

Work Package 4 – Deliverable 3

REPORT ON THE COMPARATIVE ANALYSIS OF CASE STUDIES OF SOCIAL ACTORS' INNOVATIVE STRATEGIES

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Funded by DG Employment, Social
Affairs and Inclusion – EMPLA –
Employment and Social Governance
"Improving expertise in the field of
industrial relations –
SOCPL-2022-IND-REL- 01"

Grant Agreement number: 101126007



Co-funded by
the European Union

Social dialogue and innovative social strategies on care and cleaning platforms across Europe

1. Introduction

This comparative report forms part of Work Package 4 (WP4) in the Research Project 'Home Care Digital Platforms and Industrial Relations' (Origami). The Origami project is funded by DG Employment, Social Affairs and Inclusion, European Commission, and it is coordinated by Professor Ivana Pais, Università Cattolica del Sacro Cuore, Milan, Italy. WP4 addresses innovative strategies of social actors (i.e. trade unions, employers' associations, public authorities etc.) in the home care and cleaning sectors to improve the wage and working conditions of platform workers. The work package involves case studies with illustrative examples of novel social partners strategies written by the five project partners (Denmark, France, Ireland, Italy and The Netherlands), which are published in separate national reports (Ilsøe & Bjerre 2025; Ledoux & Teke 2025; Murphy, Ryan & Gibbons 2025; Pais 2025; Hesselink & Been 2025). The aim of this report is to compare the findings from national country case studies and discuss their wider potentials for informing ways to regulate and strengthen social dialogue in these subsectors of the European platform economy. The structure of the comparative report is as follows. First, we present the background for the comparative case study. Second, we define social dialogue and present a typology of initiatives. Third, we describe the used methodology. Fourth, we present five within-case analyses of the individual social dialogue initiatives from Denmark, France, Ireland, Italy and The Netherlands. Fifth, we compare and discuss the findings before we in the last section draw the main conclusions.

2. Background and recent debates within the literature on platform work

Poor working conditions and limited access to social protection among platform workers has been the subject of growing debate (Kalleberg & Vallas 2017; Schor et al. 2020; Piasna et al, 2022; Koutsimpogiorgos et al 2023). Most discussion to date has focused on food delivery and transportation platforms (visible platform workers) (Vandeale & Rainone 2025). More recently, debates have centred on care and cleaning platforms where the invisible nature of domestic work has the potential to deepen the existing labour vulnerability (Ustek Spilda et al. 2022; Marzo, 2023; Mateescu and

Ticona, 2020; Flanagan, 2019). A growing body of literature investigates social dialogue initiatives aimed at improving conditions and protections for platform workers (Jacqueson 2021; Bellini et al 2022; Hadwiger 2022; Ilsøe & Söderqvist 2023; Hiesl 2024). However, there remains a knowledge gap concerning social dialogue around care and cleaning platforms. Workers here are predominantly female and migrants, and they often work alone, which means they are isolated and difficult to organise and thus echo some of the challenges facing the cleaning and care sector more broadly (Murphy et al. 2024; Blanchard et al. 2021; Bonifacio & Pais 2025). But these types of platforms also intersect with a growing public demand for care which might facilitate social dialogue initiatives (Huws, 2020).

3. Industrial relations, social dialogue and neo-corporatism

Our comparative analysis of social actors' innovative strategies to improve the wage and working conditions of platform workers in the subsectors of care and cleaning services in the platform economy is informed by three strands of literature related to social partners and their dialogue.

First, we draw on the employment relations/industrial relations literature, which study among others power relations between managers and employees on the labour market (Clegg 1976; Due & Madsen 1996; Arnholtz and Refslund, 2024; Gooberman and Hauptmeier, 2024, Visser, 2014; Sisson, 2025). A core focus in this theoretical tradition is the asymmetry of bargaining powers between managers and employees, where the managerial prerogative leaves managers with higher bargaining power than employees. Hence, employees have mobilized in unions to attempt to balance the bargaining power between the two sides of industry (ibid.).

In the platform economy, we often find lower union density than in other parts of the labour market such as manufacturing or public services (Kalleberg & Vallas 2017; Schor et al. 2020; Piasna et al, 2022; Koutsimpogiorgos et al 2023). Also, platform companies are rarely members of employer's associations. In addition, the employment status of platform workers remains unclear, leaving many without any clarity as to whether they are to be considered employee or self-employment and they also may be unable to enter collective bargaining either as an individual or group with managers. This creates an asymmetry of power between employers and workers which appears larger than in more organized sectors (ibid.).

When studying emerging negotiations between employers and workers in the platform economy, it might therefore be useful to add a broader theoretical framework that can include early-stage initiatives such as attempts to mobilise workers, granting workers employee status and make companies attain employer

status (Vandeale & Rainone 2025). Hence, we combine the industrial relations perspective with a second perspective, the concept of social dialogue, which includes a wider range of initiatives than collective and individual bargaining. According to the ILO, social dialogue includes all types of negotiations, consultations, participation and information exchange between, or among, representatives of governments, employers and workers, on issues of common interest (ILO 2024). In other words, social dialogue is here characterized by variations in actors, level of formality and output (for which we draw on Easton's (1965) distinction between outputs and outcomes). Using the social dialogue perspective, we aim to include all types of social dialogue initiatives in our case studies – even though they might be in a very early phase. We combine this with the industrial relations perspective, as we see it as important, whether these initiatives include organisation of workers in unions and companies in employers' associations and whether they lead to formal or informal outputs. Organisation and formalisation are processes of institutionalisation, which can support the survival of social dialogue initiatives over time.

Third, we include the perspective of neo-corporatism (Ebbinghaus 2002). This strand of literature studies social dialogue initiatives that involves government representatives and/or as both sides of industry (employers and employees and their representatives) along with government led, employer led or union/worker led initiatives.

Inspired by neo-corporatism, we seek to investigate social dialogue initiatives on three arenas; unilateral (solo initiatives by either government, unions or employers/employers' associations); bipartite (mutual initiatives by unions and employers/employers' associations, including collective agreements) and tripartite (mutual initiatives by government, unions and employers/employers' associations) (Mailand 2008; Ebbinghaus 2002; Ilsøe 2017). We analyse social dialogue initiatives from all three arenas and discuss the actors, processes and implications of each initiative. Here, the levels of formalisation and organisation are key questions, when it comes to evaluate the sustainability of the initiatives and the learning potential across Europe. Through these case studies, we also discuss the potential for social dialogue initiatives to address working conditions for the predominately female workforce, including employment status and wage.

4. Methodology

Our study has an explorative character as social dialogue on care and cleaning platforms is an emerging, but less researched phenomenon with a limited number of examples explored in the existing literature. The illustrative examples are selected by

an information-oriented principle – we pick the most relevant and rich example of a social dialogue on care and cleaning platforms from each country (Flyvbjerg 2006). Case studies are conducted as a combination of desk research (legislation, government publications, collective agreements, policy papers, grey literature etc.) and interviews with representatives with government, unions, employers and workers across the five countries (Denmark, France, Ireland, Italy and The Netherlands forming part of the project).

Interviewees are selected according to relevance for the social dialogue initiative studied. Ideally, all actors involved in the social dialogue processes were interviewed; the relevant actor in case of unilateral initiatives (for instance, government), platform managers and trade unions in case of bipartite initiatives or in the case of tripartite initiatives unions, employers' associations and government in case of tripartite initiatives. We have no cases of explicit tripartite initiatives, although some initiatives might include elements of tripartite consultation. By government, we refer to a government representative from a relevant government body – ministry, public authority, inspection office or similar. By trade union, we refer to a union representative from the involved union or from the most relevant unions (if not explicitly involved). On the employer side, platform managers and representatives from employers' associations have been interviewed. In addition, other relevant informants depending on the type of the initiative were interviewed, for example workers or cooperatives (see Table 1 for an overview).

The interview guides included questions on the type of social dialogue initiative (legislation, agreements etc.), the content of the initiative and the issues addressed, the platform/platforms covered, which key actors who were involved in the process, where negotiations took place, the final outcome, the implementation and effects (if already evaluated).

