

# Artificial intelligence at the workplace

## Recommendations to coordinators and worker representatives in EWCs and SEs

Brussels, septembre 2024 (update)

This document provides information and guidance for worker representatives in European Works Councils (EWCs) and companies under the European Company Statute (*Societas Europaea* – SE), as well as industriAll Europe coordinators assisting them, about the role they can play in dealing with the increasing role artificial intelligence is playing in their multinational company.

### Artificial intelligence at the workplace: What are we talking about?

Artificial intelligence (AI) is a disruptive technology, which has a significant impact on workers, on employment, and on companies alike. AI will create new jobs, but AI will also cause other jobs to vanish. AI can contribute to fast and reliable decision making, but AI can also be highly unreliable and lead to unjust decisions that discriminate against workers. AI can contribute to a safer work environment, but AI can also lead to unforeseen events or undesired machine behaviour that puts workers at risk. AI can also create huge risks to fundamental rights and freedom of workers (e.g. continuous surveillance, total loss of autonomy making people into robots manipulated by AI systems). For a complete survey of the AI risks and opportunities, see the 2024 Syndex study on AI.

The challenge for trade unions is to seize the opportunities offered by AI to improve working conditions and create quality jobs while mitigating its adverse impacts. Trade unions must make sure that those who today perform jobs that will be taken over by AI will receive the necessary training to perform the jobs of tomorrow.

To make sure that AI actually helps improve working conditions and leads to quality employment, workers' representatives at all levels must become active and engage in dialogue with the management about the conditions that are needed to protect workers and their interests. It is of utmost importance to bring this topic to the table, as the investment decisions of today will set the scene for the working conditions of tomorrow and we need to make sure that the AI systems acquired do not impair fundamental rights, working conditions and quality employment. These practical recommendations are a first introduction to AI and how you can address the topic within the framework of your EWC work.

AI is now defined by the AI Act in its 3rd article, as “a machine-based system that is designed to operate with varying level of autonomy and that infers, from the input it receives, how to generate outputs, such as predictions, contents, recommendations or decisions, that can influence physical or virtual



environments”<sup>1</sup>. Here are [some concrete examples](#): AI creating contents, creating images from text, turning a text into a video, analysing huge databases, anticipating machine’s breakdowns and deciding which parts to change, translating texts, discussing with clients, chatting with AI-people as a personal friend, ... AI is and will be used in many areas: production forecasting and planning, energy efficiency, product design, HR management, predictive maintenance, R&D...

**In the HR field, AI** can process data on workers and their performance and provide recommendations on worker management-related questions. These recommendations can, for example, assist HR managers in their personnel planning, but also in their decisions on whom to hire, whom to promote, or whom to deny a pay rise. These are only some examples of the many applications of AI at the workplace.<sup>2</sup>



## REFERENCE

### GENERAL DATA PROTECTION REGULATION (2016)

[Available in different languages](#)

AI and GDPR are closely connected because AI Systems work with collected data.

The General Data Protection Regulation is an EU regulation that applies directly to all EU Member States. GDPR safeguards the data of anyone resident in the EU and applies to organisations throughout the bloc. For trade unions, it is essential to understand how to use GDPR to:

- respect the Regulation when processing members’ data
- ensure that workers’ data is protected at the workplace and employers do not collect and process workers’ private data
- push back against employers who erroneously use GDPR to undermine union activities

According to GDPR, a company may collect workers’ personal data, only if it respects the three following principles (for each collected data):

- The collection must serve a “legitimate” interest
- The collection must be proportionate to the legitimate interest, it means it must be relevant, necessary and not have a “disproportionate” impact on individuals’ privacy.
- Data can be stored, but only for the minimum necessary period

In companies collecting personal data on a large scale, a data protection officer (DPO) must be appointed.

See [industriAll Europe’s GDPR Toolbox](#) for Trade Unionists.

