradition of a "voluntary model" of industrial relations. This refers to a system where the State provides a legal framework supporting industrial relations, but does not generally mandate that employers must engage in collective bargaining with trade unions. This means key aspects of the employment relationship are determined by agreement between the parties involved, rather than by a legal framework. The system is fundamentally based on the constitutional right of employees to form associations and trade unions, but also the right of employers to decide whether or not to recognise and negotiate with those unions. Therefore, there is no legal requirement under Irish law for an employer to recognise a trade union for the purpose of collective bargaining.
During the period 1987 to 2009 Ireland developed a model of "Social Partnership" which saw the emergence of centralised tripartite bargaining between national social partners and the State, supported by institutional frameworks and a process of on-going social dialogue on a wide range of socio-economic policy. The collapse of this model has left a fragmented industrial relations landscape, with bargaining now generally focussing on a narrower range of pay and conditions. The absence of a right to collective bargaining and the recognition of trade unions has become a contentious issue in recent years, with the Irish Government facing pressure to strengthen collective bargaining rights, partly in response to the EU Minimum Wage Directive ((EU) 2022/2041). The Government launched an *Action Plan to Promote Collective Bargaining 2026–2030* aimed at raising bargaining coverage, though it intends to keep the underlying voluntary model intact. This plan has been met with mixed reactions, with unions broadly welcoming the initiative but criticising the lack of enforcement mechanisms.

The Labour Employer Economic Forum (LEEF) is now the primary structure for tripartite dialogue in Ireland, bringing together representatives from the Government, employers, and trade unions to discuss economic, employment, and labour market issues. It is a high-level non-binding consultative group, rather than a bargaining

forum. ICTU has raised its concerns about elements of AI through the LEEF and conveyed its support for an approach to AI implementation that is based on consultation and regulation, while employers and the Government prefer guidance, existing data protection laws, such as the General Data Protection Regulation (GDPR (EU) 2016/679) and the EU AI Act Regulation ((EU) 2024/1689) to set baseline standards. While this broad dialogue has taken place through LEEF, there has been very little engagement at company or sectoral level between employers and unions. A number of national studies and surveys, included research conducted for this project, have all pointed to a lack of consultation with staff and a lack of information among workers about how AI might be introduced and effect their work.

3. National case studies on sectorial and/or company level

Title of Case Study: AI Agreement between the Bank of Ireland Group and FSU

Company/Organisation: The Bank of Ireland (BoI) is one of the main commercial banks in Ireland. It was established in 1783 by an act of the Irish Parliament and as the country's first central bank. Following the Act of Union in 1801, which abolished the Irish Parliament, the bank bought the former Parliament House on College Green, Dublin, in 1808 and set up a branch network across Ireland. It was appointed the Government's banker in 1922. Throughout its history, it has grown through acquisitions, including the Hibernian Bank in 1958 and the Bristol and West Building Society in Great Britain in 1997. The bank employs an estimated employs an estimated 11,000 employees.

The Financial Services Union (FSU) is the leading trade union representing staff in the Financial Services, Fintech and Tech sectors, with an estimated membership of 12,000. Originally called the Irish Bank Officials' Association (IBOA), it has represented workers in the financial services sector throughout the island of Ireland since its foundation in 1918. With the expansion of their operations the two major Irish banks (Bank of Ireland and Allied Irish Bank) into Great Britain in the 1960s, IBOA became a trade union operating in three jurisdictions – Republic of Ireland, Northern Ireland and Great Britain. In addition, with the establishment of the Financial Services Centre in Dublin Docklands, many international financial organisations have established offices in Ireland and FSU has expended its membership into these new arrivals. Key issues from its early representation of members - such as on pay, pensions, stress, bullying and harassment – are still of crucial concern for workers in financial services employment. Reflecting the rapidly changing nature of the sector, the IBOA was renamed the Finance Union in 2007 - before becoming the Financial Services Union in 2016.

Number of employees impacted: It is not known precisely how many employees are covered by the agreement but it is likely to be up to 6,000.

Agreement of Artificial Intelligence

This Agreement is the first such initiative to take place in the retail banking sector in Ireland. It is seen as a breakthrough for the sector on how the introduction and use of AI will be monitored and regulated jointly by the bank and the union. It ensures

that any changes to the roles and responsibilities of staff will be subject to rigid procedures. The agreement introduces a human-centred approach to the use of AI, so the impact of AI will be negotiated through the well-established collective bargaining procedures. Training and reskilling will be prioritised by the Bank.

Description of type of AI to be introduced (or already introduced)

The agreement is *framework* in nature and, therefore, sets out general principles rather than specifying the particular forms of AI that may emerge in the future.

General Principles:

The Agreement will assist the BoI and the FSU to provide a framework for the introduction and usage of AI over the coming years in a way that is beneficial for the BoI Group, its shareholders, its customers and that best protects its staff. With the introduction of AI systems and other forms of digital transformation, humans will be at the centre of work organisation, with full respect for the *Human-in-Control* principle.

Definition: In this agreement, AI is understood to mean:

> *... a machine-based system designed to operate with varying levels of autonomy that may exhibit adaptiveness after deployment and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs, such as predictions, content, recommendations, or decisions that can influence physical or virtual environments, in keeping with the AI Act Regulation.* [5]

AI systems can be recognised principally, though not exhaustively, by three main features:

» They are independent, thus able to perform tasks and make decisions without human direction

» They are self-learning, able to teach themselves and continuously improve

» They have access to large volumes of data, from which they can learn on their own.

Staff surveillance: The use of AI for surveillance or to monitor employees should be limited, transparent, proportional, in compliance with existing collective agreements, international and national laws. In all cases, decisions relating to the use and analysis of these tools have to be made by staff members.

Employees have the right *not* to be subject to decisions that affect them significantly (or impact on their legal rights), based solely and exclusively on automated variables. The BoI, together with all relevant employees, must abide by and respect the applicable legal provisions outlined, for example, by the GDPR Directive and the AI Act Regulation, as well as national legislation, ethical policies / banking regulations, confidentiality and security clauses issued by the BoI.

