Platform work is dangerous

Addressing Occupational Safety & Health risks in the platform economy

platforum

Chapters

Acknowledgements

On 19-20 June, the European Trade Union Confederation held a workshop in Dublin, Ireland on platform work and Occupational Safety & Health (OSH) as part of the Fair Platforms Project. The event was an opportunity to discuss with trade unionists from across Europe the experience they have had with OSH in the platform economy and to present the preliminary findings of this study for feedback. Presentations were also made on OSH in platform care work, the impact of gamification on OSH, the Irish OSH framework, and a first-hand account of the psycho-social hazards experienced by Kauna Malgwi, a content moderator in Kenya. There were also country reports on OSH-relevant platform work issues from Portugal, Poland, Italy and Austria.

The workshop made a significant contribution to informing the final version of this study and we thank all attendees for their input.

Foreword

Platform work has become a defining feature of Europe's labour market. From food delivery and transport to care work and digital tasks performed behind a screen, millions of workers now depend on platform-mediated labour for their livelihoods. Yet, as this report clearly demonstrates, the organisation of platform work too often comes at the expense of workers' health, safety and dignity. For trade unions, this is not a marginal issue: occupational safety and health (OSH) is a core workers' right, inseparable from fair working conditions, social protection and collective representation.

From a trade union perspective, the risks faced by platform workers are neither accidental nor unavoidable. They are the direct result of business models built on cost externalisation, algorithmic management and the systematic misclassification of workers as self-employed. Physical injuries, psychosocial stress, fatigue, exposure to violence, and the long-term health impacts of insecure and intensified work are not side effects of digitalisation; they are predictable outcomes of a regulatory vacuum that allows platforms to evade responsibility. Algorithms that allocate tasks, set pay and monitor performance actively shape how work is done and at what pace, often pushing workers to take risks that would be unacceptable in any other workplace.

At the same time, the European Union is at a critical turning point. With the adoption of the Platform Work Directive, Member States now have a unique and time-limited opportunity to correct structural injustices in the platform economy. The transposition phase is not a technical exercise; it is a political moment. Governments can choose whether to merely reproduce minimum standards or to use this momentum to ensure that platform workers are fully covered by labour law, OSH legislation and collective rights. Trade unions are clear: effective protection of workers' health and safety will only be achieved if the presumption of employment is implemented robustly and enforced in practice.

Crucially, this report underlines that the challenge extends beyond the platform economy alone. Algorithmic management, digital surveillance and automated decision-making are spreading rapidly across all sectors. Without strong safeguards, these systems risk reproducing the same harms—work intensification, stress, loss of autonomy and unsafe working conditions—throughout the wider labour market. Protecting workers from algorithmic harm therefore requires a universal approach: algorithms must be regulated as part of the workplace, subject to risk assessment, transparency, worker participation and collective control.

None of this is possible while workers continue to be falsely labelled as self- employed.

Bogus self-employment strips people of their right to prevention, protection, representation and redress. Furthermore, workers' contractual relationship should never interfere with their right to health and safety at the workplace. Trade unions, therefore, urge policymakers to ensure that occupational safety and health protections apply to all workers, regardless of employment status, and that those who exercise control over work are held responsible for preventing harm.

This report is a call to action. It is addressed to policymakers, regulators and social partners, but above all, it speaks to the labour movement and its representatives themselves. Trade unions have always been the driving force behind progress in occupational health and safety. At this decisive moment, unions must again lead the way—organising platform workers, shaping transposition debates and ensuring that digitalisation serves people, not the other way around.

Brussels, January 2026

Tea Jarc, ETUC Confederal Secretary

Executive Summary

The ways in which work is typically organised on digital labour platforms significantly exacerbates occupational safety and health (OSH) risks for workers. These heightened OSH risks exist for both on-location and remote platform workers, and include both physical and psycho-social risks.

Responsibility for OSH is primarily determined by employment status in European labour law. For employees, the employer has primary responsibility for worker health and safety, requiring them to conduct risk assessments, provide protective equipment and consult workers on OSH risk prevention and protection. For self-employed workers, OSH responsibility falls on their shoulders.

In the platform economy, the widespread hiring of workers on a bogus self-employed basis creates a major problem for ensuring worker health and safety. Platform workers have the legal responsibility for their OHS protection without having any of the means necessary to guarantee their own safety in practise, because the organisation of the work and its conditions is dictated by the platform, not by the worker.

Indeed, platforms seeking to avoid employment contracts have an incentive not to provide their workers with even the minimum level of equipment and training they need to safely carry out the job, in case this is used in a bogus self-employment legal claim by workers or labour inspectorates. **This deliberate choice puts the lives of workers at risk.**

Two separate studies in the UK and France have both found that food delivery couriers hired on a self-employed basis are about twice as likely as employed riders to have suffered an injury while working. Specific causes of road accidents in the platform economy include:

- Pay-per-task, incentivising workers to go faster in order to earn more money;
- Low pay, requiring workers to work long hours to earn enough money and therefore suffering from tiredness while at work;
- Distraction from the app, which sends task requests to workers while they are on the road;
- A lack of training and safety checks.

The use of algorithmically-determined forms of pay also creates financial incentives for workers to risk their health, such as during extreme weather events when customer demand surges and pay rates go up through surge pricing.

The use of algorithmically-determined forms of pay also creates financial incentives for workers to risk their health, such as during extreme weather events when customer demand surges and pay rates go up through surge pricing.

A lack of personal protective equipment provided by the platform increases the risk of illness, and when workers get ill, they don't receive sick pay, pressuring them to work while sick, further damaging their health and potentially the health of customers as well. This problem was highlighted during the covid-19 pandemic.

Remote platform workers behind the screens are at risk of musculoskeletal disorders, the most common cause of occupational illness in Europe today, due to having to maintain a sedentary position for a long period of time and carry out repetitive movements. Food delivery couriers are also at high-risk of musculoskeletal disorders due to the pressure of their back-pack on their body and maintaining the same position for long periods of time.

These risks can be alleviated by better equipment and better posture, with employers often investing significantly in optimal ergonomics for their workers to prevent absenteeism. However, in the context of (bogus) self-employment, the worker is left to their own devices.

On-location platform workers can face problems with customer violence, with platforms' automated systems for communicating with workers providing little help. Moreover, the platforms typically trust the customers word over that of the worker, forcing many workers to have to carry-out their own personal surveillance to be able to defend themselves in the case of a dispute with a customer. Customer rating systems create a power imbalance between customers and workers which can make workers fearful about challenging abusive behaviour, including sexual harassment, a problem many female platform workers face.

The way platform work is organised can also generate psychological problems for workers, affecting their physical and mental health over the long-term. Psycho-social risks for platform workers include:

- The physical and social isolation which comes from working individually, being managed by an algorithm and having no opportunity for career progression.
- The use of 'black-box' algorithms and intensive digital surveillance, which can increase levels of stress and anxiety due to not understanding the rules which govern their work and feeling constantly under pressure from the app.

- The transient working lives which most workers in the gig economy have, defined by high levels of job insecurity and precariousness, which offers no stability and consistency in their lives, important factors in mental health.

What can be done to tackle OSH dangers in the platform economy? The EU Platform Work Directive (PWD) establishes a legal presumption of employment in the platform economy, meaning workers should be able to secure their collective OSH rights as employees.

As for (genuinely) self-employed platform workers, PWD includes a requirement on platforms to establish reporting channels so that workers can inform the platform about any issues they are facing in real-time. However, there is no clarity in the Directive about what platforms are required to do once a problem is reported through these channels.

When the Directive is transposed into national law, it's possible to include a number of additional measures which would strengthen OSH rights for platform workers, including that all platform workers should have OSH coverage while working for a digital labour platform regardless of employment status, and that it should be prohibited for platforms to send task request messages to drivers or riders while their vehicle is in motion.

Most importantly, addressing OSH risks in the platform economy requires union organisation. The role of unions is vital for optimal OSH in all workplaces and platform work is no different. The traditional union methods, of establishing union health and safety representatives in each workplace and a joint health and safety committee between workers and management to make recommendations on OSH issues, should be applied in the platform economy whenever a collective agreement is secured.

There are already some good examples of collective agreements in the platform economy which take into account platform work-specific OSH challenges. The collective agreement in Spain between Just Eat and UGT/CCOO has a chapter specifically dedicated to OSH, which includes regular training and medical examinations for riders. An agreement between cleaning platform Hilfr and 3F in Denmark includes that "employees have co-influence and co-determination on matters concerning health and safety at work".

In workplaces where the union is not recognised by the platform, OSH campaigning can be an important strategy to grow the union's strength among workers, including acting as a recruitment tool, as well as a means to apply pressure on the platform. This campaigning

may also include putting pressure on politicians and regulators to take action, since OSH vulnerabilities in a sector like food delivery can also be a health risk for the wider public. The Bologna Charter in 2018, signed by local platforms, politicians and riders to improve workers' conditions, especially on OSH issues, is one example of how campaigning efforts by riders hired on a self-employed basis can be highly effective.

Unions organising in the platform economy - whether they have a collective agreement or not, and whether the workers are hired as employees or self-employed - should develop an OSH-specific strategy, including potentially establishing a union health & safety committee to co-ordinate this activity.

Introduction

On the evening of 1 October 2022, Sebastian Galassi died, after a crash with a Land Rover in Florence, Italy. Galassi, aged just 26, was on a scooter whilst working for food delivery platform Glovo.

Almost 24 hours after the accident, Galassi's phone received a message from Glovo: "We are sorry to have to inform you that your account has been deactivated for non-compliance with the Terms and Conditions".

Glovo's algorithmic management system had registered that Galassi had not delivered the food to its destination and 'robo-fired' him as a consequence, but it knew nothing about why Galassi had failed to deliver the food. Glovo had to be informed by others that their rider was involved in a fatal accident.

"He wanted to work in graphic design," his girlfriend, Valentina, said after Galassi's death. "And he wanted to start a family with me and have two dogs."[1]

Galassi's story speaks to the inhumanity of algorithms controlling everything about the platform work process that relates to productivity and customer satisfaction, and nothing about the health and safety of the workers themselves. Indeed, since most platform workers in Europe are currently hired on a self-employed basis, the digital labour platforms they work for usually have no legal obligation to take into account their occupational safety and health (OSH) at all.

The determination of digital labour platforms to avoid employment contracts for their workers creates perverse incentives. Platforms have an interest in not providing their workers with OSH equipment and training in case it is used as evidence that these workers are bogus self-employed. Despite the algorithmic management systems of platforms having mountains of OSH-relevant information at their finger-tips, such as how long a worker has been working on the platform without a break, none of this is ever used to control and limit OSH risks, since collective agreements on OSH are currently the exception rather than the norm.

What's more, the use of dynamic pricing to calculate pay rates can be used to incentivise platform workers to work at times of peak danger. Pay rates are raised during extreme heat and floods, when customer demand for food delivery goes up. A model of work that

---

1 Flavia Amabile (2022). 'In morte di un rider: Firenze piange Sebastian' (In English: 'On the death of a rider: Florence mourns Sebastian'). La Stampa.

systematically places the convenience of customers above the health of workers is one that is broken and needs to be fixed.

In this report we will examine the full range of OSH risks in the platform economy, from physical to mental health, and across on-location and remote platform work. We will then look at the OSH legislative framework, exploring how current laws function and what difference new laws, including the Platform Work Directive, could make. The final section looks at the indispensable role of unions in OSH, and how best to adapt this approach to the specific context of platform work.

In responding to Galassi's death, unions in Florence organised a strike with a banner which read: 'My life is worth more than a sandwich'.[2] The aim of this report is to provide information and ideas for unions in their efforts to make sure that the fruits of platform workers' labour - whether that be a sandwich, a cleaned house, a delivered passenger, a transcribed audio file or annotated data - are no longer prioritised above platform workers' lives.

---

2 Ben Wray (2022). '"My life is worth more than a sandwich": Strike in Florence after death of a rider'. Brave New Europe - The Gig Economy Project.

1. Physical health risks in the platform economy
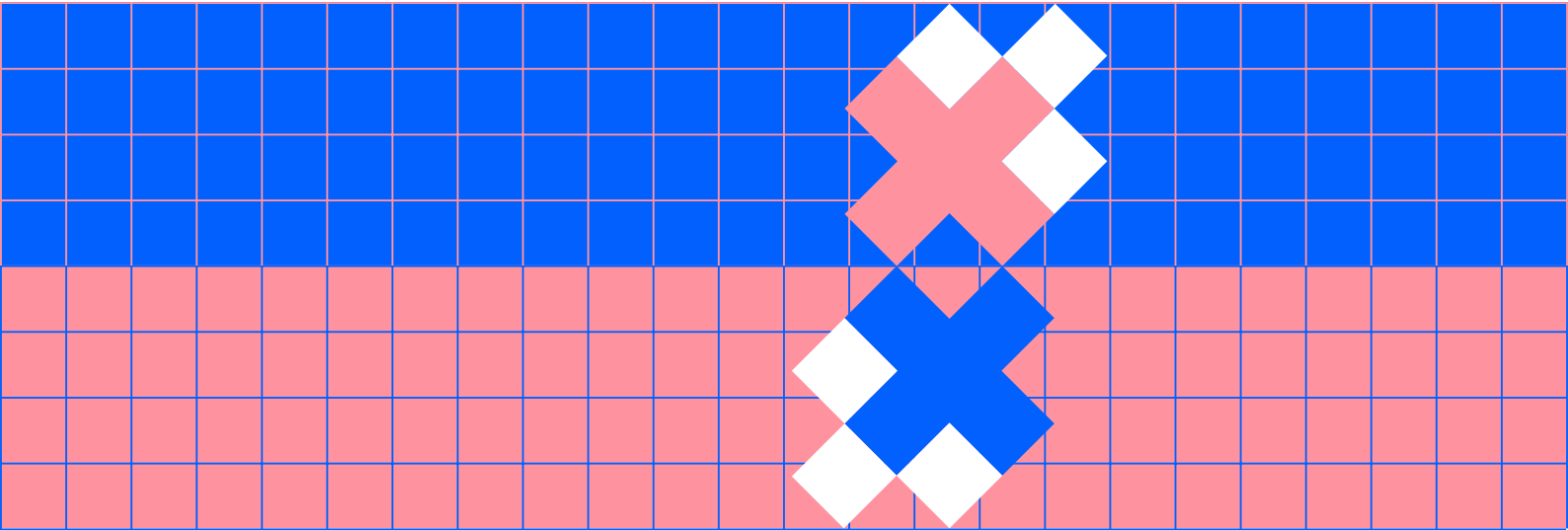
a) Accidents

Food delivery, parcel delivery and ridehail are three of the most well-known forms of platform work and all are in the transport sector, where OSH risks are significantly higher than most sectors, principally due to the risk of accidents from collisions on the road. There is now considerable evidence that these risks are intensified by the platform work model.

I) Employed versus self-employed

Academics Nicola Christie and Heather Ward have researched motorcycle couriers in the UK, comparing employees for a pizza restaurant chain, and those working self-employed for digital labour platforms like Deliveroo and Uber Eats.[3] The study, which included a survey and in-depth interviews, found that the gig workers were more than three times as likely as the employees to have damaged their vehicle in an accident and twice as likely for someone to be injured in an accident.

The employees were typically given protective equipment such as helmets. They were encouraged to take breaks from the road if they were getting tired and were not expected to work in dangerous conditions. Furthermore, one company with employed riders would show concern if they had arrived quicker than the system had estimated, leading to warnings not

---

3 Nicola Christie and Heather Ward (2022) 'Delivering hot food on motorcycles: A mixed method study of the impact of business model on rider behaviour and safety'. Safety Science, Vol 158.

to drive too fast. None of this applied to the self-employed riders.

The self-employed riders were much more likely to feel pressure to go faster than employees (56% versus 39%), much more likely to carry a load which made the motorcycle feel unstable (42% versus 19%), and almost three times as likely to find their phone very or a little distracting (57% versus 21%). Indeed, employed riders do not need to respond to task requests, so the use of an app while working had little relevance to them, with the only possible distraction being a phone call from a customer asking about a late delivery.

"The business model where motorcyclists are employed seems to be a much more effective way to manage the occupational risks of hot food delivery by motorcycle compared to work via digital platforms," Christie and Ward concluded.

A study by the National Agency for Food, Environmental and Occupational Health and Safety (Anses) in France on the food delivery sector came to a similar conclusion. Anses found that while 26.4% of riders had suffered an accident at work, this number rose to 46.2% when the riders were working on a self-employed basis.[4]

Anses found that a major cause of this higher rate of accidents was bogus self-employment, because these riders didn't benefit from OSH despite the fact that "it has been widely demonstrated in case law, academic research, and numerous reports that they lack the means to decide or influence the organisation of their work and the resulting conditions."

