

**Summary of  
DOCTORAL DISSERTATION**



**Title of Dissertation**

**Telework: Legislative, Jurisdictional, and HRM  
Challenges.**

**A Comparative Analytical Study in Hungary, the Netherlands, the UAE and Qatar.**

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## Table of Contents

1. Introduction .....	2
2. Research Methodology .....	3
3. Research Aims and Objectives.....	4
4. Research Questions .....	4
5. Telework and the Transformation of Employment Relationships .....	5
6. Challenges and Transformations of the (Typical) Standard Employment Relationship .....	6
7. Atypical Employment and Emerging Challenges in Legal and HRM Contexts.....	7
8. The Concept of Telework: Legal Definition, Comparative Approaches, and the Transformation of Subordination .....	7
9. Telework and HRM challenges and mitigation strategies.....	9
9. Brief Summary .....	11
10. List of Publications.....	12

# 1. Introduction

Telework has become an increasingly significant feature of modern labour markets as technological developments allow work to be performed outside the traditional workplace. While telework is widely promoted as a flexible and efficient work arrangement, its rapid expansion has exposed legal, jurisdictional, and human resource management challenges that existing labour law frameworks do not adequately address. In many legal systems, telework continues to be regulated through rules designed for standard employment relationships, creating uncertainty regarding workers' rights and employers' obligations.

The importance of this research lies in the fact that many employers, despite existing legal frameworks, still confuse telework with similar forms of work, such as remote, home-based, or hybrid arrangements. Many countries, even with strong economies, have not adequately regulated telework in their legislation. The COVID-19 pandemic exposed numerous legislative gaps and weaknesses in adapting employment law to telework. Legal issues related to telework classification, subordination, and autonomy remain unresolved. Additionally, human resource management faces challenges in balancing the employer's right to supervise with the employee's right to privacy and protection against unfair dismissal.

This dissertation examines telework as an atypical form of employment and analyses the legal, jurisdictional, and human resource management challenges arising from its implementation. The study is based on the premise that current telework regulations do not sufficiently protect teleworkers' rights or adequately address HRM-related challenges, particularly in cross-border and remote work contexts.

The first chapter presents the background, context, and rationale of the dissertation. It introduces telework within the broader transformation of labour markets and explains the research problem, research questions, objectives, and methodology of the study.

The second chapter examines the concept of the standard employment relationship and the emergence of atypical forms of work. It analyses the legal characteristics of traditional employment and explores how economic, technological, and organisational changes have challenged this model, leading to the growth of telework and other non-standard work arrangements.

The third chapter focuses on the legal nature of the telework employment relationship. It analyses the concept and development of telework, its distinguishing features, and its legal

classification. The chapter further examines issues of subordination, control, autonomy, and jurisdiction, with particular attention to cross-border telework and comparative legal approaches in Hungary, the Netherlands, the United Arab Emirates, and Qatar.

The fourth chapter examines the impact of telework on human resource management. It analyses the main HRM challenges associated with telework, including performance management, communication, employee well-being, occupational health and safety, and work–life balance. The chapter also evaluates existing legal and organisational responses and discusses possible mitigation strategies in the selected countries.

The fifth chapter presents an empirical study based on data collection. It explains the research design and methodology used to collect primary data through a structured questionnaire distributed to employees working remotely. The chapter analyses the survey results in order to assess the practical impact of HRM challenges in telework arrangements and to support the legal and theoretical findings of the dissertation.

The dissertation concludes by summarising the main findings of the research and presenting recommendations to improve telework regulation, clarify jurisdictional issues, and enhance human resource management practices in remote work environments.

## 2. Research Methodology

This dissertation was created using both a doctrinal and analytical method, serving to address the legislative, jurisdictional and HRM problems that arise from telework. Since telework differs from many other jobs, we use a multimethod approach that combines legal analysis with an examination of HR practices. To provide a thorough view of changes in telework, the method used offers both a wide and a deep understanding in Hungary, the Netherlands, Qatar, and the UAE.

The doctrinal component of the research involves the systematic study of national legislation, international agreements, regulations, and case law related to telework in these four jurisdictions. This allows for identifying gaps, inconsistencies, and jurisdictional challenges in existing legal frameworks, as well as for a comparative assessment of regulatory approaches.

The HRM component is supported by primary data collection via a structured questionnaire distributed to remote employees. The survey captures practical insights on employee supervision, work–life balance, occupational health and safety, privacy, and protection against

unfair dismissal. The sample includes diverse sectors, job types, and employment arrangements to ensure the reliability and generalisability of the findings.