EU aims at developing and encouraging the use of AI at the workplace because it can contribute to economic growth, EU competitiveness and social welfare by bringing down repetitive tasks and unskilled

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<sup>1</sup> To deepen your knowledge on AI, you can check online courses such as the [Elements of AI](#), a course developed by the University of Helsinki (available in +25 languages). You can also consult [the 2024 AI Index report](#) by the Stanford University.

<sup>2</sup> For more examples of AI applications in manufacturing sectors, see the European Commission (2022) report [AI watch: AI uptake in manufacturing](#).



jobs. The European Commission has multiplied initiatives in this sense to set up an EU framework regulating AI, such as the 'AI innovation package' that it launched at the end of January 2024 and which includes, amongst other things, the establishment of an AI office within the European Commission<sup>3</sup>.

But EU also recognises the existence of dangers, in the field of fundamental rights, democracy, health and safety. How to promote AI while at the same time mitigating the risks? That is the purpose of the [AI Act](#)<sup>4</sup>, which was adopted in May 2024 and whose provisions will gradually enter into force from the end of 2024 to 2026<sup>5</sup>.

The AI Act is principally a market regulation. The ETUC has criticised this approach and made a resolution calling for an [EU Directive on algorithmic systems in the workplace](#) (like the one that exists for platform workers, but unfortunately only for this category of worker). Then, as a market regulation, the AI Act contains mostly provisions concerning suppliers of AI Systems. Nevertheless, the AI Act is also of huge importance for companies ("deployers" in the vocabulary of the Act) because, according to the AI Act, all companies using certain types of AI Systems will have to respect some precise principles and requirements.

In its recitals, the AI Act refers to 7 principles, which were defined in 2019 by the EU High Level Expert Group ([ethics guidelines for trustworthy AI](#)). Among those ethics principles, some are very important for workers' rights: human agency and oversight (no decision shall be taken without the intervention of a human-being), respect of safety, respect of privacy and data governance regulation (GDPR), Transparency (AI system shall be transparent to everybody using them), non-discrimination and fairness (AI System must be designed in a way to avoid bias and discrimination).

Requirements which suppliers and companies are subjected to vary according to the level of risk. The AI Act defines three categories of AI Systems, with three different legal regimes according to the risks concerning fundamental rights, democracy, health and safety:

- AI Systems using subliminal techniques, exploiting vulnerabilities, creating biometric categorisation, introducing social notation or detecting emotions are considered as posing an **unacceptable risk** and therefore are forbidden.
- Some AI Systems are considered as **high risk**. The provider of such AI Systems will have to respect strict obligations: register the system to a notifying authority, provide very precise documentation, establish a risk management system and foresee a human oversight. Companies using high-risk AI Systems shall take appropriate technical and organisational measures to ensure that they use such systems in accordance with the instructions for use, as defined by the provider. Two kinds of AI Systems directly impacting workers are considered as high-risk:
  - o All the AI Systems which will be used to hire people, evaluate candidates or workers, make decisions affecting work-related relationships, promotions, performance appraisals and terminations of contract, allocation of work tasks (see point 4 of [annex 3 of the AI Act](#))
  - o All AI Systems that are covered by safety legislation, whether the system is only a component of the product or the product itself (see [annex 1 of the AI Act](#))
- Other AI is considered as **limited risk**. Providers using such simple AI must only make sure that the user knows when (s)he uses or is subject to such AI (principle of transparency).

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<sup>3</sup> More information about the European Commission's AI innovation package can be found online [here](#).

<sup>4</sup> Here a resume of AI Act in [Spanish](#), [English](#), [French](#) and [German](#).

<sup>5</sup> Interdiction of AI Systems with unacceptable risk will enter into force in february 2025. Major other provisions, including those concerning high risk AI System, will enter into force only in August 2026.



The AI Act foresees a general provision in article 4 about AI literacy and training, concerning all AI Systems. Providers and companies of AI Systems shall take measures to ensure that the people who use or are subject to any AI System have **a sufficient level of training and skills**. Some more precise requirements are demanded for high-risk AI Systems, whose providers must establish a training programme that must be effectively implemented by companies.