"As organisers of delivery workers' work, platforms hold the main levers for implementing a prevention policy," the study added.
 Furthermore, bogus self-employment also acts to camouflage the real extent of OSH risks in the platform economy due to the lack of government data collection on self-employed workers.

"This deficiency, which is largely explained by the self-employed status of the delivery service provider, contrasts with the massive data collection carried out by platforms on their operations, delivery drivers, and consumers," Anses finds.

Finally, an additional way in which injuries in food delivery are hidden is the high number of undocumented workers in the sector. Undocumented riders typically pay someone who has a registered account with a platform for use of the account, a practice which is known as sub-letting, sometimes paying as much as 50% of their earnings. Because these riders

---

4 Anses (2025). 'Livreurs de repas des plateformes numériques : des conditions de travail qui dégradent leur santé' (in English: 'Food delivery workers on digital platforms: working conditions that degrade their health'); https://www.anses.fr/sites/default/files/AP2021-SA-0045RA.pdf

do not have citizenship, if they have an injury they fear even going to hospital in case their undocumented status is revealed. These riders are the most vulnerable to injury because they have to work very long hours to earn enough, since a large portion of their salary goes towards paying the cost of sub-letting the app account.

Anses finds that the proliferation of undocumented riders causes "an invisibility of health issues, the aggravation of which creates negative effects for individuals and, more broadly, for public health." An investigation into rider accident insurance in the Spanish city of Bilbao found that undocumented riders were the most likely to get injured while being unable to access insurance, as the insurance is in the name of the account holder, not the rider doing the work.[5]

II) Pay-per-task

A piece rate system of pay, where workers are paid per task completed (rather than per hour) and are not paid for waiting time between tasks, is a key cause of OSH risk as it creates a financial incentive for workers to go faster in order to earn more money

Christie and Ward have conducted in-depth interviews with platform workers and managers in the transport sector and found that pay-per-task was a major health risk, with one manager for a parcel delivery platform admitting: "They're rushing too much because it's piece work, they are trying to get as many done as quickly as possible, so they're likely to cut corners and put themselves and others at danger."[6]

The risks of the pay system are exacerbated by the use of dynamic pricing to set pay rates. Riders are given financial incentives to work during extreme weather such as torrential rain and extreme heat because consumer demand rises at these times, an algorithmically-determined pay practice known as 'surge pricing'.

It was reported in July 2025 that food delivery platform Glovo e-mailed its riders in Italy offering "heat bonuses": a 2% increase in wage rates during temperatures from 32-36 °C, a 4% increase in 35-40 °C temperatures, and an 8% increase for temperatures over 40 °C. The e-mail stated the price increases during extreme heat were "a financial contribution towards the purchase of sunscreen, rehydration salts, and water". The bonuses were to be paid from 21 September, some 10 weeks after the e-mail was sent.[7]

5 Ben Wray (2023). 'Jugarse la vida como rider en Bilbao por cuatro duros y sin amparo legal' (In English: 'Risking your life as a rider in Bilbao for four bucks and without legal protection'). El Salto Diario.
6 Nicola Christie and Heather Ward (2019). 'The health and safety risks for people who drive for work in the gig economy'. University College of London.
7 Serena Palumbo (2025). 'Glovo is offering riders a heat emergency bonus: a few cents more for working in temperatures up to 40 degrees' (In Italian: 'Glovo, ai rider il bonus per l'emergenza caldo: pochi centesimi in più per lavorare con temperature fino a 40 gradi').

After criticism from unions, which called for Glovo to suspend its activity during heatwaves, and the general public, Glovo announced that it would "temporarily deactivate" the scheme. However, it did not say it would stop deliveries during heatwaves, except in Piedmont, where the regional government had an issued an ordinance requiring food delivery platforms to suspend operations when extreme weather warnings are issued during the hottest part of the day. A court in the southern Italian city of Palermo mandated Glovo to distribute sunscreen and water for riders after several suffered sunstroke in 2022.[8]

Tiredness is also a problem because of low pay rates, motivating riders and drivers to work for long hours without breaks to earn enough money. Many riders and drivers reported to Christie and Ward that they worked 12 to 15 hours, with a third driving for more than 50 hours a week, which is above the legal driving limit in the UK. Several reported falling asleep at the wheel, with one reporting that they were involved in a collision after "I closed my eyes for a little bit too long". The following statement from one parcel delivery gig worker sums up the OSH risks of tiredness while on the road:

"Tiredness just totally affects us in the fact that your reactions aren't as fast. You're not noticing things that you would normally notice, albeit signs, kids stepping out, a car that's got a headlight out, easy to misinterpret it as a bike, and before you know it, even road markings and especially on the rural rounds where the road markings disappear. There have been a couple of times I've clipped kerbs, or you'll clip onto the grass verges and what-not."

The Anses French study found that the lack of pay for waiting time combined with opaque task allocation and the use of data for performance evaluation created an "anxiety-provoking situation" for riders which "encourages them to constantly try to 'do more' to generate a decent income: respond to notifications more quickly, deliver faster, stay connected longer, be connected during times when there are the most requests (evenings, weekends, bad weather days), etc," increasing the risk of accidents.[9]

III) App distraction

Another major OSH risk in platform work is caused by being distracted by the app. Whether a platform worker is on a bike or a car, the app is always turned on while driving in case of task messages from the platform or the customer, even though it is illegal to handle a mobile phone while driving.

Corriere Della Sera.

8 Amy Kazmin and Giuliana Ricozzi (2025). "Glovo pauses 'heat bonuses' for Italian food delivery workers after backlash". The FT.

9 Anses (2025). 'Livreurs de repas des plateformes numériques'.

The platform continues to send requests for new tasks while the worker is completing an existing task, with a beep sound made every time a request comes through. Because the worker has limited time to respond to a request before it is given to someone else (typically between about 30 to 90 seconds), drivers and riders often swipe to accept or reject a request while on the road.

The problem is worsened when it is raining. A protective cover is put over the app which prevents the worker from swiping the touch screen, meaning to accept an offer they have to take the phone out of the cover and put it back in, which is more time looking away from the road.

Christie and Ward interviewed one rider who said that the platform tells the worker that "you should pull over to accept an order", but "when you are on a main road where can you stop?" The rider continued: "So, when I get a job in, if I am on a main road at a speed of 40 or 60 [miles per hour] I don't accept deliveries but if I am on the quiet roads at 20/30 [miles per hour] I take it - it is just a few seconds but it is a distraction."[10]

The problem of app distraction is intensified when workers are 'multi-apping', working for multiple platforms in the same work day. Multi-apping brings with it the possibility of getting beeps for tasks by multiple apps at the same time.

One rider also reported that multi-apping increases the pressure to go fast to get various deliveries complete:

`"I will get a delivery with (Company H food delivery) and then it's very rare and I would have just picked it up, so I will have to deliver that now and then I will get a delivery with (Company G food delivery) or something and a few more in opposite directions and I will have to rush it, maybe do a little bit of speed."`

Christie and Ward concluded that: "Many of our participants found the app a distraction because it beeped when jobs were offered and they were continually looking down at it taking their eye off the road."

IV) Training and safety checks

Christie and Ward found that although the platforms conducted document checks to make sure that those who had registered on the platform had a license to drive a car, scooter

---

10 Nicola Christie and Heather Ward (2019). 'The health and safety risks for people who drive for work in the gig economy'.

or motorbike, "little attention was paid to raising awareness about safety or checking the roadworthiness of vehicles".

Furthermore, to avoid a legal claim of bogus self-employment being taken to cour, many platforms sought to avoid any form of training of their drivers and riders. Several of the workers who were interviewed for the study "observed that the companies they worked for were actually recoiling from providing any form of safety training because they did not want to be perceived as acting like an employer," Christie and Ward found.

One platform worker said:

"I think now because they make it clear that they are not employers and we are self-employed, they are very careful to not tell us what to do and not regulate us…The downside to this is they don't feel able to dictate safe terms for safety, they advise us."[11]

There was also little to no attempt by the platforms to consider using the data they collected through the app to manage safety. When asked what a parcel delivery platform does to monitor the health and safety of the riders, one manager responded: "We only monitor the life of a parcel".

Indeed, even when an accident does happen and the platform does become aware of it, they seem more concerned about the consequences for the customer than the worker. One platform worker told the researchers that: "If you are in a crash you have to inform [the platform] so they can contact the customer and say sorry."

Finally, because platform workers provide their own equipment, including the bike or motorbike, the financial cost to repair and renew equipment falls on the worker, who due to low-wages and precarious life circumstances may not be in a position to repair and renew equipment as much as is necessary, increasing the risk of equipment failing the worker while on the road. Some riders go without basic protective equipment, like a helmet, gloves and kneepads, altogether. One recent academic study found that insufficient and/or inadequate protective equipment was the largest cause of rider accidents, alongside pressure on the worker and rider inexperience.[12]

---

11 Nicola Christie and Heather Ward (2019). 'The health and safety risks for people who drive for work in the gig economy'.
12 Claire Bertenshaw, Andrew McKinlay and Gary Mitchell (2022). 'DINED (Delivery-related Injuries in the Emergency Department) part 1: A scoping review of risk factors and injuries affecting food delivery riders'. Emergency Medicine Australasia: Vol 34, Issue 2.

V) Conclusion

Christie and Ward's survey results of riders' and drivers' OSH found:

- 42% of couriers experienced a collision where there vehicle was damaged, 10% experienced accidents where someone was injured
- 75% agreed/agreed strongly that there had been occasions where they had to take action to avoid a collision
- 40% said the app had distracted them while driving/riding
- 16% said they struggled to stay awake while driving/riding
- 47% agreed/agreed strongly that "the time pressure of gig work can make you travel over the speed limit".
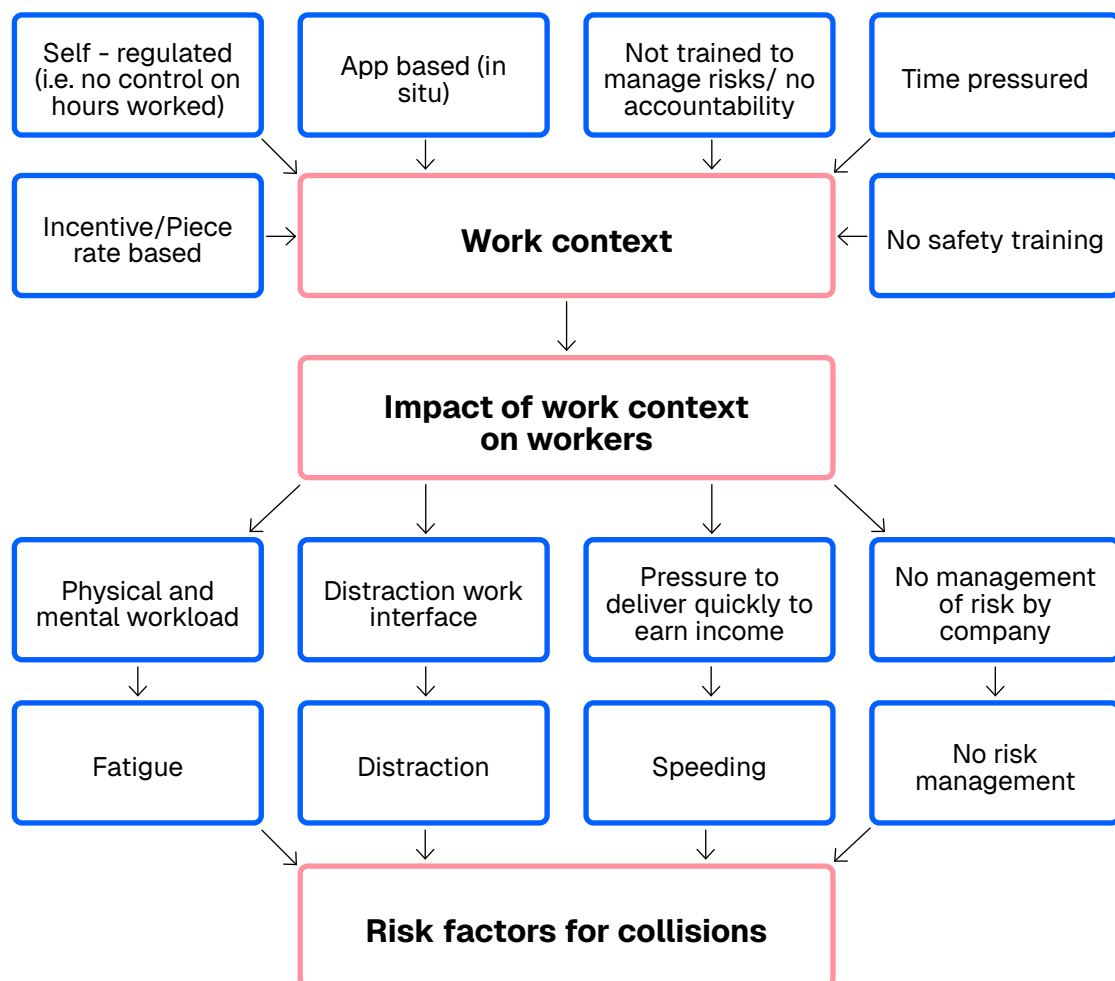
Diagram 1: 'Key road safety themes which emerge from research among gig economy drivers' (Christie and Ward, 2019)

- 63% agreed/agreed strongly that they sometimes park illegally to make a delivery
- 30% agreed/agreed strongly that they had run through a red light while they have been under time pressure.
- 67% said the platform had never suggested they should have rest breaks.
- Just 26% agreed/agreed strongly that the gig company they worked for cared about their safety.
- Asked if the responsibility for their safety should be their own, the companies or shared, 68% said it should be shared.

What this indicates is that the risk of an accident in platform work in the transport sector is high and the causes of those risks are equally clear: piece work, tiredness, app distraction, and little interest from the platform in training and safety checks. Diagram 1[13] illustrates the full spread of road safety risks connected to platform work.

Christie and Ward conclude that: "The business model of gig companies works on incentivising people to drive or ride in ways which, from a road risk perspective, are most dangerous for example at night and in dangerous weather conditions, using a distracting work interface in an intrinsically pressured environment."

b) Illness

The covid-19 pandemic brought media attention to the problems which platform workers face when sick. Delivery couriers were deemed to be 'key workers' by governments across Europe due to their importance in bringing food and other goods to vulnerable people who were isolating, but they themselves were not entitled to sick pay from platforms when ill due to their (bogus) self-employed status. The result was that many couriers continued to work while sick with covid-19 to pay the bills, further endangering themselves and others, while others stopped work in fear of catching the virus and bringing it back to family members at home, leaving them without an income.[14]

A lack of personal protective equipment (PPE), especially at the start of the pandemic (some platforms provided PPE once the crisis was in full-swing), also increased the chances of couriers getting ill while at work, and of passing the virus onto customers. Research by the Independent Workers of Great Britain (IWGB) Couriers and Logistics Branch in April 2020 found that out of 13 food delivery platforms in the UK analysed, eight had provided no PPE nor provided money to pay for PPE purchased by their riders.[15] PPE which was provided was often described by workers as inadequate, with one medical courier who was handling covid-19

---

13 Nicola Christie and Heather Ward (2019). 'The health and safety risks for people who drive for work in the gig economy'.
14 Chris Moody (2020). 'Food Delivery Workers Told Us About Their "Indescribable Fear" During the Coronavirus Outbreak'. Vice.
15 Independent Workers' of Great Britain (IWGB). 'Courier company responses to C-19'. Spreadsheet.

specimens stating that the PPE was "nothing that anyone with any medical knowledge would wear if they had another choice".[16]

For ridehail drivers, the pandemic brought with it a high risk of catching the virus while working, with many sick people taking taxis to get to and from hospital. Many drivers complained about not being provided with PPE by the platforms to isolate the front of their car from customers in the back.[17] As with couriers, ridehail drivers who didn't work faced the prospect of going without income, as in the early stage of the pandemic self-employed workers could not access government social protection (furlough) schemes for unemployment which quickly became available to those with employment contracts.[18]

Some platforms were quite explicit about their lack of responsibility for the health and wellbeing of their drivers. Bolt, an Estonian-based multi-mobility platform, initially issued a statement reportedly saying: "Bolt drivers are independent service providers who use our platform. Therefore, we cannot offer provisions for drivers who have to take time off sick." The platform also said that disinfectant was available to drivers "if they wanted them" and that mask were "ineffective, so it makes no sense to distribute them".[19] One week later the company backtracked as media scrutiny increased, offering up some financial help.[20]

One French driver told researchers in March 2020, at the peak of the pandemic:

```
"For my part, I quit working as an Uber driver since yesterday. No
protection, and no solution with regard to our safety. I'm in contact
all day with customers. I have 3 children at home, I can't afford to get
sick."[21]
```

The French study surveyed workers across the platform economy and found that 56% stopped working during lockdown. There was a 28% drop in income on average, a dramatic financial consequence of either getting sick or fear over the possibility of getting sick at work.