By integrating doctrinal legal analysis with empirical HRM data, the study provides a comprehensive understanding of telework governance. A comparative analysis highlights differences and similarities across the four countries and examines how legislation and organisational practices affect the implementation and management of telework. Quantitative and qualitative analyses of survey data support the doctrinal findings and provide evidence-based recommendations for improving telework regulation and HRM practices.

### 3. Research Aims and Objectives

The dissertation primarily aims to compare regulations, legal contexts, and HRM practices for telework across four countries: Hungary, the Netherlands, Qatar, and the UAE. Therefore, the purposes are:

- To outline the borders of telework compared to other types of atypical jobs.
- An analysis and comparison of the rules and laws related to telework within Hungary, the Netherlands, the UAE and Qatar.
- To pinpoint and analyse problems related to the rules of different areas that affect telework.
- To understand the problems and ways organisations manage teleworking.
- To understand how well the principles of teleworking and employment are supported by the law and what outcomes result for the organisation.
- To devise recommendations for the successful management of remotely working teams.

### 4. Research Questions

The study addresses the research questions throughout.

- What do the countries Hungary, the Netherlands, Qatar and the UAE say about the concept of telework?
- How are telework practices regulated using different laws and are they in accordance with European and international regulations?
- What problems related to borders and jurisdictions are created by allowing employees to work remotely?

- What techniques do business organisations use for teleworking, and what negatives and positives have been identified in the chosen nations?
- What measures are in place now to look after teleworkers while meeting organisational targets?
- In what ways should telework rules be aligned, and how can HRM be improved?

## 5. Telework and the Transformation of Employment Relationships

Global work is rapidly evolving due to technological advancement, economic changes, and shifting societal expectations. Employers and employees are increasingly adopting new work arrangements, challenging traditional legal, social, and organisational systems. Telework, also known as remote working, has grown substantially due to continuous advancements in ICT. What was once a rare practice has now become a widely accepted employment arrangement worldwide. Traditional labour laws and social policies are based on the standard employment relationship, which typically involves full-time, permanent employment at a set location under continuous supervision. This framework provides employees with income protection, social insurance, safe workplaces, collective bargaining rights, and overall legal safeguards. Such protections have historically contributed to social stability and structured workplaces.

However, traditional employment is increasingly being replaced or supplemented by atypical work arrangements, including part-time, fixed-term, temporary, freelance, gig economy, and telework positions. These arrangements often provide less security, fewer benefits, and limited social protections, raising questions about labour rights, proper social policies, and employer expectations. Telework, in particular, challenges the conventional organisation of work by removing employees from a fixed workplace and schedule, requiring new approaches to supervision, accountability, and rights protection. The COVID-19 pandemic accelerated telework adoption, revealing both opportunities and difficulties in managing remote work and prompting authorities to reexamine employment regulations. Within the European Union, telework regulation has evolved through laws, social partner agreements, and judicial decisions. The 2002 European Framework Agreement on Telework outlines core principles such as workers' rights and occupational safety. EU directives on working time, non-discrimination, data protection, and health and safety also apply to teleworkers. Nonetheless, enforcement varies across member states. Hungary and the Netherlands integrate telework rules into broader labour legislation, while also relying on collective bargaining and tripartite

agreements, whereas Qatar and the UAE are still developing telework policies amid expatriate labour systems and the kafala sponsorship framework. These countries face challenges such as weak worker protections, difficulties with regulatory enforcement, and jurisdictional ambiguity. This comparative perspective highlights the importance of examining telework across different legal, economic, and cultural contexts to identify systemic challenges and inform policy.

## 6. Challenges and Transformations of the (Typical) Standard Employment Relationship

Before delving into the core research topic of remote work, it was necessary to examine the emergence of traditional employment relationships in general, specifically typical employment relationships, the challenges these relationships faced, and the transformations they underwent, leading to new forms of non-traditional work. It was then essential to review the labour laws of the four countries included in the research sample and the extent to which they regulate non-traditional employment relationships. Significant differences were found, particularly in countries outside the European Union, such as Qatar and the UAE. The research concluded that there are legislative shortcomings and judicial inconsistencies, not merely legal loopholes, as is the case in EU countries.

