PRESS RELEASE

9 September 2026

TELEPERFORMANCE FORMALLY CALLED UPON TO PREVENT RISKS OF VIOLATIONS OF THE FUNDAMENTAL RIGHTS OF CONTENT MODERATORS AND AI WORKERS

The CGT-FAPT (Fédération nationale des salariés du secteur des activités postales et de télécommunication de la CGT), together with the **Data Labelers Association** and **The Oversight Lab**, have formally called upon **TELEPERFORMANCE SE**, the parent company of the multinational TP Group, to substantially revise its duty of vigilance plan in order **to better protect the thousands of workers employed across the TP Group, in Kenya and around the world, in AI data annotation and content moderation for social media platforms.**

TELEPERFORMANCE SE is the parent company of the TP Group, one of the world's leading providers of outsourced customer experience and digital business services. Under the French Duty of Vigilance Law, TELEPERFORMANCE SE is required to identify and prevent serious adverse impacts on human rights, health and safety arising from its operations worldwide.

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Field investigations document serious risks faced by data workers

The action was announced today in Geneva by the signatory organisations at the **International Labour Organization (ILO)**, during a conference organised by the International Network of Digital Labour on labour issues in AI value chains. The conference follows the adoption of ILO Convention No. 193 on decent work in the platform economy, in June 2026. This is the first international labour standard devoted to the platform economy.

This action is the outcome of **interdisciplinary action research** carried out over several years by labour sociologists, legal scholars, lawyers and civil society organisations **on the working conditions of data workers.** The term refers to people performing a wide range of tasks, including the production, preparation, annotation, validation, verification, moderation and evaluation of data and content, that are necessary for the development, training and operation of the digital platforms and AI models we use every day.

The action is based in particular on **investigations conducted in recent months by the signatory organisations among current and former TP employees in Nairobi** working in **online content moderation for a social media platform.** These investigations have documented **serious risks to the fundamental rights, health and safety of data workers** employed by the multinational group. These findings are consistent with a growing body of

scientific research[1], journalistic investigations[2] and reports by non-governmental organisations[3] concerning working conditions across AI value chains.

The risks and alleged harms documented in this body of work have already given rise to several legal proceedings involving companies belonging to the TP Group, including in Kenya. They are now also the subject of a pre-litigation process in France under the French Duty of Vigilance Law.

This is the first formal notice of its kind in Europe targeting the parent company of a major actor in AI value chains.

The formal notice alleges that TELEPERFORMANCE SE has **failed to comply with its obligations under French duty of vigilance law,** insofar as its vigilance plan does not adequately identify, assess and prevent certain serious risks to the fundamental rights, health and safety of data workers.

These include risks relating to the immigration status of migrant workers who allegedly worked without the required permits; alleged failures to remit, or delays in remitting, social security contributions deducted from wages; inadequate grievance mechanisms; and particularly demanding working conditions for content moderators. According to the signatory organisations, these shortcomings are liable to aggravate the psychological harm associated with content moderation work.

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Migrant workers facing heightened administrative vulnerability

A significant proportion of TP employees in Nairobi are **migrant workers from other African countries.**

Several workers interviewed said that they only discovered the true nature of the work they would be performing after they had been recruited.

The documents and testimonies collected also point to **irregularities concerning their entry into and residence in Kenya.** Some workers report that they began working without the required permit and remained in this situation for several months, or even longer, while their regularisation depended on administrative steps to be taken by their employer.

According to the testimonies collected, **this situation reportedly had concrete consequences for workers' daily lives and freedom of movement.** Some workers said they refrained from leaving Kenya to visit their families because they feared being unable to re-enter the country or being detained because of their immigration status.

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[1] A. Casilli, *Waiting for Robots. The Hidden Hands of Automation*, Chicago University Press, 2025.

[2] See in particular investigations published by The Bureau of Investigative Journalism, in collaboration with international publications Time and The Guardian, on the working conditions of content moderators employed by TELEPERFORMANCE in Colombia (2022) and Ghana (2025). See also the investigation published by openDemocracy in June 2026 on migrant workers employed by TELEPERFORMANCE in Nairobi, "The life and death of Ladi Olubunmi, 41, TikTok moderator".

[3] Equidem, *Scroll. Click. Suffer: The Hidden Human Cost of Content Moderation and Data Labelling*, 2025, based on interviews with 113 data workers in Colombia, Ghana, Kenya and the Philippines, including 15 employees of TP's Colombian subsidiary.

