



Industrial Relations and Social Dialogue in the Age of Collaborative Economy (IRSDACE)

Comparative Report

December 2018

**Mehtap Akgüç, Miroslav Beblavý, Elina Cirule,
Zachary Kilhoffer
Jobs & Skills Unit - CEPS**

Acknowledgements: The authors would like to thank all research partners of IRSDACE for providing useful inputs for this comparative report. The individual national case studies of IRSDACE project can be accessed from the websites of the respective partner organisations. The authors would also like to thank all European social partner representatives who accepted to be interviewed for their input from different angles and sectors of activity in the platform economy work across Europe.

*With financial support
from the European Union*



Industrial Relations and Social Dialogue in the Age of Collaborative Economy (IRSDACE)

The IRSDACE project - Industrial Relations and Social Dialogue in the Age of Collaborative Economy -, funded by DG EMPL of the European Commission, aims to identify how traditional players in the labour market, e.g. trade unions, employers' associations, member states and the EU, experience and respond to the collaborative economy.

IRSDACE had five main tasks: i) conceptualisation of platform work, its place in the labour market, employment policy and industrial relations; ii) analysis of discourse on platform economy among established industrial relations actors; iii) assessment of the implications of workers' experience with the platform economy for industrial relations and social dialogue; iv) comparative analysis of national experiences; and v) analysis of how EU-level employment policy and the industrial relations agenda should respond to the emergence of work in the platforms economy.

One of the project's initial difficulties and findings relates directly to the name collaborative. It has become clear to the research partners that this new reality encompasses many situations where no collaboration (nor sharing) takes place. Hence, the partners have opted for the use of the neutral term platform economy. Nevertheless, when contacting platform workers or national stakeholders, the researchers were faced with the need to use the corresponding local language terms of collaborative or sharing economy as these are the names known to the general public. We therefore recommend that these terms are treated as synonyms in the context of the IRSDACE results.

Seven country case studies have been produced in this project covering Belgium, France, Germany, Slovakia, Hungary, Spain and Denmark. The country case studies were prepared based on literature reviews, interviews and country focus groups. The methods used as well as the results for each country are described in each individual report. The reports show both the perspectives of industrial relations actors at the national level and the experiences of platform workers. A final project output brings the national case study results together in a comparative study.

The project started in January 2017, finishing in December 2018. CEPS is the project coordinator in a partnership with IZA (DE), FAOS at the University of Copenhagen (DK), Fundación Alternativas (ES) and CELSI (SK).

*With financial support
from the European Union*



Table of Contents

Executive Summary	1
1. Introduction.....	3
2. Comparative analysis from the national case studies of IRSDACE	4
3. Results from IRSDACE online survey	9
3.1 Sociodemographic profile of respondents in platform work	9
3.2 Platform work and experience of workers.....	9
3.3 Interactions and representation of platform workers	12
4. Industrial relations, social dialogue and platform economy: a European perspective.....	12
4.1 Digitalisation and underlying developments in the European labour markets	13
4.2 Challenges of organising platform workers in a changing world of work	14
4.3 European social partners' perspectives on platform economy work and interest representation.....	15
4.3.1. General perceptions about the platform economy among social partners.....	16
4.3.2. The role of EU in stimulating/hindering the integration	17
4.3.3. Social dialogue	17
4.3.4. Perspectives about the representation of platforms and their workers	18
4.3.5. New types of organisations/associations for platform workers?	19
4.3.6. A common European approach or accounting for diverse national contexts?.....	19
5. Global comparison of platform economy and social dialogue: experiences from other countries 21	
5.1 United States	22
5.2 China.....	23
5.3 India	24
5.4 Developing countries.....	25
5.5 What lessons for the EU?	25
6. Conclusions and policy recommendations.....	26
References.....	29

List of Figures and Tables

Figure 1. Motivations for doing platform work.....	10
Figure 2. Sector of activity in platform work.....	11
Figure 3. Monthly earnings from platform work.....	12
Figure 4. Transaction, innovation, integrated and investment platforms by region	21
Figure 5. Protection and consultation in crowd work (% of responses)	22
Table 1. Unionisation rate and collective bargaining coverage	6
Table 2. List of European social partners interviewed	16

Executive Summary

This report constitutes the final research outcome of the IRSDACE project. It provides a comparative analysis of the IRSDACE project national case studies and presents the findings of a recently launched online survey as well as giving further and comparative insights on the approaches to social dialogue and the platform economy in Europe and around the globe.

The main findings of the seven national case studies from Europe suggest that these countries have different approaches in the platform economy context – even the terminology used (e.g. collaborative economy, sharing economy, crowdwork, etc.) shows variation. First, most of these countries see the platform economy as part of a wider phenomenon of digitalisation of and in the labour markets. Some countries (e.g. Belgium, Denmark, France and Germany) consider it quite important despite the overall negligible – yet growing – extent of platform work compared to standard employment practices across all countries, while other countries follow the platform economy as an innovative and technological development only (e.g. Hungary and Slovakia) and some observe the developments and try to adapt existing frameworks to platform work (e.g. Spain). Second, the underlying economic circumstances and existing industrial relations practices also differ and imply different approaches to the platform economy. For example, platforms entered Spain in the aftermath of a severe economic crisis and during an important labour market reform granting significant flexibility to firms in hiring and firing decisions. Third, the sectors of focus in the project (i.e. personal transport, micro-task, care and freelance, and accommodation) show variations across countries, with some major platforms not even present in some countries. Fourth, policy priorities and focus also vary between the countries studied. For example, some countries focus on the taxation aspect of the platform economy (e.g. Belgium and Denmark), while others focus on benefits and representation aspects. For instance, there appears to be considerable debate on issues of social security coverage and pension schemes in Germany, while in France the debate among major actors revolves around social protection, unemployment insurance, representation issues of platform workers and professional training. Last but not least, the overall findings point to the fact that despite varying degrees of interest and policy focus, similar issues appear to arise in almost all countries.

In terms of social dialogue, there is a variety of experiences, whereby some countries are clearly frontrunners in platform economy in Europe. For example, France has experienced one of the first instances of social dialogue involving price negotiation between a platform and a workers' union for drivers, which formed in 2016. The negotiation was mediated by an external party appointed by the government. Moreover, Denmark saw the first collective agreement between a social partner and a platform in 2018. In Germany, some existing unions have opened up to include platform workers as their members. In Belgium, social partners have been very engaged in the debate and are trying to reach out to platforms, even though the experience is not always successful. In Hungary, if social dialogue is already weak in traditional sectors, it is weaker in the platform economy. In Slovakia, there appears to be no social dialogue in the platform economy; if anything, there is greater interest in representation on the side of the platforms than on that of the workers.

The results from the online survey suggest that most of platform workers responding to the survey are young men with a relatively high level of education and working for at least 1-2 platforms over the last few years. Most respondents undertake platform work as a supplement to their main income and generally on a part-time basis. The large majority of respondents are not members of trade unions representing platform workers, but more than half of them believe that the unions are necessary to

support the workers. Half of the individuals are aware of social media and other digital media tools through which platform workers organise themselves.

The approach to the platform or collaborative economy at the European level has been simultaneously shaped along with the discussions of digitalisation in the labour markets. The European Commission has been increasingly active in the debate in recent years, as can be seen from various communications, the European agenda on the collaborative economy, research reports and policy documentations on the collaborative economy, non-standard forms of employment and social dialogue. The European social partners welcome a European approach to the platform economy as well as support for an inclusive social dialogue and coordination of some of the platform economy issues at the European level. European social partners also highlight the diversity of impacts of the platform economy across sectors and on existing jobs and how Europe should monitor and address the challenges arising as a consequence.

A quick overview of what has been happening beyond European borders suggests that there are some similarities in industrial relations and social dialogue between Europe and other countries. At the same time, there are many more platforms in the US and China compared to Europe. There generally seems to be a lack of formal worker organisation among platform workers everywhere in the world and the few workers that do organise mainly work for transport platform sector as in Europe. However, awareness of working conditions and concerns is raised by a variety of means (e.g. street strikes, social media awareness campaigns, etc.) in both Europe and elsewhere. Overall, platform work seems to offer both challenges and opportunities wherever it takes place.

In terms of the policy implications of this research, one way ahead would be to find ways on how to link interest representation to social protection and/or labour law to attract platform workers to engage in social dialogue through trade union membership. Similarly, platforms could be encouraged to join organisations to take part in social dialogue. As digitalisation expands to the world of labour, it also does so into the world of social dialogue. This implies an increase in the use of social media and other digital tools in connecting workers in the virtual space of social dialogue. Moreover, to foster social dialogue, existing social partners as well as new forms of organisations among workers or employers should be encouraged. In this context, especially newly-created organisations face funding issues to survive and could be supported by the EU.

As regards working conditions and concerns raised by platform workers, Europe could lead the way to develop minimum standards for every worker and type of employment. Evidence so far has shown that the impact of social partners is stronger when they unite in joint statements, rather than act in isolation. Finally, measures as recommended by social partners and experts on the platform economy could be taken to organise online platform workers at the EU level.

1. Introduction

This comparative report is part of a European Commission funded project, *Industrial Relations and Social Dialogue in the Age of Collaborative Economy* (IRSDACE), to study the industrial relations and social dialogue in the context of collaborative digital platforms focusing on paid work in three specific sectors: (i) transport, (ii) accommodation and (iii) microwork. The project covers seven European countries (Belgium, Denmark, France, Germany, Hungary, Slovakia and Spain). This paper presents the comparative report of the overall research findings complemented with the results from the online survey and semi-structured interviews with European social partners.

As detailed in Kilhoffer, Lenaerts and Beblavý (2017), the following terminology is used throughout the project as well as in the current report: *industrial relations* means collective relationships between workers, employers and their respective representatives, including the tripartite dimension where public authorities at different levels are involved. *Social dialogue* refers to all communications between social partners and government representatives, from simple information exchanges to negotiations. *Social partners* are employees' organisations (such as trade unions) as well as employers' organisations.

In terms of terminology, throughout the IRSDACE project we have come across various terms (collaborative economy, sharing economy, gig economy, crowdwork etc.). We started with 'collaborative economy', but the evolution of the terminology in academic literature, public debate as well as during our experience in talking to various stakeholders has led us to use the 'platform economy' terminology more often, as it is more neutral and appears to better reflect the type of economic relationship under study – which is not always collaborative.¹ In this case, 'platform economy' refers to the part of the economy composed of digital platforms enabling users to share, lend, rent, or purchase goods and services. Some examples of platforms connecting service providers to customers are Uber, Airbnb, Foodora, Mechanical Turk or TaskRabbit. In this case, 'platform workers' are service providers who connect to customers via digital platforms, but are not usually referred to as employees.

Methodologically, this research report is produced by combining desk research synthesising research findings from IRSDACE national studies and other academic and policy literature with empirical data collection through the online survey and semi-structured interviews with European social partners.

