







PHS Social Partners Joint Response for the Open Consultation on the Upcoming Gender Equality Strategy 2026–2030

Submitted by the EU PHS Social Partners: EFFE, EFSI, EFFAT, and UNI Europa

Brussels, 8 August 2025

Introduction

The Personal and Household Services (PHS) Social Partners—EFFAT, EFFE, EFSI, UNI Europa—welcome the European Commission's commitment to advance gender equality in Europe and globally through the upcoming **Gender Equality Strategy 2026–2030**.

The PHS sector, which employs over 10 million people across Europe, is central to addressing this matter, as women make up 90% of domestic workers on average across the 27 EU member states, representing nearly 7.5% of total female employment. This sector includes long-term care, childcare, cleaning, and other household services, all of which are vital to supporting families and enabling women to remain in the workforce, who still carry most of the unpaid care responsibilities in a household. However, the PHS workforce, many of whom work in precarious or undeclared conditions, often lacks adequate legal protection. Migrant women, in particular, face heightened risks of exploitation, exclusion from social protection, and the systemic undervaluation of their labour. Safeguarding the rights, dignity, and working conditions of domestic and home care workers must be a central pillar of the Gender Equality Strategy, as it is essential to advancing the overall situation of women.

Background

This consultation response is jointly submitted by the four European social partners in PHS:

• EFFAT (European Federation of Food, Agriculture and Tourism Trade Unions)

¹ Ghailani, D., Marlier, E., Baptista, I., Deruelle, T., Duri, I., Guio, A.-C., Kominou, K., Perista, P., and Spasova, S. (2024). Access for domestic workers to labour and social protection: An analysis of policies in 34 European countries. European Social Policy Analysis Network (ESPAN), Luxembourg: Publications Office of the European Union









- EFFE (European Federation for Family Employment and Home Care)
- EFSI (European Federation for Services to Individuals), and
- UNI Europa (European Services Workers Union).

Together, these organisations are mutually recognised social partners representing workers, employers, and user-employers, committed to developing a structured, professional, and rights-based PHS sector. They bring critical insights and proposals to help ensure that the strategy delivers on its promise of equality for all women, by starting with one of the most vulnerable and essential sectors in Europe today.

Despite progress in education and policy, women remain significantly underrepresented in the labour market. According to Eurofound, in 2023, the gender employment gap stood at 10.2 %, resulting in an estimated annual economic loss of € 390 billion.² The gender pay gap in the EU remains entrenched at 13%, and its effects accumulate over time, and in the PHS sector, it is even higher. This gap increases when women retire; indeed, women aged 65 and older received pensions that were, on average, 25.4% lower than men's, while more than one in five women aged 75 and above faced the risk of poverty or social exclusion.

The gaps in employment and pay are driven by several factors, including the concentration of women in specific sectors, the high rate of part-time or insecure jobs, and the unequal distribution of unpaid caregiving duties. On average, women spend more than twice as much time as men on unpaid care work, a burden that severely limits their economic independence, career progression, and work-life balance. The economic cost of this "unpaid care penalty", the potential earnings lost by women due to unpaid caregiving, is estimated to be at least € 242 billion annually.³

In the Personal and Household Services (PHS) sectors, where undeclared work is widespread, women and migrant workers face heightened risks of exploitation, poverty, and exclusion. Many are forced to reduce their working hours or to leave the workforce altogether due to care obligations. Currently, **around 7.7 million women in the EU are excluded from paid employment for this reason**. This situation is neither sustainable nor acceptable, as it perpetuates broader gender inequalities.⁴

To address these challenges, the EU needs to adopt a stronger commitment to an "equal earner, equal carer" model. This includes creating conditions that support women in rejoining the labour market or shifting from part-time to full-time roles. This

² Eurofound (2025), Mind the Gap - Press Release (https://www.mynewsdesk.com/eurofound/pressreleases/mind-the-gap-gender-employment-gap-cost-europe-over-390-euros-billion-in-2023-3373047)

³ European Parliament (2022), What if care work were recognised as a driver of sustainable growth?