The strategy of analysis in WP4 was divided in two processes. First, each national team analysed their material and wrote a national case study report. For further detail, see the five individual national country reports: Ilsøe & Bjerre 2025; Ledoux & Teke 2025; Murphy, Ryan & Gibbons 2025; Pais 2025; Hesselink & Been 2025. Second, each case study was analysed individually to understand the specific national context, and the dynamics of social dialogue in relation to platform work in the care and cleaning sectors. This within-case analysis served as a foundation for the subsequent cross-case comparison, which explored how social dialogue initiatives – or lack thereof – address issues of working conditions for platform workers, including the contextual- and initiative-specific factors that act as enablers or barriers. Analytical memos produced during the initial reading of the case studies informed the structure of the within-case analyses, while further memos developed during this stage contributed to the construction of the analytical framework used for the comparative study. Below

we present an overview of the six cases included in the comparative case study (Table 1):

Table 1: Overview of cases and interviews

Country	Case	Sector	Focus	Interviewees
Denmark	Hilfr	Cleaning	Collective agreement (bipartite)	Platform Manager Workers Union Government (Total of 5 interviews)
France	Right to occupational health	Cleaning + Care	State-led regulatory reform implemented via collective agreements (unilateral + bipartite)	Government Employers' associations Provider federation Unions Workers (Total of 8 interviews)
Ireland	None	Cleaning + Care	The absence of social dialogue (tripartite)	Government Employers' association Unions Worker's rights organisation Cleaning company (Total of 10 interviews)
Italy	The Family Assistant project	Care	Municipal initiative for formalising platform care work (unilateral)	Municipality Cooperative (training provider) Platform provider Labour agency Unions Workers (Total of 11 interviews)
The Netherlands	Helping	Cleaning	Union-led court case (unilateral)	Unions Platform

				(Total of 3 interviews)
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5. Social dialogue initiatives in five countries

Before turning to the comparative analysis of social dialogue initiatives in care and cleaning platforms, we first present within-case analyses from the six countries included in the study. While the initiatives vary considerably in scope, form, and outcome, the analyses follow a common analytical framework. For each case, we examine the conditions under which the initiative was introduced, the dynamics that shaped its development, and the ways in which contextual factors influenced its outcomes and posed specific challenges.

Specifically, for each of the within-case analyses follow a similar structure: After a brief introduction to the case, the institutional framework of labour market regulation is presented (1), followed by a discussion of the regulation of digital labour platforms (2), and then the empirical case context (3), where applicable. The social dialogue initiative is then examined in detail (4), including a description of the initiative, the stakeholders involved and their motivations, the process, and the outcomes in terms of working conditions and rights. Finally, the analysis turns to broader challenges and implications (5).

Where no specific reference is provided in the within-case analysis, the source is the respective national country report, which also offers further elaboration on specific aspects and findings (see Ilsøe & Bjerre 2025; Ledoux & Teke 2025; Murphy, Ryan & Gibbons 2025; Pais 2025; Hesselink & Been 2025).

5.1. Denmark – Collective agreement between the cleaning platform Hilfr and the union 3F¹

This case focuses on the Danish cleaning platform Hilfr and the use of collective bargaining to regulate working conditions in the platform economy. The initiatives are two landmark agreements – Hilfr1 and Hilfr2 – negotiated between Hilfr and the union the United Federation of Danish Workers (3F).

5.1.1. Institutional Framework of Danish labour market regulation in domestic cleaning and care

The Danish model of labour market regulation is a voluntaristic industrial relations model where wages and working conditions are primarily regulated through collective bargaining between unions and employer associations. This approach features high

¹ The following within-case analyses build on national reports prepared by Ilsøe & Bjerre (2025).

levels of union density (63%) and collective agreement coverage (84%), and the role of statutory labour laws is limited (Larsen 2019; Arnholtz & Navrbjerg 2021). For example, Denmark does not have a statutory minimum wage, and core employment rights are largely negotiated through collective agreements. Industrial conflict levels are low, and central coordination of bargaining contributes to stability in the system. However, certain sectors – including cleaning services in private households – remain less regulated and are characterized by lower levels of bargaining coverage and a higher prevalence of undeclared work. These gaps have proven conducive to the emergence of platform-based business models.

5.1.2. Regulation of digital labour platforms

Although platform work remains a marginal form of employment in Denmark – accounting for less than 1% of annual income-generating activity – it has triggered widespread debate since 2016. Most platform workers are classified as self-employed and thus fall often outside the scope of both labour law protections and collective agreements. Regulatory debates have focused on tax compliance, employment status, competition law, and social contributions. Attempts to regulate digital labour platforms through traditional frameworks have had limited success. However, the Hilfr agreements represent a rare and pioneering example of applying collective bargaining in the platform economy.

5.1.3. Introduction to the case: Hilfr – a platform for domestic cleaning

Hilfr is a Danish platform founded in 2017 that offers cleaning services in private households. From its inception, Hilfr attempted to position itself as a socially responsible platform, initially providing a “welfare supplement” to freelancers to compensate for their lack of social protection. It operated in a market populated by other platforms such as Happy Helper, Cleady (which later merged with Happy Helper), and Handyhand. In contrast to its competitors, Hilfr engaged in a unique collaboration with the United Federation of Danish Workers (3F) to conclude a collective agreement in 2018, known as Hilfr1. This agreement was followed by a second agreement, Hilfr2, in 2024.

5.1.4. Using the bipartite arena to regulate platform work

Content and structure of the collective agreements

The two collective agreements represent the core of the social dialogue initiative. Hilfr1, concluded in 2018, allowed workers to opt into employee status and receive associated benefits, while still preserving a freelance option. Hilfr2, signed in 2024, expanded these protections by making all workers employees, raising minimum wages, and embedding strong safeguards around the use of AI and algorithmic

decision-making. A digital union club was also created to facilitate worker organization in a context where direct interaction between workers is limited.

Social partners involved in the initiative and their motivations

The initiative was jointly developed by Hilfr and The United Federation of Danish Workers (3F). For Hilfr, entering into a collective agreement was a business strategy to differentiate itself in a competitive market and build a sustainable, socially responsible model. For 3F, the aim was to extend labour protections to a part of the market traditionally outside collective bargaining coverage and to ensure that platform workers received adequate wages and social benefits.

Process and implementation dynamics

The absence of a sector-level collective agreement for household cleaning created an opening for negotiating a company-level agreement. This opportunity was further supported by the broader policy climate at the time, particularly the work of the national Disruption Council (2017–2019), which brought together key stakeholders from government, unions, and employer associations and fostered a favourable environment for dialogue and experimentation. The re-negotiation process for Hilfr2 was delayed by several external factors, including a ruling from the Danish Competition Authority in 2020, the COVID-19 pandemic, multiple changes in company ownership, and the ongoing negotiations surrounding the EU Platform Work Directive (2021–2024). Once the EU directive was finalized, Hilfr and 3F resumed negotiations and concluded Hilfr2 in 2024.

Implications

Hilfr1 had a tangible impact on platform workers' conditions. A growing share of jobs was completed by employees – called 'super Hilfrs' – who benefited from minimum wages, pension contributions, holiday pay, and sick pay. Workers reported high satisfaction due to the combination of flexibility and security, and the employee status which simplified administrative tasks like tax filing. Hilfr2 went further by classifying all workers as employees, increasing the minimum wage, and enhancing access to social protections such as health insurance and paid sick leave. The agreement also introduced collective digital rights and mechanisms to challenge algorithmic decisions in labour courts. A digital cloud based union club was created to facilitate worker organization despite geographic and language barriers.

5.1.5. Challenges and broader implications

The Hilfr agreements illustrate both the potential and the challenges of extending collective bargaining to the platform economy. Legal and institutional barriers – such as competition laws and the classification of workers – complicate the negotiation

process. The digital nature of the work also makes union organization difficult, especially given the intense competition between cleaning workers and their geographical dispersion. Language barriers further limit union engagement, as most workers have a foreign background, and many do not speak Danish. 3F has expressed a commitment to addressing this by offering multilingual services through the digital union club, but implementation will take time.

Moreover, while Hilfr2's provisions on algorithmic management are among the most advanced in Europe, it remains to be seen how these rules will function in practice. The employer is now legally responsible for algorithmic decisions, and workers have the right to challenge them in court. However, enforcing fairness in algorithmic management requires technical insights and operational capacity that may be difficult for smaller platforms to maintain. Hilfr remains a small platform with around 60–70 employees, yet its agreements may serve as a testbed for broader regulatory innovations in the European platform economy.

5.2. France – Government-led reform on health and safety implemented via collective agreements ²

This case study focuses on the French home care sector and the creation of a right to occupational health for domestic workers employed by private households. Initiated by a legislative reform, the process was later operationalized through bipartite collective agreements between the Fédération des Particuliers Employeurs de France (FEPEM) and representative trade unions (The General Confederation of Labour (CTG) and French Democratic Confederation of Labour (CFDT)). The 2022 agreement marks a key step in pooling employer contributions and establishing access to occupational health services for a fragmented and often precarious workforce. While not limited to digital platforms, the initiative also has implications for platform workers.

