For quality jobs in the EU, we need EU level measures to address recruitment-related abuses and provide rights and remedies to workers

A diverse group of employers and ethical recruitment agencies, unions, anti-trafficking and migrants' rights organisations at EU and national level, are coming together to call on the EU to include targeted measures in the upcoming Quality Jobs Act to prevent and remediate recruitment-related abuses, centring protection and justice for workers.

A complex web of private labour intermediaries – including recruitment and temporary work agencies,[1] letterbox companies[2], sub-agents and informal brokers – is playing an increasingly significant role in facilitating the employment of a diverse mobile and migrant workforce across the EU internal market.[3] These intermediaries range from licensed, supervised agencies operating under national regulatory frameworks to the unlicensed end of the market, where letterbox companies, unlicensed agencies, sub-agents and informal brokers operate outside any oversight.

Where effective supervision and rights for workers are absent, the risk of recruitment-related abuse rises and abuses are least likely to be detected or remedied. This can even be the case among licensed actors; **a licence only protects workers when the competent authority can verify compliance, sanction breaches and provide remedies to impacted workers.**

In many cases, the role of these intermediaries serves to provide a low-cost and precarious workforce who are unable to exercise their labour and social rights and hold anyone accountable.[4] Recruitment-related abuses negatively impact workers and their families, fair employers and recruiters, and states, enabling undeclared work, exploitation and tax evasion.

Recruitment-related debts are also demonstrably linked to risks of debt bondage and forced labour.[5] The charging of recruitment fees and related costs to international migrant workers in forced labour generated US$5.6 billion (6.61 billion euros) in annual illegal profits globally.[6] Precarious or irregular residence status and risks of deportation are also key factors increasing exposure to abuse and exploitation, and compounding challenges in holding any actor in the supply chain accountable.

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[1] We make the distinction between agencies that provide a range of services to facilitate recruitment and employment, without entering into a direct employment relationship with the worker ('recruitment agencies'), and agencies that are the contractual employer and place the employee to work under the supervision of another organization/ business ('temporary work agencies'). These are broad categories, which encompass different types of agencies.

[2] Companies that only exist on paper, without meaningful activities, or at least not in the country of incorporation/ legal registration.

[3] To take just one subset of mobile and migrant workers, which is growing in complex subcontracting chains at times involving multiple intermediaries, in 2023, non-EU migrant workers accounted for around 20% of posted migrant workers in countries with available data, according to a HIVA-KU Leuven study prepared for the European Commission, in May 2025).

[4] To take just one indicator, according to Eurostat data, in 2025, 22% of declared non-EU migrant workers held temporary contracts, more than twice the rate among nationals. The percentage would be higher if undocumented workers were included in the data.

[5] See for example: A survey of more than 1,000 employment permit holders carried out by MRCI in Ireland found that over a third of people had paid a fee to their employer or to an agency to secure their job. Some 85 percent of people who paid recruitment fees reported facing exploitation and 74 percent reported experiencing severe exploitation. The average amount paid was 5,476 euros, with amounts ranging from 100 to 21,175 euros. See MRCI, Tied to exploitation: the experience of migrant workers in Ireland, 2026.

[6] ILO study on the economics of forced labour, 2024. This is 15 per cent of total annual illegal profits from international migrants in forced labour.

National governments have taken a range of measures, but these remain limited and piecemeal.[7] Likewise at EU level.[8]

There would be a strong EU-added value to build on the existing measures and the extensive international standards,[9] to take a more comprehensive and consistent approach across the bloc.

To promote quality jobs and a level playing field across the EU, EU co-legislators should adopt binding legal provisions and provide practical supports to better regulate labour intermediaries, strengthen the rights of workers and their access to justice along recruitment corridors.

