# • WageIndicator

# 2020-2021 CROSS-COUNTRY STUDY ON THE GIG ECONOMY



# WageIndicator Foundation

The WageIndicator Foundation started in 2001 to contribute to a more transparent labour market for workers and employers. The foundation collects, compares and shares labour market information through (online & face-face) surveys and desk research. It serves as an online library for wage information, labour law and career advice. The WageIndicator Foundation is assisted by world-renowned universities, trade unions and employers' organisations and currently operates in 196 countries. Their international staff consists of some 100 specialists spread over the whole world. The WageIndicator Foundation is a global organisation reaching millions on a monthly basis. For more information, please visit WageIndicator.org. WageIndicator Foundation has offices in Amsterdam (HQ), Bratislava, Buenos Aires, Cape Town, Islamabad, Maputo, Pune and Venice.

# Project: Platform Workers: Decent Rights and Pay

While the platform economy is growing rapidly in the Netherlands and abroad, knowledge about income and legal positions of platform workers lags behind, both among policymakers and platform workers themselves. Systematically gathered knowledge is needed to achieve improvements, preferably in dialogue with platform workers and their representatives. A good view of schemes (or initiatives to create them) and income in a varied group of countries can be used immediately to achieve improvements with platform workers and their representatives. This includes collective bargaining agreements, contracts, remuneration systems, legislation and, of course, organisational forms, such as a trade union, a platform workers group, a cooperative, or a Facebook community. By means of the WageIndicator infrastructure and methodology, the existing knowledge arrears can be quickly and effectively made up.

More details about the project, please see:

https://wageindicator.org/Wageindicatorfoundation/projects/platform-workers-decent-rights-pay

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# **Key Words:**

Gig Economy, Platform Work, Gig Workers, labour Rights, India, Argentina, Spain, South Africa and The Netherlands

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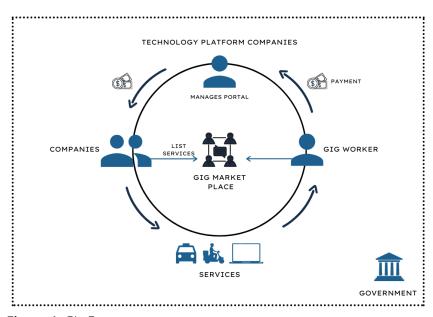
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# INTRODUCTION

# 1. Short Background About the Gig Economy

Over the past decade, there has been a shift in the traditional labour market with a rise in freelance and task-based economies. This has accelerated by the emergence of digital platforms, making it easier to connect job seekers with job providers at low cost and maximum flexibility. Gig work is associated with and connected to the economy's widespread changes and does not remain an isolated trend. Advancements in technology and globalisation have pressured companies to respond swiftly to the changes in the market. From this point of view, the emergence of unconventional gig work is an underlying component of today's world of work (Weil, 2019).

A gig economy is characterised by workers employed on a flexible, temporary, and contractual basis. There are various ways to define gig work depending on the nature of work, work arrangement, and legal framework. These different definitions lead to different gig workforce numbers ("What is a gig worker?", 2020). The gig-economy can be broadly classified into service-based and knowledge-based gigs. Service-based gig consists of low to semi-skilled workers, such as delivery agents and those who offer services through work on-demand platforms. Knowledge-based gig work encompasses semi to high skill jobs, such as that of consultants or data scientists. Gigs can be found at all levels of an organisation, differing from low to high skilled workers, part-time to full-time work - running the entire spectrum of pay scales (Frazer, 2019).



**Figure 1**: Gig Economy (Source: Authors' own)

### 1.1 Stakeholders

**Technology platform companies:** Technology platform companies have played an essential role in expanding the gig economy, facilitating direct transactions between consumers and producers, and offering flexible work schedules to workers.

**Gig workers:** The gig economy is creating opportunities for people to earn additional or supplementary income. As work is job-specific, employees can choose to work on their schedules and with more than one contractor - thereby controlling their work hours and pay. Furthermore, the gig economy is driving highly skilled professionals and individuals towards agile work and skill-based development, meeting the needs of the future workplace environment ("What Are The Pros & Cons Of The Gig Economy?", 2019).

**Companies:** The rapid expansion of the gig economy benefited job providers seeking a cost-cutting and a skilled workforce. Companies now want to hire individuals to perform specific tasks to avoid extensive administrative and compliance costs. As an added benefit, the excess supply of labour has kept the wages relatively low (Monga, 2020). The appreciation for gig workers is tactical for some companies and strategic for others. For instance, few companies hire freelancers to tide over the immediate crisis in the wake of the Covid-19 pandemic. However, some companies took a more long-term perspective to review the current organisational structure (Mitra, 2020).

**Government:** The government acts as a mediator between the other two stakeholders, gig workers and companies. However, the extent to which the government intervenes to complement the self-evolving gig economy varies from nation to nation.