5.2.1. Institutional framework for French labour market regulation in domestic cleaning and care

France features a state-supported and legally embedded system of industrial relations. Collective agreements are often legally extended by the state to entire sectors, even when union density is relatively low (ETUI 2016). In line with this, the French labour market regulation for home care and domestic services combines legal standards with sector-specific collective bargaining to balance worker protections and flexibility (Caillaud et al. 2024: 9–11). A special salaried employment regime offers core rights such as minimum wage floors and paid sick leave, but with reduced levels

² The following within-case analyses build on national reports prepared by Ledoux & Teke (2025).

of social protection in areas such as pensions and unemployment insurance (Ibid: 10). The French home care sector is covered by legally extended collective agreements, meaning that most salaried workers, regardless of employer type (directly by households, by non-profit or for-profit providers), are covered by these agreements.

5.2.2. Regulation of digital labour platforms

Digital labour platforms in France's home services sector remain relatively marginal, especially in care work, due to strict regulatory requirements. Platforms that wish to provide services to elderly or disabled people or serve as specific intermediary agencies (*mandataires*) between families being employers and workers must be authorized (for the providers) or agreed (*agrément*, for the *mandataires*) by local or national authorities. These processes involve demanding eligibility criteria, such as having physical premises and carrying out in-person needs assessments and coordination meetings. These rules and regulations have constrained the development of purely digital platforms in the care sector. To navigate these constraints, some platforms operate through the "*mandataire*" model, where the household is the legal employer and the platform acts as an intermediary, is responsible for administrative work and sometimes it also organises replacements and receive payments for their service provision.

Regulatory efforts have recently focused on easing some constraints of the "*agrément*" procedure, particularly by removing the requirement for physical premises. Nonetheless, platforms are still subject to obligations such as informing employers (households) of their legal duties, and they must adhere to the sector-wide agreements and labour standards.

5.2.3. Using the unilateral arena to regulate platform work

Content of the initiative

A recent initiative on regulating platform work is the development and implementation of a right to occupational health and safety for domestic workers employed by private households. Although such a right was formally introduced through legislation in 2011 and reaffirmed by court rulings, it remained largely unimplemented due to the structural complexity of the care sector and financial burdens on individual employers. A landmark inter-branch agreement was signed in 2016 and legally extended by the state in 2017, setting the stage for the creation of a dedicated occupational health system. This initiative culminated in the 2022 collective agreement, which established a national pooled fund financed through employer contributions to ensure health and safety services for all domestic and home care workers employed by families in the care sector (those employed by providers were already covered).

Social partners involved in the initiative

The initiative was spearheaded by the main employers' federation (FEPEM) and trade unions (notably CGT and CFDT), both recognized as representative at the national level. FEPEM had diverse motivations: legal compliance, reputational concerns, particularly given the rise of platform-mediated work in the sector and the interest to develop the corporatist institutions in which it plays an important role. For unions, the initiative was seen as essential for ensuring basic rights and protections for a vulnerable workforce, often composed of multiple jobholders with low bargaining power. Importantly, the agreement was developed in close collaboration with relevant state institutions, including the Directorate General of Labour and the Directorate of Social Security.

Process and implementation dynamics

The process began after the 2011 law and was catalysed by a 2012 court ruling that required equal access to occupational health for both full-time and part-time workers. Initial negotiations resulted in a 2016 agreement that was eventually legally extended by the state to cover the entire care sector. Despite formal adoption, implementation remained stalled due to logistical and financial challenges. The 2021 Health at Work Law (law no 2021-1018) gave new impetus by requiring the pooling of social contributions and designating a representative association of social partners (APNI) to manage the system. The 2022 agreement finalized this model, setting a contribution rate and outlining how services would be provided – primarily through telemedicine, but also via in-person consultations when necessary. The process involved significant coordination and was enabled by a strong social dialogue tradition in the sector.

Implications

While not specific to platform workers, the agreement indirectly affects those working via platforms being simple marketplaces between family employers or those under the mandataire model. In both models, the workers are considered employees of households and are thus covered by the sector-level agreement. The initiative could improve their access to occupational health services, even if the practical implementation remains challenging. The agreement creates a legally backed mechanism for pooled funding, mandates employer contributions, and aims to provide universal access to occupational health, including medical check-ups, preventive interventions, and compensation for health-related work absences. In interviews, some platform workers acknowledged awareness of these rights but also highlighted the persistent difficulty in accessing services due to system bottlenecks.

5.2.4. Challenges and broader implications

The French case highlights both the potential and limitations of extending labour protections to workers in platform-mediated domestic services through state-led regulatory reform in combination with bipartite implementation. While the creation of an occupational health right for domestic workers employed by households represents a significant institutional achievement, the initiative does not directly regulate platforms or redefine their employer responsibilities.

At an operational level, the initiative faces implementation barriers. The shortage of occupational doctors, especially in rural areas, and the limited capacity of health services constrain access to the entitlements created under the agreement. While telemedicine is intended to ease some of these difficulties, doubts remain about its adequacy in supporting workers with complex or high-risk health needs.

Although the initiative covers workers, who may also be active on platforms – particularly under the mandataire model – it does not bring platforms themselves into the scope of social dialogue and does not cover the workers mainly self-employed in the home cleaning segment. Trade unions continue to raise concerns about the implications of platformisation in care, calling for stronger regulation and the development of alternatives. One such alternative is France Emploi Domicile – an ethical platform co-developed by FEPEM and CGT – which aims to offer a non-commercial, publicly oriented response to the rise of digital intermediation by providing a publicly governed matching service for family employers and workers. Still in its early stages, this initiative signals an emerging effort to steer the digital transition in care work towards greater public accountability, rights protection, and collective governance.

5.3. Ireland – The absence of tripartite social dialogue in the platform economy ³

This case focuses on the absence of social dialogue initiatives in response to the emergence of platform work in care and cleaning services. The lack of engagement is largely due to the invisibility of platform workers, the fragmented and precarious nature of their work, and limited awareness among key stakeholders, including trade unions, employers, and policymakers.

5.3.1. *Institutional framework for Irish labour market regulation in domestic cleaning and care*

Ireland has a voluntarist industrial relations system, similar in structure to that of Denmark, but with lower union density and weaker collective bargaining coverage.

³ The following within-case analyses build on national reports prepared by Murphy, Ryan & Gibbons (2025).

Social dialogue played a central role during the era of the national partnership model (1987–2009), but this model has since been dismantled, and collective bargaining now tends to be more decentralised and enterprise-based. Sectoral regulation through instruments such as Registered Employment Agreements (REAs) and Employment Regulation Orders (EROs) still exist, but its scope is limited and uneven across sectors (MacCarron, Erne, & Regan 2019).

Despite this institutional context, Ireland's care and cleaning sectors experienced significant union organising efforts during the 2000s and early 2010s. These campaigns resulted in improved working conditions through the extension or establishment of sectoral collective agreements. In particular, the cleaning sector campaign culminated in the 2012 REA for contract cleaning, which set minimum wage rates, introduced a sick pay scheme, and enabled union dues deduction at source. These REAs are enacted through EROs issued by the Labour Court and are designed to protect vulnerable workers and prevent social dumping. However, the increasing privatisation of services, especially in the care sector, has eroded many of these gains. While most workers remain formally employed, they are often subject to precarious contracts and lack effective access to collective bargaining in practice.

5.3.2. Regulation of digital labour platforms

Although the platform economy has attracted interest in the care sector due to its potential profitability and relatively low barriers to entry, digital labour platforms have so far had only a limited presence in Ireland's home care and domestic cleaning sectors (Murphy et al. 2024: 9). Their emergence has not been met with any targeted regulatory response. There is no specific legislation addressing platform work in these sectors, and as a result, platform workers in home care and cleaning operate outside the scope of existing regulatory and social dialogue frameworks, as the current framework primarily regulates formal employment relationships.

5.3.3. No use of the tripartite arena to regulate platform work

Lack of initiatives

There is currently no active social dialogue initiative focused on regulating or improving conditions for platform workers in the care or domestic cleaning sectors in Ireland. This absence contrasts sharply with earlier campaigns in both sectors that successfully used social dialogue to improve conditions for directly employed workers.

Social partners' lack of engagement

No actors – neither trade unions, employers, nor government bodies – have initiated a coordinated response to platform work in this sector. Trade unions such as the

Services Industrial Professional Technical Union (SIPTU) have acknowledged the existence of platforms but do not currently target these workers for recruitment or representation. Politicians are aware of platform work in delivery sectors but show limited knowledge or urgency regarding its expansion into care or cleaning. NGOs working with ethnic minorities, migrant workers, or women also reported minimal engagement with this issue, despite working extensively in employment support.