This agreement encourages dialogue between the parties, in line with existing practices and agreements, in order to develop and put in place joint actions to support job transition and ensure re-skilling and up-skilling opportunities, when jobs are af-

fected by the growing use of AI and other digital technologies. The continuous upskilling of employees, who use these new technologies, should be built into talent management.

Training / retraining of staff / recruitment of new staff:

Training for AI: While AI will continue to evolve, both the BoI and FSU remain committed to the existing change management procedures. In terms of training, the BoI will provide the necessary training, during working hours, for employees to adapt to the new technologies. For upskilling/reskilling and career guidance, employers and employees are encouraged to carry out training, where possible.

The BoI and the FSU will communicate the importance of training and competence development to employees and to union members. Appropriate retraining, with an emphasis on acquiring new skills needed for the digital era and adapting to new working realities, should be one of the priorities to be jointly addressed by the bank and the FSU.

Collective training plans should also include actions to help bridge the digital divide and enhance bank employees' employability and employment prospects. This is a long-term job security measure. The BoI has already commenced working to support employees in ensuring they are future-proofing their skills.

The BoI reaffirms its commitment to job security and existing change management agreements with FSU. These agreements will be updated with a note referencing the new AI agreement. It is agreed by both parties that, in order to assist with this commitment to job security, all employees will need to be flexible regarding redeployment. If an employee refuses to accept a reasonable alternative role this will be managed in line with the existing change management agreement.

Should either party wish to dissolve the terms of this agreement, they shall notify the other with a minimum notice period of six months. In the case that disagreement arises regarding the dissolution of the scheme, both parties agree to follow the existing dispute resolution process.

4. Key 'lessons' for managers and trade union representatives at the company level

The role of social dialogue in the AI context faces several challenges in Ireland. Not least of these is the absence of a right to collective bargaining as outlined earlier.

Social partners agree on the need for capacity, expertise and resources to engage meaningfully on AI issues. AI developments and deployment can happen swiftly, whereas social dialogue processes can be slower, which means there is a risk of engagements lagging behind real workplace change. Many managers are cautious about AI due to the complexity and potential risks of integrating new technologies into outdated existing systems.

In Ireland, while there are national strategies, advisory councils and guidelines, the direct linkage between social dialogue mechanisms and AI regulatory design have

not yet been established. Even the national advisory body for AI is expert-driven rather than a classic social dialogue forum. However, translating it into concrete agreements, collective bargaining outcomes, or enforceable frameworks is the harder part. There is a lack of awareness about social dialogue and engagement on artificial intelligence among employers in the sector, despite agreements reached at the EU level. Employers have historically been reluctant to engage in collective bargaining, often using a veto system to avoid negotiations.

The focus on training and reskilling is seen as important by both sides. This reflects a broader national consensus that training for both managers and workers needs to be resourced and accelerated. However, while unions emphasise the importance of regular information and consultation with employers regarding AI implementation and, as no single agreement can cover all potential scenarios, so ongoing discussions are necessary. AI should become a regular point of discussion in the same way as other workplace issues.

5. Useful links to address questions on AI deployment

» SIPTU - Services Industrial Professional and Technical Union **/** www.siptu.ie

» Irish Congress of Trade Unions (ICTU) **/** www.ictu.ie

» Irish Business and Employers Confederation (Ibec) **/** www.ibec.ie

» AI Advisory Council **/** www.gov.ie/en/department-of-enterprise-tourism-and-employment/campaigns/artificial-intelligence-ai-advisory-council

» Ireland's National AI Strategy **/** www.enterprise.gov.ie/en/publications/national-ai-strategy.html

» Expert Group on Future Skills Needs **/** www.skillsireland.ie

» Financial Services Union **/** www.fsunion.org/latest/news/fsu-and-bank-of-ireland-launch-ai-agreement

ITALY

1. Applicable binding and non-binding national-level initiatives for AI regulation

The Italian artificial intelligence (AI) market is growing significantly, though it still lags behind other European countries. According to official ISTAT data (Enterprises and ICT 2024), only 8.2% of enterprises with at least ten employees use AI tools, compared to an EU average of 13.5%. The AI market remains heavily concentrated in larger companies (90%).

The current legal framework is predominantly multilevel in nature. It has evolved through amendments specifically targeting technological aspects, alongside national legislation designed to effectively implement EU Directives and Regulations.

Law 300/1970 (Workers' Statute) remains a cornerstone, as it restricts audiovisual surveillance and other technological controls in the workplace. Such measures may be used exclusively for organisational and production needs, worker safety, or the protection of company assets and only after reaching a collective agreement with unitary trade union representations or company-level trade union representatives.[1] Article 8 of this legislation expressly prohibits employers from investigating or collecting information unrelated to work performance.

Legislative Decree 25/2007, which implements EU Directive 2002/14/EC establishing a general framework for informing and consulting employees in the EU, requires that workers or their representatives are properly informed about the introduction, functioning, objectives, or modification of any AI systems.

Legislative Decree 152/1997[2] regulates information obligations concerning the use of automated decision-making and monitoring systems, particularly those employed in recruitment, job assignment, management, or termination of employment relationships.

Under recent legislation (Law 132/2025), companies using AI systems in personnel management must provide clear and comprehensive information to workers and trade union representatives about how the algorithms function (Article 11). Any significant change must be notified at least 24 hours in advance and the information must also be shared with company trade union representatives or with higher-level, comparatively more representative trade union bodies. Failure to provide complete information triggers a fine for each affected worker, with higher penalties when trade union representatives are involved. The law enshrines the fundamental principle that AI used in work organisation and management must never result in discrimination and must always include effective human oversight. What matters is not the intention behind the system, but the objective effects of automated decisions.

1 Article 4, as amended by Legislative Decree 151/2015 – Jobs Act, Article 23

2 As amended by Decree-Law 104/2022 – the "Transparency Decree" – and subsequently by Decree-Law 48/2023

2. The role of social dialogue in managing AI

At present, Italian social partners at all levels regard digitalisation, AI and algorithmic management as priority issues in their organisational strategies and industrial relations agendas.