# 1.2 Benefits and Challenges of the Gig Economy\*

	Workers	Companies
Benefits	<ul><li>Flexibility</li><li>Independence</li><li>Access to opportunity</li><li>Work-life balance</li></ul>	<ul><li>Low cost</li><li>A diverse pool of flexible workers</li><li>Low administrative &amp; compliance costs</li></ul>
Challenges	<ul><li>Lack of job and social security</li><li>Unsteady workload</li><li>Lack of financial stability</li><li>Lack of cultural solidarity</li></ul>	A smaller pool of reliable workers

**Table 1**: Benefits and Challenges of the Gig Economy (Source: Authors' own)

\*This is only a generalization and the benefits/challenges are not 100% equal in all cases. For more information, please visit <a href="https://www.eurofound.europa.eu/publications/blog/lets-move-beyond-platitudes-on-platform-work">https://www.eurofound.europa.eu/publications/blog/lets-move-beyond-platitudes-on-platform-work</a>

# 2. Objectives of the Report

This report seeks to provide insights into the working conditions and rights of platform economy workers globally, and in particular: Argentina, South Africa, Spain, India and the Netherlands. The report gathers insights from the WageIndicator Foundation's "Platform Workers: Decent Rights and Pay" survey data. In this regard, this report's objective is to process, use, and offer action-oriented information that could fill in the knowledge gaps in the domains of rights, pays, and working conditions in the gig economy. While this report doesn't aim to influence policy decisions, it does aim to discuss the conditions of the gig economy and the existing labour law surrounding the same.

# THE GIG ECONOMY AROUND THE WORLD: A LITERATURE REVIEW

# 1. Gig Economy Around the World

The gig economy is rapidly growing in countries around the world while changing the global employment landscape. The ongoing pandemic has only hastened its development. There are approximately 70 million registered platform workers worldwide. Further, it is predicted that networks will mediate one-third of all labour transactions by 2025 (Graham & Anwar, 2019). Gig jobs account for 64 million people in the United States and the European Union, according to McKinsey. In Africa, McKinsey reports that 63 million people are self-employed (Pienaar, 2020).

A survey on crowd work In Europe found that 9% of UK residents had done paid work across platforms, comparable to 9% in the Netherlands, 10% in Sweden, 19% in Austria and 12% in Germany. In the United States, the gig economy currently employs around 36% of the workforce. There are evident patterns occurring in specific sectors, such as transportation and delivery. Uber currently has an estimated four million drivers worldwide. The survey concluded in a report that platform jobs are not only increasing quickly but also expanding into various fields, including health care, education, legal aid, and a vast number of manual and maintenance activities (Woodcock, n.d.). For example, care.com, a platform connecting children's sitters, senior carers, tutors, and housekeepers with people seeking them has 19.8 families and 14.3 million caregivers in their network (Dumcius, 2019).

Few geographical variations are also visible. The division of working time is one such example. Many workers who live in the global south work full-time and, in the north, more part-time, reflecting their employment satisfaction. The Netherlands, for example, is a "happy country" - people often work part-time and are pleased with the salary. In Spain, platform staff mostly work part-time but are not happy with both the number of working hours and the salary they will earn. On the other hand, many in India work full-time but are not happy with their salaries (Karanović, Osse, & Cañigueral, 2020).

For a lot of people, though, gig work provides supplementary earning in addition to other sources of income. Platform work is becoming a major source of income for a limited but increasing number of jobs (Woodcock, n.d.). Many people seem to like these different ways to work, but they need greater and more safeguards. The aim is to achieve an equal balance of liberty, flexibility and security (Karanović, Osse, & Cañigueral, 2020). Since the gig economy lacks institutional protections, the social costs of their employment would be absorbed mostly by private individuals. The gig economy is based on self-employment, which relieves the organisation of the need to fund benefits and other costs. Workers in the gig economy don't have access to a corporate pension, which means that millions of people aren't saving enough for retirement. This emancipation from conventional modes of employment is capable of creating greater challenges in the future for society. In certain nations, social security is linked to the normal work contract in different ways, whether to cover illnesses, unemployment, or maternity/paternity leaves (Woodcock, n.d.).

The effect of the gig economy is not just about the quantitative increase in the number of people employed in it. It also becomes a major test case for a new method of labour management. Thus, while there could be minor quantifiable effects from the gig economy, it could lead to enormous qualitative changes in future jobs. Successful approaches can be modified and used universally around the economy. Therefore, to envision a better future for employers and employees, it is essential to understand what is happening in the gig economy now (Woodcock, n.d.). As many countries saw during the Covid-19 period, platforms and policymakers can do more (Karanović, Osse, & Cañigueral, 2020).

2. Gig Economy in Argentina

Digital platforms are a relatively recent development in Argentina. Several factors, such as the ease of the system of payments abroad, accelerated the entry of new platforms and affiliation of foreign companies. This brought in a flow of investments into the local platforms that were previously installed. The growth of the gig economy presented the following benefits for workers:

- (i) flexible income-generating opportunities
- (ii) facilitation of access to jobs
- (iii) decentralisation of capital ownership.

Companies enjoy and exercise a considerable amount of control in setting up the pricing of services, collection of service revenue and evaluation of worker performance. While the platform economy offers income generation opportunities, the new forms of work are not included in the official statistics recorded by the government and remain hidden in categories of freelancing, non-standard wage-earning and informal workers. Furthermore, access to social security is often interlinked with employability; for this reason, gig workers are disadvantaged in terms of their rights - with no paid, sick or maternity leave, no family allowan-

ces or severance pay, no unemployment insurance and union representation (Madariaga, Buenadicha, Molina & Erns, 2019).

