
(IN)FORMALISATION IN DIGITAL LABOUR PLATFORMS

Pending challenges for workers in low- and middle-income countries
(LMICs)

Alejandra Villanueva Ubillús & Huib Huyse

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Acronyms

AFPs	Pension Funds Administrators
ASU	Universal Health Coverage
ATU	Urban Transport Authority for Lima and Callao
CNSS	National Social Security Fund
CNTPE	National Labour and Employment Promotion Council
CSO	Civil Society Organisation
GDP	Gross Domestic Product
ILO	International Labour Organisation
LGBTQ+	Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and other orientations
LMICs	Low- and middle-income countries
NGO	Non-Governmental Organisation
ONP	Pension Standardisation Office
OSCPA	Trade Union Organisation of Professional and Self-Employed Drivers
PLP	Complementary Bill of Law
SINTRAPLADI	National Union of Digital Platform Workers of Peru
SIS	Integral Health Insurance
SMNEs	Micro, Small, and Medium Enterprises
SUNAFIL	National Superintendency for Labour Inspection
TST	Superior Labour Court
USD	United States Dollar
WSM	We Social Movements

PART 1 FORMALISATION OF DIGITAL LABOUR PLATFORMS: SETTING THE SCENE AND MAPPING THE LANDSCAPE

1 INTRODUCTION

Over the past decade, digital labour platforms have transformed the way work is organised, accessed, and paid worldwide. These platforms are defined by offering services via digital technologies, linking individuals, organisations, and businesses in return for payment (Realising Decent Work in the Platform Economy, 2024). Additionally, these services can be delivered either online or in person at specific geographic locations (Ibid.).

While platform work is rapidly expanding, research on its impact on workers' rights and livelihoods in low- and middle-income countries (LMICs) remains limited. Most studies and regulations focus on high-income nations, often neglecting the experiences of platform workers in regions like Sub-Saharan Africa, Southeast Asia, and Latin America in global policy discussions. This gap is especially significant now as the International Labour Organisation (ILO) moves toward adopting a new Convention on decent work in the platform economy.

In August 2025, the ILO released a summary of key points from the June 2025 International Labour Conference (ILC), along with a draft Convention and Recommendation, inviting further input from governments and social actors. A final Convention is anticipated to be approved by the ILO in June 2026. This report seeks to contribute to that process by exploring the main challenges and strategies faced by workers and other stakeholders involved in governing digital labour platforms in four LMICs. Accordingly, this study focuses on the following question: *How do digital labour platforms contribute to or restrict workers' transition to the formal economy and their access to social protection?*

To address this question, the study adopts a qualitative approach combining documentary review, secondary data analysis, and semi-structured interviews. After a review of the literature, the research was structured in three phases. First, a broad mapping of trends in digital labour platforms was conducted based on the Fairwork¹ dataset, which is among the largest open-source collections on working conditions in the platform economy. During the second phase, a comparative analysis of regulatory frameworks in eight LMICs was executed: Argentina, Chile, Mexico, Uruguay, India, Malaysia, Singapore, and Kenya. These cases were selected to i) reflect a diversity of regional contexts, and ii) highlight experiences where regulations have already been approved and rolled out in LMICs.

Finally, in phase 3, four case studies were conducted based on the experiences of workers on digital labour platforms in Brazil, Peru, Indonesia, and Burkina Faso. In addition to regional diversity, these cases involve countries with important partner organisations, relevant to the study's commissioners. This phase included 21 semi-structured interviews with civil society organisations (CSOs), trade union representatives, researchers, public officials, and company representatives (Annex 1). In accordance with KU Leuven's guidelines on Privacy and Ethics, participants' information is anonymised.

The study comprises three sections. The first section reviews the conceptual and empirical context, defining digital labour platforms, their main features, and debates on how these tools can facilitate

¹ Based on a selection of 26 low and middle income countries from the total of 38 countries in the Fairwork dataset (www.fair.work)

labour formalisation. Based on these debates, it proposes an analytical framework. It then presents evidence on decent work in LMICs based on the Fairwork dataset. Lastly, it explores recent efforts to regulate digital labour platforms in LMICs, highlighting the variety of regulatory approaches being designed to formalise sector workers and their impact on workers' rights coverage.

Part 2 presents the four country case studies, based on the proposed analytical framework. Finally, part 3 synthesises cross-cutting findings and presents recommendations in view of the upcoming ILO Convention negotiations.

Although the researchers acknowledge that in digital platform literature and regulations, users are primarily called 'gig workers', 'partners', and 'service providers', in the context of the upcoming ILC, this study refers to them as workers, emphasising their status as rightsholders.

This study is commissioned by WSM, ACV-CSC International, and the International Network for Social Protection Rights (INSP!R network). The researchers would like to thank Roland Sawadogo for his support in data collection and analysis for Burkina Faso, and Ingrid Wozniak Lopez for her assistance in analysing the Fairtrade data set. Finally, the researchers would like to thank their interviewees for their time and expertise.

2 FORMALISATION IN DIGITAL LABOUR PLATFORMS: SETTING THE SCENE

2.1 What is a digital labour platform?

When discussing digital labour platforms, the first challenge that arises concerns their definition, as there is no internationally agreed-upon terminology. Terms such as ‘gig economy,’ ‘sharing economy,’ and ‘collaborative economy’ are used interchangeably, highlighting the conceptual uncertainty surrounding the subject (APEC, 2021; European Council, 2025; Realising Decent Work in the Platform Economy, 2024).

This ambiguity reflects contrasting views about the merits of these platforms. The ‘gig economy’ is often associated with precarious labour arrangements, characterised by short-term jobs and pay-per-task models (UNDP, 2025). In contrast, the ‘sharing economy’ emphasises how workers, despite not owning resources, gain access to shared assets like equipment and infrastructure to participate in the labour market (APEC, 2021). For the purposes of this study, we adopt the ILO’s definition of digital labour platforms as:

A natural or legal person that organises, in whole or in part, the provision of a service through digital technologies (i) upon request of the recipient of the service; (ii) and involving the performance of work by a person for remuneration, regardless of whether that work is performed online or in a geographic location (ILO, 2025a).

This definition underscores three key characteristics. First, digital technology serves as the central mechanism to organise and/or facilitate work performed by persons for remuneration or payment (Ibid.). As such, these platforms stand out for their role as **intermediaries** either by facilitating work opportunities through the platform, establishing contractual relationships with workers, or participating in the subcontracting chain between the platform and the worker (Ibid.).

Second, digital labour platforms exemplify an **algorithmic approach to labour management**, relying on digital data extracted from transactions and communications for intermediation (Arriagada et al., 2023; Bonini & Treré, 2024). Platform owners use machine learning models to train algorithms to coordinate and manage workers in real time, aiming to boost operational efficiency and workforce performance (Bonini & Treré, 2024). This same data is also used to monitor and rank workers, which has become a major source of contention (see [Part 2](#)).

Finally, digital labour platforms encompass a wide range of activities depending on the type of work and its location. Typically, these platforms are categorised as either **online platforms** (work performed online or remotely, such as virtual assistance and software programming) or **location-based platforms** (physical services like deliveries, hail-riders, tasks, and domestic work)

(Realising Decent Work in the Platform Economy, 2024). This study focuses on this second type of platform, although online platforms have extended their presence in the Global South, including the countries examined here (Anwar & Graham, 2021).

2.2 Location-based platform work in settings of restricted labour demand

Over the past decade, location-based platforms have grown exponentially, with market estimates placing their value at over USD 190 billion (Bonini & Treré, 2024). This rapid expansion is a global phenomenon that actively involves developing regions: 12% of platforms originate in ‘emerging markets’ such as India, China, Brazil, and Kenya (Realising Decent Work in the Platform Economy, 2024). Recent studies identify several drivers behind the surge of digital platforms in low- and middle-income countries, including rapid urbanisation and evolving transportation needs (Arriagada et al.), increased smartphone and internet accessibility (UNDP, 2025), heightened ICT investment in Africa and Asia (Anwar & Graham, 2021; Realising Decent Work in the Platform Economy, 2024), and labour market disruptions caused by the Covid-19 pandemic (APEC, 2021; UNDP, 2025), which positioned digital platforms and gig economy jobs as crucial lifelines.

Although official surveys show that, in most countries, the share of workers employed through location-based platforms remains in the low single digits, this proportion is increasing (Realising Decent Work in the Platform Economy, 2024). For instance, between 2022 and 2024, the number of people working on digital labour platforms in Brazil grew by 25.4%, accounting for 1.9% of the total population employed in the private sector (Gomes & Peters, 2025).

The growing number of workers turning to digital platforms underscores the sector’s accommodating nature, as these tools are notable for their low entry barriers. Although workers’ profiles may vary from country to country, reports point to shared characteristics: young people with limited work experience and basic or intermediate education (Realising Decent Work in the Platform Economy, 2024; Souza, 2026; UNDP, 2025). Digital platforms also represent an important livelihood for vulnerable populations. Globally, 17% of platform workers are migrants, with this group rising to 38% in high-income countries (Realising Decent Work in the Platform Economy, 2024). Women’s participation has also grown in recent years (Arriagada et al., 2023; DFS LAB; RISE, 2023; Magalhães dos Santos, 2023). The participation of vulnerable populations has been celebrated for the potential of digital platforms to improve workers’ socioeconomic conditions (Anwar & Graham, 2021). In Indonesia, for instance, digital platforms have facilitated labour market entry for women and youth, and improved women’s perceptions of their social status (DFS LAB; RISE, 2023).

Nonetheless, the apparent inclusivity does not mean that platform work exclusively attracts vulnerable populations, nor does it shield these groups from discrimination and exploitation. Recent studies note a rising presence of highly educated professionals on platforms in Latin America, reflecting a broader crisis in traditional labour markets (Arriagada et al., 2023; Gomes & Peters, 2025). Platform work has also been found to reinforce structural racial and gender inequalities already found in the traditional labour market: from black and *pardo*² men overrepresented amongst delivery workers (Gomes & Peters, 2025), to women mainly

² In the context of Brazil, *pardo* is defined as a self-identified category for people of mixed racial ancestry (especially European, African, and Indigenous origins).

concentrated in retail trade, administration, and household services (Hunt & Samman, 2020; Realising Decent Work in the Platform Economy, 2024).

The following sections present the main definitions and debates that will serve as an analytical framework for this study, providing details on the main dilemmas digital labour platforms currently pose for improving workers' conditions, as well as the opportunities to formalise work in low- and middle-income countries.

2.3 (In)formalisation of labour conditions

Informality broadly refers to economic and social activities that occur outside the government's regulatory framework. From an economic perspective, it is commonly associated with 'unregulated' practices where individuals or firms operate without adhering to official rules, labour regulations, or tax systems (Polese, 2023). Therefore, the informal economy is highly heterogeneous as informal work can take many forms (self-employed workers, waged workers, household workers) (ILO, 2023c). Likewise, the informal economy does not always present a clear dividing line between formal and informal practices and actors, as registered businesses producing legal goods and services may not always comply with legal requirements, thriving on the back of informality (ILO, 2023c; Resolution Concerning Decent Work and the Informal Economy, 2002).

Informality is frequently used to describe labour markets in the Global South, where it often constitutes a defining feature rather than an exception (Benanav, 2019). In emerging and developing economies, informal activities sustain the livelihoods of large segments of the population. The World Bank estimated that in emerging market and developing economies, informal employment accounts for about 70% of total employment, with some economies in Sub-Saharan Africa (SSA) exceeding 90% (ILO, 2025b). In Asia and Latin America and the Caribbean (LAC), informality has remained at around 68% and 50%, respectively, despite policy efforts to reduce it (OIT, 2025b). Although informal work is mainly prevalent in rural areas (60%), precarious and informal labour arrangements have become the norm in many cities of the Global South, due to rapid urbanisation, limited state capacity, and economic structures that rely heavily on self-employment and non-regulated forms of work (Manky & Mogollón, 2024).

The persistence of large informal sectors in the labour market has important economic and social consequences. At the macro level, high informality has been associated with lower productivity, higher risk of poverty incidence, reduced access to finance, slower accumulation of human and physical capital, and limited fiscal revenues for governments (Benanav, 2019; Ohnsorge & Yu, 2022). Simultaneously, informal work can serve a dual purpose: while it offers a temporary safety net during economic downturns like the recent COVID-19 pandemic, informal workers are typically excluded from national statistics, social security systems, and workplace protections, facing greater risks from shocks and income instability (OECD, 2023; What Is Informal Employment? ILO Brief, 2023). For these reasons, development organisations have stressed the importance of gradually formalising economic activities while reducing the vulnerability of workers who rely on the informal economy (OECD, 2023; Resolution Concerning Decent Work and the Informal Economy, 2002).

For the purpose of this study, when referring to 'informal work' or 'informal labour', we follow the ILO's definition, which aims to capture all unprotected workers in formal and informal economic activities:

Informal employment refers to working arrangements that are in practice or by law not subject to national labour legislation, income taxation, social protection, or entitlement to other employment guarantees (Resolution Concerning Decent Work and the Informal Economy, 2002).

By contrast, adapting from ILO's definition, the formalisation of informal work would refer to:

Public or private frameworks that promote i) the transition of workers from informal to the formal economy while respecting workers' fundamental rights; ii) the creation, preservation, and sustainability of decent jobs; and iii) the prevention of informalisation of formal work (Resolution Concerning Decent Work and the Informal Economy, 2002).

Formalisation opportunities

In settings where informal economic activities and employment are prevalent, digital labour platforms are seen as beneficial for creating job opportunities through tools managed by registered companies (Azuara et al., 2025; DFS LAB; RISE, 2023; Vanderpuye, 2023). The literature highlights four additional ways these tools can support the formalisation of labour conditions in highly informal environments.

- a) **Financial inclusion and increased traceability of monetary transactions:** between 2011 and 2025, the percentage of adults in LMICs who own an account with a bank, mobile money provider, or other financial institution rose from 28% to 79%, indicating remarkable progress in financial access (Klapper et al., 2025). Digital labour platforms have played a significant role in this transformation by requiring workers to set up accounts to receive and track payments (DFS LAB; RISE, 2023). Furthermore, data from digital money transactions now serve as an important resource for governments, providing opportunities for more effective tax collection from workers in the informal sector whose incomes have historically been underreported (INSP!R Asia, n.d.).
- b) **Taxation of local subsidiaries:** taxing the companies behind digital labour platforms has been a key motivation for developing legal frameworks to regulate these businesses. Such regulations require platforms to establish local subsidiaries and factor tax obligations into their fare structures (Azuara et al., 2025). By mandating local legal representation, these measures facilitate interactions between platforms, governments, and workers while also ensuring that platforms pay corporate taxes. This helps level the playing field by reducing unfair competition with local companies and organisations that already pay taxes and offer similar services.
- c) **New avenues for social protection:** the rise of digital labour platforms has created new pathways for financial and fiscal inclusion, enabling innovative mechanisms to channel resources toward social contributions for workers. LMICs are experimenting with both voluntary and mandatory tax schemes to extend social insurance coverage to self-employed and independent workers (see [Chapter 3](#)).

- d) **Standardisation and compliance in informal services: beyond taxation, digital labour** platforms have driven a surge of regulations - including requirements for worker registration and vehicle standards - as well as private service standards such as safety protocols for workers and clients. These developments have been well received in sectors historically neglected by public authorities due to limited incentives or state capacity, such as transportation (Azuara et al., 2025; Manky et al., 2024).

2.4 Key debates in the formalisation of labour in location-based platforms

The potential contributions outlined above are not uniformly spread across geographies and sectors, nor are they a given. For the expansion of these technologies to translate into concrete benefits for workers, sociopolitical consensus and agreements are necessary on five key debates: how to define the relationship between workers and platforms, who should protect workers' rights; to what extent and under what conditions these tools might worsen in-country inequality instead of helping to reduce it; and how to deal with the gaps in social protection coverage of platform workers. This section elaborates briefly on each of these debates.

2.4.1 Flexible vs. controlled work: what are the implications for workers' status?

One of the most debated questions in the formalisation of work in digital labour platforms is whether the workers who power them should be legally recognised as independent contractors or employees (Azuara et al., 2025; Realising Decent Work in the Platform Economy, 2024; Sáenz Leandro, 2025). Beneath what appears to be a mere normative issue lies a deeper dispute: the degree to which workers exercise decision-making power over their time, tasks, and working conditions when accessing work opportunities through these tools.

A key feature of platform work is its flexibility, allowing workers to balance activities such as work, studies, and home care, and to pursue multiple income streams, including through multi-apping (Fairwork, 2025c; Putri et al., 2023; Sáenz Leandro, 2025). However, these narratives of freedom and independence have been challenged. Platform workers tend to work more hours than both formal and informal workers to earn a sufficient daily income, yet are not compensated for waiting time between requests (De Becker et al., 2024; Putri et al., 2023). They also cover their own expenses for tasks, including purchasing necessary equipment, and manage work-related risks, such as covering accident costs (Putri et al., 2023).

Besides the hidden costs of labour, there is the issue of control. Although platforms largely rely on algorithms to organise work, this technology is not neutral. Platform companies are known for lacking algorithmic transparency, choosing not to disclose the conditions under which workers are rewarded or penalised (Bonini & Treré, 2024; Souza, 2026). Conversely, they rely on gamification strategies that incentivise workers to complete tasks to increase their income. While workers may choose whether to use these incentives or not, not using them can lead to algorithm discrimination, receiving fewer assignments, or visibility in the platform (Putri et al., 2023).

The lack of recognition of employment status has further repercussions for social protection, since traditional labour systems are designed for full-time employment. While platform work might be classified as part-time, depending on the situation, the hours worked could also be too few to qualify for social security coverage (De Becker et al., 2024). Despite the significant impact of employment status on the formalisation of workers' conditions on digital platforms, the ILO has not established a definition of employees, offering only recommendations (Recommendation no. 198) (Silaban, n.d.).

2.4.2 Employer vs. intermediary: who covers the costs for worker protection?

Closely related to the issue of employment status is how platform companies position themselves concerning the workers whose services they facilitate. Platforms have consistently maintained that they operate as technological intermediaries connecting the supply and demand for work, rather than as employers (ILO 2025/2024) (Bonini & Treré, 2024). This self-definition has direct implications for workers' protections, as it has enabled platforms to use it as a legal strategy to avoid enforcement of employment laws across jurisdictions (see [Chapter 3](#)).

The terminology used across legal systems to describe these entities reflects this ambiguity. While European countries use terms like 'digital platforms' or 'digital labour platforms,' other regions employ phrases such as 'digital service platform company' (Chile) or 'aggregator' (India), each with distinct regulatory implications (Realising Decent Work in the Platform Economy, 2024). The reference to the mediating role of technology, which forms the basis for companies' self-categorisation, contrasts with workers' experience of control through these tools.

In their study of Chilean hail-drivers, Arriagada et al. (2023) observe how, despite platforms distancing themselves from employer status, they make unilateral changes to payment conditions and 'disconnect' workers - many of whom were union members - without formal justification, an action that would be legally prohibited under employment law. The intermediary framing is further complicated by the level of control platforms exercise through data collection and algorithmic management. Platforms - not workers - set prices, use geolocation and personal data to assign tasks, and evaluate performance through rating systems (Arriagada et al., 2023; Bansal, 2025).

The effect of the 'intermediary' label on digital platforms is that the costs of worker protection are borne by workers themselves or by public systems not designed to absorb them. Without an employer legally obligated to contribute to social protection, platform workers remain vulnerable, depending on fragmented and/or voluntary social protection mechanisms (Azua et al., 2025).

2.4.3 Atomised work vs. worker representation

The structural conditions under which platform work is organised profoundly affect workers' capacity to act collectively. The design logic of digital labour platforms, premised on coordinating atomised individuals via an interface, tends to deepen labour isolation, with broader implications for workers' ability to organise and advocate for the recognition of their rights (Frey, 2020).

Labour flexibilisation has historically been associated with the erosion of collective labour institutions: reduced long-term contracts, diminished employer benefits, and restricted collective bargaining (Frey, 2020; Manky, 2025). A key mechanism through which platforms reinforce individualism is atomisation. Because platform workers rarely share a physical workspace and

client interaction occurs primarily through digital interfaces, collective identification is structurally impeded. As a result, digital labour platforms contribute to the normalisation of solitary working, stripping away the conditions for meaningful peer interaction and collective organisation (Frey, 2020). As noted by Hunt and Samman (2020), workers' right to organisation and collective representation can also be negatively affected due to the lack of recognition of the status of workers, with legal frameworks in countries like South Africa excluding workers from digital platforms from the rights of freedom of association, collective bargaining, protection against discrimination, or unfair dismissal. Thus, how digital platforms and platform workers are defined in legal frameworks has larger implications beyond the individual rights of these workers.

2.4.4 Livelihoods means vs. means of labour precarity

Beyond the role of digital platforms in income diversification and generation, the literature on these tools calls for greater nuance regarding their role in the destandardisation of work and employment, and how they challenge labour markets and welfare state institutions (Beckmann et al., 2026; Frey, 2020; Manky, 2025). There are at least three ways in which digital platforms negatively affect them.

First, they can help deepen pre-existing inequalities through discriminatory algorithmic systems that amplify biases in gender, race, and migration status. Arriagada et al. document how, in Chile, Venezuelan migrant workers are channelled into food delivery platforms that offer easy entry to the labour market but no social protection. Although ride-hailing platforms provide more legal protections, they have stricter requirements that effectively exclude migrants, such as having a driving license tied to a visa.

Gender discrimination operates through similar dynamics. In Brazil, women working for food delivery apps have been found to face penalties for directing deliveries to common areas of condominiums and commercial units instead of entering private areas - a security measure they use to avoid being subjected to assault and other acts (2023; Magalhães dos Santos, 2023). Similarly, Fairwork (Fairwork, 2025c) reports the worsening of gender-based violence and harassment experienced by women platform workers in Brazil, exposing the heterogeneous nature of platform work and the intersectional experience of worker discrimination (Magalhães dos Santos, 2023). A second way that digital platforms can contribute to labour precarity involves risk exposure. Proprietary algorithm conditions not only protect companies from revealing how they assign tasks, but they also have been shown to encourage workers to take on higher risks by offering payment incentives for accepting tasks in questionable areas or during weather conditions that increase danger, including injuries after long hours of work (Bansal, 2025).

Finally, there are the financial systems provided by digital platforms to help workers cover work-related costs. In LMICs such as Brazil, Ghana, and Nigeria, companies are increasingly offering loans and advance-payment options to workers to purchase equipment, such as vehicles (Fairwork, 2025c), which can trap them in a cycle of debt. In practice, this may mean workers have to pay fees to access their earnings or face deductions that leave them with negative balances (see [Part 2](#)). Without direct oversight, these loan schemes can become a means of financial exploitation for workers already facing economic hardship.

It is important to recognise that these mechanisms of precarity do not operate uniformly across all contexts, as the different economic and social power of workers can lead to varying levels of vulnerability (Novianto et al., 2023, p. 72). Similarly, even within the same context and on the same

platforms, workers can face different levels of risk, as seen in the case of women and migrants and how they are affected by discriminatory platform policies. The intersectional and context-dependent nature of risk in digital labour platforms serves as a reminder of the importance of wider debates and international agreements on these issues to address the diverse challenges in labour formalisation (Frey, 2020), extending beyond those seen in developed countries.

2.4.5 Social protection: a key missing piece

Social protection coverage for digital labour platform workers in the Global South remains limited and uneven (APEC, 2021; Realising Decent Work in the Platform Economy, 2024). The ILO defines social protection, or social security, as a set of public initiatives aimed at shielding individuals and households from economic and social risks that threaten their well-being (ILO, 2023a). This includes all cash or in-kind benefits designed to protect against income loss or inadequacy stemming from events such as sickness, disability, maternity, work-related injuries, unemployment, old age, or the death of a family member. It also covers issues such as limited access to healthcare, inadequate family support, and broader poverty or social exclusion (Ibid.). Social protection systems mainly target two areas: income security and healthcare access. These systems generally combine contributory schemes, like social insurance funded by workers and employers, with non-contributory benefits financed through taxes, including social assistance for vulnerable populations (Ibid.). Countries typically integrate these approaches to address various risks over a person's lifetime, offering benefits in the form of periodic payments or one-time transfers.

International labour standards guide countries in creating inclusive social protection systems. The Social Security (Minimum Standards) Convention, 1952 (No. 102), gives governments flexibility in deciding who is protected, broadly including employees, economically active populations, or residents rather than strictly legal employment categories (Realising Decent Work in the Platform Economy, 2024). Additionally, the Social Protection Floors Recommendation, 2012 (No. 202), emphasises universality and social inclusion, explicitly recognising the importance of extending protection to people working in the informal economy through social solidarity (Ibid.). Therefore, development organisations advise a gradual approach to building comprehensive systems: starting with a basic social protection floor that ensures essential health care and minimum income security, then expanding to broader, more adequate benefits through contributory schemes and voluntary insurance (APEC, 2021).

In the case of social protection coverage for digital labour platform workers, a central barrier is the classification of these workers. As noted earlier, there is a strong tendency to categorise them as self-employed or independent. This classification significantly impacts social protection, often excluding these workers from social security schemes designed mainly for traditional employees: those legally bound to an employer (De Becker et al., 2024; Kool et al., 2021).

Furthermore, there are informational and behavioural barriers. Platform workers tend to have low willingness to voluntarily contribute to social protection programmes and often lack awareness of the long-term benefits for disability or retirement (APEC, 2021; Azuara et al., 2025). These issues are particularly relevant in platform work, where earnings can be unpredictable and, depending on the context, workers may use platform work as a short-term income source or a supplementary job (see [Part 2](#)). Additionally, the fragmented nature of platform work - where individuals may work for multiple platforms at once or combine platform work with other jobs - makes it challenging to

determine which platform(s) should be responsible for contributions and to create systems suited to these mixed employment patterns (De Becker et al., 2024; Kool et al., 2021).

The combination of barriers leads to uneven integration of platform workers into social protection systems. For example, a recent study of Uber drivers in Latin America found that only one-third contributed to a pension scheme, with countries such as Mexico reporting that over 80% of drivers were non-contributors (ILO, 2023a). Regarding health coverage, there was a wide disparity among selected countries, with the Dominican Republic and Colombia showing over 70% coverage, while others, such as Ecuador, had around 35% (Ibid.). These disparities highlight both the diversity of institutional contexts and the uneven effectiveness of existing policies in integrating platform workers into social protection systems. As labour digital platforms continue to emerge in LMICs, the challenge is securing access to social protection that does not depend on full employment status.