The main findings of the seven national case studies suggest that these countries have different approaches in the platform economy context – even the terminology used (e.g. collaborative economy, sharing economy, crowdwork, etc.) shows variation. First, most of these countries see the platform economy as part of a wider phenomenon of digitalisation of and in the labour markets. Second, the underlying economic circumstances and existing industrial relation practices also differ and imply different approaches to the platform economy. Third, the sectors of focus in the project (i.e. personal transport, micro-task, care and freelance, and accommodation) show variations across countries, with some major platforms not even present in some countries. Fourth, policy priorities and focus also vary between the countries studied. Last but not least, the overall findings point to the fact that despite varying degrees of interest and policy focus, similar issues appear to arise in almost all countries.

¹ We also adapt the terminology in the national case studies, by following the mostly used terms respectively.

The online survey results highlight the predominance of young men with a relatively high level of education in platform economy work. Most respondents work for a platform to supplement their main income. While the majority of respondents are not a member of a trade union of platform workers, more than half of them believe that unions are necessary to support the workers. Half of the individuals are aware of social media and other digital media tools through which platform workers organise themselves.

The overview of the European approach to platform economy suggests the importance of the involvement of the European Commission in the debate in recent years through various communications, the publication of the European agenda on the collaborative economy, research reports and policy documentation on the collaborative economy, non-standard forms of employment and social dialogue. While the European social partners welcome a European approach to the platform economy as well as support for an inclusive social dialogue, they also wish for more control and guidance from Europe to monitor and address the emerging challenges of online platform economy work.

From the perspective of a more global comparison, a brief overview of other countries and regions of the world suggests that there are similarities with the European experience in industrial relations and social dialogue. At the same time, there are many more platforms in the US and China compared to Europe. There generally seems to be a lack of formal worker organisation among platform workers everywhere in the world and the few workers that do organise mainly work for the transport platform sector as in Europe. Overall, platform work seems to offer both challenges and opportunities wherever it takes place.

The remainder of the report is structured as follows: Section 2 summarises and provides a comparative perspective using the main findings from the seven national case studies as part of the IRSDACE project; Section 3 presents the empirical results from the online survey conducted in the countries covered by the project (as well as a few other European countries) and provides findings with respect to the platform worker profiles as well as their experience and aspirations for doing platform work; Section 4 brings in the European perspective as per official communications and publications by the European Commission; Section 5 provides the perspectives of the major European social partners in the context of industrial relations and the platform economy based on semi-structured interviews; Section 6 moves beyond European borders to give a brief global overview of industrial relations developments and experience in social dialogue in the platform economy context; finally Section 7 provides concluding remarks and discusses some policy implications.

2. Comparative analysis from the national case studies of IRSDACE

In this section, we briefly summarise, synthesise and compare the seven national reports that the IRSDACE project has produced over the course of the project. More details on industrial relations structures and the platform economy experiences in those countries can be found in the respective national reports.²

First of all, most of these countries see the platform economy as part of a wider phenomenon of digitalisation of and in the labour markets. In some countries such as Belgium, Denmark, France and Germany, the platform economy work is considered quite important despite its overall negligible – yet

² The individual national case studies of IRSDACE project can be accessed from the websites of the respective partners' organisations.

growing – extent compared to standard employment practices. In these countries, there have been lively discussions and policy debates on the issues of platform work among academics, policy makers, social partners, platform workers and (to a lesser extent) platforms. Traditional and social media tools are also widely used to report on the developments of platforms and working conditions of online platform workers. Compared to the first group, the remaining countries covered by IRSDACE appear to follow the platform economy more as an innovative and technological development (e.g. Hungary and Slovakia), while some observe the developments and try to adapt existing frameworks to platform economy work (e.g. Spain). It can be observed that these countries are relatively less active in the policy debates and industrial relation actions compared to the former countries.

The national case studies also show how underlying economic circumstances and existing industrial relation practices differ and hence imply different approaches to the platform economy. For example, platforms entered Spain in the aftermath of a severe economic crisis around 2008 and during an important labour market reform granting significant flexibility to firms in hiring and firing decisions soon after the economic downturn. In particular, the labour reform of 2012 implied that firm-specific agreements have the priority over industry-wide agreements, which used to be the main framework for industrial relations. All in all, these developments and the particularity of the Spanish labour markets (e.g. highly dual or segmented) also fed the development and expansion of online platforms in the country.

As regards the sectors of focus in the IRSDACE project (i.e. personal transport, micro-task, care and freelance, and accommodation), there are clear differences across the countries studied, with some major platforms not even present in some countries. For example, there is no Uber in Germany, Denmark or Slovakia based on recent court decisions. In Spain and Hungary, use of platforms in the accommodation sector is highly developed, but not in Belgium. The personal transport sector is highly developed in Belgium, France, Hungary and Spain, but not in Germany. The delivery sector is also highly developed in Belgium, France, Germany and Spain.

One of the fundamental issues raised across all countries studied concerns the status of workers and the employment relation with the platform. While in most cases platform workers are declared as self-employed, this creates various issues because of the nature of subordination between the worker and the platform. In almost all countries covered in IRSDACE, there are mainly two types of worker status (employee and self-employed), even though platform workers actually fall somewhere in between the two statuses. Despite the lively discussion in most countries on how to approach this, there seems to be no universal platform worker status in Europe. Another major concern for platform workers relates to the working conditions as described in the national case studies. In this area, similar issues are raised across studied countries: stress, payment by the task and not by the hour, lack of control on prices, accident risks, social isolation, etc.

In terms of policy priorities and focus, there are also important variations between the countries studied. For example, some countries focus on the taxation aspect of the platform economy (e.g. Belgium and Denmark), while others focus on benefits and representation aspects. In the case of Belgium, the country passed a specific law establishing a new fiscal regime for income earned through the platform economy. Accordingly, income received through the platform economy is regarded as miscellaneous income as long as a number of conditions are satisfied and the income is lower than an annual threshold value. Taxation issues and proper declaration of platform work are also at the core of the debate in Denmark. On the other hand, in Germany the focus of the platform economy debate is on issues of social security coverage and pension schemes, while in France the debate among major actors revolves around social protection, unemployment insurance, representation issues of platform

workers and professional training. The issue of insurance for freelancers is also an element in the platform economy debate.

In terms of industrial relations, looking at the share of workers that are members of trade unions or those covered by a collective agreement between companies and trade unions is a good start to grasping national differences. Table 1 shows the share of unionised employees and the coverage of collective bargaining in the countries studied in the IRSDACE project. Accordingly, unionisation rate vary across countries (Denmark and Belgium having the highest shares with 67% and 50%, respectively) and remains below 20% for most of these countries. However, collective bargaining coverage is greater for all of them, where Belgium, Denmark, France, Germany and Spain have very high coverages (above 80% for the first three and 70% for Spain) compared to Hungary and Slovakia (33% and 35%, respectively). Reading this table, one could anticipate that these diverse industrial relations settings have direct implications for the representation of platform workers and the platforms in the social dialogue in those countries.

Table 1. Unionisation rate and collective bargaining coverage

	Belgium	Denmark	France	Germany	Hungary	Slovakia	Spain
Employees in unions (%)	50	67	8	18	12	17	19
Collective bargaining coverage (%)	96	80	98	62	33	35	70

Source: ETUI (2016), accessed from <http://www.worker-participation.eu/National-Industrial-Relations/Compare-Countries>.

In terms of interest representation in industrial relation structures, the countries studied during the project indeed show great variation in their experience and the reasons can be related to existing rules or regulations in the countries. In most countries, platform workers are not represented by existing trade unions since they are often not considered as employees, and historically trade unions only represent employees. Similarly, collective bargaining agreements often do not (or cannot) apply to platform workers, for platform workers are often considered as self-employed and it may not be possible (or desirable) to negotiate prices with these self-employed workers due to competition laws and similar regulatory legislation (e.g. Denmark).

On the side of workers, the evidence from the national case studies hints at a general lack of interest among platform workers to join trade unions and there are several reasons for this outcome. First, there is a general declining trend in unionisation rates among all types of workers, not just platform workers and across countries. Second, joining unions and participating in meetings is a commitment and takes time. Platform workers – particularly those from lower socioeconomic background – mention in many interviews in different countries that they cannot afford to attend these meetings and instead prefer completing another task to increase their earnings. Third, given the diversity of sectors of activity of workers, representation of workers becomes even more complex and can be confusing for the worker to choose which union to join, if there is such a possibility. For example, it is not clear whether and how platform workers should be organised (and if yes, at which level: sectoral-level or else), knowing that some of them work for different platforms and even in different sectors simultaneously. Fourth, in some cases of platform work, the workers are isolated or fragmented (or even work illegally) and have no contact with other platform workers to take collective action. This is a particular concern for platform workers in the care and cleaning sectors. Moreover, evidence from talking to platform workers across countries suggests that most of them consider this type of work as a temporary endeavour; therefore, joining a trade union is not attractive if they intend to leave this type of work in the short- to medium-term. Finally, some countries have a tradition of unions or an

established collective action culture; consequently, platform workers might generally be more interested in collective action in those countries where this culture is more embedded in labour relations.

Against these developments, there have been at least two types of approaches by national stakeholders to attract platform workers: expansion of existing unions to include platform workers as new members or creation of new organisations by platform workers. The first option is also interesting for those unions that risk losing members in the future, since by including platform workers they could increase their membership base. In Germany, some existing unions such as *IG Metall* (the union of the metal industry workers and the largest union in the country) and *ver.di* (a service sector trade union and the second largest union in Germany) opened their memberships to include platform workers. In France, the CGT (one of the largest confederations of trade unions) created a branch to include bike couriers and *Force Ouvrière* (the third largest labour confederation in France) has a branch to represent online platform drivers (*FO CAPA*). As regards new unions, the most active country is France: even before the labour law of 2016 giving platform workers the right to constitute a trade union, drivers of a large platform created their own union (SCP VTC) in 2015. Other examples of new organisations are the collective of the delivery workers; for example, *CLAP (Collectif de Livreurs Autonomes de Paris)* rallies independent workers doing delivery tasks in Paris.³ Last but not least, in a number of the countries analysed in the IRSDACE project, interviews with workers suggest that digital tools (e.g. mobile apps) or social media groups are increasingly used to exchange information, organise demonstrations and raise awareness about working conditions and other concerns of platform workers.

On the platforms' side, some of them have joined existing or recently formed employers' associations in some countries such as Denmark, Germany and Slovakia. For example, Uber's software development department is a member of the Confederation of Danish Industry and Danish Chamber of Commerce; *Deutscher Crowdsourcing Verband* in Germany represents the crowdsourcing industry in the country and Uber joined the National Union of Employers in Slovakia. Last but not least, some platforms joined a nascent employers' organisation called *Adigital* in Spain.