Home care workers also suffered greatly during the pandemic, since they were working in other people's homes and typically with elderly people, the demographic most vulnerable to covid-19. Home care workers therefore suffered a double fear: about contracting covid-19 themselves and bringing it home, but also about spreading the virus to those they were

16 Ben Wray (2020). 'Corona Crisis: "We have to fight for our lives while we're still trying to save other people's lives": Interview with UK medical courier Alex Marshall'. Brave New Europe - The Gig Economy Project.
17 Veena Dubal and Meredith Whittaker (2020). 'Uber drivers are being forced to choose between risking Covid-19 or starvation'. The Guardian.
18 Slavina Spasova et al (ed.), 2021. 'Social protection of non-standard workers and the self-employed during the pandemic'. ETUI.
19 Fairwork (2020). 'The Gig Economy and Covid-19: Fairwork Report on Platform Policies'. Oxford University.
20 Bolt (2020). 'Coronavirus: What measures are Bolt taking?'
21 Bénédicte Apouey et al (2020). 'Gig Workers During the COVID-19 Crisis in France: Financial Precarity and Mental Well-Being'.

caring for. Despite this heightened exposure, many home care workers complained during the pandemic of a lack of PPE and inadequate PPE.[22] A study on home care platforms across six European countries found that the vast majority of the time the client was expected to provided the necessary work equipment, with the platform only expected to provide equipment in three out of 38 cases.[23]

FairWork, an academic-action project on the platform economy, studied 123 digital labour platforms across 23 countries worldwide in April 2020 and found that "many platforms interpret 'wash your hands' less in terms of the virus and more in terms of their responsibilities to their workers".[24]

The study found 53% of platforms said they had distributed disinfectants and 28% had distributed masks, but that many workers at these platforms reported that they couldn't access these provisions. In terms of guidance, what was offered by platforms "rarely went beyond standard public health advice being issued by governments". Just over half of platforms developed a sick pay policy of some form, typically at rates well below the national minimum wage and often designed in such a way which made it inaccessible, such as the need for a doctor's note which was impossible to access during lockdown for those who were isolating.

Fairwork found examples of platforms taking action "to protect customers without safeguarding workers". Some platforms measured the temperature of the workers and shared it with customers, a practise which is an illegal breach of data privacy in the European Union. Other platforms temporarily suspended the accounts of those who were diagnosed with covid-19, a punishment for being sick which was not combined with financial support for those who temporarily lost their source of income.

Of course, covid-19 was an exceptional crisis which took many companies by surprise, not just digital labour platforms. The difference is that most companies employ workers and therefore have a legal responsibility for OSH. Platforms which hire workers on a self-employed basis had no such legal responsibility, leaving workers entirely dependent on the voluntary actions of the platforms they worked for as to whether they got OSH support during the pandemic or not. Perhaps the Fairwork study's most important finding was that none of the 132 platforms studied had made permanent changes to workers' terms & conditions based on the experience of the pandemic, with many going out of there way to emphasise that their covid-19 illness schemes were strictly temporary.

22 Christina Jewett, Shefali Luthra and Melissa Bailey (2020). 'Health workers filed more than 4,000 complaints about protective gear. Some still died'. The Guardian.
23 Francesco Bonifacio and Ivana Pais (2022). 'Landscaping of the home care digital platform with an info-sheet for each platform'. Origami Project.
24 Fairwork (2020). 'The Gig Economy and Covid-19: Fairwork Report on Platform Policies'.

The pandemic only put a magnifying glass on what is the normal situation for gig workers before and since the covid-19 crisis: that they run 100% of the risks when it comes to getting sick. Other cases post-pandemic have confirmed that this modus operandi has not changed.

In Los Angeles fires in January 2025, Uber offered vulnerable residents free trips, but it's drivers received no PPE for wildfire smoke and cannot access compensation for lung damage due to their self-employed status.[25] More broadly, air pollution can cause major long-term health problems for those working out in the open in dense urban environments. In Europe, 98% of people live in areas with air pollution above the levels recommended by the World Health Organisation, with eleven European cities regularly experience air pollution measures four times above WHO recommended levels.[26] Despite this, platforms have taken no known impact assessments or actions to address the dangers of air pollution.

Other systemic illness risks in the platform economy include no provision of protective equipment from sun and heavy rain. Riders who provide their own protective rain jackets may buy poor quality material and not renew it regularly to save money, and many may not buy any protective rain jackets, leaving them at risk of their temperature falling and catching a cold or flu virus.

There have also been reports of riders suffering from dehydration[27] and sunstroke sunburns[28] due to a lack of sun protection equipment and no paid breaks. Over-exposure to the sun increases the risk of short-term sickness and long-term chances of getting skin cancer, damaging your eyes and weakening your immune system.[29] These problems are only set to intensify with climate change bringing more extreme weather, with one study on climate changed and app-based food delivery finding that "the workers are among the world's most climate-exposed demographics".[30]

Finally, there is abundant research on the strong link between job stress and heightened risk of physical illness.[31] While there is no known research specifically on platform work and the propensity to get ill, we know that platform work is associated with high levels of stress, which we will examine in detail in section 2 of this report. It's therefore likely that gig work

25 Ariel Wittenberg (2025). 'Uber Drivers Helped Evacuate L.A.—But Were Left Unprotected'. Scientific American.
26 Rodrigo Menegat Schuinski (2023). 'No clean air in sight: Europe's worst-affected cities'. European Data Journalism Network.
27 Gabriel Ubieto (2022). 'Riders' bajo la ola de calor: "O repartes en las horas de más sol o no ganas nada"' (In English: 'Riders' under the heat wave: "Either you distribute during the sunniest hours or you earn nothing."'). El Periodico.
28 Jorge Andreu (2024). 'Los 'riders' sufren ante las altas temperaturas en Zaragoza: "Eran las dos de la tarde, había más de 40 grados y acabé desmayado"'. In English: 'Riders suffer from high temperatures in Zaragoza: "It was 2 p.m., over 40 degrees, and I ended up fainting."' El Periódico de Aragon.
29 Johns Hopkins Medicine (accessed 2025). 'Sun Safety'.
30 Anh Ngoc Vu and Loc Duc Nguyen (2024). 'The gig economy: The precariat in a climate precarious world'. World Development Perspectives 34(6):100596.
31 For example see, Anna-Maria Hultén, Pernilla Bjerkeli and Kristina Holmgren (2022). 'Work-related stress and future sick leave in a working population seeking care at primary health care centres: a prospective longitudinal study using the WSQ'. BMC Public Health.

increases the likelihood of physical illness compared to standard jobs, though this has yet to be proven.

c) Ergonomic risks

Ergonomic risk factors are the physical postures and positions that workers typically have while working which may cause musculoskeletal disorders in the short and/or long-term. Postures and positions which cause discomfort are a sign of poor ergonomics.

The ergonomics of food delivery have been repeatedly shown to be damaging to workers' health, primarily due to the heavy back-packs that couriers have to wear but also sitting in one position for a long time and body vibrations. One study of 425 food delivery couriers found that 56% suffered from short-term pain, with problems affecting the lower back (49.18%), upper back (39.53%), neck (28.71%), and shoulders (26.12%).[32] Riders report having to leave the industry due to fear of developing chronic back pain.[33]

Couriers in grocery delivery have reported particular problems due to regularly having to take very heavy weights on their back. Riders at grocery delivery platform Gorillas (now owned by Getir) in Berlin were not supposed to carry weight over ten kilos but had to campaign to pressure the company to provide a weight to measure the bags.[34] One survey of Gorillas riders found that 50% said fear of long-term back-pain was their primary concern.[35] Riders in Vienna are not supposed to take weights of more than 7 kilograms on their back, but screenshots taken by riders have revealed weights sometimes as much as 20 kilograms, drawing concern from Austria's Labour Inspectorate and Chamber of Labour.[36]

The French Anses study found that prolonged bicycle use "causes pressure, friction, or repeated microtrauma in the perineal and pelvic areas, is likely to cause local health effects (skin, subcutaneous tissue, bones, nerves), as well as urological and genital disorders". Musculoskeletal problems for riders include "all joints", including "in the spine (cervical, dorsal, and lumbar), shoulders, upper limbs, and hands, or knees and feet." Symptoms are "mainly muscle pain and contractures, numbness or dysesthesia, particularly in the hands, and tendinopathies".[37]

Platform home care workers, especially those engaged in elderly and disability care, are also highly susceptible to musculoskeletal disorder due to the need to move people around, often

32 Benson et al (2025). 'Factors and prevalence of musculoskeletal pain among the App-based food delivery riders in Tamil Nadu: a cross-sectional study'. Discover Social Science and Health, Vol, article number 14.

33 Ben Wray (2025). 'Building Solidarity in Europe's Gig Economy'. Plough.

34 Ben Wray (2021). 'The Gorillas Revolt: Interview with Zeynep Karlıdağ'. Brave New Europe - The Gig Economy Project.

35 Gabriel Geiger (2021). 'Riders for Europe's Delivery "Unicorn" Report Grueling Delivery Times and Back Pain'. Vice.

36 Speech by Robert Wasalinski at a European Trade Union Confederation event on health & safety in platform work in Dublin, Ireland, 19 June 2025.

37 Anses (2025). 'Livreurs de repas des plateformes numériques'.

without the sort of assistive equipment that you would find in a residential care home. For example, bathing someone in a bathroom that is not prepared for assisted living can lead to home care workers suffering from back pain or even having an accident due to slippery surfaces. This can be dangerous for both the worker and the recipient of care. One study found home care workers are three times as likely to suffer from musculoskeletal disorders as residential care workers.[38]

For remote platform workers (those who can do platform work from anywhere via their personal computer or smartphone) on platforms like Freelancer[dot]com and UpWork, ergonomic risks come from sitting in the same sedentary position for a long-period of time, repetitive movements and, if the workstation is not ergonomically-optimised, bad posture. This can lead to musculoskeletal disorders involving the lower back, neck, shoulders, arms, hands and wrists.[39] Indeed, musculoskeletal disorders are now considered the most common cause of occupational illness in Europe.[40]

The above ergonomic risks for on-location and cloud platform workers are similar to those in standard jobs in these sectors, but the fact that many platform workers are (bogus) self-employed has a major effect on how these risks are managed.

Training and equipment to optimise ergonomics can make a major difference to health outcomes.[41] A whole industry now exists for improving the ergonomics of computer workers, with companies investing in specialised chairs, mouse pads, mouses, keyboards, computer stands, document holders, chairs, under-desk footrests and more,[42] knowing that if they don't invest in these tools it may cost them in the long-term through absenteeism.[43]

However, because (bogus) self-employed workers have sole legal responsibility for their OSH, the responsibility to manage ergonomic risks falls squarely on their shoulders. Most platform workers are not educated on ergonomic health risks, don't receive training or can't afford to invest in the equipment they need for optimal ergonomics, all of which raises their susceptibility to musculoskeletal disorders significantly higher above that of employees.

---

38 Paulo Carneiro, Ana Cristina Braga and Mónica Barroso (2017). 'Work-related musculoskeletal disorders in home care nurses: Study of the main risk factors'. International Journal of Industrial Ergonomics, Vol 61, 22-28.
39 EU-OSHA (2022). 'Musculoskeletal disorders and telework'. OSH-Wiki.
40 Eurostat (Accessed 2025). 'Occupation Disease Statistics: Development of occupational diseases – total and groups, EU, 2013-22'.
41 Maria Gjini and Tara L. Diesbourg (2025). 'Evaluating the efficacy of an educational ergonomics training module on improving positioning during the performance of venipuncture in phlebotomists'. Human Factors in Healthcare, Vol 7.
42 Erica Ogg (2022). 'The Essential Ergonomic Gear for Your Home Office'. New York Times.
43 Neville A. Stanton and Christopher Baber (2003). 'On the cost-effectiveness of ergonomics'. Brunel University.

d) Violence

A major issue facing ridehail drivers is customer abuse, up to and including physical violence. One study found that abuse and violence from customers is "widespread".[44] Recorded events of physical violence include being punched on the back of the head, having food thrown at them,[45] being pepper-sprayed,[46] being sexually assaulted[47] and even killed.[48] One union-organised survey in the US found two-thirds of drivers felt their safety was at risk.[49] Many drivers have taken to setting-up cameras in their cars to record everything that happens and take footage to the police if necessary, while others have been known to carry weapons including knives and firearms to protect themselves.[50]

Drivers hired as independent contractors are largely left to their own devices by the platform when it comes to protection from customer violence. Furthermore, customer ratings mean that drivers have an incentive to tolerate customer behaviours that they wouldn't normally accept to avoid bad ratings, as not doing so can affect their ability to access work in the future. One study cited drivers being unwilling to tell customers to stop drinking alcohol for fear of a bad rating.[51]

Cancelling a trip because of a safety concern can also lead to workers being punished by the platform either through de-activation or being offered less trip requests via the algorithm's internal rankings. Due to the widespread use of automated forms of communication, the difficulty for workers in being able to communicate with a human-being at the platform about a safety concern has also been cited as a risk.[52]

Under pressure from drivers, some digital labour platforms have established safety policies. Uber has installed an emergency button on the app which connects drivers to emergency services, where they can share their GPS location and vehicle details.[53] There is now also the ability to rate customers from 1 to 5,[54] although it's not clear what Uber does with this information and what is the cut-off point of bad ratings for a customer to be de-activated from the app. ID is required when customers are using an untraceable form of payment. But

44 Michael David Maffie (2020). 'The Perils of Laundering Control through Customers: A Study of Control and Resistance in the Ride-hail Industry'. ILR Review, 75(2), 348-372.
45 CSAT.AI (updated 2022). 'Uber Banning Bad Customers: Is that Good Customer Service?'
46 Kemberley Richardson (2024). 'Uber driver speaks out after being pepper sprayed by passenger'. ABC.
47 Michael Sainato (2019). 'Female drivers feel abandoned by Uber and Lyft after reporting a sexual assault'. The Guardian.
48 IWGB (accessed 2025). 'Gabriel's Campaign for Driver Safety'.
49 Strategic Organizing Center (2023). 'Driver danger: How Uber and Lyft create a safety crisis for their drivers'.
50 Michael Maffie (2022). 'Laundering control through customers: customer abuse in the gig economy'. Work In Progress.
51 Michael David Maffie (2020). 'The Perils of Laundering Control through Customers: A Study of Control and Resistance in the Ride-hail Industry'.
52 Strategic Organizing Center (2023). 'Driver danger: How Uber and Lyft create a safety crisis for their drivers'.
53 Uber Poland (2023). 'The emergency button – where to find it, how to use it'.
54 Uber (accessed 2025). 'Prioritizing safety while driving with Uber'

many unions have argued that these measures do not go nearly far enough.[55]

The risk of assault from customers are similar in app-based food delivery. One Scottish study found 55% of food delivery couriers had experienced physical abuse, with 81% feeling unsafe at work.[56] A UK-wide survey found 20% of riders had been assaulted or attacked. Out of those who had experienced safety issues, 73% said they had not reported it to the platform because they thought it would make no difference. Out of those who did report it to the platform, 67% of the time the platform took no action, while 22% of those who informed the police did not receive any help.[57]

Another group of platform workers at significant risk of physical violence are home care workers. Working in the private sphere of someone else's home increases the risks of abuse going uncovered, especially since the vast majority of home care workers are women. One study spoke to female workers had been the subject of "sexual-based scams", where a client has hired them to get them to come to their home under false pretences.[58] Once again, customer rating systems increase the vulnerability of home care workers to abuse. Another report by the European Agency for Health and Safety at Work on platform work in the health and social care sector found that "attention to prevention and management of OSH risks is almost absent in digital platform work, and only few examples of actual measures and practices exist".[59]

Finally, we should also consider the role of verbal abuse and harassment of platform workers, which while it may not lead to outright violence does generate the feeling of being unsafe. The Scottish study mentioned above found 100% of female food delivery couriers surveyed had experienced sexual harassment at work.[60] A 2023 Fairwork study on gender and platform work globally found that for women, platform work "is characterised by an abiding sense of fear and uneasiness". The study found that just 81 of 441 platforms analysed could "evidence that meaningful anti-discrimination policies are implemented".[61]

55 For example see IWGB (accessed 2025), 'Gabriel's Campaign for Driver Safety' for detailed driver safety proposals.
56 Pedro Mendonca, Anastasios Hadjisolomou and Nadia Kougiannou (2024). 'Fair Gig Work in Scotland? A Review of Employment Practices in the Scottish Food Delivery Work'.
57 Focus on Labour Exploitation (2021). 'The gig is up: Participatory research with couriers in the UK app-based delivery sector'.
58 Valeria Pulignano et al (2023). 'Informal employment on domestic care platforms: a study on the individualisation of risk and unpaid labour in mature market contexts'. Transfer: European Review of Labour and Research, 29(3), 323-338.
59 Karolien Lenaerts et al (2024). 'Digital platform work in the health and social care sector: Implications for occupational safety and health'. European Agency for Safety and Health at Work.
60 Mendonca (2024). 'Fair Gig Work in Scotland?'
61 Fairwork (2023). 'Gender and Platform Work: Beyond Techno-Solutionism.' Oxford, United Kingdom; Berlin, Germany.