2.5 Analytical framework

Considering the new work arrangements introduced by digital labour platforms and their impact on defining labour relationships and workers' rights within these digital systems, this study aims to analyse the opportunities and challenges presented by platforms and related regulations across five dimensions of formalisation for platform work, as outlined in the analytical framework in Table 2.1.

TABLE 2.1 Dimensions for the formalisation of digital platform workers

Dimension	Questions
1. Legal recognition of work relationship	<ol style="list-style-type: none"> 1. Are there specific laws, regulations, or policy initiatives governing digital labour platforms? Does it recognise a work relationship between the worker and the platform? 2. If regulations exist, do they classify platforms as employers? 3. Who do the platforms consider as 'workers'? Do they cover forms of 'autonomous' or 'flexible' work (part-time or multi-apping)? 4. If there is no legal framework in place, what have been the main challenges in establishing one? 5. If there is a legal framework, does it recognise a minimum wage for platform workers? Under what conditions?
2. Social protection	<ol style="list-style-type: none"> 6. What forms of social protection are available to platform workers? Are these required by law? Who bears the cost? 7. In cases where social protection laws exist, what is needed to better enforce them? 8. Have there been any recent changes or innovations, such as labour movement initiatives, voluntary schemes, or the use of digital tools, that could improve social protection for platform workers?
3. Anti-discrimination measures	<ol style="list-style-type: none"> 9. What type of worker profile is attracted to platform labour? Who do platforms target? 10. Do platforms showcase discriminatory clauses based on gender, nationality, or other? 11. Do national regulations include anti-discriminatory measures?
4. Transparency	<ol style="list-style-type: none"> 12. Can the data collected by platforms' algorithms result in workers being disconnected or reprimanded in any form? 13. Do legal frameworks or law projects support larger algorithm transparency? How?
5. Worker representation	<ol style="list-style-type: none"> 14. Have platforms or other stakeholders tried to impede the creation of unions for platform workers? What was the response of policymakers and other actors? 15. What roles could trade unions or worker organisations play in promoting social protection for platform workers?

3 PLATFORM WORK IN LMICS: MAPPING THE LANDSCAPE

3.1 Estimates of decent work and informality

An increasing number of studies have documented the working conditions of platform workers, often focused on the situation in high-income countries (Bonini & Treré, 2024; De Becker et al., 2024; Loonam & O'Regan, 2022; Orr et al., 2023; Soeiro et al., 2025). While many studies limit themselves to specific countries and sectors, the Fairwork initiative can be considered the most comprehensive attempt to measure the working conditions across different types of platforms and regions in a longitudinal way. Since 2019, Fairwork rates multiple platforms in 38 countries based on a uniform assessment framework, entailing five overarching principles of fair work (see Box 1). For this research, a screening of the scores and corresponding research reports for 25 low- and middle-income countries (LMIC)³ and two high income countries in Latin America (Chile and Uruguay) was conducted to gain broad insights in key trends across regions and platforms. Aside from an overall analysis, we zoom in on Principle 2 (Fair Conditions), which has sub-principles that include an assessment of whether platforms provide social protection features (P2.2: Social Safety Net).

BOX 1 FAIRWORK'S ASSESSMENT FRAMEWORK

Fairwork assesses labour platforms against a transparent framework for 'fair work', tailored to location-based services⁴ such as ride-hailing, delivery, domestic work and care. The methodology combines three evidence sources: desk research, interviews with platform management, and confidential interviews or surveys with workers. Researchers review contracts, terms of service, public policies, app interfaces and dispute histories; then seek documentary evidence from companies; and finally gather worker testimony to verify how policies operate in practice. Scores are awarded against five principles, with each principle having two escalating thresholds, covering different aspects of the principle, allowing a maximum score of 10 points.⁵

Principle	Sub-principle	Explanation
P1.1: Fair Pay	Local Minimum Wage	Workers earn at least the legal minimum wage after work-related costs.
P1.2: Fair Pay	Local Living Wage	Workers can earn enough to meet basic living needs.

³ Albania, Argentina, Bangladesh, Brazil, Colombia, Ecuador, Egypt, Georgia, Ghana, India, Indonesia, Jordan, Kenya, Lebanon, Mexico, Morocco, Nigeria, Pakistan, Paraguay, Peru, Philippines, South Africa, Tanzania, Uganda, Vietnam

⁴ The Fairwork assessment framework differs slightly between location-based platform work, the topic of this study and cloud-based platform work.

⁵ Points are granted only where clear evidence demonstrates compliance, meaning a low score may reflect insufficient evidence rather than proven malpractice. Draft findings are shared with companies for comment before publication. Final ratings are peer reviewed across Fairwork research teams to ensure consistency, comparability and methodological rigour across countries and sectors.

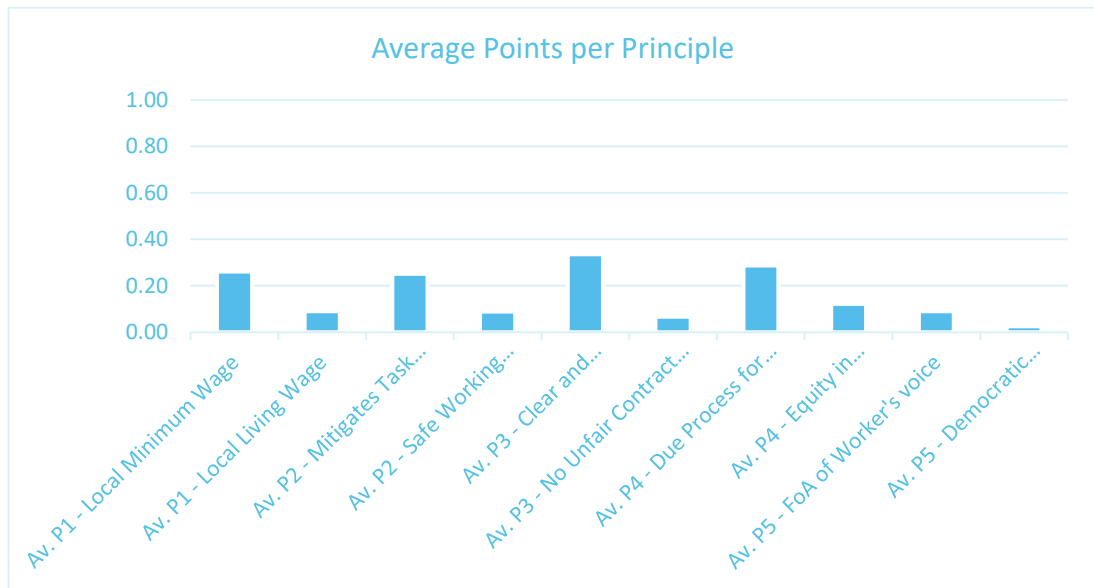
Principle	Sub-principle	Explanation
P2.1: Fair Conditions	Mitigates Task-Specific Risks	Platforms take steps to reduce work-related health and safety risks.
P2.2: Fair Conditions	Safe Working Conditions & Safety Net	Workers are protected against accidents, illness, and income shocks.
P3.1: Fair Contracts	Clear and Transparent Terms & Conditions	Contracts are clear, accessible, and understandable before joining the platform.
P3.2: Fair Contracts	No Unfair Contract Terms	Contracts avoid unfair terms that disadvantage workers.
P4.1: Fair Management	Due Process for Decisions Affecting Workers	Workers can challenge decisions affecting pay, work access, or account status.
P4.2: Fair Management	Equity in Management Process	Decisions are unbiased, consistent, and free from discrimination.
P5.1: Fair Representation	Freedom of Association & Workers' Voice	Workers can organise collectively and express concerns without retaliation.
P5.2: Fair Representation	Democratic Governance	Workers have meaningful influence over platform rules and policies.

3.1.1 Failure to provide basic social protection and other decent work gaps

The vast majority of digital labour platforms in LMICs score very low on Fairwork's 0–10 scale, with scores strongly clustering at the bottom. In fact, many platforms register total scores of 0, meeting none of the five Fairwork principles. Only a handful exceed 5 points, and no platform achieved a perfect 10; the highest observed was 9/10 (e.g. South Africa's getTOD in 2021). Common ceilings appear around 7–8 points for the best performers, while floors of 0 are extremely common across all regions and platform types.

Substantial differences exist between the five principles (Figure 3.1). Logically, platforms perform relatively better on most of the threshold conditions (the minimum standards), such as *making contracts clear and understandable* (P3.1) and on *allowing workers to challenge decisions affecting their work* (P4.1), although even these scores reach only about one third of the maximum. There is moderate performance in *ensuring workers earn at least the legal minimum wage* (P1.1) and in taking steps to *reduce task-related health and safety risks* (2.1). In contrast, outcomes are weakest for the advanced conditions, such as where workers should be able to *earn enough to cover basic living needs* (P1.2), be *protected against accidents, illness, and income loss* (P2.2), and be *shielded from unfair contract terms* (P3.2). The lowest scores concern workers' ability to *organise collectively and have a voice* (P5.1), and to *influence platform rules* (P5.2), which remain almost entirely absent. In short, the typical platform fails most principles, but especially P2 and P5 – any positive scores achieved tend to come from meeting basic pay standards (P1) or publishing transparent policies (P3/P4) for which evidence was easier to provide.

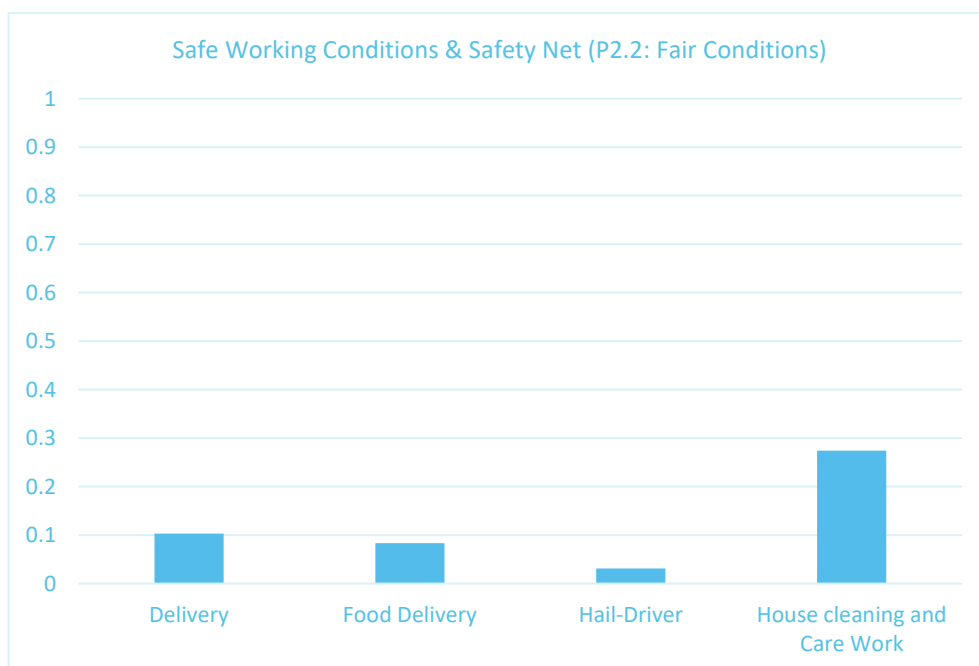
FIGURE 3.1 Average points per Fairwork principle



Source: Own calculations, based on Fairwork data (www.fair.work)

Looking more closely to the provision of *safe working conditions and safety nets* (principle 2.2), it becomes clear that the transport-related services, such as (food) delivery and hail-drivers, score very weak (Figure 3.2). Only a small minority provides basic social protection features, leaving workers exposed to critical risks. The situation appears to be slightly better for house cleaning and care work where Fairwork reports that almost one third of the platforms provide safe working conditions and/or basic social protection.

FIGURE 3.2 Scores on principle 2.2 for different platform types



Source: Own calculations, based on Fairwork data (www.fair.work)

Most platforms do not contribute to formal *social security or health insurance systems* for their workers.⁶⁷ Instead, many have adopted limited, piecemeal safety measures – chiefly accident insurance policies or medical emergency funds – as a substitute. For example, Indian and Vietnamese food delivery apps provide free accident insurance coverage for couriers in case of on-the-job injuries. Vietnam’s ride/delivery platforms Beamin and Be offers free health check-ups and health insurance for top performers as a perk.⁸ These measures, while positive, are ad hoc benefits rather than integration into a national social protection scheme. Voluntary or self-paid social insurance affiliation is another model: in Ecuador, platforms like Asoclim encourage workers to voluntarily affiliate with the National Social Security System (social security enrollment is offered but not financed by the platform).⁹

By contrast, a few standout platforms have committed to full social security contributions as formal employers. Colombia’s home cleaning service AseoYa explicitly offers its domestic workers permanent employment contracts with benefits like health insurance, pensions, and labour risk insurance (ARL).¹⁰ This essentially places their gig workers into the formal labour system, with the platform paying into social security on their behalf – a rarity in the gig economy. In general, domestic work platforms in Latin America show the strongest social protection: in addition to AseoYa, Ecuador’s Asoclim provides accident and occupational risk coverage and upgraded wages to meet minimum standards.

For the majority of ride-hailing and delivery platforms, however, social protection stops at accident insurance. It is now fairly common for large platforms to insure workers against on-trip accidents or injuries – often at no cost to the worker – as this was a minimum requirement for earning any Fairwork point on P2. For instance, BluSmart (India) and Baemin (Vietnam) give all drivers accident insurance free of charge. Some also distribute safety gear (helmets, reflective vests) or run road safety trainings. These steps mitigate task-specific risks and helped those companies score 1 out of 2 on P2. However, they stop short of true social security: typically no sick pay, no contributions to pension or state insurance, and coverage is limited to accidents on the job. Indeed, workers often criticise that such insurance is narrow or hard to claim – e.g. some couriers in Latin America found the accident insurance ‘overly bureaucratic’ and inaccessible in practice.

3.1.2 Lower scores over time

While the Fairwork dataset does not lean itself automatically for a longitudinal analysis across platforms and countries, our analysis confirms earlier studies by Fairwork¹¹¹² observing that the scores of a majority of platforms stagnate or get worse over time. While all the assessed platforms are informed by Fairwork about their scores, only a quarter of the selected platforms in 26 countries

⁶ Fairwork (2022). Fairwork annual report 2022: The year in review. <https://fair.work/en/fw/publications/the-year-in-review-fairwork-annual-report-2022/>

⁷ Fairwork (2024). Fairwork annual report 2023: State of the global platform economy. <https://fair.work/en/fw/publications/fairwork-annual-report-2023-state-of-the-global-platform-economy/>

⁸ Fairwork (2023). Fairwork Vietnam Ratings 2023: Labour standards in the platform economy. Oxford, United Kingdom; Berlin, Germany. <https://fair.work/en/fw/publications/fairwork-vietnam-ratings-2023-labour-standards-in-the-platform-economy/>

⁹ Fairwork (2023). Fairwork Ecuador ratings 2022/23: Platform hybrid models. Oxford, United Kingdom; Berlin, Germany. <https://fair.work/en/fw/publications/fairwork-ecuador-ratings-2022-23-platform-hybrid-models/>

¹⁰ Fairwork (2023). Fairwork Colombia ratings 2023. Oxford, United Kingdom; Berlin, Germany. https://fair.work/wp-content/uploads/sites/17/2023/11/Fairwork_Colombia_Report_2023_accessible.pdf

¹¹ Fairwork (2022). Fairwork annual report 2022: The year in review. <https://fair.work/en/fw/publications/the-year-in-review-fairwork-annual-report-2022/>

¹² Fairwork (2024). Fairwork annual report 2023: State of the global platform economy. <https://fair.work/en/fw/publications/fairwork-annual-report-2023-state-of-the-global-platform-economy/>

improved their scores over time. In their own analysis of this declining trend over time, Fairwork is pointing at the negative impact of different parallel drivers:

- economic pressure due to the growing competition between platforms, but also as a consequence of platform consolidation;
- investor pressure to reach profitability after years of growth;
- cost-cutting measures through algorithmic management, weak appeal mechanisms, etc.;
- legal and regulatory gaps and uncertainty leading platforms to ‘wait and see’;
- higher cost-of-living of workers and inflation pressures.

3.1.3 Regional differences

Sub-Saharan Africa (6 countries) shows the weakest Fairwork performance. Outside South Africa, most platforms score near zero across all principles, with ride-hailing and delivery apps in countries like Ghana, Kenya, and Nigeria routinely scoring 0/10. South Africa is a partial exception, where some platforms adopted proactive policies. Overall, the regional average is around 1/10, and Fair Conditions (P2) scores are almost universally zero.

Latin America and the Caribbean (8 countries) perform slightly better, averaging around 2/10. Some platforms - particularly domestic and cleaning services in countries like Colombia, Brazil, and Uruguay - reach middling scores by offering contracts or benefits. However, many major ride-hailing platforms still score 0 across countries. The region’s modest lead is driven mainly by domestic work platforms, not transport apps.

South and Southeast Asia (6 countries) display wide internal variation. India stands out with several higher-performing platforms that have gradually improved, while most platforms in Pakistan, Bangladesh, and Southeast Asia score 0 or 1. The regional average is about 2/10. Fair Conditions (P2) scores remain very low, with only a few platforms offering limited insurance or income guarantees; most provide no safety nets.

MENA and Eastern Europe/Central Asia (4 countries) largely mirror Sub-Saharan Africa’s low scores, averaging around 1/10. Platforms in Jordan, Morocco, Lebanon, and Georgia usually score 0 across all principles. A few exceptions - such as Egypt’s Breadfast and Albania’s Baboon - slightly raise averages. Fair Conditions are effectively absent, with most platforms offering no insurance or social protection.

3.2 Review of policy frameworks in 8 LMICs: a broad menu of options

For this study, legislation governing digital labour platforms in eight countries was examined (Annexes 2 and 3). This selection covers three regions: Latin America (Argentina, Chile, Mexico, and Uruguay), Asia (India, Malaysia, and Singapore), and Africa (Kenya). The country selection is aiming at i) reflecting a diversity of regional contexts amongst LMICs, and ii) highlighting experiences where regulations have already been approved and rolled out in LMICs. The legislation was assessed using the proposed framework, focusing on whether it explicitly included the rights of autonomous or part-time workers.

All frameworks are recent, published between 2022 and 2026, reflecting the growing interest in these tools on the public agenda. A key distinction concerns which activities these frameworks recognise and, therefore, under what type of legislation they are categorised. An important trend that emerges is their primary focus on location-based platforms, with countries like Argentina, Uruguay, and Kenya limiting their scope to mobility services for individuals or the delivery of goods. Meanwhile, the Mexican case covers services that require workers' physical presence, thereby excluding online work. While most of these frameworks fall under broader labour reforms or ad hoc acts, Kenya and India categorise them under the transport and social security codes, respectively, thereby affecting the scope of rights they cover, as shown in Table 3.1.

3.2.1 Recognition of work relationship

Regarding the recognition of a work relationship, with the exception of Argentina, Latin American countries have tended to make explicit the subordination and control of platforms over workers, with Mexican legislation using the term *patron* (master) to refer to platforms' role as employers (JUSTIA México, 2026). Among the Asian cases, Singapore is the only one that explicitly refers to the control platforms exercise through automated processes.

The recognition (or lack) of a labour relationship has implications for how workers are defined. In Argentina, the labour reform implemented by President Macri's right-wing government refers to workers as 'independent provider(s) of technology platforms'.¹³ Similarly, in Kenya, workers are labelled as 'persons authorised for services,' which releases platforms from any responsibility for the workers. Additionally, in countries like Malaysia and Singapore, a key trend is that their definitions of workers are limited to citizens and residents, excluding migrants who may be on the way to regularising their citizenship status.

3.2.2 Recognition of autonomous or part-time work

Another important distinction is the clear recognition of independent, part-time, or autonomous work. In the four Latin American cases, this status is fully recognised, with Chile, Mexico, and Uruguay distinguishing between dependent and autonomous workers and clarifying that the latter must still receive compensation proportional to the national minimum wage. In the Argentine case, failing to recognise a labour relationship excludes workers' rights to a minimum wage from the framework. In the remaining cases, independent work is not directly mentioned.

¹³ Law 27802. Art. 126, 8.

TABLE 3.1 Coverage of workers' rights across eight countries

Country	Argentina	Chile	Mexico	Uruguay	India	Malaysia	Singapore	Kenya
Explicit recognition of work relation	Red	Green	Green	Green	Grey	Red	Green	Red
Explicit recognition of autonomous or part-time work	Green	Green	Green	Green	Grey	Red	Red	Red
Explicit mention of a minimum wage	Red	Green	Green	Green	Grey	Green	Red	Red
Access to social protection	Green	Green	Green	Green	Green	Green	Green	Red
Anti-discrimination measures	Red	Green	Green	Green	Grey	Green	Green	Red
Algorithmic transparency	Green	Green	Green	Green	Grey	Green	Red	Green
Explicit recognition of freedom of association for autonomous workers	Red	Green	Green	Green	Grey	Red	Red	Red

Right or theme explicitly mentioned in the regulation.
 Right or theme excluded from regulation.
 Regulation does not apply to themes outside social protection.

3.2.3 Access to social protection

Failure to recognise a labour relationship does not necessarily mean that the legislation does not consider social protection coverage. In this area, all countries except Kenya provide workers, at least theoretically, with the possibility to access social protection; however, who bears the costs and how they are borne vary. As shown in Table 3.3, the systems may assign responsibility for making direct payments to workers, as in Argentina, Chile, and Uruguay. In the latter, workers contribute through the Monotax. The Monotax is a simplified tax system introduced in 2001 for self-employed workers and low-income retirees who provide services or products exclusively to end consumers to access retirement, maternity, and illness insurance (Aguiar et al., 2024). In 2011, a Social Monotax was created to assist household members below the national poverty line. In both cases, workers must register and pay a minimum monthly contribution of about 50 USD per person, which is 57% of the minimum monthly contribution for workers under other social security regimes (Ibid.). Since its creation, the Monotax has been seen as a contribution to reducing informal work in Uruguay, with the rate dropping from 42% in 2001 to 21.5% in 2022 (Ibid.). Although Argentina has both Monotax and Social Monotax regimes, the labour reform does not specify whether platform workers will contribute through these regimes (ARCA, n.d.). Instead, it is currently under debate if a new taxing sub-regime within the Monotax will be created to accommodate part-time workers as well as those who provide online services without an employment relationship (REALPOLITIK, 2026).

In the cases of Mexico and Malaysia, the frameworks place the responsibility on registering workers in national security systems and deducting their contributions from payments to the platforms. India, instead, states that the national government must cover these rights through the

Social Security Fund, while Singapore has created a mixed arrangement that combines workers' contributions with the creation of a special fund (CPF Transition Fund). Similarly, the Malaysian government has offered a mixed arrangement for the first two years to subsidise 70% of the contributions of first-year registrants in the self-employment scheme (including Gig Workers), and 50% of the contributions of those who renew for a second year (HR Asia, 2026). Thus, across all formalisation dimensions and in most cases, countries have managed to include social protection.

To what extent is social protection available for autonomous part-time workers? Only Chile, Mexico, and Uruguay specify that these rights also apply to these workers, detailing what the coverage entails in their respective cases. Mexico, for example, includes its right to access loan benefits from the Workers' National Housing Fund (Art. 291, K). In the cases of Malaysia and Singapore, coverage depends on the existence of a service agreement, which is not specified for part-time workers but may still apply. For Argentina and India, since their legislation uses broad definitions that cover all 'independent' or 'gig' workers, social protection applies to them.

3.2.4 Anti-discrimination measures and algorithmic transparency

Regarding anti-discrimination measures, with the exception of Argentina and Kenya, all frameworks prohibit discriminatory actions that could affect how workers receive or are excluded from assignment opportunities or payments. This aspect is closely connected to algorithm transparency. Situations of random 'deactivations' have been a major reason for workers to organise campaigns and protests against platforms worldwide (see [Part 2](#)), making it a central concern in most of these frameworks, except for Singapore. While these policies require informing workers about cases in which they may be disconnected, only in Chile does legislation permit the government to access proprietary data when necessary.¹⁴ Although these measures highlight the importance of transparency in reducing the risk of being excluded from platform opportunities, they do not necessarily address other forms of discrimination. Notably, only Mexico prohibits harassment, mistreatment, discrimination, and (sexual) threats, and mandates that platform companies implement a gender perspective in their workers' protection policies.¹⁵

TABLE 3.2 Who contributes to the worker's social protection?

Country	Worker	Platform discounts	Government	Mixed arrangement
Argentina				
Chile				
Mexico				
Uruguay				
India				
Malaysia				
Singapore				

Actor(s) responsible for making payments, according to national legislation.

¹⁴ Art. 152, D.

¹⁵ Chapter IX, Bis, Art. 291, R.