With the onset of the pandemic, brick-and-mortar stores were forced to close down. The e-commerce sector witnessed a growth opportunity for delivery work organised via digital platforms (by companies such as Glovo, Rappi, and PedidosYa). However, workers employed by the platform were being exposed to the risk of infection with no provision of sick leave or coverage for occupational disease (ILO, 2020). Worsening of the working conditions and suppression of workers attempting to organise and communicate their concerns to management led to an outbreak of protests in July 2020 (Fairwork, 2020). Therefore, while the gig economy offers income generation opportunities in the undertone of unemployment and underemployment, workers face regulatory issues and challenges with regards to the scope of work, tax and worker protection that were originally designed for the traditional means of work. Overall, there is insufficient official statistics about platform work in Argentina, with just a few studies highlighting the different scopes of labour and definitions

# 3. Gig Economy in India

India's gig economy employs around 3 million people (Banik, 2020). While this number appears to be small in comparison to India's population of 1.3 billion people, TeamLease Services claims that around 56% of new jobs in India – both blue and white-collar – are being generated by the gig economy (Pant & Krishna, 2020). Almost one out of four gig workers worldwide are in India, states Ernst & Young (Nanda, 2019). The gig economy in India has an excellent opportunity for growth as it is gaining more social acceptability. For some, gig work is their entire livelihood, while many use it as an additional income source.

Workplaces are undergoing massive transformations, and so is the way people function within them. The gig economy has undoubtedly led to India's work culture transformation - overriding the conventional relationship between the employer and the employee, one with greater autonomy and flexibility. In a developing country like India, the gig economy's potential is immense if harnessed appropriately (Goenka, 2020).

Gig economy networks offer a glimmer of optimism during this period of instability, employment cuts, and pay declines due to the Covid-19 pandemic. It is no longer just a case of preference and flexibility; it is a compulsion. It is believed that the gig economy will generate jobs, tap into idle time and energy, generate increased income, and thereby improve economic growth, diversifying the gig economy. More and more people would be forced to migrate out of full-time employment and gradually become part of the gig economy (Pant & Krishna, 2020).

While the pandemic has accelerated the gig economy's growth, it has also revealed the precarious nature of the jobs that once seemed appealing. Whether it is the lack of healthcare benefits, financial stability, or work over sustained periods, the gig workers have faced the pandemic's brunt in the absence of safety nets. Therefore, this has raised awareness about the fragility of various occupations within the gig economy (Chicago Booth Review, 2020). According to the International Labour Organisation, there exists irregularity of wages and conducive working conditions. Most platform-based gig workers tend to earn far less than minimum wage specific to their jurisdictions. The benefits are easily outweighed as there exists asymmetric information with no room for collective bargaining for better working conditions and wages by the workers (Pant & Krishna, 2020).

Labour Laws in India have seen very little

change over the years. However, the code on Social Security, introduced in 2020, seeks to protect gig workers' rights by giving them social security protections. This contains nine new regulations which have enhanced coverage and expanded the benefits to all workers in the organised/unorganised industries uniformly across the four labour codes (Kasturirangan, 2020). The code has broadened its coverage by covering the unorganised, fixed-term, platform and gig workers, inter-state migrant workers, etc., in addition to contract employees (Mishra, 2019). By defining 'gig worker' and 'platform worker' under the legislation, the government has finally recognised the gig economy (Pant & Krishna, 2020). While the code recommends that a Welfare Board be set up for the expedient redressal of complaints and concerns, it fails to provide the necessary mechanisms to empower this board to take such actions.

Among other requirements, the Social Security Code directs companies such as ride-sharing platforms, food and grocery delivery services and e-commerce websites to allocate one to two per cent of their gross annual turnover to social security coverage for employees. This includes provident funds, life insurance, gratuity, etc. While these provisions will help in the long run, employees are concerned about their current income reducing if a part of it goes towards their social security. This concern arises because most ride-sharing and e-commerce platforms are still not profitable and may push their employees' extra costs (Shekhar, 2020).

# 4. Gig Economy in South Africa

South African gig workers account for at least 1% of the South African labour force, rising by more than 10% annually. Common platforms connect consumers with various services: transport, food distribution, sanitation, maintenance, innovative knowledge and advancement of

technologies ("Doing business in the gig economy", 2020).

The gig economy has been described as one of five major developments with important consequences for business in the region. South Africa has been the gateway into the continent for many leading foreign players such as Uber, Airbnb, and Fon. Local competition and employment are said to be enhanced by the introduction of foreign firms, with domestic gig companies offering comparable services to internationally developed gig-economy giants. Economic conditions in the country have also provided a ready supply of labour, including people able to work for low pay because they have no other choice - notably, persistently high unemployment, which hit about 27% in 2018 (29.5% for women and 25% for men) after slowly rising in previous years (Hunt et al., 2019).

The gig economy has the ability to offer much-needed economic prosperity, as well as a solution to South Africa's unemployment problem by expanding jobs for individual workers in both the domestic and foreign labour markets (Pienaar, 2020). However, South Africa's employment crisis is not only about the number of jobs generated but more about the quality of those jobs ("South Africa's COVID-19 crisis brings gig economy workers into sharper focus", 2020). Unfortunately, the infrastructure, expertise, and economic development in South Africa are insufficient to sustain the adoption and spread of this business model ("SA business leaders could benefit more", 2018).

There is also no legal mechanism in place to oversee the gig economy. Gig workers are also classified as independent contractors in South Africa, which means they are not entitled to the same rights and benefits as jobs, such as guarantees from unjust labour practices and dismissal, basic working conditions, access to unemployment insurance, workplace injury

benefits, and a fixed minimum wage ("Doing business in the gig economy", 2020).

Technology platforms in the gig economy can be held liable under the Occupational Health and Safety Act, which requires companies in South Africa to take measures such that any individual directly affected by activities of the sector, to the extent feasible, is not susceptible to health or safety risks. If gig employees think their wellbeing is being jeopardised as a result of their jobs, they should report their platforms to the Department of Labour. Gig employees are also responsible for ensuring that their actions do not establish dangerous environments for themselves or others ("Doing business in the gig economy", 2020).