2. Psycho-social risks in the platform economy
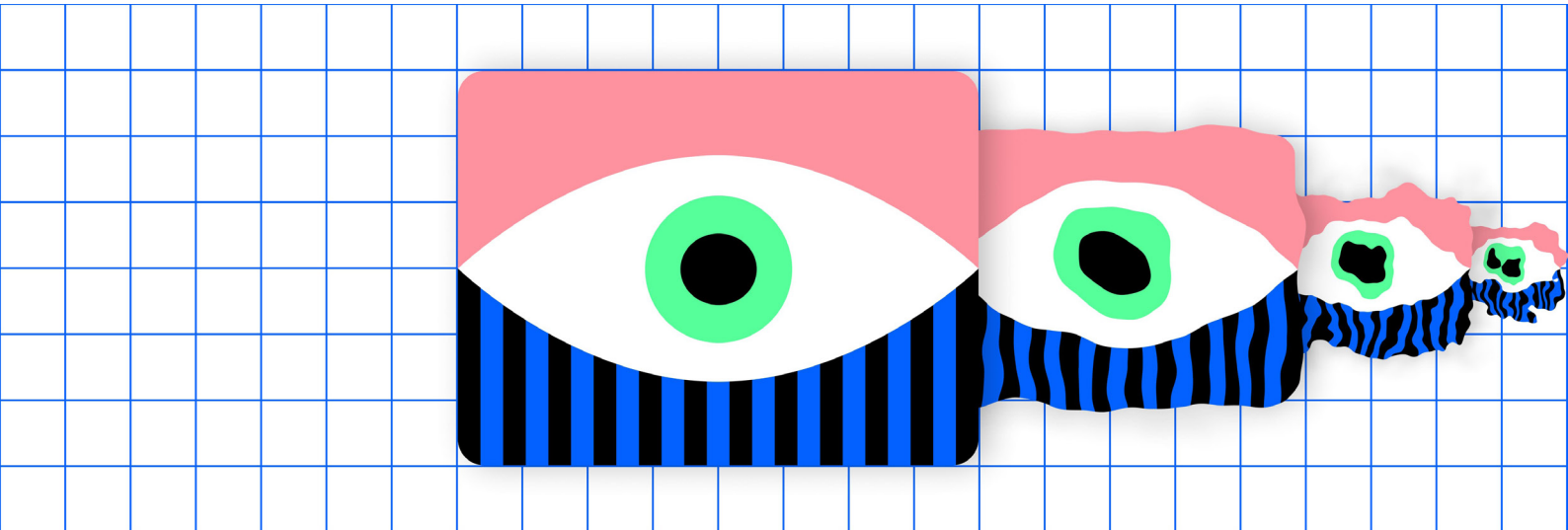
Psycho-social risks refer to psychological stressors which can be caused by an unhealthy working environment, potentially generating both mental and physical problems for the worker.[62] The ILO finds that: "Anything in the design or management of work that increases the risk of work-related stress can be understood as a psychosocial hazard".[63]

A systematic overview of the literature on psycho-social risks factors in the gig economy by European Trade Union Institute (ETUI) researcher Pierre Berastegui[64] categorises these risks along three lines: physical and social isolation; algorithmic management and digital surveillance; and work transience and boundaryless careers, summarised in Diagram 2 on next page. Let's look at each in turn.

a) Physical and social isolation

The 19th century philosopher Karl Marx identified four forms of worker alienation: alienation from the product of your labour, alienation from the process of labour, alienation from oneself, and alienation from your fellow workers.[65] The evidence suggests platform work exacerbates all four forms of alienation, and the psycho-social risks which flow from that are equally clear.

Working on digital labour platforms is both a symptom and a cause of alienation. Many workers are motivated to work in the gig economy because they find the prospect of not having to

---

62 EU-OSHA (accessed 2025). 'Psychosocial risks and mental health at work'.
63 ILO (2022). 'Psychosocial risks and stress at work'.
64 Pierre Berastegui (2021). 'Exposure to psychosocial risk factors in the gig economy: a systematic review'. ETUI.
65 Karl Marx (1844). 'Economic and Philosophical Manuscripts: Estranged Labour'. Marxists.org.

Work dimensions →	Relevant PSR factors →	Main worker outcome
Gig Work		
Social and physical isolation	Social support	Stress, depression, commitment
	Work-life balance	Stress, exhaustion, depression, burnout, family conflicts, life and material satisfaction
	Professional identity	Anxiety, exhaustion, depression, alienation, boredom, self-efficacy, self-esteem
Work transience and boundaryless careers	Job security	Stress, commitment, burnout, depression, anxiety
	Emotional demands	Stress, anxiety, resentment, poor health, sleep disturbances
Algorithmic management and digital surveillance	Workload	Stress, exhaustion, depression, anxiety, boredom, commitment
	Organisational trust	Stress, burnout, commitment, aggressive and retaliative behaviours
	Power relations	Stress, exhaustion

Diagram 2: A summary of psycho-social risk factors and outcomes
in the gig economy (berastegui, 2021)

deal with the pressure of an office environment and a human boss attractive.[66] But since platform work is typically organised individually with little connection to co-workers and management, what experts call the 'professional isolation' of gig work can exacerbate the alienation which they experience and cause psychological harm.[67]

---

66 Ben Wray (2025). '"Gigification": The Future of Work?'. Green European Journal.
67 Daniel Perlman and Letitia Anne Peplau (Ed. Steve Duck and Robin Gilmour), 1981. 'Personal Relationships in Disorder: Towards a Social Psychology of Loneliness'. London: Academic Press.

I) Workplace social support

Studies have shown that a lack of social connections at work, both with co-workers and supervisors, can make workers feel lonely, excluded and insecure,[68] whereas strong social support is linked to higher levels of mental and physical health.[69] Berastegui splits social support at work into four types: coaching, career mentoring, task support and collegial support (personal issues). In all four categories, platform work is deficient:

- Since there is no human relationships between the platform and the worker and no prospect of career progression, there is no coaching or career mentoring.
- For task support, workers have to contact management through an automated system when they have a problem, and only with great difficulty can they reach a human-being, which makes it difficult to resolve even basic work problems that they face.
- Collegial support only comes through informally established WhatsApp groups and/or union organisation, as platform workers tend to work individually and platforms do not establish any mechanisms for workers to get in touch with one another. Workers are also pitted against one another due to an over-supply of labour on the platforms, increasing individual competitiveness at the expensive of collective solidarity.

"Interactions with co-workers are poorer in both quantitative and qualitative terms compared to traditional jobs," Berastegui finds.

II) Connection to the work

Another aspect of professional isolation is a lack of connection to the work that you are doing. If you do not feel like your work has value or if you do not understand it's value, it can negatively affect psychological well-being.[70] On the other hand, research has shown that workers can cope much better with workplace stress if they feel that their work is meaningful.[71]

This is an especially big problem in microwork (also known as 'clickwork' or 'crowdwork'), where workers complete small tasks such as identifying images in order to train, test and fix AI systems, on platforms like Amazon Mechanical Turk. Microworkers do not know who the client they are working for is or what their work is contributing towards, making it almost

---

68 For example see, Sandi Mann and Lynn Holdsworth (2003). 'The Psychological Impact of Teleworking: Stress, Emotions and Health'. New Technology Work and Employment 18(3):196 - 211. And Hiltraut M Paridon and Marlen Cosmar (2009). 'Psychosocial Impact of Mobile Telework: Results from an Online Survey'. Europe's Journal of Psychology 5(1).
69 Tom Cox, Amanda Griffiths and Eusebio Rial-González (2000). 'Research on work-related stress'. EU-OSHA.
70 S.P.M.G. Bastings (2019). 'The buffering effect of perceived organizational support on the relationship between emotional demands and engagement'. Tilburg University.
71 Peggy A. Thoits (1983). 'Multiple Identities and Psychological Well-Being: A Reformulation and Test of the Social Isolation Hypothesis'. American Sociological Review Vol. 48, No. 2 (Apr., 1983), pp. 174-187.

impossible to derive any sense of purpose from what they are doing. A 2019 study found that microworkers were significantly more likely to suffer from depression than the general population, and even when considering only people of a similar socio-demographic profile they were still twice as likely to have depression.[72] While it may be the case that this type of work attracts people that are already depressed, there are reasons to believe that microwork is likely to induce poor mental health as well, not least because of the proven link between excessive screen time and depression.[73]

III) Work-life balance

A final factor to consider is the impact of platform work on workers' social connections with family and friends. While platforms promote platform work as family friendly due to the much-lauded 'flexibility' in work schedules, this is rendered irrelevant if workers have to work very long hours in order to earn enough money, or if times of peak demand for working hours coincide with when their friends and family in standard jobs have time-off.

Research has shown that independent contractors in Europe are more likely to have work-family conflicts than standard employees,[74] especially when the work is precarious.[75] While these studies are not platform work-specific, there are widespread reports of platform workers regularly working 12+ hours per day.[76] Low pay rates make work-life balance unattainable.

For remote platform workers, a major challenge is a blurring of work and personal life, as both take place in the same space. One study of female remote gig workers found that although many initially turn to the gig economy because of the promise of more flexibility for caring responsibilities, often they find that client demands to work anti-social hours to get tasks delivered as soon as possible means that they end up trying to juggle paid work and caring for children or parents, increasing stress.[77]

b) Algorithmic management and digital surveillance

Platform workers are managed by data-driven algorithms which collect information on

---

72 Yaakov Ophir et al (2019). 'The Turker Blues: Hidden Factors Behind Increased Depression Rates Among Amazon's Mechanical Turkers'. Clinical Psychological Science, 8(1), 65-83.
73 Jon D. Elhai (2017). 'Problematic smartphone use: A conceptual overview and systematic review of relations with anxiety and depression psychopathology'. Journal of Affective Disorders
Vol 207, 1 January 2017, pages 251-259.
74 Anne Annink, L. den Dulk and Bram Steijn (2015). 'Work–Family Conflict Among Employees and the Self-Employed Across Europe'. Social Indicators Research 126(2).
75 Philip Bohle et al (2004). 'Working hours, work-life conflict and health in precarious and "permanent" employment'. Rev Saúde Publica, 38 (Supl): 19-25.
76 For instance see this letter to EU labour ministers by platform work trade unions and worker collectives, (2023). 'Open letter – EU labour ministers: Will you work for us or for Uber?'. Brave New Europe - The Gig Economy Project.
77 Al James (2022). "Women in the gig economy: feminising 'digital labour'". Work in the Global Economy 2(1).

and deliver instructions to workers. As well as managing core aspects of the work process including task allocation and pay, the use of large sums of data allows companies to intensively surveil their workers. Algorithmic management significantly alters the way in which work is organised and the relationship between workers and the company compared to standard forms of work management, and therefore it should be of little surprise that this also has an effect on the psycho-social dimensions of work.

I) Organisational distrust

Perhaps the most obvious way in which algorithmic management (AM) creates psycho-social hazards is the lack of transparency which platform workers have about how the algorithm makes decisions, what data is collected on workers and how that data is used. AM systems have been widely dubbed a 'black-box' due to the unwillingness of platforms to explain the rules which guide them, even on issues as fundamental as why one worker would be paid more or less for the same task as another worker, and why commission rates would change from one hour to the next.[78] This opacity and inconsistency generates distrust among workers towards the company, as in lieu of clear information they quite understandably assume that the algorithm is rigged against them.

The use of dynamic pricing to determine pay rates is just one way in which organisational distrust is manifested in the gig economy. Other specific causes for workers to feel a sense of injustice at how platform work is organised include:

- Pay rates tend to fall over time the longer a worker works on a platform, the exact opposite of what happens in most companies where some form of seniority tends to exist for long-lasting and loyal workers;
- Workers are typically unable to communicate with a human manager;
- Facial ID checks are used and often do not work properly (particularly for black and minority ethnic workers);
- The platform tends to value the customer more highly than the worker, especially in case of a dispute;
- Automated de-activation from the platform without any recourse to challenge a 'robo-firing';
- The significant amount of time at work that goes unpaid.

Studies have associated organisational distrust with higher rates of worker stress, withdrawal and mental illness.[79]

---

78 Robert Booth (2025). "Delivery apps urged to lift lid on 'black-box algorithms' affecting UK couriers". The Guardian.
79 Minna Kivimäki (2003). 'Organisational justice and health of employees: prospective cohort study'. Occupational and Environmental Medicine 60(1):27-33.

II) Work allocation

Workers' health is optimised when their workload is balanced and consistent; not too much but also not too little.[80] But work allocation in the gig economy is allocated based on meeting consumer demand, meaning workload can go up and down significantly, from having no work available (and thus not getting paid) to being overloaded with work. This high level of work variability is common to all forms of platform work.

The Anses study on the food delivery sector in France found that the "atypical schedules" of riders "effects sleep, increases fatigue, and can generate depression and anxiety".[81] Couriers and ridehail drivers also experience "gameified" forms of work allocation where bonuses are given for completing 'challenges' such as five deliveries within an hour, further increasing uncertainty, stress and demoralisation for those who don't reach the target, as well as sometimes problems with addiction as gamification is akin to gambling.[82]

Gig workers also have to make decisions about whether to accept task requests from the platform or not. Workers have a very short amount of time to decide whether accepting a task will be economically beneficial for them, taking into account their costs such as fuel and considering whether holding out for a higher-paying task would be financially worthwhile, or whether they will be punished by the algorithm if they reject too many tasks. Having to constantly make decisions which have a major effect on your income can be highly stressful.

"The negative consequences of too many choices include quantitative overload, demotivation, and job dissatisfaction," Berastegui finds.

III) Power imbalance

A final connection point between algorithmic management and psycho-social risks is the impact AM systems have on power relations between workers and the company. Digital surveillance is used by platforms to tightly control the labour process. Upwork, the cloud work platform, takes time-stamped screenshots of workers while they are conducting a task and has a time-tracker so that clients can monitor the worker's performance in real time. This gives workers very little autonomy in how they carry out a task and significantly increases the sense of pressure which workers feel to finish work quickly.[83] Digital surveillance of the labour process is typical in the case of on-location digital labour platforms as well.

---

80 Ann Pietrangelo (2022). 'What the Yerkes-Dodson Law Says About Stress and Performance'. Healthline.
81 Anses (2025). 'Livreurs de repas des plateformes numériques'.
82 Yali Zhang et al (2025). 'Invisible algorithms, visible outcomes: Roles of emotional labor and work gamification in gigs'. Computers in Human Behavior, Vol 169.
83 Mohammad Amir Anwar and Mark Graham (2019). 'Hidden transcripts of the gig economy: labour agency and the new art of resistance among African gig workers'. Environment and Planning A 52(2).

Also, algorithmic management increases the "information asymmetry" between management and workers, information which is typically used to enhance the capacity of management to dominate the workforce.[84] There is a large amount of research on the dangers of unbalanced power relations for workers' mental health, as workers that are more vulnerable to management diktat have less capacity to exercise their legal rights and challenge unfair treatment. Large power imbalances between bosses and workers has been linked to overwork, sleep deprivation and discrimination.[85]

c) Work transience and boundaryless careers

Labour markets are increasingly defined by significant physical and psychological transience. It is much less typical today than it was 40 years ago to stay in the one company for your whole career. Moving to different businesses, different places and even between different sectors has become normal, requiring workers to adapt mentally to different environments, build 'networks' and accumulate skills and expertise which can impress prospective employers.