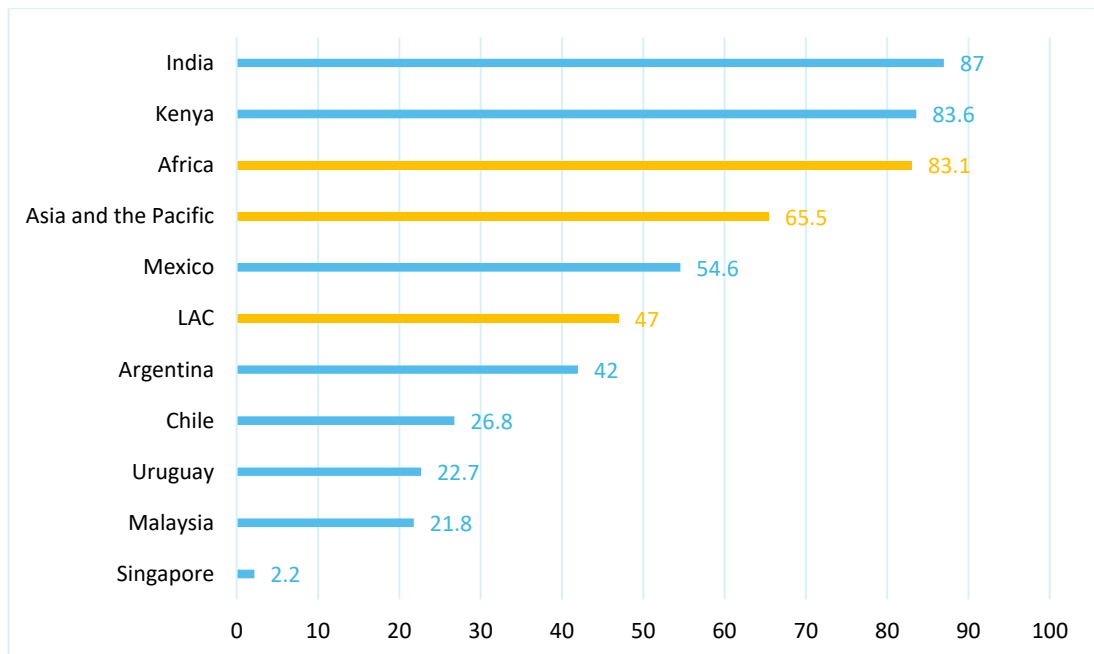
3.2.5 Freedom of association

Finally, regarding freedom of association, all frameworks recognise this right, with the exceptions of Argentina and Kenya. However, not all specify how it applies to independent workers. The exceptions are Chile, Mexico, and Uruguay. These three cases highlight how recognising the status of independent workers can provide additional security for workers in ‘alternative’ labour arrangements, seeking access to specific rights.

3.2.6 Informality and workers’ rights: a pressing challenge

How feasible is it to cover most aspects of labour formalisation in highly informal environments? Although this study examined only a few countries, there are clues that higher levels of informality make it more difficult. As seen in Figure 3.3, India and Kenya - cases where national laws do not address the proposed dimensions, either because decisions are left to individual states (India) or because they are not part of a broader labour reform (Kenya) - also have the highest informal employment rates among the selected countries, surpassing regional averages. Aside from Mexico, the other countries have lower levels of informal employment. The key issue is how to incorporate digital labour platforms as a new work arrangement in contexts where governments already face challenges in securing workers’ rights for informal workers. [Part 2](#) examines how discussions about the six dimensions of formalisation are evolving across four case studies, including the challenges they present.

FIGURE 3.3 Percentage of informal employment, compared to regional means



Own elaboration.

Source: (Federation of Kenya Employers, 2021; ILO, 2025a, 2025b; Ministry of Economy, 2023; Nath et al., 2023; OIT, 2025b)

PART 2

IN-DEPTH CASE STUDIES

4 BRAZIL

4.1 Platform landscape

With a population of over 213.5 million people, Brazil has rapidly become one of the platform's key markets (CEPAL, 2026). In 2014, during the World Cup in Rio de Janeiro, Uber started operations in the country. Today, Brazil is the company's second-largest market, operating in over 600 municipalities and 100 cities, with a network of 600,000 registered drivers (Cunha, 2025; de Oliveira et al., 2022). The expansion of Uber would be closely followed by new competitors trying to replicate its success. In 2024, 556 platforms were identified (da Silva neto, 2024), including international (Uber, 99 powered by the Chinese company Didi, and Cabify from Spain) and national enterprises (Globo and iFood), and cooperative businesses (Señoritas Courier, MTST Technology Centre, and Liga Coop) (Souza, 2026).

The recent mushrooming of platforms has had transforming effects on the labour market. According to the National Statistics Office (IBGE), 1.7 million people are working in digital labour platforms, equivalent to 1.9% of the population employed by the private sector (Gomes & Peters, 2025). Even when the national unemployment rate is at its lowest since 2012 (6.2%), platform work has increased by 25% over the last two years, with 58.3% of workers having transport or hail-driver platform work as their primary source of income (Ibid.).

Behind Brazil's platform boom lies a duopoly, with two companies controlling the market. First, Uber, representing 50% of the market share in rail-hailing services (Picasso, 2025). Second, iFood has an 86% market share in the delivery platform market, with order volumes 16 times higher than those of its nearest competitor (Uber Eats) (Fioravanti, 2020). Although Didi's recent purchase of the national company 99 aims to gain some of the Brazilian delivery market share through 99Food, Uber and iFood's dominance has allowed the companies to carry out what has been described as a 'cowboy-style' expansion, setting labour practices in an ecosystem shaped by them (Picasso, 2025). As noted by a national researcher (26/02/2026):

(Platforms) go down after they conquer a part of the market. They win the trust of the workers and they trap them inside the platform. So, after, they cut the bonuses, they cut wages, they cut everything. They have the customers, and they have the workers. They got the market, and here in Brazil, the market is monopolised.

Uber and iFood's concentrated market power has led to a situation in which increasing worker-organisation resistance is met with robust company lobbying. This dynamic has led to back-and-forth policy debates and legal battles that have delayed the establishment of a legal framework for digital labour platforms (see Section 4.3).

Platform workers in Brazil are overwhelmingly male (83.9%), young adults in the 25-39 age bracket (47.3%) (Gomes & Peters, 2025). In terms of racial identity, 59% of workers identify as Black or Pardo, with this tendency increasing among female workers (Magalhães dos Santos, 2023; Souza, 2026), reflecting how platform work disproportionately draws in historically marginalised groups (Magalhães dos Santos, 2023). Most hold a high school diploma or some incomplete higher education level (59.3%), while workers with incomplete elementary education are the smallest

group (9.3%), even smaller when compared with non-platform workers (21.7%) (Gomes & Peters, 2025). This suggests that platform workers attract people with a basic level of schooling who nonetheless lack access to professional opportunities. Among science and intellectual professionals (5%), this group expanded the most among workers since 2022, as other types of service platforms for professional freelancers emerged (Ibid.).

Informality is high (71%)¹⁶ in the platform sector compared to non-platform-based work (43.8%) and the country's mean (35.8%). Moreover, only 35,9% contribute to social security (Gomes & Peters, 2025; OIT, 2025b). In absolute terms, these workers' earnings are higher (4.2%) than the average of non-platform workers. However, their hourly income is lower (8.3%), having to work 5.5 hours more a week (Ibid.).

The gap between the consolidation of platform companies' market power and the decline in workers' earnings is a significant indicator that the expansion of platform work is not translating into better working conditions, especially since workers are dedicating full-time to this form of economic activity.

What initially emerged as an opportunity for additional work to supplement family income ended up becoming the primary source of income, or the sole source of income for a large majority of workers. (...) We have a decrease in the overall income (...) of these workers: loss of purchasing power, loss of economic capacity, working hours that are much more exhausting. So, a degeneration, a worsening of the living conditions, of the working conditions of these men and women (Trade union representative, 20/03/2026).

In the Brazilian case, the dissonance in working conditions amid an expanding sector has been at the core of the interviews conducted for this study, as experts and civil society representatives claim that what seems to be an issue exclusively pertaining to drivers and delivery services could eventually affect the rest of Brazilian workers.

4.2 Main issues affecting working conditions

In the Brazilian case, the current platform landscape poses five challenges to workers in the sector:

No formal recognition of a work relation nor legal framework

Workers operate under what has been described as a 'legislative limbo' where they are classified as 'partners', 'providers', or 'entrepreneurs', rather than employees (Trade union representative, 20/03/2026), leaving them out of the formal labour protection system. Therefore, all operational risks (e.g., accidents, equipment wear, income volatility) fall solely on them with no pension contributions or guaranteed minimum income. This situation, coupled with growing claims against platforms' algorithmic control and opaque rating systems, the lowering of income, and the increase of debt schemes related to platform use, has led some sources to identify the worsening of labour conditions in the sector (Fairwork, 2025c) (Researcher, 26/02/2026).

¹⁶ Calculations are done by the Brazilian Institute of Geography and Statistics (IBGE), based on the Continuous National Household Sample Survey (PNAD).

'Pejotização' and the impact of liberal reforms in the labour sector

Following the impeachment of former President Dilma Rousseff, Michel Temer was elected for an interim term. It was during this term, in 2017, that Temer approved a liberal labour reform (Law No. 13.467/2017). Considered one of the most significant reforms in Brazil's labour history (Grohmann et al., 2022), the reform introduced new forms of contracts, including that of outsourcing. Known as 'pejotização', this allows companies to hire individuals as independent contractors (by creating their own legal entity) to provide middle or core services, with lower tax incentives for both companies and contractors. Thought as a form to promote startups and entrepreneurship, this measure has been criticised for suppressing companies' obligations towards payments of legal rights and creating cases of 'illicit' outsourcing that have been taken to the Superior Labour Court (TST) (Baião & Santos, 2023). The reform also included the creation of the on-demand worker who does not fit a full-time hiree model. As explained by an expert:

They introduced a new kind of worker that it's the intermittent, it's like a zero-hour contract worker where you have the contract, you are an employee, but you don't have a guaranteed 40 hours a week. You're hired for 8 hours, you receive a wage for 8 hours. It's the zero-hour contract, just like in the United Kingdom (Researcher, 26/02/2026).

The reform significantly affected platform work by allowing companies to refuse to establish an employment relationship. It was soon followed by another legal measure eliminating a tax on salaried workers - equivalent to a day's work - that funded unions, thereby reducing their resources (Ibid.). The legal loopholes introduced by this reform are now under court review, raising concerns about the level of protection for emerging work models such as digital labour platforms.

The landmark of the loss or erosion of labour rights is 2017. And we've been in a trend of tensions and disputes about what will survive of the labour law. Now we have a new moment in the Supreme Court's discussions regarding employment relationships and the use of independent contractors (Ibid.).

Difficulties in collective organisation

The lack of recognition of an employment relationship affects union representation directly, as their legitimacy to negotiate on behalf of platform workers is contested. As a result, no collective bargaining agreement has been reached with any major platform. The 2017 labour reform further weakened unions by eliminating mandatory taxes, stripping the movement of vital funding. Although union networks are supporting platform workers (e.g., Central Única dos Trabalhadores) and several platform workers' associations have emerged (Researcher, 20/03/2026; Researcher, 26/02/2026; Trade union representative, 20/03/2026), the lack of recognised collective representation limits their capacity for negotiation. A representative of a trade union umbrella reflects:

The Brazilian union system, as it was originally structured, restricts classic union representation to workers with an employment contract. Therefore, other employment relationships may fall outside the scope of classic union representation. The first argument is that these workers are not platform employees and therefore do not have an employment contract that would allow them to be included in the classic union structure that Brazil has ... The second point, which stems from the first, is that the Brazilian union system requires the existence of an economic category and a professional category for

unions to be constituted. There are unions for the economic category (company unions) and unions for the professional category (workers' unions). If you understand that these workers are not workers, then there is no professional category to organise and be represented (Trade union representative, 20/03/2026).

Debt and financial dependence

One of the most significant trends in Fairwork's latest report on the state of platform work in Brazil is the growing offer of financial products by platform companies to workers (Fairwork, 2025c)(Fairwork, 2025c). Both Uber (through [Uber Conta](#), created by the Spanish fintech Digio) and iFood (through [iFood Pago](#)) have their own banking arms, offering car loans, credit cards, and insurance to their 'partners' (restaurant businesses, drivers, and delivery workers) that are deducted directly from in-app balances. This tendency has rapidly been followed by other companies like [InDrive](#) and Didi, whose loan programme has been covered by some media as a way for the company to venture into the Brazilian market and the 'labour community that supports it' (Palacios, 2025)(Palacios, 2025). Fairwork's report describes the progressive merging of platform work with debt schemes as a means to induce workers towards 'a position of servitude' (Fairwork, 2025c, p. 24)(Fairwork, 2025c, p. 24), as platforms now can directly charge them for cancelled orders, accidents, and weekly app usage fees, even if they choose to switch platforms, taking their debts with them (Ibid.). The increasing indebtedness of workers was described by one of the study's participants as a form of 'modern slavery':

When the platform advances to the point of controlling the entire ecosystem (...) The worker buys the car with the money the platform provides. We're talking about a modern slavery structure, where the worker is simply swallowed up and works to maximise the platform's profit, only consolidating a relationship of absolute dependence. So, we see with great concern that platforms have been advancing under the guise of supporting workers (Trade union representative, 20/03/2026).

Although the practice of debt bondage is addressed in the Supplementary Convention on the Abolition of Slavery, the Slave Trade and Institutions and Practices Similar to Slavery (1956), and is recognised as a central source of modern slavery by the United Nations (Informe de La Relatora Especial Sobre Las Formas Contemporáneas de La Esclavitud, Incluidas Sus Causas y Consecuencias, 2016)(Informe de La Relatora Especial Sobre Las Formas Contemporáneas de La Esclavitud, Incluidas Sus Causas y Consecuencias, 2016), the link between fintechs, digital financial instruments and platforms, and digital labour platforms was not part of the ILO's reports on decent work in platform economy in the contexts of the 113th Session of the International Labour Conference.

Gender and racial vulnerabilities

Women, and particularly black women, face additional layers of precarity: sexual harassment by customers and peers, lack of access to bathrooms and rest facilities, absence of maternity leave, lack of support for incident reporting, among others, further discussed in Section 4.5 (Magalhães dos Santos, 2023). These claims are incipient in the current discussion for a legal framework for women workers. This is problematic not only for the specific rights for social protection that may be dismissed, but it can also lead to assumptions that certain policies may favour men and women equally.

It's still something very incipient, something still very small compared to what is needed (...). Basically, when we talk about the right to union organisation and representation, this doesn't differentiate between genders, so it's an action that benefits everyone, without distinction. When we talk about remuneration policy, minimum wage, and algorithm transparency, these also doesn't make much difference by gender; it benefits men and women equally. What is different and specific is when we talk, for example, about social protection policies, whether they are retirement or basic social protection policies, the possibility of discussing different rules for men and women (Trade union representative, 20/03/2026).

4.3 Policy debates

When President Luiz Inácio Lula da Silva was elected for a new term in 2022, one of his campaign promises was to establish decent work conditions for workers, acknowledging the urgency of rights for workers on digital labour platforms (Grohmann et al., 2022). However, as time runs close to the end of the term (January 2027), no law has been established. This legal gap has left courts making decisions based on their interpretation of existing law, resulting in contradictory outcomes across levels.

The TST, Brazil's highest labour tribunal, has leaned toward not recognising an employment relationship in cases involving Uber, citing the flexible and non-exclusive nature of the work as justification (Azuara et al., 2025). This case set a precedent, influencing similar court rulings for over 16,000 cases (Ibid.). Moreover, platforms have strategically avoided precedent-setting rulings by settling cases when they land before pro-worker judges, preventing the formation of binding jurisprudence (Researcher 03/03/2026). This strategy comes hand-in-hand with lobbying and corruption practices in different power instances (Fairwork, 2025c).

The lobby of the platforms is so strong, so strong. And they won't let anything pass (...)
So, I think (some law) will pass. And I'm sure that it won't be enough. It won't be enough to guarantee a decent, a fair work (Researcher, 26/02/2026).

Separately, in 2025, a Supreme Court justice suspended all nationwide proceedings related to 'pejotização, pending a full ruling that was expected by the end of the year. If this practice is legitimised across the board, it could have overarching effects, extending false self-employment well beyond platforms (Schon, 2025)(Schon, 2025).

Dozens of law projects have been debated in Brazil's National Congress over the years, with no final legislation enacted. The most significant attempt came through PLP 12/2024 which emerged from a tripartite working group between unions, platforms, and government representatives (Fairwork, 2025c). The group's mandate was to produce a regulatory framework, but it ended without a final report, and the bill would only focus on ride-hailing. As a result, workers' representatives criticised the process for treating all platform workers as a homogeneous sector. Moreover, it had several issues regarding workers' rights: it allowed up to 12-hour work shifts without mandated breaks, it did not include algorithmic transparency or data protection, and it recognised subordination mechanisms such as sanctions and real-time monitoring, while explicitly excluding an employment relationship. The following bills presented, such as PLP 152/2025, had workers' support but removed other issues, such as references to minimum wages (Ibid.).

One of the most contentious issues in the current debate concerns the **tension between recognising an employment relationship and workers' demand for self-employment**. As in other contexts, for platform workers in Brazil value autonomy, independence, and flexibility in digital platforms (Anwar & Graham, 2021; Azuara et al., 2025; Instituto Peruano de Economía, 2023). As such, one of the main issues in the discussion of PLP12/2024 was the level of autonomy workers demand from platforms,

This bill was awful, but there were basic rights like minimum wage and the right to collective bargaining. It was kind of interesting, but it guaranteed platforms total control over the workers (...) The next day in the parliament, groups of workers, of drivers, went to the parliament and said: 'No, I don't want this bill because what I really want is to be a real self-employed, I want more autonomy. I don't want any kind of control from the platforms'. It was very interesting because it was the opposite. They didn't match because (the bill) was proposing 'platforms, you can control (workers) and you won't be the employer, but you will guarantee minimum rights'. And workers said: 'No, I don't want these rights. What I want is truly autonomy' (Researcher, 26/02/2026).

The dispute between associations seeking recognition as employees and workers seeking to maintain their autonomy reveals the need for the law to accommodate different work arrangements (Researcher, 26/02/2026; 03/03/2026). The challenge stems from determining the appropriate instrument and the extent of autonomy granted, given that Brazilian labour law already includes instruments for more flexible work arrangements.

We have in our constitution the 'trabalhador avulso'.¹⁷ It's literally an on-demand worker, and they are entitled to all and every labour right in Brazil. And in the labour law reform of 2017, they introduced the intermittent worker (Researcher, 26/02/2026).

If the legal instruments already exist, then should it be assumed that the Brazilian debate could be solved by finding the correct way to apply them? The discussions with the study's participants suggest that the issue lies in the clarity of a relationship of control towards some employees and the need to guarantee some form of protection, without covering some false form of independence:

Most platforms try to classify workers under (MEI, or micro-entrepreneur). But they have differences because, for example, iFood subcontracts other companies, which are actually individuals or micro businesses that hire other people. In theory, these logistics operators should be registered as an MEI. And I think most are. The issue is that the MEI regulates this form of work, but it doesn't cover, for example, social security (...) The problem is that this was used to hire people as fake self-employed individuals. So, each one is like their own company and is hired to provide services (Researcher 03/03/2026).

In the case of Bill 12/2024, Fairwork (2025) found that the bill, modelled on the 2020 California regulation, introduced the figure of the autonomous worker based on elements such as the absence of exclusive work with a platform and of mandatory working hours. However, it promoted other forms of subordination and asymmetry, such as the lack of clarity regarding remuneration,

¹⁷ The 'trabalhador avulso' is a self-employed worker that provides services to various companies without an employment relationship. The service is temporary and the intermediation between the worker and the company necessarily involves a union of the Labour Management Organisation (OGMO). However, the workers can choose to join the union or not. These workers have the same rights as those with formal employment contracts and must contribute to social security. <https://www.jusbrasil.com.br/artigos/o-que-e-trabalhador-avulso/1263097394>

which in Brazil has been at the centre of workers' demands (Section 4.7). Meanwhile, unions are pushing for recognition of rights and workers' control over their work, outside the classic employer-employee relationship.

Even though we're discussing basic social protection, the right to retirement, and minimum wage, this doesn't mean these workers will be integrated into a classic employment relationship. Many don't want to; they don't see themselves that way. But what unions and workers advocate for is that, regardless of whether they are seen as workers, entrepreneurs, or self-employed individuals, they should have dignity, the right to retire at some point, some level of protection in the event of an accident or other event that prevents them from continuing to work and generate income, and a minimum of predictability and guarantees - in fact, a fair remuneration policy that doesn't force workers in this sector to work 12, 13, or 14 hours a day without time or even the means to have a basic meal (Trade union representative, 20/03/2026).

Despite the pressing need for legal clarity and the sector's increased visibility in public discussions, the debate primarily focuses on two types of services: hail drivers and delivery workers. This is notable because platform work has been expanding into other sectors within the country, which face similar issues such as opaque payment practices and uncovered costs (Fairwork, 2025c). However, these additional services are not included in the current debate.

Today, you have the platformisation of a series of areas and services. Domestic work is one of them, but we have here, for example, platforms that mediate the hiring of freelancers, lawyers, architects, and construction service providers. In short, we have seen the expansion of this concept of platformisation to practically every segment (...) Unfortunately, and this is a debate that we within (TRADE UNION ORGANISATION) itself try to have, is to alert more classic, traditional and consolidated sectors that the platformisation of the economy is something real (...) But today the debate ends up being conducted primarily by workers in the two-wheeled and four-wheeled sectors (Trade union representative, 20/03/2026).

4.4 Rights coverage and social protection

Currently, some platforms have voluntarily extended limited protections to workers. The most significant initiative across the two major platforms, Uber and iFood, has been the introduction of accident insurance policies that cover workers (and passengers) while they are logged into the platform and actively completing a delivery or ride. These policies are funded by the platforms and represent one of the concrete gains that emerged from dialogue between union organisations and companies (CSO representative, 20/03/2026). Other initiatives include coverage for equipment damage and the creation of rest points in cities (Researcher 03/03/2026). However, in practice, these offerings are insufficient and unreliable, with workers reporting that they cannot access accident insurance when they need it (Researcher 03/03/2026) (Fairwork, 2025c). For women workers, iFood offers a one-off payment of R\$500¹⁸ for pregnant delivery workers, an amount a participant described as too low to cover basic infant supplies (Researcher, 20/03/2026).

¹⁸ Equivalent to 85.00 euros.

Social rights coverage is also deficient. Two-thirds of platform workers in Brazil do not contribute to any pension system, which is among the highest non-contribution rates in Latin America (Azuara et al., 2025). Health insurance is also low, with only 31% of workers reporting having health coverage despite Brazil's universal non-contributory public health system (Ibid.).

Issues of access and the coverage of minimum social protection rights are part of the current negotiations. However, the issue is not whether these rights should be included, but who will fund them. Initially, cost-sharing between platforms and workers was discussed, but this was dismissed due to workers' low incomes (Trade union representative, 20/03/2026). On the other hand, platforms do not want to pay the full amount as other types of companies (Researcher, 26/02/2026). In this dispute, workers' unions are pushing for an ad hoc solution, similar to those in other informal sectors.

We are discussing specific rules and processes that could be tailored to these workers, and not the classic rules we have today in Brazil. It's similar to how, when domestic work was regulated in Brazil several years ago, a specific rule was also created for social security contributions. Following this experience of regulating domestic work, the idea is to build a specific set of rules that allows companies to pay for access to the social protection system for these workers. This is still being discussed, the how, the how much, and it's still a subject of debate here in these working groups (Trade union representative, 20/03/2026).

4.5 Anti-discrimination measures

In the 2022 national census, for the first time, the percentage of people who identify as black or mixed (*mestizo/a*) (56,5%) in Brazil surpassed that of those who identify as white (42,5%) (swissinfo.ch, 2024). Despite their large representation, the black and mixed population is affected by racial inequalities, with a study showing that 84 of 100 black people in Brazil have suffered some form of racial discrimination (De Freitas Moura, 2025).

Platform work in Brazil is marked by intersecting inequalities of gender and race (Researcher, 20/03/2026), yet anti-discrimination protections towards women and vulnerable populations remain absent or marginal in both voluntary policies and the regulatory frameworks currently under debate. Women in Brazil have been documented as attracted to platform work for the flexibility and sense of freedom it provides, allowing women and sexual minorities to balance multiple activities and access different areas of the city. However, this type of work in public spaces exposes them to a different set of vulnerabilities far beyond the precarity experienced by their male counterparts: verbal aggression in traffic, sexual harassment by customers and restaurant staff, lack of public restrooms and hygienic facilities, lack of maternity leave, among others (Researcher, 20/03/2026).

Women have never been welcome in public spaces. A woman who dares to work, who dares to ride a motorcycle, needs to be protected and welcomed, because the city is hers too. The city is a kind of factory floor in this profession (Researcher, 20/03/2026).

(Women) don't have the right to get pregnant, to have children. Because if they do, they're out (of platform work), and it's a very delicate issue, because, at the same time, they claim

the platforms as workspaces precisely because they provide the flexibility for care work (Researcher 03/03/2026).

Women often report experiencing threats, attempted harassment, or other more serious situations, and the platform does nothing. The platform doesn't remove them. However, if a customer complains about a delivery person's service, the platform immediately blocks that person (Researcher, 20/03/2026).

The lack of adequate physical infrastructure and protection systems exposes women to different health risks that are widely neglected in the literature on platform work.

Many have reported having urinary tract infections because they need to drink less water, either because they are not allowed to use the restrooms or because they cannot use them at all. Here in Brazil, we don't have public restrooms that are accessible not only to these workers but to the population as a whole. The city is very much designed for men (Researcher, 20/03/2026).

I met at least three women who were working while pregnant, running the risk of being in a motorcycle accident. And one of them even reported that she suffered a miscarriage. She was working very hard, working close to 14 hours a day, with two children, right? And she went through that. She didn't know she was pregnant (Ibid.).

Women and sexual minorities also struggle to find representation in traditional spaces. As documented in different sources, one of the platform workers' main tools for organisation and coordination is social media, including WhatsApp groups (Bonini & Treré, 2024; Fairwork, 2023c; Putri et al., 2023)(Bonini & Treré, 2024; Fairwork, 2023c; Putri et al., 2023)(Bonini & Treré, 2024; Fairwork, 2023c; Putri et al., 2023)(Bonini & Treré, 2024; Fairwork, 2023c; Putri et al., 2023). However, these virtual spaces are also male-dominated, with women exposed to mocking and the circulation of pornography that inhibits their participation (Researcher 03/03/2026). The lack of representation of women in spaces of public discussion had repercussions on the PLP 12/2024 bill project, as no gender issues were mentioned (Magalhães dos Santos, 2023)(Magalhães dos Santos, 2023)(Magalhães dos Santos, 2023). Today, some women-led organisations are demanding their participation in the legal debate.

There's the first association of women delivery workers, AMEN, in Paraíba, and they face a major challenge in gaining a foothold within the movement. The workers approach the women and ask, 'What do you need?'. The women reply, 'We need support systems, we need maternity leave, we need paid time off, vacations, this, that.' And the men take this all the way to the parliamentarians, often as if it were something they created. So the women are excluded from this decision-making process. The women have no voice. (...) Since President Lula took office, he's set up some working groups (...), first they form a discussion panel with the delivery workers, with the companies, with people from unions, but never with the women (...) even though the situation they experience is much more critical (Researcher, 20/03/2026).