Considering the variety of reasons and factors influencing how the main actors (i.e. platform workers and platforms) and their representatives (or the lack of them) are organised (or not) in the existing industrial relations structures results in a heterogeneous landscape of social dialogue experiences across the countries studied. Some countries are clearly frontrunners in the platform economy in this context. For example, France has experienced one of the first instances of what could be called social dialogue in the platform economy. A recently formed union of drivers (SCP VTC) from a large platform (Uber) reached out to the platform via the intervention of the government in order to discuss worker conditions and problems related to price setting in 2016. After a series of demonstrations and strong reactions from the drivers, the union entered into a negotiation with the platform under a mediator appointed by the government. Other new associations or collectives organising delivery workers also tried negotiating with delivery platforms in France; however, there do not appear to be any tangible results from these (intermittent) interactions with platforms. The second concrete example of a social dialogue in platform work comes from Denmark, which saw the first collective agreement signed between a trade union (*3F*) and a platform (*Hilfr*) in cleaning services in April 2018. According to the agreement, effective as of August 2018, the workers will be paid a certain wage per hour with a welfare supplement. Although the collective agreement is relatively short in length compared to traditional

³ There are other regional collectives organizing delivery platform workers as well (e.g. Gironde, Toulouse etc.)

collective bargaining agreements consisting of hundreds of pages, it is the first of its kind in the platform economy context and could be an example for other platforms.

In Belgium, social partners have been very engaged in the debate and often reach out to platforms, but the experience so far has not resulted in a concrete collective agreement. The main development in this regard is the SMart initiative, which originally is a Belgian cooperative of self-employed artists through which the artists have the option to become employees of SMart. SMart has also been active in platform work negotiating employment and working conditions with platforms, particularly with Deliveroo, a delivery platform. During the collaboration between Deliveroo and SMart, platform workers had the option to be an employee of SMart or be self-employed. However, the collaboration between Deliveroo and SMart came to an end in 2017 and Deliveroo changed its remuneration structure from hourly-payment to payment-by-task. In Spain, drivers and delivery workers – particularly the latter – are relatively active and join manifestations, but they have not been able to negotiate directly with platforms nor have their concerns yet led to concrete actions in terms of policymaking. However, it is debated whether to head towards regulating the platform economy by adapting an existing regulation in this context. This existing legislation refers to the TRADE contract (from 2007), which is a contract for economically dependent self-employed workers who earn more than 75% of their income from a single firm. The TRADE contract also offers (limited) pension and health insurance rights, but it does not include specific clauses on worker representation and has yet to be fully implemented with pending legal developments and ongoing court cases.

The social dialogue experience of the Eastern European countries (especially Hungary) already seems weak even in traditional sectors; it is weaker in the platform economy. Yet alternative associations appear to be emerging, particularly in the accommodation sector. The latter sector is also laxly regulated compared to transport sector, for example. Nevertheless, trade unions in Hungary do not have platform workers on a list of their priorities and have limited capacities to organise fragmented platform workers. In Slovakia, the situation is similar to that in Hungary; if anything, there is greater interest in representation on the side of the platforms than on that of the workers, as evidenced by Uber joining the National Union of Employers. Platform workers show no signs of organisation, either to join unions or create one (except for one association in the accommodation sector); there are only some informal discussions on social media, which, overall, goes along with the observation that the platform economy is not seen as a salient issue in Slovakia.

The overall findings point to the fact that despite varying degrees of interest and policy focus, similar issues – particularly as regards employment status and working conditions – seem to emerge in almost all countries studied during the IRSDACE project. However, given the differences in industrial relations structures, the existence and the extent of experiences of social dialogue also varies in the platform economy context. On the one hand, in some member states platform workers are integrated partly in the existing trade unions (e.g. France, Germany), formed new unions (e.g. France) or became part of a collective agreement (e.g. Denmark) between unions representing these workers and the platform. Nevertheless, it is worth mentioning that even in the countries where industrial relations structures encourage the formal or informal organisation of platform workers and there are actual instances of social dialogue, these experiences do not always translate into improved working conditions for platform workers. On the other hand, in some member states the developments in the platform economy are closely (sometimes less so) followed by social partners and government without much action or concrete policy measures (e.g. Hungary, Slovakia, Spain). In others, the focus on policymaking is more on taxation issues of the platform economy rather than in pushing interest representation, but

established industrial relations actors are, nevertheless, looking for ways to increase links with workers and platforms (e.g. Belgium).

Finally, the role of EU is seen positively overall (if not by all), and member states would appreciate guidance from the EU on the framing of the definition and type of platforms to help them adjust their national legislation according to their own context. For example, stakeholders from the different countries analysed refer to the European Court of Justice ruling on Uber as an interesting development in this regard. These stakeholders highlight that the role of EU could be to provide a typology of platforms to allow member states, given their respective national contexts, to make their regulations from there on. However, stakeholders in some countries are more sceptical about the role of EU as they believe that labour laws are part of national competences.

3. Results from IRSDACE online survey

In this section, we describe the findings from the online survey that was conducted as part of the IRSDACE project. The online survey was distributed to individuals who have performed online platform-related paid work in the last six months. In other words, complementing the other research tasks of IRSDACE, the online survey targeted platform workers in Europe to obtain further insights of working conditions and experience in platform work as well as to gain a broader understanding of their knowledge about interest representation and social dialogue in platform economy work. To this aim, all IRSDACE project partners participated in sharing the survey link with their network in their respective countries. The survey link remained active from April 2018 until October 2018. Further advertising was placed on social media to reach out to a larger audience beyond the initial seven countries of IRSDACE.⁴ However, despite the efforts of the researchers and involvement of the social partners, the response rate was lower than expected.⁵ With this caveat in mind, we describe the overall results in the following sub-sections.

3.1 Sociodemographic profile of respondents in platform work

About two thirds of the respondents are composed of young men aged between 18 and 35 years, who are mostly single and with no children. Moreover, about 20% of them are foreign-born, which is about twice the European average of foreign-born populations. The overall distribution of educational attainment is skewed towards the higher end, with nearly two thirds of the sample having tertiary education or above.

3.2 Platform work and experience of workers

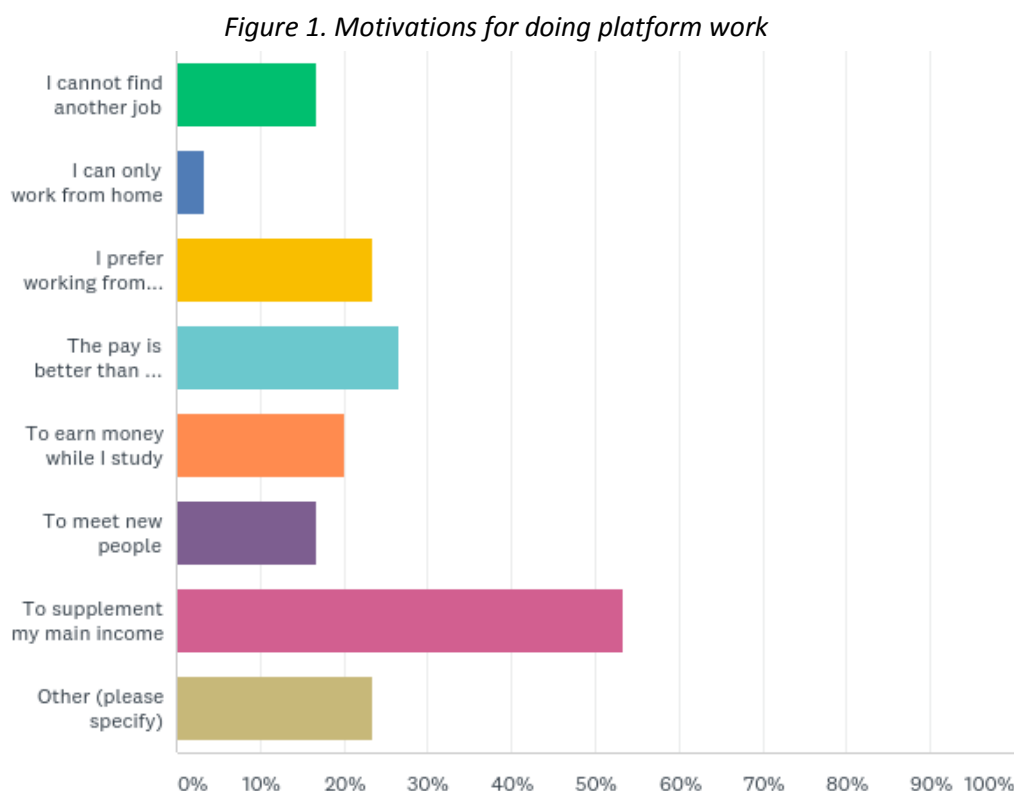
Most of the people work for several platforms (one, two or more) and generally on a part-time basis. Only 23% of individuals reported working full-time in the platform economy. Moreover, more than half of respondents reported being already an employee in another job, while one third declared

⁴ By the time the survey was closed, we had received responses from Portugal, Italy and Poland in addition to the seven countries covered by IRSDACE.

⁵ Overall, the response rate remained less than 100 individuals (precisely 84) in Europe and, therefore, any results presented in the following should be read by keeping this caveat in mind. Initially, we intended to make a separate analysis of the survey results by the countries covered in IRSDACE; however, given the overall low response rate, we decided to aggregate the results at the European level and present them in this comparative report.

themselves as self-employed. 7% of individuals reported being students, and 3% retired. 10% of respondents mentioned that they do the platform work on a voluntary basis and not for money.

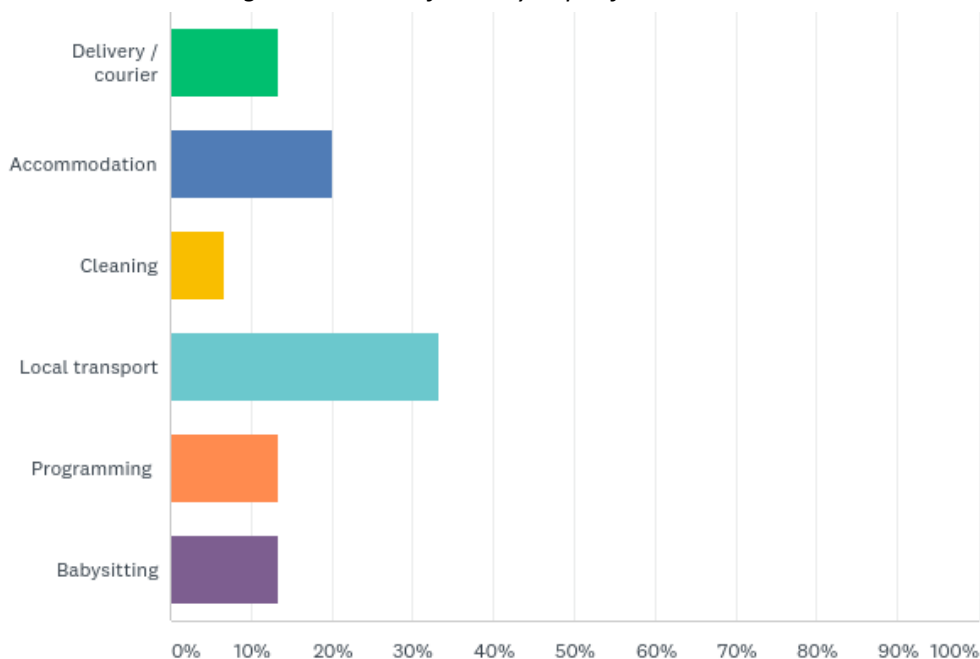
Most of respondents reported having started such platform work only in the last 3-4 years, with more than 40% of the sample having started in 2017 in particular. The following figure displays the major motivations for doing platform work.