I) Permanent precarity

Berastegui divides this transient workforce into two tiers, one upper tier where workers can command decent conditions from employers because they hold skills and expertise which are in high-demand, and a lower-tier where workers are buffeted from job-to-job because they have little power in the labour market and find it difficult to escape permanent precarity. The gig economy includes many workers in this latter group, which opens them up to significant psycho-social risks.

"Gig work is like 'quicksand', trapping individuals in a cycle of financial vulnerability and low-skilled work not allowing them to stabilise their professional and personal life," Berastegui argues.

Platform work is the anti-career, because it typically offers no prospect for skills development nor career progression. Migrant workers are significantly over-represented in the platform economy partly because of its low barriers-to-entry which make it easy to get in to, but it also becomes hard to get out of because low-pay and lack of opportunity for career progress means workers become 'stuck'; they can't take time out of work to invest in their education or training because they can't afford to save money, and at the same time they have invested in a car or an electric bicycle to do ridehail or food delivery work and therefore don't want

---

84 Alex Rosenblat and Luke Stark (2016). 'Algorithmic Labor and Information Asymmetries: A Case Study of Uber's Drivers'. International Journal of Communication 10, 3758–3784.

85 Alex Wood and Mark Graham (2018). 'Good Gig, Bad Big: Autonomy and Algorithmic Control in the Global Gig Economy'. Work Employment and Society 33(1).

to give up on the investment they have made. Researcher Niels Van Doorn has described platform work as being both a "stopgap" and "a trap" for many migrant workers.[86]

II) Job insecurity

At the heart of work transience is job insecurity. Scholars have found that gig work can be considered an objectively insecure form of work due to the lack of employment contracts, the risk of app de-activation, fluctuating consumer demand, high levels of competition from other workers, the effect of low customer ratings on the ability to access work, and a lack of social security protection.[87] This is as true for remote platform workers as those on-location, with one study finding that 43% of cloud gig workers in Europe believed that they were easily replaceable.[88]

The importance of job insecurity as a pyscho-social risk is as much about the fear of losing your source of income as it is about the painful reality if/when it actually happens. Berastegui finds that "there is broad consensus [among experts] that job insecurity is detrimental to both the physical and mental health of workers" and that it is widely considered to be "one of the most important" psycho-social risk factors due to "the central role of employment in a person's life".

Specific health problems which have been linked to job insecurity include depression, anxiety disorders, fatigue and high blood pressure.[89]

III) Emotional labour

Linked to job insecurity is the emotional labour which is involved in platform work. The gig economy is predominantly service sector work, and all service sector work involves an element of performance to clients, which requires to some degree suppressing your true feelings to keep the customer happy. In the gig economy, this performative element is made more high-stakes than in standard jobs because of the role of customer ratings systems, a form of performance evaluation which has a major bearing on the worker's ability to access future work.

---

86 Niels Van Doorn (2023). 'Liminal precarity and compromised agency: Migrant experiences of gig work in Amsterdam, Berlin and New York City', in Immanuel Ness (Ed.) 'The Routledge Handbook of the Gig Economy'. Routledge.

87 For example see William Pieter de Groen et al (2018). 'Employment and working conditions of selected types of platform work'. Eurofound.

88 Mark Graham et al (2017). 'The Risks and Rewards of Online Gig Work At the Global Margins'. University of Oxford: Oxford Internet Institute.

89 Sonia Nawrocka and Agnieszka Piasna (2025). 'Psychosocial hazards at work: impact on workers' health and implications for Europe's sustainable competitiveness, in Agnieszka Piasna, Sotiria Theodoropoulou and Bart Vanhercke (eds.) (2025) 'Benchmarking Working Europe 2025'. ETUI and ETUC.

For example, if a waiter is perceived by a customer to be a bit grumpy, it's possible that client may give the restaurant a bad rating on Google, but that is unlikely to jeopardise the livelihood of the individual waiter in the same way that a bad rating for an Uber driver directly affects their work opportunities.[90] A bad rating is visible to future prospective customers and the it is also used by the platform to determine work allocation through their 'matching' algorithms.

The pressure to perform for customers all the time can therefore be very intense in the platform economy. One driver's description of this pressure is evocative:

'You are not a driver, stop thinking that you are actually a driver. You are a clown. Your job is to entertain people who ride with you, not for the sake of getting a tip, but a stupid 5 stars. The way it works, the moment you get a ping, you drive to the pickup location, and you get to meet this rider who you have to study their personality in few seconds and put the clown face and start to make sure they are comfortable. Also you have to make sure that you accommodate their ideas and views. Your job is not to only take the rider from point A to B, you have to provide water, mint, dance for them and have to put up with their confusing directions for the sake of getting 5 stars. A Virtual Appreciation that meant to keep you on the system. As a clown, you have to please multiple kings, I mean riders. Some of them are impressed, others are not. Some will give you 5, but it would take one who give you 4 to ruin your day.'[91]

Researchers have found that the pressure to perform emotionally at work over a long period of time is linked to psycho-social hazards such as burnout, anxiety, stress and sleep disturbance.[92]

---

90 See Marissa Miller (2020). 'What really happens when you leave your Uber or Lyft driver a bad rating'. Mic. And see Alex Rosenblat et al (2017). 'Discriminating Tastes: Uber's Customer Ratings as Vehicles for Workplace Discrimination: Customer Ratings and Workplace Discrimination'. Policy & Internet.
91 Arvind Malhotra (2019). 'Making the One-Sided Gig Economy Really Two-Sided: Implications for Future of Work'. Edgar Elver.
92 Bo Kyung-Sohn et al (2018). 'The Relationship between Emotional Labor and Job Stress among Hospital Workers'. Journal of Korean medical science 33(39).

3. OSH legislative framework
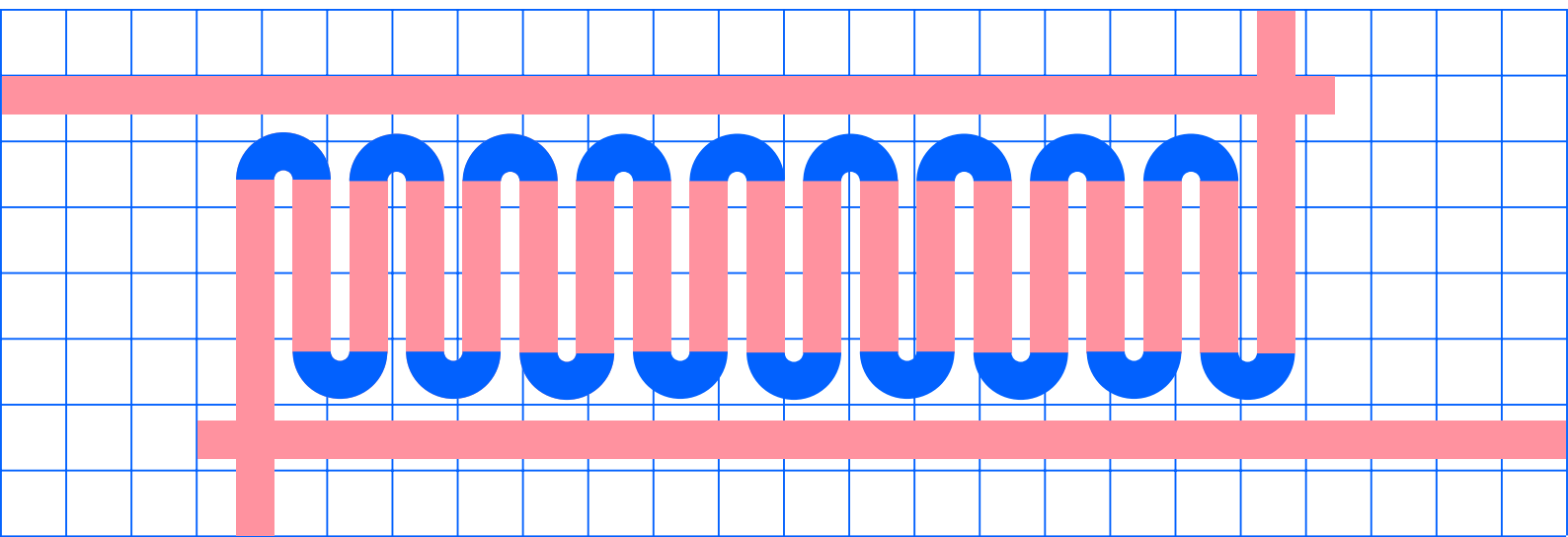
a) EU OSH Framework Directive

The OSH Framework Directive was first introduced in 1989 and established a minimum set of standards for workplace health and safety in the European Economic Community (forerunner to the European Union).[93] The Directive was based around the Independent Labour Organisation's principles for OSH, especially Convention 155 which clarified what constitutes the OSH 'working environment' in the modern context.[94]

The OSH Framework Directive establishes that the employer has a series of legal obligations in relation to their workers' OSH, which in effect means they are mandated to establish an overall health and safety policy in the work setting. Specific employer obligations include:

To carry out an evaluation of all possible OSH risks
Implement measures to optimise OSH protection
To take into consideration the OSH capabilities of workers when they are entrusted with tasks

- To consult workers on the introduction of new technologies in the workplace
- To designate workers who are specifically responsible for OSH protection and prevention

93 European Union (accessed 2025). 'Consolidated text: Council Directive of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work (89/391/EEC)'.
94 Independent Labour Organisation (accessed 2025). 'C155 - Occupational Safety and Health Convention, 1981 (No. 155)'.

- Establish measures and protocols for responding to emergencies, first aid provision etc
- Maintain an up-to-date list of occupational accidents for regulators
- Ensure workers are informed and consulted on OSH risk prevention and protection
- Ensure workers are adequately trained in OSH

Employees also have OSH obligations, including:

- To make correct use of work tools and personal protective equipment
- Immediately form the employer of any OSH danger
- Co-operate with the employer in OSH risk prevention and protection

Self-employed workers are excluded from the scope of the OSH Framework Directive, which only includes "any person employed by an employer". This means that for platform workers who are hired on a self-employed basis (bogusly or otherwise), they are not covered by the collective OSH rights in the OSH Framework Directive described above. This is also true for the majority of OSH legislation at member-state level, with some exceptions and caveats.[95]

The European Agency for Safety and Health at Work (EU-OSHA) has analysed the challenges in applying the OSH Framework Directive in the context of platform work.[96] Their findings are summarised in Table 1 below.

Table 1: Challenges in applying OSH Framework Directive to platform work (EU-OSHA)

Area of OSH management	Relevant article of OSH Framework Directive	Challenges in context of platform work
Conducting a risk assessment	Article 6(3) and Article 9(1)(a)	Digital platforms defer responsibility of risk assessment to digital platform workers. Collective risk assessments are replaced by personalised, individual risk assessments. Virtualisation of work and a lack of a common protective workplace complicates risk assessments. Digital platform workers lack the necessary knowledge and training on how to properly conduct risk assessments.

95 In Bulgaria, Portugal and Italy, the self-employed are included within OSH legislation. In France, Denmark and the Netherlands some OSH provisions apply to the self-employed. In various European countries, including Sweden, Spain and Poland, the self-employed are covered by OSH provisions when they are working in a shared workspace with employees. There is therefore a varied picture across Europe, but in the main national OSH laws are distinguished by employment classification.
96 EU-OSHA (2021). 'Digital platform work and occupational safety and health: a review'.

Implementing preventive and corrective measures	Article 6(1) and Article 6(2)	Digital platforms defer responsibility of the implementation of preventive and protective measures to digital platform workers. The prevention dimension is often poorly taken into account, with compensation and efficiency of the tasks performed being prioritised. Collective measures are marginalised in digital platform work, with digital platforms intermediating on-location services often limiting themselves to the provision of PPE to digital platform workers.
Providing information to workers	Article 10	Although digital platforms are in constant contact with digital platform workers through algorithmic management, OSH issues are rarely communicated to digital platform workers.
Consultation of workers	Article 6(3)(c) and Article 11	Digital platform workers are not consulted on OSH issues, mainly because of the lack of representation and collective organisation.
Training of workers	Article 12	Digital platforms provide little or no training on safety and health.
Adequate controls and supervision	Article 6(3)(c) and Article 11	Blurred responsibilities between digital platforms, digital platform workers and clients complicate enforcement of OSH obligations. Triangular relationship, virtualisation of work, dispersed and diverse workforce and high turnover of labour complicate enforcement by labour inspectorates

As Table 1 shows, the designation of platform workers as independent contractors means that the platforms outsource responsibility of OSH to the worker themselves, but the worker typically has little capacity to carry out OSH risk assessment, protection and prevention measures on their own. Indeed, research with Nordic platform workers aged 18-30 found that they "rarely experience themselves as being self-employed and assume that the platforms take care of OSH", concluding that the young platform workers "are not aware of the formal rights and obligations that are relegated to them."[97]

(Bogus) self-employed platform workers have the responsibility for OSH without the capacity

---

97 Mette Lykke Nielsen, Cæcilie Sloth Laursen and Johnny Dyreborg (2022). 'Who takes care of safety and health among young workers? Responsibilization of OSH in the platform economy'. Safety Science, Vol 149.

to act on that responsibility. As EU-OSHA write elsewhere, the question of employment classification is therefore "the main challenge to be addressed" when it comes to platform workers' OSH.[98]

Platform work researcher Aude Cefaliello has pointed to Article 3 of the OSH Framework Directive, which defines an employer as anyone who "has responsibility for the undertaking and/ or establishment". Based on this definition, Cefaliello finds that "regardless of the workers' status for other labour rights, the platform should be responsible for OHS prevention because it is the only entity with the means, control, and powers to collectively organise work and effectively to prevent risks at work".[99]

Other issues identified by EU-OSHA include that platforms take little initiative around issues such as training and providing OSH information to platform workers, that collective consultation of workers usually isn't relevant because unions are either not present or not recognised by the platforms, and that platforms take little notice of the need for prevention measures in relation to OSH.

b) OSH platform work legislation and initiatives at national level

EU-OSHA finds that among EU member states "few regulations, policies, strategies, programmes, initiatives and actions are directly related to OSH" in the platform economy. Specifically, legislation targeting OSH in the platform economy has been "largely non-existent".[100] Nonetheless, there are some developments at national level that are worth taking into account.

I) Accident insurance

In France, the El Khomri law in 2016 required digital labour platforms to provide insurance against accidents and occupational disease for all self-employed workers who work on their platform.[101] In Italy, the Rider Decree in 2019 provided a public insurance coverage for all riders after the first four days of an injury (which are covered in full by the platform).[102] Since then, some of the largest platforms in the transport sector like Uber and Deliveroo have voluntarily introduced accident insurance coverage in many EU countries (these insurance schemes

98 EU-OSHA (2021). 'Digital platform work: occupational safety and health policy and practice for risk prevention and management'.
99 Aude Cefaliello (2023). 'An Occupational Health and Safety Perspective on EU Initiatives to Regulate Platform Work: Patching up Gaps or Structural Game Changers?' J Work Health Saf Regul; 1; 117-137.
100 EU-OSHA (2021). 'Occupational safety and health in digital platform work: Lessons from regulations, policies, actions and initiatives'.
101 ETUC (2022). 'Platform Reps – France: Country Report 2022'.
102 Beatrice Elerdini (2019). 'Tutele per i Rider e crisi aziendali, che cosa prevede il decreto legge 101/2019' (In English: 'Protections for Riders and corporate crises, what does Legislative Decree 101/2019 provide'). InnovationPost.

typically do not cover illness).

Analysis of the insurance schemes of self-employed riders at Glovo and Uber Eats versus those who are employees at Just Eat in Spain shows that the insurance coverage of employees is significantly superior to that of the self-employed, as Table 2 shows below.