(Women) issues weren't being addressed because 90% of those working in that category are men. (Women) started organising themselves, they started creating associations. So, there's an association in Brasília, an association in Espírito Santo, and an association in

Pernambuco. And now, as a result of the hearings taking place in Congress, they've started demanding space at the negotiating tables (Researcher 03/03/2026).

Despite progress on gender issues in hail-driving and delivery, the current debate, confined to these two services, amplifies vulnerability in other services that are growing within the digital labour offer: domestic work. In Brazil, domestic work, which is almost entirely female and has strong colonial ties to servitude, occupies an even more precarious position, as the current Brazilian framework already excludes workers who serve multiple households from standard labour protections.

Domestic workers who are in-demand (apps) already don't have any rights here in Brazil. They are segregated. If you are a domestic worker who works at least three times a week for the same family, you have all the rights, but if you work twice a week for the same family, you don't have any rights (Researcher, 26/02/2026).

In Brazil, we have Parafuso (...). These women have a very linked organisation, or a contact linked to traditional, old unions of domestic employers, but they have a lot of difficulty organising themselves, because it's a job that's very fragmented (Researcher 03/03/2026).

As digital platforms continue to offer new services, the urgency of including anti-discrimination measures in Brazil's debate on a regulatory framework for these platforms has never been greater.

4.6 Algorithmic transparency

Three transparency deficits are currently at the centre of discussion regarding algorithmic transparency in Brazil: the logic of punishments and deactivations, pay calculations, and the changing terms of contract (Researcher 03/03/2026).

Deactivations represent a form of firing, in which workers cannot continue providing services through the platforms. In Brazil, 30% of workers have reported receiving threats of punishment and/or deactivation (Gomes & Peters, 2025)(Gomes & Peters, 2025)(Gomes & Peters, 2025)(Gomes & Peters, 2025), exercising control over their capacity to work. The opacity is equally high regarding the composition of charging fees and effective earnings. Moreover, workers find inconsistencies in their earnings. Within the gamification logic of platforms, they cannot reconcile how colleagues with lower rankings sometimes receive higher pay (Researcher, 03/03/2026). Clarity in the rules behind incentives is a high priority, as over 55% of app drivers and 50% of delivery workers admit that their working hours are influenced by the price premiums that platforms offer (Gomes & Peters, 2025)(Gomes & Peters, 2025)(Gomes & Peters, 2025)(Gomes & Peters, 2025).

You don't have a clue how much (platforms) charge the worker. The worker doesn't know how much the customer was charged. They don't know the percentage that they have charged the worker. So they want more transparency in the prices charged for the consumer (Researcher, 26/02/2026).

In response to the lack of transparency and companies' control over information about earning potential, some cooperative-owned platforms have emerged (Souza, 2026)(Souza, 2026)(Souza,

2026)(Souza, 2026). While these models could offer greater transparency and better safeguard workers' interests, they remain limited compared to dominant market-controlled companies. Therefore, it is crucial to develop structural solutions to address the opacity of algorithms and earnings conditions.

It's very difficult for (cooperatives) to survive, to compete with iFood or Uber. Even if they invent a good app, from a technological point of view, they survive through solidarity. There are experiences like that in Brazil, where someone invented a driver app, and Uber went there and lowered the price to bankrupt them. So they can't survive. It's a matter of competition (Researcher 03/03/2026).

4.7 Worker representation

Platform workers in Brazil have built a diverse organisational landscape that functions within legal, financial, and structural constraints, affecting their ability to negotiate and turn agreements into binding commitments. Two broad types of organisations currently dominate the scene: traditional unions affiliated with the major union centrals (centrais sindicais) and newer associations and collectives specifically represented by and for platform workers.

There are seven union centrals, among which the Central Única dos Trabalhadores (CUT) and União Geral dos Trabalhadores (GUT) are the largest, hosting national leaders of the platform worker movement of both two-wheel and four-wheel workers (/Researcher 03/03/2026; 25/02/2026). At a local level, cities have delivery worker associations and in the case of Brasília, there is a legacy motorcycle union (sindicato de motefretistas) that has joined app-based workers despite initial resistance (Researcher 03/03/2026). Finally, at the national level, the most relevant organisation is the National Association of App Delivery Workers (ANEA), which has emerged as an umbrella body to unify the diverse movement's demands (Fairwork, 2025c)(Fairwork, 2025c)(Fairwork, 2025c).

The central problem for workers' associations is that, in the absence of employment status, they technically fall outside the categories the labour law uses to define a union. For a union to be officially recognised in Brazil, it must obtain a *carta sindical*, a formal registration granted by the Ministry of Labour that certifies it as a legitimate representative of a defined professional category (CSO representative, 20/03/2026). Workers' associations representing platform workers have not yet received this recognition, meaning that although they exist in practice, they lack the legal standing to negotiate, which drives platforms to distance themselves from these associations, citing legal uncertainty.

(T)hese unions exist in practice, they have bylaws, they hold elections, they have grassroots work and representational work, they have their own life and activities. But they are not yet recognised by the Ministry of Labour as official union entities representing these workers. And this makes bipartite dialogue and collective bargaining impossible, because companies don't see legal security to build negotiation instruments with these entities (Trade union representative, 20/03/2026).

The lack of legal recognition and reduced finances due to the 2017 labour reform, which eliminated a key revenue source (see Section 4.2), have led workers to explore alternative strategies to voice

their demands. One prominent tactic has been the '*breque*' (braking), where workers collectively log off from platforms, halting deliveries and rides across cities. The first major *breque* occurred in 2020 during the pandemic, involving a 48-hour protest that mobilised 2000 workers in 60 cities, demanding an increase in the minimum per-delivery rate (from R\$6.50 to R\$10.00, roughly US\$ 1.14 and US\$ 1.75) (Business and Human Rights Centre, 2025). The latest *breque* took place in April 2026, protesting against the Proposed Complementary Bill PLP 152 currently under discussion in the Chamber of Deputies, which introduced a new requirement to provide proof of no criminal convictions, potentially excluding formerly incarcerated workers from platforms. Workers also called for adjusting minimum fares in line with inflation, ensuring full rates for multiple orders, and transparency in dynamic pricing criteria (Ibid.).

Workers' associations coordinate via WhatsApp, Telegram, and other social networks and have become more active in legislative efforts by attending congressional hearings and lobbying progressive parliamentarians. The union umbrellas also now provide direct services for workers, such as offering legal aid to challenge platform decisions, helping secure cheaper credit for equipment, and providing basic medical services, filling the gaps left by both the government and the platforms. A representative of a trade union umbrella shares,

Unions have been seeking ways to guarantee access to insurance coverage, access to cheaper lines of credit or financing for the maintenance of their work tools, provision of basic medical services, and support for workers in the legal sphere when they need to challenge the platform. In short, a whole structure of protection, not funded by the State, not funded by the platforms, but built by the unions themselves, through solidarity and contributions from workers, which significantly limits the capacity, the possibility of scaling and the scope, but the unions have been trying to be present in the daily lives of these workers, even as part of the strategy of organising and building value for these men and women (CSO representative, 20/03/2026).

However, it is worth noting that platform workers are not homogeneous, and associations disagree on some fundamental questions, including the recognition of full autonomy, which complicates the negotiation of unified positions (Researcher, 25/02/2026, Researcher, 03/03/2026). Meanwhile, a significant threat looms from the Supreme Court: a ruling that would allow workers to waive labour protections via civil agreements. Such a decision could undermine the foundation of future employment rights, a concern a participant specialised in labour law considered critical.

You can't just say 'I don't want the labour law, I want to be self-employed'. No, it's the reality that says if you are an employee or not. And the Supreme Court in Brazil wants to change it. If a worker signs a contract with his or her employer saying, 'this is a commercial contract, this is a civil contract, I don't want labour rights', it's going to be a lawful contract (Researcher, 25/02/2026).

Although there is broad consensus in the literature, among participants, and in the political moment about the urgency of a legal framework for platform workers in Brazil, the path to achieving it remains contested. A first step is the formal recognition of platform workers' organisations in the same conditions as unions, as in the current state, platforms can refuse to negotiate with them, and courts can dismiss collective claims (CSO representative, 20/03/2026). A second step pertains to agreeing on minimum regulatory guarantees: a remuneration floor, access to social security, and basic social protections. As shown in this case study, the Brazilian law already contains legal

instruments that could, in principle, accommodate flexible work while preserving fundamental rights. The obstacle, as one labour researcher puts it, is not legal imagination but political will (Researcher, 26/02/2026). Moreover, these minimum guarantees should recognise the full diversity of the workforce, especially gender, racial, and ethnic differences that expose workers to different risks.

In the current state of the debate, Brazilian workers' organisations could benefit from international exchanges and networking with other movements. Participants point out that these organisations mainly follow European and US debates, which do not accurately represent the regional and national challenges experienced by workers in Brazil.

(C)reating bridges. Creating events where (workers) can meet, but also information, what is achieved in a country, what the difficulties are, the different legislations (...) I don't recall any articulation between Brazilians (workers) with other movements in Latin America (Researcher 03/03/2026).

(To) foster some level of exchange between Brazilian organisations and organisations in other countries, so that we can understand, especially in countries where it has already been possible to evolve with some type of legislation, what the role of unions was. How did the union manage to have an impact? How did this change, or not, the reality of work for men and women? How did unions manage to make this part of their union innovation strategy? (Researcher, 26/02/2026).

Finally, in a context in which two companies control most of the market and are looking for ways to exercise direct influence over court decisions, there is an urgency for legal assistance to workers and to balance information inequalities, especially amongst those with reduced representation in workers' organisations.

Adequate technical advice is essential, and that costs money. Companies have the financial means to hire the best consultants in the world, while unions often lack that capacity. The struggle becomes somewhat unbalanced in terms of preparation capacity and technical argumentation. The unions do what they can, but it's a balance that isn't even, that isn't fair. It's an army of lawyers, economists, specialists from all sectors versus a handful of technicians and union leaders who have to stop a gigantic bulldozer that wants to run them over (Researcher, 26/02/2026).

Legal assistance is needed to empower these women, because many of them are entering the struggle not by accident, but for survival. They arrive without legal preparation; for example, they don't know what to do when they have accidents. I remember speaking with an interviewee who said, 'I thought it was just us going through this, but you said it's a global movement; there are many people in this situation.' So, these women are still very isolated (Researcher, 20/03/2026).

5 PERU

5.1 Platform landscape

Peru's platform economy is highly diverse. Recently, it has grown beyond urban mobility (hail-riding) and food delivery to include logistics, digital work, and care work (Cuore, 2024; Fairwork, 2025a). In traditional services like hail-riding, the market is segmented by economic sector (Cuore, 2024), with major players such as Uber competing against at least six others: Easy Taxi, Didi, InDrive, Yango, Satelital, and Cabify. The influx of competitors has made the Peruvian market highly competitive and volatile for platform companies, with firms such as Glovo (Brazil) and Beat having exited Peru, while new entrants are restructuring their strategies to establish a presence. For example, Yango and InDrive (Russia), and Didi (China) have lowered vehicle and driver requirements and waived commissions to attract drivers (Manky et al., 2024). Geographically, 80% of rides and deliveries occur in Lima, Peru's capital, though some companies either have a presence or plan to expand into other major cities (Instituto Peruano de Economía, 2023). It is estimated that in 2023, the platform industry contributed 0,59% to Peru's Gross Domestic Product (GDP) and involved 2 million users, 133,000 drivers and delivery workers, and 10,000 restaurants and other services (Ibid.).

Peru's extensive informal economy is considered a key driver of the rapid growth of digital platforms in the country (Fairwork, 2023b, 2025a; Manky et al., 2024). Peru has the second-highest informality rate in the region at 71%, just below Bolivia (82.3%), and significantly above the regional average (46,7%) (OIT, 2025b). In addition to the majority of the population working outside formal employment, Peru's platform ecosystem functions against the backdrop of the deregulation and liberalisation of public transportation. In 1991, as part of neoliberal reforms to attract private investment, Alberto Fujimori's government eliminated fare controls and established free competition in public transport services nationwide. This law allowed any individual or legal entity, as well as any vehicle (except trucks and two-wheeled vehicles), to provide public transportation services (Bielich Salazar, 2009). What was initially seen as a response to the vehicle shortage in public transportation had far-reaching negative effects on the national urban transit system. Drivers worked without formal labour contracts for vehicle owners, leading to fierce competition to attract users and a culture of reckless driving (Ibid.). In 2024, there were over 86,000 traffic accidents, resulting in 3000 deaths, with reckless driving accounting for 60% of these fatalities (Mendonza, 2025; ONSV, 2026).

When Uber launched in Peru in 2014, the platform found fertile ground for expansion. Unlike in other Latin American cities such as Buenos Aires or Mexico City, there were no organised taxi unions and thus, no resistance from drivers (Researcher, 20/02/2026). Users also welcomed the company as a solution to the precarious offer in public transportation. As a result, between 2021 and 2022, it was estimated that the number of rides through digital platforms increased by 78% (Instituto Peruano de Economía, 2023), with users in Lima rating ride-hailing apps as a satisfactory service (71%) compared to buses (20%) or traditional taxis (35%) (Lima Cómo Vamos, 2024).

Digital platforms, especially for transportation, have certainly standardised the process and offered some safety guarantees (to users). Probably not absolute guarantees, but I do subscribe to the hypothesis that these platforms have standardised the service and,

therefore, formalised something that, compared to cities similar to Peru, doesn't operate that way (Researcher, 25/02/2026).

Digital platforms in Peru face a paradoxical situation: they are taxed but not audited. In 2024, the 'Netflix Law' was passed.¹⁹ This law gives the Peruvian government authority to withhold income tax on payments made to foreign digital platforms operating in the country. It also mandates that platform companies must register with the national tax system. This law has been described as an 'entrance door' for discussions on 27 bills that impose additional obligations on location-based digital platforms, focusing on labour issues and whether the law should acknowledge a worker status (CSO representative, 19/03/2026). However, no bills have been approved yet.

There is limited official data on platform workers in Peru, with most available sources focusing on profiles of hail drivers and delivery workers (Azuara et al., 2025; Instituto Peruano de Economía, 2023). A 2023 study on these sub-sectors shows that over 90% of platform workers are male and have completed secondary education. Regarding age, hail-driving workers are mostly over 40 (44%), whereas delivery workers tend to be younger, with 21% under 25. A notable difference exists between the sectors in terms of migrant presence: 88% of hail-driving app workers are Peruvians, while in delivery apps, the majority of workers are Venezuelan migrants (60%) (Instituto Peruano de Economía, 2023).

Since 2017, Venezuela has faced an 'exodus' of people driven by political persecution and economic crisis (Broner, 2018). It is estimated that 7.9 million Venezuelans have left their country, with 6.7 million relocating within Latin America (ACNUR, n.d.). Peru is the second-largest recipient of Venezuelan migrants, having received 1.5 million, accounting for 3% of the country's total population (Banco Mundial & ACNUR, 2024). For Venezuelans in Peru, digital platforms serve as a vital lifeline, with 79% of drivers and 68% of delivery workers relying solely on them (Instituto Peruano de Economía, 2023).

The connection between vulnerability and platform work was also clear during the COVID-19 pandemic. Peru experienced one of the highest death tolls globally and faced a significant GDP decline (-11%) (BCRP, 2021; Reuters, n.d.; TVPE, 2020). During this period, demand for services via digital platforms boomed, with daily food delivery demand increasing by 120% between 2020 and 2021 (Instituto Peruano de Economía, 2023). Although the Ministry of Labour set a guideline to prevent contagion for all companies, this guideline did not apply to platform workers because they lack a fixed workspace and an employment relationship (Fairwork, 2023b). In some instances, platforms provided protective items such as alcohol and masks, but a national survey found that 72% of workers deemed these measures inadequate (Ibid.). Additionally, during a police intervention in one of Lima's wealthiest districts, 40% of delivery workers tested positive for COVID-19, highlighting their exposure to risk (TVPE, 2020).

Today, the proportion of the economically active population with adequate employment - i.e., a job that offers income and labour conditions compliant with legal standards and suited to the workers' qualifications - has improved (53%) but is still below pre-pandemic figures (60%) (Salazar, 2026a). In this context of slow economic recovery, nearly half of platform drivers and over 40% of delivery workers use platforms to complement other work or studies (Instituto Peruano de Economía, 2023). Platform workers have benefited from financial inclusion, with 45% having opened a bank

¹⁹ L.D. N°1623.

account (Ibid.). They have also seen higher earnings, 26% above the minimum wage. However, this does not account for depreciation, fuel costs, the lack of social security contributions, or the long hours worked, as drivers spend about 58 hours per week and delivery workers around 68 hours per week, both significantly exceeding Peru's 48-hour legal standard (Ibid.).

In a country with rampant informality and recovering from a global health and economic crisis, platform work has been welcomed as a vital source of income for vulnerable migrants and a means of supplementing earnings. However, the large presence of Venezuelans in the workforce, the state's failure to secure social protection, and the prevalence of informality in the labour sector have slowed the debate over whether platforms should bear greater responsibility for those working through them.

5.2 Main issues affecting working conditions

In Peru, the efforts to improve working conditions in location-based platforms have been halted by five main tendencies:

Platform initiatives tailored to retain drivers, not to protect them

Peru's competitive digital platform market has prompted companies to introduce initiatives that benefit workers and users. However, these efforts are voluntary and lack long-term guarantees. They include protocols to prevent harassment of women users, the option to refuse services in unsafe areas, and low commissions for drivers (Researcher, 25/02/2026). For instance, Didi has formed strategic alliances with government offices and NGOs to promote safe driving practices and provide real-time crime prevention information (Manky et al., 2024). While physical security is a primary concern for workers' organisations in Peru (CSO representative, 19/03/2026), an expert suggests these measures may be more about securing a stable workforce supply than genuinely protecting workers' rights.

When (COMPANY 1) arrived, (workers) could not refuse rides because after a certain number of rejections, they were blocked. (COMPANY 2) took advantage of the whole safety issue to allow drivers to refuse rides to dangerous places (...). So you hear that, and you might interpret it as, 'Wow, (COMPANY 2) cares about driver safety', but it's not like they pay much more than (COMPANY 1). More than a concern for rights, it has to do with how I get (the worker) to stay with me, because it's not like they have too many drivers. What they want are drivers who are always available so that the consumer doesn't have to wait more than three minutes for a car, right? (Researcher, 25/02/2026).

In 2023 and 2025, Fairwork's analysis of Peruvian platforms only found one company (Cabify) scoring at least one point in their assessment of decent labour conditions. In this case, the platform provided evidence of minimum wage compliance, a channel for appeals, and a formal crisis committee for account suspensions (Fairwork, 2025a). In the Peruvian landscape, Cabify remains an exception, as the company is known for targeting higher-income consumers and thus focuses on providing a distinctive service that includes uniforms for drivers (Researcher, 25/02/2026). Still, Fairwork found that all other platforms that were part of the assessment scored near zero, with workers routinely bearing all costs (phone, vehicle, fuel, insurance), and risks (Fairwork, 2025a).

What we currently have in Peru is that all workers lack protection. If a worker on a platform is injured, they have no protection. If they reach a certain age, they won't have insurance. If they get sick, there are no regular medical benefits, only the universal ones from the (Comprehensive Health Insurance) (Public servant, 19/03/2026).

Worker identity and the flexibility trap

In Peru, the discussion among workers regarding their status has shifted over time. In 2019, a first generation of platform workers (predominantly, Venezuelan migrants) demanded formal contracts and labour rights. Nevertheless, a later generation, more influenced by Peruvian labour culture and the benefits of quick earnings from platforms, has started arguing that formal status might harm their situation. They believe it could lead to mandatory contributions and deductions for subpar state services (CSO representative, 19/03/2026).

There's a large segment of the population currently that supports the flexible platform model. That's undeniable; we can't hide it (...) This model offers the advantage of earning income very quickly. I mean, after 24, 48, 36 hours, you're literally generating income. People see it as very tangible. And the platforms know it. (Ibid.).

The move to deny the existence of a work relationship has already led to notable consequences for workers who did not lodge their complaints with the National Superintendency for Labour Inspection (SUNAFIL), despite the fact that SUNAFIL is required to accept any labour complaint, regardless of whether a work relationship is present (Public servant, 19/03/2026). Nonetheless, the most significant factors contributing to job satisfaction among drivers (53%) and delivery workers (32%) are labour autonomy and flexible work hours (Instituto Peruano de Economía, 2023)(Instituto Peruano de Economía, 2023)(Instituto Peruano de Economía, 2023)(Instituto Peruano de Economía, 2023)(Instituto Peruano de Economía, 2023)(Instituto Peruano de Economía, 2023). For some study participants, the flexibility paradigm in platform work has shifted the focus from workers' rights to security within the services, where workers often assume a background role.

Many young people, besides being driven by necessity, choose platform economy work because they've adopted the flawed paradigm of not seeing themselves as workers. It's like, 'Oh, look, I'm in control of my time here. I log on, and if I have to study, I'm not working then. And when my classes end, I go back to working' (CSO representative, 19/03/2026).

When one thinks about rights and platforms, the discussion usually focuses more on how to prevent the motorcyclist from robbing me, and on forcing them to wear the orange vest, preventing two people from getting in at the same time, or requiring the taxi driver to register, rather than thinking of them as subjects of rights. It would be perfectly possible to have that discussion as well, but I think Peru is a country where, culturally, the political culture of congressmen and civil society means that this isn't a crucial issue, so there's a certain sense of helplessness when compared to other countries (Researcher, 25/02/2026).

Framework absence and enforcement gap

The absence of a clear legal framework creates uncertainty and inconsistent requirements for companies, workers, and public agencies that supervise economic activities in Peru. Regarding

SUNAFIL, this agency had to find loopholes to accept labour complaints against digital platforms via virtual reception desks (Public servant, 19/03/2026). Similar issues have been experienced by the Urban Transport Authority for Lima and Callao (ATU), which has to deal with companies with different requirements and uneven guarantees of compliance for services (in this case, hail driving) in an already informal sector.

All platforms have different standards for compliance and for requesting certain requirements (...) Each platform is more demanding than the last. But there are those who validate the information, and then there are those who literally ask for three or four requirements, don't validate them, and nothing happens (...). Informality in general - that is, informality not only in terms of labour, but informality as such in the sector - is extremely high. And when we spoke with ATU, they too found it difficult to curb informality in the sector, especially in a scenario where illegal acts are being normalised (CSO representative, 19/03/2026).

The inconsistency in requirements and services is a major source of informality that platforms use to differentiate themselves from their suppliers (workers) and customers. However, this often occurs at the expense of workers, who must choose whether to comply with such demands without clear incentives in return.

(For platforms) the world is perfect right now. I mean, they're giving workers enough flexibility, they're taking their cut; it's a super competitive market. (...) You have Uber, Didi, Django, Indriver, and Cabify, so there you have five that are killing each other for the market. (...) I was recently in a meeting with people from (COMPANY), discussing protocols for preventing harassment of female passengers by drivers, and of course, it's inevitable that at some point (workers) ask us what they are to (COMPANY). I mean, platforms demand certain things and certain standards, but what exactly do they offer workers beyond using their platform and getting paid for it? (Researcher, 25/02/2026).

Crisis of unions and incipient social dialogue

Peru's low rate of formal employment affects union membership. From 2015 to 2022, just 5% of private sector workers joined a union; 46% were based in Lima, 89% lacked educational qualifications, and 27% worked in construction (MTPE, 2024). In platform work, efforts to unionise were initially led by migrant workers at Glovo. However, when they tried to register in the Ministry of Labour and Employment Promotion (MTPE), their motion was initially rejected due to the lack of a work relationship (Researcher, 25/02/2026). Today, there are two main workers' organisations (see Section 5.7), but they are small and have struggled to gather a significant number of workers for their intervention efforts.

(L)ooking at the case of platform workers, these unions are very small. I mean, they have 20 or more members, I don't think they exceed 100. So, that's going to be a problem for making demands. There are unions in Peru that can have a large number of affiliated workers, allowing them to reach higher-level negotiations, and others that can't (Public servant, 19/03/2026).

I went to a protest in front of the Ministry of Transport, and if I say there were 15 workers, I'm exaggerating. Maybe at the peak moment, there were 15, but there were 5 from a large company. I'm not talking about a small company (Researcher, 20/02/2026).

Strengthening workers' organisations remains a key focus for CSOs advocating for labour conditions on digital platforms (Section 5.7). However, currently, these organisations have not succeeded in negotiating with platform companies, and opportunities for multi-dialogue remain limited.

This dialogue is incipient and takes place in spaces convened by the State; it's not that the platforms are yet sitting down to talk with the unions, there is no recognition of that kind (CSO representative, 19/03/2026).

For a representative of a regional trade union umbrella, in Latin America, unions are struggling to attract younger members as well as workers from new forms of labour like platform work, where the system itself disincentivises collective action and where companies can rapidly change working conditions to frustrate workers' organisation.

We see these challenges from two perspectives. On the one hand, there's the structural precarity faced by platform workers. (...) We observe practices of extreme individualisation of work; so, this is where each worker is treated as an independent entrepreneur, someone who has, in quotes, flexibility. This narrative is what makes the employment relationship invisible and also weakens the perception of labour rights, collective rights. (...) And on the other hand, regarding union organisation, that's another challenge, because there's geographical dispersion, high turnover, and also a fragmentation of work that makes it difficult for platform workers to organise collectively. Platform companies take indirect actions to discourage organisation, such as changes in working conditions. Precisely when they're aiming to unionise, then the working conditions change (Trade union representative, 25/03/2026).

Young people are increasingly less interested in unionising or in any form of organisation. That's where we say we need to renew the form of organisation and that we need young people to be represented in union organising spaces as well (Ibid.).

Ongoing crisis and distrust towards the Peruvian state

Since 2016, Peru has experienced an ongoing political crisis based on a contentious power relation between the Legislative and the Executive power. As a result, in the past 10 years, Peru has had eight different presidents (Quintana, 2026). According to the latest Latinobarometer survey, 90% believe the country is managed to benefit a few powerful individuals. Only 5% approved of the President, and 7% trusted the Congress. Additionally, less than 10% thought it was possible to trust other people (Latinobarómetro, 2024).