Note: This figure shows the responses to the following question in the IRSDACE online survey: “Why do you work on a platform? You can pick more than one reason.”
Source: IRSDACE online survey results (2018).

As seen from the above figure, most of the individuals responding to the survey engaged in platform work to supplement their main income. Among other motivations are that pay is better than in the other jobs that they can get, a preference to work from home, an inability to find another job and the desire to meet new people.

The following figure shows the types of activities in the platform economy for which the respondents work the most hours. It can be seen that local transport, accommodation and delivery/courier are among the most reported types of activities chosen by the respondents. These activities are followed by programming (13%), babysitting (13%) and cleaning (7%). All these sectors of activities closely match those focused on in the IRSDACE project. The survey respondents also report performing platform work mainly around the city (e.g. local transport, delivery work) or at home (e.g. accommodation, freelancing, cleaning, babysitting etc.) in line with the sector of activity.

Figure 2. Sector of activity in platform work

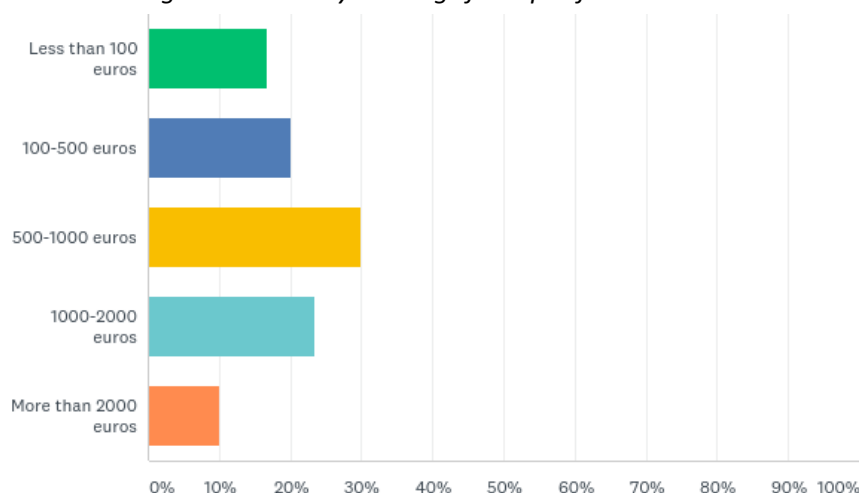
Note: This figure shows the responses to the following question in the IRSDACE online survey: “What is the main activity in the platform for which you work the most hours?”

Source: IRSDACE online survey results (2018).

In terms of the skills needed for doing platform work, the respondents chose communication (43%), driving/riding (37%) and software/programming (13%) among the top three. Interestingly, communication comes out as the most important skill in platform work. Although it is hard to draw generalised results from such a small sample, this finding could be related to the importance of the ratings and reputation of workers in platforms, as the communication skill could be an important determinant of overall satisfaction about the platform work and how it is perceived by the clients.

When asked about a rough estimate of the time spent on platform work over a month, most of the individuals (nearly three quarters) report working a maximum of half their monthly hours on platform(s). This result is in line with the previous result on part-/full-time work in platforms. The next figure displays the distribution of earnings.⁶ Accordingly, about two thirds of the sample earn up to 1,000 euros (net) per month from doing platform work. 10% of the respondents earn more than 2,000 euros (net) per month. This suggests that platform work could indeed be an important supplement to the main income of individuals. Meanwhile, nearly two thirds of individuals in the sample reported that the platform work does not give them any access to additional benefits such as health, accident and unemployment insurance nor paid holiday or sick leave.

⁶ We note that this distribution does not take into account the differences in purchasing power across countries; it only reports the absolute (and net) amount as reported by respondents.

Figure 3. Monthly earnings from platform work

Note: This figure shows the responses to the following question in the IRSDACE online survey: “How much do you earn on average (net) per month through platform work?”

Source: IRSDACE online survey results (2018).

As regards platform work satisfaction, the large majority of respondents report being satisfied with platform work (more than 75%). Most of them appreciate the flexibility, working hours and place of work.

3.3 Interactions and representation of platform workers

The final set of questions in the online survey relates to the interaction of respondents with other platform workers, relations with platforms, clients and other forms of organisation of workers. According to the results, more than two thirds of respondents have interactions with platforms or with other platform workers. However, despite the relatively high level of interaction in this context, 90% of respondents are not formally a member of an organisation, association or trade union bringing together workers working in the same sector or platform(s). Nevertheless, more than half of individuals in the sample agree that trade unions are necessary to support and represent platform workers. Moreover, while not formally a member of unions or organisations, half of them are aware of various social media tools (e.g. Facebook groups, WhatsApp groups etc.) in which platform workers exchange information or are organising themselves to discuss common problems. These findings are closely in line with what is found in most of the national case studies that IRSDACE has researched in Europe.

4. Industrial relations, social dialogue and platform economy: a European perspective

In this section looking at the European approach to social dialogue in the platform economy context, we first briefly summarise the broader perspective of the European Commission based on the available policy documentation. While we consulted a number of publications by European institutions, the recently published *Employment and Social Development in Europe (ESDE)* (June 2018), an annual overview of economic and social developments in the European labour markets published by the

European Commission, provides the most recent approaches to and developments in social dialogue and the platform economy at the European level.⁷ We complement this section with the perspectives of European social partners that were interviewed during the project.

4.1 Digitalisation and underlying developments in the European labour markets

Online platforms and the collaborative economy have seen their popularity increase in the last few years, which has led to their recognition by institutions at the European level. In May 2016, the European Commission released a communication regarding the innovation opportunities and regulatory challenges associated with online platforms (European Commission, 2016b). The communication acknowledged the revolutionary impact of online platforms on information access, offering better connections between buyers and sellers of goods and services. Then in June 2016, the European Agenda for the Collaborative Economy clarified the concept of employment status that the term ‘platform worker’ signifies and elaborated on the overall EU definition of a worker (European Commission, 2016a). The June 2016 communication also points to the economic benefits of such (new) business models and how the collaborative economy creates opportunities. Furthermore, the European Commission 2016 Annual Growth Survey⁸ suggested that regulation towards flexibility would encourage the entry of new players in the market, lowering the cost of services and expanding the offer for consumers. The annual survey also suggests that attention should be paid to the responsibility of member states and the EU for ensuring good working conditions as well as fair and sustainable competition (European Commission, 2016a).

Recognising the changes in the labour markets, ESDE (2018) points out digitalisation and organisational transformations as among the main key drivers; however, this process is also accompanied by globalisation, demographic shifts as well as other developments in labour markets such as the increasing participation of women in the labour market. Emphasised by the European Pillar of Social Rights, and also highlighted in ESDE (2018), there are three main areas of challenges to take into account when looking at further developments in social dialogue. First, skills need to be adapted to the digitalisation in the labour market – increase in ICT, communication and social skills – emphasising the importance and need of higher education. For example, the European Commission argues that with the increasing impact of digitalisation on labour markets, there is a larger demand for new skills from employers and employees. Therefore, educational investment plays a crucial role in creating skills and educating employees to be able to adapt their already existing skills. To this aim, the agenda proposed by the European Commission (2016a) encourages the development of national digital skills strategies. Second, the flexibility of working time and place, which the new forms of work have developed, has a direct impact on working conditions. It creates flexible working hours adapted to the

⁷ We note that the terminology used in most of these publications is ‘collaborative economy’, which was also the initial terminology of the IRSDACE project. While we have a preference for using ‘platform economy’ after having conducted further research during IRSDACE and other similar work, for the purposes of this report these terms are used interchangeably.

⁸ The Annual Growth Survey is the European Commissions’ main tool for setting out the general economic and social priorities for the EU for the following year. The Annual Growth Survey marks the start of the European Semester, which is the annual cycle of economic policy coordination, where national policies are reviewed collectively at the EU level. For more information, see: https://ec.europa.eu/info/sites/info/files/the-autumn-package-explained_en.pdf

needs of workers as well as locating the place of work outside the employer's premises. Last but not least, flexible employment provides autonomy to the employee within their work: the employer is losing immediate control over employees' work and the employment relationship becomes focused on the results or tasks and *not* on hours worked. Moreover, the diversity of the employment and contract types generates differences in the opinions and the common interest of employees as a whole, which, in turn, complicates the job of the trade unions.

The diversity in contract types (e.g. fixed-term contract, self-employed or part-time contract) has been common in labour market for decades, but now their relevance has increased with the development of new forms of work (voucher-based work, zero-hour contracts, employee sharing and platform work). Such developments have been initiated by the need of companies for occasional staff at times of unexpected activity, or are used as a short-term probation for future permanent employees. However, these forms of work have nowadays become associated with low job security, weaker career progression, lower income, limited access to on-the-job training, limited access to social protection, including unemployment benefits, and poor access to mortgage and credit. The European Commission argues that labour law should be modernised in terms suitable to the needs of these new forms of work (ESDE, 2018).

4.2 Challenges of organising platform workers in a changing world of work

The traditional role of social partners and social dialogue is not easily applicable given the shift in the employment structure in the platform economy. The challenge for trade unions in being able to represent platform workers could stem from several factors (ESDE, 2018). First, it can be a matter of the non-standard employment, which is less attached to a workplace and it might not be clear what the worker-employer dichotomy is. Second, it is common that the non-standard and fixed-term workers are less likely to be a member of a union than a permanent-contract worker. Third, there also appears to be a lack of information about and experience of the benefits of becoming a union member. Furthermore, workers in these new forms of employment are difficult to organise as sometimes they are very fragmented or isolated. For these reasons, participation in collective action is complicated for workers in non-standard employment (ESDE, 2018).

Nevertheless, trade unions have developed strategies to represent non-standard workers as highlighted by ESDE (2018), among others. The service model, whereby unions offer services tailored to specific needs, but also the lobbying model, where they offer advocacy, lobby decision-makers and stimulate awareness-raising campaigns. For example, the ETUC and the French 'Sharers and Workers' network have recognised the need to organise platform workers at the EU level. Steps have been taken to develop a dialogue about the platform economy, where experts, trade unionists, workers and platform entrepreneurs can join a common discussion.⁹ The goal of this dialogue is not only to possibly improve general working conditions for all workers in the labour market, but also to prevent the

⁹ They jointly organised an international conference bringing together various stakeholders and social partners from member states, European institutions, platform representatives and new forms of organisations of platform workers in order to have a European debate about the platform economy and social dialogue. More details of the event can be found here: <https://www.etui.org/About-Etui/Foresight-unit2/News-and-activities/Conference-Sharers-and-Workers>

lowering of social norms in the work environment. Such a dialogue can also provide an opportunity to exchange good practices across countries. For example, Austria has staged the first works council of online platform workers, which was created from a transport and service trade union called *Vida*. This works council now exists as a representative body calling for better working conditions and employment rights of these platform workers. ESDE (2018) also points to the importance of organising trans-border platform work, considering that in many cases there is no limitation of the physical location where the services are carried out and consequently several national legal systems share responsibility.