Several workers also alleged failures to remit, or delays in remitting, social security contributions deducted from workers' wages, in some cases preventing them and their families from accessing healthcare coverage.

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Thousands of violent or disturbing pieces of content reviewed every day: protection measures deemed insufficient

Content moderation, as well as certain data-preparation activities used to train AI systems, can entail **prolonged exposure to violent or disturbing content**.

Content moderators are required to review content uploaded to social media platforms and determine whether it breaches the platform's internal policies. These policies are often highly detailed and nuanced. Once logged into their workstation, **moderators receive a stream of pieces of content (in particular videos) that they must review, label and classify.** According to the workers interviewed, the average processing time may be approximately **45-60 seconds per item**.

The moderators interviewed said that prolonged exposure to disturbing content, combined with working conditions they described as particularly demanding, had **significant effects on their well-being.**

They reported, among other things:

- sleep disorders;
- physical and emotional exhaustion;
- depressive episodes;
- addictive behaviours;
- social isolation;
- difficulties in intimate and sexual relationships;
- an inability to detach themselves from images seen at work.

According to the testimonies collected, the **psychological support provided by the employer appears insufficient in light of these risks**. Workers explained that productivity targets sometimes make it difficult for them to leave their workstation to consult the psychologist available on site, while some also expressed concerns about the confidentiality of the support system.

Most importantly, the trauma does not necessarily end when the employment contract does. Some former workers report that **these effects persisted for several months or even years after the end of their employment.** Some also state that they had to continue psychotherapy for several years, at their own expense.

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Fear of losing job for speaking out

The testimonies collected also point to a **climate of fear and self-censorship**.

Some workers approached at TP's Nairobi site agreed to speak only on condition of anonymity, while others declined to participate because they feared losing their jobs or facing retaliation.

Several workers also reported concerns that **challenging their working conditions** or **engaging in trade union activities** could have **adverse consequences** for the continuation of their employment.

TELEPERFORMANCE SE has entered into a global agreement with UNI Global Union on freedom of association, and since April 2025, The Communication Workers Union of Kenya (COWU-K) has been officially recognised as representing frontline workers in TP's Kenyan operations[4]. Several workers interviewed nevertheless said that these commitments had not materially changed their ability to assert their rights without fear of professional repercussions.

Several workers further stated that their contracts were not renewed after they had participated in collective initiatives, including initiatives aimed at raising concerns about their working conditions following the death in 2025 of their colleague Ladi Anzaki Olubunmi[5].

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The duty of vigilance must also address the specific risks of data work **in AI supply chains**

According to the signatory organisations, the vigilance plan published by TELEPERFORMANCE SE in 2026 does not sufficiently address the specific risks faced by data workers across the TP Group's value chain.

The formal notice therefore calls on TELEPERFORMANCE SE to **substantially revise its duty of vigilance plan** and to take concrete measures across its direct and indirect subsidiaries, as well as with business partners with which it maintains established commercial relationships, in order to **better prevent serious adverse impacts and strengthen the protection of data workers' rights, health and safety.**

More specifically, the signatory organisations call on TELEPERFORMANCE SE to:

1. **Identify precisely the risks faced by data workers** across the Group's different activities and subsidiaries and rank them according to their severity.
2. **Regularly assess conditions on the ground**, in consultation with representative trade unions, with particular attention to data annotation and online content moderation activities.
3. **Adopt structural and organisational measures to prevent harm and protect data workers**, including by:

    - ensuring decent wages, transparent recruitment, respect for migrant workers' rights, and trade union and collective freedoms;
    - reducing exposure to violent and traumatic content and adapting work organisation to better protect workers' health;

[4] As the Agreement expired in May 2026, its renewal remains uncertain: UNI Global now states that TP is "walking away" from the agreement and, on 29 July 2026, wrote to more than 80 major investors urging them to intervene and call on TP to renew it (the letter is available on the UNI Global website).

[5] openDemocracy, « The life and death of Ladi Olubunmi, 41, Tik tok moderator »), 2026.

- guaranteeing effective, independent and specialised psychological support that is genuinely accessible, including after employment ends where necessary.
- bringing adverse impacts to an end when they occur and providing remedy to workers who have suffered harm;
- engaging with the Group's corporate clients, including major social media and AI platforms, so that commercial requirements do not lead to deterioration in workers' health, safety or fundamental rights.