Amid widespread distrust of the government and public institutions, study participants showed scepticism about formalising their employment and the benefits of social protection. Labour benefits are seen as reserved for a small elite within traditional, dependent work relations. Regarding pensions, authorities have struggled to reach a consensus on reforms and have recently made pension contributions voluntary for independent workers (Salazar, 2026b). The difficulty in securing labour rights is not unique to platform workers but is a broader issue affecting workers across the Peruvian labour market (Researcher, 25/02/2026).

The challenges faced by platform workers, the urgent ones, are the same as those faced by any worker in the country, stemming from the state's weakness in enforcing the law.

This includes not only labour laws but also basic human rights in the workplace (...) People don't think about insurance, and they don't think about pensions. In fact, it's a real headache for those who formulate public pension policies to convince people to accept mandatory or compulsory systems, because people prefer the liquidity of contributing to a system (Researcher, 25/02/2026).

Why should I pay taxes if the Peruvian state doesn't give me anything in return for its taxing power? How do we argue against a reality that is true? We face the challenge of discussing with other specialists, for example, the fact that yes, it's true, we have authorities who, for example, steal money and don't build roads or hospitals, but that doesn't mean you should evade taxes, right? (CSO representative, 19/03/2026).

The distrust of the state and its services feeds directly into the individualism that characterises workers' strategies. Rather than pursuing collective organisation or regulatory change, most workers focus on optimising immediate income, working across multiple platforms, identifying the best commission rates, and managing their own risk informally (Manky et al., 2024). The combination of widespread labour informality, a weakened state, and declining union membership has slowed progress towards establishing a regulatory framework for digital labour platforms.

5.3 Policy debates

As mentioned earlier, 27 legislative bills regarding platform regulation have been proposed in Peru, but none have become law. The debate around regulating platform activities has coalesced around three axes: labour status (whether workers should be classified as employees), user and worker safety, and, the least developed, digital sovereignty and algorithmic transparency (CSO representative, 19/03/2026, Researcher, 25/02/2026, Public servant, 19/03/2026). Another particular proposal is the creation of a registry of hail-drivers under the authority of the Ministry of Transport and Communications, that could help the state know who is providing these services amidst the current legislation that allows free entrance and competition in public transport (Researcher, 20/02/2026).

Since 2023, the regulation has moved closer to approval. A significant milestone occurred in July 2023 when the Peruvian Congress approved the grouping of four bills²⁰ recognising the dependency relationship between platforms and workers. These laws proposed that platforms should cover insurance costs and affiliate them with health and pension systems (Fairwork, 2023b). This proposal was met with a counter-bill that would sanction companies that allow people to provide services without being affiliated with a pension or health system (Ibid.). Some of these drafts even managed to secure the support of trade union confederations such as the Autonomous Central of Peruvian Workers (CATP) (Fairwork, 2025a). Nevertheless, progress has been hindered by insufficient political commitment and challenges in conducting a transparent debate.

If you're not behind your bill, it won't move forward. And when a member of Congress doesn't push for their bill, it's basically for two reasons: either they're not interested in the issue, or they don't want trouble. It's that simple. So, of all the bills that have advanced and been reviewed by the Executive (power), only three have been approved (...) The most recent one is Bill 842 that includes four other bills. This bill was once again on the

²⁰ PL N° 0018/2021; CR, 0667/2021-CR; 0842/2021-CR; and 1536/2021-CR.

plenary agenda until (Congress members) requested a reconsideration, and it went back to the committee again, but that was basically due to a mishandling of the dialogue. Because you already had, for the first time, the consensus of the platforms, of the companies, you had the political consensus (...) And what happened is that (Congress members) drafted a substitute text behind the backs of this dialogue mechanism that was already institutionalised, and that's not how it's done (CSO representative, 19/03/2026).

In the Peruvian case, the lack of commitment to regulating the sector reflects a wider issue: the absence of political interest and will to secure rights for autonomous and independent workers in general. As noted by a participant, there is a political dissonance between the informal reality of Peru's labour market and the institutional infrastructure to attend to informal workers.

Our Ministry of Labour is extremely focused on standard employment relationships. So it struggles to consider other forms of employment (...). In fact, structurally, of all the Ministry's offices, there's only one tiny office called the Self-Employment Office that has three people and does absolutely nothing. It doesn't produce a single regulation, a national policy, or anything of the sort. The State's proposal for independent work has been abandoned by the labour sector and is now between the Ministry of Production, which actually focuses on businesses, and SUNAT (the Peruvian tax authority), which doesn't focus on labour policy but rather on taxation (Researcher, 25/02/2026).

Due to this institutional dissonance, interest in regulating platform work has largely focused on service-related issues, such as accident and theft rates, rather than on labour conditions (Fairwork, 2023b). This has contributed to 'regulatory ambiguity' (Manky et al., 2024) that directly impacts platform companies in the country. Two notable examples illustrate this. First, in 2023, Didi's plans to launch Didi Moto, a motorcycle taxi service popular in Asia, were halted in Peru after several attempts to ban motorcycles with two riders in Lima and Callao, citing security concerns related to rising theft and *sicariato* in the city.²¹ As a result, Didi was temporarily deactivated (Fairwork, 2023b). Similarly, the Labour Chamber of the Superior Court of Justice of Lima recently confirmed the existence of subordination between a worker and JOKR Peru, a delivery platform, despite the presence of a civil contract (Fairwork, 2025a; IDEH PUCP, 2021). The negative resolutions for platforms have damaged open dialogue opportunities towards their regulation. An expert notes:

We had a very good dialogue with (COMPANY) at one point, but everything changed. Now we don't have that; they're very closed off. (...) They're always very defensive. They record the meetings or are very careful with their word choice, and they always emphasise that they're intermediaries (CSO representative, 19/03/2026).

The difficulty in engaging in dialogue hinders the process of defining one of the most delicate issues of a potential law: the recognition and protection of independent workers. Currently, workers must work at least 4 hours per day to access all labour rights. However, this is not a reality that would necessarily apply to all platform workers.

In Peru, workers with shifts of less than four hours per day or on average per week do not have full labour rights, such as job security, vacation time, or severance pay. So, I can hire a worker for less than four hours and fire them without any consequences. This bill also

²¹ The most recent law prohibiting the circulation of two people on motorcycles in Lima and Callao is the Supreme Decree N°002-2026 of the Ministry of Transport and Communication.

incorporates this provision, stating that platform workers are entitled to these protections and benefits only if their shifts average four hours or more per day. This presents a dilemma because it reinforces the lack of protection that the Peruvian state has already observed for workers with shorter shifts (Public servant, 19/03/2026).

Although there is an urgent need to clarify the sector's legal aspects, the discussion remains stalled. Unlike in Brazil, it has not been a primary focus of the current government's agenda or the election debates for the upcoming presidential term starting in July 2026.

5.4 Rights coverage and social protection

Peru's social security architecture is characterised by uneven coverage across different types of insurance and employment statuses. Regarding health insurance, the percentage of people with access has increased from 65.5% to 91% between 2013 and 2024 (INEI, 2024, 2025). The expanded coverage resulted from health reform efforts aimed at achieving Universal Health Coverage (ASU). Under this reform, the population is covered by the Integral Health Insurance (Seguro Integral de Salud - SIS), Social Health Insurance (EsSalud), or other insurance types (INEI, 2025), with SIS specifically serving as a government subsidy for the poor and extremely poor populations (Gob.pe, n.d.).

Conversely, in the case of pension, severance and unemployment insurance, progress in coverage has been slower. Peru's pension system is divided into two: Pension Funds Administrators (AFPs), which are private, and the Pension Standardisation Office (ONP), which is public. Any worker can choose voluntarily which type of system they wish to contribute to. From 2001 to 2021, the number of people contributing to the pension system grew substantially, with a 194% increase in AFPs and a 345% increase in ONP. However, only one in four Peruvians contributed to any pension system, and 85% of those in the lowest quintile were not affiliated with any pension scheme (ComexPerú, 2022). Thus, when excluding healthcare and sickness benefits, it was estimated that only 29,3% of the population was covered by at least one social protection benefit, far below other countries in the region, such as Chile (70%) and Mexico (62%) (APEC, 2021).

Although independent workers can choose to contribute to a pension scheme voluntarily, many platform workers are reluctant to do so. A 2023 study shows the main reasons include believing their income is too low to contribute (41%) and not trusting that they will receive their pension (26%) (Instituto Peruano de Economía, 2023). This hesitation among workers is not unique to Peru; it highlights the broader issue of increasing instability among independent and informal workers, the challenge of encouraging long-term insurance over immediate needs, and widespread mistrust in the institutions that manage these systems. If upcoming legislation mandates minimum social protection for workers, relying solely on voluntary contributions may lead to similar disappointing outcomes.

5.5 Anti-discrimination measures

The platform economy in Peru, especially in delivery services, heavily relies on Venezuelan workers. As noted earlier, only 39% of delivery couriers - currently the fastest-growing segment of the platform workforce - are Peruvian nationals (Ibid.). Venezuelan workers are mainly men, but

women make up a larger share of them (6%) than among Peruvian workers (2%). Venezuelan platform workers tend to be younger and better educated, with about one in three holding a university degree, compared with 13% of Peruvian workers (Ibid.). However, their educational qualifications do not offer much advantage in the labour market. Platforms serve as key entry points for migrants into employment. Venezuelans are more likely than Peruvians to rely on platforms as their main or only source of income, and 32% use them as a last resort to find work, compared with 46% of Peruvians. Survey data also indicates that their hourly earnings through platforms are 37% to 42% higher than what they would earn in alternative jobs (Ibid.), showing that platform work offers a profitable income opportunity for migrants in the country.

The dependence of Venezuelans on platform work creates legal hurdles for regulating it without negatively affecting this group of workers. For instance, Peruvian law currently limits the proportion of foreigners in a company's payroll to 20%. Thus, for delivery platforms, recognising workers as full-time employees would adversely affect Venezuelan workers, who make up almost 40% of this sub-sector. Any upcoming platform regulation needs to consider how workers' status can exclude this vulnerable segment from formal employment relationships.

Another challenge relates to how xenophobia can affect platform workers. A 2021 survey found that 70% of respondents believed Venezuelan migration negatively affected the country, 94% thought it contributed to insecurity, and 83% saw it as a threat to Peruvian jobs (Amaya & Elguera, 2023). Furthermore, a labour expert pointed out that xenophobia against these workers is a factor to consider when examining the low level of citizen support for platform workers' demands. Despite the hostile environment, regulation debates have not been explicit regarding how to avoid or reduce discrimination in platform work.

It's impossible to separate Venezuelan migration from apps in Peru. It's very present. I think that might also explain the lack of solidarity among Peruvian citizens at times, given the additional problems we have with xenophobia, links to crime, and everything else in our country (Researcher, 25/02/2026).

Another underrepresented group in the regulation debate is women. Although they represent less than 10% in both delivery and hail-drivers apps, some platforms have run visible initiatives around this gap (Instituto Peruano de Economía, 2023). For instance, Didi's initiative to connect female drivers and passengers (Didi Women) was cited as increasing the number of women drivers in Didi Peru by 46% in 2022 (Manky & Mogollón, 2024). Similarly, Cabify launched a [collaboration](#) with Perú Pendiente, a local NGO, to promote women's participation in apps, offering financial education and safety awareness (Fairwork, 2025a). Although these private initiatives mark an initial step toward gender inclusion in platform categories traditionally dominated by men, they do not specify how they will translate into grievance mechanisms or overall measures to create safer and more welcoming work environments for women.

A more concerning trend, with direct implications for women, is the rise of domestic and care work within the platform sector. In the last year, Fairwork recognised two platform companies targeting this sector: [Hadas](#) and [Loop](#). Domestic work is almost entirely female, and until recently, the subject of hard-won legal gains. In 2020, the Law for Domestic Work was enacted, establishing a minimum remuneration for workers, a maximum workday, the right to weekly breaks, and the employer's

obligation to affiliate with and cover the worker's contribution to Essalud.²² Critically, the law prohibits intermediation in domestic work.²³ However, Hadas was found to operate by classifying domestic workers as autonomous contractors, claiming to fall outside the law's scope (Fairwork, 2025a; OIT, 2025a).

Peru has a unique situation: the law regarding domestic workers prohibits intermediation (...). Digital platforms have come in and changed that logic; they present themselves as intermediaries, but in reality, they do something very similar to Uber: they monitor how the service is provided and how the service is contacted. In fact, some of these platforms explicitly prohibit domestic workers from exchanging data with the clients' employers so they aren't hired directly. All contact, payment, and fees are handled through the platform. It completely falls outside the legal framework; they operate in a scenario where it's totally illegal because domestic work is very clearly defined (Researcher, 25/02/2026).

Despite the low level of union membership in Peru, domestic workers remain well organised. They successfully advocated for the ratification of Convention 189 on Decent Work for Domestic Workers in 2018 and later influenced the enactment of a national law for the sector (Silva, 2023). The rise of platforms that facilitate this type of work has raised concerns among some study participants, as classifying workers as independent contractors excludes them from domestic worker protections. However, Loop, ironically, [markets itself](#) as a platform that ensures 'decent work' and has been recognised by USAID and the Inter-American Development Bank (IDB) for aiding Venezuelan workers' integration into the labour market.

LOOP is especially interesting because the person who created it also owns a formal employment agency, so it has a real, formal side, but it also has a digital side, which is what has won it awards. What's interesting is that it has won social responsibility awards. An app that doesn't formalise employment wins social responsibility awards ... (Researcher, 25/02/2026)

In countries like Argentina, platforms for domestic work have sought to provide more transparency on wages and formalisation processes for workers. For instance, a recent ILO study documented the case of Zolvers, which provides consumers with the option of an [online calculator](#) to verify if workers are receiving fair compensation, above the minimum wage (OIT, 2025). This type of information could help to verify if platforms are compliant with the stipulations of national frameworks for domestic workers. Unfortunately, in the Peruvian case, similar measures have not been introduced, raising concerns about how, even in sectors that have achieved regulatory recognition, their rights are not guaranteed under the current trend towards digital platform work. As a trade union representative put it:

It's really disturbing because (domestic work) is a sector that's been fighting for a long time for formalisation. I mean, they've fought hard. I'm not going to talk about compliance, but at least the regulatory framework - there's a lot of progress trying to achieve fairer working conditions. To see that in this sector that's working towards formalisation, a digital platform bursts onto the scene with extreme job insecurity, with the distortion of labour relations ... I mean, it's shocking because it opens the door for other sectors, whether it's

²² Law N°31047

²³ Art. 14

moving towards formalisation or already part of the formal economy (Trade union representative, 19/03/2026).

5.6 Algorithmic transparency

In Peru, progress for overall transparency in platform work is inconsistent. On the one hand, there is evidence that companies such as Urbaner and Cabify are clarifying the terms and conditions for workers using their apps, including the handling of personal data and fees (Fairwork, 2023b). Other companies like Didi and InDrive have also made fee transparency a distinctive feature, allowing drivers and users to negotiate trip prices before accepting a service, and to reject rides without penalisation (Manky & Mogollón, 2024). This power of decision-making and negotiation has proved popular in Peru, resulting in a 30% increase in registered drivers on Didi, and has been expanded to other Latin American markets such as Colombia and Mexico (Ibid.).

However, behind drivers' apparent decision-making power lie notable gaps regarding penalties. The latest Fairwork report indicates that none of the companies examined provided details on rewards, ratings, and penalty conditions (Fairwork, 2025a). Additionally, Fairwork previously identified instances in which platforms used GPS data to detect whether drivers and couriers were involved in protests against them, resulting in deactivations (Fairwork, 2023b). The potential retaliation that workers may face for prioritising their own safety is a key issue in the debate, especially in Lima, where 78% of the population feel unsafe (Lima Cómo Vamos, 2026).

There have been cases not only of violence against delivery drivers, against people who provide transportation services, but there are also people who have requested taxis through apps just to assault (drivers). And there are people who provide services for Cabify, Uber, Yango, who tell you there are areas they don't accept (services), but when you reject (the ride), the algorithm penalises you (CSO representative, 19/03/2026).

5.7 Worker representation

The worker organisation in Peru has slowly evolved. The earliest collectives emerged in 2019, when Glovo couriers in Lima formed '*Glovers en Peru*', which would later become part of the movement 'Not One Less Delivery Driver in Peru', emulating the regional women's movement ('*Ni Una Menos*') (Fairwork, 2023b).

The more significant progress came in the last two years. Following the mobilisations of delivery workers from Rappi in May 2023, workers created the National Union of Digital Platform Workers of Peru (SINTRAPLADI in its Spanish abbreviation) (Ibid.). However, the union's formal registration was difficult. The Ministry of Labour initially questioned whether workers were subordinate as employees, and therefore, if they could create a union at all. Moreover, questions were raised about the migration status of some founding members. Finally, in 2023, SINTRAPLADI received formal recognition and two months later, a second organisation was constituted: the Trade Union Organisation of Professional and Self-Employed Drivers (OSCPA), representing primarily drivers who identify as self-employed rather than dependent workers (Fairwork, 2025a).

The two unions represent different positions within the broader platform debate. While SINTRAPLADI has prioritised the recognition of a labour relationship and a situation of

subordination and economic dependence towards platform work, OSCPA has focused on minimum rights for self-employed drivers (insurance, protection against arbitrary deactivations) (Ibid.). Still, both positions were represented in the Working Group on Platform Economy convened by the National Labour and Employment Promotion Council (CNTPE) in 2025, where the unions participated alongside government representatives, platform companies, business associations, ILO, and the urban transport authority (Ibid.). Moreover, two main labour confederations, CGTP and CATP, have provided political backing (Researcher, 25/02/2026, CSO representative, 19/03/2026). Still, platform workers' organisations have three challenges to mobilise their interests in public dialogue.

First, the organisations are small; they are mainly focused in Lima and have struggled to rally workers in protests, with participants noting that one of these organisations has only 20 members, and most of them are Venezuelan immigrants.

Everything is in Lima, even for the workers' union, which aims to be national. Still, it struggled enough to recruit people here in Lima. The drivers aren't even organised, so that organisation is even more precarious (Researcher, 25/02/2026).

I remember they held a couple of strikes, but they weren't very effective, perhaps because of the union's small size. It can't be as effective or efficient at getting employers to the table, reaching an agreement, or negotiating benefits. It's a newly formed, small union, a union of foreign workers. If they want to take any action to alleviate their current situation, the effects probably won't be very significant (Public servant, 19/03/2026).

Second, as these organisations are still developing, they must find alternative methods to mobilise beyond protests. This involves partnering with other entities, mainly NGOs and unions, to ensure their interests are part of broader discussions. Additionally, a participant observes that platform users could raise greater awareness about the issues faced by platform workers. However, this avenue has not yet been leveraged.

The unions need to be clear that the mechanisms of pressure must be different. There's something very interesting about generating some pressure on the company through users (...) The user actively participates in the working relationship, something we don't have in traditional work. So if the user starts to realise that this platform is not socially responsible towards its workers, then they can say something (CSO representative, 19/03/2026).

Another challenge for union platforms is that, while they are backed by larger workers' organisations, these organisations are also experiencing their own crises, such as a lack of strong leadership and insufficient knowledge of workers' struggles beyond traditional labour sectors. A participant points out that the weakening of these umbrella organisations could hinder the efforts of new unions to raise awareness among emerging sectors.

There is this working group, led by the Ministry of Justice and Human Rights, which is the Due Diligence and Business Working Group. And none of its proposals revolves around digital platforms. So, it's as if these issues about good corporate governance, supply chains, and due diligence - something that has been discussed for a long time with

approved regulations - are not on their radar. I feel that Peruvian unions have somehow missed out on these conversations (Researcher, 25/02/2026).

Currently, platforms in Peru do not mention the right of workers' organisations, although some have created grievance channels (Fairwork, 2025a). Upon the incipient movement, beyond the approval of an ad-hoc regulation, workers' organisations could benefit from training, new leaderships, data generation on the sector, and information exchange (Researcher, 25/02/2026, CSO representative, 19/03/2026, CSO representative, 19/03/2026), as well as connecting with other stronger unions to participate in more international forums to pressure national actors. A representative from a trade union umbrella shares,

We have done several things - documentaries, informational capsules - because there are always requests for information. However, workers, especially foreign workers, need to see how various systems work (in Peru). So, capacity building is very important, but keeping in mind that it's a different dynamic than the traditional one (Trade union representative, 19/03/2026).

The right to work, regardless of whether you're a platform worker, a dockworker, or a construction worker, is a universal right, regardless of whether you're a foreigner or a national. The right to work, but the right to decent work, isn't exclusive to any one sector. So, that allows us to connect with other sectors as well and I think that this support network, over time, has even allowed us to engage in dialogue with other types of networks, including international ones (Ibid.).

For another trade union umbrella representative, these efforts must be accompanied by regional exchanges to build capacity, share experiences, and develop a common agenda.

I believe that union training and capacity building are essential for unions to develop new organisational tools. Likewise, contributing to international political advocacy is crucial. And another important contribution could be the exchange of experiences between countries, allowing us to learn about the challenges they have faced in organising. This exchange would help us understand how national legislation has progressed, as in Mexico, Chile, and Uruguay (Trade union representative, 25/03/2026).

Cooperation is very important to us, going beyond financial cooperation. It also involves cooperation in building, cooperation in constructing and developing a shared agenda to advance on certain issues, and this is what will help us to move forward with platform work (Ibid.).

6 INDONESIA

6.1 Platform landscape

Indonesia is Southeast Asia's largest digital economy, with an estimated one in five Indonesians participating in digital livelihoods in some form (DFS LAB; RISE, 2023). In 2022, the digital economy produced US\$77 billion in the country, with platform work as one of its defining features (Fairwork, 2023a).

The origins of location-based platforms date to 2010, when Gojek launched a local online taxi platform, followed by Uber and Grab in 2014 (Fairwork, 2023a; Silaban, n.d.). Initially, platforms closely followed Uber's car-based ride-hailing model. However, in 2015, Gojek revolutionised the sector by introducing motorcycle ride-hailing, which offered a faster, more affordable and better-suited option for drivers and users to move around congested urban areas (Fairwork, 2025b). Today, two companies dominate the platform ecosystem: Gojek and Grab (which acquired Uber). They control over 90% of the ride-hailing market and have evolved into 'super apps' offering a variety of on-demand services, including transport, food delivery, and groceries (Fairwork, 2023a). The other 10% is represented by several smaller, emerging players such as Maxim, Borzo, Deliveroo, and Lalamove (Ibid.).

As in the other case studies, the COVID-19 pandemic was a significant boost to the growth of platform work, as mobility restrictions shifted consumption patterns toward online services, swelling platforms' user bases while pushing many workers displaced from formal employment into platform work (Fairwork, 2025b; Silaban et al., 2021). In 2023, the informal employment rate was 81%, with many workers absorbed into platform work (ILO, 2023b). Gojek alone reports having 3.1 million drivers (Fairwork, 2025b), and Grab 2 million (Silaban, n.d.). Workers are predominantly male (81%), and between 21 and 40 years old (76%). Moreover, most hold secondary education, reflecting the broader pattern of Indonesia's labour market, where 87% of workers have completed high school or less (Fairwork, 2025b; Silaban, n.d.).

The growth of platform work and app contributions to the national economy has given platform companies significant influence over both workers and policymakers (Fairwork, 2025b). A clear example of how platforms are intertwined with Indonesia's political elite emerged in 2024, when Nadiem Makarín, founder and former CEO of Gojek, was appointed Minister of Education, Culture, and Research (Ibid.). The proximity of platform companies to decision-making circles and the growth of platform work stand in contrast to reports of deteriorating conditions in the sector.

6.2 Main issues affecting working conditions

In Indonesia, four main problems contribute to the worsening of working conditions in digital platforms:

Expansion of the workforce with progressively diminishing returns

In 2014, during the early boom of platform work in the country, companies provided important incentives to make platform work attractive to drivers and other workers. For example, Gojek was reported to hold mass recruitments through bonuses that enabled some workers to earn up to IDR 11 million (USD 678) per month, well above the prevailing minimum wage²⁴ (Fairwork, 2025b). From 2016 onwards, progressive reductions in bonuses, compounded by the COVID-19 pandemic, led to a sharp decline, with average daily earnings in Jakarta falling by 43% between 2019 and 2023. Today, workers report an average gross income of around IDR 160,000 per day (USD 9.80) before expenses, which shrinks to just IDR 30,000 (USD 1.80-3.00) after deducting fuel, vehicle maintenance, mobile data, and food (Ibid.). Similarly, Gojek and Grab introduced 'controversial features' to push drivers to accept lower fares in exchange for better and more access to job orders (Ibid.). Platforms were also reported to implement algorithms that penalise workers with fewer job orders for taking more than two days off from work (Novianto et al., 2023)(Novianto et al., 2023).

The income decline affects digital platform workers differently; those in online platform jobs still report earning two to three times as much per hour as ride-hailing workers. Nevertheless, ride-hailing workers spend 56 hours weekly, far above the 30-hour average for platform workers in Indonesia (DFS LAB; RISE, 2023). The lower earnings of hail drivers compel them to seek alternative sources of income. One common strategy is using multiple apps, which has become an essential coping mechanism. A survey revealed that 87% of hail-drivers operate on more than one platform simultaneously to manage the irregularity of orders on a single app (Novianto et al., 2023). Amid slow economic recovery, a participant noted that platform hail-drivers are 'stuck' in the sector.

For most of the drivers right now, especially the two-wheel drivers, they don't see this as a safe source of income because it's harder to earn money from this. They still can earn money from this, but it's harder, especially if you compare it to before COVID era, what they get per day in terms of ... amount of job or amount of money is really much lower compared to back then. So many people are really considering to leave this job if they have the option. But if not, then well, this is the only job that's available for them, so they don't really have other choice (Researcher, 31/03/2026).

While writing this report, a key initiative was announced by President Prabowo during his Labour Day speech (May 1st): capping ride-hailing and other platform commissions at 8%. This marks a notable improvement from the previous cap of 20% (Soeriaatmadja, 2026). The announcement was also followed by additional measures such as providing health insurance to platform drivers. The announcement marks an important win for platform workers' organisations and reflects the political power they are gaining in the country.

Partners by law, workers in practice

Despite Indonesia's economic importance as a destination for the expansion of digital platforms, the country still lacks a legal framework that addresses workers' rights and needs in the sector. Currently, digital platforms in the transport sector operate under the Law on Micro, Small, and Medium Enterprises (SMNEs) that uses the concept of 'partnership system' (Silaban et al., 2021).