The Quality Jobs Act and its implementation should include the following elements:

1. **Enumerate workers' rights - and mechanisms for their monitoring, enforcement and remedies - regarding common recruitment-related abuses.**
2. **Develop a framework of minimum standards for effective licensing of private intermediary agencies on national level and strengthening the role of public employment agencies.**
3. **Strengthen transparency and shared liability along labour supply chains, making all actors responsible for fair recruitment, labour rights and social security, and related remedies**. Workers should be able to claim back payments in full from any actor in the chain (NB. see note on the personal and household services sectors below). Between actors, liability should be allocated in proportion to each actor's role and degree of control, taking into account demonstrated and meaningful due diligence, without displacing any actor's liability for its own acts and omissions.
4. **Provide practical support measures, including:**
    - **Funding for NGOs and trade unions providing information and supports to migrant workers, including specific financial support for work facilitating access to remedies for labour rights violations and recruitment-related abuses.**
    - **Exchange of promising practices such as the provision of residence and work permits to exploited workers.**
    - **Supports to increase regular dialogue, coordination and cooperation between key actors in countries along recruitment corridors.**

[7] For examples of measures taken by national governments in the European Union, see L. Palumbo, Fair Recruitment to the EU: Regulation, Rights and Remedies, PICUM-FES, 2026. The ILO Forced Labour Observatory also national frameworks on prohibiting the charging of fees and costs from workers.

[8] The EU Temporary Agency Work Directive (2008/104/EC2) guarantees equal treatment for temporary agency workers and prohibits temporary work agencies from charging their employees recruitment fees, but it does not provide a comprehensive framework for regulating labour intermediaries.

[9] See in particular, the ILO standards on forced labour (C29, P29, C111, R203) that specifically require protection from abusive recruitment practices, C181 on Private Employment Agencies, General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs and Guide to private employment agencies; as well as IOM Montreal Recommendations on Recruitment: A Roadmap towards Better Regulation and Handbook for Government on Ethical Recruitment and Migrant worker Protection.

Further explanation

Common recruitment-related abuses include:

- the payment of recruitment fees and related costs in contradiction of ILO guidance and international labour standards;[10]
- document retention;
- misinformation, deception and fraud, in particular regarding salaries and working conditions, social security and residence and work permits for migrant workers;
- wage theft (underpayment, nonpayment, unlawful wage deductions);
- substandard, unsafe and exploitative working conditions;
- indecent accommodation;
- gender-based violence;
- threats and coercion.

ILO standards and guidance[11] and the EFFAT model directive provide a strong basis for the binding legal provisions that should be included in the Quality Jobs Act.

It will be essential that:

Scope

- The scope of provisions applies regardless of the workers' employment or residence/ migration status and location, at the time of the abuse occurring or reported/ uncovered.

- Different forms of labour intermediation are defined and covered as appropriate, including temporary-work agencies, private employment and recruitment agencies, placement services, subcontractors performing an equivalent labour-supply function, digital recruitment platforms,[12] and other natural or legal persons involved in recruiting, placing or supplying workers. Defining labour intermediation should prevent circumvention through contractual labels and cover intermediaries established outside the EU, where they recruit workers, directly or indirectly, for employment in the EU.

- Action on recruitment-related abuses is addressed as part of a broader strategy to promote decent work, fair working conditions and access to remedies for workers, regardless of employment or work permit status, and corporate sustainability and environmental and human rights due diligence.

Recruitment-related abuses

- Prohibitions of abuses are matched with corresponding rights for workers to repayment and compensation, as well as appropriate services and social inclusion measures. This requires safe, confidential, person-centred, accessible and effective complaints mechanisms and legal procedures, which shield workers from immigration enforcement or other negative consequences as a result of engaging with competent

[10] See in particular, ILO C181 and General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs.
[11] See in particular ILO C181 and Guide to private employment agencies (e.g. chapter 3 has information on critical elements of licensing and certification).
[12] It is worth noting that the recently adopted ILO Convention on decent work in the platform economy (C193) has a specific provision in article 20: "Each Member shall take measures to prevent abuses of, and provide adequate protection to, migrants and refugees in the course of their recruitment or engagement and their work as digital platform workers."

authorities. Compensation for workers should be prioritised, including through use of fines to compensate workers.