⁴ Opinion of the European Committee of the Regions on the European Care Strategy (2023).









reality translates into an untapped economic potential that could be addressed through stronger policy commitments in the upcoming Gender Equality Strategy post-2025. It should be a priority recognising the PHS sector and its formalisation, while expanding access to quality, affordable care services, which are crucial steps in this direction.

Providing alternative support systems, such as well-structured and well-regulated PHS, can relieve the **burden of unpaid care**, **promote work-life balance**, **and open new employment pathways** for informal carers. At the same time, **professionalising and formalising employment and strengthening collective bargaining in the PHS sectors will enhance quality, strengthen the care workforce**, and ensure fair treatment and quality jobs for workers.

The EU PHS Social Partners firmly believe that investing in and formalising the PHS sector is central to achieving the EU's gender equality objectives. We call on the European Commission to fully integrate PHS into the Gender Equality Strategy 2026–2030 as a strategic sector to close employment and pay gaps, and to support women's full and equal participation in the labour market.

A Gender Equality Strategy That Works for All Women

A successful Gender Equality Strategy must address both sides of the gender gap, it must relieve women from the disproportionate burden of unpaid care work, and improve the working conditions of those, mostly women, employed in the PHS sectors. Without significant investment in PHS and formal recognition of its societal value, gender inequalities will persist.

By expanding access to high-quality, affordable care and household services, the EU can unlock women's full labour market potential and reduce the € 390 billion annual economic loss attributed to the gender employment gap. At the same time, ensuring decent and quality work in PHS will uplift millions of female workers, particularly the most vulnerable.

To meet this goal, the European Commission should apply an intersectional lens in its Gender Equality Strategy, addressing the compounded inequalities faced by women in the PHS sector, especially migrant workers. The 2024 PHS Employment Monitor shows their overrepresentation in precarious roles like live-in care, where 41% are migrants, 25% report inhumane conditions, and over 20% face food insecurity. These workers endure exploitative hours, poor labour protections, and limited social security, a reflection of discriminatory migration policies and the undervaluation of feminised labour.

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⁵ PHS Employment Monitor (2024) https://phs-monitor.eu/









This calls for the regularisation of undocumented workers, enforcement of equal treatment and decent work standards across all employment models, and greater public investment in affordable, accessible care. These steps are essential to reduce unpaid care burdens and build a well-recognised sector with quality jobs, fair pay, strong protections, and pathways for representation, ultimately ensuring better support for society as a whole.

Recommendations for the Gender Equality Strategy 2026–2030

The EU PHS Social Partners call on the European Commission to take the following actions in the upcoming strategy:

- 1. Recognise access to PHS and quality job for PHS workers as a key factor in increasing women's labour market participation, fostering economic independence, and enabling greater inclusion in social protection schemes, which in turn strengthens women's financial security and overall contribution to the economy. This would be essential for improving the situation of vulnerable groups, including single mothers and those at risk of poverty. By relieving women of the caregiving burden, access to PHS allows them to participate more fully in the workforce, unlocking their potential for personal, professional, and financial growth. As an essential sector, yet often overlooked, PHS should be integrated across EU policies from the Gender Equality Strategy to the Quality Jobs Roadmap, Anti-Poverty Strategy, Social Pillar Action Plan, and the upcoming Care Deal.
- 2. Promote accessible, high-quality, and affordable PHS to support work-life balance and boost quality employment for women, and formally recognise PHS work to combat the systemic devaluation of women labour in these sectors, and to ensure recognition and professionalisation of PHS in the EU. The European Commission should call on all Member States to ratify and implement the ILO Convention on Domestic Workers No. 189. Specifically, the European Commission should provide regular updates on its national implementation, closely liaise with the Council, the ILO, and PHS social partners, and provide multi-stakeholder fora to promote good practices for domestic work.⁶
- 3. Regularisation of migrant PHS workers. Approximately one in four PHS workers is a migrant, many of whom face exploitation due to a lack of adequate regularisation programmes and legal pathways. The EU and Member States should facilitate legal pathways to formalise the status of migrant PHS workers, recognise their skills, and provide access to quality jobs. In addition, effective

