The Telecom Social Dialogue Committee

Updated Declaration on Artificial Intelligence (November 2025)

Artificial Intelligence: a blueprint for unions and telecom companies

Technology and digital innovation have drastically transformed work and employment in unprecedented ways. The purpose of this revision is to align our commitment with recent legislative and technological developments, e.g. in relation to large language models (LLM), generative or agentic AI and the EU AI Act.

The European social partners in the telecom sector, UNI Europa ICTS and Connect Europe appreciate the work already undertaken at European level, especially regarding the adoption of the European Artificial Intelligence Act[1] as a pioneering piece of legislation. The EU AI Act can only achieve its purpose if its implementation at the level of Member States and the company level considers the interests of social partners, who should be regularly consulted.

In addition, the announced Apply AI Strategy, the upcoming Cloud and AI Development Act, and the Digital Simplification package are opportunities to improve Europe's capacities and productivity in the AI sector in a sustainable and socially beneficial way - but only if they are implemented in cooperation and consultation with social partners.

Considering recent developments in AI technology, it is necessary to update our joint position on this issue. The changes in the labour market that we have expected have, in fact, materialized and already impacted on the nature of work itself and will continue to do so. The telecom social partners have provided an analysis of the impact of disruptive technologies on the sector in their recent project on Accelerating Sustainability in Telecoms (AST)[2].

UNI Europa ICTS and Connect Europe, acknowledge the beneficial potential of Artificial Intelligence (AI) for innovation, e.g. in the areas of healthcare, science, education, mobility and communication. The European Commission has identified electronic communications as a strategic sector where the adoption of AI should be promoted to boost economic growth and strengthen the competitiveness of European companies. [3]

In the employment context, AI systems could take over repetitive or dangerous tasks, enabling workers to focus on more significant or higher-value tasks. More broadly, the implementation of AI systems should improve the citizen's lives and benefit not only people, but also the planet by driving solutions to combat climate change, noting that the large-scale use of AI itself is a contributing factor to high energy consumption by AI companies and datacentres.

[1] EU Artificial Intelligence Act, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1689

[2] Cf. https://www.uni-europa.org/wp-content/uploads/sites/3/2024/04/20240429_AST_Research-report_final.pdf

[3] Cf. https://commission.europa.eu/topics/eu-competitiveness/ai-continent_en

Nevertheless, with new technologies come both opportunities and challenges. In the case of AI, the challenges we must tackle are related to skills and training, health and safety, ethics, privacy and data protection, equality and fundamental rights[4].

The European Commission's focus on innovation, investment and the potential productivity gains of AI alone is insufficient to ensure a sustainable and beneficial AI adoption. An acceleration of AI uptake in the telecom sector – as set out in the Commission's plan for an Apply AI Strategy - can only be successfully operated if we consider the challenges and concerns of sector social partners that are central to achieving its implementation.

With this Joint Declaration, the European social partners in the telecom sector aim to contribute to the broader debate on AI and provide guidance to sector stakeholders on the opportunities and risks that AI presents.

We favour a humans-in-command approach to AI, meaning that humans should remain in control of all technology[5]. We also firmly support respect for human rights as a cornerstone value in the use of all AI technology. AI and other emerging technologies should not hinder individual well-being and help build a sustainable and inclusive society. The social partners welcome that the guiding principle of the EU AI Act is to promote human-centric and trustworthy AI "while ensuring a high level of protection of health, safety, (and) fundamental rights."[6] This guarantee of fundamental rights should apply in particular to the workers involved in the development and use of AI systems in the whole lifecycle of a system.

As social partners, our responsibility is to help shape the design, development, implementation and regulation of AI systems, and to raise awareness about ethical concerns among both AI developers and users. Without social dialogue, we cannot develop the most effective strategy for AI. European trade unions and employer organisations as social partners have an essential role to play in resolving complex questions regarding employment, training, the nature of work, inequality, and social protection systems. Decision-makers at the national and EU levels must listen to and cooperate with both unions and employers. And we must all recognise and use the expertise of those who are immediately involved in, or affected by, the design, development, and use of AI systems. On a practical level, social partners should participate in establishing appropriate norms and implementing mechanisms, developing and monitoring training, and ensuring governing accountability.