The standard employment relationship, historically characterised by full-time, permanent contracts with a single employer, remains the dominant model in most labour markets. Its defining features—personal subordination of the employee, mutual obligations, income security, and work performed at the employer’s premises—have long ensured stability for workers and predictability for organisations. Standard workers benefit from comprehensive legal and social protections, including statutory labour rights, collective agreements, health and safety regulations, and social insurance. These protections have contributed to societal stability, secure income, and strong economic participation. However, internal and external challenges increasingly undermine these traditional features. Internally, the gradual erosion of job security, the reclassification of workers as independent contractors or agency employees, and the rise of remote work disrupt the conventional employer-employee hierarchy and the mutual obligations it entails. Technological advancements further create disparities among employees, as those less proficient in digital tools face heightened job insecurity and limited advancement opportunities. Externally, globalisation and labour-market flexibilisation have facilitated the outsourcing of stable jobs to lower-cost regions, the proliferation of part-time, temporary, and

gig work, and the growing dominance of non-standard employment. These trends erode the stability and protections of standard employment, leading to fragmented work histories, inconsistent income, and gaps in access to social security benefits. For instance, in several EU Member States, at least half of all temporary workers risk losing eligibility for unemployment benefits, with this figure exceeding 70% in the UK, Slovakia, Estonia, and Latvia. As a result, policymakers, employers, and labour organisations face pressing challenges in maintaining security, fairness, and social protection within the standard employment model.

## 7. Atypical Employment and Emerging Challenges in Legal and HRM Contexts

Atypical employment encompasses part-time work, fixed-term contracts, agency work, freelancing, gig work, and telework, all of which represent deviations from the standard model. These arrangements generally offer greater flexibility but provide less stability, reduced legal protection, and limited access to social security benefits. Telework, in particular, exemplifies the complexities of atypical employment, as work is performed remotely using information and communication technologies, challenging traditional notions of supervision, control, and workplace presence. Legal and HRM issues arise from unclear employment status classification, ambiguity in rights and obligations, and difficulties in monitoring and ensuring compliance. Cross-border employment exacerbates jurisdictional uncertainty, creating gaps in social security, taxation, and labour rights enforcement. HRM challenges include maintaining employee engagement, overseeing performance, ensuring occupational health and safety, and supporting work-life balance in dispersed teams. National examples illustrate contrasting approaches: Hungary and the Netherlands have implemented regulatory measures to integrate atypical workers into social security schemes, while Qatar and the UAE face unique constraints due to the kafala system and reliance on expatriate labour, with telework regulations still in development. Overall, atypical employment raises critical questions about income security, job stability, social protection, and effective management practices, highlighting the need for adaptive legislation and innovative HRM strategies that protect workers while accommodating the flexibility and digitalisation of modern labour markets.

## 8. The Concept of Telework: Legal Definition, Comparative Approaches, and the Transformation of Subordination

Using a critical analytical approach, this dissertation examines the concept of telework as a non-traditional form of work that has recently emerged and gained significant traction in the labour market. Initially, technological advancements enabled some workers to perform their

duties outside company premises, and this model subsequently spread widely during the COVID-19 pandemic. This development was accompanied by numerous legislative challenges, revealing legal gaps and conceptual confusion between these models and others.

Therefore, it was essential to review the basic definitions of telework, beginning with its initial emergence and progressing to the European Framework Agreement on Telework. This document represents an agreement between European social partners (such as the European Trade Union Confederation (ETUC), the European Union Confederation of Labour (UECOM), and the European Employers' Organisation (EUEC) and the European Commission on Telework (CEEP). It establishes the fundamental guidelines for regulating telework within the framework of European labour law, defining telework as a recognised form of employment arrangement whereby an employee, under an employment contract, can use digital communication tools to perform tasks that would normally be carried out at the employer's premises, but which they perform regularly from another location. Following this, the study examines the reality of telework in the countries included in the research sample, beginning with Hungary, which recognised this model and incorporated it into its labour law, making it one of the pioneering countries in this field. Hungary subsequently made some legislative amendments. The study then moves on to the Netherlands, which is considered one of the countries with the highest rates of remote work adoption.

Outside the European Union, countries with strong economic and legislative structures, such as the United Arab Emirates and Qatar—which naturally attract workers from all over the world across various sectors—have a relatively new concept of remote work. This differs from its understanding in the European Union or the United States, for example. Federal Labour Law No. 33 in the UAE, primarily applicable to the private sector, does not regulate remote work but merely mentions the possibility of remote work contracts. As for the law applicable to the public sector, it treats remote work as a perk granted to employees as a form of reward, subject to several conditions. This indicates a lack of understanding of this work model.