This new AI Act will bring to light high-risk AI Systems and this categorisation will help workers and trade union representatives to detect the most problematic AI Systems from a safety, discrimination and fundamental right point of view. But be careful, trade unions should not limit their attention to this category of more-visible AI Systems. AI Systems are often invisible to workers, and some AI Systems have a significant impact on employment and working conditions without being high-risk: we must therefore pay attention to the company's strategy in this field and to every AI System. In this paper, most of our recommendations concern all AI Systems (except if we explicitly mention high-risk AI Systems).

Trade unions, including company-level representatives, should be on the offensive to shape a lawful, non-discriminatory and just AI at the workplace which abides by the following principles<sup>6</sup>:

- The human must always stay in command and fully in control. The scope for AI action must be clearly defined and transparent, both for the human and the machine
- Adaptivity and error tolerance must be clearly defined
- The decisions taken by the algorithm must be transparent and contestable, specifically through meaningful and permanent worker consultation
- People who use AI Systems must be thoroughly skilled, with training programmes to alert them to the risks of the system for safety, discrimination and fundamental rights, and the means to mitigate those risks
- AI must help relieve human labour. It must augment human labour, rather than substitute it
- Room must be made for creative tasks in a safe work environment: no worker should be transformed into passive assistant of the AI system
- Workers need to have the right skills at their command to work with the AI and a re- and upskilling strategy should be developed that secures a just digital transition for all

## Recommendation 1 Develop your own trade union strategy

As a worker representative in a multinational company, you have a role to play: be proactive! Do not wait for the management to inform you about the development of AI at the workplace that it might have unilaterally decided. Make up your own mind, assess the different possible scenarios and decide with a trade union agenda on how workers and AI should work together.

### Liaise with your national trade union organisation and with industriAll Europe

Trade union organisations have worked on detailed analyses of the AI challenge and elaborated ambitious trade union demands, tailored to specific sectors. Connect with your national trade union federation and

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<sup>6</sup> See industriAll Europe (2022) position '*All eyes on AI. Artificial intelligence as a challenge and an opportunity for workers and their representatives*' (in [English](#), [French](#), [German](#)).



with the industriAll Europe Secretariat to learn from practices/initiatives in your country, across the EU, and in companies within your sector.



Ask your trade union about existing (governmental or academic) databases which provide information on AI systems currently in use as well as public policies on AI, such as:

- **EU:** [AI Watch \(europa.eu\)](https://ai-watch.europa.eu) offers a comprehensive overview of AI developments in Europe.
- **Germany:** The [Plattform Lernende Systeme](https://plattform.lernende-systeme.de) is a general site on AI in English, with lots of pedagogical information and many concrete examples.
- **All countries:** [Nesta](https://www.nesta.org.uk), a UK-based charity, has designed a global AI governance map.
- **All countries:** The [Center for AI and digital policy](https://www.centerforaianddigitalpolicy.org) (a research NGO) analyses AI practices and national strategies in 50 countries.
- **All countries:** [AlgorithmWatch](https://www.algorithmwatch.org) monitors and evaluates algorithmic decision-making processes which have a social or fundamental rights impact.

Also, many countries have adopted dedicated national AI strategies worth considering when developing your own trade union agenda, here a tool giving access to these national strategies:

- [AI in Europe - European Commission \(europa.eu\)](https://ai-in-europe.europa.eu)

Trade union organisations can also best inform you about the latest developments of the AI strategies discussed by policymakers at national, European and global levels. In addition to closely monitoring the political debates, your national trade union organisation and the industriAll Europe Secretariat are in permanent contact with national and European policymakers who would be eager to hear about your concrete experience of discussing AI in your company and would be supportive in flagging up problematic cases.

## **Liaise and coordinate with the worker representatives in your company based at national and local levels**

It is important to have a strong coordination between European and national levels. New technologies need to be discussed at both EWC and national levels. If policies are agreed upon at European level, it is important to share them with the national level – and the other way around. If policies or agreements are reached at national level, make sure to inform the EWC/SE-WC. Reasons for establishing strong connections and ensuring a good flow of information between the EWC/SE-WC and worker representatives at national and local levels are manifold:

- **This is the best way to identify measures related to AI early on, which may be planned in one country before becoming transnational.**
- **This is the best way to learn from one another, share and exchange best practices** (e.g. learning that an agreement on AI has been struck in one country could have a spillover effect if disseminated widely among your network).