# 5. Gig Economy in Spain

In Europe, Spain is one of the countries that has had the most challenging time developing business for gig platforms. The Spanish institutions and their corporatism combined with a high level of distrust towards US digital players had restrained the development of gig platforms (Vitaud, 2015). Despite its slow emergence, the technological trends of the last few years (and the onset of the pandemic) have accelerated and driven the growth of the gig economy, and subsequently, the platforms. According to Morgan Stanley, Lockdowns imposed due to the Coronavirus lockdowns have helped increase the value of the food-delivery app industry as households relied on the platforms. Even before the pandemic, orders sprung a 70% increase in 2019 from the previous year, generating about 700 million euros in business for restaurants and apps (Soto, 2021). Like the rest of the world, Spain has witnessed a decline in workers' rights and a rise in precarious labour.

In the past, the role of freelancers has been put under the spotlight as employers continued to take advantage of the title; workers of food delivery company Deliveroo have taken matters into their own hands and contested against the unfair working conditions. The Spanish work inspectorate agreed by ruling that the delivery force was 'false freelancers', hiding the true employer/employee relationship (Pike, 2018). Apart from the legal debate surrounding the employment status of platform workers, there have been rising conversions regarding the concerns over job insecurity, precarious working conditions, the need for regulation, and the issue of the collective organisation both in terms of the difficulties and the adequacy of the existing channels. To counter the legal vacuum, Spain aims to bolster protection for workers hired on a freelance basis and grant them the benefits of formal labour contracts through legislative intervention. The details of a regulatory regime for gig workers are currently being discussed with Spanish unions and business associations (Carreno, 2021). Furthermore, Spanish Labour Minister Yolanda Diaz intends to codify in law that "food-delivery companies employ their couriers, rather than acting as intermediaries." While the government has announced to recognise riders working for delivery work services platforms as salaried staff, the bill still needs a green light from the cabinet, after which companies will have 90 days to implement it. The European Commission will issue recommendations on potential gig economy legislation later this year, which could serve as a model for the rest of the block (Kwok, 2021).

# 6. Gig Economy in the Netherlands

Depending on varying definitions, the number of Dutch workers in the gig economy varies from 0.4% to 10.6% (Oliemans-Ouwehand & James, 2019). While there are significant variations in the number of hours spent by cab drivers, craftsmen, and part-time food couriers, the majority of staff work fewer than 20 hours a week. While a large portion of the workforce

is young and well-educated, there are many low-skilled jobs like domestic work. As a result, the workplace demographic is extremely diverse, making a single definition of "the gig worker" difficult (Weel et al., 2018). Employees earn an average of €787 per month, working 20 hours per week. This includes both paid and unpaid hours (for example, waiting time). This equates to a fee of around €15 per hour on average. However, there are substantial variations in worker wages that are not captured by these composite figures: Serving for a maximum of € 8 per hour (including unpaid hours) is the standard for 25% of the workforce, while jobs in the upper quarter of the wage spectrum receive at least €19 per hour. The salary varies depending on the activity, with taxi drivers earning the most and cleaners earning the least (Weel et al., 2018).

The rise of the internet and, in particular, the rise of smartphones with applications has resulted in rapid growth. In addition, during the last five years, several international firms and investors have become more active, causing the market to grow. In terms of job opportunities, the gig economy's potential is determined by the ability to scale up existing activities and develop new ones. These possibilities are also reliant on the development of laws and regulations in this sector, in addition to the demand for goods and services and the availability of adequate employees (Weel et al., 2018).

Just like other nations, Dutch labour law has been struggling to keep up with new types of employment, such as the platform labour of the gig economy. The legal concept of employment does not square with these business practices. The lack of transparency about job rights has resulted in the loss of social security benefits for low-wage jobs in this industry, among other issues (Oliemans-Ouwehand & James, 2019).

In recent times, in the Netherlands, there have

been concerns about the future of the work contract. The government continues to be worried about the rising number of low-wage self-employed workers. The cabinet wants to improve the status of citizens employed in the platform economy ("Ministers ditch minimum freelance rate", 2020). Concerns have been expressed over the gradual deterioration of permanent job contracts and the rise of other types of employment arrangements, such as self-employment, gig economy jobs, freelancing, and other types of flexible working. This development is commonly seen as a growing societal crisis that threatens the Dutch social security system ("Doing business in the gig economy", 2020).

If the Netherlands wishes to sustain its current high degree of prosperity, it must take serious action to overhaul the labour market. The existing laws are creating unneeded social and economic challenges. There are worries regarding the increase of self-employment, fueling insecurity and stifling innovation ("Reforming labour market", 2020).

# DATA AND METHODOLOGY

The data collection for this report used various methods to suit the context of the country of interest. The platforms selected for each country also differ. Yet, to maintain uniformity, the same structured questionnaire was administered across different countries. All data collected was first recorded in the CEST Survey application.

The sample has 3103 observations. Table A-1 (see Appendix) describes the number of observations and the platforms they represent for the five countries considered in this report. Figure 2 shows the distribution of age across the platforms. Table A-2 (see Appendix) provides the average ages and their standard deviations for the sample and the countries considered in particular. Figure 3 shows the gender-based skewness in favour of men in the data collected. Secondary data was collected through newspaper accounts, journal articles, and policy documents, among others.