Various employers' associations, for example:

» **Confindustria** – The largest and most influential organisation in the private sector, particularly in manufacturing – states that *AI must not become a battleground or source of conflict between the social partners [...], avoiding the risk that traditional concertation models in national sectoral contracts and industrial relations obstruct the development of AI by turning it into a point of contention.*

» **Federmeccanica** – Representing the metalworking and mechatronics sectors, calls for a 'cultural renewal' since - *it is no longer possible to manage the Fourth Industrial Revolution with the old tools of Fordism and its standardised, sectoral or inter-sectoral industrial relations*

» **Confcommercio** – The employers' association for the tertiary and service sectors with the largest membership, stresses the need for an 'anthropocentric' approach and supports the involvement of social partners in establishing an Observatory on the adoption of AI systems, while promoting training for both workers and employers.

Among the major trade union confederations, CGIL – the largest by membership – has promoted, since its 2018 Programme Conference, the slogan *let's negotiate the algorithm*, emphasising that algorithms are neither neutral nor beyond social and trade union negotiation. This approach first requires the renewal of bargaining instruments *according to a logic of general and inclusive representation of work, combined with stronger protection of specific situations*, because the current model *is unable to cover the full range of social and labour needs without mixing levels, actors, counterparts and promoters.*

CISL, the second-largest confederation, places strong emphasis on the opportunities offered by digital innovation, including through company-level bargaining and greater worker participation in organisational matters. Nevertheless, a recent CISL document notes that *AI could increase the asymmetry between employers and employees, an imbalance that must be addressed by strengthening participation rights [...] and finally implementing the 2020 European framework agreement*.

It must be clear that algorithmic decisions remain the direct responsibility of the employer and management, who bear the legal consequences of any discriminatory, non-transparent, or unfair practices.

UIL, the third-largest union, regards social dialogue and participatory governance as essential tools for monitoring and mitigating the potential negative effects of new technologies on rights, productivity and employment. In a recent parliamentary hearing, UIL proposed following the French government's example of September 2023 by creating an AI committee that grants social partners an active and participatory role in developing joint proposals, including experimental tests.

Currently, all national industry-wide collective agreements (NCLA) regulate remote working on a voluntary basis and include the right to disconnect. The 2023 NCLA for the chemical-pharmaceutical sector contains a dedicated chapter with guidelines to support investment in digital innovation and manage organisational change. Also in 2023, the banking sector NCLA established a joint bilateral national committee ("cabina di regia") to address the impact of new technologies and digitalisation.

The 2024 NCLA for commercial agents ("shoppers") imposes an obligation on clients to inform agents and trade unions about the use of automated decision-making systems that produce relevant effects, with the possibility of opening discussions on the matter. The 2025 telecommunications NCLA provides training courses to raise workers' awareness of data generated by AI models in order to assess service quality levels for customers and it recognises workers' right to appoint a specialised delegate for data management.

At company level, the number of collective agreements containing explicit clauses on AI remain limited. In the sample of 1,400 agreements examined in the 4th Report on Decentralised Collective Bargaining published by CGIL and FDV (September 2024), explicit references to AI systems are rare. However, the situation is evolving rapidly. For example, links between AI, data protection and health and safety issues are frequently found in company agreements in the energy sector. Some agreements (ENEL, Wind, Tim) govern the consensual introduction of software that could enable remote control or intrusion into workers' activities. In logistics (Fedex), geolocation systems may not be used to pressure employees into faster performance or to continuously monitor driving routes. Another example is in a call-centre software company (Afiniti), where an agreement regulates the use of AI that matches the supposedly best-suited operator with an already-profiled customer. Isolated experiments have also addressed AI applications, such as autonomous vehicles, autonomous robots, smart objects, virtual assistants and chatbots and intelligent processing of data, images, and language.

3. National case studies at sectoral and/or company level

Title of Case Study: Monitoring the impact of AI from the earliest experimental stages in the media and digital publishing sector

Company / Organisation: A big company in the media sector. Founded in 2016, it is one of Italy's largest internet companies. It provides a range of digital products and services for professionals, SMEs and large enterprises, including website and e-commerce development, social media management, online advertising and business directory services, with a primary focus on online communication. Its main offices are located in Milan, Turin, Pisa, and Rome.

Number of employees affected: Approximately 200.

Organisations involved in negotiations and the 'good practice' agreement: Trade unions and the employer.

Description: In early 2025, the company signed a memorandum of understanding

with the trade unions on the ethical management of systems, processes and information derived from the use of AI. The agreement establishes a joint "monitoring committee" composed of company and trade union representatives that meet every three months to track the development of AI systems, assess their impact on workers and analyse effects on professional skills and competences.

Type of AI introduced or planned: At present, AI is used only in experimental processes and mainly for routine tasks. It is employed to moderate social media pages (initial screening of comments in discussion threads to filter out offences and insults) and to rapidly identify the most relevant comments worthy of a response among hundreds posted on an article. AI is also used to build websites, thereby partially replacing or supplementing tasks currently performed in-house. In the near future, it may be applied to commercial activities, for example to profile customers and their service needs, with potential consequences for employment in sales and customer relations roles.

Training / retraining of staff / recruitment of new staff: The protocol includes training programmes designed to upgrade workers' professional skills so they can interact more effectively with AI and potentially to facilitate the redeployment of employees currently performing routine tasks that may soon be automated.

Description of the action: The AI implementation process remains in an experimental and evolving phase. No significant restructuring has occurred yet, but further AI development could, even in the short term, put many jobs at risk, especially in routine activities such as social media comment management.

As with other parts of the publishing industry, this sector has already experienced profound technological and digital transformation in recent years, resulting in major changes to work organisation, substantial restructuring, staff reductions and increased precariousness.

Notably, the ability to perform certain tasks with AI is enabling the re-internalisation of activities previously outsourced. This leads to an overall net loss of jobs, but simultaneously triggers a re-insourcing of certain company functions. In any event, AI experimentation in online communication appears to be advancing more rapidly than in traditional print-media newsrooms, often with less caution on the company side and therefore greater risks for workers.