²⁴ In February 16, the minimum wage in Jakarta was reported to range from USD 103 to 224 per month (Fair Labor Association, 2016).

This concept derives from the Indonesian Civil Code which defines business partnerships as mutually binding agreements between two or more parties to invest or contribute with the objective of sharing profits (Putri et al., 2023). Under this law, workers and platform companies are '*mitra*' (partners) and hold legally equal positions (Fairwork, 2023a, 2025b). Indonesia's Labour Law does not recognise the term 'partnership', and therefore, platform work falls outside traditional labour regulations (Fairwork, 2023a). The partnership system has been reinforced by additional regulations from the Ministry of Transportation,²⁵ the Ministry of Communication and Information,²⁶ and the Ministry of Manpower²⁷ that have added additional clarification about the responsibilities of each partner in platform work, establishing that workers are responsible for the operation and safety of their services, while companies establish operational procedures to maintain service standards (Fairwork, 2025b; Silaban et al., 2021).

Establishing workers' status within a partnership system has brought several drawbacks for employees. For example, wage regulation falls under the Ministry of Transportation rather than the Ministry of Manpower, creating fragmentation across ministries over workers' rights and weakening their enforcement (Silaban, n.d.). Additionally, under an equal partnership agreement, unions are unable to formally represent workers, and employees cannot voice their concerns through official channels (Novianto et al., 2023; Silaban, n.d.). Despite some organisations claiming a false partnership based on conditions set by platform companies and payment processing through them, the ambiguous space allowed by the partnership system - operated by platform companies without covering labour rights costs - is being copied by other firms choosing a partnership model over standard employment agreements (Fairwork, 2023a). This sets a harmful precedent for further informalisation in the labour market.

Economic ties to platforms through rental agreements

As in the Brazilian case, there have been reports of economic ties between workers and platforms through rental agreements (Fairwork, 2023a; Gojek, 2025). Leveraging the government's interest in expanding electric vehicle (EV) adoption in Indonesia, companies such as Gojek are offering leasing agreements that combine a daily fee with a monthly trip target and even provide a monthly bonus as an incentive for workers who adhere to the system (Gojek, 2025). In the case of two-wheel vehicles, Gojek even launched a partnership with a battery swapping provider (Gogoro) to encourage workers' shifting to EV (Yilmaz, 2021).

The push for EV adoption has been promoted as a sustainability measure to cut carbon emissions in platform work (Fairwork, 2023a). Although this rental system allows people without personal vehicles to participate in platform work and reduces their vehicle upkeep expenses, it imposes a rental fee deducted from their already shrinking income. Those unable to pay the daily fees risk being suspended from the platforms (Ibid.). Additionally, the monthly bonuses offered to system enrollees motivate debt accumulation by promising potential income growth, concealing the fact that this increase may require extra working hours and pose financial risks if payments are late.

Worker stratification within platforms

Platform companies in Indonesia are adopting subscription schemes for workers, allowing those who pay an extra fee to gain priority access to job opportunities and income incentives (Fairwork,

²⁵ Regulation No° 12/2019

²⁶ Regulation No°1/2012

²⁷ Regulation No°2/2021

2025b). These subscription fees are seen as establishing a two-tiered system that exacerbates inequality within the workforce, as those who subscribe enjoy advantages similar to rental systems, such as shorter wait times between jobs and more work orders (Ibid.). Stratification has also been noted based on ratings systems, with companies willing to cover social contributions of higher-rated workers, approaching social protection as an incentive instead of a labour right.

(Platforms) encourage workers to join the program so they have a protection from the government. Platforms like Gold Check and Grab are also willing to pay for this premium but only for those that have super high ratings (Researcher, 31/03/2026).

Tensions and invisibility within workers' organisations

As previously mentioned, the partnership agreement between hail-drivers and platform companies sustained by the SMNEs Law does not recognise workers' organisations, unions and workers' associations. A situation that is recognised as ironic within the current partnership, *'(Workers ask) If we are partners, then why can't we negotiate anything?'* (Ibid.). Still, several organisations have emerged at various levels (see Section 6.7). These organisations have managed to achieve some important gains. For example, in February 2025, drivers took to the streets demanding recognition of the Religious Holiday Allowance for Eid al-Fitr, which formal workers receive. This led to a one-time bonus payment (Fairwork, 2025b). In May 2025, half a million drivers threatened to strike over issues such as companies deducting up to 50% of earnings, exceeding the 20% cap set by the Ministry of Transportation (Budi, 2025). As mentioned before, in May 2026, the cap has been reduced to 8%.

Despite their organisational capacities, the demands of platform workers are divided between those who want formal recognition of their employee status and those who prefer to maintain their status as independent freelance partners (CSO representative, 12/03/2026/FAIRWORK 2025). Moreover, it is worth noting that these organisations mainly represent drivers and delivery workers, leaving out other categories like cleaners and cloud-based freelancers who exist within the same ecosystem but are less visible in policy discussions (CSO representative, 19/03/2026; 12/03/2026/) (DFS LAB; RISE, 2023).

6.3 Policy debates

The regulatory situation for platform work is currently trapped by the partnership system and the fragmentation of regulations that touch upon platform work without a proper recognition of labour rights in the sector. As a result, in Indonesia, depending on the services, platform workers' situation may be monitored by certain institutions. For example, there is a transport regulation that touches on drivers' rights and obligations and caps tariff calculation, while the Labour Law recognises the right to minimum wage, worker union, training and development, and social security for cleaners (Fairwork, 2023a)(Fairwork, 2023a)(Fairwork, 2023a)(Fairwork, 2023a)(Fairwork, 2023a)(Fairwork, 2023a)(Fairwork, 2023a)(Fairwork, 2023a)(Fairwork, 2023a). More recently, the Ministry of Communications and Digital Affairs introduced a regulation for commercial postal services²⁸ that directly affects couriers on digital platforms, establishing key provisions including delivery weight limits, requirements for formal cooperation agreements with independent service providers, and pricing models that must be revised every six months (Fairwork, 2025b)(Fairwork,

²⁸ Regulation No°8/2025

2025b)(Fairwork, 2025b)(Fairwork, 2025b)(Fairwork, 2025b)(Fairwork, 2025b)(Fairwork, 2025b). Despite the advancements, efforts to improve regulation in the sector clash with companies' compliance. The strikes of May 2025 were a direct response to platforms' not respecting the established 20% cap for deductions, with the government siding with companies.

In reality, when many workers were protesting, asking for lower platform cuts, the government didn't really do anything. Instead, it actually accepted the platform explanation or rationale that they did not cut from the workers' earnings (Researcher, 31/03/2026).

The debate of how to consolidate regulation has moved very slowly with limited examples of similar countries finding a legal solution. Besides Malaysia, two participants mentioned the South Korean experience as a relevant example of additional measures of protection for workers like establishing higher tariffs depending on the times and seasons (e.g., Ramadan), and limiting discount programs that directly affect workers' income (CSO representative, 12/03/2026).

The ongoing debate over a new labour law (similar to the 2020 Omnibus Law aimed at supporting foreign investment and job creation) represents a chance to integrate the platform sector into a broader labour framework (Ibid.). However, whether this will be achieved remains uncertain. The political climate is adverse, as platform companies have positioned themselves as social shock absorbers during a sluggish economy (Researcher, 31/03/2026). There is also concern that a former minister who supported the movement has become discredited because of links to corrupt practices (CSO representative, 12/03/2026). Given this situation, a future comprehensive law for platform work is uncertain.

There is still a debate on this since 3-4 years. The previous presidency has proposed a consolidation of labour law, to simplify the labour law (...). The debate about platform work might be one topic of this reform, but it is not clear which direction it will go. I'm not very optimistic that the employment status will change: it's 4 million workers (in platform work). It is not realistic that (workers' protection) will be covered by the system for formal employees (CSO representative, 12/03/2026).

6.4 Social protection

Since 2023, platform workers have been classified as Non-Wage Earner Workers in the social protection system known as BPJS Ketenagakerjaan (Employment Social Security Administration), which covers both formal and informal workers (Asanify, n.d.; Fairwork, 2023a; Silaban et al., 2021). This government-managed program includes five schemes available to formal wage earners: work accident insurance, death benefits, old-age savings, pension plan, and unemployment insurance (Silaban, n.d.). However, in the case of Non-Wage Earners, like platform workers, only two schemes apply: work accident insurance and death benefits (CSO representative, 12/03/2026). In terms of health coverage, the vast majority of Indonesians (98%) are covered by BPJS Kesehatan, the result of a decade-long effort to consolidate the health sector from 300 schemes into a single program (World Bank, 2026b).

Under the partnership system, contributions to the BPJS Ketenagakerjaan for platform workers are entirely voluntary (Silaban, n.d.). Although the monthly contribution is relatively low at IDR

16,800 (USD 1.00), recurring reductions in monthly income have hindered the system's expansion (Fairwork, 2025b). As a result, in 2024, it was estimated that only 206,000 workers were contributing to social protection; a small proportion considering that two companies have at least 4 million workers in their platforms (Silaban, n.d.). Union advocates have demanded that platform companies should be required to contribute to the two available programs for workers (CSO representative, 19/03/2026). Although this demand is not yet incorporated into the current legal framework, there have been some public and private efforts to achieve it.

For example, recently, the government launched an economic stimulus program that subsidised about 50% of the premium for workers who opted to join BPJS Ketenagakerjaan (Ibid.). Meanwhile, in 2018, Gojek partnered with BPJS to introduce the Swadaya program, adding a social insurance contribution to its service charges (Hunt & Samman, 2020; Kool et al., 2021). However, we were not able to confirm the maintenance of this contribution, with another study indicating that these contribution rates were decreased multiple times without prior notice (Kool et al., 2021), highlighting the fragility of workers under voluntary protection schemes. Similarly, Gojek and Grab have also announced their willingness to cover premiums for their highest-rated workers (Researcher, 31/03/2026), furthering inequalities within their platforms.

Additionally, these two companies offer optional accident insurance, safety training, emergency helplines, helmets and jackets, and discounts on key supplies and operational costs (e.g., fuel, mobile data) (Fairwork, 2023a, 2025b). Smaller players like Goto even introduced the Gotong Royong Share Program with the goal of distributing company shares to workers; however, with certain conditions ('loyal' driver partners) (Goto, 2022). Finally, at the local level, ad hoc arrangements have emerged, including some hospitals offering to pay BPJS contributions for drivers willing to transport patients (CSO representative, 19/03/2026) (Silaban, n.d.).

The Indonesian case demonstrates how innovative solutions to enhance social protection coverage for platform workers can arise from both private and public actors. However, if these opportunities are not established as legal obligations, workers remain vulnerable to changes in the rules governing their access, especially those who lack the capacity to meet the eligibility criteria.

6.5 Anti-discrimination measures

Platform work in Indonesia, especially ride-hailing and delivery, remains predominantly a male domain. However, compared to Brazil and Peru, these sectors experience a larger presence of women (nearly 20%) (Fairwork, 2025b). A 2023 survey found that 78% of women respondents reported their first job experience was on a digital platform (DFS LAB; RISE, 2023). For the majority, joining digital platforms has improved their social status and work-life balance (80%) and has been an important means of increasing their income after the pandemic (Ibid.). The same study noticed that joining a digital platform increased women's chances of accessing a formal loan in 73% (Ibid.).

Despite the social and economic benefits, women in ride-hailing and delivery face similar discrimination dynamics as seen in other case studies, which put them at a disadvantage compared to their male peers. Male customers often cancel orders after discovering the driver is a woman, impacting the number of daily orders they can complete. This results in reduced earnings from lost direct fees and failure to meet the ride requirements needed to qualify for platform

bonuses (Putri et al., 2023). Thus, it is structurally harder for women to meet the metrics set by the platforms' algorithms (Ibid.).

Some platforms have introduced features to address gendered safety concerns, most notably, the option for female passengers to request female drivers (CSO representative, 19/03/2026). However, this feature primarily addresses customers' comfort and concern rather than worker protection, and does not help resolve the underlying discrimination experienced by female workers in delivery and ride-hailing apps.

According to Fairwork's reports for Indonesia, no platform has implemented anti-discrimination policies to address gender-based cancellations or ratings (Fairwork, 2023a, 2025b). Considering that Gojek and Grab -Indonesian top platforms- are known for pushing rankings and subscriptions to categorise workers within their systems, gender-blind management algorithms and policies can directly affect the growing base of women in platform work.

6.6 Algorithmic transparency

In Indonesia, the dominance of two main super-apps combined with the absence of legal measures for transparency results in a significant power imbalance between platforms and workers. It is reported that Grab collects 40 terabytes of data daily from workers, equivalent to about 20 billion pages if printed (Silaban, n.d.). Companies possess extraordinary amounts of detailed knowledge about workers' (and customers') behaviour, but workers understand very little about the systems that govern their work.

Platforms in Indonesia have been found to provide information on the terms and conditions of work, but not on the role of data and algorithms in their terms and conditions, especially on how these systems determine work allocation, penalties, or performance evaluations (Fairwork, 2025b). Similarly, platforms reserve the right to unilaterally change these terms and do not provide evidence on effective safeguards to prevent their systems from systematically disadvantaging workers, either because of gender, working hours, ratings, location, or other characteristics (Ibid.).

When dealing with the question of algorithmic transparency, some organisations have noted that an initial hurdle is the definition of 'transparency' itself, with companies questioning what type of information they are demanding and pointing to the interconnections among their different services and data privacy obligations (CSO representative, 19/03/2026; 12/03/2026). This type of response reflects the multifaceted nature of transparency as a concept (Mason, 2020), which, without a clear common understanding, demands for algorithmic transparency can be easily deflected.

To challenge companies' opacity, some unions have begun researching potential data sources to understand how algorithms work. Although this exercise provides an approximation, algorithms' calculations can change, which puts unions at a constant disadvantage. An expert explains how these calculations are being addressed with the support of the government:

Other work is done by (UNION) on how the algorithm is doing the calculations of income, rewards, and other calculations, the waiting hours, OSH, the maintenance, and other costs for the motorcycle. But this is complex; more work needs to be done. (UNION) is engaging with the government on this issue, not directly pushing the platform. (Researcher, 31/03/2026)

Solving this severe information asymmetry is a priority among some unions. As one interview put it plainly:

As long as unions do not understand the algorithm, effective representation will remain impossible (CSO representative, 12/03/2026).

In response to these challenges, participants in the study proposed several concrete ideas. They urged the ILO to formulate a clear definition of algorithm transparency in platform work. Additionally, they suggested establishing a tripartite advisory body comprising workers, companies, and government representatives to review algorithmic data and oversee the implementation of any agreed standards (CSO representative, 12/03/2026; 19/03/2026). However, the latter would entail worker organisations having access to technical expertise and training to interpret data and avoid companies undermining monitoring through data dumping (Ibid.).

6.7 Worker representation

Platform workers in Indonesia have not remained apathetic in the face of deteriorating conditions, with a diverse and growing ecosystem of worker organisations having emerged over the last decade. Fairwork (2025) identifies three broad types of organisations. First, neighbourhood-based communities, which are typically small, informal groups of up to 20 drivers who share resting spots, information, and provide mutual support. These groups have developed a local identity, often expressed through logos and insignias, and are known for organising through WhatsApp groups and apps like Zello, using technology to counter the atomisation tendencies that platform work produces (Fairwork, 2025b; Frey, 2020; Putri et al., 2023).

The second type comprises more structured organisations with legal registration and explicit political agendas, some of which have up to 15,000 members (Fairwork, 2025b). Finally, there are trade unions. Both mass organisations and unions are characterised by differing positions on their legal and occupational status, with some advocating for full employee recognition, while others prioritise more immediate concerns, such as fare levels and fighting commission cuts, and remain partners rather than formal employees (Fairwork, 2025b) (Researcher, 31/03/2026).

Differences in their proximity to companies also differ among worker organisations. Companies like Gojek, Grab, and Maxim have acknowledged some national associations and informal groups (Putri et al., 2023). Companies have also engaged with some internal drivers' communities, however, these interactions usually serve to communicate policy challenges rather than to negotiate meaningful changes (Fairwork, 2025b). As a result, these initiatives are sometimes considered as more of a corporate social responsibility (CSR) initiative, than a genuine effort from platforms to engage in direct debate with workers. A participant explains,

(Companies) gather some workers, they make a workers community that are under their wings (...) talking to them, their opinion will be more positive towards the platform because they are closer to the platform (...) Their position is like a CSR recipient so they have a monthly gathering and sometimes they have an event where they are invited to join but these communities are not open to everyone. (They are open) only for those workers who have high ratings (...) (Researcher, 31/03/2026).

Another issue is that sub-sectors like drivers prefer to develop their own unions, independently, rather than participate in established trade union organisations. Reasons behind this decision include drivers' perception that unions lack specific knowledge of platform work, and that traditional negotiation methods from other sectors are not necessarily relevant when dealing with algorithms and consumer ratings rather than a human manager (CSO representative, 12/03/2026; 19/03/2026). Platform workers' unions have been very effective in organising strikes, with at least 27 strikes organised across 16 cities between 2023 and 2025 (Fairwork, 2025b). However, there is no systematic impact, especially, regarding algorithmic transparency.

It is not really a competitive relationship between (UNION) and the platform drivers' union. They are not enemies, but they are not friends either. Sometimes they do get together for certain demands, other times they operate separately (CSO representative, 12/03/2026).

Collective action and rally can be relevant in the short term (...) The main problem is that as long as we don't have the information on the algorithms, these companies will always find a way to keep their profits; they make new experiments almost every day, new bonus system, etc., always to keep the profit. After the pressure action finishes, small things improve, but then the algorithm changes again, and we're back to zero. It's a real black box (Ibid.).

At an individual level, workers have tried to push back towards the deteriorating conditions in platform work, including working directly with some of the customers (e.g., restaurants) to avoid paying a fee to platforms, or using 'ghost accounts' with fake GPS location information to work with multiple platforms at the same time (Fairwork, 2023a). However, as long as there is no regulation to strategically protect workers and their opportunities for income generation in platform work, these strategies will be insufficient to outsmart platforms' evolving management systems (Researcher, 31/03/2026).

7 BURKINA FASO

7.1 Platform landscape

With a population of 24 million, Burkina Faso has a high rate of informal employment, with 93.5% of jobs in the informal sector. Additionally, 34.6% of the population lives below the USD 3.00 daily poverty line (World Bank, 2026a). Job insecurity mainly affects young people, as nearly two-thirds of the population is under 25. Yet the latest Afrobarometer survey shows that 92% of Burkinabé aged 18-35 are unemployed, and 52% are seeking work, even though a larger share of this group (36%) has secondary or post-secondary education compared with older cohorts (4-17%) (Quansah, 2025). With many young people seeking to enter the workforce, digital platforms offer a compelling option in the country.

The irruption of digital platforms is a common trend across both English- and French-speaking countries in Africa (Anwar & Graham, 2021; Vanderpuye, 2023). Although less researched than other regions, platform work in Africa has received local hype and important corporate backing, driven by narratives of an ICT revolution that offers young people ‘a low-barrier-to-entry opportunity to earn an income, while building their skills and digital work experience’ (Anwar & Graham, 2021, p. 240).

Compared to other case studies in this report, the adoption of digital platforms occurred later, with Okalm launching in 2022, followed by Rapido in 2024, GoChap and Letsgo in 2025 - both recent introductions. In contrast to regional examples such as Ghana, Côte d’Ivoire, and Nigeria, the Burkinabe platform market consists mainly of French and domestic initiatives, as major players like Uber, Bolt, Yango, InDrive, Glovo, and Heetch have not yet entered (Vanderpuye, 2023). Consistent with broader regional trends, local platforms have quickly attracted young workers. For instance, Okalm initially estimated that 70% of its drivers were students using platform work as a source of income while studying (LE FASO 2022) (Ibrahim et al., 2024). However, this trend is rapidly changing, with some participants noting that workers are becoming more reliant on platform work as their primary source of income (Company representative, 09/04/2026; Public servant, 06/04/2026).

7.2 Main issues affecting working conditions

Although a nascent sector, platform workers in Burkina are beginning to experience similar trends seen across the region:

Invisibility of platform workers in legal frameworks

In its current version, the Labour Code, the main instrument that governs labour relations in the country, does not refer to digital platforms nor there is a specific legislation for this sector. This legal gap contributes to lack of clear guidelines on the control mechanisms that platforms can or should enforce on workers, and vice versa (Company representative, 09/04/2026). This prevents workers from claiming minimum labour rights and accessing means of conflict resolution when

algorithm-based management fails to ensure safety. A participant mentions that, in the region, companies are currently exploiting this legal gap to avoid legal liability,

(T)here is no mechanism of management, for example, for conflicts. When there is a conflict, the employer is disabled and it's over (...) As there is no work contract, when there is a problem, (workers) come, (companies) deactivate. There are even serious situations where a worker is assaulted. When the worker makes the statement that he was attacked during his work, instead of trying to protect him, (the company) disables him so that he does not say the name of the company, so that we do not say that he is a worker from (COMPANY 1) or a worker from (COMPANY 2) who has been assaulted. (Companies) don't want their name to be mentioned in the case. So they prefer to deactivate the worker and leave him with his problems (Trade union representative1, 22/04/2026).

Commission rates and income insecurity

Without legal protections, companies may exploit workers by requiring them to work overtime without proper compensation. This problem is evident in countries such as Ghana, where platform workers' earnings have fallen due to inflation, rising fuel prices, and higher living costs (Vanderpuye, 2023). To counteract this problem, researchers have advised for labour legislation to calculate minimum wages for platform workers, including direct and indirect work hours, such as waiting or travel time, and ensure a living wage after deducting work-related expenses (Ibid.). Other recommendations include imposing a single tax system to cover social security contributions (Company representative, 09/04/2026). Currently, even when platforms present themselves as business partners, workers cannot secure a living wage or negotiate the fee they are willing to pay, placing them at a severe disadvantage that is portrayed as a voluntary and individual decision.

(T)here is a form of exploitation because you pay for your vehicle, you put your fuel, you take care of the maintenance of the vehicle, simply because you use a platform. The one that gives you the platform sets the fees without discussing it with you. You can't say if the fee is 20% or 30%; there is no way to discuss. If you agree, you take it. If you don't, you leave (Trade union representative1, 22/04/2026).

Countries such as Kenya are already implementing measures to regulate the maximum commissions platforms can charge workers, setting a cap of 18% for all digital labour platforms (Vanderpuye, 2023).

Loans and subcontracts

Unlike the other case studies, loan services are currently unavailable to workers in Burkina Faso. However, there are initiatives aimed at increasing workers' access to digital payments, a preliminary step towards including them in digital financial tools. An example of this is the 2025 agreement between Okalm and Orange Money to support digital payments for rides (Sanou, 2025).

Progressive financial inclusion through digital platform work can be a double-edged sword. On one hand, it may eventually help workers access credit services to buy their own vehicles, establish themselves in the platform economy, and avoid exploitative sub-contracting practices. While the authors couldn't verify the presence of subcontracting in Burkina Faso, in Ghana, it is noted as a major concern, with 'work-and-pay' and 'sales or rentals' agreements between drivers and vehicle owners (Vanderpuye, 2023). Under these arrangements, vehicle owners often charge workers

twice the vehicle's cost before granting ownership and enforce exploitative working conditions, in which drivers are entitled to only one day's earnings from six working days (Ibid.). On the other hand, in Francophone countries like Benin, the company Gozem has reportedly been providing loans (Lee, 2022), but vehicle owners may push for additional requirements.

We try to convince the workers themselves to realise that they are in a process where they are exploited even when they are giving you a loan to buy the car (...). We have seen people dying in their cars because of a lot of work. They are working almost 20 hours a day because they need to apply to the requirement of the employer. (The employer) can tell you that you have to make this amount or the number of hours you have to work per day even if you are sick. The car should not stop. So we are seeing many, many issues around it. Even if the car is given by the employer, they are still exploiting the workers because of the requirements, with no provision of social protection, no sick leave, nothing. So this is what we have in the region now (Trade union representative1, 22/04/2026).

Traditional unions and state actors are unprepared for upcoming challenges

Although platform work is a relatively new phenomenon, it is rapidly expanding in Francophone countries like Burkina Faso, often outpacing the ability of national authorities and unions to respond. Some participants highlighted the lack of clarity on how to monitor or regulate the activities of these companies (Company representative, 09/04/2026; Platform promoter, 09/04/2026). Additionally, many workers are unaware of their labour status (Public servant, 06/04/2026), the rights available or not under the current labour law (Researcher, 15/04/2026), and their capacity for collective bargaining. To strengthen unions and associations, there is an urgent need to raise awareness among various actors, especially workers, about the nature of their employment relationship with platform companies.

The worker has little power to negotiate working conditions. The absence of a specific collective agreement in the sector does not facilitate cooperation between the parties (Company representative, 09/04/2026).

That's why we pushed and convinced the workers, because the workers themselves do not consider themselves as workers. Because at the beginning, they said it was a business partnership, so they did not consider themselves as workers. And it is with awareness that the workers first became aware that they themselves are exploited. And then we went to the authorities to say, that in fact, in this business, there is a form of exploitation. We must establish the order between the one who exploits and the one who is exploited to be able to define the rights according to the national law and the international law (...) (Trade union representative1, 22/04/2026).

It is necessary to train labour inspectors so that they understand these new operating models. It is also necessary to strengthen the administrative capacities of the relevant institutions and to raise awareness among platform workers so that they are fully aware of their social and professional rights (Researcher, 15/04/2026).

7.3 Policy debates

In Burkina Faso, the prevailing view today tends to prioritise digital platforms as technological intermediaries rather than employees, without explicit recognition of a relationship of subordination that could form the basis of an employment relationship (Trade union representative1, 22/04/2026). This position is reinforced by two factors: a desire to encourage digital innovation without imposing overly onerous constraints on companies, and a low level of legal disputes compared with other countries in the region (Vanderpuye, 2023)(Vanderpuye, 2023). These result in systems that currently bear no accountability for working conditions, health and safety, working hours, or workers' pensions (Trade union representative1, 22/04/2026).

Burkina Faso's Labour Code was designed for traditional employment relationships and does not specifically recognise platform workers. Thus, they are generally classified as self-employed, which disqualifies them from mandatory social protection coverage (Company representative, 09/04/2026). This situation is further complicated by what one specialist described as a 'dual status', in which platform workers oscillate between self-employment and a condition resembling employment, depending on their economic circumstances, thereby making legal classification difficult (Researcher, 15/04/2026). The absence of a fixed workplace complicates matters, raising questions about whether accidents can be recognised for workers who have no defined point of departure for work (Ibid.).