**Spain:** A variety of sources were used to collect primary data. Workers from platforms like Deliveroo, Just Eat, Uber Eats, Glovo, Cronoshare, Cuideo, Fiverr, Workana, Cabify, Uber and Malt were contacted, and close to 1030 interviews were conducted. For most platforms, a Facebook Ad campaign was launched. For Malt and Cronoshare, a collaboration with the companies was serviced such that the survey forms were shared among their employee pools. The platform Cuideo provided a list of ten employees who served as respondents and sources for more contacts. Gig workers at Workana and Fiverr were directly contacted using the platform itself. Workers at platforms such as Glovo, Deliveroo and UberEats were contacted via the Facebook advertisement and through their 'operations' teams and rider associations such as APRA, AAR and AsoRiders to build the sample space.

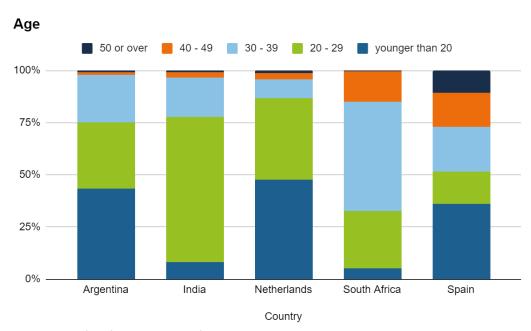
**South Africa:** In-person surveys were conducted with workers representing a variety of platforms. Further, posters informing workers about the survey were put up at locations often visited by gig workers to find respondents. Further, the platforms themselves were contacted to find more respondents. Platforms such as Uber Eats, Take A Lot, SweepSouth, Bolt, Uber, Nomad Now, NoSweet were contacted, and over 280 interviews were finished.

**Argentina:** Several posts were shared on social media platforms (such as Twitter and Facebook) via paid and unpaid target advertisements to find eligible respondents. Further, the team contacted gig workers' groups and unions through social networks. Due to the pandemic, telephonic surveys were conducted. 872 workers from UberEats, PedidosYa, Rappi, Glovo, Iguana Fix, Zolvers, Workana, Cabify and Uber were interviewed.

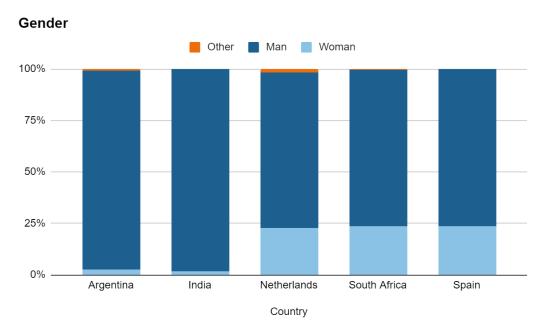
India: Primary data was collected through structured telephonic interviews. The sample was developed using the snowball method, whereby the initial interviewees helped us connect with more individuals in their circles. The total number of respondents exceeded 660 individuals working across ten platforms from different parts of India. The platforms were selected to represent the leading ride-hailing, food delivery, grocery delivery, and online shopping platforms in India. These platforms include but are not limited to Ola, Uber, Zomato, Swiggy, Amazon, Flipkart, SuprDaily, Groffers, Urban Company, and Big Basket. In total, 645 interviews were conducted.

**The Netherlands:** Primary data was collected via survey questionnaires and forms online via Facebook and offline at restaurants. The mode of reaching out on Facebook involved both paid

and unpaid targeted advertisements and posts. While posters for the study were put up at restaurants, cafes and other places frequented by gig workers, no face-to-face interviews were conducted. Workers from platforms such as Deliveroo, Uber Eats, Thuisbezorgd, Miles.Care. com, Helping, Amazon Mechanical Turk (MTurk), Clickworker, and Uber were interviewed, and over 270 responses were collected.



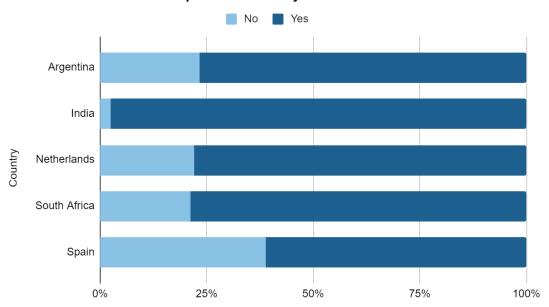
**Figure 2**: Age distribution across the countries (N = 3119) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)



**Figure 3**: Gender distribution across the countries (N = 2046) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

# MAIN RESULTS AND DISCUSSION

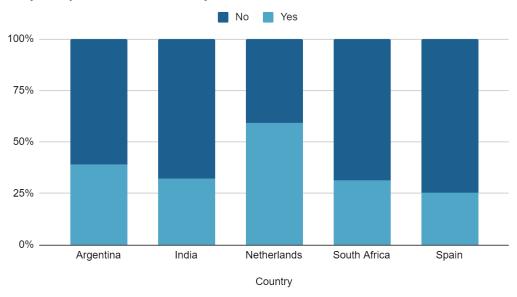
### Are co-workers in similar positions mostly male?



**Figure 4**: (N = 1824) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

The data collected is skewed in favour of males, which may be a reflection of the gendered nature of the gig economy. This is further supported by Figure 4, which shows that across the countries, more than 50% of the respondents revealed that most of their co-workers are males. Over 95% of the respondents in India and around 60% of the Spanish respondents claimed that a majority of their co-workers are male. This is significant because the gig economy provides little barrier to entry in terms of past work experience, skill/ education requirements. Yet, most of the gig work is still inaccessible to women.