- **This is the best way to make full use of and benefit from rights to information, consultation and participation, which exist not only at European, but also national levels** (including the right to health and safety committees to access extensive information, such as risk assessment or reports on preventive measures, and to receive assistance from experts).
- **Ultimately, it is at national and local levels that AI will be implemented.**

### Develop and fuel your expertise on digitalisation

The EWC/SE-WC also has the right to training and to invite experts to EWC/SE-WC meetings, who can train/educate on AI. This will ease discussions with management.

## Recommendation 2 Get involved in your company

Artificial intelligence at the workplace is a topic for social dialogue! This fundamental principle is at the core of the landmark framework agreement on digitalisation reached by the European cross-sectoral social partners in June 2020. They agreed that a partnership approach between employers, workers and their representatives must govern decisions on the digital transformation of a company to ensure that opportunities are fully grasped, the risks are mitigated, and the legal framework is properly applied.



### REFERENCE

#### THE EUROPEAN SOCIAL PARTNERS' FRAMEWORK AGREEMENT ON DIGITALISATION (2020)

Available in [English](#)

The autonomous framework agreement adopted in 2020 provides clear guidelines for the management of the digital transformation through social dialogue on four key topics:

- Digital skills and securing employment
- Modalities of connecting and disconnecting
- Artificial intelligence and guaranteeing the 'human in control principle'
- Respect of human dignity and surveillance

This European framework agreement is to be implemented, where necessary, by trade unions and employers at national, sectoral and company levels.

This agreement is of the utmost importance:

- Should your employer be a member of an employer organisation, he/she is very likely to have committed to implement the agreement in dialogue with you.
- The framework agreement lists many measures to be considered. It can then provide ideas for negotiation at company or sectoral level CBAs, and trade union representatives can take hold of the provisions of this framework agreement in the IC process.



Taking artificial intelligence as a topic for collective bargaining is a quite recent trend. Some examples of national, sectoral or company agreements already exist, especially in Spain, Italy, Germany, Austria and Finland<sup>7</sup>. Most of the examples concern ICT services at this stage, but industrial sectors and companies can also include AI as a subject for CBAs. Concretely, subjects of such CBAs are: data protection, principles (e.g. transparency, explainability, human-in control...) and ethics, digitalisation strategy, training on AI tools, the right to disconnect, IC rights, workers' rights... Those agreements specify and embody the national legal framework or the EU framework agreement. They sometimes add original provisions in order to fill loopholes of the legal framework (e.g. ethics committees with trade union representatives, HR managers, IT officers).

## **AI AND ROLE OF THE REPS: THE OVERALL STRATEGY AND EACH PROJECT MUST BE ANALYSED FROM NOW ON FROM THE AI PERSPECTIVE**

AI is multidimensional. It deals with strategy, HR, organisation of work and working conditions. In each country, there are national requirements for Information and Consultation of Reps and some countries have foreseen special provisions for AI in their labour law<sup>8</sup> but according to directive 2002/14 establishing a general framework on IC rights, each company shall at least inform and consult Reps on the following general topic: economic situation, probable development of employment, anticipatory measures and on a project which lead to substantial changes in work organization. Then, when you are informed and consulted about these general topics or when a digitalisation project is introduced, you now have to consider the AI dimension: How will AI change a company's strategy? What impact will AI have on employment? What dimension does AI have in the new projects of the company?

But it is necessary to ask for clarification concerning this AI dimension at the level of EWC in case of transnational matters.

At the company level, according to the EWC and SE directives, EWCs and SE-WCs have the right to be informed and consulted "in particular to the situation and probable trend of employment, investments, and **substantial changes concerning organisation, introduction of new working methods or production processes...**"<sup>9</sup>. As technological changes will often have effects on employment, investments, and surely introduce new working and production methods, it is clearly a topic that falls under the scope of the EWCs/SE-WCs.