This revised Joint Declaration serves as our blueprint for the social partners in the telecom sector to roll out a flexible framework for ethical and accountable AI across countries and across all levels (European, national, and local). It provides the key principles agreed upon by both Trade Unions and telecom companies, in line with the EU AI Act, with a view creating the basis for the development and use of AI to the benefit of both societal and economic objectives.

[4] Cf. ILO Declaration on Fundamental Principles and Rights at Work, https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm

[5] This approach has also been adopted by the European cross-sectoral social partners in their Framework Agreement on Digitalisation, https://www.etuc.org/system/files/document/file2020-06/Final%2022%2006%2020_Agreement%20on%20Digitalisation%202020.pdf

[6] EU Artificial Intelligence Act, article 1, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1689

1. An ethical approach to Artificial Intelligence

The design, development, and implementation of AI systems is closely linked to ethical concerns about the "nature" of AI and how it impacts e.g. on data-based decision-making processes or human-machine interaction.

For UNI Europa ICTS and Connect Europe, an ethical approach to trustworthy AI is particularly important when considering how AI systems are designed and implemented in the workplace. The ethical, practical, and legal dimensions of data collection and management, will remain a challenge with the use of AI now and into the future.

Furthermore, the use of AI in sensitive business operations can have a great impact on an organisation's workforce: automation of human resources deserves particular attention, as the results of AI-based decisions can influence the destiny of potential and existing employees.

While the uptake of AI is meant to enhance productivity, competitiveness and innovation, it is important to address work-related risks stemming from AI and algorithmic management such as stress, work intensification, time and performance pressure, social isolation as well as monitoring and surveillance.

To mitigate potential impacts on workers' health, autonomy, privacy and working conditions, it is important to promote a human-in-command based use of AI and to strengthen social dialogue and collective bargaining when new technologies are introduced at the workplace and when systems are significantly changing. Meaningful social dialogue - based on continuous, transparent communication and information - on AI introduction and implementation is essential to gaining the trust of the employees and to facilitating AI adoption.

The social partners welcome that the EU AI Act ensures not only that European companies adhere to ethical principles but also calls on the European institutions to take appropriate legal action to ensure that rules and laws on AI services also apply to digital AI service providers established outside the EU, who use and/or sell their products and services in the EU.

1.1 Data Collection & Management

The success of Artificial Intelligence depends on the availability of large, high-quality training datasets. The collection, management and use of data that feed AI must comply with European ethical norms, legal requirements and fundamental rights that together form an ''ecosystem of trust''.

The Social Partners recall that the processing of personal data for the training and use of AI in the employment context must abide by the obligations and safeguards of the General Data Protection Regulation (GDPR) and the EU AI Act.

The European Commission has announced a new Data Union Strategy to increase the availability of data for AI innovation and development. In the Communication on the AI Continent Action plan, the Commission announces its intention to streamline "existing data regulation to reduce complexity

and administrative burden (…) based on an inclusive process (…) .[7]" Such an initiative should not undermine the provisions laid down in the GDPR, and this process should include social partners as industry stakeholders.

Most general-purpose AI models in existence today have been trained in full opacity on enormous amounts of copyright-protected content and personal data, scraped and copied from the internet without any authorisation nor any remuneration for the creators. AI-generated deep fakes and other AI-manipulated content poses a significant threat to our democracies, our members' reputation and moral rights, and to citizens' trust in the veracity of digital content.

Using works in the context of AI models is radically different from traditional forms of exploitation. Proper measures are needed to facilitate and persuade General-Purpose AI providers to seek prior authorisation and abstain from unauthorised uses of copyrighted material.

The social partners appreciate the overarching objective of creating access to high-quality datasets to reduce discrimination and bias and to develop fairer and more effective AI applications. A sustainable European Apply AI Strategy must also address challenges in the data supply chain. Data labelling and content moderation is often outsourced, increasing the need to improve working conditions and access to collective bargaining and union representation.