The broader African context provides examples of both the possibilities and the fragility of legal ambiguity in Burkina Faso. In Ghana, although the existing law does not protect platform workers, courts have developed a multi-factor test to determine employment status based on the degree of control exercised by platforms, economic dependence, and payment method (Vanderpuye, 2023). In Kenya, the High Court issued a landmark 2022 ruling requiring Uber to resolve driver disputes through arbitration in Kenya rather than the Netherlands (Ibrahim et al., 2024). In 2017, the Labour Court in South Africa ruled that Uber drivers were indeed workers. However, a year later, this decision was overturned because the court could not determine the workers' employment relationship with Uber's headquarters (Ibid.). As these examples illustrate, regulatory gains may be won but remain vulnerable to reversals.

In Benin, platforms have been systematically discouraging collective organising, framing the work relationship as a business partnership. For instance, Gozem drivers who sought to organise were told by the company that *'those who do not want the conditions (...) can leave. Those who want to continue do not have the possibility to get together to claim something'*, since each worker signed an individual contract (Trade union representative1, 22/04/2026). It was through sustained union pressure and the Ministry of Labour's engagement that a moto-taxi union finally achieved recognition (Ibid.).

What would an adequate reform in Burkina Faso look like? Interviewees mainly converge on the centrality of certain elements: a legal definition that introduces the concepts of economic dependence and algorithmic subordination as determinants of the work relationship; the need to create an intermediate status between employee and self-employed that captures the ambiguous reality of platform work, establishing mechanisms for monitoring platform practices, demand transparency around algorithms and terms of use, and developing flexible protection mechanisms that adapt to irregular earnings and growing mobile payments.

7.4 Rights coverage and social protection

In theory, platform workers have a few options for social protection in Burkina Faso. The National Social Security Fund (CNSS) offers voluntary enrolment for self-employed workers, covering occupational risks, pensions, disability, death benefits, and family and maternity allowances, as well as for casual and daily workers if they hold an employment contract.²⁹ Workers' Health Office (OST) services are, in principle, available, though they require some conditions that presuppose a formal employment relationship, such as employer registration and the workers' attendance at medical examinations (Platform promotor, 09/04/2026). Since 2023, the Universal Health Insurance Scheme (RAMU) has been progressively rolled out. This scheme was expected to cover at least 15% of the population by 2026, including informal workers and foreign residents.³⁰ Community health mutuals and private insurance products also exist as supplementary options (Company representative, 09/04/2026).

In practice, however, access to and use of these protections remain limited. Rational short-term calculus often restrains platform workers from voluntary enrolment in the CNSS. As one interviewee noted, *'workers, who need immediate cash, do not see the point of contributing towards future (pension) or uncertain (sickness) protection'* (Public servant, 06/04/2026). In case of emergencies, workers tend to fall back on informal forms of solidarity, including tontines (community pool funding), community giving, and family support networks, that are based on cultural practices of reciprocal giving due to the lack of access to institutional arrangements (Researcher, 15/04/2026). However, they remain supplementary forms of protection and do not provide a sustainable solution in the case of serious illness, accident, or old age.

The social protection gap for platform workers is not unique to Burkina Faso, nor to the platform sector. Moreover, there is no significant evidence that platform companies are taking action on this issue. A similar tendency is noted in other African countries. In Ghana, Fairwork found that in 2022, only one of the ten platforms assessed provided evidence of taking action to protect workers from on-the-job risks, and no platform could demonstrate that it provided a safety net for those unable to work. The situation had deteriorated from the previous year, when at least one platform had offered some compensation for incapacity (Vanderpuye, 2023)(Vanderpuye, 2023). A representative of an organisation stated,

For the moment, in some countries, there are social protection systems that are organised by NGOs or unions that exist in parallel, where workers can voluntarily join a social protection system. Otherwise, in Africa, not only in French-speaking Africa, because I also work in English-speaking countries, for the moment, there is no country where the employer is involved in the social protection of platform workers. It is a great challenge to raise (Trade union representative1, 22/04/2026).

Besides the inaction from platform companies to secure social protection for workers, there is also the issue of the type of coverage workers could be entitled to. In anglophone countries, platform work has often emerged as supplementary income for people already employed and therefore already have access to some form of social protection through their primary job. In francophone countries, by contrast, where platform work is rapidly becoming workers' main source of income,

²⁹ <https://cnssbf.org/?p=1682>

³⁰ <https://www.ilo.org/resource/news/universal-health-insurance-scheme-ramu-being-set-burkina-faso>

workers require full social protection from platform companies (CSO representative 1, 22/04/2026). Thus, any future legislation must consider accumulated entitlements to social protection for those workers seeking flexible time arrangements or multi-applying.

Finally, although interviewees stressed the existence and importance of voluntary enrolment mechanisms already available in Burkina Faso, given the state's current limitations in securing universal health protection and other forms of protection for all workers, these mechanisms are insufficient without a binding instrument.

The reform of universal health insurance, along with voluntary enrolment schemes, are key levers for better addressing the needs of digital platform workers. However, to ensure effective and sustainable social protection, these measures must be accompanied by a binding legal framework for platforms (Researcher, 15/04/2026).

7.5 Anti-discrimination measures

In Burkina Faso, women's participation in platform work is perceived by some participants as constrained and largely unprotected (Company representative, 09/04/2026; Public servant, 06/04/2026; Researcher, 15/04/2026). Although ride-hailing and delivery sectors remain overwhelmingly male, women are becoming more visible (Company representative, 09/04/2026). Still, across the region and internationally, discussions about the presence of women and other vulnerable populations in platform work, and about how to protect their rights, are perceived as peripheral. A representative of a civil society organisation highlights how these groups are affected by the same old patterns of discrimination in the traditional labour market:

They are silent, and they are not taken into account from the start (...) We have seen that these forms of work are marked by old injustices, especially towards women. And unfortunately, even the convention, the work that is done at the ILO level, does not come out, does not put us in the (debate) (...) Here in (COUNTRY), we have women today who are on the platforms of transport. There are women who work, but their rights are eroded, their protections are eroded. And so the model of capitalist, neoliberal and patriarchal platforms continues to be put in place (...). These people are twice marginalised. They are twice victims of discrimination (Trade union representative2, 22/04/2026).

Participants in Burkina Faso observed that women encounter more material barriers to platform work, including limited access to vehicles, smartphones, and internet connectivity (Company representative, 09/04/2026). Social norms restrict their participation in the workforce because they are expected to take on more domestic responsibilities, limiting their availability to engage with the platform. Additionally, women face specific risks not addressed by current governance structures, such as customer harassment and abuse, along with a lack of effective reporting mechanisms (Public servant, 06/04/2026; Researcher, 15/04/2026). To address these issues, one participant highlighted the value of applying a feminist perspective to platform work, advocating for alternative models led by women and vulnerable groups that offer tailored protections for them. However, incorporating a feminist perspective can be an uphill battle, especially since it comes after a significant debate: recognising platform work, in its current form, as informal labour.

With a feminist digital justice perspective, where civil society, unions, work to regain control of data on platforms. We need to see how we can rewrite the work of care, the work of service, the work of women, young people, workers, migrants in this economy (...). With digitalisation, all humanisation is disappearing. How can we make sure that these people enjoy their rights, that we can recognise their rights, in line with work, like the freedom of association, the right to organise, to negotiate collectively, and to have an equal salary with zero tolerance? (Trade union representative2, 22/04/2026).

Many are not really concerned with the issue of equality and dignity, and the right to well-being, specifically (for) women (...)we created neologisms to (refer to) the realities of the informal economy, which is an informal economy that does not say its name. So the economy of platforms is an informal economy (Ibid.).

7.6 Algorithmic transparency

The rules governing how platforms operate in Burkina Faso are perceived as 'opaque by design' (Company representative, 09/04/2026), failing to provide information about how task allocation, rankings, and account suspensions are determined, thereby directly affecting workers' livelihoods. As a participant recognised, commission rates can change overnight without consultation or explanation: *'From one day to another, they are changing the commissions without consulting the drivers and the riders. (Companies) are just deciding, today is 12 (per cent), (then) they take it to 15 (per cent) without any explanation'* (Trade union representative1, 22/04/2026). Under the current (lack of specific) legislation, there is no obligation to inform workers in advance of changes or to engage in social dialogue to discuss how algorithmic decisions are made.

In this sense, transparency is proposed as essential for any regulatory process for platform work (Company representative, 09/04/2026, Public servant, 06/04/2026, Trade union representative 1, 22/04/2026). Currently, organisations and trade unions lack a formal mechanism to enforce dialogue on this and other topics. Consequently, the upcoming ILO convention on platform work and other international discussion forums should include algorithmic transparency as a core element of social dialogue. This does not require companies to disclose technical details, as workers often lack the capacity to analyse them beyond understanding their impacts.

For now, at a local level we don't have capacity to go through the algorithm. But it's the effect of the algorithm we are feeling, and we are asking for transparency. Not going deep in the algorithm, because we don't have capacity, technically (...) If we have a solution at international level, we can go on this basis and come back to regional and national level (Trade union representative1, 22/04/2026).

7.7 Worker representation

The absence of collective action is both a cause and consequence of platform workers' vulnerability in Burkina Faso and other countries in the region. Without a framework that allows their representation, workers cannot negotiate the terms of their work, leading them to other forms of protests that expose them to potential deactivations (Anwar & Graham, 2021). At the same time,

the features that distinguish platform work (absence of a shared workplace, flexibility in hours) make it difficult to organise the workforce (Researcher, 15/04/2026).

Across the African platform economy, workers are attempting to organise around the sector. In Nigeria, the Amalgamated Union of App-based Transporters of Nigeria has been established, while in Uganda, there is an all-female riders' association (Anwar & Graham, 2021). In the case of Ghana, there are already 20 ride-hailing trade unions, with 16 affiliated to wider national organisations (Vanderpuye, 2023). A participant noted that workers' organisations are less advanced in francophone countries, but efforts to bridge this gap are growing in Benin, Senegal, Togo, Cameroon, Côte d'Ivoire, and Burkina Faso (CSO representative 1, 22/04/2026). For instance, in Côte d'Ivoire, the union of *Coursiers et Livreurs* has already met with government representatives to discuss the recognition of delivery workers' rights (Ibid.).

Curiously, at a regional level, there is a tendency for local platform companies to be more open to social dialogue with platforms like Little Ride and Yego (Kenya), and Black Ride (Ghana), recognising the freedom of association of workers (Anwar & Graham, 2021; Ibrahim et al., 2024). Black Ride in Ghana even provides workers the possibility of a fair hearing prior to any account deactivation, a basic procedural protection that multinational companies like Uber and Yango do not provide (Vanderpuye, 2023). This distinction between local and multinational companies is worth noting for future research on Burkina Faso, where domestic platforms dominate the market.

According to Law No° 64-2015/CNT, freedom of association has been officially recognised in Burkina Faso for over a decade, but its application has not been tested for platform workers. Regional organisations have struggled to organise workers in Francophone countries due to different reasons: trade unions currently facing political backlash, self-recognition of workers as business partners, tensions between established unions (e.g., drivers) and the fleeing of their members to platform work (Trade union representative1, 22/04/2026).

People don't want to go to the unions right away because they don't want to hear about unions anymore. When we start talking about unions, everyone runs away (...) So there is a work of capacity strengthening that the social movement must do with the union to allow these people to know their rights, their duties, everything that is social protection and risk of their profession (Trade union representative2, 22/04/2026).

In addition to the need for a legal framework that classifies workers and recognises their freedom of association, the study's participants highlighted the need for sectoral unions to treat platform work as a cross-cutting phenomenon that will affect their existing structures (Ibid.). Moreover, workers' associations need training on labour rights and social protection mechanisms for their work status, familiarise themselves with international experiences on social protection for platform workers and innovative forms of representation and dialogue via digital communities, as well as how to coordinate advocacy with wider organisations to present joint demands with public authorities (Company representative, 09/04/2026, Public servant, 06/04/2026; Researcher, 15/04/2026).

PART 3 COMMON TRENDS AND RECOMMENDATIONS

8 CROSS-CUTTING FINDINGS

The analysis of regulations and literature on digital labour platforms in LMICs, alongside the Fairwork dataset and detailed case studies of Brazil, Peru, Indonesia, and Burkina Faso, highlights the increasing significance of the platform economy in LMICs' labour markets. While their adoption varies - Latin America and Asia saw a surge in the mid-2010s, and some Francophone African countries have recently experienced growth - these platforms often start as supplementary sources of income. Over time, workers become more economically dependent on them, driven by COVID-19 and ongoing global economic and political crises that have slowed economic recovery. In the current context of polycrises, digital labour platforms have rapidly positioned themselves as an important lifeline for workers in general, but especially for the youth, women, LGBTQ+ populations, and migrants who, faced with poor job demand, are finding in digital labour platforms a rapid solution to improve their earning potential, even at the expense of longer hours of work and other decent work deficits.

The rise of digital labour platforms has driven a wave of legislation in LMICs, particularly in Latin America, where four countries have recently developed their own legal frameworks. These vary in terms of recognised sectors, recognition of independent workers, social protection, and freedom of association. Similar developments have occurred in other LMICs in Asia and Africa, although at a slower pace than the market share of consumers and users these regions offer platform companies.

These experiences demonstrate that, even if regulation does not explicitly acknowledge a labour relationship between workers and platform companies or recognise autonomous work, some minimum rights can still be legally covered for platform workers. These include minimum wage (such as in Malaysia), algorithmic transparency, and social protection. A comparative analysis of eight legal frameworks revealed that some LMICs are experimenting with various social protection approaches that differ in scope. Notably, countries that recognise a labour relationship - such as Chile, Mexico, and Uruguay - tend to offer more comprehensive coverage. Furthermore, there are different ways to promote social protection, including direct discounts to workers (Mexico, Malaysia), direct payments from workers (Chile, Uruguay, and Argentina), government coverage (India), and shared contributions between workers and governments (Malaysia and Singapore). The preference for contributory systems appears to be influenced by a mix of factors, including the cost of extending protection to a considerable share of the workforce, the prior existence of alternative tax systems such as the Monotax in Uruguay, and the recognition of platform companies as employers. However, the data-collection and analysis methods used in this study do not allow us to generalise these tendencies.

Another limitation of this study concerns the analysis on how these frameworks are implemented. Having a law in place does not necessarily mean there is greater formality. As participants mentioned in the case of Indonesia, clear guidelines are essential for effective implementation and monitoring of legislation. Addressing this gap is important for future research on digital labour platforms in LMICs.

The vulnerability of more formal approaches in digital platform work also affect private efforts to defend workers. The four case studies highlight various measures implemented by platform companies in these countries. For instance, in Peru, hail-driving apps are seen to have helped standardise transport services, especially since the deterioration of public transport due to a sector reform in the 1990s. This impact is reflected in legislative proposals, including a leading bill that would establish a national workers' registry, enabling both national and local governments to access information about this workforce.

In Brazil, companies have implemented accident insurance for workers during their services, offer bonuses for pregnancy, have established rest areas, and also cover some essential equipment expenses. In Burkina Faso and Peru, partnerships with digital tools and payment modes provide an opportunity to enhance financial inclusion for workers in large informal economies. Moreover, in Brazil and Peru, companies have established programs against harassment of women, although in Peru, they seem more geared towards consumer protection than towards workers. Another notable example was the initiative by Gojek and Grab to cover social protection premiums for their workers in Indonesia.

These initiatives represent a promising step towards improved worker protection and the gradual formalisation of labour. However, they present two major challenges. First, there is the issue of discrimination. In Indonesia, for example, the increasing reliance on worker rankings and stratification through special programs undermines the implementation of these initiatives. One participant noted that access to social protection is often tied to a worker's ranking, reinforcing discriminatory practices within the platform economy. Instead of advancing sector-wide rights, this approach creates a second-tier category of workers.

Second, in Brazil, Peru, and Indonesia, such initiatives have been described as mechanisms for workers' enrolment in platforms. These efforts often operate within competitive dynamics that ultimately threaten the sustainability of the initiatives; once platforms successfully attract workers, there is a tendency to phase out these programs. Therefore, it is crucial that these initiatives are anchored in legally binding obligations to guarantee workers' rights and protections.

Based on the five dimensions proposed in the analytical framework, the following issues stand out in our analysis of the case studies and other legislation progress:

[Legal recognition of work relationship](#)

The ongoing debate over the legal recognition of work relationships between workers and platform companies highlights three key areas that legal frameworks need to address to prevent the replication of exclusionary practices within the platform ecosystem. The first area concerns the explicit recognition of workers' subordination within these relationships. Worldwide, platform companies often position themselves as intermediaries, sometimes exploiting existing laws to reinforce this stance. A notable example is Indonesia, where hail-driving apps classify workers as 'mitra' (partners), taking advantage of the existing framework for SMNEs. However, when drivers are responsible for vehicle maintenance and operating costs, pay for premium access to job orders, are affiliated with social protection, and lack opportunities for negotiation, their position in the partnership becomes unfavourable. Similarly, in Brazil, participants cited cases of 'fake' autonomy, in which digital labour platforms and other companies exploited the labour reform introduced in 2017 to subcontract workers while retaining control over them. In digital labour platforms, workers' subordination manifests in companies' influence over their decision-making

about how to carry out their work. Through incentives, premiums, and gamification tactics, platforms push workers to accept job offers, spend more time on the platform, and complete services. Choosing not to do so does not mean losing earning opportunities in the moment, but it exposes them to future punishments, such as deactivation or the algorithm not assigning them enough orders or job offers. Although workers are, free to leave or switch platforms, in practice, this is not an option, especially as platform work becomes an increasingly mainstream source of income. Moreover, as noted by participants in Peru for drivers and domestic workers, platforms also impose standards that service workers must follow, which contradicts the principle of partnership as those who provide the services do not have a say in these standards.

One of the most harmful forms of subordination involves the increase in loans and rental agreements between companies and workers, as reported in Brazil, Indonesia, and Benin. By developing in-house financial services, platforms are creating ecosystems that make workers dependent, as they can only access essential infrastructure and supplies through the platform itself. Participants in Brazil described this as a way to ‘trap’ workers, warning of a growing form of modern slavery in the sector.

In countries such as Ghana, Kenya, and South Africa, where regulations are lacking, courts have developed their own criteria to determine subordination and employment status (Ibrahim et al., 2024)(Ibrahim et al., 2024). Nevertheless, if these criteria are not clearly established by law, there is a risk that courts’ decisions may be ignored.

A second concern involves which type of workers should legal frameworks recognise. This study shows that workers on digital platforms are diverse, creating tension within and between workers’ associations. In Indonesia, Brazil, and Peru, workers tend to split based on service type (hailing or delivery) and migratory status (foreign or local), with some demanding full employment rights while others prefer to remain autonomous or independent. In Argentina, all workers are considered independent but lack rights related to freedom of association. Meanwhile, Chile, Uruguay, and Mexico have adopted frameworks that accommodate both situations, granting extensive rights, including the right to organise. These examples demonstrate that recognising independence does not mean stripping workers of all rights, and even independent workers can be granted freedom of association.

A third issue concerns the type of services or sectors covered by regulations. In this study, discussions about workers’ rights mainly focus on drivers and delivery workers, even though other location-based services, especially domestic work, are expanding. To protect these emerging worker groups, regulations need to extend beyond transport and mobility. For instance, Mexico’s approach recognises any job requiring physical presence. As online work (e.g., online teaching in Brazil) becomes more prevalent, it is crucial for debates on platform work to consider whether online platform workers should be classified as a subcategory of digital labour platforms or require specific regulatory protections.

Recognising a work relationship should also address key worker concerns, such as ensuring a minimum wage. In Brazil and Indonesia, dissatisfaction with declining earnings has led to protests, and deteriorating income prospects have prompted longer working hours and increased pressure to complete more services. Examining regulatory frameworks in LMICs, the cases of Argentina, Chile, and Uruguay offer insights into possible protections for workers’ income. These include prohibiting discounts on gratuities, tips, and awards; tying payment per piece or hour to the

country's minimum monthly wage; and banning wage reductions due to inherent service risks (see Annex 2).

Recommendations regarding the legal recognition of the work relationship

- Legal frameworks should clearly define subordination conditions to establish a work relationship between workers and platform companies.
- There is a tendency among platform workers to demand the recognition of independent, part-time, and autonomous workers. Depending on the context, regulations could recognise alternative worker categories without reducing their access to rights.
- Regulations should encompass any service delivered through platform intermediation that requires the worker's physical presence.
- To enable national courts to intervene in disputes, companies must have legal representation within the territory where workers are based to operate legally.
- Banning forms that can engage workers in further subordination beyond the work relationship, especially credit loans that are automatically deducted from workers' earnings.
- Platform regulations should be incorporated into the national labour code rather than being isolated in specific sectors (e.g., transport).
- Legislation should ensure that payment calculations are based on the minimum wage, with the aim of moving towards a living wage.
- Companies must not apply discounts over tips and awards provided to workers.
- Companies should not reduce worker pay to cover costs arising from inherent service risks, such as accidents.
- Countries should specify, assign and/or adopt adequate systems and/or institutions to monitor platform companies' adherence to a set regulatory framework, providing workers the opportunity for information sharing and dialogue about the monitoring of their activities.

Social protection

The four case studies, especially Burkina Faso and Peru, highlight countries where informality dominates the labour market. While significant progress has been made toward universal health coverage, access to other protections, such as pensions, disability benefits, and maternity leave, remains limited to a small, privileged segment within traditional employment. In all four cases, national laws permit voluntary contributions from independent workers. However, these schemes are often underfunded due to two primary issues: income reductions among workers, notably in Indonesia and Brazil, and distrust in the government's or other actors' ability to manage these services, as seen most starkly in Peru. Consequently, workers are perceived as unwilling to allocate part of their decreasing incomes to social protection.

In Brazil and Indonesia, firms like iFood and Gojek have established accident insurance programs. Gojek, in particular, has partnered with BPJS, Indonesia's national social security system, to support workers' social security. Yet, participation in Gojek's scheme depends on workers' rankings, making it a privilege rather than a mandatory policy.

Addressing how to ensure social protection for platform workers in informal settings, Indonesia's example of providing basic protections - such as death and accident insurance - is a starting point, however still far beyond what can be considered a social protection floor. This approach can be an entry point towards a more comprehensive coverage for platforms offering high-risk services, such as driving and delivery. Such measures could be combined with mixed arrangements, especially

those that favour applying a discount to workers, like in the cases of Mexico and Malaysia. However, in highly informal contexts with low trust in social protection systems, it is essential to consider mixed arrangements that include government contributions, particularly to target the most vulnerable workers.

Recommendations regarding social protection

- Avoid reducing social protection to a voluntary arrangement for independent workers. For these workers, mixed arrangements that combine contributions from companies, workers, and governments could provide more flexible ways to ensure minimum protection. In these cases, companies could oversee workers' affiliation to secure their enrolment in social protection systems.
- Regulatory frameworks should require complete social protection for workers whose hours align with full-time employment as defined by the national labour code, granting them the same benefits as full-time employees under traditional labour arrangements.
- Regulatory frameworks must address the condition of multi-applying. For these cases, mixed arrangements proportional to the hours of work in each platform could be applicable.

Anti-discrimination measures

Anti-discrimination measures were either absent or insufficient across all four contexts. The study highlighted three main forms of discrimination. The most prominent is discrimination against women workers. In all four countries, there is increasing recognition of women's presence in platform work and their exposure to various risks compared to male workers: sexual harassment from clients and peers, exclusion from digital organising spaces, lack of maternity leave, and inadequate rest facilities in cities. For example, in Brazil, women delivery workers face algorithmic penalties for safety precautions, such as refusing to enter private spaces. In Indonesia, female drivers receive fewer ride allocations because male customers cancel once they discover the driver is a woman. Yet, no platform has implemented algorithms to correct this bias.

Additionally, the growth of domestic work platforms is weakening established regulatory protections for domestic workers. In Peru and Brazil, despite existing regulations, platforms acting as intermediaries have circumvented them. However, these sectors are usually not included in current platform regulation debates, which mainly focus on drivers and delivery workers.

A second form of discrimination targets migrant workers. In Peru, Venezuelan migrants make up most delivery workers, yet they are legally prevented from gaining employee status due to nationality quotas set by the current Labour Code. Discrimination against these workers is evident in the lack of interest from workers' organisations and politicians to regulate platform work, as they belong to a minority and are increasingly affected by xenophobia. In countries like Singapore and Malaysia, the study found that platform regulations explicitly exclude migrants without citizenship, although these groups often favour platform work, especially in high-income nations (Realising Decent Work in the Platform Economy, 2024)(Realising Decent Work in the Platform Economy, 2024).

A less visible but significant form of discrimination involves rankings and stratification, as observed in Indonesia. The introduction of premium-payment options, granting privileged access to benefits and job offers, has created status tiers among workers. This stratification results in selective groups favoured by companies' CSR initiatives, further stratifying the platform workforce.

The absence of clear measures to prevent and report discrimination disproportionately harms groups that gain more from the flexible and low-entry nature of platform work: women, migrants, sexual minorities, and vulnerable populations. These groups already face challenges in fitting into the traditional labour market and often juggle multiple roles, including housework and caregiving.

Recommendations regarding anti-discrimination measures

In addition to recognising principles of equality and non-discrimination, platform regulations should explicitly include:

- Banning algorithmic and other management measures that disadvantage vulnerable groups in job offers.
- Prohibiting premium-payment options for workers to access rights, benefits, job offers, and special fares.
- Establishing formal channels for reporting discrimination, where reporting does not jeopardise job opportunities or risk deactivation.
- Implementing effective and transparent communication strategies to inform workers about prohibited discriminatory practices and reporting channels.
- Providing rest areas for vulnerable populations, proportionate to the number of workers in the area.
- Offering training on risk prevention, especially for women and vulnerable groups.
- Ensuring compensation for vulnerable workers whose safety has been compromised during service provision.
- Providing specific insurance and protection measures for pregnant women.
- Allowing maternity leave without penalisation by algorithms upon return to work.

In the case of domestic work and similar services, platform regulation should not contradict the rights established for these workers in national labour's codes or regulations, including ILO's Convention N° 189 on domestic work.