4. **Establish a genuinely accessible grievance mechanism,** developed with representative trade unions, enabling workers to report adverse impacts without fear of retaliation.
5. **Verify that the measures adopted are effective,** through monitoring mechanisms capable of measuring results and strengthening measures where necessary.

TELEPERFORMANCE SE now has **three months** to comply with its obligations.

Failing a satisfactory response, the signatory organisations may bring proceedings before the **Paris Judicial Court**.

About the signatory organisations

The CGT-FAPT (The National Federation of Employees in the Postal and Telecommunications Sectors of the CGT) is a trade union federation whose purpose is to study and defend the individual and collective material and moral rights and interests of employees, unemployed workers and retirees in companies in the sector, including those falling within the postal and telecommunications branches (www.cgt-fapt.fr).

Romain Boillon, Secretary General of CGT-FAPT, said: *"This action is essential for our trade union. The duty of vigilance is a powerful tool for requiring multinational companies in the postal and telecommunications sectors to anticipate the transformations driven by AI, prevent social dumping, and guarantee the fundamental rights, health and safety of all workers across the value chain."*

Data Labelers Association is a Kenyan organisation working for the recognition of data workers and the protection of their rights, physical and psychological health, and well-being around the world (www.datalabelers.org).

According to **Ephantus Kanyugi**, **Vice president and programs lead for DLA**: *"The question is no longer whether multinational companies know what happens within their global operations, but whether they are prepared to take responsibility for it. Corporate due diligence cannot exist only on paper, in sustainability reports, or in carefully crafted public commitments. Its true meaning is tested where corporate power meets human consequence. A company's responsibility must be measured not by the principles it declares, but by what it does when the rights and dignity of people within its value chain are at risk. Responsibility that disappears when harm crosses a border was never responsibility at all."*

The Oversight Lab works with African communities to build a tech future that is anchored on human rights. The Lab does this through strategic research and litigation. The Lab supports ongoing proceedings in Kenya in which Majorel Kenya Limited, now part of the TP Group, is a respondent alongside Meta and Sama in a case brought by former Facebook content moderators who allege, among other things, intentional harm to their mental health and breaches of immigration rules.

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The Oversight Lab observes that: *"the precarity of data workers is at an all-time high given the current mad rush for market domination by AI companies. Protecting workers in this precarity requires the collective use of national and cross-border legal and administrative mechanisms such as this".*

Executive Director of The Lab added: *"We will not relent in our fight for the protection of data workers from exploitation. AI models and systems are being built on the broken backs and minds of African youth, and we all have a responsibility to put an end to that exploitation".*

About the partners

Intérêt à Agir is a collective of lawyers, legal scholars and researchers specialising in strategic litigation. Without being a signatory to the present formal notice, Intérêt à Agir supported the signatory organisations in its preparation by providing methodological and legal assistance (www.interetaagir.org).

This action forms part of **AI-WORLd**, an interdisciplinary action-research initiative on working conditions across AI value chains, led by Intérêt à Agir in partnership with DipLab, and supported by the **European AI & Society Fund** and the **Digital Freedom Fund.**

In 2024, Intérêt à Agir had already warned of the failure of vigilance plans to adequately address the risks to the fundamental rights of data workers who train AI services widely deployed in France[6].

> ***According to Luca d'Ambrosio and Baptiste Delmas, coordinators of the AI-WORLd programme****: "The often arduous working conditions of the data workers who power AI can no longer remain invisible. French law now provides a pathway for requiring companies to prevent violations of their fundamental rights. With the transposition of the European Corporate Sustainability Due Diligence Directive, this pathway may become available in other Member States and contribute to the emergence, at European level, of effective corporate accountability across AI value chains"*

DiPLab (Digital Platform Labor) is an interdisciplinary research group established in 2019 at Institut Polytechnique de Paris. It brings together social sciences, computer science, linguistics, law and economics to study digital platforms, AI and the future of work. Its members' research spans more than 30 countries. DiPLab co-organises the international conferences of the International Network on Digital Labour (INDL) (www.diplab.eu).

> "*Studying the production chains of artificial intelligence is no longer enough*" explains **Antonio Casilli**, **Director of DiPLab and Professor at the Institut Polytechnique de Paris**. "*Major companies must now confront their own responsibilities and the impact they have on labor, on people, and on society. 'Ethical AI' cannot be reduced to vague principles or voluntary charters. Ethics begins with one concrete requirement: complying with the law.*"

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[6] https://www.interetaagir.org/intelligence-artificielle-et-devoir-de-vigilance-il-y-a-interet-a-agir/