1.2 Fairness and Accountability of AI Decisions

Another aspect of the broader introduction of more advanced computer systems is the possibility of delegating decisions from humans to computers. While this presents an opportunity for increased productivity, it also poses challenges if decisions made. If decisions taken by AI systems are biased or inaccurate, they also pose challenges.

The Social Partners stress that transparency is crucial to building trust in new technologies. AI systems should be as transparent as possible for employees, allowing them to understand both how their data is used, and how decisions affecting them are taken. The degree of insights required should depend on the technical feasibility and complexity of the system as well as its impact on individual and collective rights.

Algorithmic bias and resulting employment discrimination are particularly concerning phenomena that need addressing to ensure that technology works in the service of people, not against them. Transparency alone is not enough. Companies should provide robust mechanisms that mitigate the unwanted effects of AI-based decisions and that help employees ensure the negative impact of AI on their rights is averted or corrected.

Although it can be challenging to prove the absence of bias in the datasets at input level, it is certainly critical that employers avoid bias in the result of AI decisions at output level. A key principle to prevent

[7] European Commission, AI Continent Action Plan

poor or even dangerous decisions is ensuring that humans have oversight over AI systems and are ultimately responsible for their decision.

The implementation of AI systems raises many concerns and fears as regards the nature of the data that is collected and what it is used for (for instance, the use of AI for biometrics, facial recognition etc. in HR processes or monitoring tools).

It is essential to recognise the role of social partners in raising awareness about these challenges and discussing the ethical boundaries of AI systems and the data collection/management they require. This could be, for example, by integrating the debate on AI governance into existing social dialogue structures (e.g. works councils…) and/or create advisory boards (with the participation of social partners).

To make this line of responsibility function well, we need to ensure that employers establish adequate mechanisms for data governance and accountability that reflect ethical considerations, and that social partners are fully involved in them. Human oversight models which include regular reporting on potential misuse should be proportional to the risks involved by the AI application at hand.

Decisions made by algorithms can lead to less democratic workplaces if they are not followed up with adequate supervision. Therefore, social partners should focus on essential principles for avoiding bias, including, but not limited to: transparency, traceability, and neutrality of AI systems. This neutrality should consider e.g. age, gender, health, ethnicity, religion, union membership/activity, or political affiliation.

Trustworthy Artificial Intelligence must not be an empty slogan. The Social Partners remain committed to playing their part in reconciling innovation, efficiency, and the protection of employees' data and fundamental rights.

2. The need of a building site of European AI skills

Artificial Intelligence, as well as any other type of constant technological change, leads to major transformations with direct impact on skills and training. This is particularly true in the telecommunication industry, which constantly faces significant disruption. At the same time, as we look ahead, major telecoms-lead innovations and its applications are expected to create a wealth of opportunities for the telecom ecosystem at large[8].

AI is not merely changing the way individual tasks are performed, nor does it simply lead to task-level automation or augmentation, instead, it is reshaping the architecture of work itself by transforming workflows, decision-making structures, power dynamics, and business models. For example, we see a reallocation of tasks within teams and across roles—not necessarily job losses, but a redefinition of the very logic of roles. Decision cycles are compressed where AI tools centralize or reassign decision-making, thus impacting on traditional management roles and structures.

[8] For a more detailed analysis of disruptive technologies impacting the telecom sector, see the Connect Europe – UNI Europa project report "Accelerating Sustainability in Telecoms", https://www.uni-europa.org/wp-content/uploads/sites/3/2024/04/20240429_AST_Research-report_final.pdf

Europe needs to invest into a framework for ICT skills ensuring our telecom workforce can build, deploy, and scale sovereign European technologies rather than remain locked into non-European vendor solutions.

The number one priority is to boost both hard and soft skills associated with ongoing, new and emergent technologies in the sector developing new expertise through adaptive learning, while ensuring adequate resources are dedicated to training and re-training. If not addressed, the potential benefits of AI technology will not be realised.

The EU AI Act reflects this urgent need to promote AI literacy, and the European Commission correctly points out that "AI (…), is revolutionising the labour market ", and that "more AI talent is needed, but reskilling workers is also imperative"[9].