Void in stakeholder engagement due to invisibility of platform work

Rather than a coordinated process, the case study reveals a void in stakeholder engagement with platform work in the care and cleaning sectors. Several factors help explain this gap: first, the small size and informal nature of the platform workforce; second, the tendency to prioritise legal approaches (e.g., tackling bogus self-employment) over grassroots organising; and third, structural difficulties in unionising domestic and migrant workers, who are often isolated, precarious, and legally vulnerable. Trade unions, employers, and government actors have focused their efforts on more visible forms of employment, while care and cleaning platform work has remained largely under the radar.

Implications

In the absence of any initiative, platform workers in home care and cleaning continue to face unregulated and often exploitative working conditions. Workers are typically classified as self-employed, leaving them without access to minimum wage guarantees, sick pay, social insurance, or occupational health and safety protections. Interviews with NGO representatives suggest that workers often avoid seeking legal recourse due to fear of immigration repercussions or lack of knowledge. Even when support services exist (e.g., through the Workplace Relations Commission or the Free Legal Advice Centre), long waiting times and administrative complexity limit their usefulness. As a result, platform workers remain disconnected from the institutional frameworks that support directly employed workers, with no union representation or voice in collective bargaining processes.

5.3.4. Challenges and broader implications

The main issue emerging from this case is the institutional invisibility of platform workers in the care and cleaning sectors. This invisibility is reinforced by the absence of organising campaigns, limited awareness among social partners, and a lack of clear legal classification for platform workers. Migrant and precarious workers – especially international students and those with restricted or undocumented status – are particularly vulnerable, as they often lack access to social protection and are afraid to assert their rights. The lack of social dialogue risks creating a dual labour market, where the self-employed, platform-mediated workforce is left behind.

Stakeholders interviewed for this study acknowledge the potential threat posed by platform work to existing employment standards and collective agreements. NGOs have called for improved oversight, better coordination with trade unions, and government-led regulation to prevent exploitation and ensure a minimum standard of rights for all workers, regardless of employment status. However, social partners are ‘playing ostrich’ – avoiding engagement with an emerging issue.

In summary, the Irish case illustrates how the absence of proactive engagement by state and social partners has allowed platform work in the care and cleaning sectors to develop in a regulatory vacuum. Without significant intervention, this could undermine the gains achieved through decades of social dialogue and collective bargaining in related sectors.

5.4. Italy – Municipal initiative for formalising platform care work through a cooperative-led model ⁴

This case study examines a municipal initiative that seeks to formalise platform-mediated domestic care work through a publicly supported, cooperative-led model. The initiative represents a locally driven experiment in socially responsible platform work, with limited engagement from traditional social partners.

5.4.1. Institutional framework for Italian labour market regulation in domestic cleaning and care

Italy’s industrial relations system is pluralist and highly fragmented, with multiple trade union confederations and employer associations. Collective bargaining occurs at both sectoral and company levels, with national sectoral agreements playing a key role in setting wage floors. Although union density has declined, collective agreement coverage remains high due to the widespread application of sectoral agreements (Pedersini 2019).

In the domestic care sector, employment relationships are typically regulated by the National Collective Agreement for Domestic Workers and Carers (NCBA). The most recent renewal of this agreement in 2023 sets out provisions for wages, working hours, leave, training, and social security coverage (Amorosi et al. 2024: 10). However, this sector is also marked by widespread informality and limited enforcement (Ibid: 3). This informality is reinforced by the fact that domestic work takes place in private homes, making it difficult for authorities to conduct inspections or enforce standards. The sector is also highly feminised and dependent on migrant workers, contributing to its invisibility (Ibid: 2).

⁴ The following within-case analyses build on national reports prepared by Pais (2025).

5.4.2. Regulation of digital labour platforms

Despite an increase in domestic work brokered by digital platforms (Ibid: 7), there is currently no targeted regulatory framework for digital labour platforms in the Italian domestic care and cleaning sectors. The platforms currently on the market operate in a regulatory grey zone, providing matching services or act as showcase for carers and clients without assuming employer responsibilities or guaranteeing formal labour protections (Muratore & Pavolini 2024:14). The Family Assistant project distinguishes itself by explicitly integrating formal employment contracts through a digital platform and involving actors authorised to manage employment, contrasting with the informal models found in other parts of the sector. However, Italian law prohibits social cooperatives from acting as employment intermediaries, which necessitates collaboration with an authorised employment agency for contract management.

5.4.3. Introduction to the case: The Family Assistant project

The Family Assistant project was launched in 2023 by the municipality of Piazzola sul Brenta (Veneto region) in collaboration with several neighbouring municipalities, cooperatives, and a digital platform provider. It was funded under a regional programme for active ageing. The initiative aimed to address temporary and low-intensity support needs of elderly individuals – distinct from formal care roles – by creating a new professional figure: the “family assistant.” These workers perform non-medical tasks such as companionship, cleaning, and meal preparation, offering flexible services to support both elderly residents and family carers, especially women. The project involves four main actors: the municipality (project initiator and coordinator), Cooperativa Jonathan (training provider), WelfareX (digital platform provider), and Cooperjob (labour agency managing employment contracts). While the platform is not a formal platform cooperative, the involvement of multiple cooperatives aligns it with some principles of platform cooperativism.

5.4.4. Using the unilateral arena to regulating platform work

Content of the initiative

The initiative – the Family Assistant Project – is a form of unilateral social dialogue, initiated by the municipal government with limited involvement from traditional social partners. Its central innovation lies in integrating a digital matching platform with formal employment contracts, offering both training and legal protection to workers. The platform matches supply and demand for care-related tasks while ensuring that employment relationships comply with national collective agreements.

Stakeholders involved in the initiative

The Family Assistant project was initiated by a network of municipalities in collaboration with social cooperatives, motivated by local care needs and the goal of promoting work–life balance and female employment. The project aimed to create a flexible, accessible care service while formalising employment relationships in a sector often dominated by informality. The initiative also sought to be sustainable beyond public funding, envisioning eventual handover to cooperative management. Initial attempts to involve trade unions and employer associations was met with resistance or disinterest.

Process and implementation dynamics

The process was shaped by public funding cycles, municipal elections, and regulatory limitations. The project faced delays due to electoral silence periods, administrative burdens, and shifting political priorities. Although trade unions and employer associations were initially consulted, they expressed concerns over platformisation, the adequacy of training, and the introduction of new intermediaries. As a result, the municipality proceeded without them, instead relying on trusted cooperative partners with prior collaboration experience. A 13-hour training course was delivered to selected participants, who could then register on the digital platform and be matched with families in need. Employment was formalised for each task via Cooperjob, ensuring compliance with labour law and collective agreements.

Implications

The Family Assistant initiative ensures that workers are formally employed under the national collective agreement, with pay rates above the legal minimum and entitlements such as paid sick leave and pension contributions. Workers also gain flexibility in choosing tasks and hours. However, the system requires signing a new contract for each individual job, creating administrative burdens. Moreover, the platform's limited visibility has resulted in low demand so far, and some workers have struggled to find work through it.

5.4.5. Challenges and broader implications

The Family Assistant project highlights both the opportunities and limitations of public–cooperative partnerships in formalising platform–mediated care work. The platform ensures formal employment and quality standards but has faced barriers, including limited scale, regulatory constraints, and scepticism from trade unions. The legal requirement for a separate contract for each task imposes significant administrative demands. Moreover, the project challenges traditional union roles, as it introduces new intermediaries and a flexible professional figure that falls outside existing categories of care work and potentially weaken the unions' bargaining power. In addition, it is not yet financially sustainable at scale. Public funding and private

investment have supported the pilot phase, but whether the project can be maintained over time remains uncertain.

The project demonstrates an innovative model of socially embedded, cooperative-driven platform work in the care sector. However, it also underscores the challenges of integrating such models into broader industrial relations frameworks, particularly in sectors marked by informality and fragmentation.

5.5. The Netherlands – Union-led court case challenging the classification of Helping platform cleaners ⁵

This case study examines a union-led legal initiative in the Netherlands aimed at challenging the classification of domestic cleaners working through the Helping platform. The case illustrates the use of strategic litigation as a tool of social dialogue in the absence of formal negotiations and highlights the challenges of regulating platform work through the courts.

5.5.1. Institutional framework for Dutch labour market regulation in domestic cleaning and care

The Netherlands has a corporatist and consensus-based industrial relations model, characterised by strong tripartite institutions and social dialogue at national, sectoral, and enterprise levels. Collective agreements are widely used and may be legally extended by the government to cover entire sectors (Been & Keune 2019). As a result, labour rights are generally well-established for employees in standard employment relationships. However, many domestic workers in the cleaning and care sectors fall outside these protections due to their classification as self-employed or informal workers. Those working fewer than four days per week for private households fall under the Home Services Regulation (Regeling Dienstverlening aan Huis), which places employer responsibilities on private individuals and limits platform workers' access to formal labour protections (Hesselink & Been 2024: 4).