Table 2: Accident insurance of food delivery couriers in Spain (2003)[103]

	Duration of the insurance coverage	Duration of medical expenses coverage	Compensation from being unable to work	Medical expenses coverage	Total disability payment	In case of death
Glovo self-employed (Insurance covered by Qovor)	From the start of a delivery to one-hour after the completion of a delivery	30 days after the accident	€40 per day, for 30 days, from the fourth day	Up to €5,000	Up to €50,000	€50,000 (Orphan's pension: €25,000)
Uber Eats Spain self-employed (Insurance covered by Allianz Partners)	Up to 15 minutes after a delivery is completed	Up to 3 months, with at least 24 hours combined of hospitalisation and a €700 payment for inconvenience	€40 per day, for 30 days, from the fourth day	Up to €7,500	Up to €50,000	€50,000
Just Eat Spain employees (covered by Social Security and private insurance)	1 hour before and after the end of a shift	360 days, extendable for another 180, if a cure is expected during this period	100%, based on the previous month's earnings	Fully covered by Social Security	€40,000 to €60,000	€40,000

Just Eat riders are covered by government social security protection and an additional private insurance agreed through a collective agreement between the company and Spanish unions UGT and CCOO,[104] whereas the self-employed riders are covered only by a private insurance. As Table 2 shows, Just Eat riders receive 100% of their salary when they are unable to work

103 Ben Wray (2023). 'Jugarse la vida como rider en Bilbao por cuatro duros y sin amparo legal' (In English: 'Risking your life as a rider in Bilbao for four bucks and without legal protection'). El Salto Diario.
104 Just Eat España, CCOO and UGT (2021). 'Acta de Acuerdo' (In English: 'Minutes of Agreement').

after a work-related accident, while Uber Eats and Glovo offer a fixed compensation of €40 per day for 30 days, starting on the fourth day of the injury, and nothing after that. Furthermore, whereas the duration of medical expenses coverage is just 30 days after an accident for Glovo with a maximum of €5,000 and up to 3 months for Uber Eats with a maximum of €7,500, Just Eat riders are covered for 360 days, extendable by another 180 days if a cure is expected and the expenses are fully covered.

Also, when one reads the detail of Glovo[105] and Uber Eats'[106] private insurance schemes, it becomes evident that although they offer payments of up to €50,000 in case of total disability, in most cases riders won't receive anywhere near the full amount. For example, at Glovo, the "complete loss of elbow or wrist motion" leads to a payment of just €10,000. The "removal of the lower jaw" is just €15,000. These are life-changing injuries and they do not even cover an annual salary. At Just Eat, the minimum amount that will be covered for a total disability is €40,000. The private insurance coverage also do not recognise illness within its provisions, despite the fact that this can also be caused by workplace activity.

In Belgium, the ACV-CSC union has calculated that insurance coverage for self-employed riders can be up to 40 times lower than that guaranteed for salaried workers in the event of permanent disability from an accident. Journalist Piero Valmassoi has also found that Belgian self-employed riders often give-up with the company's insurance compensation process because it is designed to be almost impossible to navigate, with no contact with a human being.[107]

Journalist Laura Carrer has found that many riders have problems accessing the public insurance system in Italy (INAIL) in practise because of bureaucratic confusion between the platforms and INAIL and technical problems. Also, riders are often given less time to recover from injuries than what they actually need.[108] Furthermore, many riders did not report accidents to INAIL either because they are unaware about the insurance coverage or because they can't afford to take days off work.[109]

II) Presumption of employment

In Spain, all food delivery couriers are supposed to be employees since the introduction of the 'Rider Law' in 2021, which established a legal presumption of employment in the food

---

105 Glovo and Qover (accessed 2025). '¿Has sufrido un accidente?' (In English: 'Have you been in an accident?)'.
106 Uber and Allianz Care (2024). 'Resumen de la póliza: Póliza de protección de socios para repartidores de Uber España' (In English: Policy Summary: Partner Protection Policy for Uber Spain Delivery Drivers'.
107 Piero Valmassoi (2024). 'La roue de l'infortune' (in English: 'The wheel of misfortune). AlterEchos.
108 Laura Carrer (2023). 'Così è impossibile contare gli infortuni sul lavoro dei rider' (In English: 'So it is impossible to count the accidents at work of riders'). MilanToday.
109 Laura Carrer (2023). 'Perché fare il rider a Milano sembra il lavoro più sicuro di sempre' (In English: 'Why being a rider in Milan seems like the safest job ever'). MilanToday.

delivery sector, the first of its kind in Europe. The Rider Law stated that "the Law 31/1995 on prevention of occupational risks also applies to platform workers in the delivery sector, obliging platforms to conduct OSH risk assessments, implement risk prevention measures, and consult and inform platform workers on all issues concerning safety and health at work."[110]

However, until very recently,[111] Glovo had refused to employ it's riders, continuing to operate a bogus self-employed model despite the law. Uber Eats still does not employ all of its riders. Consequently riders at these platforms, the two largest in the country, had been unable to access their collective OSH rights in practise.

This highlights the importance of regulatory enforcement actions to ensuring OSH laws are complied with. EU-OSHA finds that Spain's labour inspectorate has been highly active around pursuing bogus self-employment cases and fining platforms for failure to employ their riders. This contrasts with the general picture across the EU, where EU-OSHA has found a dearth of enforcement action by labour inspectorates. Indeed, there is not even a clear awareness of the extent of the problem, as "the number and severity of OSH-related infringements and work-related accidents and diseases" is "mostly absent".

"The Spanish case clearly shows what is lacking in most other Member States: coordinated actions, and the collection of strategic and operational information on the sector as a whole and on the market players," EU-OSHA concludes.[112]

In 2021, a law in the Italian region of Tuscany was introduced which considers self-employed riders to have the same rights as employees for the purposes of OSH.[113] Unions have found that while the law has been a positive, a lack of surveillance and enforcement of the law means that many riders are not able to take advantage of it in practise.[114]

c) The Platform Work Directive and OSH

The EU Platform Work Directive (PWD)[115] was officially passed in December 2024. It has to be transposed into national law by December 2026 at the latest. PWD is split into two

---

110 EU-OSHA (2021). 'Occupational safety and health in digital platform work'.

111 As of 1 July 2025, Glovo has moved to an entirely employee model for riders mainly through sub-contractors, for more information see Gabriel Ubieto (2025). 'Así funcionan las subcontratas que reparten para Glovo: empresarios "traviesos", salarios mínimos y suplantaciones de identidad' (in Engish: 'This is how Glovo's sub-contractors work: "naughty" business owners, minimum wages and identity theft'). El Periodico.

112 EU-OSHA (2021). 'Occupational safety and health in digital platform work'.

113 INAPP (2021). 'Disposizioni per la tutela e la sicurezza del lavoro dei lavoratori organizzati mediante piattaforme digitali' (In English: 'Provisions for the protection and safety of workers organized through digital platforms').

114 This information was provided orally by Mattia Chiosi, organiser of riders in Florence for CGIL Nidil, at an ETUC event on platform work and OSH on 19-20 June 2025.

115 European Union (2024). 'Directive (EU) 2024/2831 of the European Parliament and of the Council of 23 October 2024 on improving working conditions in platform work (Text with EEA relevance)'.

main parts, the first establishing a rebuttable legal presumption of employment for platform workers, and the second establishing new rights in relation to algorithmic management. Both parts are relevant to OSH.

Recital 50 of the text states:

"Council Directive 89/391/EEC16[116] introduces measures to encourage improvements in the safety and health of workers at work, including the obligation for employers to assess the occupational health and safety risks and lays down general principles of prevention that employers are to implement. Automated monitoring and decision-making systems potentially have significant impact on the safety and on the physical and mental health of platform workers.

"Algorithmic direction, evaluation, and discipline intensify work effort by increasing monitoring, raising the pace required from workers, minimising gaps in workflow, and extending work activity beyond the conventional workplace and working hours. The limited learning at work and influence over tasks due to the use of non-transparent algorithms, work intensification and insecurity highlighted above is likely to increase workforce stress and anxiety. Therefore, digital labour platforms should evaluate those risks, assess whether the safeguards of the systems are appropriate to address those risks and take appropriate preventive and protective measures. They should avoid that the use of such systems results in undue pressure on workers or puts their health at risk. In order to strengthen the effectiveness of these provisions, the digital labour platform should make their risk evaluation and the assessment of the mitigating measures available to platform workers, their representatives and the competent authorities."

This clarifies that the OSH Framework Directive, referenced right at the start of Recital 50, is fully applicable in the context of platform work, so far as they are employees. Indeed, Recital 50 makes it clear that improving the health and safety of platform workers is indeed one of the purposes of the Directive. The fact that algorithmic management is referred to as a specific physical and psychosocial health risk reinforces the fact that all aspects of platform work are subject to the OSH Framework Directive's protocols.

On (genuinely) self-employed workers on digital labour platforms, Recital 54 states:

---

116 This is the OSH Framework Directive discussed in section 3 a).

"The rights pertaining to health and safety at work and information and consultation of platform workers or their representatives, which are specific to workers in view of Union law, should not apply to persons performing platform work who do not have an employment relationship. Regulation (EU) 2019/1150 provides safeguards regarding fairness and transparency for self-employed persons performing platform work, provided that they are considered business users within the meaning of that Regulation."

This makes it clear that (genuinely) self-employed workers on digital labour platforms cannot access collective OSH rights. PWD is not a re-writing of OSH, it is simply a clarification of where platform work fits into existing EU OSH legal framework, which as we have explained in section 3 a) is largely designed around employment classification.

The reference in Recital 54 to Regulation (EU) 2019/1150 refers to the P2P Regulation, the EU's first regulation of online digital platforms (not just labour platforms) which sought to establish some minimum standards for "business users" to operate.[117] OSH was not addressed at all within the text of the P2P Regulation. We can therefore conclude that for platform workers who are self-employed, PWD does not change the fundamentals when it comes to OSH: autonomous workers are still primarily responsible for ensuring their own occupational health and safety.

However, PWD does contain a significant innovation in respect to OSH which does have an effect on self-employed platform workers. This is contained within Article 12 of the text on "Safety and Health", which states:

1. Without affecting Council Directive 89/391/EEC and related directives in the field of safety and health at work, with regard to platform workers, digital labour platforms shall: (a) evaluate the risks of automated monitoring or decision-making systems to their safety and health, in particular as regards possible risks of work-related accidents, psychosocial and ergonomic risks; (b) assess whether the safeguards of those systems are appropriate for the risks identified in view of the specific characteristics of the work environment; (c) introduce appropriate preventive and protective measures.
2. In relation to the requirements under paragraph 1 of this Article, digital labour platforms shall ensure effective information, consultation and participation of platform workers and/or their representatives in

---

117 European Union (2019). 'Regulation (EU) 2019/1150 of the European Parliament and of the Council of 20 June 2019 on promoting fairness and transparency for business users of online intermediation services (Text with EEA relevance)'.

```
    accordance with Articles 10 and 11 of Council Directive 89/391/EEC.
3.  Digital labour platforms shall not use automated monitoring or decision-
    making systems in any manner that puts undue pressure on platform
    workers or otherwise puts at risk safety and the physical and mental
    health of platform workers.
4.  In addition to automated decision-making systems, this Article shall also
    apply where they use automated systems supporting or taking decisions
    that affect platform workers in any manner.
5.  In order to ensure safety and health of platform workers, including
    from violence and harassment, Member States shall ensure that digital
    labour platforms take preventive measures, including effective reporting
    channels.
```

It's worth exploring each of these points in turn. Point 1 is a reiteration of what was contained in Recital 50 mentioned above, i.e. that platform workers are entitled to the same rights established within the OSH Framework Directive as any other employees and that PWD does not in any way amend the OSH Framework Directive. Particular emphasis is placed on the risks of automated monitoring and decision-making as it relates to work-related accidents, ergonomic and psycho-social risks, since these are some of the most important areas where risk prevention measures are necessary in platform work (see sections 1 and 2 of this report for more on this).

Aude Cefaliello has found that PWD is the first EU Directive to recognise the impact of algorithmic management on workers' health and safety, as well as being the first to mention "work-related psychosocial risks and pressure at work (which is a psychosocial risk factor) and explicitly stating that both physical and mental health of platform workers should be protected." However, because the Directive does not define psycho-social risks nor place specific obligations in respect to this, it will be down to member-states to determine how to implement these provisions.[118]

Point 2 refers to Article's 10 and 11 of the OSH Framework Directive which establish the right of workers and/or their representatives to collective information and consultation relating to everything to do with OSH, including risk assessments, training and so forth. Articles 10 and 11 also establish that employees and/or their representatives have a right to make proposals relating to OSH, that they are entitled to submit their views to inspection authorities and when employees are carrying out OSH tasks they are entitled to adequate time to do this without loss of pay.

---

118 Aude Cefaliello (2023). 'An Occupational Health and Safety Perspective on EU Initiatives to Regulate Platform Work'.

Point 3 makes it clear that the core aspects of the algorithmic management systems which digital labour platforms use are also included within the purview of EU OSH laws.

Point 4 makes it clear that the scope of OSH provisions is not just those parts of algorithmic management systems which directly affect the worker, such as the matching algorithm which allocates tasks, but anything which informs how the AM system functions, such as internal ranking algorithms. All aspects of AM systems are relevant to OSH.

Point 5 is the novel part of PWD when it comes to self-employed workers' OSH. Digital labour platforms must establish "effective reporting channels" so that workers can inform management about OSH issues they are facing in real time, with violence and harassment mentioned as two such issues (these issues are explored further in section 1 d) of this report).

Recital 51 in PWD explains the thinking behind the reporting channels in more detail:

"Persons performing platform work are exposed, in particular in on-location work, to a risk of violence and harassment, without having physical workplace where they are able to address complaints. Harassment and sexual harassment are liable to have a negative impact on the health and safety of platform workers. With regard to platform work, Member States should provide for preventive measures, including the setting up of effective reporting channels. Member States are also encouraged to support effective measures to combat violence and harassment in platform work and, in particular, to include appropriate channels for reporting for self-employed persons."

We can see from this recital that the reporting channels are designed for "persons performing platform work", which in the parlance of the Directive is any worker on a digital labour platform regardless of their contractual status, employed or self-employed. Consequently, this is the one part of PWD that does include the self-employed in its OSH provisions.

However, what is not clear from this is what digital labour platforms are legally responsible to do when a self-employed worker reports that they are facing or have faced violence or harassment. Since self-employed platform workers are still responsible for their own OSH, presumably the platform is not legally liable if a platform worker suffers violence and/or harassment. The risk therefore is that the reporting channel becomes an empty shell for self-employed platform workers: a mechanism on the app where workers think they will get OSH help from the platform but when they actually go to use the reporting channel they realise they are shouting into the void or receiving tokenistic responses.

We can conclude that the Platform Work Directive clarifies that employment classification holds the key when it comes to OSH in the platform economy. Platform workers have the same OSH rights as any other workers in the European Union, on the basis that they have a rebuttable presumption of employment. Platform workers who are genuinely self-employed will have the same rights as any other self-employed worker in the EU, apart from the fact that they will have a reporting channel to report complains to the platform, but without any legal guarantees that once they have reported a complaint something will be done to address it.

It should be clear from this that employment classification will be critical to OSH in the platform economy in the EU going forward. Given this, it stands to reason that successfully tackling bogus self-employment must be a major objective for European unions when it comes to improving the OSH of platform workers.

d) OSH proposals in the transposition phase of the Platform Work Directive

When the Platform Work Directive is transposed into national law by each member-state, it is possible for national governments to go beyond PWD, which sets the minimum base requirements for each country, not the ceiling. The following are a set of OSH proposals to improve PWD in the transposition phase:

- All platform workers should have collective OSH coverage while they are working for a digital labour platform, regardless of employment status. This would mean it would be mandatory for platform workers to be considered employees for (at least) the application of health & safety provisions. Anses, the French OSH body, has proposed this,[119] as has EU-OSHA.[120]

- In Article 12 on health and safety, specify how the "reporting channels" for platform workers to report abuse and harassment should operate and what sort of response is required from the platforms to address the issues that are reported by platform workers through these channels.

- In Article 7 of PWD on limits to automated monitoring and decision-making, include a prohibition on the app audibly beeping while a worker's vehicle is in motion, to prevent the worker from being distracted. Since all the big digital labour platforms deploy motion sensors via the app, this requirement should not be beyond their technical capacity.

---

119 Anses (2025). 'Livreurs de repas des plateformes numériques'.
120 EU-OSHA (2024). 'Securing safer, fairer conditions for platform workers: key regulatory and policy developments and challenges'.

- In Article 13 on information and consultation, add that the platform should provide any OSH-relevant data to the platform workers' representatives at least once a year so that it can be used for analysis purposes.

- Include a provision that digital labour platforms should require self-employed platform workers to take breaks once the worker has completed a set number of hours of continuous activity on the platform. Again, since the platforms are constantly monitoring platform workers' time spent on the platform, this should not be technically difficult for platforms to do.

- Include a provision requiring on-location digital labour platforms to shut-down activity when extreme weather warnings are issued by the competent authority.

- Amend Recital 24 to make it clear that, without exception, platforms have "joint and several liability" in relation to sub-contractors, which would mean that they have legal responsibility for the health & safety of platform workers employed via sub-contractors.