As an EWC/SE-WC member, you should allocate time at your meetings to share the developments in the different countries also when it comes to technological changes. Furthermore, you should make sure that investment in new technologies and the consequences of new technologies are addressed at the meetings with central management.

## **THE SPECIFIC ROLE OF REPS FOR HIGH-RISK AI SYSTEMS**

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<sup>7</sup> For more details, see the [data base](#) made by UNI Europa and the FES.

<sup>8</sup> Especially in Spain (the Workers' Statute includes since 2021 [new obligation to inform employees' legal representatives about AI](#) and algorithm use, including "parameters, rules and instructions of AI Systems") and in Germany (works constitution law foresees since 2021 that employers must consult a works council before introducing any AI system -[art 90 paragraph 3](#)- and that the works council has the right in such situation to call on the advice of experts -[art 80 paragraph 3](#)).

<sup>9</sup> See your own EWC-agreement or the subsidiary requirements of [2009/38 EWC Directive](#).



The AI Act has established a framework for AI providers when they put a new AI System on the market. But the AI Act also foresees requirements from companies. When they introduce a high-risk AI System in their organisation, companies must respect special obligations listed in [the article 26](#), including:

1. Companies shall take appropriate measures to ensure they use the system in accordance with the instructions of use
2. Companies shall assign human oversight to natural persons who have the necessary competence, training and authority (like in the field of safety at work).
3. Companies shall inform the provider and the surveillance authorities of the incidents and if the system presents a special risk (defined in article 79), they must suspend without delay the use of the system.
4. Companies must inform affected workers that they will use (or be subject to the use of) a high-risk system.
5. According to the AI Act, companies must inform workers' representatives when they introduce a high-risk system. Note that if the system, whether high-risk or not, introduces substantial changes to work organisation or has an impact on employment, trade union reps have to be consulted (see above).

See further all the questions the reps can ask in case of introduction of a new AI System with high risks.

These requirements are the base to legitimate EWC/se-WC's intervention in the debate when new AI Systems are introduced.

### Recommendation 3 Discuss with management

Bring up AI in the work of the EWC/SE-WC and include it for discussion with the management. Careful: this is not a one-off discussion, but one that has to take place regularly. Note that AI systems may be learning systems. Once deployed, machine learning applications may constantly evolve and may change their purpose of application, the way they operate, and the way they process data. Routine checks are required to make sure that workers and their data are adequately protected.



**TIP!**

Request a mapping of all AI systems in place in your company, or about to be implemented: Where? Which one? What for? Which ones are high-risk and what kind of risk does each one generate?

For each AI System (at least for high-risk AI Systems), ask the management to develop an impact assessment of the AI system to be introduced at the workplace, with specific regard to the impact on fundamental rights (e.g. risks of discrimination, permanent control, ...), employment (e.g. number of jobs affected, skills need) and working conditions (positive or negative impact?).

Suggest to the management the creation of a position of a data accountant or data officer, whose duty is to control and report annually on the use of AI systems, in the



way a financial accountant controls and reports on the financial situation or the Data Protection Officer controls the application of GDPR.

AI is a multifaceted phenomenon. It is not just one topic (data protection or digital skills...) that you would put on the agenda of your EWC/SE-WC meeting occasionally. It is a much more encompassing concept, with many different dimensions, as well as an ongoing process, requiring regular monitoring.

Note also that the discussion with the management has to take place regularly AND at each time a new AI System is introduced.

EWC/SE-WC members are advised to raise the following topics with central management and **engage in information and consultation**, with the support of experts, on the likely impact of AI (country by country) on the following topics:

### AI and company's strategy

- Is there an overall AI strategy in the company, and what is it? In which areas is the company investing in AI?
- Is the company planning to change its business model or strategy due to AI (e.g. use of predictive maintenance, automated design and customisation, scheduling optimisation)?
- What are the expected/achieved increases in productivity with the introduction of AI?