However, digitalisation and platforms not only impact workers but also employers. By leading to lower market entry barriers, platforms decrease transaction costs, which then give them cost advantages compared to large-sized companies. The European Commission argues that until now platforms have been considered as competitors in the labour market, yet with the advantage of operating with less regulation (ESDE, 2018). It is suggested that it would be beneficial for employer organisations to enter into discussion with platforms to establish a coordinated level playing field in the labour market.

Finally, the European Commission argues that collective bargaining can offer social partners an opportunity to manage the new structural changes in the world of work (ESDE, 2018). Either collective agreements can cover an employer through self-organised agreements, or through being a member of an employer organisation that is a part of a collective agreement, the employees are automatically part of this collective agreement as they are part of the company. Furthermore, it is important to ensure a fair income distribution, better working conditions and maintain competitiveness in the economy (ESDE, 2018; also highlighted in the European Pillar of Social Rights).

4.3 European social partners' perspectives on platform economy work and interest representation

At the European level, social partners have responded to digitalisation by presenting a joint agreement¹⁰ and stating that employment policy must act as the driver of digital transformation, arguing that different levels of public authorities should create policies to help employees adapt their skills to labour market demands. Accordingly, regulations in the labour market and public institutions should develop alongside developments in digitalisation. Social partners from the joint agreement also argue that discussions about the organisation of work should be carried out in consultation with relevant stakeholders and with participatory procedures. It also appears that social partners have a stronger impact when they unite in joint actions, rather than making isolated statements.

Similar to the aforementioned joint agreement, representatives of temporary work agencies and private employment services have published a white paper on the future of work, identifying new

¹⁰ The joint statement was issued on the occasion of the Tripartite Social Summit in 2016 and was agreed by ETUC (European Trade Union Confederation), Business Europe, CEEP (European Centre of Employers and Enterprises providing Public Services) and UEAPME (*Union Européenne de l'Artisanat et des Petites et Moyennes Entreprises -Association of Crafts and Small and Medium Enterprises*).

forms of work in Europe and targeting the need for changes in employment regulation in 2016.¹¹ Furthermore, the European Trade Union Confederation (ETUC) has adopted a *Resolution on tackling new digital challenges to the world of labour* (particularly, crowdwork). While there are certain challenges – as also seen from national case studies in IRSDACE – for national trade unions in representing platform workers, the ETUC recognises that there are groups organised by platform workers themselves, which are attempting to take legal action to establish their credentials as representatives (ESDE, 2018).

After a broader view of the developments of social partners' approaches to the platform economy and social dialogue, we now present more detailed perspectives of the European social partners interviewed during the IRSDACE project. The social partners interviewed include both sectorial and cross-industry trade unions and confederations as well as the employers' organisation. The semi-structured interviews were conducted mainly over the summer and early fall of 2018. The list of interviewed organisations is given in Table 2 below.

Table 2. List of European social partners interviewed

Acronym	Social partner	Sector of activity in the platform
BusinessEurope	Confederation of European Business	Employers' organisation (horizontal)
CEC European Managers	Confédération Européenne des Cadres	Cross industry
CESI	European Confederation of Independent Trade Unions	Public/private sector
EFFAT	European Federation of Food, Agriculture and Tourism Trade Unions	Food, agriculture, tourism
ETF	European Transport Workers' Federation	Transport

4.3.1. General perceptions about the platform economy among social partners

The first part of the interview is about the general perceptions about the platform economy and how the social partners see the situation evolving at the European level. The representative of CEC European Managers suggests that the scope of the platform economy within the whole economy remains limited. However, some sectors like tourism, transport and logistics face profound transformations, which challenge actors in the market and the traditional forms of employment, placing them in a legal grey zone, particularly as regards employment relations and taxes. Involuntary self-employment and precarious employment have also grown in recent years; however, little data is available to assess the impact of the platform economy in economic, social and environmental terms.

EFFAT is most concerned with the employment aspect of this change. Considering the agenda for the collaborative economy by the European Commission (2016a), EFFAT argues that the communication was too positive when talking about new possibilities for the consumers and the possibility of creating new jobs. However, they disagree with the European Commission's suggestion that member states should adapt their rules to the new business models. EFFAT believes that it is the new business models that should play along with the pre-existing rules. Furthermore, they also argue that there was no

¹¹ For more details, see the white paper published by World Employment Confederation – Europe (WEC - Europe) here: https://www.weceurope.org/uploads/media/WEC-Europe_The_Future_of_Work_-_What_role_for_the_employment_industry.pdf

impact assessment of what such platforms mean for existing jobs in this sector, particularly in the traditional hotel industry. For example, the representative of EFFAT stated that when looking at the case of Airbnb, there are not many job positions on the platform itself, but the platform has a broader impact on already existing jobs. EFFAT assumes that there is a considerable impact on existing workers, putting pressure on their conditions: most of the workers become self-employed, with flexible yet precarious conditions, and they are often undeclared. In their opinion, every worker in the new business model should have the same protection and rights as any other employee.

4.3.2. The role of EU in stimulating/hindering the integration

CEC European Managers argues that besides supporting research and some social dialogue initiatives, there has been little action by the EU institutions towards integrating platforms. In other words, they realise that little legislative or market supervision action has been taken at the EU level. Yet with the participation of social partners, some initiatives are being taken by think tanks or research institutions to nourish the debate. For example, the Sharers & Workers network, an initiative co-organised by ASTREES (*Association travail emploi Europe société*), is a forum for discussion on the specific question of working conditions of platform workers and demonstrates the interest of social partners. Overall, the EU stakeholders support four domains for action that have been discussed within the Digital Single Market and the European Pillar of Social Rights: (i) the development of the digital economy, (ii) lifelong learning and digital skills, (iii) evolution of social protection systems/better working conditions and (iv) consequences of Artificial Intelligence (AI) for accountability, quality and quantity of jobs and social inequalities. Nevertheless, CEC European Managers argues that it is necessary for the EU to reflect – together with social partners and other stakeholders – on ways to regulate this phenomenon.

Business Europe has had discussions with the European Commission on issues related to the platform economy. In particular, they have been involved in an initiative to discuss the issues of digitalisation, the world of work and platform work among European social partners, members of federations and sectoral partners; however, platform workers were not involved in these discussions. Moreover, Business Europe has been engaging in a debate with the European Commission on the platform economy with regard to the internal market, focusing on employment aspects. In general, the European Commission proposals are related to platforms, digital economy and data protection, but do not always directly involve issues dealt with by Business Europe as a social partner. Additionally, the European Commission has set up a High-Level Expert Group to investigate the impacts of the digital transformation on the labour market. This group of individual experts does not include Business Europe, trade unions and employers, but they believe that it is important for them to be able to express their opinion as social partners.

4.3.3. Social dialogue

In terms of social dialogue among social partners, there is a certain prerogative at the EU level to discuss certain issues in a “closed shop”. CESI argues that the social dialogue is outdated and suggests that it is difficult to consider the platform economy within industrial relations, because the platform owners do not consider themselves as employers, but as an IT service that is bringing two parties together. Since there are no clear representatives for the platform workers or the employers, social dialogue cannot be created in the traditional form. The position of ETF echoes that of CESI, advocating that employer companies like Uber should become involved in social dialogue as a transport service

provider, rather than as an IT service. Furthermore, CESI argues that the access to rights and social protection is very difficult for individuals in atypical work, as there is no formal contract or lobby for their representation. A way to adapt to the situation would be to reach out to platform workers and possibly offer them tailored social insurance like pension schemes, health and accident insurances.

Moreover, social dialogue may have become a way of maintaining closed-shop policies, which the reality of the development of the platform economy has sidestepped. It has become difficult to identify employers to talk to or workers to represent. There are sectors of the labour market, where the tool of social dialogue still fits in the structure, but CESI together with the European Federation of Agency Workers agree that the solution lies in finding a different means of representation for platform workers.

4.3.4. Perspectives about the representation of platforms and their workers

Business Europe sees a majority of the people working for platforms as clients of the platform and not as employees of it; therefore, they agree that since these workers are classified as self-employed, trade unions and collective agreements do not represent or cover them. Business Europe has not been in contact with platform workers, as platform work does not correspond to the structure of the organisation, which only includes national member federations. However, there is an advisory support group that includes some platform companies (e.g. Uber), though this only means that these individual companies are in contact with the advisory support group but are not represented in negotiations by Business Europe.

Similar to other trade unions and employer organisations, few professionals, managers and executives from the platform economy have joined member organisations of CEC European Managers. However, it advocates for a more inclusive and diverse European social dialogue, in which platform workers and various other forms of work are equally represented. CEC European Managers believes that the old and confrontational industrial-age social dialogue opposing capital and labour is outdated, has reached its limits and fails to formulate solutions for those who are most affected by the digital transformation. Instead, digital tools could be used to attract these new actors and account for professional mobility and transnational company structures. Therefore, CEC European Managers argues that social dialogue should reflect the diversity of the world of work instead of remaining stuck in old division lines on both sides of the spectrum.

While there are initiatives to organise platform workers, there seems to be less interest in organising among the platforms at the European level, similar to what was observed at the national level. Initiatives and campaigning show that unions can be progressive, tackling new forms of employment, but in terms of social dialogue, both sides (workers and employers) are expected to respect the frame. ETF argues that some platforms are looking to find this parallel status and there is no incentive for them to enter the social dialogue. As they consider themselves an IT service, they can only engage in social dialogue with the IT sector regarding their office employees, not the service sector. ETF is interested in the organisation of workers; however, they recognise that it has been difficult to bring these workers together until now. Nevertheless, there are examples in the US where platform workers find a way to unite and put forward collective demands from and via unions.¹² ETF representatives

¹² For more details on global comparison, see section 5.

argue that it matters if a trade union in a country is also able to represent the self-employed. They also note the alternative approaches: using the means of social media to get in touch with platform workers.

EFFAT, on the other hand, suggests that providers of the new form of accommodation should follow the same rules as the traditional industry, which means that they should pay taxes, provide health and safety insurances, consumer protection and follow employment rules. They believe that the increasing number of providers that are using platform without common rules creates unfair competition. In a joint statement, EFFAT, together with employers, have asked the EU to level the playing field and to ensure fair competition in the accommodation sector. The providers of the platforms, on the other side, have created their own European platform together with the European Hospitality Home Association to fight against limitations, such as the maximum (annual) number of days of stay.