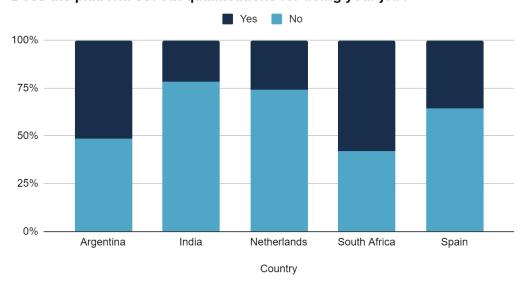
### Do your qualifications match your work?



**Figure 5**: (N = 2058) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

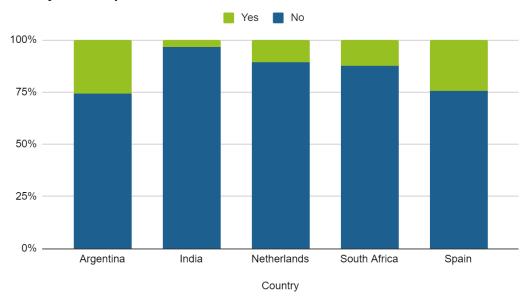
In terms of skills and qualifications, over 50% of the respondents reported a mismatch with their qualifications and jobs. While Figure 5 visualises this, Figure 6 shows that with the exception of platforms in Argentina and South Africa, platforms don't require specific qualifications for the workers. This speaks to the low entry barriers for gig workers.

### Does the platform set out qualifications for doing your job?



**Figure 6**: (N = 2075) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

### Have you been promoted?

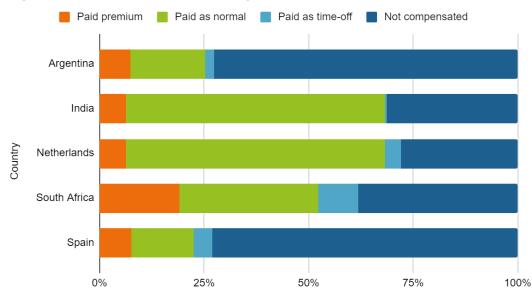


**Figure 7**: (N = 1949) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

Most gig workers have not been promoted. This is a function of the very nature of the gig economy- it is a marketplace that connects service providers to consumers. For instance, Uber connects an individual with the willingness to pay for travel to another individual with a car, the skill and the willingness to drive.

Therefore, once the trip is completed, the gig is over - leaving little room for promotion.

### If you work overtime, how is it compensated?



**Figure 8**: (N = 1746) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator-WageIndicator)

Given the nature of 'gig work', overtime is often paid as normal or is rarely ever compensated. Since the workers earn on a per gig basis, their pay varies month-from-month. Please turn to Figures 8 and 9, respectively, for a clearer picture. Figure 10 clarifies that while a majority of workers' salaries are dependent on the

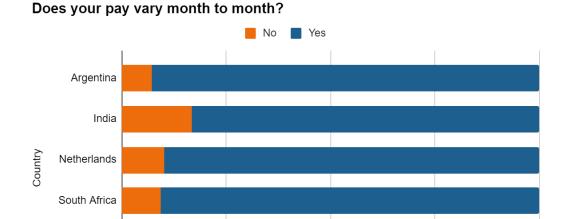
Spain

0%

number of tasks performed, some salaries are dependent on time worked or a combination of other factors.

75%

100%

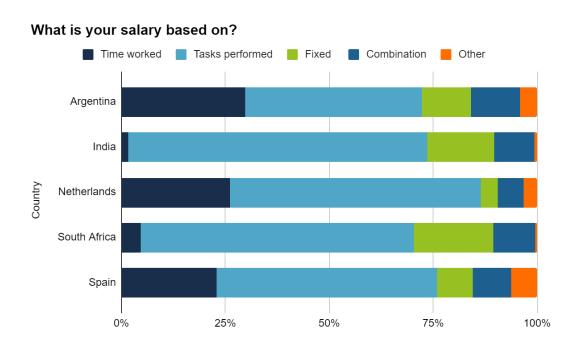


50%

Country

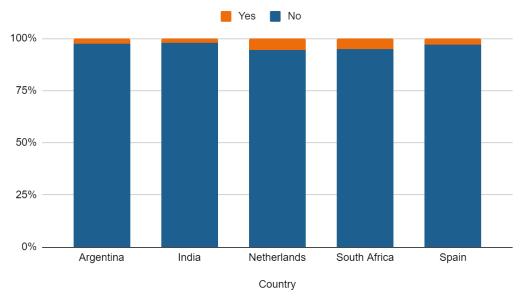
**Figure 9**: (N = 1884) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

25%



**Figure 10**: (N = 2157) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

### Does the platform pay a contribution to an unemployment fund for you?

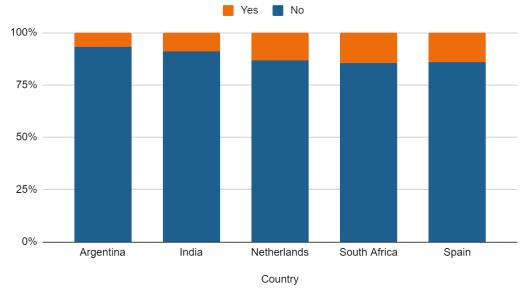


**Figure 11**: (N = 1299) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

While gig workers receive a 'salary', they are not recognised as 'employees' at the platform. Therefore, these workers are not legally entitled to benefits such as unemployment funds or paid sick leave. Figures 11 and 12 make it evident that platforms across the five countries largely don't have unemployment funds or options for annual paid sick leave for their workers. This translates into the high numbers