5.5.2. Regulation of digital labour platforms

Platform work remains a modest and hard-to-monitor part of the Dutch labour market – particularly in the domestic cleaning and care sectors. Its presence has not been matched by a corresponding legal or policy response, and there is no dedicated regulatory framework for digital labour platforms in the Netherlands (Hesselink & Been 2024: 5). Some domestic care platforms apply the Home Services Regulation. Existing labour laws were designed for traditional employment relationships and do

⁵ The following within-case analyses build on national reports prepared by Hesselink & Been (2025).

not clearly address the intermediary role that most platforms self-ascribe. In the absence of targeted regulation, platforms operate within legal frameworks not designed for digital intermediation, leading to significant ambiguity regarding the employment status of platform workers. The lack of standardisation in how platforms operate further complicates efforts by authorities and unions to regulate working conditions. As the Helpling case illustrates, litigation has become a key tool for testing platform responsibilities under existing Dutch labour law.

5.5.3. Introduction to the case: Challenging classification of cleaners on the platform Helpling

This case study centers on Helpling, a Berlin-based household cleaning platform that entered the Dutch market in 2014. Helpling allowed households to find cleaners through a digital interface and operated on the claim that it merely facilitated contact between cleaners and clients. However, the platform's role included setting fee structures, managing bookings, providing payment services, and limiting off-platform arrangements. Cleaners were classified as self-employed and subjected to platform-imposed rules and commission fees. A dispute emerged in 2017 when a cleaner sought sick pay and was denied on the grounds that Helpling was not the employer, citing the Home Service regulation. This led to a years-long legal battle initiated by the Federation of Dutch Trade Unions (FNV), challenging the employment classification of Helpling cleaners.

5.5.4. Using the unilateral arena to regulate platform work

Content of the initiative

The initiative took the form of strategic litigation spearheaded by the Dutch trade union FNV as part of their broader union strategy to contest precarious platform work. The case aimed to establish that cleaners working via Helpling were not genuinely self-employed but functionally employees or temporary agency workers entitled to protection under the Cleaning collective labour agreement (CLA).

Social partners involved in the initiative

FNV initiated the case in response to a request from a cleaner and framed it as a broader challenge to platform-based bogus self-employment. FNV's goal was to expose and regulate exploitative labour practices, enforce the Cleaning CLA, and set legal precedent for the classification of platform workers. The union argued that Helpling exerted significant control over workers' tasks, scheduling, and payments, and was therefore acting as a de facto employer.

Process and implementation dynamics

Legal proceedings began in 2018 and spanned several years, involving multiple rulings at different court levels. In 2019, the District Court partially sided with FNV, recognising Helpling as an intermediary but not as an employer. In 2021, the Amsterdam Court of Appeal concluded that Helpling was operating as a temporary employment agency, meaning cleaners were agency workers. However, Helpling appealed, but declared bankruptcy in 2023 during the cassation process. The Dutch Supreme Court permitted continuation of parts of the case in 2024, with proceedings ongoing as of March 2025. The drawn-out timeline and Helpling's bankruptcy underscore the limitations of case-by-case litigation in regulating the platform economy.

Implications

Although the case has not resulted in a final Supreme Court ruling, it has already had substantial effects. Helpling exited the Dutch market following its bankruptcy. The case also sets a precedent for reinterpreting platform-worker relationships and prompted changes in other platforms' business models. For example, the platform Hlprs (now Hups) restructured its operations to avoid being classified as an employer, limiting its role to payment processing and insurance, while leaving employment arrangements to clients and workers. Despite these changes, the Helpling case has not yet established stable protections for cleaners across the sector, and the legal status of platform cleaners remains uncertain pending further rulings.

5.5.5. Challenges and broader implications

The Helpling case reveals both the promise and the limits of legal action as a strategy for regulating platform work. FNV successfully challenged Helpling's self-employment model, pushed for the enforcement of collective agreements, and forced a reconsideration of the regulatory framework. Yet, the lengthy judicial process and the platform's withdrawal from the market highlight how litigation can lead platforms to adjust their strategies to circumvent regulation, rather than bringing about systemic change.

The case illustrates a broader pattern in the Dutch platform economy: legal victories can lead to strategic business restructuring rather than lasting protections for workers. To break this cycle, political will, legal reform, and proactive enforcement is required – none of which are currently in place at the time of writing.

6. Lessons from social dialogue initiatives

Guided by our theoretical framework, we move beyond the individual initiatives to examine cross-case dimensions that shape efforts to improve wages and working conditions for platform workers in home care and cleaning, as well as their institutionalization.

Table 2 presents the five initiatives across five key dimensions for understanding the development and implications of social dialogue in the home care and cleaning sector: The social dialogue setting, the characteristics of the initiative (if any), the context and background, the established employment relation and the implementation and implications of the initiatives.

The cross-case analysis builds on the information presented in Table 2 but develops a comparative perspective by examining dimensions that cut across both the cases and the categories of the table. We examine the different stages in the development of initiatives, moving from their initiation and development through their implications to their viability. Finally, we consider the broader potential of these initiatives from a European perspective.

Table 2, Display of initiatives across dimensions for understanding the development and implications of social dialogue in the home care and cleaning sector

	Denmark – Hilfr1 and Hilfr2 agreements	France – Right to occupational health	Ireland – Absence of initiatives	Italy – The Family Assistant project	The Netherlands – Helping court case
Context and background					
<i>Sector – organisation and size</i>	Overall cleaning sector is largely formal, private household cleaning is largely informal. Platform work is marginal.	Home care sector is predominantly formal due to strict regulatory requirements. Platform work is marginal.	Overall cleaning and care sector is largely formal, private household cleaning and care shows an informal component. Platform work is marginal.	Overall care sector – and especially domestic care – has widespread informal component. Domestic platform work more prominent than in Northern European cases.	Overall cleaning sector is largely formal, private household cleaning shows an informal component. Platform work is marginal.
<i>Workforce characteristics</i>	Workforce is primarily female and specifically on Hilfr almost exclusively migrants.	Workforce is primarily female and native-born.	Workforce is primarily female with high share of legally vulnerable migrants.	Workforce is primarily female and high share of migrants.	A high share of the workforce are migrants.
<i>Model of labour</i>	A voluntarist model of industrial	A state-supported, legally embedded	A voluntarist model of industrial relations – weak coverage	A pluralist and fragmented model of industrial relations –	A corporatist, consensus-based

<i>market regulation</i>	relations – strong coverage.	model of industrial relations.		high coverage through sectoral agreements	model of industrial relations
<i>Regulation of care and cleaning platforms</i>	Weakly regulated – low levels of agreement coverage.	Extended collective agreements cover most salaried home care workers, regardless of employer type.	No regulation.	Platforms remain unregulated.	Weakly regulated – some platforms apply the Home Services Regulation, but those who ascribe as intermediaries are not regulated.

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	Denmark – Hilfr1 and Hilfr2 agreements	France – Right to occupational health	Ireland – Absence of initiatives	Italy – The Family Assistant project	The Netherlands – Helping court case
Social dialogue e setting	<i>Arena</i> Bipartite (Union + company)	Unilateral in combination with bipartite (Government + Employers' association + Unions)	-	Unilateral (Government)	Unilateral (Union)
<i>Involve d actors</i>	Hilfr (platform). The United Federation of Danish Workers (3F).	Employers' federation – the <i>Fédération des Particuliers Employeurs de France</i> (FEPEM). The General Confederation of Labour (CTG). French Democratic Confederation of Labour (CFDT). Government bodies.	-	Municipalities in the Province of Padua. Non-profit social cooperative Jonathan. WelfareX (digital platform developer). Cooperjob (employment agency owned by non-profit organizations).	Trade Union Confederation (FNV). District court. Amsterdam Court of Appeal. Dutch Supreme Court. Cleaning
<i>Domain</i>	Cleaning	Cleaning and Care	Cleaning and Care	Care	Cleaning

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	Denmark – Hilfr1 and Hilfr2 agreements	France – Right to occupational health	Ireland – Absence of initiatives	Italy – The Family Assistant project	The Netherlands – Helping court case
Characteristics of the initiative					
<i>Initiator</i>	Initiated by Hilfr and jointly developed by Hilfr and 3F.	Government led (legislative reform). FEPEM, CTG and CFDT in collaboration with relevant state institutions (agreement).	- No one – neither trade unions, employers, nor government bodies – have initiated.	Initiated by the municipal government.	Initiated by the Federation of Dutch Trade Unions (FNV).
<i>Coverage scope</i>	- Workers on Hilfr.	Domestic workers employed by households – including platform workers.	-	Workers on the platform ('family assistants' performing non-medical tasks).	Workers on Helping.
<i>Process</i>	Completed (to be renegotiated).	Completed.	-	Ongoing implementation.	Ruling by the Amsterdam Court of Appeal. Appealed. Legal proceedings ongoing (Dutch Supreme Court).