4.3.5. New types of organisations/associations for platform workers?

Business Europe sees the possibility that platform workers may organise themselves and approach the unions on their own. If they manage to organise themselves in any way, whether it is at the sectoral, national or the EU level, the EU would not be against a new organisation appearing. The problem would appear later on if those organisations seek to become social partners and ask to be classed as employees by Business Europe. They argue it is unclear how representative these platform worker organisations are.

An example given by CESI about a strike organised on social media by bikers indicates that these platform workers need a sense of unity and belonging to be able express their views and needs. CESI believes that people from inside this community are best placed to represent their interests, for the insiders would understand the best way to access the workers.

CEC European Manager's member organisations are experimenting with new services and models of representation. For example, some members have created specific structures to allow representation for self-employed workers and offer corresponding services to them.

4.3.6. A common European approach or accounting for diverse national contexts?

In the last part of the interviews, the social partners were asked to give their opinion on whether a common approach at European level is appropriate when it comes to social dialogue in the platform economy context or whether the diversity of national contexts needs to be accounted for.

CESI agrees that the EU should develop a solution for platform workers. There is a lot of imagination, different studies and initiative reports that suggest ideas for allowing platform workers to create interest representation. Until now, interest representation itself has only been an intuitive solution for platform workers and it has not been backed up by any solid research. They refer to the International Labour Organisation (ILO) and how, in current industrial relations structures, taxation, social protection and labour/civil law always have been linked to the work contract. However, CESI suggests that social protection should be linked to the residency of an individual. Ideally, they argue that there should be a global taxation system across all countries.

EFFAT indicates that in the platform economy there is no real social dialogue at the company nor the national level; therefore, without this basis there cannot be a dialogue at the EU level. They suggest that starting negotiations with companies is the first step, after which actions can be carried out at national level, and finally it can be discussed at the European level. As the platforms operate beyond national borders, EFFAT agrees with CEC European Managers that a common European approach is a good solution. Some elements of this approach should include common rules of registering hosts/costumers, tax payment, safety insurance and security rules (also including job security from the employment point of view), making sure that all workers are covered in new business models in the future.

Business Europe acknowledges that there is an increasing number of people working in platforms as self-employed and a need for increased attention to the sustainability of social protection systems/contributions. They do not see the solution at the European level, because social protection systems are national competences. The EU has the competence to coordinate these developments; however, it does not have the right to regulate them. National-level decisions can possibly adjust the tariffs for private market-based insurance, health, safety or accident insurance, or even pensions for platform workers. This is already being done for people who are self-employed. Some countries, for example Denmark, have been experimenting with different rulings, and platform workers have been classified as employees in some sectors. They have tested whether workers in certain platforms should be covered by collective agreements. Finally, Business Europe argues that it is important to remember that although there is so much discussion around platform work and new forms of work, it still remains a small percentage of total employment. The majority of workers have traditional contracts or forms of employment across countries. They believe that the emphasis should be on finding a way to accompany these employment transitions. However, Business Europe argues that if one moves to a model where platform workers are classified as employees, this might undermine the flexibility of these business models.

Workers with traditional work contracts or persons who identify as self-employed are covered by social protection; however, this does not necessarily apply to the workers in the grey zone, for there is no clear definition of who is the employer. Therefore, CEC European Managers argue that it is crucial to develop minimum standards for every worker and all types of employment. Considering the transnational operations of the platform companies, a European approach is desirable to accompany its developments in terms of market competition, economic development and social rights. An overall strategy aiming at increasing socio-economic convergence could then be adapted further at member state level.

According to ETF, the EU has a responsibility to ensure that there is no abuse in the labour market, where the platform workers should enjoy the standard labour rights of normal employees and that there is legislation on platforms at the European level. In this context, ETF considers the taxi business as a public service, for which there is a European legislation on passenger/public transport services. However, they feel that there is a tendency among the European institutions to impose lesser restrictions on member states (e.g. taxi sector) and to promote liberalisation to facilitate the establishment of new service providers. ETF disagrees with such an approach and argues that unless there is a guarantee of rights for passengers, rights for workers and free access to the market, there

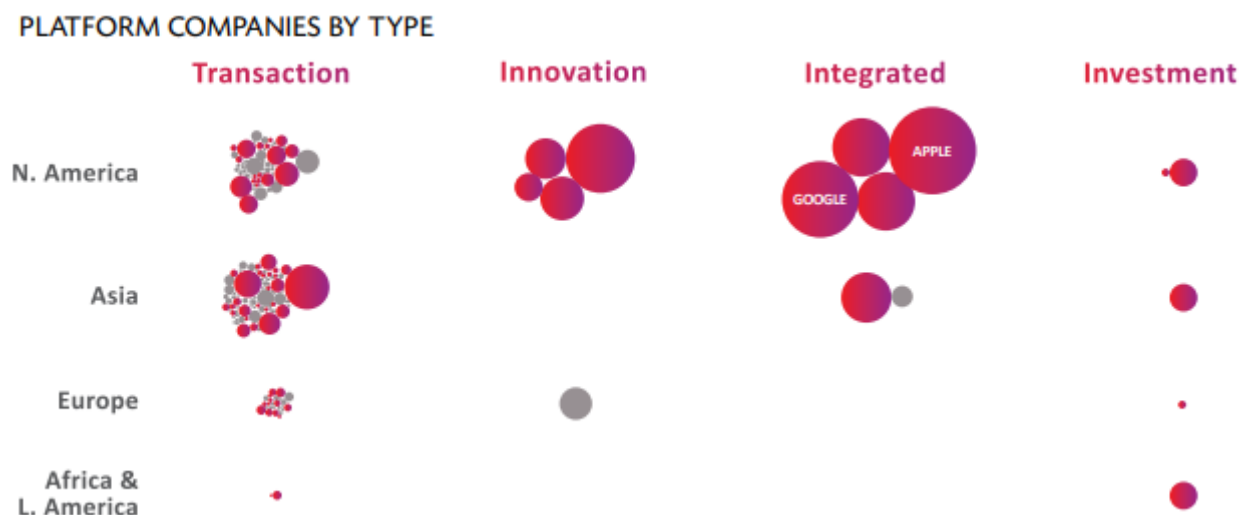
should not be facilitation or liberalisation. Although ETF is not against new technologies promoting innovation, jobs and growth, they believe that some degree of enforcement is important.

5. Global comparison of platform economy and social dialogue: experiences from other countries

Less literature covers the platform economy with respect to social dialogue and industrial relations outside of Europe. Most noteworthy collective bargaining has taken place in the United States, which has a strong and dynamic platform economy, as well as a Western model of industrial relations. However, platform work is present worldwide, and labour dynamics in locations from India to Sub-Saharan Africa are noteworthy in this regard.

Evans and Gawer (2016) identified four types of platforms, and labour platforms fall into their category of “transaction” platforms as shown in Figure 4e 4, Asia has many more platforms in this category than Europe and slightly more than North America. Africa and Latin America have far fewer.

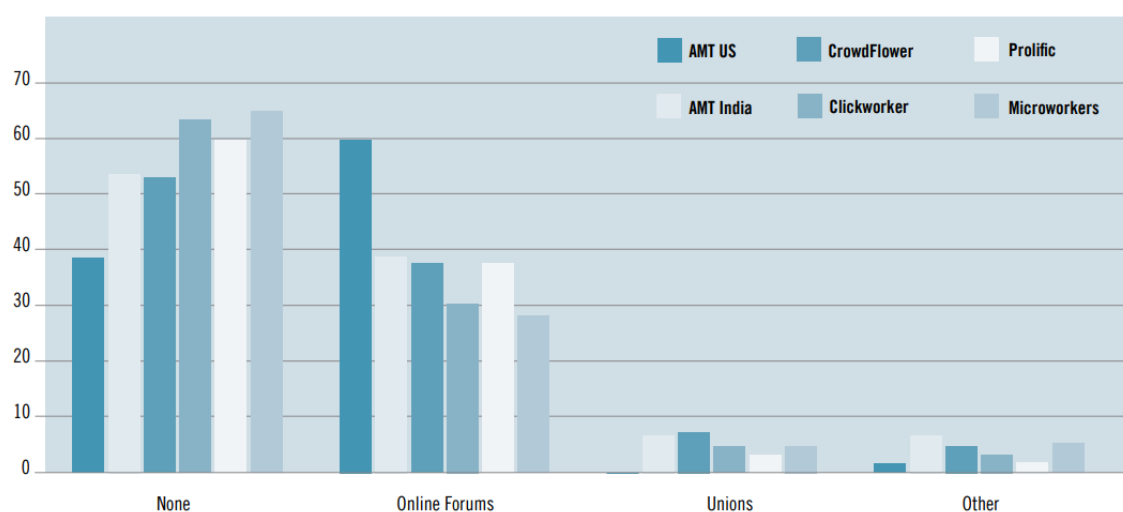
Figure 4. Transaction, innovation, integrated and investment platforms by region



Source: Evans and Gawer (2016, p. 16).

A recent ILO publication built on thousands of surveys of platform workers around the world including numerous European countries, developing countries like Nepal, Nigeria, Venezuela, and large economies including the United States, India and China. One finding is that the majority of platform workers do not rely on unions for information and protection as regards their platform work, as shown in Figure 5. Instead, platform workers often use online forums to solve any issues they might encounter, as they may have no other recourse.

Figure 5. Protection and consultation in crowd work (% of responses)



Note: AMT refers to Amazon Mechanical Turk. All platforms in the Figure primarily intermediate simple tasks performed online with a computer.

Source: ILO (2018, p. 81).

The remainder of this section will summarily discuss social dialogue in the platform economy, both in the sense of more formal industrial actions, as well as less formal online communities, ‘soft union’ initiatives, and new types of intermediaries for crowd workers.¹³ The state of affairs will be discussed primarily for the United States, China, and India, while the situation in developing countries will be briefly touched upon.

5.1 United States

As the birthplace of many of the largest platforms, the United States has a dynamic platform economy. In spite of historically low trade union density (OECD, 2018a), platforms have been very image conscious, which in some cases led to collective bargaining and facilitating workers’ demands. Collective action in the platform economy has mostly occurred in the context of on-demand taxi services. Collective bargaining and strike actions have taken place between drivers of platforms such as Lyft and Uber on the one hand, and the platforms on the other. In many cases, the drivers were assisted by established unions.

For example, the Teamsters¹⁴ actively aided platform drivers in the west coast, particularly in Washington and California. Members of the App-Based Drivers Association, affiliated with the Teamsters, pushed passage of a 2015 law in Seattle that extended collective bargaining rights to platform-based drivers. The New York City Driver’s Guild helped organise New York City Uber drivers. Subsequent negotiations resulted in Uber facilitating some driver demands, such as adding an in-app tipping option and a higher minimum fare rate (Kilhoffer et al., 2017). Furthermore, informal online communities exist for app-based drivers to share information with one another (ibid.).