It is therefore crucial that, from the outset, a foundation is laid for continuous joint monitoring (e.g. every three months) of the impact of new experimental processes on workers' skills, with particular attention to training and professional retraining programmes.

At this stage, however, it is still too early to evaluate the positive or negative effects of the agreement.

4. Key 'lessons' for managers and trade union representatives at the company level

» Start monitoring and joint discussion as early as possible – ideally from the very first experimental or pilot phase of AI introduction – rather than waiting for full-scale

deployment or the first negative effects on employment or working conditions

» Create permanent, regular joint bodies (e.g. monitoring committees, bilateral observatories, or *cabine di regia)* that meet at fixed intervals (quarterly or half-yearly) to assess the real impact of AI systems on jobs, skills, working conditions, and possible discriminatory effects

» Make transparency non-negotiable: workers and their representatives must receive clear, comprehensible and timely information on how algorithms function:

a) what data they use;

b) what decisions they influence or automate;

c) what criteria are applied (including at least 24 hours' notice before significant changes, as now required by Law 132/2025)

Explicitly recognise in writing that the employer remains fully responsible for the outcomes of algorithmic decisions - AI does not reduce legal liability for discrimination, unfair treatment, or breaches of privacy and dignity at work

» Link the introduction of AI to active training and reskilling policies from the outset, so that workers whose tasks are automated or downgraded can be redeployed internally rather than simply made redundant

» Use company-level agreements to set precise limits on intrusive technologies (for example: a) remote control software; b) continuous geolocation; c) behavioural scoring; d) emotion recognition, etc.) and prohibit their use for disciplinary pressure or individual performance ranking unless jointly agreed

» Treat *re-internalisation* made possible by AI as an opportunity for negotiated *re-insourcing* clauses that protect overall employment levels and prevent a net loss of jobs when previously outsourced activities are brought back in-house.

5. Useful links to address questions on AI deployment:

» Fondazione Di Vittorio (FDV) **/** www.fondazionedivittorio.it

» Confederazione Generale Italiana del Lavoro (CGIL) **/** www.cgil.it

» Confederazione Italiana Sindacati dei Lavoratori (CISL) **/** www.cisl.it

» Unione Italiana del Lavoro (UIL) **/** www.uil.it

» Sindacato Lavoratori della Comunicazione (SLC) **/** www.cgil.it/la-cgil/sindacati-di-categoria/slc-cgil-sindacato-lavoratori-della-comunicazione-vxbpqcio

» Federazione Lavoratori della Conoscenza (FLC) **/** www.cgil.it/la-cgil/sindacati-di-categoria/flc-cgil-federazione-lavoratori-della-conoscenza-bymmhz28

» Federazione Impiegati Operai Metalmeccanici (FIOM) **/** www.cgil.it/la-cgil/sindacati-di-categoria/fiom-cgil-federazione-impiegati-e-operai-metallurgici-p49bs1df

» Federazione Italiana Sindacale Assicurazione e Credito (FISAC) **/** www.cgil.it/la-cgil/sindacati-di-categoria/fisac-cgil-federazione-italiana-sindacale-lavoratori-assicurazioni-e-credito-wf13vnnn

» Confindustria **/** www.confindustria.it

» Federmeccanica **/** www.federmeccanica.it

» Associazione Bancaria Italiana (ABI) **/** www.abi.it

» Confindustria Cultura Italia **/** www.confindustriaculturaitalia.it

» Ministero dell'Istruzione **/** www.mim.gov.it/-/intelligenza-artificiale-al-via-la-sperimentazione-nelle-scuole,

» Osservatorio IA Politecnico Milano **/** www.polimi.it/ricerca/polimi-ai/osservatorio-ai

» Associazione Regolazione Intelligenza Artificiale (AIRIA) **/** www.airia.it

MALTA

1. Applicable binding and non-binding national level initiatives for AI regulation

Malta has established itself as a proactive player in the regulation and strategic deployment of AI. The country's approach combines binding legal frameworks with non-binding strategic initiatives aimed at fostering innovation while safeguarding ethical standards and labour rights.

Malta's primary approach to AI governance is outlined in the *National AI Strategy 2030*, launched in 2019. This strategy rests on three main pillars – investment and a) innovation; b) public-sector adoption and c) private-sector adoption – supported by horizontal enablers, such as education, legal and ethical frameworks, and infrastructure.

The strategy promotes workforce reskilling, integration of AI into educational systems and the creation of ethical guidelines. It also stresses the importance of establishing a think tank to identify jobs at risk and to develop transition plans. The Malta Digital Innovation Authority (MDIA) is currently developing a new policy designed to be updated continuously, thereby ensuring that national policies remain aligned with the latest developments.

Regarding binding regulation, Malta is aligning its national legislation with the EU AI Act, which classifies AI systems used in human resources and surveillance as "high-risk". The MDIA is updating its legislative framework to ensure compliance with EU standards. A draft bill amending the *Malta Digital Innovation Act* is currently before Parliament, aiming to grant the MDIA regulatory authority over AI technologies. Additionally, Legal Notice 268 of 2022 under the Employment and Industrial Relations Act defines algorithmic management and mandates transparency in digital labour platforms. Employers are required to disclose the parameters used in automated decision-making and to monitor their impact on workers.

Non-binding initiatives include the *Trustworthy AI Strategy*, which articulates four ethical principles: a) human autonomy; b) prevention of harm; c) fairness; and d) explicability. Sectoral strategies also facilitate AI integration. For example, the *Digital Education Strategy 2024–2030* aims to promote AI literacy from primary education onwards, while the *National Health Systems Strategy 2023–2030* emphasises AI's importance in diagnostics and patient care. The *Financial Services Strategy* supports AI adoption in FinTech and RegTech sectors, highlighting transparency and client safeguarding.

2. The role of social dialogue in managing AI

The Malta Council for Economic and Social Development (MCESD) functions as the main tripartite forum for dialogue among government, employers and trade unions. AI has frequently been discussed at MCESD meetings, where stakeholders debate its economic and social impacts. The Council has called for readiness and cooperation

to ensure Malta remains competitive and socially resilient.