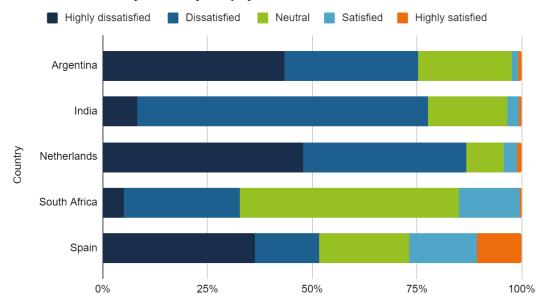
of dissatisfaction with pay, as shown in Figure 13. Close to 50% of the Argentine respondents reported that they were 'highly dissatisfied with their pay', and a similar number of Indian respondents said they were 'dissatisfied' with their pay.

### Does your platform provide paid sick leave?



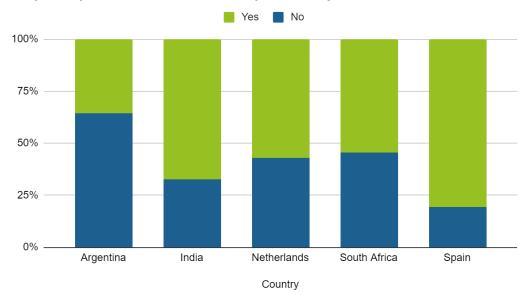
**Figure 12**: (N = 1957) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

### How satisfied are you with your pay?



**Figure 13**: (N = 3119) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

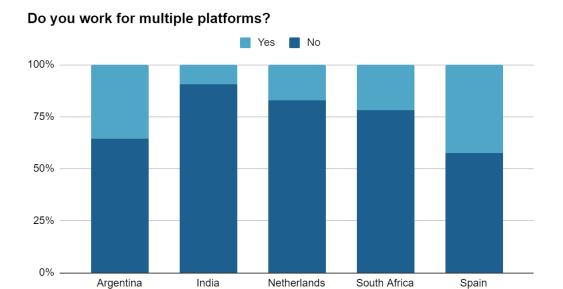
### Do you expect to work for the same platform a year from now?



**Figure 14:** (N = 1983) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

Consistent with the dissatisfaction with pay, workers don't expect to continue with the same platform. Here, the Indian case is interesting - while a majority of Indian respondents claim to be dissatisfied, they do expect to con-

tinue with the same platform. Please refer to figure 14 for the same. Further, workers largely work at the one platform only (see Figure 15) and keep a single job (see figure 16).



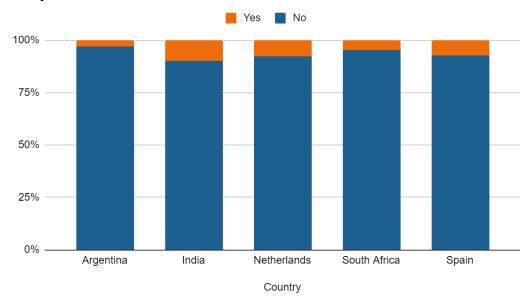
**Figure 15**: (N = 3113) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

Country

# Do you have another paid job, not for a platform? No Yes Argentina India Netherlands South Africa Spain O% 25% 50% 75% 100% Country

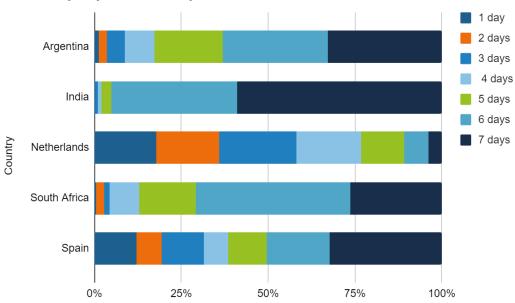
**Figure 16**: (N = 3114) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

### Are you a member of a trade union?



**Figure 17**: (N = 1802) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

## How many days a week do you work?



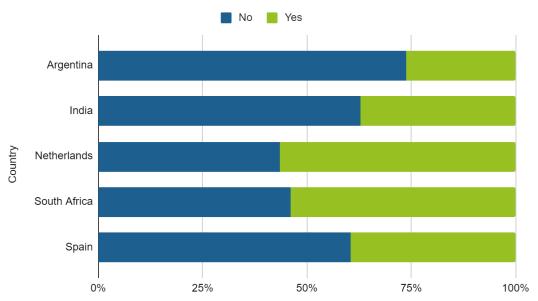
**Figure 18**: (N = 2393) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

Further, workers across Spain, Argentina, India and South Africa work for more than five days a week. Here again, India presents an interesting case wherein 90% of the respondents claimed to work for 6-7 days a week (see Figure 17). Additionally, most workers are not trade union members (see Figure 18). Contracts play an important role as they determine the rights, benefits and entitlements of the workers. However, workers sign a contract before they start work with a platform. These contracts

are often 'clickwraps' (see Section 5). Often, workers don't realise that they have signed a contract, and this is evident in Figure 19.