¹³ For discussion on “soft union” initiatives and new types of intermediaries for platform workers, see Kilhoffer et al. (2017) and Aloisi (2015).

¹⁴ The International Brotherhood of Teamsters, or simply Teamsters, is a prominent union based in the United States and Canada.

Additionally, alternatives to corporate platform structures have emerged. For example, Arcade City is a cooperative personal transportation app that emerged in Austin, Texas after the city prohibited other ride-hailing platforms. Arcade City claims its model is significantly better for drivers in terms of pay and autonomy (Arcade City, 2018), but no available literature seems to have compared it to existing platforms.

Organisation is not limited to drivers, however. Turkopticon represents an interesting platform worker initiative that began in California, but benefits platform workers on Amazon Mechanical Turk (AMT) based around the world. AMT does little to prevent non-payment and other abusive practices of individuals posting tasks, while allowing workers (“Turkers”) to be rated on their work performance. The idea behind Turkopticon is to turn this system around, allowing Turkers to rate the individuals posting and paying for tasks. In doing so, the community of Turkers help themselves avoid exploitative practices (Silberman & Irani, 2016).

5.2 China

The largest platform market in the world is China, which is marked by a number of dynamic and innovative platforms. China has large number of ‘unicorns’, and sharing services are popular as well as e-payment options with cell phones. China has over 700 million smartphone users which helps drives the market (Foreign Affairs, 2017). Moreover, the majority of internet usage is from mobile phones, which facilitates app usage.

Relatively little scholarly literature is available on Chinese industrial relations, in spite of many changes in recent decades (Traub-Merz & Zhang, 2010). In principle, Western-style collective bargaining is allowed under the Labour Contract Law of the PRC, provided that the unions involved are recognised by the All-China Federation of Trade Unions. The All-China Federation of Trade Unions is the CCP’s official trade union federation. While membership is not obligatory, it plays a key role in disbursement of social benefits, which incentivises people into becoming a member. Overall, collective bargaining is in its infancy in China – only 40 million workers are covered by collective agreements, and the International Trade Union Confederation does not recognise the All-China Federation of Trade Unions as an independent trade union (ibid.). Nevertheless, collective action is becoming more common in the services and retail sectors, instead of being largely confined to manufacturing (China Labour Bulletin, 2018b).

China’s platform economy is substantial, with a report by the National Development and Reform Commission estimating that 5.5% of China’s workforce takes part in the “sharing economy” (Xinhua, 2017c). This probably reflects the popularity of Chinese platforms for sharing goods like bicycles or umbrellas, rather than individuals actively working via platforms for remuneration. Bike rentals in urban centres have become very popular and even oversaturated in recent years, leading to logistical issues such as abandoned bikes cluttering streets and sidewalks, and the government issuing guidelines on using sharing platforms. For example, Beijing issued guidelines restricting the number of available bicycles, and requiring sharing firms to pay for accident insurance for users (Xinhua, 2017b). Chinese bike sharing platforms like mobike and Ofo are also beginning to spread abroad to Japan, Thailand, and England, among others (Xinhua, 2017a).

Specific collective bargaining has taken place in the platform economy. Didi Chuxing drivers have protested reduced wages, which occurred in the aftermath of Uber leaving the market. Previously with two major taxi platforms competing, each offered drivers large subsidies. Now with Didi Chuxing firmly

in control of the Chinese market, remuneration has dropped substantially. The company eventually held talks with striking drivers, though the outcome is not yet clear (China Labour Bulletin, 2018a).

In summary, it appears that the government supported the development of the platform economy alongside other innovative and entrepreneurial tech start-ups. When problems arise, the government responds with measured regulations, as it did in the case of bike and car rental services, as well as warning Didi Chuxing against lower-than-cost pricing policies to gain a competitive advantage. Similar to the West, drivers for platforms have engaged in strike actions to protest about low wages and other complaints. Outside of this sector, no clear examples of social dialogue have been found.

5.3 India

India is another large market for platforms but has very different conditions than other surveyed countries. Generally speaking, India has very complicated and fragmented labour regulations. To some extent, this may contribute to the fact that India's labour market is largely informal. The ILO found that over 88% of India's total employment is informal: among the highest in the world (Vanek, Chen, Hussmanns, Heintz, & Carré, 2012). In the post-liberalisation era, India has a high reliance on casual and contract labour, and as a result, high job insecurity (Balasubramanian & Dhal, 2017). Unions and collective bargaining are very uncommon in India's large rural and informal sectors. Most unions are concentrated in large enterprises and government sectors. Most labour laws, including those related to collective bargaining, are mostly relevant in the small formal portion of India's economy.

India's large IT sector drives demand as well as supply for online platform workers (Kässi & Lehdonvirta, 2016). Generally, Indian platform workers were found to perform relatively less clerical work and more software work (Berg, Furrer, Harmon, Rani, & Silberman, 2018).

On one popular platform, AMT, workers can only be paid in USD and Indian rupees. Indian workers account for around 18% of AMT workers (Berg et al., 2018). While wages are generally quite low on these platforms by Western standards, wages around \$2 hourly may be viewed as generous in India (Irani & Silberman, 2013). While no union efforts have been found for such platform workers, informal communities including Turkopticon and a number of online resources cater to "Turkers" (ibid.).

With regard to driving and transportation platform work, the market appears to face a few issues. First, personal transportation platforms operated in a regulatory grey zone between their market entry (2010 and 2013 for Ola and Uber, respectively). Following an incident where a traveller reported being molested by an Uber driver in December, 2014, the government began to formulate a response. In October 2015, the Ministry of Road Transport and Highways issued advisory for "Licensing, Compliance and Liability of on-demand Information Technology based Transportation Aggregator". However, this document was largely recommendations, and state governments are responsible for the legislation pertinent to transportation platforms (OECD, 2018b).

Next, the transportation platforms appear oversaturated with workers, which has led to less remuneration, worker frustration and collective actions. Millions of individuals took out loans to begin driving for the largest driving platforms – Ola and Uber – and are now struggling to pay back these loans. Strikes around India have ensued with drivers demanding higher pay. A number of unions, such as the Mumbai Taximen's Union, have supported these actions (The Times of India, 2018).

5.4 Developing countries

Outside of Europe, the United States, China, and India, much less is known about social dialogue in the platform economy. The only clear instances of collective bargaining concerned personal transportation platforms. Otherwise, only 'soft' forms of organisation could be identified.

For one example, Taxify and Uber drivers' held strikes in Kenya based on platforms' alleged failure to abide by a Memorandum of Understanding from 18 July 2018. In 2017, similar strike actions also occurred regarding the amount of remuneration, versus costs that drivers must cover (Mbugua & Kubwa, 2018). Uber drivers also held strikes in Nigeria in 2017 (Okunola, 2017), two years after Uber began offering rides in the country (Fouche, 2016).¹⁵

With regards to online work, Berg et al. (2018) found certain regional patterns. Workers in Latin America predominantly used CrowdFlower, and reported more categorisation and data collection tasks. Asian workers generally used AMT and Microworkers performing tasks related to content access, data collection, surveys and experiments, and transcriptions. Berg et al. (2018) found that very few platform workers discussed platform work issues with unions (5%) or community groups (4%), while a few mentioned a desire for unions to represent them.

Nevertheless, some grievances specific to platform workers in developing countries may be present. Some authors have highlighted that much of the less desirable work related to platforms (e.g. filtering content flagged as offensive and violating terms of service) is undertaken in the Global South, to the benefit of platforms based in the Global North (Gillespie, 2018).

One study conducted 107 interviews and a survey of 658 online freelancers, finding that online freelancers in several countries in Southeast Asia and Sub-Saharan Africa lend themselves to a soft form of organisation (Wood, Lehdonvirta, & Graham, 2018). In this form of organisation, unions are absent and social media groups are predominant. Social media groups are fragmented by nationality, occupation, and platform, but nevertheless allow workers to share information and support one another. Outside of Europe and the United States, no specific unions providing services to online workers were mentioned.

A number of reasons contribute to a lack of social dialogue in the platform economy. First, in less developed nations, it is likely that proportionally fewer individuals are active in the platform economy. Second, traditions of industrial relations may not be comparable with those in the West. Third, wages and conditions may be perceived differently in the Global North versus South; platform workers in the South may earn several times the wage they would otherwise receive in a more traditional job. With relatively high incomes and greater autonomy than traditional forms of labour (Graham et al., 2017), fewer grievances would exist to motivate workers to engage in social dialogue.

5.5 What lessons for the EU?

A few commonalities emerge from the global comparison. From these, the following policy lessons can be derived for the EU.

First, personal transportation platforms are a particular regulatory challenge everywhere. Most instances of platform regulation, social dialogue, and collective action have concerned platform work in this sector. This is partially due to the prominence of personal transportation platforms, and partially

¹⁵ To date, no peer reviewed literature seems to discuss these events.

because barriers to worker organisation are less pronounced in this sector (Kilhoffer et al., 2017). Additionally, transportation platforms disrupt a branch of the economy that traditionally has a strong union presence.

Second, most collective bargaining in the platform economy takes place between workers of a single platform and the platform – not at a sectoral level. This can be explained by a few reasons, but perhaps most important is that platforms are quite new and generally have not been integrated into sectoral bodies for collective dialogue. Additionally, platforms operate very differently from one another, and may even offer different types of platform work opportunities in a single country. This would mean workers have more diverging interests, and are less likely to unite behind a common purpose. Furthermore, platforms may prefer to deal directly with workers and avoid entanglement with collective bodies, which would risk being grouped with traditional businesses that operate on different business models.

Third, formal social dialogue for internet-based platform workers is virtually non-existent. These individuals rely on internet forums and informal resources for information sharing. While information sharing is an important preliminary step towards collective dialogue, it is not indicative of formal organisation.

Lastly, when looking at more global developments, it is observed that platforms are a significant source of economic growth, as demonstrated by the numerous unicorns developed in the United States and China. While the growth primarily benefits the platforms and the countries where they originate, platform workers often stand to benefit. This is particularly true in situations where too few traditional jobs are available, or traditional jobs are low paid. Decision-makers and social partners should take a balanced approach, remaining conscientious of the variety of risks and opportunities associated with platform work.

6. Conclusions and policy recommendations

This report presents comparative findings of the IRSDACE project. Focusing on the issue of industrial relations and social dialogue in the platform economy, it brings together national experiences from seven European countries (Belgium, Denmark, France, Germany, Hungary, Slovakia, Spain) with the perspectives of European social partners and platform workers themselves, while also incorporating global experience (particularly US, China, India).

The national case studies show great variation across the countries studied under IRSDACE. Some countries (e.g. Belgium, Denmark, France and Germany) consider platform work quite important despite its overall negligible – yet growing – extent compared to standard employment practices across all countries, while other countries follow the platform economy as an innovative and technological development only (e.g. Hungary and Slovakia) and some observe the developments and try to adapt existing frameworks to platform work (e.g. Spain). The detailed interviews with European social partners point to a consensus that while remaining at a negligible size, platforms impact many areas of labour markets and hence are on the radar of European social partners. There is also a consensus that some sectors are more impacted than others, such as transport, tourism and cleaning.