Trade unions, particularly the General Workers' Union (GWU), have expressed concerns about AI's effects on job security, surveillance and digital literacy. The GWU advocates inclusive training, ethical AI governance and transparent communication. It also emphasises the importance of human oversight and stresses that low-skilled workers should not be excluded from AI-driven changes.

Employer organisations such as the *Malta Chamber of Commerce* and the *Malta Business Bureau* support AI as a tool for increasing productivity and encouraging innovation. They promote public-private collaborations and fiscal incentives to foster responsible AI use, especially among small and medium-sized enterprises.

The National Report from TransFormWork 2 highlights a notable gap in social dialogue within the private sector. Many companies lack trade union representation and internal systems for employee consultation. This restricts workers' influence over AI decisions and raises transparency and accountability issues. Some sectors, including education and healthcare, are beginning to incorporate AI-related clauses into collective agreements, covering professional development, ethical standards and transparency in AI implementation. An agreement in the manufacturing sector is also aimed at reskilling workers for roles involving AI.

3. National case studies on sectorial and/or company level

Title of Case Study: Adoption of AI in the financial sector

Company/Organisation: A leading Maltese Consultancy and audit company

Number of employees impacted: The company employs 180 people across audit and consultation services specialising in taxation.

Organisations involved in negotiations and a 'good practice' agreement: There is no employee representative or collective bargaining in this company and trade unions are not recognised as employees' representative. Union membership in Malta's private sector has been declining steadily, reflecting broader global trends and raising concerns about the future of collective representation. According to a 2009 study, only about one in four full-time private sector workers was covered by a collective agreement, a significant decrease from one in three just over a decade earlier. The 2015 study confirms these findings. It indicates that only 22% of private sector employees are unionised, compared to 55% in the public sector. Union membership is notably higher among older workers, those with tertiary education and employees in larger organisations. Conversely, younger workers, those on fixed or part-time contracts and employees in small firms are much less likely to be union members. Occupational differences also influence unionisation: professionals and technicians are more likely to be unionised than elementary or agricultural workers.

Description of type of AI to be introduced (or already introduced): The company provided all employees with a Microsoft Copilot licence and this tool is accessible

on their work accounts and linked to all Microsoft applications. Regarding the audit, the company is in the process of integrating AI into the audit systems used by employees, which will streamline their work, including searching for information within work-related documents and automating certain tasks.

Training / retraining of staff / recruitment of new staff: The organisation provided compulsory training to all employees issued with a Microsoft licence. In the consultation and taxation department, the training included notes, online videos and a mandatory test. Rather than concentrating on the technical aspects of AI, this training focused on the principles to follow when using AI. Based on the assessment, the company then issued a written policy on AI usage. The policy emphasises that AI is there to support employees in their daily work, but the final output must be reviewed and approved by the employee. For example, reliance on AI is not advised when reviewing case law. Additionally, when preparing consultation documents and feedback, human review is essential, particularly since AI might include feedback from a competing company in any draft.

Key issues for social partners: Through AI, employees gain an extra tool that helps them streamline their work, save time and boost productivity. Furthermore, it is anticipated that integrating AI into their audit system will further enhance the work process.

Range of negotiations: The AI system was introduced through a top-down decision by management, without prior discussions with employees or trade union representatives, as there is no existing union or employee representative structure. Its primary purpose is to support, not replace, employees in their daily tasks, especially in a sector with a tight labour market where retaining staff is essential. This strategy emphasises operational efficiency and support rather than workforce downsizing or restructuring.

Costing of agreed actions: The introduction of AI required a significant investment from the company since licensing for each employee is very costly. Moreover, the company is also aiming to adopt AI in other tools already used by employees, which will automate and simplify certain tasks. A dedicated team is working on the adoption of AI to oversee its implementation and provide support to employees.

Outcome of negotiations / positive / negative experiences: The AI system was introduced without prior consultation with employees or trade unions, which do not exist in the organisation. It is in the early stages of deployment, so its overall impact on the workforce cannot yet be assessed. Although designed to support, not replace, employees, its long-term effects on jobs, workflows, and satisfaction remain uncertain. Ongoing monitoring is essential to fully understand its implications.

4. Key ‘lessons’ for managers and trade union representatives at the company level

The introduction of AI in a company with 180 professionals in audit and taxation services offers several important lessons, although the lack of trade union representation or employee consultation highlights a significant gap in social dialogue. While the AI system (Microsoft Copilot) represents a substantial investment aimed

at increasing productivity – especially in a sector facing tight labour markets – AI can help reduce workloads and improve efficiency. However, training and employee feedback remain crucial. Early involvement of staff through training and assessment helped foster acceptance and ensured ethical and responsible use of AI. The company's approach – emphasising principles rather than technical details in training and requiring human review of AI-generated outputs in a written policy – are positive steps towards reducing the risks of over-reliance and maintaining high work standards.

The main point is that adopting AI requires proactive communication, clear policies and inclusive practices. These elements are vital for balancing technological progress with employee well-being and creating a sustainable, future-proof workplace.

5. Useful links to address questions on AI deployment

Malta Digital Innovation Authority (MDIA)
Role: Regulates and promotes ethical AI adoption, supports compliance with the EU AI Act, and provides certification and funding for AI projects.
www.mdia.gov.mt **/** info@mdia.gov.mt **/** +356 2599 2200

Ministry for the Economy, European Funds and Lands
Role: Oversees national economic policy including digital transformation and innovation strategies.
www.economy.gov.mt **/** nfo.economy@gov.mt

Malta Chamber of Commerce, Enterprise and Industry
Role: Represents businesses
www.maltachamber.org.mt **/** +356 22032000 **/** info@maltachamber.org.mt

General Workers Union (GWU)
Role: Advocates for workers' rights, promotes ethical AI use, and supports upskilling and reskilling initiatives.
www.gwu.org.mt **/** +356 25679000 **/** info@gwu.org.mt

Malta Business Bureau (MBB)
Role: Facilitates EU policy engagement
www.mbb.org.mt **/** +356 2125 1719 **/** nfo@mbb.org.mt

Faculty of Information & Communication Technology – University of Malta
Role: Academic and research centre for AI, computer science, and emerging technologies.
www.um.edu.mt/ict **/** +356 2340 2530 **/** ict@um.edu.mt

Institute of Information and Communication Technology – MCAST
Role: Vocational and academic training in ICT and AI-related disciplines.
www.iict.mcast.edu.mt **/** +3562398 7350 **/** ict@mcast.edu.mt

POLAND

1. Applicable binding and non-binding national level initiatives for AI regulation

Trade unions took action relatively early to encourage the authorities to introduce regulations protecting workers from abuses resulting from the use of AI. As early as 2022, they began cooperating with the *Parliamentary Committee on Digitalisation, Innovation and Modern Technologies*. As a result of this cooperation, the Committee drafted a bill amending the Trade Unions Act, which was submitted to the Marshal of the Sejm (Parliament) on 15 September 2022.