### Investments in AI

- In which areas is the company investing in AI?
- What are the expected/achieved increases in productivity with the introduction of AI?
- What is the cost of investment in AI and the expected return on investment?
- Will AI be developed internally or by external companies? If external, how will maintenance/monitoring be carried out (e.g. external expertise on the system, long-term maintenance contracts, in-house maintenance possible)?
- How are the employees involved in testing and implementing AI? How are the experiences of the workers used to improve processes?



## Employment, training and skill development

- How is the level of employment expected to evolve in the company in relation to the introduction of AI: creation, transformation, destruction or displacement of jobs? Split information by qualification and gender.
- How will evolve the ratio between low-qualified profiles ( $\leq$  upper secondary) and high-qualified profiles because of introduction of AI systems?
- How is the company integrating AI in its long-term, strategic skills planning (identification of skills needs for the future, and development of corresponding training offers)?
- Which different kinds of skills sets will be required in future, particularly with regard to human-machine interaction (HMI) and human-computer interaction (HCI)? How does the company intend to make sure that workers understand their own roles and tasks within their jobs and vis-à-vis the machine?
- Have all workers access to re- and upskilling training?
- Does training policy related to AI include development of personal skills, such as problem-solving skills, critical thinking...?

## Job content, working conditions and work organisation

- How will AI affect work processes, as well as workers' ability to influence their own work planning and processes?
- Is AI giving workers more autonomy or, on the contrary, more control and inflexible working routines? Are workers able to exercise oversight on AI systems? Is the human in control principle respected?
- Which redress mechanisms are in place to guarantee that workers can challenge algorithmic decisions that affect them?



## Human Resources AI System (hiring, monitoring of employee behaviour and performance, work organisation...)

- What are the different AI systems used by the company in the area of HR Management? For each system: what is the purpose? Is this AI system considered as “high risk” in the sense of AI act? What are the associated risks? Which measures are taken to mitigate these risks?
- Which human oversight is in place to check each HR process run by AI (e.g. recruitment, professional advancement, including promotions and pay rises)?
- How are workers’ performance and behaviour monitored, both in and outside work (e.g. vAI GPS tracking devices, geolocation on mobile devices, on company cars...)?
- How is automated profiling being performed on workers and how can workers access their profiles?
- Which analysis tools of the Microsoft Office 365 package are used? Who has access to this data? For what purpose are they being stored and for how long? (i.e. MyAnalytics, WorkplaceAnalytics...)<sup>10</sup>

## AI and Employee data protection

- How will information about employees be shared with the EWC/SE-WC and worker representatives?
- Which personal data are collected by each AI System? For each collected data, ask the management: on which legitimate purpose is based the collection? Does this data collection respect the principle of proportionality? How long will be stored the data and is this span necessary to the purpose?
- Where are the data stored, where are the servers and under what jurisdiction? How is the data used? Who has access to the data? Is the workers’ data sold to external companies? What rights do workers have to access the information the company has on them?
- How does the company make sure that the AI systems are GDPR compliant?

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<sup>10</sup> Tools such as MyAnalytics or WorkplaceAnalytics can track user behaviour. Based on parameters such as keystrokes or dwelling time on a specific application, performance control can be conducted. As these systems are highly unreliable and as this can lead to unlimited and real-time monitoring of the employee, the use of Microsoft Office 365 for surveillance and performance control should be avoided.



- For which AI system was a data protection impact assessment<sup>11</sup> carried out? How is the right to access the impact assessment secured?

## Occupational health and safety

- Which new technologies/AI can the company introduce to better protect workers' health and safety?
- Has AI released workers from certain burdensome tasks or, on the contrary, increased physical and psychological pressure?
- Is the impact of AI on occupational health and safety controlled (e.g. work-related stress due to intensification of work)? Has a risk assessment been conducted? How are workers associated with it? Is the risk assessment updated on a regular basis?

## When a new AI system is introduced

- What are the consequences of this new IA system on employment? On organisation of work? On autonomy of workers?
- Does the system replace repetitive activities? Or in the contrary specialize some people on repetitive actions?
- Is that new IA system considered as "high-risk" in the sense of the IA Act? If yes:
  - You can get the risk assessment made by the provider<sup>12</sup>
  - Which precise risks do generate the AI System?
  - Which special measures will be taken by the management in order to mitigate the risk on health and safety? On fundamental rights?