<i>Degree of formalisation</i>	Collective agreement	Legislative reform Collective agreement	–	Collaboration formalized; training, matching and employment contracts in place.	Ruling (appealed).
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	Denmark – Hilfr1 and Hilfr2 agreements	France – Right to occupational health	Ireland – Absence of initiatives	Italy – The Family Assistant project	The Netherlands – Helping court case
Employment relation <i>Employment status</i> <i>Employer identity</i>	<p>Workers are classified as employees.</p> <p>Hilfr (platform)</p>	<p>Workers are classified as employees.</p> <p>Households as employers – multi-employer setting</p>	<p>-</p> <p>-</p>	<p>Workers are classified as employees</p> <p>Cooperjob is the formal employer (the platform itself is owned by an LLC).</p>	<p>Workers classified as agency workers.</p> <p>Helping classified as temporary employment agency.</p>
Implementation and implications <i>Enablers of development and implementation</i>	<p>Motivation to demonstrate social responsibility, which also serves as a means of strengthening the platform's competitive standing.</p> <p>No competing sector-level agreement for</p>	<p>The idea of pooling social contributions enabled the organisation of a collective, sectoral occupational health service.</p> <p>Telemedicine introduced to ease access, though limited for complex cases.</p>	<p>-</p>	<p>Small size of municipality facilitated fast decision making.</p>	<p>Worker stepping forward and case brought forward by the union</p>

	cleaning in private households. Enabling context: Negotiations took place alongside the activities of the tripartite Disruption Council (2017–2019), which focused in part on digital platforms.			
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	Denmark – Hilfr1 and Hilfr2 agreements	France – Right to occupational health	Ireland – Absence of initiatives	Italy – The Family Assistant project	The Netherlands – Helping court case
<i>Barriers of development and implementation</i>	Geographically dispersed workforce in competitive relationship limiting collective action. Language can be a barrier for the digital union club.	Shortage of occupational doctors and limited health service capacity restrict access to entitlements. Administrative and financial burdens limit use of rights, despite worker awareness. Does not address the platforms directly.	Not on the radar: Limited in numbers. Geographically dispersed workforce and transient nature of employment hinder unionisation. Migration status (legally vulnerable – no or limited right to work and/or reside).	Delays due to electoral periods, administrative burdens, and shifting political priorities. Limited resources and scale. Economic sustainability unclear. Scepticism from trade unions and employer associations (concerned about platformisation, training and new intermediaries). Administrative burden of individual contracts for each task.	Slow pace of legal proceedings hinders effective regulation of platform work through litigation. Limited awareness of their legal rights among workers.
<i>Output and outcomes</i>	All workers formally classified as employees. Increased minimum wages.	Right to occupational health for domestic workers employed by	-	All workers formally classified as employees (national collective agreement). Flexibility in choosing tasks and hours.	Case set a precedent for interpreting platform-worker relationships and prompted changes in other platforms' business models.

	<p>Strong safeguards for AI and algorithmic decision-making. Establishment of a digital union club.</p> <p>Use of collectively agreed rights remains unclear.</p>	<p>private households, but access limited.</p>		<p>Weakens traditional union bargaining efforts.</p>	<p>Helping classified as temporary employment agency and workers classified as agency workers.</p> <p>Workers entitled to protection under the Cleaning collective labour agreement (CLA).</p> <p>Helping declared bankrupt.</p> <p>Platforms adjust their strategies to avoid regulation.</p> <p>Legal status of platform cleaners remains uncertain pending further rulings.</p>
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6.1. Initiating and developing social dialogue initiatives – the role of regulation, visibility and actors

The first step in developing successful social dialogue initiatives is the recognition of a need for regulating wages and working conditions for platform workers in the care and the cleaning sectors. Key questions are though: how do such concerns gain visibility and reach social partners' agenda? One factor may be the state of *existing conditions and regulation*. Where workers are already covered by existing regulation, the urgency of improving working conditions and access to social protection may appear less pressing. In four of the five cases – Denmark, Ireland, Italy and The Netherlands – platform work in care and cleaning remains largely unregulated or weakly regulated. France stands out as the exception, where legally extended sector-level agreements cover most salaried home care workers, including platform workers regardless of employer type. A key challenge there is less about regulatory coverage and more about implementation and enforcement, as reflected in the bipartite sector-level agreements on introducing a right to occupational health and safety for domestic workers employed by households (cf. section 5.2 above).

That the absence of regulation can pave the way for new initiatives is also illustrated by the Danish case, where the lack of competing sector-level agreements made it possible to establish a bipartite company agreement on the care platform Hilfr.

Another factor that may influence agenda-setting is the *visibility* of platform work itself: the number of workers affected and the profile of those workers. As argued in the beginning of the report, domestic work has an invisible nature due the fact that workers often work in private households. Furthermore, the workforce is geographically dispersed and work alone, which means that they are difficult to organise – a challenge that is not new, but well-known from the broader care and cleaning sectors although further reinforced by most correspondence between individual workers and the platform takes place digital rather than via a physical workplace.

Looking across the five cases, in four of the countries – Denmark, France, Ireland and the Netherlands – both the industrial cleaning and the care sector is predominantly, if not solely, formal. Cleaning in private households is largely informal in these countries, but platform work is marginal, adding to the invisibility of platform workers in care and cleaning. Only in Italy, the care sector, and in particular domestic care, is marked by widespread informality, and domestic platform work is more prominent than in the four Western and Northern European countries. Thus, a higher number of workers are affected by the (lack of) regulation and their work is more visible in Italy than in the other four countries.

In addition to the marginal role of platforms in care and cleaning, in Denmark, Ireland, and the Netherlands, a high share of the workforce consists of migrants (the same is

the case for Italy, but not France). This may add to the invisibility of workers, as they may have limited knowledge of their rights or weaker ties with trade unions and potential other support structures such as labour inspectorates etc. (Ustek Spilda et al. 2022). The combination of an invisible workforce and the challenges of unionising domestic and migrant workers may keep care and cleaning platform work under the radar of social partners, as illustrated in the Irish case (cf. section. 5.3 above). Nevertheless, initiatives have still emerged in Denmark and The Netherlands, where the cases highlight a company level agreement and a union led court case, respectively. One key difference in the workforce compared to Ireland concerns the legal status of migrant workers. In Ireland, some of those engaged in platform work may lack the right to work extended hours or even to work in the capacity required by platforms while residing in the country, creating a particular form of legal vulnerability that also makes it more difficult to organise and represent these groups of workers. This situation of lack of a right to reside and work does not appear to apply in the same way in the other countries studied.

The higher visibility of platform workers in care and cleaning in Italy might suggest more favourable conditions for agenda-setting. Yet both trade unions and employers' associations have expressed scepticism of 'platformisation', which has acted as a barrier to collective agreements. This suggests that visibility may be an enabling factor for pushing social dialogue initiatives (as in the French case), but it is neither a sufficient nor necessary condition. The Danish and Dutch cases demonstrate that initiatives can emerge even in the absence of high visibility – but not without an actor willing to initiate the process and ensure its development and implementation

A third factor in agenda-setting and visibility is the extent to which *actors* have (strategic) interests in governing platform work or negotiating collective agreements in the care and cleaning sector. Interestingly, France is the only case, where trade unions were the main initiators of an initiative (in combination with the state), working in collaboration with the French employers' federation. In Denmark and the Netherlands, trade unions also played a significant role in the development of initiatives, but the original impetus came from a platform in the Danish case and from a platform worker in the Dutch case (It is worth noting, however, that when it comes to legal litigation, trade unions cannot initiate a case on their own – an individual worker must first step forward). In the Italian case, a municipal government initiated the initiative. In Ireland, neither trade unions, employers, nor government bodies took initiative. The variation in actors taking the initiative can reflect the different industrial relation regimes that the platforms operate in. For instance, it is no surprise that the state plays a key role as initiator in France and Italy, as these countries both belong to the Polarised/State-centered industrial relations regime (Visser 2009). It is also no surprise that unions are involved in the social dialogue initiative in Denmark, which belongs to the Organised Corporatism regime with strong unions and employers'

organizations. Union involvement can also be expected in The Netherlands that belongs to the Social Partnership regime with strong social partners on parts of the labour market (ibid.). Ireland forms part of the Liberal Pluralism Industrial Relations regime, where social dialogue is often absent (especially bipartite sector-level social dialogue is absent) due to low union densities and limited coverage by collective agreements. Thus, it is less surprising that no actor has driven the initiation of an initiative in Ireland (so far).