In addition to the above, the telework contract raises legal issues concerning the subordination relationship that characterises employment contracts in general. It is known that the relationship of subordination in traditional work is represented by the employer's authority to supervise and direct, which cannot be achieved in this form in remote work. Therefore, it was necessary to address this issue and determine the type of subordination, whether it exists, and

whether it takes a special form in the telework pattern, as some jurists have described it as technological subordination.

## 9. Telework and HRM challenges and mitigation strategies

The rise of telework from a niche practice to a widespread mode of employment fundamentally challenges traditional Human Resource Management (HRM) systems and labour governance. This shift necessitates a critical reorientation of HRM practices, particularly concerning worker rights, managerial control, and maintaining workplace harmony. The complexity of HRM in a telework environment stems from its organic integration with legal frameworks, digital infrastructure, and employee psychological well-being. Core issues include the inability to monitor performance conventionally, the risk of social isolation, blurred work-life boundaries, and heightened cybersecurity threats.

A comparative study of telework-related HRM issues in four selected jurisdictions—Hungary, the Netherlands, Qatar, and the United Arab Emirates (UAE)—reveals that problems and mitigation strategies differ significantly across these jurisdictions, reflecting their distinct geopolitical and socio-economic conditions. The study highlights how HRM mediates between legal regulation and organisational policy to adapt to new telework norms. The primary HRM pillars impacted by telework—performance appraisal, employee engagement, and risk management—are treated as dependent variables in this comparative analysis.

In the Netherlands, telework integration is advanced and often viewed as a pioneering model. Strong national regulations, such as the Flexible Work Act and the Balanced Labour Market Act, provide a robust legal foundation. Key HRM issues, however, include the lack of independent "Right to Disconnect" legislation (though it is supported by cultural norms and collective labour agreements/CLAs), which leads to digital presenteeism and mental fatigue. Dutch HRM focuses intensely on equal treatment and inclusion, ensuring remote employees are not disadvantaged in promotions or development. A significant challenge is balancing the strict privacy protections under the GDPR and the Dutch Data Protection Authority with the employer's need for productivity and security, while heavily restricting electronic surveillance. The adoption of the Results-Only Work Environment (ROWE) model emphasises outcomes over logged hours, fostering trust and independence.

Hungary has a hybrid regime with mature legal frameworks compared to many Eastern European nations, though challenges persist. The legislative environment permits employees

to use company equipment at home. HRM dilemmas revolve around implementing clear, consistent, and productive practices beyond large multinational businesses. Specific issues include ambiguity regarding employer liability for Occupational Health and Safety (OHS) in home offices and a compliance gap in smaller enterprises. Cost allocation and reimbursement for teleworking expenses (like utilities) are largely left to employer discretion, leading to inconsistency and confusion.

In the Gulf monarchies, the legal and structural environments are distinct. Qatar lacks a specific statutory policy for telework, forcing HR professionals to rely on broader policies meant for fixed-location work. This creates significant uncertainty regarding enforcing working hours, defining safety requirements beyond the physical premises, and establishing clear disciplinary channels for remote issues. The remnants of the Kafala sponsorship system, although undergoing reform, continue to complicate the voluntariness of telework agreements, especially for expatriate workers. Telework opportunities are often restricted to higher-skilled professions, exacerbating the digital divide. Mitigation in Qatar requires transitioning from reactive adjustments to structural policy reform, updating the labour code to explicitly address telework, and ensuring compliance training.

The UAE has been more proactive, formally recognising "Remote Work" through Federal Decree Law No. 33 of 2021. Governmental initiatives, such as the Dubai Remote Work Visa and the promotion of remote work in public institutions, indicate a strategic focus on digital transformation. However, the application of these policies is inconsistent across the private sector and free zones. A major challenge is the two-tier system: high-skilled expatriates gain flexible options while low-skilled migrant workers are systematically excluded. Contractual ambiguity persists, as older contracts often predate new telework legislation, forcing HR departments to create ad hoc policies. There are also concerns about surveillance and employee well-being, given an evolving data protection framework that requires HR to balance control with ethics. The UAE's Hybrid Work Charter is an example of institutional clarity and strategic planning to navigate the future of work.

Across all jurisdictions, three crucial HRM areas are affected:

- Performance Appraisal: Telework necessitates a shift from measuring presence to measuring results (e.g., ROWE model).

