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Feedback from German Social Insurance issued 25 September 2026

European Commission call for evidence on EU action to
improve working conditions, health and safety at work and
implementation of workers' rights – Quality Jobs Act



I. Preliminary remark

The German Social Insurance (DSV) welcomes the European Commission's objective of responding to changes in the world of work through the planned Quality Jobs Act and of strengthening good working conditions and the protection of workers in the European Union. From the DSV's perspective, the planned measures on safety and health at work and on the use of algorithmic management and artificial intelligence (AI) provide an opportunity to adapt occupational safety and health to an increasingly digital and flexible world of work. A high level of protection should continue to be maintained, while at the same time ensuring that requirements can be implemented effectively and practicably in day-to-day workplace operations.

Where gaps in protection exist and new European requirements are to be adopted, these should build on established occupational safety and health instruments, in particular risk assessment. Where there is a need for European regulation, clear protection objectives should be formulated while maintaining sufficient scope for sector- and activity-specific solutions. Duplication of rules as well as additional assessment, documentation or evidence requirements without any discernible added value for the protection of workers should be avoided.

II. Opinion

1 _ **Safety and health at work**

From the DSV's perspective, workers' safety and health must be ensured regardless of whether they work within or outside an employer's premises. The modernisation of the Workplace Directive and the Display Screen Equipment Directive being considered by the Commission could help adapt the existing legal framework to changing forms of work and new risks. A blanket extension of the requirements applicable to traditional workplaces to all forms of work outside the employer's premises appears neither appropriate nor practicable. Rather, consideration should be given to the extent to which the employer can actually influence the respective working conditions. At the same time, responsibility for safe and healthy working conditions cannot be transferred entirely to workers. The requirements should be based on the respective form of work, the specific risks and the employer's actual ability to influence working conditions. In particular, a distinction should be made



between permanently established telework, regular home office work and changing forms of mobile work.

Risk assessment is the central instrument for identifying risks to safety and health at work and determining appropriate protective measures for the respective workplace. In Germany, the obligation to carry out a risk assessment explicitly also applies to psychosocial risks. Work intensity, work organisation, social relationships, availability and the increasing digital management of work can also have significant effects on workers' safety and health. What is therefore decisive is how work is specifically organised under the respective workplace conditions. New European requirements should be integrated into existing processes, such as risk assessment. Additional assessment, documentation and evidence procedures that are separate from these processes should urgently be avoided. When specifying the requirements, the different perspectives of workers' and employers' representatives must also be adequately taken into account.

2 _ Algorithmic management and artificial intelligence at work

Algorithmic management and AI can have significant effects on the design and organisation of work. They can support work processes and reduce the burden on workers, but at the same time can also create new pressures, for example through increased time and performance pressure, high work intensity or the risk of surveillance. The Commission also points to both the potential benefits and the corresponding risks to workers' autonomy and well-being.

From the DSV's perspective, such systems should be regarded as part of work design. Their effects on safety and health should therefore be systematically taken into account in workplace prevention. Potential risks should consistently be considered before the introduction of an AI or algorithmic management system and as part of the risk assessment. Workers and their representatives should be involved accordingly. In addition, appropriate human control and correction mechanisms as well as regular reviews of the protective measures taken are required. The approaches referred to by the Commission concerning transparency, information, human involvement, proportionality and social dialogue can make an important contribution to finding good solutions at workplace level.

If rules on algorithmic management and AI at work are proposed, they should build on existing processes. Additional stand-alone assessment and documentation procedures could place a burden particularly on small and medium-sized enterprises without necessarily improving the protection of workers. The interaction with existing

rules, in particular the AI Act, data protection law and occupational safety and health legislation, would also need to be clearly regulated.

3 _ Right to disconnect

Sufficient and genuinely usable rest periods are an essential prerequisite for safety and health at work. Digital means of communication and flexible forms of work must not result in the boundaries between working time and rest periods becoming permanently blurred. In this context, the DSV considers it important that reliable rules on working time and place of work are in place and that existing rest and recovery periods can continue to fulfil their protective function under the conditions of digital and mobile work. If new European measures are considered necessary, they should be closely linked to existing working time and occupational safety and health legislation, and their effective application should also be ensured under the conditions of digital and mobile work. Sufficient scope should be provided for solutions agreed by social partners and at the workplace level when it comes to practical implementation.

4 _ Enforcement of existing rules

Effective occupational safety and health requires not only appropriate legal requirements but also their consistent and practicable implementation in workplaces. From the DSV's perspective, measures to improve enforcement should focus in particular on areas where there is an increased risk of non-compliance with occupational safety and health rules. This applies, for example, to subcontracting, which could weaken occupational safety and health and impede effective oversight. The Commission also identifies an increased risk of non-compliance with existing rules in this area.



About us

The German Federal Pension Insurance (DRV Bund), the German Social Accident Insurance (DGUV), the National Association of Statutory Health Insurance Funds (GKV-Spitzenverband), the national associations for statutory health and long-term care insurance funds at the federal level and the Social Insurance for Agriculture, Forestry and Horticulture (SVLFG) have joined forces to form the "German Social Insurance - Working Group Europe" (Deutsche Sozialversicherung Arbeitsgemeinschaft Europa e. V.) with a view to their common European policy interests. The association represents the interests of its members vis-à-vis the bodies of the European Union (EU) as well as other European institutions and advises the relevant stakeholders in the context of current legislative projects and initiatives. As part of the statutory insurance system in Germany, health and long-term care insurance with 75 million insured persons, pension insurance with 57 million insured persons and accident insurance with more than 70 million insured persons in 5.2 million member companies offer effective protection against the consequences of major risks of life.