The draft law contains additional provisions expanding trade union rights, including Article 28, stating that the employer is obliged – at the request of a company trade union organisation – to provide information concerning *the parameters, rules and instructions on which algorithms or artificial intelligence systems are based...* This refers to algorithms or AI systems that affect *working and pay conditions, access to employment and its maintenance, including profiling.* The above solution was modelled on provisions introduced in Spain in 2023. This amendment had not yet been adopted (as of February 2026).

In addition, both trade unions and employers' organisations have been involved in the consultation process for the draft law on AI systems, which constitutes the national implementation of the EU AI Act Regulation ((EU) 2024/1689). According to Norbert Kusiak of the OPZZ trade union,

> *The adoption of the AI Act provided trade unions with another strong argument in this discussion. Artificial intelligence systems should be fully transparent, which means, among other things, an obligation to inform users about the rules governing their operation and the influence they have on decision-making processes. Under the AI Act, it is also necessary to ensure that employees and their representatives have access to information about the planned deployment of high-risk AI systems in the workplace. ... regrets that the regulation does not provide detailed rules governing relations between employers and trade union organisations.*

Moreover, one of the largest trade unions, NSZZ Solidarność, carried out a joint analytical project with the employers' organisation Polish Confederation Lewiatan. The objective was to develop a National Action Plan for implementing the *European Social Partners' Framework Agreement on Digitalisation (2020)* in Poland. This agreement also includes provisions concerning AI, in particular the *Human-in-Control Principle* over AI systems. However, the two organisations did not reach agreement on a National Plan.

2. The role of social dialogue in managing AI

The social partners have not yet launched a special forum for dialogue on AI issues. They could potentially do so within the *Social Dialogue Council*, a tripartite body that brings together the three representative trade union confederations and seven representative employers' organisations.

Interviews conducted as part of the TransFormWork 2 project show that the issue of AI has not been introduced into the content of collective agreements, either at industry level or at company level. This is due, among other reasons, to well-established tradition, for example, where collective agreements are concluded, they mainly concern wages, severance pay in the event of layoffs and working conditions.

Moreover, collective labour agreements cover only a small proportion of Polish employees. A significant number of employees are forced to work under civil-law contracts (B2B), as collective agreements are only concluded at enterprise level and, even these are only in a small percentage of enterprises. In total, all forms of collective agreement cover less than 20 % of employees (Czarzęsty 2023: 33). Industry-level agreements are practically non-existent.

It can be assumed that dialogue around AI does take place, but informally. Leaders of trade unions and employers' organisations maintain numerous contacts with each other, during which they define the limits of what is possible for potential future agreements. Formal agreements are difficult to conclude for many reasons, both structurally and culturally. Structurally, the *Social Dialogue Council* comprises three trade union confederations and seven employers' organisations, which complicates communication. Partners often prefer to pursue their objective at parliamentary level, by lobbying for specific regulations – as happened in this case. Culturally, relations between interest groups remain confrontational.

3. National case studies on sectoral and/or company level

Title of Case Study: Issues of production modernisation and AI

Company/Organisation: Kompania Piwowarska SA / Brewing Group (part of Asahi Europe & International)

Number of employees impacted: 2 700

Organisations involved: Company-level trade unions

Description of type of AI to be introduced (or already introduced): Automated high-bay warehouse

Training / retraining of staff / recruitment of new staff: After laying off approximately 55 workers, the company plans to hire several specialists in automation and programming.

Description of the action

Trade unions generally participate in dialogue with the employer on the consequences of introducing new technologies into production, including AI systems. Conversations tend to revolve around necessary downsizing and the severance pay that the company can offer to departing employees. Trade unions do not usually challenge plans to introduce new technologies, considering them a result of technological progress.

Negotiations focused on severance pay for employees who are to be made redundant. Relations with trade unions are such that the employer usually offers higher severance pay than required by the Labour Code. The company's collective labour agreement has no provisions requiring negotiation when the employer plans to in-

troduce new technologies and such negotiations do not take place. However, trade unions find out informally about plans to introduce new technologies, especially when the employer intends to carry out collective redundancies (more than 10 % of the workforce). Until recently, such a situation had not arisen. This occurred when the employer planned to build and launch an automated high-bay warehouse. It became necessary to lay off approximately fifty-five employees at one of the company's locations (half the local workforce). At the same time, several automation and programming specialists were to be recruited.

The unions estimate that the new warehouse will operate using AI algorithms that collect data from production lines (as products carry readable codes), combine them with market-sales data and, on this basis, plan production volumes. Algorithms may also be used on a significant scale in distribution, managing logistics and even scheduling shifts for beverage-warehouse employees.

The company's management did not enter into formal negotiations, as the provisions of the existing collective agreement did not require them to do so. However, the trade unions ultimately received information about the planned investment and the related layoffs because the Labour Code requires trade unions to be informed when collective redundancies are planned. The trade unions then began discussions with management about severance pay for employees made redundant. It was agreed that these would be higher than required by the Labour Code.