- **Employee Engagement:** Challenges include social isolation, digital fatigue, and loss of boundaries. Strategies involve implementing wellness programs, promoting the right to disconnect, and fostering a positive remote culture.
- **Compliance and Risk Assessment:** This involves navigating OHS responsibilities in the home setting, ensuring data protection (especially under GDPR in the EU), and managing cybersecurity threats.

Mitigation strategies must be holistic, covering policy, organisational best practices, and country-specific interventions. Policy interventions include enacting explicit laws on the "right to disconnect" and OHS in telework, and modernising data protection laws to regulate digital monitoring. Organisational strategies focus on clear contractual agreements, investing in digital tools and infrastructure, and training managers in digital leadership and virtual communication.

Looking forward, the future of telework is tied to AI and automation, which will reshape HRM functions via predictive analytics and real-time tracking. HR departments must proactively establish ethical AI guidelines, transparent data governance, and fairness audits to prevent algorithmic bias and protect privacy.

Ultimately, ensuring HRM readiness requires a unified model assessing five dimensions: Legal Readiness, Technological Readiness, Managerial Readiness, Cultural Readiness (promoting trust and inclusivity), and Employee Readiness (training in remote work ethics and providing support). Telework's growing relevance demands that HRM systems evolve to manage people, performance, and compliance globally in a flexible, inclusive, and ethical manner.

## 9. Brief Summary

The author argues that telework is no longer a passing organisational phenomenon or a mere job privilege, but rather a structural transformation that is legally and administratively reshaping the traditional employment relationship. He contends that existing legal frameworks, based on the standard employment relationship model, are no longer capable of accommodating the specificities of remote work, including subordination, oversight, social protection, and jurisdictional boundaries.

He further argues that human resource management has become the central player in bridging the gap between legal texts and practical application, bearing the burden of reconciling the employer's right to supervision and control with the employee's rights to privacy, occupational health, and work-life balance. The author emphasises that the challenges are not uniform but

vary across legal, economic, and cultural contexts, as clearly demonstrated by comparisons between European countries (Hungary and the Netherlands) and Gulf countries (Qatar and the UAE).

At the heart of the argument, the author contends that the success of remote work requires a new integrated model based on updating legislation, developing HRM practices, and adopting modern ethical and technical standards, ensuring flexibility without sacrificing legal protection and job fairness, especially in light of digital transformation and the increasing reliance on artificial intelligence.

## 10. List of Publications

- **Legal Frameworks and Gaps in Telework: Impact on HR, Compliance, and Business Governance**  
Global Interdisciplinary Perspectives 2025 1(2)pp12-19, eISSN: 3122-7120-  
DOI:10.64229/48cn0a07-<https://gip.cultechpub.com/index.php/gip>
- **Comparative Perspectives on Human Resource Management in the Era of Telework: Legal, Cultural, and Strategic Challenges in Hungary, the Netherlands, Qatar, and the United Arab Emirates**  
Journal of Law and Governance JLG 2025,1(2),pp9-18 eISSN: 3120-3841-  
DOI:10.64229/qtbz8g53- <https://jlg.cultechpub.com/index.php/jlg>
- **Platform Work: Concept, Legal Challenges, and Worker Protections in the EU**  
PÉCSI MUNKAJOGI KÖZLEMÉNYEK (2026)
- **From Stability to Flexibility: The Evolution of Employment Relationships in the 21st Century.**  
PÉCSI MUNKAJOGI KÖZLEMÉNYEK (1789-7637 3004-1821): 17 1-2 pp 127-148 (2024)
- **The Kafala Sponsorship System in the GCC Countries: A Comparative Study among the GCC Countries**  
PÉCSI MUNKAJOGI KÖZLEMÉNYEK (1789-7637 3004-1821): 17 1-2 pp 62-74 (2021)
- **The Survival of Sharia Islamic Divorce Law in the Syrian and Egyptian Personal Status Laws**  
DÍKÉ: A MÁRKUS DEZSŐ ÖSSZEHAONLÍTÓ JOGTÖRTÉNETI KUTATÓCSOPORT FOLYÓIRATA ( 2631-1232): 5 1 pp 190-200 (2021)

العمل عن بُعد بين الواقع العملي والفراغ التشريعي في قانون العمل السوري رقم 17 لعام 2010

- **Telework Between Practical Reality and the Legislative Gap in the Syrian Labour Law No. 17 of 2010**

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