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<sup>11</sup> In application to [GDPR article 35 \(directive reference\)](#) : when a type of processing using new technologies is likely to result in a high risk to the rights and freedoms of natural persons, an assessment of the impact of the envisaged processing operations on the protection of personal data must be carried out.

<sup>12</sup> According to article 9, AI providers must establish a risk management system, with the assessment of the risks, the measures which shall be taken to mitigate the risks, incidents' report, etc... This information will be very technical and you may need an expert to ensure that your company uses the system according to the provisions established by the provider.



- Does the system respect the human in control principle? Who are the natural persons who oversee the AI System? Have they got competence, training and authority?<sup>13</sup>
- Is the system transparent for the users? How will workers be informed? If a worker doesn't understand or agree with a decision apparently taken by the AI System, who is the contact person for him?
- What is the training program for the concerned employees?
- Before introducing the AI system has the employer carried out a data protection impact assessment (in sense of art 35 GDPR)? What are the results?
- Which data collects the AI Systems? Do this collection respect GDPR's provisions?
- You may also make proposals, here some propositions
  - An impact assessment be made before the introduction, especially on safety, working conditions and fundamental rights
  - A period of testing of the new system
  - The appointment of a person in the company responsible for the new high-risk AI system (a controller of the AI System, on the model of the controller of a data processing). This person would be responsible for the right use of the AI system and could be the contact person for workers and Reps for every problem
- Before introducing the AI System has the employer carried out a data protection impact assessment (in sense of article 35 GDPR)? What are the results?
- Which data collects the AI Systems? Do this collection respect GDPR's provisions?

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<sup>13</sup> In accordance with the AI Act's article 14 concerning high-risk AI Systems.



IndustriAll Europe and its affiliated trade union organisations are here to support you. For all questions, suggestions, or should you need specific assistance to advance dialogue on AI with your management or policymakers, please contact:

- ⇒ **Your national trade union organisation**
- ⇒ **The industriAll Europe coordinator assisting your SNB, EWC or SE-WC**
- or
- ⇒ **IndustriAll Europe's dedicated team**

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 **Read more...**

IndustriAll Europe has worked on artificial intelligence over the past years. Here is a compilation of existing positions and studies which can be useful for your EWC/SE-WC discussions.

### IndustriAll Europe positions per topic

<b>Artificial intelligence</b>	<p>Position Paper (2024), 'Taming <i>Artificial Intelligence and TUs' strategy</i>'</p> <p>Policy Brief (2024), 'AI in the industriAll Europe world of work, an industrial policy approach' Position paper (2022) '<i>All eyes on AI. Artificial intelligence as a challenge and an opportunity for workers and their representatives</i>', <a href="#">English</a>, <a href="#">French</a>, <a href="#">German</a></p> <p>IndustriAll Europe contribution to the public consultation on the draft AI Act (2021), <a href="#">English</a></p> <p>Policy Brief (2019) '<i>Artificial Intelligence: Humans must stay in command</i>', <a href="#">English</a></p>
<b>Data usage</b>	<p>Policy Brief (2017) '<i>Sharing the value added from industrial Big Data fairly. The know-how of EU industrial workers must not be stolen by Big Data monopolists</i>', <a href="#">English</a></p>

### IndustriAll Europe positions per sector

<b>Metal, Engineering and Technology-based (MET)</b>	<p>Joint statement (2023) '<i>Artificial intelligence in the MET industries. IndustriAll Europe &amp; Ceemet joint conclusions</i>', <a href="#">English</a>, <a href="#">French</a>, <a href="#">German</a></p>
<b>ICT</b>	<p>Position paper (2021) '<i>IndustriAll European Trade Union Action Plan. The European ICT sector at a crossroads</i>', <a href="#">English</a>, <a href="#">French</a>, <a href="#">German</a></p>