4. OSH union organising
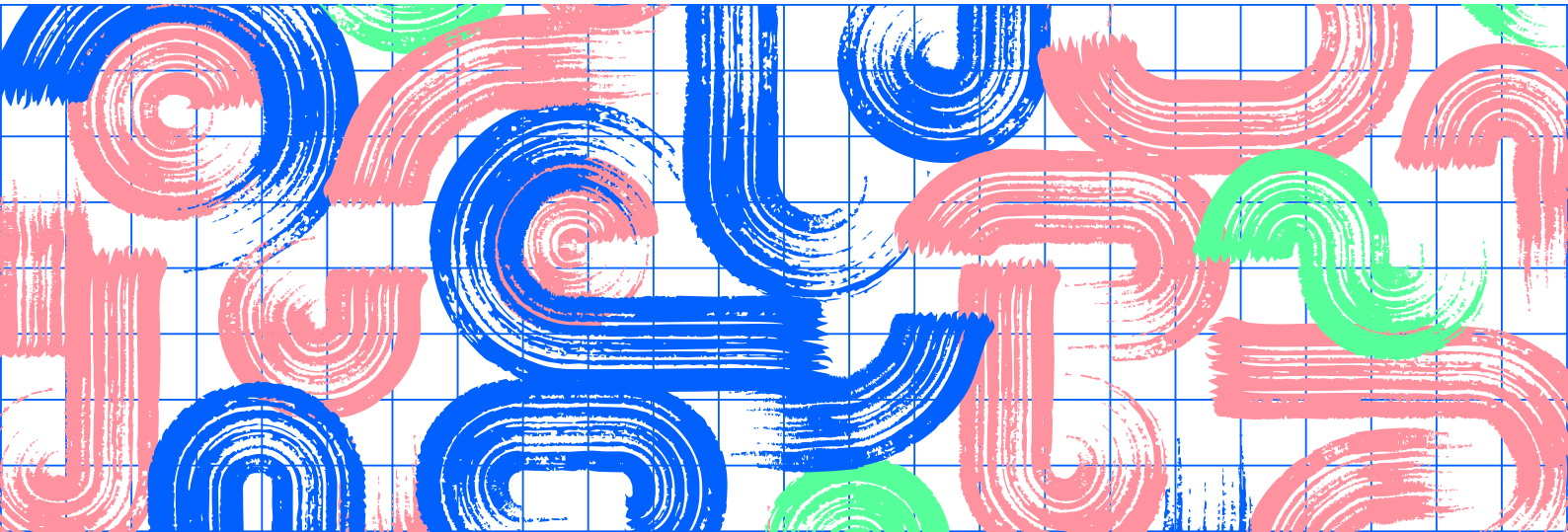
There is a consensus among OSH experts about the vital role of trade unions in optimising workplace health and safety. EU-OSHA finds that "worker participation" is "an essential component of an effective OSH management system", citing various studies showing that "union-trained and union-backed safety representatives are highly effective at improving OSH results".[121]

Even the World Bank, a notoriously pro-business institution, has found that "trade unions can play an important role in enforcing health and safety standards" because "individual workers may find it too costly to obtain information on health and safety risks on their own, and they usually want to avoid antagonising their employers by insisting that standards be respected."[122]

Herbert Abrams, in his book 'A short history of occupational health', concluded that: "Organised labour has been the essential factor central to most workplace health and safety improvements, from the industrial revolution to the present."[123]

The importance of unions to OSH operates at the political and industrial level. Politically, unions have been central to pushing OSH regulatory improvements through parliaments. Industrially, unions have been indispensable in translating these legislative gains into real improvements on-the-ground, acting as the first and primary regulatory enforcer in workplaces. Indeed,

121 EU-OSHA (2021). 'Digital platform work and occupational safety and health: a review'.
122 Manuel Simón Velasco (Ed.), 2002. 'Health and safety at work: A trade union priority'. ILO.
123 Herbert K. Abrams (2001). 'A short history of occupational health'. Journal of Public Health Policy, Vol.22, No.1.

legislation in and of itself is unlikely to make a significant difference to OSH in practise: workers must be actively engaged in making best use of the law.

While wages tend to be the focus when thinking about the purpose of unions, arguably their most important contribution historically has been in the realm of occupational health and safety, since these are matters of life and death. It should be of little surprise that health and safety has been an important driver of union recruitment historically, since what matters more to a worker than their ability to live a healthy life?

Understanding what defines standard union approaches to OSH, and how they could be applied effectively in the specific context of the platform economy, is therefore of critical importance.

a) Standard union OSH approaches

Unions tend to have two or three layers of OSH specific organisation in workplaces: a health & safety representative, a joint health & safety committee between workers and management, and sometimes a union health & safety committee.

I) Health & safety representative

The health & safety rep in a workplace where the union is recognised by the employer is mandatory under EU labour law. Health & safety representatives are entitled to time-off with pay from work duties to carry out their responsibilities, and must undergo training for their role.

The primary responsibility of a health & safety rep is to carry out workplace inspections to make sure that there are no hazards and everyone is working safely and in safe conditions. These regular inspections give the health & safety rep the opportunity to communicate with a wide layer of the workforce, including non-union members, and helps to establish the union as a visible workplace presence.

"An active safety representative is the face of the union in the workplace that workers will see about the workplace on a regular basis," the UK Trades Union Congress (TUC) find in a manual for reps.[124]

Other responsibilities of the health & safety rep include: representing workers when they are meeting with employers on an OSH issue, investigating the causes of accidents, representing

---

124 TUC (2016). 'Health and Safety and Organising: A guide for reps'.

employees in meetings with inspectors, making proposals to the employer, and attending joint health and safety committee meetings.

It's important to bear in mind that the health & safety representative is not responsible for OSH, that is the role of the employer. The role of the health & safety rep is to ensure the employer is meeting their OSH responsibilities and to encourage workers to also comply with OSH standards.

II) Joint health & safety committee

The joint health & safety committee between employer and employees was initially the product of collective bargaining. Today, many EU member-states either write the 'joint committee' into law or take for granted that it is the mechanism by which the employer's requirement to consult the workforce on OSH issues is realised in a union-organised workplace.

The joint committee should have 50/50 representation between management and worker representatives. Its purpose is not to manage OSH in the workplace. Once again, this is the responsibility of the employer. The joint committee makes recommendations on OSH issues, which the employer is not bound to implement but is obligated to respond to. If the employer does not respond to a recommendation and an accident or injury occurs, the recommendation can be used as legal evidence that the company had not done their due diligence to minimise the possibility of injury from hazards.

A strong union should be able to push management to act on the recommendations of the joint committee, so that in practise OSH is co-determined.

"Ideally, no policies or programmes in occupational health and safety should exist in the workplace except those that have the agreement of the [joint committee]," the IndustriALL union federation find in their OSH manual.[125]

Other activities of the joint committee include: analysing injury and illness data, reviewing accidents and inspection reports, developing and improving safety training, and advising on OSH communications. Joint committees are not supposed to handle day-to-day OSH issues, which should be communicated between health & safety reps and line managers, but are instead about dealing with the longer-term, strategic OSH issues facing the work place.

---

125 IndustriALL (2020). 'Saving Ourselves: A basic reference manual for health and safety activists'.

III) Union health & safety committee

The union health & safety committee has no legal status. It is a voluntary institution to get workers together to discuss issues and come up with solutions on OSH.

The union committee can be particularly useful in workplaces with multiple unions present, as a way to coalesce union strategy together, especially before joint committee meetings. The union committee can also be helpful when the union is not yet recognised by the employer or where workers are (bogus) self-employed, to act as a focal point for union activity on OSH.

IV) Union OSH philosophy

In terms of the philosophy of unions towards OSH, union literature emphasises that a combination of strong laws, strict enforcement and active unions are all required to deliver optimal OSH.[126] As IndustriALL find:

"No one approach is enough. We must use every tool in our kit. Joint workplace approaches, social dialogue, political action, good regulations, good enforcement, collective bargaining and industrial action are all necessary. It is not a question of one approach being better than the other. Without a workplace consensus on the need for occupational health and safety excellence, there will never be enough regulation and enforcement to make a difference. Without the laws, however, there is no way to deal with those employers who are unwilling to make a joint approach work."

IndustriALL propose that union action on OSH should be built around three rights:

1. "the right to know - fully - about workplace hazards, and obtain training and education
2. "the right to refuse, or shut down, unsafe work
3. "the right to participate in decision making about health and safety through Joint Committees"

Out of these three rights, emphasis is placed on the latter - union participation - as the best means of ensuring the former two rights are guaranteed.

Furthermore, IndustriALL recommend splitting how unions think about OSH into three aspects: safety system, safety programme and safety audit. The safety system is the overall

---

126 Hazards Campaign (2024). 'A manifesto for a health and safety system fit for ALL workers'.

framework which the company has in place for OSH. The safety programme is what actions are being taken to improve OSH. The safety audit is how progress in OSH is measured. Building union strategy with this structure in mind makes it less likely that mistakes will be made and ensure that OSH progress is a continual process.

OSH can and has been a very important recruitment tool for unions seeking to organise in new workplaces. The TUC points out that even without a recognised union in the workplace, management is legally required to have some means of consulting workers on OSH issues.[127] Asking the employer how they are doing that, and offering to sit on a safety committee if one does not already exist, is one possible way of establishing a presence for the union in the workplace.

Identifying a specific OSH concern and building a union campaign about it can be a very useful way of highlighting the value of union organisation to workers. For example, in jobs where the working environment is too hot, unions have provided thermometers and got workers to test and record the temperature every two hours. The participation of colleagues in this process can help to build a sense of active engagement in union activity.

Other tactics for OSH-focused union campaigns include:

- Carrying out a mapping exercise of workplace hazards;
- Conducting a survey of workers on OSH concerns;
- Finding out if a labour inspectorate or local authority has previously carried out a workplace inspection, and if not asking them to do so;
- Establishing a union health & safety committee;
- Holding lunchtime meetings with workers on OSH;
- Organising a petition to present to management around a specific OSH risk;
- Asking the employer for an accident report form after an accident has occurred, which in some countries is a legal requirement to produce.

Two final tactics which are rarer but worth highlighting are roving safety representatives and issuing a union inspection notice.

A roving safety representative can inspect workplaces where they are not formally an employee. This can only be done with the consent of the employer, but the employer may be willing to accept that unions do this either in the context of collective bargaining or because they think their interests lie in optimising OSH. Roving safety representatives are particularly interesting in the context of sub-contracting, where workers are doing ostensibly the same

---

127 TUC (2016). 'Health and Safety and Organising: A guide for reps'.

job but OSH standards can differ because they are split across various sub-contractors.

A union inspection notice is a formal notice issued to a manager by a health & safety rep. It states that the union believes OSH requirements are not being complied with, states what should be done to fix the problem and gives a date by which time action should be taken. A union inspection notice is not a legal instrument (only government regulators can issue legal enforcement mechanisms) but it is a way of warning the employer that the union won't stand by if they do not act to fix problems. It is a tactic that can be used when the normal mechanisms of resolving issues through collective negotiation are failing.

b) Experiences of union OSH organising in the platform economy

The obvious constraint on applying the union approaches outlined in section 4 a) to the platform economy is the (bogus) self-employed status of most platform workers. As we have explained in section 3 a) of this report, self-employed workers are usually legally responsible for their own health & safety and therefore do not have access to the forms of collective representation which we have explored in section 4 a).

In 2022, the European Commission clarified it's guidelines on collective bargaining of self-employed workers, finding that self-employed workers could collectively bargain if they are in "a situation comparable to workers" including providing "services to or through a digital labour platform".[128] Specifically, the guidelines state that "health and safety" is included within the scope of what these dependent self-employed workers can collectively bargain on.[129]

It is therefore possible for unions to enter into collective agreements with digital labour platforms on OSH while workers are still classified as self-employed. These agreements could include the same access to health & safety reps and a joint safety committee as described in section 4a). However, obtaining sufficient union support amongst self-employed workers that would put them in a position whereby they can achieve union recognition from the platform is easier said than done. Research has shown that self-employed gig workers are much less likely to join a union than employees.[130]

The experience so far in the platform economy on OSH has been a clear divide based on employment status and whether a collective agreement can be secured or not. Platform workers who are employed and covered by a collective agreement tend to have OSH

128 European Commission (2022) 'Antitrust: Commission adopts Guidelines on collective agreements by solo self-employed people'.
129 European Union (2022). 'Communication from the commission Guidelines on the application of Union competition law to collective agreements regarding the working conditions of solo self-employed persons 2022/C 374/02'
130 Leonard Geyer, Kurt Vandaele and Nicolas Prinz (2023). 'Riding together? Why app-mediated food delivery couriers join trade unions in Austria'. Economic and Industrial Democracy, 45(3), 835-858.

considerations specifically written into the agreement (though not in every case), while riders who are self-employed have had to use more informal means to pressure platforms to take action on OSH issues.

I) Collective agreements

The **Austrian 2023 collective agreement with Just Eat** does not include any specific reference to OSH. It refers to the need for traffic accidents to be reported to the employer and for equipment, including bicycle helmets, rain jackets, rain trousers, gloves and overshoes, to be provided by the company "in suitable quality". It also states that wages will continue to be paid for four weeks in case of "inability to work due to illness (accident), accident at work or occupational disease."[131]

The **agreement between Foodora and the Swedish Transport Workers' union** (Transportarbetareförbundet) from 1 May 2023 to 30 April 2025[132] includes:

- Access to sick pay, with a doctor's letter needed after seven days off-sick. The sick-pay is calculated based on the rider's average income for the six months previous.

- Mandatory breaks after a maximum of five hours. The breaks are a maximum of 90 minutes and a minimum of 30. There are guaranteed minimum 11 consecutive hours of rest during any 24-hour period.

- Clothes are provided "for different weather conditions" and for "protective purposes" after a risk assessment is made jointly between the company and an employee health and safety representative. This includes provision of two types of protective footwear (appropriate for both summer and winter). Other equipment provided by the company includes: a bicycle helmet, mobile phone holder, power bank, bicycle lights, reflectors, bell, winter tires and backpack.

- Workers are entitled to leave from work in case of an accident and/or health related issue, including: "sudden serious illness of a close relative living at home"; a "gynecological pap smear, prostate examination and mammography according to a doctor's order"; first visit to a doctor or dentist after an accident; visit to a health care facility after referral by a doctor; when a rider has suffered a workplace injury; and the death of a close relative.

The novelty of this agreement is the broad range of ways workers can get leave from work,

---

131 WKO (2023). 'Collective agreement for bicycle couriers, workers, valid from 1 January 2023'.

132 Transportarbetareförbundet (2023). 'Villkorsbilaga: Cykel Och Mopebud' (In English: 'Terms and Conditions: Bicycle and Moped Delivery').

including reasons that are attentive to the specific health issues of female workers (such as a a mammography).

The agreement between domestic cleaning platform **Hilfr and the 3F union in Denmark**, which is only applicable to employees (some of Hilfr's cleaners' work on a self-employed basis), includes that "employees have co-influence and co-determination on matters concerning health and safety at work". It also states that "Hilfr must ensure a good work environment, job satisfaction and well-being for its employees and must ensure appropriate solutions that reduce the risk of job dissatisfaction". Finally, Hilfr members have access to a "digital local union club" via the Hilfr app which includes being able to elect union health & safety representatives.[133]

The fact that this agreement states explicitly that Hilfr cleaners have "co-determination" in relation to OSH establishes a strong basis for union's to take decisive action. However, the agreement doesn't explain through what mechanisms co-determination will be guaranteed in practise, e.g. a joint health & safety committee. The reference to "wellbeing" in the agreement also points to psycho-social risks being considered as part of overall OSH risks.

The **agreement in Spain between Just Eat and the CCOO and UGT**[134] unions contains a chapter specifically dedicated to OSH. It begins by stating that, as employees, all OSH laws in Spain are applicable to Just Eat riders at all times. It then states that, for the company, OSH is an "absolute priority". Specific measures include:

- Mandatory training in risk prevention which will be "repeated periodically if necessary". The training counts as working time. Training includes: road safety and compliance with traffic regulations, first aid, correct use and maintenance of PPE, identification of potential risks (e.g. weather, traffic) and how to respond to those risks, and a response protocol in case of a serious accident.
- That the company is responsible for all deliveries to be made in compliance with the Highway Code with particular attention paid to road safety.
- That Just Eat will make restaurant partners aware of the need to ensure the safety of riders during waiting times.
- That Just Eat will establish mechanisms so that riders can communicate proposals for improving road safety.
- That PPE will be provided to riders and that it must be replaced whenever "it is no longer suitable for its intended purpose".
- When the company carries out a risk assessment, this should be done with the participation

133 Hilfr and 3F (2024). 'Collective agreement: Hilfr 2'.
134 Just Eat España, CCOO and UGT (2021). 'Acta de Acuerdo'.

of the workers' union representatives and should take account of "psychosocial risks". The risk assessment will pay special attention to working out the maximum weight which is safe for Just Eat riders to carry.