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⁶ European event to mark 10th anniversary of the ILO Domestic Workers Convention (2021) https://www.ilo.org/brussels/meetings-and-events/WCMS 797093/lang--en/index.htm

⁷ PHS Employment Monitor (2024) https://phs-monitor.eu/









regularisation programmes should be available to undocumented PHS workers to normalise their status without fear of reprisals, to obtain long-term residence permits, and ensure their effective access to socio-economic rights. This would not only ensure fair working conditions and protection for migrant women but also contribute to reducing gender inequalities by empowering these women, recognising their contributions, and promoting equal opportunities within the sectors.

- 4. Invest in skills development, training, and education to address labour shortages and meet evolving workforce needs. The lack of recognition for acquired experience and insufficient training opportunities exacerbates gender stereotypes in the PHS sectors. The EU should integrate PHS within the Union of Skills framework, ensuring professional recognition and fostering sector-specific education and training.
- 5. Invest and strengthen collective bargaining and social dialogue in the PHS sectors, where it remains critically low. This effort should be accompanied by strong support for social partners' capacity-building. Specifically, the EU should facilitate trade union access and organisation in the PHS sectors, as well as capacity-building programmes for employers' organisations to be strengthened and developed. Such initiatives will empower social partners to play a more effective role in tackling gender inequalities and closing the gender pay gap.
- 6. Combating sexual violence and harassment in the workplace, particularly gender-based violence. Given the unique nature of household-based employment, ensure the full implementation of the Istanbul Convention on preventing and combating violence against women and domestic violence. Additionally, the EU should call for Member States to ratify and effectively implement the ILO Violence and Harassment Convention No.190 and the ILO Recommendation 260, while adopting new EU policies that align with these international treaties to protect workers from all forms of violence and harassment. ⁸ Therefore, the Gender Equality Strategy should establish a framework to address gender-based domestic and third-party violence, including guidelines for member states to adopt national measures, and promote collective bargaining for paid leave, flexible work arrangements, and temporary protection against dismissal. In addition, considering the household-based nature of PHS work, third-party violence can be tackled through gender-based risk assessments, worker support, and clear reporting procedures. The strategy

⁸ ILO Recommendation 260 (2019)









should also raise awareness of the economic violence faced by women in the PHS sector.

Conclusion

The Gender Equality Strategy 2026–2030 offers a crucial opportunity to support women's empowerment and transform Europe's care economy. Recognising and investing in the PHS Sector is key to closing gender gaps and building a fairer, more resilient Europe.

The EU PHS Social Partners are ready to support the development and implementation of the strategy and work alongside EU institutions to ensure that its objectives deliver meaningful, lasting progress for women across Europe.

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EFFAT is the **European Federation of Food, Agriculture and Tourism Trade Unions**. As a European Trade Union Federation representing 120 national trade unions from 35 European countries, EFFAT defends the interests of more than 22 million workers employed along the food chain. EFFAT is a member of the ETUC and the European regional organisation of the IUF.

EFFE, the **European Federation for Family Employment & Homecare**, represents the interests of national stakeholders including social partners organisations operating in the field of direct employment. This model is characterised by a contractual work relationship between two private individuals, without any trading or profit-making objective.

EFSI, the **European Federation for Services to Individuals**, is the voice of the Personal and Household Services sector at European level, representing national associations, employers' organisations, PHS providers and companies involved in the development of personal and household services, and currently operating in 21 EU Member States.

<u>UNI-Europa</u> is the **European Trade Union Federation for 7 million service workers**. It speaks for the sectors that constitute the backbone of economic and social life in Europe.









Headquartered in the heart of Brussels, UNI Europa represents 272 national trade unions in 50 countries, including: Commerce, Banking Insurance and Central Banks, Gaming, Graphical and Packaging, Hair and Beauty, Information and Communication Technology Services, Media, Entertainment and Arts, Postal Services and Logistics, Private Care and Social Insurance, Industrial Cleaning and Private Security, Professional Sport and Leisure, Professionals/Managers and Temporary Agency Workers.