4. Key 'lessons' for managers and trade union representatives at the company level

» **In the absence of clear contractual obligations, unions can only react once redundancies are announced**. Trade union leaders do not know of any companies in Polish industry whose collective agreements contain provisions specifying how the employer should act when planning layoffs resulting from the implementation of new technologies, including AI. In such situations, trade unions focus on negotiating the most attractive possible severance pay

» **Introducing mandatory consultation and reskilling clauses into collective agreements would give unions a stronger role and lead to fairer transitions**. One trade union leader acknowledged that it would be beneficial if collective agreements included provisions specifying employers' obligations when introducing new technologies. A defined procedure would eliminate the need to work out how to start the negotiation process each time.

5. Useful links to address questions on AI deployment:

» Rada Dialogu Społecznego (the Social Dialogue Council) **/** www.rds.gov.pl

» NSZZ Solidarność **/** www.solidarnosc.org.pl

» Ogólnopolskie Porozumienie Związków Zawodowych (The All-Poland Alliance of Trade Unions (OPZZ) **/** www.opzz.org.pl

» Konfederacja Lewiatan **/** www.lewiatan.org

» Kompania Piwowarska S.A **/** www.kp.pl

ROMANIA

1. Applicable binding and non-binding national level initiatives for AI regulation in Romania

Romania does not yet have a dedicated, comprehensive AI statute at national level. Instead, at present, AI is regulated indirectly through existing horizontal regimes and the EU AI Act .There are no specific legislative measures regulating AI systems that fall under the general frameworks on cybersecurity, data protection, consumer protection, equality and financial supervision. Binding instruments include the Law 362/2018 - transposing the *Security of Network and Information Systems Directive (NIS)* ((EU) 2016/1148) and the subsequent implementation of NIS2 ((EU) 2022/2555), which updates the cybersecurity law, replacing the original NIS Directive to create a high, common level of security for network and information systems across the EU, with the *National Cyber Security Directorate* (DNSC) designated as the key supervisory authority and amendments enacted by Law 124/2025).

The EU AI Act Regulation came into force on 1 August 2024 and will apply from 2 August 2026. In the meantime, Romania must designate competent national authorities and adopt implementing measures for enforcement, so the core binding AI-specific rules will, in practice, stem from EU law rather than purely domestic legislation.

The main national-level initiative explicitly dedicated to AI is the *National Strategy for Artificial Intelligence 2024–2027* (SN-IA), approved by Government Decision no. 832/2024 in July 2024. This strategy formulates Romania's official vision of AI as a driver of economic growth, social welfare, democratic values and security and sets ambitious targets. For example, the expectation that by 2030 roughly 70% of companies will integrate AI technologies into their operations. Although programmatic, SN-IA is binding on public authorities: it structures national priorities across digital public administration, the digital economy, education, cybersecurity and future technologies, and creates an Inter-ministerial Commission including thirty-four institutions to coordinate implementation. It also foreshadows the creation of a dedicated AI Regulatory Authority to oversee the AI market, support regulatory testing environments and accredit conformity-assessment bodies in the context of the EU AI Act Regulation.

Two further government-approved strategic documents complement SN-IA and are relevant for AI regulation in a broader sense. The *National Strategic Framework regarding AI 2023–2027* (CSN-IA) sets six overarching objectives:

1. building AI skills and education
2. developing resilient infrastructure and usable datasets
3. consolidating the AI R&D systems
4. promoting technology transfer
5. encouraging adoption of AI across society
6. establishing governance and regulatory mechanisms for AI.

While it is largely 'soft' law, the CSN-IA guides ministries and regulators when designing sectoral rules, particularly in healthcare, education, public administration and cybersecurity.

In parallel, the *National Strategy for the Development and Support of Digital Innovation Centres (CID) 2024–2027*, in place since September, 2024, establishes a network of Digital Innovation Hubs offering testing, training and advisory services on AI, blockchain and cybersecurity to SMEs and public bodies, thereby indirectly supporting future compliance with the AI Act Regulation through experimentation, capacity-building and access to expertise.

2. The role of social dialogue in managing AI

Social dialogue in Romania provides an institutional framework with growing relevance for addressing the implications of AI and algorithmic management, based on the social dialogue Law no. 367/2022. This law establishes the general framework for collective bargaining and consultation between trade unions, employers' organisations and the Government and thereby shapes the institutional context within which work-related AI issues may be discussed and negotiated. In this architecture, trade unions, such as BNS, CNSLR-Frăția and Cartel Alfa, together with the two employers' organisations, the Employers' Confederation Concordia and IMM Romania, participate in formal fora such as the *National Tripartite Council for Social Dialogue and the Economic and Social Council,* where they can negotiate, issue opinions and vote on draft legislation with implications for AI and algorithmic management.

Beyond the institutional framework, social dialogue is being used as a practical tool to anticipate and manage the labour-market impacts of digitalisation and AI. Projects, such as Danube@Work and WorkTransitionCEE, explicitly framed AI and automation as core drivers of change in work organisation, skills and employment, and have used tripartite and bipartite dialogue to co-create nationally adapted solutions. These initiatives combined surveys, expert interviews, enterprise case studies and co-creation workshops to equip unions, employers and policymakers with evidence for negotiating training measures, clauses on technology use, safeguards for data protection and worker rights. In this context, social dialogue functions as a core channel through which AI-related risks and opportunities are collectively assessed and translated into concrete workplace and policy arrangements.

The role of social dialogue is further reinforced by more recent social-partner projects such as ***Hope4AI*** and social dialogue partners' broader digitalisation agenda. *Hope4AI* explicitly positions AI as a primary driver of change and builds a structured process, such as the *Skillscape* research, national seminars, validation workshops and co-creation events, to help social partners design fair, human-centred transitions in sectors such as energy and retail.

Romania's overall AI trajectory will depend on how effectively social dialogue informs national strategies and workplace practices. Social partners increasingly view AI, not as an isolated technology, but as a catalyst of a broader digital transition requiring governance that balances decent work and competitiveness.

3. National case study on sectorial and/or company level:

Title of Case Study: AI-supported automation and decision support in the banking sector (Romania)

Company / Organisation – Financial services company

Number of employees impacted - Several hundred employees across back-office, customer service, and operational support functions

Organisations involved in negotiations and a 'good practice' agreement: Company management, HR and organisational development structures, and representative trade unions at company level.