- A medical examination of the riders should be carried out annually and count as paid working time.
- Health & safety representatives and a joint health and safety committee will guarantee the right of workers to participate in OSH. The joint committee will undertake an annual evaluation of OSH.
- The company will provide comprehensive accident insurance for all riders.

The Spanish Just Eat agreement is by far the most comprehensive on OSH in the platform economy so far. Its comprehensive nature means that it could act as a template for other food delivery agreements on OSH going forward.

The 2023 **collective agreement with Just Eat and Italian unions** CGIL, CISL and UIL includes that "the company complies with all current regulations on health and safety at work, carrying out medical examinations of suitability in line with the type of work performed and the means used and subsequent periodic checks on an annual basis."[135]

II) Union campaigns

There are examples of both employed and self-employed riders organising successful campaigns to put pressure on platforms over OSH issues and build the strength of the union.

The **Lieferando Workers' Collective (LWC) Berlin**, which is the majority representative on the Workers' Council in the city, ran a campaign called 'backpacks off our backs'. LWC wants the company to eliminate the use of backpacks due to regular reports of neck and shoulder problems due to the weight of the bags.

The company has refused to implement this change. In response, LWC took its own initiative to provide plastic boxes which the riders can place the backpacks into in baskets on the back of the vehicle.

This campaign has been an important way to increase the awareness of riders about the work of LWC and the Workers' Council and many riders have thanked them for the boxes, as they have significantly reduced muscoskeletal discomfort for many riders.

---

135 Just Eat, CGIL, CISL and UIL (2023). 'Incontro Just Eat Takeaway, CGIL, CISL, UIL 23/02/2023' (In English: 'Just Eat Takeaway, CGIL, CISL, UIL Meeting 02/23/2023').

The 2018 **Bologna Charter**, known formally as the 'Charter of Fundamental Rights of Digital Work in the Urban Context',[136] is a negotiated agreement between Bologna City Council, a workers' collective called Riders Union Bologna, Italian unions CGIL, CISL and UIL, and Italian platforms Mymenu (which is no longer operational) and Sgnam, with Domino's Pizza signing-up at a later stage. The Charter, which was the first municipal agreement relating to OSH in the food delivery sector, is a non-binding agreement, meaning the platforms have signed up to it voluntarily.

The Bologna Charter emerged out of worker sit-in's and strikes in Bologna led by the Riders Union after a period of heavy snow which led many riders to stop work due to feeling like the working conditions were unsafe. The riders, who were self-employed, marched to the city hall to demand the local authority do something about their lack of safety and poor working conditions in general.[137]

The Charter's objective is "to promote safe and dignified employment in the city territory" regardless of the legal employment status of the workers. The OSH-focused aspects of the Charter include:

- Platforms must adopt "all appropriate measures in order to assess, prevent and reduce risks" relating to OSH, regardless of whether the worker is employed or self-employed.
- Platforms must provide accident insurance coverage, including covering the costs of damages to the rider and the riders' equipment, and/or to any third parties.
- Platforms must provision all riders with PPE and safety devices and check that riders are in possession of them.
- The platforms must reimburse "in whole or in part" the cost of maintenance of the work equipment.
- Additional pay when working at night and/or in unfavourable weather conditions.
- In extreme weather conditions, the riders have the right to not perform the work without any penalty from the platform, and the platform should suspend the service
- If a worker is unavailable to work on the platform for a prolonged period, this should not incur any penalty from the platform.

The Charter helped to create pressure for changes at the national level in Italy, including the 2019 accident insurance legislation mentioned in section 3 b) of this report (platforms provided no insurance coverage at the time the Bologna Charter was signed), as well as inspiring similar agreements to the Bologna Charter in other Italian municipalities, including

---

136 Comune di Bologna (2018). 'Carta dei diritti fondamentali del lavoro digitale nel contesto urbano' (In English: 'Charter of Fundamental Rights of Digital Work in the Urban Context').
137 Maurilio Pirone (2023). "Bologna's riders: 'It's not for us but for everyone!'" Social Europe.; https://archivio-notizie.comune.bologna. it/2018/05/firmata-bologna-la-carta-dei-diritti-fondamentali-dei-lavoratori-digitali-nel-contesto-urbano/

Piedmont, Lazio, Milan and Modena.

EU-OSHA analysis of the effect of the Bologna Charter stated that "stakeholders acknowledged the positive difference in working conditions between digital platforms that signed the Charter and the ones that did not."[138]

The obvious limitation of the Bologna Charter was that the big food delivery platforms, Glovo and Deliveroo, ignored the agreement because it was voluntary. Nonetheless, the Bologna Charter is an inspiring example of how self-employed riders can apply pressure and push demands relating to OSH through grassroots action. Specifically, the tactics of Riders Union Bologna show that the use of political leverage at the municipal level can be a valuable tool to do this, reflecting the fact that the workplace of riders is the urban space and therefore OSH is also a matter for local government: if the work is unsafe for riders, it's also unsafe for other workers and pedestrians in the urban space.[139]

c) Union OSH strategy in the platform economy

Unions organising in the platform economy should develop an OSH-specific strategy. A template strategy is summarised in Diagram 3.

The starting point is to have a group of workers who are willing and ready to build union organisation. The union should then seek to get recognition from the platform as the collective representative of the workers.

If the union gets recognition, it can immediately move to negotiating a collective agreement with the platform which takes full account of OSH-factors in the workplace and establishes mechanisms for worker participation. This should come in the form of health & safety representatives (including their right to training and paid facility time to carry out their responsibilities) and a joint health & safety committee made up 50/50 of management and employee representatives. This collective agreement can be struck whether the workers are contracted as employees or self-employed.
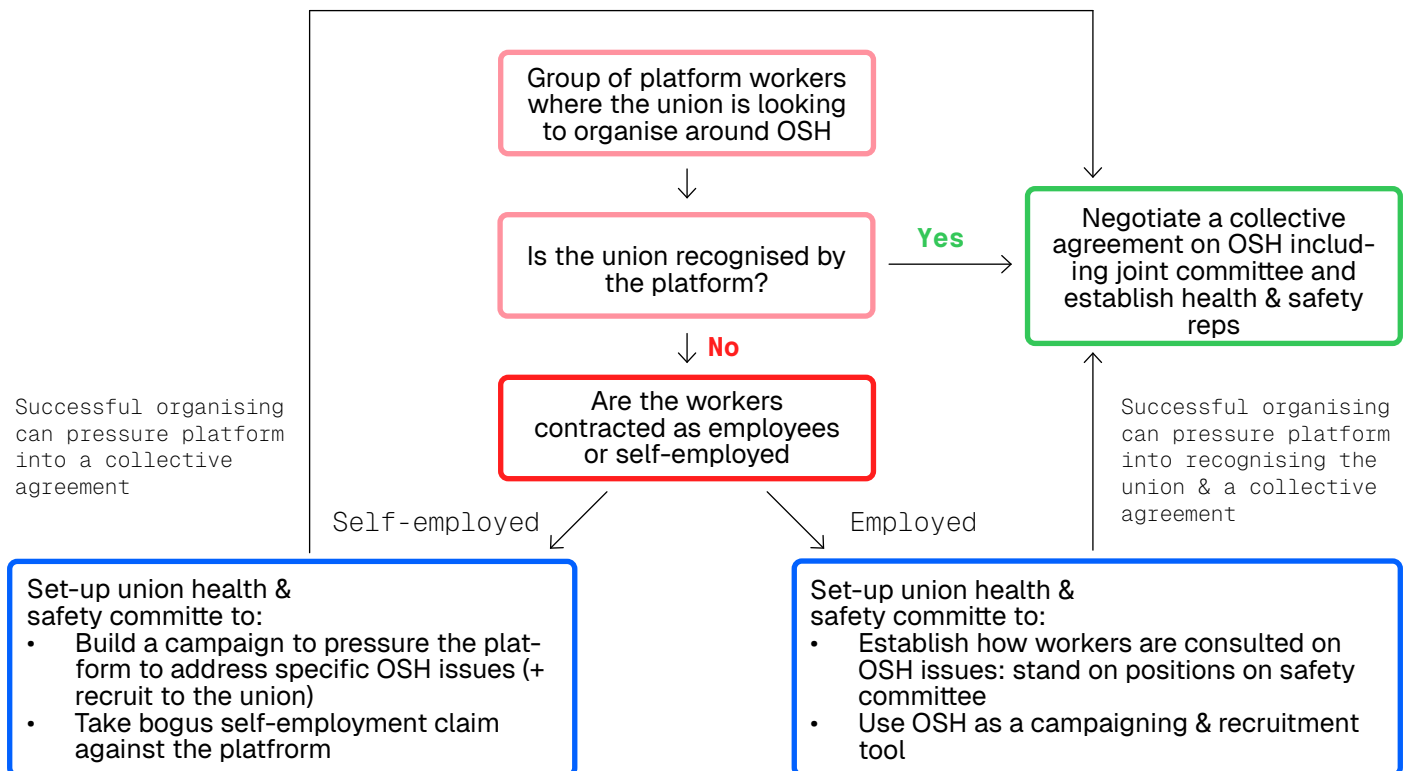
If the platform refuses to recognise the union, the question of employment status then becomes fundamental to OSH strategy. If the workers are employees, the union should establish a voluntary union health & safety committee as a focal point for organising around OSH. This union committee should seek to establish how workers are consulted on OSH issues by the platform, as this is a legal requirement for all employers. If and when

---

138 EU-OSHA (2021). 'Occupational safety and health in digital platform work'.
139 Ben Wray (2023). 'The urban dimension in food delivery struggle: The story of the Riders Union Bologna'. Brave New Europe - The Gig Economy Project.

a company safety committee is established for consultation purposes, the union should seek to gain representation on it. The union committee could also pursue a number of other tactics mentioned in section 4 a), including investigating whether the labour inspectorate has conducted an inspection of the workplace and if not asking them to do so.

Diagram 3: Template OSH STRATEGY IN THE PLATFORM ECONOMY

Group of platform workers where the union is looking to organise around OSH

↓

Is the union recognised by the platform?

Yes →

Negotiate a collective agreement on OSH including joint committee and establish health & safety reps

↓ **No**

Are the workers contracted as employees or self-employed

Successful organising can pressure platform into a collective agreement

Successful organising can pressure platform into recognising the union & a collective agreement

Self-employed ↙ ↘ Employed

Set-up union health & safety committe to:
- Build a campaign to pressure the platform to address specific OSH issues (+ recruit to the union)
- Take bogus self-employment claim against the platfrorm

Set-up union health & safety committe to:
- Establish how workers are consulted on OSH issues: stand on positions on safety committee
- Use OSH as a campaigning & recruitment tool

The union committee can also organise a campaign around specific OSH issues which workers are facing. This can be used both to pressure the platform to take action and as a recruitment tool. Some tactics in such campaigning efforts can include surveys of workers, petitions and lunchtime meetings (more tactics mentioned in section 4 a) above). Through these efforts, the workers can expand the union's presence and significance in the workplace and push the platform for recognition and a collective agreement.

If the workers are contracted on a self-employed basis, they can also establish a voluntary union health & safety committee just like the employees, but the tactics this committee can deploy are more limited. Because self-employed workers usually have no legal right to collective representation on OSH issues, the platform has the right to ignore any demands for institutional representation on behalf of the workers. In that case, efforts have to be concentrated on applying pressure onto the platforms through campaigning efforts to draw the platform to the negotiating table, including potentially seeking to mobilise political

support, as occurred in the case of the Bologna Charter highlighted in section 4 b). These campaigning efforts can also help to increase union membership.

Platform workers contracted on a self-employed basis can also look to change their employment classification. The transposition of the Platform Work Directive into member-state law by December 2026 is likely to make this easier, although many platforms are still likely to resist employment status. By securing employment contracts, it becomes much easier for platform workers to push for OSH protections, including via a collective agreement.

What is common to both employed and self-employed platform workers is the need for union organisation and campaigning activity on OSH to pressure platforms to negotiate agreements on health & safety concerns. This active participation of platform workers around OSH issues should be a key ingredient in union organising in all possible contexts (employed or self-employed, recognised by the platform or not recognised, etc).

5. Conclusion
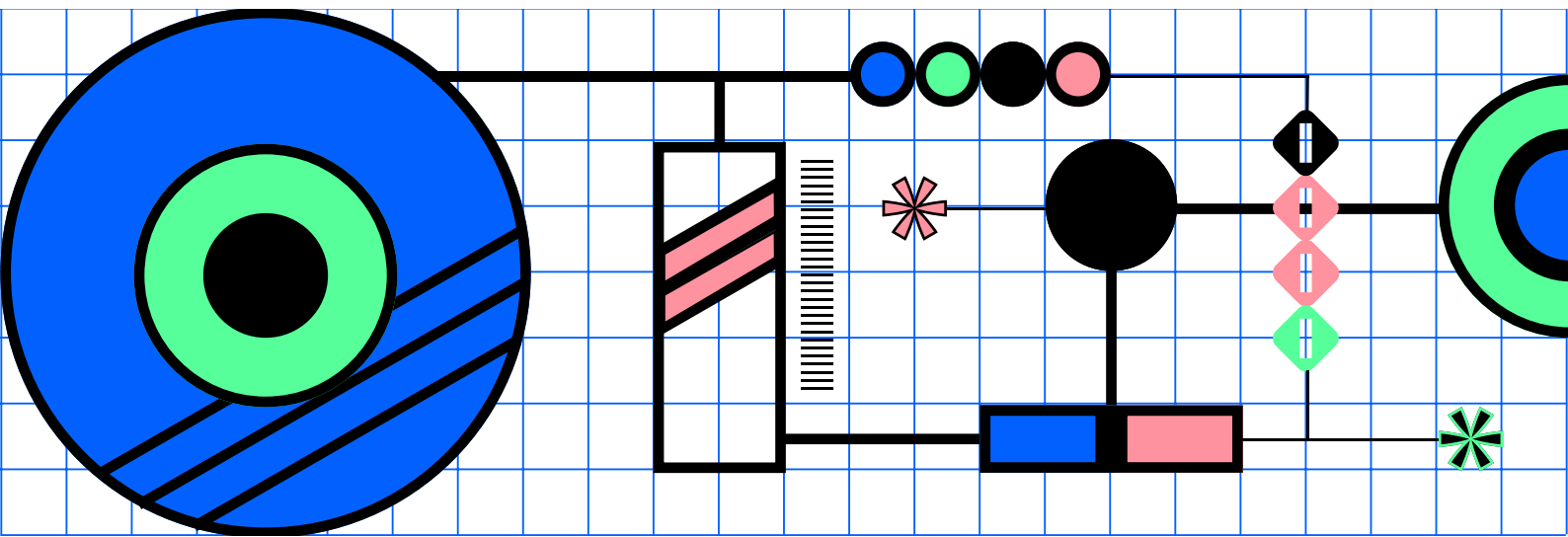
There are three main takeaways from this study:

1. **Risks:** The way in which work is organised in the platform economy significantly exacerbates risks to the health and safety of workers, both in terms of their physical and mental health. A key reason for this is the prevalence of bogus self-employment in the platform economy, but the role of opaque and alienating forms of algorithmic management and systemically low wages are also fundamental.

2. **Regulations:** The regulatory framework for OSH in the European Union establishes a clear binary between employees and self-employed workers. The Platform Work Directive does not fundamentally alter this binary. Consequently, in so far as platform workers are able to secure their rights as employees once PWD is transposed into national law, they will have collective OSH rights like any other employee.

3. **Unions:** The most important mechanism workers have to improve their health and safety at work is strong union organisation. Worker participation in health and safety protection and prevention at the workplace is fundamental to optimal OSH, regardless of what regulations are in place. Nonetheless, the combination of platform workers being employees and being union-organised puts them in a much stronger position to pressure management and ensure stringent OSH protection and prevention measures.

In the 21st century, there is no excuse for any job being dangerous, never mind a whole sub-section of the economy. Just like platform work takes us back to a 19th century system of

piece wages, where workers would turned up at dockyards and didn't know if they would be paid for that day, it also takes us back to 19th century health and safety standards, where unsafe working conditions came with the territory.

The riders, carers, drivers and data labellers of today's platform economy are often in vulnerable position and have no choice but accept that danger comes with the territory. But their unions cant! Achieving a healthy and safe platform economy will only be achieved through a combination of union organisation from below and pressure for regulatory improvements from above, the same combination that Europe's labour movement wielded in the past to make workplace health & safety a right for all workers. To stop the clock being turned back on occupational health & safety, platform workers and their unions need to step forward.

platforum