In addition to actors' motivation, the scope of coverage may be an important factor in the development of initiatives, once the issues reach the agenda. The five initiatives analysed in this report were purposely selected for their relevance and the richness of the case (cf. Methodology section 3). They are not, however, examples drawn from a large pool. In some countries, the initiative examined is the only social dialogue initiative addressing workers on care and/or cleaning platforms. In The Danish, Italian and Dutch case, the initiatives cover workers on the respective platforms (Hilfr, WelfareX and Helpling), although the Helpling court case may also have implications for other platforms. In the French case, by contrast, a new statutory right to occupational health and safety was formally introduced through legislation and reaffirmed by court rulings. The absence of tripartite initiatives or bipartite agreements covering larger populations suggests that the more narrowly targeted or unilateral initiatives may be easier to develop. However, this may come at a price in that it is more difficult to generalise these initiatives and extend their coverage to the whole sector for domestic services via digital platforms.

Other enablers, more specific to the individual initiatives, include the size of the decision-making body – for example, the role of small municipalities in facilitating decision-making in the Italian initiative – and the broader context, as in Denmark, where the parallel work of the tripartite Disruption Council (2017–2019), which partly focused on digital platforms, helped create momentum and underline the need for action. By contrast, the scale of the legal system and the slow pace of legal proceedings hinder the effectiveness of regulating platform work through litigation.

6.2. Implications of social dialogue initiatives

Turning to the implications of the initiatives, we find it useful to draw on Easton's (1965) distinction between *outputs* and *outcomes* in policy analysis. In this perspective, outputs refer to the binding decisions, their implementing actions and certain associated kinds of behaviour, while outcomes capture the broader societal consequences and changes that follow from these outputs (Easton 1965: 351). In our analysis, outputs include binding agreements, legislative reforms, court rulings, and formalised collaborations, whereas outcomes concern the wider effects of these measures on wages and working conditions. The institutionalisation of social dialogue

can be seen as another outcome dimension, building on the outputs and their outcomes. We return to this in greater detail in section 6.3 about the viability of these initiatives. While Easton subsumes both decisions and their implementation under the heading of ‘outputs’, we treat *implementation* as a distinct stage in the ‘cycle’ linking outputs to their outcomes. An agreement that is formally concluded but not implemented nor enforced is unlikely to generate meaningful outcomes.

Starting with outputs, the initiatives show different kinds of binding results. In Denmark, the output is two collective agreements – Hilfr1 and Hilfr2 – negotiated between the cleaning platform and the union. In France, the output is a collective agreement on the implementation of a right to occupational health for domestic workers employed by private households negotiated between the main employers’ federation and trade unions following a legislative reform. The Italian initiative led to a formalized collaboration around training, matching and employment contracts of ‘family assistants’. Finally, in the Netherlands, the current output is a court case ruling that the cleaning platform Helpling was operating as a temporary employment agency.

While some of these outputs are highly formalised, taking the shape of collective agreements or court rulings, others are more informal, understood as collaborative arrangements and organizational practices that do not carry the same binding legal authority. Yet, a common denominator of all the outputs is the recognition of platform workers as employees – or, in the Helpling case, as temporary agency workers. With this status comes access to a range of labour rights and protections, including entitlements related to statutory or collective bargained wages, social security, and occupational health and safety. In the Danish case, the agreement also introduces a strong safeguard for AI and algorithmic decision-making.

While some rights, such as the minimum wage, are fully implemented, others – such as the compensation for health-related work absences in the French case – are less likely to be enforced. As a result, whether these initiatives have achieved their intended outcomes, namely improvements in working conditions beyond wages, remains unclear in several of the cases.

One potential barrier to asserting employment rights is lack of knowledge, as mentioned in the Dutch case. Lack of knowledge may stem from limited information as well as language barriers. In Denmark, the Hilfr2 agreement addresses this by establishing a digital union club to support workers’ engagement in collective representation. Nonetheless, language remains an obstacle for many workers. Given that a large share of platform workers in Denmark, Italy and the Netherlands are migrants (also in Ireland, where no initiatives are in place), offering multilingual support (as planned in Denmark) could help improve implementation, enforcement and access to rights.

Another barrier to implementation – highlighted by the Italian case – is the administrative burden arising from having multiple employers. The Family Assistant project's care service model requires separate contracts for each task, which increases administrative work for employees and may reduce the attractiveness of the setup. Addressing the challenges of multiple employers is precisely the objective of the French initiative, which pools resources from different employers and establishes a corporatist structure. Yet even in France, administrative requirements related to accessing the service hinder the practical use of the right to occupational health.

In addition to the outcomes directly linked to outputs, there are also unintended or counterproductive outcomes. Two cases – Italy and the Netherlands, both marked by unilateral initiatives – illustrate this potential dynamic. In the Italian Family Assistant project, concerns were raised that the initiative might weaken traditional union bargaining efforts by shifting regulation away from established collective frameworks. In the Dutch case, the Helpling litigation highlights the risk that other platforms may adjust their business models to evade regulation without necessarily improving working conditions. As noted in the case report, without “proactive policy measures, stronger enforcement of labour laws, and continued advocacy from labour organizations [...] the risk remains that platforms will continue to innovate new ways to bypass regulations, perpetuating a cycle of legal disputes and regulatory adaptation” (Hesselink & Been 2025). Thus, involving social partners from the outset may help ensure more successful outcomes and sustainable solutions, as we will discuss in the following section.

6.3. Viability of social dialogue initiatives

One aspect of the analysis is whether the initiatives have generated outputs that are implemented and lead to outcomes improving the wages and working conditions of platform workers in care and cleaning. Another, equally important, aspect is whether these outputs – and their implementation and outcomes – are sustainable over time. In other words, are the initiatives viable? Here, the institutionalisation of the initiatives can be understood as an additional dimension of the outcome, pointing to their potential durability and long-term impact.

A central factor for viability is whether workers can *organise* collectively and sustain representation over time (Clegg 1976; Hyman 2001). Here, the question of employee status is crucial: as the cases demonstrate, recognition of platform workers as employees (or, in the Dutch case, as temporary agency workers) provides access to a set of rights that enable association and collective representation. At the same time, clarification of employer status is significant. In both the French and Italian initiatives, the model of multiple employers complicates collective organisation, as each worker

is formally linked to a series of individual households or contracts rather than a single employer. This fragmentation reduces the potential for building stable bargaining counterparts and limits the scope of association. In France, however, the state-supported and legally embedded system of industrial relations, with its established coverage of the home care sector, combined with the social partners' interest in strengthening corporatist institutions, seem to have helped to mitigate this barrier. By contrast, in the Italian initiative, where the involvement of traditional social partners is limited, the long-term sustainability of the initiative appears more uncertain.

A second dimension in assessing the viability of an initiative concerns *formalisation*: the extent to which outputs take the form of binding, formalised arrangements. Across the cases, these range from collective agreements (Denmark, France), to a formalised municipal collaboration (Italy), to court rulings (Netherlands). Generally, the more formalised the output, the stronger its institutional anchoring and the greater the likelihood that it will be sustained over time (Clegg 1976; Hermans et al. 2017; Arnholtz & Refslund 2024). However, formalisation alone is not sufficient. In the Italian case, for instance, while the collaboration is formalised, its long-term viability remains uncertain due to its project-based nature, limited financial scale, and weak support from social partners, as discussed above. Likewise, even strongly formalised outputs such as court rulings may face challenges: lengthy legal processes and the ability of platforms to rapidly adapt their business models can undermine the practical impact of regulation. This *suggests* that the *arena* in which initiatives are anchored – whether unilateral, bipartite, or tripartite – also matters for their long-term viability (Ebbinghaus 2006). At the same time, even where the legal right to organise is secured, structural barriers such as language diversity and the dispersed, individualised character of the work reduces the likelihood of mobilisation in practice – and thus potentially weaken the durability of formalised arrangements in the long term. The Danish case illustrates this tension: although the Hilfr agreements formally cover workers on the platform, almost none of the cleaning workers are union members. This raises questions about not only the representativeness and legitimacy, but also the sustainability of such agreements when they are to be renegotiated, and more broadly, about the capacity of formalisation to translate into long lasting institutionalisation without union membership among the workers (Hyman 2001).