This effort cannot be the sole responsibility of the industry and of its workers. Because of the high value-added that innovation can bring to society, it is in the primary interest of all stakeholders – public and private – to prioritise and scale up digital skilling and training programmes.

This process should involve industry, government, social partners, schools, colleges, universities and training providers as they are crucial in supporting this transformation process and ensuring nobody is left behind.

Two key challenges remain in the telecom sector: attracting and recruiting new and competent talent from a much broader and diverse group; and the necessity of further training and upskilling the existing workforce. Developing initiatives for digital upskilling and promoting diversity within the European telecoms sector, with a particular focus on gender equality, the ageing workforce and vulnerable groups, will be key to success.

Furthermore, a constant update of skills will become increasingly important in the future, and this should be done in close cooperation between employer and employees.

We welcome that the European Commission has acknowledged the important role of social partners in the AI Continent Action Plan, stating that "social dialogue is key to address skills needs in the labour market and facilitate the adoption of digital technologies in Europe's workplace in a fair and inclusive way"[10]. In this regard, it will be essential to involve social partners in all skills related initiatives (e.g. Digital Skills Academies, Digital Innovation Hubs Network, Digital Large-Scale Partnership -within the Pact for Skills- and Digital Skills and Jobs Platform) by addressing this issue through social dialogue and collective bargaining agreements. This should also be the case in the announced structured dialogue with industry stakeholders to identify sector-specific challenges and deliverables.

The Union of Skills initiative represents a crucial step toward building AI literacy and digital capabilities across Europe. By connecting education, training, and employment systems, this initiative can help ensure that workers in the telecom sector—and across the broader digital economy—are equipped to navigate AI-driven transformation. Social partners must be actively involved in shaping the Union

[9] European AI Act, article 4, and European Commission, Call for evidence on the Apply AI Strategy (https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14625-Apply-AI-Strategy_en)

[10] European Commission, AI Continent Action Plan, COM(2025) 165 final, https://commission.europa.eu/topics/eu-competitiveness/ai-continent_en

of Skills roadmap to ensure it addresses sector-specific needs and protects workers' rights during transitions.

This calls for an ongoing discussion and trust-based cooperation between social partners at all levels (European, national, industry and company). As an example, a standard skill set that might be required includes such skills as: creative problem-solving, critical and analytical thinking, general knowledge about AI mechanisms and mode of action; continuous learning, decision making, interaction and cooperation skills, empathy, systemic thinking, the ability to withstand uncertainty and pressure and intuition.

In short, the following areas of focus should constitute the lighthouse for all AI policies in the sector:

1. Within the telecoms industry:
    - Re and up-skilling of current workforce
    - Hiring of diverse talent to handle AI
    - Create new tasks and jobs to offset the automation of tasks
2. In the tech and telecoms ecosystems:
    - Education of partners along the value-chain, also on the high consumption of resources and on renewable energy
    - Activate stakeholders and partners on ethical matters
    - Facilitate uptake by/awareness among customers
3. Through policy and government action:
    - Support to industry schemes for re and up-skilling of current workforce
    - Boost education and training programmes for AI and AI ethics
    - Promote AI education and uptake across sectors, with special regard to SMEs and Public Administration

3. Conclusions

The Social Partners remain committed to advancing the telecom industry's overarching objectives as shown in our projects on Accelerating Sustainability in Telecoms (AST)[11] and on Digital Upskilling for All (DUFA)[12].

Europe has the opportunity to activate some of its key assets and lead in the development and uptake of human-centric AI.

To ensure digital sovereignty and the capacity to shape the future of AI in accordance with European interests, it is essential to foster the development of high-performance, competitive, and trustworthy European AI models. These models must be transparent, auditable, fully open source, and grounded in fundamental rights, data protection, and ethical innovation – and must also comply with the

[11] https://www.uni-europa.org/news/uni-europa-and-connect-europe-adopt-landmark-joint-social-partner-declaration-on-sustainability-in-telecommunications/
[12] https://connecteurope.org/projects/DUFA

enforcement of key legislative instruments, including the Digital Services Act (DSA), the Digital Markets Act (DMA) and EU AI Act.

The European social partners in the telecom sector are committed to play their part in this process.

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