Description of type of AI to be introduced (or already introduced)

> The organisation has gradually introduced artificial intelligence and automation solutions as part of its broader digital transformation strategy. Initial experimentation focused on customer-facing conversational tools, followed by a strategic shift toward internal efficiency and operational support. The main AI applications currently in use include:

» AI-assisted processing and validation of unstructured documents (e.g. contracts, invoices, legal documents)

» Intelligent automation embedded in existing workflow platforms

» AI-supported transcription and thematic analysis of customer interactions in contact centres, aimed at supporting supervisory and quality-assurance functions.

> All systems operate under a human-in-the-loop model, with automated outputs systematically validated by employees or supervisors.

Training / retraining of staff / recruitment of new staff.

Formal, company-wide AI training programmes are still under development. At the time of the interview, access to training was not fully deployed at the company level and mostly role specific. Plans are in place for a more structured training strategy, covering:

» Basic awareness and responsible use of generative AI tools

» Practical guidance on how AI is embedded in operational processes

» Preparation for future task reconfiguration as AI-supported use cases expand.

Trade union representatives are informed about these plans and are expected to be consulted as the training framework is finalised.

Description of the action:

AI implementation followed an incremental and experimental approach:

» **Pilot phase approach:** Early customer-facing AI tools were tested and subsequently scaled back due to reliability and accuracy limitations

» **Operational focus:** The organisation prioritised back-office processes where AI could support document-heavy workflows. AI components were introduced for data extraction and validation, embedded in rule-based systems

» **Scaling and reuse:** Successful automation models were replicated across multiple operational areas, with employees shifting from manual processing to validation and exception handling

» **Decision-support expansion:** AI-based conversation analysis tools were introduced to assist supervisors in monitoring service quality, without automating performance assessments.

Throughout all phases, management emphasised that AI supports human decision-making.

Social dialogue and consultation: Consultation on AI in the examined case study takes place at two levels:

» **Periodic high-level meetings** between senior management and trade union representatives, where automation and process changes are discussed in general terms

» **Operational consultations** through HR and organisational structures when workflow or structural adjustments are approved by management bodies.

There are no specific collective agreement clauses on AI at company or sectoral levels. At the same time, the approach communicated to trade unions indicates that AI is intended to support operational processes, without being used to automate decisions affecting employment conditions or performance evaluation.

Outcomes and experiences: The deployment of AI-supported automation has led to:

» Significant reductions in processing times in selected workflows

» Increased operational scalability during peak workloads

» Reallocation of employee time toward higher value-added activities.

Employee acceptance has been generally positive, reflecting clear internal communication, gradual implementation and the preservation of human oversight (*Human-in Control Principle*). At the same time, both management and employee representatives recognise the need for more systematic upskilling as AI use becomes more widespread.

At national level, Romania displays a heterogeneous landscape of AI adoption, accompanied by ongoing developments in governance frameworks and workforce training practices.

4. Key ‘lessons’ for managers and trade union representatives at the company level

The case study illustrates that, at company level, AI deployment can be accompanied by forms of social dialogue using the existing information and consultation structures that also proved suitable for AI-specific topics. Exchanges between management and trade union representatives have tended to focus on the strategic

direction and general implications of automation, while technical details have remained at operational levels. This approach has supported predictability and mutual awareness during phased implementation processes.

Experience also indicates that AI is most readily accepted when initially applied to operational support functions, where it assists employees in handling complex or high-volume workflows. Maintaining human oversight over AI-supported processes has played an important role in sustaining trust and ensuring clarity regarding responsibility and decision-making.

Finally, the case study highlights the importance of workforce preparedness as the use of AI expands. While training practices are still developing, early communication about future skill needs and the intended role of AI in work organisation has contributed to acceptance by employees. Taken together, these elements suggest that social dialogue can provide a flexible framework for accompanying AI-related change at company level, without requiring immediate formalisation.

5. Useful links to address questions on AI deployment:

» Concordia Employers' Organisation **/** www.concordia.ro

» Blocul Național Sindical (BNS) **/** www.bns.ro

» Economic and Social Council of Romania **/** www.ces.ro

» AI Cluster Bulgaria **/** www.aicluster.bg

» Transylvania IT Cluster **/** www.transilvaniadih.ro

» Cluj IT Cluster **/** www.clujit.ro

» Sibiu IT Cluster **/** www.sibiu-it.ro

» Employers' Association of the Software and Services Industry **/** www.anis.ro

» Ministry of Economy, Digitalization, Entrepreneurship and Tourism **/** www.economie.gov.ro/

» Authority for the Digitalization of Romania **/** www.adr.gov.ro

These Guidelines for monitoring and managing the AI at company level were developed by the Research Teams from the beneficiary organisations:

» Rositsa Makelova - ISTURET/CITUB, Bulgaria

» Krsitina Eskenazi - CEIB, Bulgaria

» Lena Panayiotou - OEB, Cyprus

» Evangelos Evangelou - SEK, Cyprus

» Eliana Como - FDV, Italy

» Salvo Leonardi - FDV, Italy

» Andrzej Zybała - SGH, Poland

» Fabio Bajada - The Malta Chamber, Malta

» Liviu Neagu - CPC Concordia, Rmania

» Gabriel Zvinca - CPC Concordia, Romania

» Frank Vaughan - SIPTU, Ireland

General edition:

» Ina Atanasova - CITUB, Bulgaria

» Kevin P O'Kelly - external expert, Ireland

BENEFICIARIES

- Confederation of Independent Trade Unions in Bulgaria (CITUB)
- Confederation of Employers CONCORDIA (CPC), Romania
- Cyprus Employers & Industrialists Federation (OEB)
- Cyprus Workers' Confederation (SEK)
- General Workers' Confederation (CGIL), Italy
- General Workers Union (GWU), Malta
- Services, Industrial, Professional and Technical Union (SIPTU), Ireland
- The Malta Chamber of Commerce and Enterprise Association (TMCCEA)
- Warsaw School of Economics (SGH), Poland

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- Bulgarian Industrial Association (BIA)
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