Taken together, the degree of organisation and formalisation shape the sustainability of the initiatives. Where both dimensions are strong – as in collective agreements backed by established unions and recognised employer counterparts – the chances of creating durable improvements seem higher. Where either organisation or formalisation is weak, the risk is that initiatives remain isolated or temporary, with limited ability to reshape labour standards. Ensuring viability therefore requires not only institutionalising outputs but also fostering worker mobilization and unionisation to sustain them over time.

6.4. Discussion of the wider potentials of the initiatives in a European perspective

While the national case studies of social partners innovative strategies illustrate both opportunities and barriers, they are not selected in a way that allows for causal claims or broad generalisations. Neither do they represent an exhaustive repertoire of strategies. Instead, they were purposefully selected and they highlight possible pathways and point to key factors shaping the development and sustainability of social dialogue aimed at improving conditions in the subsectors of care and cleaning within the platform economy.

As shown above, the cases point to several positive aspects that may inform future approaches to improving working conditions in platform-mediated care and cleaning work. First, the findings indicate that innovative initiatives can emerge when actors mobilize around shared concerns, and that they are more likely to succeed when supported by all key stakeholders. The Danish and French cases demonstrate that, when such stakeholders are involved, collective agreements can be established and implemented, setting standards for aspects such as wages, working hours, and occupational health.

Second, the initiatives highlight that new arenas and constellations of actors may complement rather than replace traditional industrial relations. Municipal authorities, social cooperatives, and hybrid organisational forms, as in the Italian Family Assistant project, illustrate how experimentation at the local level can generate new models of regulation and representation. These arrangements may not yet be fully institutionalised, but they provide valuable insights into alternative routes for embedding protections in fragmented and often informal sectors.

Third, the cases underscore the importance of framing platform work in continuity with broader labour market debates. Linking platform work to established labour rights – such as minimum wages, occupational health, and employee status – can help bridge the gap between new forms of work and existing institutions. In this way, platform workers may benefit indirectly from sector-wide protections, even where dedicated initiatives remain limited.

While we find examples of initiatives that in effect improve wage and working conditions for some workers, it is difficult to find initiatives that have systematic and long-lasting effects. This may partly reflect the fact that many of these initiatives are relatively recent, making it too early to assess their enduring impact.

One of the main challenges lies in the difficulty of establishing and maintaining traditional industrial relation actors (unions and employers/employers' associations) that can initiate and sustain social dialogue. If the costumer is the employer, workers

are faced with a fragmented group of employers and collective bargaining seems very difficult to introduce or implement. If the workers are not unionised, they may not have the power resources to initiate social dialogue on their wage and working conditions (Arnholtz & Refslund 2024). In general, it seems to be difficult for unions to navigate in the field of care and cleaning platforms and organise workers – even in cases such as Denmark, where a collective agreement has been successfully signed for one platform. The sector is characterised by migrant workers often working alone in private households. Also, these workers might have different needs and wishes than the trade unions (Bjerre & Ilsøe 2025).

The EU Platform Work Directive is to be implemented by member states by late 2026. It will be interesting to follow, whether the national presumption rules that classifies platform workers as employees if facts of control and direction is present will be implemented and enforced for workers on care and cleaning platforms and make them attain employee status. Whereas the national presumption rules are expected to cover transportation and food delivery platforms, it remains unclear if they will also apply to care and cleaning platforms. Commentators argue that the worker profiles, the free choice of gigs and the often free price setting are characteristics of such platforms that might speak against presumption of employment, but the burden of proof lies according to the directive with the employer, not the individual platform worker. It will be interesting to follow the implementation of the Platform Work Directive throughout 2026 and see if profile platforms in care and cleaning will be covered or not and to what extent there will be any national variation on this issue.

If many care and cleaning platforms will be covered by the presumption rules, the employee status of workers could be used as a lever for unions or other actors to initiate more social dialogue processes on wage and working conditions for the workers on these platforms – an issue already raised by for example Danish trade unions in the national consultation processes prior to the adoption of EU's directive.

7. Conclusion

This report contributes to offering insights into the less researched area on social dialogue in care and cleaning platforms. It does so through five illustrative case studies from Denmark, France, Ireland, Italy, and the Netherlands, examining initiatives – or, in some instances, the absence of initiatives – aimed to improve the wage and working conditions of platform workers in these sectors. The cases are drawn from a very limited universe of initiatives, in some instances representing the only available example in the given country. They should therefore be seen as illustrative showcases

of innovative strategies developed by social actors rather than as representative of a broader landscape.

The analysis builds on an employment relations/industrial relations perspective that emphasizes power relations and the asymmetry of bargaining power between employees and managers. To this, we add an understanding of initiatives informed by the concept of social dialogue, which allows us to also capture initiatives that do not necessarily involve the traditional social partners i.e. unions and employers' associations. Moreover, we draw on a neo-corporatist perspective to account for initiatives that involves both sides of industry and tripartite initiatives, including the state as well as those initiated unilaterally by one single social actor.

The five cases span from bilateral collective agreements to state-initiated reforms implemented via collective agreements, municipal collaborations, and court rulings, thereby illustrating the diversity of strategies through which actors seek to regulate wages and working conditions in platform-based care and cleaning.

Our analysis is structured around the different stages in the development of initiatives, moving from their initiation and development through their implications to their viability. When it comes to the initiation and development stage, we argue that factors such as (lack of) existing regulation, visibility, and motivated actors play a central role in agenda-setting. With respect to visibility, platform work in the care and cleaning sector shares many of the features of domestic work more broadly, above all its relative *in*visibility. The workforce is dispersed, with workers typically operating in private households, which leaves them isolated and difficult to organise. In the cases analysed here, most workers are migrants (with the exception of the French case, where the majority are native-born); in the Irish case, a significant share even holds precarious legal statuses. This composition not only creates knowledge and language barriers but also deepens the invisibility of the workforce, as migrant workers often lack established networks, and voice channels.

Other factors shaping the visibility of platform workers include the degree of formality in the sector and the relative share of work mediated by platforms. Where the sector is more formalised, the relatively small group of workers in informal or platform-mediated arrangements tends to remain invisible. By contrast, where the sector is largely informal and platforms play a more prominent role, these workers – and their needs – seem more likely to enter the public debate. As the analysis has shown, greater visibility can enable the initiation of new initiatives, but it is neither a sufficient nor a necessary condition for their development. What does appear to be a necessary condition across the five cases, however, is the presence of actors with a strategic interest in governing platform work or negotiating agreements in the care and cleaning sector. Whether this actor is the platform itself, the union(s), the employers' association(s) or other actors.

Once initiated, if an initiative is to become institutionalised, our analysis highlights the importance of a setup that enables organisation (for example, avoiding models with multiple employers, which make collective organisation difficult) and the formalisation of outputs. While all four initiatives examined (with no comparable initiative in Ireland) succeeded in securing employee status for workers (or temporary agency worker status in the Dutch case) and thus created at least the potential for organisation on the employee side, the degree of formalisation differs. Formalised outputs provide stronger institutional anchoring, increase the likelihood of implementation, and enhance the chances that agreements or decisions will be sustained over time. Yet, while formalisation may be a necessary condition for viability, it is not sufficient for achieving sustainable solutions with broader coverage. Here, the arena of social dialogue becomes crucial. Unilateral initiatives such as court cases or municipal projects may be easier to launch but may come at the cost of limited coverage and reduced potential to extend regulation across the wider domestic care sector and the platform economy more generally. The two cases of bipartite initiatives involving traditional social partners examined in this study resulted in collective agreements, but these too remain limited in scope. The analysis suggests that developing broader bipartite or tripartite initiatives covering larger populations is significantly more challenging.

One of the main challenges lies in the difficulty of mobilising traditional industrial relations actors (unions and employers' associations) that can initiate and sustain social dialogue. The composition of the workforce and the multiple individual users, combined with language barriers and limited access to information, makes it particularly difficult for unions to navigate the care and cleaning platform sector and to organise workers.

Beyond this, the initiatives analysed here show that, despite the many challenges, there is room for constructive experimentation and learning across contexts. Even small-scale or locally anchored initiatives may pave the way for broader institutional solutions by testing new approaches and demonstrating what is possible. The diversity of strategies observed – from collective agreements and litigation to municipal programmes and cooperatives – suggests that, depending on the specific context and model of labour market regulation, different pathways may gradually strengthen protections for workers. By drawing inspiration from these initiatives and adapting them to national and local contexts, policymakers and social actors can build the foundations for more inclusive and sustainable regulation of platform work in care and cleaning across Europe.

8. References

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