In terms of social dialogue, there is a variety of experiences, whereby some countries are clearly frontrunners in platform economy in Europe. For example, France has experienced one of the first instances of social dialogue involving price negotiation between a platform and a workers' union for drivers, which formed in 2016. Denmark saw the first collective agreement between a social partner

and a platform in 2018. In Germany, some existing unions have opened up to include platform workers as their members. In Belgium, social partners have been very engaged in the debate and are trying to reach out to platforms, even though the experience is not always successful. Slovakia is a rare example where a major platform (Uber) joined the employers' association.

The national case studies are themselves a very rich source of data and new findings that are impossible to adequately summarise in this comparative report, so we would like to encourage an interested reader to look at them individually.

To supplement the national case studies, we conducted an online survey among platform workers in Europe with focus on the countries of case studies. Despite the low response rate, the survey results are in line with other similar surveys (e.g. Huws, Spencer, Joyce, & Holts, Kaire, 2016). In terms of industrial relations, the large majority of respondents are not members of trade unions representing platform workers, but more than half of them believe that unions are necessary to support the workers. Half of the individuals are aware of social media and other digital media tools through which platform workers organise themselves.

From the European perspective, some sectoral social partners feel uncomfortable about the relatively *soft* attitude of the EU towards platforms and avoidance of stricter regulations at the EU level. The underlying reasoning for this perspective is that some social partners argue that member states should not be adapting their rules to accommodate new business models, but it is rather the latter which should develop in accordance with the existing rules in the member states.

At the same time, there is a consensus among social partners that attracting new members is becoming a considerable challenge generally and even more so in the platform economy context. New approaches are needed, including expansion of outreach methods, for example by increasing their presence in digital tools and social media. There is also a series of reflections and discussions among social partners on how to better adapt to the situation and attract platform workers as new members. One of the options is to offer social protection to these workers via social partners and membership in unions. On the side of the platforms, there appears to be an overall lack of interest in joining (employer) organisations – possibly due to the fact that the platforms often do not consider themselves as employers – and this, in turn, makes the social dialogue one-sided and difficult.

However, most European social partners agree on the usefulness of a possible social dialogue on the platform economy. In particular, a common European approach is appreciated as a starting point. For example, common rules of registering customers and service providers, transparency on tax rules and so on are among the issues where European coordination of competences could be useful.

The global comparison showed similarities in industrial relations and social dialogue between Europe and elsewhere. Among these are quite frequent collective action and dialogue in the personal transportation platform sector, and a lack of formal worker organisation among online platform workers. On the other hand, important differences are notable. Far more platforms are arising from the US and China than Europe. Furthermore, the desirability of platform work largely depends on characteristics of the local labour market, such as wage levels and job availability. Conflicts emerge more often when a sector is crowded and substantial investment is required for entry. Online platform work may be comparatively lucrative for people living in low-income countries, but often the platform work they perform may be particularly undesirable. Overall, platform work seems to offer both challenges and opportunities wherever it takes place.

The findings suggest a growing awareness – yet to a differing degree in different contexts – among actors engaged with platform work including workers, social partners, public authorities, experts and policy makers. This calls for a better understanding and mapping of the diversity of actors involved as well as their perspectives. In the established industrial relations system across countries, the priorities of social partners – trade unions as well as employers’ organisations – differ between different stakeholders and by sector of activity. As regards interest representation, challenges lie ahead in attracting new members to trade unions and this seems to be even more difficult in the case of platform workers.

In terms of the policy implications of this research, the IRSDACE project points in several possible directions.

First of all, policy-makers and social partners at the national level can look for ways to link interest representation to social protection and/or labour law to attract platform workers to engage in social dialogue through trade union membership. Similarly, platforms could be encouraged to join organisations to take part in social dialogue. This could be made more interesting for them if social dialogue is construed more broadly to include policy concerns of platforms and workers going beyond working conditions. If (tripartite) social dialogue were an effective venue for policy debates about the platform economy, the incentives for all actors to take part would be greatly strengthened.

Moreover, to foster social dialogue, existing social partners as well as new forms of organisations among workers or employers should be encouraged. In this context, in particular the newly created organisations face funding issues and could be supported by the EU.

At the European level, the EU could lead the way globally in developing minimum standards for every worker and types of employment with regards to working conditions and the concerns raised by platform workers. This would require a carefully calibrated balance between accepting genuinely new aspects of the platform work and not accepting that it necessarily means the end of ‘good’ employment. However, this is also predicated on a successful organisation of online platform workers at the EU level – a position advocated, for example, by the ETUC and Sharers & Workers.

More technically, as digitalisation expands to the world of labour, it is also spreading into the world of social dialogue. This implies an increase in the use of social media and other digital tools in connecting workers in a virtual space of social dialogue.

Last but not the least, from the research perspective, more effort on collecting and/or sharing representative data is desired. This would allow study of platform economy issues using sound statistical and modelling tools so as to conduct more rigorous and causal analysis than that achievable using case studies and unrepresentative surveys.

References

- Arcade City. (2018). Arcade City Whitepaper 1.82. Retrieved September 26, 2018, from https://docs.google.com/document/u/1/d/1M6W0mgV6a_88QelEdAhwg73a3lYj5OBFew38Y1e-Rfc/edit?usp=embed_facebook
- Balasubramanian, G., & Dhal, M. (2017). Industrial Relations Situation in India: A Report. *Japan Labor Issues*, 1(3), 10.
- Berg, J., Furrer, M., Harmon, E., Rani, U., & Silberman, M. S. (2018). *Digital labour platforms and the future of work | Towards decent work in the online world* (p. 157). ILO. Retrieved from https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms_645337.pdf
- China Labour Bulletin. (2018a). Didi drivers in China protest pay cuts and restrictive work practices. Retrieved September 27, 2018, from <https://www.clb.org.hk/content/didi-drivers-china-protest-pay-cuts-and-restrictive-work-practices>
- China Labour Bulletin. (2018b). Identifying the trends in workers' collective action 2015-17. Retrieved September 27, 2018, from <https://www.clb.org.hk/content/identifying-trends-workers%E2%80%99-collective-action-2015-17>
- ESDE. (2018). *Employment and Social Developments in Europe*. Publications Office of the European Union.
- European Commission. (2016a). *A European Agenda for the collaborative economy* (No. COM(2016) 356 final). Brussels.
- European Commission. (2016b). *Communication on online Platforms and the Digital Single Market Opportunities and Challenges for Europe* (No. COM(2016) 288/2). Brussels.
- Evans, P. C., & Gawer, A. (2016). The rise of the platform enterprise: a global survey.
- Fouche, G. (2016, October 13). Uber booms in Nigeria, eyes expansion to French-speaking West Africa. *Reuters*. Retrieved from <https://www.reuters.com/article/us-uber-nigeria-idUSKCN12D1XQ>
- Gillespie, T. (2018). *Custodians of the Internet: Platforms, content moderation, and the hidden decisions that shape social media*. Yale University Press.
- Graham, M., Lehdonvirta, V., Wood, A., Barnard, H., Hjorth, I., & Peter Simon, D. (2017). The Risks and Rewards of Online Gig Work At the Global Margins.
- Huws, U., Spencer, N. H., Joyce, S., & Holts, Kaire. (2016). Crowd work in Europe: Preliminary results from a survey in the UK, Sweden, Germany, Austria and the Netherlands. *Commissioned Report, Foundation for European Progressive Studies*.
- Irani, L. C., & Silberman, M. S. (2013). Turkopticon: interrupting worker invisibility in amazon mechanical turk. In *Proceedings of the SIGCHI Conference on Human Factors in Computing Systems - CHI '13* (p. 611). Paris, France: ACM Press. <https://doi.org/10.1145/2470654.2470742>
- Kässi, O., & Lehdonvirta, V. (2016). Online labour index: measuring the online gig economy for policy and research.
- Kilhoffer, Z., Lenaerts, K., & Beblavý, M. (2017). *The Platform Economy and Industrial Relations: Applying the old framework to the new reality* (CEPS Research Report No. 2017/12). Brussels.
- Mbugua, N., & Kubwa, C. (2018). Uber, Taxify drivers plan Tuesday strike to press for higher fare rates. *The Star, Kenya*. Retrieved from http://www.the-star.co.ke/news/2018/09/14/uber-taxify-drivers-plan-tuesday-strike-to-press-for-higher-fare-rates_c1818920

- OECD. (2018a). OECD Statistics: Trade Union Density. Retrieved September 26, 2018, from <https://stats.oecd.org/Index.aspx?DataSetCode=TUD>
- OECD. (2018b). *Taxi, ride-sourcing and ride-sharing services - Note by India*. OECD _ Directorate for Financial and Enterprise Affairs Competition Committee. Retrieved from [https://one.oecd.org/document/DAF/COMP/WP2/WD\(2018\)23/en/pdf](https://one.oecd.org/document/DAF/COMP/WP2/WD(2018)23/en/pdf)
- Okunola, F. (2017). Uber drivers have declared a strike, protest 40% price cut. *Pulse Nigeria*. Retrieved from <https://www.pulse.ng/news/tech/uber-drivers-have-declared-a-strike-protest-40-price-cut-id6644479.html>
- Silberman, M. S., & Irani, L. (2016). *Operating an employer reputation system: lessons from Turkopticon, 2008–2015*. University of California, San Diego (UCSD). Retrieved from https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2729498
- The Times of India. (2018). Uber, Ola drivers threaten indefinite strike from Sunday. *The Times of India*. Retrieved from <https://timesofindia.indiatimes.com/business/india-business/uber-ola-drivers-threaten-indefinite-strike-from-sunday/articleshow/63344353.cms>
- Traub-Merz, R., & Zhang, J. (2010). Comparative Industrial Relations: China, South-Korea and Germany/Europe. *Friedrich Ebert Stiftung*.
- Vanek, J., Chen, M., Hussmanns, R., Heintz, J., & Carré, F. (2012). Women and men in the informal economy: A statistical picture. *Geneva: ILO and WIEGO*.
- Wood, A. J., Lehdonvirta, V., & Graham, M. (2018). Workers of the Internet unite? Online freelancer organisation among remote gig economy workers in six Asian and African countries. *New Technology, Work and Employment*, 33(2), 95–112. <https://doi.org/10.1111/ntwe.12112>
- Xinhua. (2017a). Spotlight: China's sharing economy could drive global growth. Retrieved September 26, 2018, from http://www.xinhuanet.com//english/2017-08/13/c_136522143.htm
- Xinhua. (2017b). Beijing issues guideline on bike sharing. Retrieved September 26, 2018, from http://www.xinhuanet.com//english/2017-09/15/c_136612435.htm
- Xinhua. (2017c). 5.5 pct of China's labor force work in sharing economy: report. Retrieved from http://www.xinhuanet.com//english/2017-09/18/c_136618778.htm