- Workers have a right to receive accurate, complete and verifiable information before accepting employment, travelling or incurring recruitment-related costs, in a language that they can understand.
- Specifically, regarding recruitment fees and related costs:
    - Intermediaries operating in the EU, whatever their country of establishment, are prohibited from charging workers any recruitment fee or related cost, in line with international standards.
    - For their recruitment partners in countries of origin, they should verify licensing status with the official authorities, identify any sub-agents involved, document all fees and related costs, and take corrective action where abuses are identified.
    - EU employers and clients should not use labour market intermediaries that charge workers, whatever their country of establishment.
    - Migrant workers should be able to claim and receive repayment of fees paid in contravention of international standards.
- Provisions on decent accommodation are included.
- National inspection authorities are enabled and resourced to monitor labour intermediaries[13] and enforce the provisions in a timely and effective way.

Accountability in supply chains

- Liability provisions take account of the personal and household services sector, where the final actor is a private household. Chain liability should not extend to a private household for the conduct of a subcontractor or intermediary, provided that the household engages only licensed intermediaries and declares the employment. The household's direct obligations as an employer remain unchanged. Organisations that assist private household employers to meet their obligations as employers, where the household remains responsible for paying salaries, should not be held liable for the household's wage and social contribution obligations, provided they carry out robust and documented due diligence. They remain liable for their own failures, negligence or contribution to breaches of labour or social rights. This does not affect workers' right to recover unpaid wages, social contributions or other entitlements from their employer, and Member States should ensure that workers can effectively recover them where a household employer fails to pay, including through wage guarantee mechanisms. Any exclusion from chain liability must be accompanied by effective enforcement mechanisms and clear responsibility for professional intermediaries and service providers.
- Measures are included to address the evidentiary challenges associated with complex labour supply chains and employment relationships, rebalancing the burden of proof to employers and agencies to demonstrate that rules have been followed. Demonstrated

[13] At the same time, authorities' powers must respect data protection and privacy. For more information, see: PICUM

due diligence is taken into account in allocating liability between actors for the conduct of another actor in the chain, without displacing any actor's liability for its own acts and omissions or workers' right to claim in full.

Licensing

- Minimum standards for licensing of intermediary agencies in the EU address:
    - Criteria for getting a license, appropriate to the type of agency.
    - Verification mechanisms before a license is issued.
    - Monitoring mechanisms, including transparency measures and the role of the labour inspection, and public national registers of licensed agencies, interconnected at EU level, showing licence status (active, pending, suspended or revoked) and confirmed sanctions.
    - Complaints mechanisms, that are safe, confidential, gender-sensitive and effective for all workers, ensuring workers can file complaints and receive remedy for violations of standards via administrative and legal procedures, with safeguards against immigration enforcement consequences. To be licensed, agencies should also designate an accountable contact person for complaints. Recourse to the agency is never a precondition for direct access to the authorities.
    - Consequences for non-compliance, for operating without a licence, and for employers who knowingly engage unlicensed intermediary agencies.
    - Remedies and compensation for workers.
    - Corresponding powers and resourcing of competent authorities and administrations.

Signed by:

International and European level organisations

1. European Federation for Services to Individuals (EFSI)
2. European Institute for Crime Prevention and Control, affiliated with the United Nations (HEUNI), Finland
3. La Strada International
4. PICUM

National and local level organisations

1. Arbeit und Leben Berlin – Brandenburg (Germany)
2. Association for Integration and Migration (SIMI) (Czechia)
3. Athens Home Services (Greece)
4. Consortium of Migrant Assisting Organizations (Czechia)
5. Domestic Workers' League of CSC-Brussels (Belgium)
6. EOS Workforce (Greece)
7. FairWork (The Netherlands)

8. FAIRWORK Belgium (Belgium)
9. German NGO Network against Trafficking in Human Beings (KOK) (Germany)
10. KISA – Equality, Support, Antiracism (Cyprus)
11. May 1st Labor Union (G1PS) (Lithuania)
12. Migrant Rights Centre Ireland (Ireland)
13. Movimiento de Mujeres Migrantes de Extremadura (Spain)
14. Mujeres Supervivientes (Spain)
15. Red Acoge
16. Sienos Grupė (Lithuania)
17. Worker Support Centre (UK)