Algorithmic transparency

Alongside minimum wage and workers' status, algorithmic transparency is one of the most debated issues for platform workers in the sector. Platforms can collect large amounts of data on workers' behaviour, location, ratings, and productivity. However, workers lack information about how tasks are assigned, how pay is calculated, how penalty thresholds are set, and what criteria lead to deactivation. With the exception of Burkina Faso, algorithmic opacity has been a main driver for workers' protests. The unidirectional flow of information, again, undermines the argument of platform workers having a 'partnership' relation with companies.

In countries such as Indonesia and Burkina Faso, workers recognise a lack of knowledge about the technical mechanisms behind algorithms. They advocate for specific actions, such as clear definitions of algorithm transparency, the types of information they can access, and regulations requiring prior notice for measures affecting them. An example of best practice is Black Ride in Ghana, which offers a hearing before deactivating a worker (Ibrahim et al., 2024). Participants in Indonesia emphasised that algorithmic transparency does not need to include technical details about training or operation that are proprietary. Instead, platforms should provide workers with information to help them understand how algorithms might impact them.

Recommendations regarding algorithmic transparency

- ILO should provide an international definition of algorithmic transparency, establishing the type of information workers and governments can demand from companies. This information could be periodically revised by tripartite bodies comprising representatives from workers, the government, and the companies.
- Regulations should clearly prohibit companies from unilaterally deactivating workers without offering them a formal hearing beforehand.
- Transparency measures should also encompass details about commissions and other discounts that companies apply before workers start services, allowing sufficient notice before any change takes effect.
- National and local governments are free to decide if they want to cap commissions of platform services.
- Prohibiting the use of economic punishment, reduced job offers, or deactivation measures if workers refuse to participate in company campaigns or incentives that require extra working hours, services, or other demands.

Worker representation

The legal framework for recognising unions in most countries assumes an employment relationship, which platforms actively deny. In Brazil, workers' associations have faced difficulties in obtaining the *carta sindical* needed for legal recognition. In Peru, platform unions initially could not register through the standard process. Besides formal procedural obstacles, there is also a concern about the freedom of association for independent workers if future legislation arises. Our study shows that countries like Chile, Mexico, and Uruguay have addressed this issue by recognising the status of independent workers to grant them access to union rights, even when they hold an 'alternative' labour arrangement.

Four issues persist amid the rising trend toward worker organisation. First, platform companies tend to atomise workers due to the nature of the work, reducing opportunities for interaction. Consequently, the activity and geographic dispersion of workers hinder their ability to organise compared to traditional sectors like construction.

Second, citizens often see platform work issues as problems affecting only a select, often marginalised, group. In countries like Brazil and Peru, this leads to a lack of public support unless workers stage widespread protests. In Peru, where unions are small, finding new ways to raise sector awareness is crucial. As Brazilian participants noted, the rapid 'platformisation' of work is likely to impact other traditional sectors over time.

Third, related to the second barrier, there is a perceived lack of understanding among traditional unions about the challenges posed by platform work in today's labour market and its potential impact on other sectors. In Indonesia, participants noted tensions between drivers' unions and traditional unions. In Burkina Faso, platform work is still emerging, necessitating capacity-building for workers and organisations to understand industry developments and international trends. Therefore, there is a need for greater awareness and information sharing about workers' organisational challenges and new dialogue methods within labour organisations, especially since these modes do not rely on shared physical spaces.

Finally, with the rise of right-wing governments, countries like Brazil have been affected by wide-ranging reforms that have undermined the creation and strengthening of unions through measures such as cutting income streams. Upon this challenge, unions today are in need of technical and financial support to adapt to the challenges of new types of work like digital labour platforms.

Recommendations regarding worker representation

- Regulatory frameworks must acknowledge the right of association for dependent and independent workers, and specify communication channels for social dialogue with workers' organisations.
- Labour authorities must facilitate clear guidelines for the official registration of workers' associations on digital platforms.
- Companies should inform new workers about the existence of workers' associations that could aid them in case of disputes.

9 RECOMMENDATIONS

9.1 For trade unions

At a national level, the study evidences a challenging scenario for trade unions aiming at influencing the establishment and roll-out of public regulations for the protection of workers in digital labour platforms. On the one hand, the way in which labour is organised in platform work capitalises on individual work and the spatial dispersion of workers. This contributes to worker isolation, diminishing opportunities for interaction and sensitisation regarding working conditions, as in traditional work scenarios (e.g., factory plants). Worker isolation compounds with the entrepreneurship discourses mobilised by platform companies, on which workers are portrayed as benefiting from flexible work hours and independent work arrangements. In the current context, workers do not identify as such. This sentiment is shared by trade union representatives in Peru and Brazil, as well as by regional representatives in Latin America and Africa.

Awareness raising and capacity building at three levels

While the upcoming ILO conference is an opportunity for trade unions to negotiate an international standard for regulatory frameworks for digital platforms, their potential adoption at the national level will require workers' recognition of the value of this legal instrument for its effective implementation. As such, a common recommendation that participants highlighted is the need to sensitise on the risks of digital labour platforms and workers' rights at three levels: among platform workers, within traditional trade unions, and among consumers and citizens to support workers' demands. Moreover, incipient workers' organisations require guidance and capacity building from more traditional movements.

Adapting trade union strategies to platform workers

The familiarisation of risks associated with digital labour platforms and how platforms operate is also imperative among traditional unions. As noted by some participants, traditional trade unions are struggling to retain members and to recruit younger workers. In Indonesia, participants noted how the decrease in membership is creating tensions between traditional unions and new organisations of platform workers. Rather than treating risks in platform work as isolated, traditional trade unions must engage with and educate their members about new forms of labour organisation, including algorithmic transparency, the rights of independent workers, and new means of protest and worker mobilisation that include digital strategies for workers that do not share a common workplace or that operate online.

Strengthening South-South exchanges and learning

At a regional and international level, this study has shed light on the perceived lack of familiarity among trade unions on how workers' are dealing with regulation gaps and roll-out for platform work in neighbouring countries as well as in countries with large levels of informality. For instance, while in African and Asian settings governments and workers are pushing for the capping of commissions, this strategy was not brought up in Latin American cases. In 2025, research centres and observatories collaborating with the Fair Work project signed the [Declaration of Asunción](#) on platform work in Latin America. This declaration establishes common agreements on rights for

platform workers. Similar initiatives could be replicated among regional and international trade union networks, fomenting the sharing of information and resources (e.g., legal assistance, training) towards the monitoring of these rights.

9.2 Organisations supporting trade union work

Supporting the development of specialised technical capacity within unions

In all four cases, workers' organisations experience a significant imbalance. Companies have access to teams of lawyers and algorithm experts, while unions negotiate with only a few leaders. WSM, ACV-CSCi and the INSP!R network could help by providing affiliated unions and informal associations with technical support, such as legal advice on labour classification, economists, and specialists to analyse platform earnings and cost structures, as well as data scientists to understand algorithmic management systems. This support should also include dedicated assistance for vulnerable groups, whose members often struggle to engage in these processes.

Champion the legal recognition of workers' organisations independently of employment status

A recurring challenge for LMICs is that union recognition relies on the existence of an employment relationship. This creates a cycle in which workers cannot negotiate with platforms because of their lack of legal status, leading to increased protests and growing discontent among companies, workers, and users. WSM, ACV-CSCi, and the INSP!R network should prioritise advocating for the recognition of platform workers' associations at both national and international levels. The situation in Argentina, where recent labour reforms have actively limited freedom of association for independent workers, should be viewed as an urgent warning sign.

Invest in South-South learning and cross-sectoral networks, with particular attention to women and migrant workers

Workers' organisations in LMICs often fail to benefit from lessons learned in similar countries. Instead, they tend to draw insights from European, North American, or high-income Asian countries, which may not reflect their complex realities. WSM, ACV-CSCi and the INSP!R network are well-placed to facilitate connections among platform worker movements in the 'Global South', promoting the sharing of strategies, regulatory insights, and legal knowledge among countries with similar issues. These networking efforts should emphasise women platform and migrant workers, who are doubly marginalised both within platform work and within emerging associations. Additionally, fostering cross-sectoral links is crucial: traditional unions in sectors such as transportation, construction, and domestic work must recognise platform work as a development that will reshape their membership and operations, rather than treating it as a separate issue.

Develop data on the sector

WSM, ACV-CSCi, and the INSP!R network could assist organisations in developing their own evidence base by documenting working conditions, monitoring earnings and hours, profiling platform workers and their vulnerabilities, and analysing algorithmic patterns. This data can serve as a valuable resource for organisations engaging in regulatory discussions. It is important that this information is shared among workers through their preferred communication channels, such as WhatsApp groups.

Raise awareness of the progressive platformisation or Uberisation of work in the labour market

Rather than operating in isolated silos, platform work increasingly influences sectors beyond the traditional labour market. WSM, ACV-CSCi, and the INSP!R network should raise awareness among its affiliated organisations about this trend and encourage public solidarity with platform workers, especially migrants and vulnerable populations whose presence in platform work is used to undermine support for their rights.

Support the development of diversified advocacy strategies beyond street protests

In contexts such as Peru, where small platform workers' unions operate, street protests have had limited influence, whereas in Indonesia, strikes have led to short-term improvements. WSM, ACV-CSCi, and the INSP!R network should assist organisations in expanding their advocacy tactics: engaging platform users as allies, forming alliances with consumer groups, leveraging strategic litigation, and employing media and public campaigns to highlight working conditions in digital labour platforms.

Annexes

Annex 1 List of interviews

Profile	Interview date	Scope
Trade union representative	22/04/2026	Africa
Trade union representative	22/04/2026	Africa
Researcher	25/02/2026	Brazil
Researcher	03/03/2026	Brazil
Researcher	20/03/2026	Brazil
Trade union representative	20/03/2026	Brazil
Company representative	09/04/2026	Burkina Faso
Platform promotor	09/04/2026	Burkina Faso
Public servant	06/04/2026	Burkina Faso
Researcher	15/04/2026	Burkina Faso
CSO	27/03/2026	Burkina Faso
CSO	06/02/2026	Global
CSO	12/03/2026	Indonesia
Expert	19/03/2026	Indonesia
Researcher	31/03/2026	Indonesia
Trade union representative	25/03/2026	Latin America
Researcher	20/02/2026	Peru
Researcher	25/02/2026	Peru
CSO	25/02/2026	Peru
Public servant	19/03/2026	Peru
Trade union representative	19/03/2026	Peru

Annex 2 Examples of platform regulations in South America

Country	Argentina	Chile	Mexico	Uruguay
Law	Labour Modernisation Law (Law 27802)	Law for Companies and Workers of Digital Service Platforms (Law 21431)	Federal Labour Law (Chapter IX Bis)	Law 20396 on minimum working conditions for the provision of services through digital platforms
Date	06/03/2026	11/03/2022	24/12/2024	18/02/2025
Recognition of work relationship	No	Yes	Yes	Yes
Definition of platforms	A legal entity that, for a fee, manages or oversees executable code in mobile or fixed devices' technological applications, allowing the independent platform provider to offer and enter into contracts with users for mobility services or the delivery of goods. (Art. 120, 5)	That organisation which, for a fee, manages or operates a computer system or technology used in mobile or fixed devices, enabling a digital platform worker to provide services to users of that system within a specific geographic area. (Art. 152, a)	It is a subordinate employment relationship that consists of the performance of paid activities that require the physical presence of the worker for the provision of the service, which are managed by a natural or legal person in favour of third parties through a digital platform, using information and communication technologies to exercise command and supervision over the worker. (Art. 291 A) Users, consumers, or beneficiaries of tasks, services, works, or jobs offered through computer applications will not be considered employers or jointly liable for workers on digital or similar platforms, as this status will belong to the individual or	Computer programs and procedures of companies that, regardless of their location, connect clients with workers, facilitating the delivery of goods or urban and heavy passenger transport within the national territory, and are able to participate in setting prices or methods of service execution. (Art. 2)

Country	Argentina	Chile	Mexico	Uruguay
			<p>legal entity that manages or administers the services through the same. (Art. 291 B)</p> <p>Work on digital platforms will be primarily flexible and discontinuous, so it will be understood that an employment relationship exists during the time actually worked by the digital platform worker. (Art. 291 D)</p>	
Definition of workers	<p>Independent provider of technology platforms</p> <p>Providers have the right to connect without the need for a minimum frequency (Art. 126, 8).</p>	<p>A worker who performs personal services, whether self-employed or for others, is requested by users of an application administered or managed by a digital service platform company. Digital platform workers will be classified as either dependent or independent workers, based on whether they meet the established requirements. (Art. 152, b)</p>	<p>A digital platform worker is someone who provides personal, paid, and subordinate services under the command and supervision of a natural or legal person who offers services to third parties through a digital platform, and generates net monthly income equivalent to at least one minimum monthly wage in Mexico City for their work, regardless of the time actually worked. Workers who provide services through digital platforms will be considered independent contractors if they do not generate the aforementioned income at the end of each month. However, during that period and for the time actually worked, they will be entitled to the rights stipulated in this chapter, with the exception of the provisions in Section V regarding the withholding and payment of social security contributions (Art. 291 C).</p>	<p>'Worker' refers to any person providing services, whether as an employee under an employment relationship or independently and autonomously. (Art. 3)</p> <p>The dependent worker may not perform tasks that exceed 48 (forty-eight) hours per week on the same digital platform. (Art. 15)</p>

Country	Argentina	Chile	Mexico	Uruguay
Minimum payment and associated costs	Independent providers have the right to receive payment for their services from the consumer through the platform. Additionally, they are entitled to keep one hundred per cent (100%) of any gratuity, reward, or tip added by users. (Art. 126, 7)	The pay for hours actually worked must not be less than the proportional amount of the minimum monthly income set by law, increased by twenty per cent, which is intended to compensate for waiting times and any other non-working periods to which the dependent digital platform worker may be subject. (Art. 152, V). For independent workers, the calculation will be made by dividing the minimum monthly income by 180 hours. (Art. 152, Y).	Wages for platform work will be set per task, service, project, or job performed (Art. 291 F).	The worker's remuneration may be based on time worked, production, or piecework. For each piecework unit or hour worked, the worker shall be entitled to receive, proportionally, the value of the national minimum wage. Wage deductions related to the inherent risks of the activity are prohibited (Art. 16).
Social protection	<p>Independent providers must meet tax and social security duties and pay contributions to the Basic Universal Benefit (PBU), disability retirement, or survivor's pension (Art. 125, 2).</p> <p>They are entitled to personal accident insurance provided by the platforms, which, at a minimum, must cover risks such as accidental death, total and/or permanent partial disability resulting from providing the service, medical and pharmaceutical expenses, and funeral costs. The responsibility for providing this insurance and covering the related expenses will be decided by mutual agreement. This does not assign exclusive responsibility to either party, nor does it imply an employment relationship or dependency between the platforms and the delivery drivers. (Art. 126, 6)</p>	Independent workers will have the right to access social security coverage by contributing as applicable. Coverage includes: health, old-age pensions, recognition of family dependents, insurance for work accidents and occupational diseases, disability and survivor insurance, insurance for accompanying children affected by a serious health condition, and other applicable coverages (Art. 152, Y).	<p>Employers and administrators of digital platforms in Mexico are required to register all their workers with the Mexican Social Security Institute (IMSS). They must calculate, withhold, and pay both employer and employee social security contributions and make the appropriate contributions to the Workers' National Housing Fund (FONAVIT).</p> <p>Platform workers are protected by IMSS throughout each trip and their entire workday. Those earning at least the minimum wage receive full social security benefits, including coverage for work-related risks, illness and maternity, unemployment in old age, disability, childcare, and other social benefits. Additionally, these workers have access to</p>	Autonomous workers may opt to be governed by the mono-tax regime to access all social security benefits without affecting other legal methods they might choose to pay taxes for their services (Art. 18).

Country	Argentina	Chile	Mexico	Uruguay
			loans and benefits provided by the FONAVIT. (Art. 291 K V; VI)	
Anti-discrimination	N/A	In implementing algorithms, digital service platform companies must respect the principles of equality and non-discrimination. To this end, they must take all necessary measures and safeguards to prevent any type of discrimination among workers, particularly in job assignments, bonus and incentive offers, and compensation calculations, among other things (Art. 152, E).	<p>Digital platform companies must observe a gender perspective that protects workers from acts of discrimination, workplace violence, sexual violence, harassment or bullying related to their work, and that allows them to reconcile work with personal and family life (Art. 291 R).</p> <p>Digital platform companies must establish specific mechanisms for addressing and monitoring complaints or reports regarding lack of integrity or honesty, acts of workplace violence or sexual violence, acts of violence, threats, insults, harassment or sexual harassment, mistreatment, discriminatory acts or other similar acts against workers on digital platforms due to their work (Art. 291, K IX).</p>	Companies that own digital platforms must respect the principles of equality and non-discrimination when implementing algorithms (Art. 4).
Transparency	Independent providers have the right to receive an explanation of why the platform suspends or disables, partially or totally, access to the digital infrastructure (Art. 126, 2).	The employee has the right to request access to their personal data from the digital service platform company at any time, especially data related to their performance evaluation and its impact on their work. For proper oversight by the relevant authorities, digital service platform companies must, if required, provide access to the algorithm's code, explanations of its decision-making process, the data used for training, and any other	The rules for assigning tasks, services, projects, or work through algorithms or similar mechanisms must be transparent, clear, and known to all workers on digital platforms. An algorithm is defined as the use of decision-making systems that allow for automated or similar control and supervision of digital platform workers. Service providers on digital platforms must develop a policy document on algorithmic	<p>Platform companies must inform all workers about:</p> <p>A) Automated tracking systems used to control, monitor, or evaluate their performance.</p> <p>B) Automated decision-making systems that impact working conditions, including access to work, income, health and safety, hours, advancement, contractual status, or account status. Disclosure of the</p>

Country	Argentina	Chile	Mexico	Uruguay
		<p>relevant factors to ensure full compliance with the law (Art. 152, D).</p> <p>The digital service platform company must guarantee that independent digital platform workers have a minimum disconnection period of twelve hours within a twenty-four-hour span. The company may temporarily disconnect the worker but cannot impose other disciplinary actions for reasons such as the worker declining an offered service or not logging into the digital platform during a specific timeframe (Art. 152, Z).</p>	<p>work management that informs workers, using simple and clear language and avoiding inaccurate, ambiguous, or vague phrases, about the elements used by the algorithms for decision-making that may affect the employment relationship. (...) The algorithmic work management policy will form part of the digital platform employment contract and must be made known to all workers at the start of the employment relationship (Art. 291 J).</p>	<p>platform's algorithmic code is not required (Art. 4).</p>
Workers' representation	N/A	<p>Workers on digital service platforms may freely form trade unions without prior authorisation and shall enjoy all rights and obligations. Trade unions may represent dependent and/or independent platform workers (Art. 152, H).</p> <p>Rights apply to independent workers who, during the last three months, have provided services through a certain platform for at least 30 hours on average each week (Art. 152, B).</p>	<p>Workers on digital platforms will enjoy all rights, including collective rights recognised by this Law, for which digital platform companies must establish mechanisms that guarantee their full exercise (Art. 291 I).</p>	<p>Autonomous workers have the right to exercise freedom of association and to collectively bargain with the company that owns the digital platform on which they perform their tasks (Art. 19).</p>

Annex 3 Examples of platform regulations in Asia and Africa

Country	India	Malasia	Singapore	Kenya
Law	Code on Social Security 2020	Gig Workers Act (Act 872)	Platform Workers Act	Platforms are partially regulated by the National Transport and Safety Authority Act
Date	12/11/2025	31/12/2025	10/09/2024	31/12/2022
Recognition of employment contract	Depends on individual state legislation	No	Yes	No
Definition of platforms	Work arrangement outside of a traditional employer-employee relationship in which organisations or individuals use an online platform to access other organisations or individuals to solve specific problems or to provide specific services (Art. 60).	Any digital intermediary system provider that connects a gig worker to a service user (Art. 2) A service agreement might be oral or in writing between a contracting entity and a gig worker, but does not include a 'contract of service' or a 'contract of employment' (Art. 2).	Service specified in the First Schedule that is provided in Singapore via a digital platform or other platform by a platform operator exercising management control in respect of the provision of that service by one or more platform workers of the platform operator (Art. 3).	'Transport network company' means a person, entity or company who or that connects transport network passengers with transport network drivers for transport network services exclusively through the offering, use or operation of a transport network platform but does not include a person, entity or company that provides street-hailing taxicab services, limousine or other transportation service arranged by a method other than through a transport network platform (Art. 2).
Definition of workers	Person engaged in or undertaking platform work (Art. 61).	An individual who a) is a citizen or a permanent resident of Malaysia; b) enters into a service agreement with a contracting entity for the performance	Individual who - (a) has an agreement (whether written or oral and whether	'Transport network driver' means a person authorised by a transport network company to offer transport network services to

Country	India	Malasia	Singapore	Kenya
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		of any service, whether with a platform provider or any other contracting entity listed in the Schedule, and receives earnings for the service (Art.2).	express or implied) with a platform operator to provide a platform service in Singapore to service users for the platform operator; b) is subject to the management control of the platform operator in respect of the individual's provision of the platform service; (c) derives or will derive, under the agreement mentioned in paragraph (a), any payment or benefit in kind from the individual's provision of the platform service for the platform operator; and (d) is in Singapore when providing the platform service, but excludes an individual who belongs to a prescribed class of individuals (Art. 5).	transport network passengers through a transport network platform (Art. 2).
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Minimum payment and associated costs	Depends on individual state legislation	Where a service agreement does not specify any terms and conditions regarding the payment of earnings to a gig worker, a contracting entity shall pay the earnings within seven days from the completion of the service (Art. 11). A contracting entity shall not deduct anything from a gig worker's earnings, tips, or gratuities unless the deduction - (Art. 12). When, by court order requested by the secured creditor or the person liable under this Act to pay the earnings to a gig worker,	N/A	N/A
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Country	India	Malasia	Singapore	Kenya
		or any money owed to the liable party, is attached or garnished, the court, receiver, or manager shall not authorise payment of the sale proceeds or the attached or garnished money to the secured creditor or debenture holder until they have determined and arranged for the payment (Art. 15).		
Social protection	The Central Government may establish schemes to provide benefits for unorganised, gig, and platform workers and their families, covering areas such as life and disability, health and maternity, old age protection, education, and other benefits as determined (Art. 109). Scheme details, including contributions, benefits, eligibility, and terms, will be specified within each scheme (Art. 45). Additionally, the Central Government shall establish a Social Security Fund for the welfare of these workers (Art. 141).	A gig worker shall have the rights - (a) to social security contributions deducted from the earnings payable to the gig worker, made by the contracting entity on behalf of the gig worker to the organisation; and (b) to access such deduction of social security contributions in the digital intermediary system developed by the contracting entity. (Art. 82). A contracting entity that is a platform provider shall ensure the registration of the gig worker under the Self-Employment Social Security Scheme (Self-Employment Social Security Act 2017) (Art. 83, b).	Existing acts were modified to include platform workers as employees and platforms as employers (e.g., Ninth Schedule, Part 3A). Under these changes, platform operators are liable to pay for compensation in case of work injury and associated incapacity. Workers born after Jan 1, 1995 must contribute monthly to the Central Provident Fund (CPF) to access to pensions (Fifth Schedule). A CPF Transition Support was created to supplement an increase in contribution rates.	No mentions to social protection, but includes other measures: A transport network company shall put in place measures to guarantee the security, protection and privacy of the transport network driver and transport network passenger. (Art. 14, 5). A transport network company shall configure its transport network platform to ensure that after eight hours of continuous services in a twenty-four-hour period, the driver shall log out of the platform for at least four consecutive hours (Art. 14, 10).
Anti-discrimination	N/A	A contracting entity shall not discriminate against any gig worker regarding work conditions, service assignments, or payment of earnings (Art. 9).	Any platform operator that, in the engagement of persons to provide a platform service for the platform operator, discriminates against a person by reason of the circumstance that the person - (a) is or proposes to become an officer or a member of a	N/A

Country	India	Malasia	Singapore	Kenya
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			<p>platform work association or an association that has applied to be registered as a platform work association;</p> <p>(b) will, if engaged, be entitled to the benefit of a collective agreement or an award; or</p> <p>(c) has appeared as a witness, or has given any evidence, in any proceeding under this Act, shall be guilty of an offence and shall be liable on conviction by a District Court to a fine not exceeding \$5,000 or to imprisonment for a term not exceeding 12 months or to both (Art. 77, H).</p>	
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Transparency	N/A	<p>A gig worker (a) must be informed electronically about the automated monitoring systems used by the platform provider to oversee, supervise, or evaluate the gig worker, including the consequences of such monitoring; (b) must be informed electronically about the automated decision-making systems used by the platform provider to make decisions related to assigning the service and the gig worker's working conditions; and (c) must have access to a non-automated review process. (Art. 8, 2)</p> <p>A platform provider shall have the right to deactivate a gig worker's access to their digital intermediary system if - (a) the deactivation complies with the terms and conditions of the service</p>	N/A	<p>A person, entity or company shall be eligible to apply for a transport network license if they explain to drivers or owners the procedure for activating and deactivating the subscription service; (Art. 6 h); and the deactivation policy. (Art. 6 l)</p> <p>Transport network company shall, before deactivating, suspending or removing a transport network vehicle owner or a transport network driver, provide written reasons for its decision to deactivate, suspend, or remove from the transport network platform (Art. 15, d).</p>
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Country	India	Malasia	Singapore	Kenya
		agreement; or (b) misconduct occurs during the gig worker's service (Art. 14).		
Workers' representation	N/A	Any terms and conditions of a service agreement shall be void if they, in any way, restrict or exclude the rights of a gig worker - (a) to associate with others to establish a gig workers' association; (b) to join any gig workers' association; or (c) to participate in activities organised by any gig workers' association, whether the gig worker holds office in the association or not (Art. 10).	Subject to any other written law currently in effect, every term of an agreement between a platform operator and a platform worker that attempts to restrict or exclude, in any way, the right of a platform worker to do any of the following is void: (a) to join a registered platform work association; (b) to participate in the activities of a registered platform work association, whether as an officer or in another capacity; (c) to associate with others for the purpose of organising a platform work association (Art. 7).	N/A

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