Monthly Compliance Briefing for HR Directors of Québec Companies



Québec employers are heading into 2026 amid an unusually dense thicket of legislative, regulatory, and case-law developments—many of which directly affect HR and payroll. Here's a quick briefing of the important regulatory developments from November that HR directors in Québec need to be aware of.

Compensation & Benefits

Recent amendments under Bill 4 fine-tune the *Québec Pension Plan Act*, clarifying that the presumption of work performed in Québec applies only when the work occurs in Canada. The bill also updates the QPP benefits calculation by excluding months in which an individual receives reduced income-replacement indemnities from CNESST—changes that will require payroll teams to refresh QPP contribution assumptions and benefits modelling.

Pay equity remains a top-tier compliance issue as well. Québec companies facing the Dec. 31 deadline for initial pay equity exercises must now complete their evaluations and prepare for the mandatory 5-year maintenance cycle that follows. Combined with emerging transparency norms, compensation governance is becoming a more structured, audit-ready discipline for Québec employers.

Labour Relations

Union governance is also shifting. Newly tabled Bill 3 introduces stricter rules around construction union dues, voting procedures, and the use of optional dues. HR leaders in unionized construction or mixed-workforce environments should anticipate bargaining table impacts, especially where dues structures or approval processes change.

Immigration

Immigration policy has tightened dramatically. Québec's 2026–2029 Immigration Plan reduces annual permanent-resident admissions and caps the number of Temporary Foreign Worker Program and International Student Program permits. In rapid succession, the province also abolished the Québec Experience Program, extended suspensions of both refugee sponsorship applications and LMIA applications for Montréal and Laval, and introduced a French-language proficiency requirement for temporary foreign

workers renewing after 3 years. These moves collectively signal a more restrictive and Québec-values-driven immigration model—one that HR leaders must incorporate into workforce planning, talent acquisition, and retention strategies.

Free Trade & Labour Mobility

All 14 of Canada's governments, including Québec, signed a new Canadian Mutual Recognition Agreement (CMRA) that comes into force in December, harmonizing compliance requirements for thousands of goods across the country—excluding food—and reducing barriers to interprovincial business.

Like most provinces, Québec is enacting new free trade legislation, Bill 112, allowing for the free movement of intra-provincial goods and services and recognition of out-of-province professional certifications and accreditations of workers from jurisdictions with reciprocal legislation, making it easier for them to ply their trade in Alberta.

New Sexual Violence Regulations

CNESST published new draft OHS regulations requiring employers to take measures to protect workers against risk of workplace sexual violence and psychological harassment (SCV), including providing workers written notice of SCV risks specific to the workplace, delivering training every 3 years, implementing formal reporting and investigation procedures, and taking corrective action. The new requirements are set to take effect Oct. 29, 2026.

Important Employment Court Cases

Among the notable employment cases reported in November was a major time-theft decision upholding the termination of a Hydro-Québec employee who improperly accessed paid COVID-19 leave.

Another case addressed what has become one of the hottest issues in HR litigation right now—employee telecommuting rights. Unlike the typical pattern in which employees sue their company for **not** letting them work remotely, the employees in this case grieved about being forced to work away from the office during renovations. The arbitrator ruled that mandatory telecommuting was, in fact, a violation of the employees' rights to a suitable workplace under the collective agreement and to privacy under privacy laws.

Meanwhile, an arbitrator upheld a residential care facility for mentally ill disabled persons right to ban patient care attendants from possessing their personal cellphones during work hours, citing the vulnerability of the residents and evidence suggesting that staff wasn't complying with the previous ban on cellphone **use** making it necessary to extend it to cellphone **possession**.

Action Points for Québec HR Directors

- Ensure your organization is fully compliant with Québec's Dec. 31 pay equity deadline and prepared for the five-year maintenance cycle.
- Review payroll processes to integrate the new Bill 4 QPP contribution and benefits-calculation rules.
- Update recruitment and workforce-planning models to reflect Québec's reduced immigration levels, permit caps, program suspensions, and new French-language renewal requirements for foreign workers.
- Ensure HR teams understand the remaining immigration pathways (notably the

PSTQ).

- Review collective agreements and union-management processes in light of Bill 3's new construction-union governance rules.
- Review your workplace violence prevention program and ensure it accounts for risks of sexual violence and psychological harassment in the workplace.
- Take steps to prevent your employees from committing time theft.
- Implement a legally sound telecommuting policy at your workplace to ensure control over remote work arrangements.
- Implement an effective Cellphone/Mobile Device Workplace Use Policy.