Given the ambiguity in the nature of the gig economy, debates on the implementation of the minimum wage, employee status for gig workers and other aspects are ubiquitous across countries. For instance, none of the countries focused on in this report considers gig workers as employees of the platform or

### Do you have a written employment contract?



**Figure 19**: (N = 1058) (Source: Authors' Own; Data: Platform Workers: Decent Rights and Pay Survey Data-WageIndicator)

<sup>\*</sup>For more country-wise and platform wise visualisations on the gig economy, please visit: https://wageindicator.org/labour-laws/platformeconomy/platform-company-data-visual

# COMPARATIVE ANALYSIS OF LABOUR LAW

has minimum wage support or mandates overtime compensation, employment status, notice period, severance pay for gig workers. On the other hand, all countries studied in this report do have laws mandating regular pay, the law against sexual harassment and written employment contracts. In the case of written employment contracts, workers usually agree to the terms and conditions via 'clickwrap agreements' wherein workers have to click the 'l agree' option on the platform application to start receiving gigs. Often, as seen in the case of India, due to language barriers, workers are unaware that they have signed in an employment contract. Further, with the exception of Spain, platforms in the aforementioned countries do not fall under the jurisdiction of the labour inspectorate. Gig workers aren't allowed paid annual leave/ vacations and aren't entitled to work injury benefits. From the five countries mentioned above, only Spain provides unemployment benefits. Further, only the Netherlands and Spain provide maternity benefits. Only in Spain and South Africa are workers covered by provisions of 'Occupational Safety and Health' legislation and are given invalidity benefit. Spain, South Africa and the Netherlands provide access to benefits for platform workers' survivors, and in Argentina, South Africa and Spain, workers are covered under the equal treatment legislation. Finally, while gig workers in the Netherlands, India and Spain have the right to collective bargaining, workers in South Africa cannot unionise (WageIndicator Foundation, 2020). These facts have been summarised in Table 2.

The gig economy presents a challenge to policymakers and legislatures around the world. The genesis of the gig economy is a recent phenomenon with little to no legislation governing key aspects such as workers' rights. With low barriers to entry for prospective workers,

Topics	State of rights for platform workers in Argentina, India, Netherlands, South Africa,	ARGENTINA	NETHER- LANDS	INDIA	SPAIN	SOUTH AFRICA
	Spain					
Minimum wage	Minimum wage legislation is not applicable to the platform work-	<i></i>	Under	X	X	Х
	ers.	ľ	Discussion			,
Regular Pay	Provisions on regular pay are covered under civil legislation in some countries for platform workers.	√	√	✓	✓	<b>√</b>
Overtime Compensation	There are no provisions in the law on premium payment to workers who work beyond certain daily and weekly limits.	Х	Х	X	X	X
Paid Vacations/ Annual leaves	Platform workers do not have access to paid annual leave or vacations except in Spain, where 'trade self-employed' have access to annual leave.	X	Х	Х	<b>√</b>	X
Employment Status	Platform workers are treated as independent contractors except where decided otherwise by the Courts.	Х	Х	Х	Х	Х

	DI 16		1		1	
Written Employ-	Platform workers generally re-					
ment Contract	ceive "clickwrap" agreements,					
	also referred to as "service agree-	✓	✓	$\checkmark$	✓	✓
	ments", which are covered under		·			
N	the Commercial and Civil Code.					
Notice Require-	There are no notice period re-					
ment	quirements for independent con-	X	X	X	Χ	X
	tractors.					
Severance Pay	There is no provision on sever-					
	ance pay on contract termination.	X	X	X	Χ	X
1	. ,					
Maternity &	Except for the Netherlands and					
Work (Income)	Spain, maternity benefits are not	Χ	✓	X	$\checkmark$	X
	available to the platform workers.					
Employer Cares	Platform workers are not covered					
	by the provisions of OSH legisla-					
		X	X	X	✓	✓
	tion except in South Africa and					
	Spain.					
Labour Inspec-	The platform workers do not fall					
tion System	under the jurisdiction of the la-	Χ	X	X	✓	X
	bour inspectorate except in Spain.	,	,	•		,
Disability/	Work injury benefit is not avail-					
Disability/						
Work Injury Ben-	able to platform workers except	Χ	X	$\checkmark$	✓	X
	in Spain.	-				
efits						
	Platform workers are eligible for a					
	state pension in the Netherlands,	$\checkmark$	✓	$\checkmark$	$\checkmark$	✓
Pension Rights	South Africa and Spain.					
9	Survivors of platform workers					
	have access to benefits in the					
Danaga danatat/		$\checkmark$	✓	X	✓	✓
Dependents'/	Netherlands, South Africa and					
Survivors' Benefit	Spain.					
	Platform workers have access to		Temporarily	X	✓	Х
Unemployment	the cessation of economic activity	X	Guaranteed	^	V	^
Benefit	benefit only in Spain.					
	Invalidity benefit is available to					
	the platform workers in South Af-	<b>J</b>	X	X	1	/
		V	^	^	V	V
Invalidity Benefit	rica and Spain.					
Sexual Harass-	Platform workers are covered un-	<b>√</b>	,	,	,	,
ment	der sexual harassment legislation.	<b>√</b>	✓	$\checkmark$	✓	✓
Пепс						
	Platform workers are covered					
	under the equal treatment legisla-	✓	X	X	✓	✓
Non Discripation		•	'	•		
Non-Discrimina-	tion in Argentina, South Africa and					
tion	Spain.					
Freedom to	Platform workers have the right					
Join and Form a	to unionise in all countries except	✓	✓	$\checkmark$	✓	X
union	South Africa.					,
Freedom of Col-	Platform workers have the right					
		V	,	,	,	, , , , , , , , , , , , , , , , , , ,
lective Bargain-	to collective bargaining in India,	X	✓	$\checkmark$	✓	Х
ing	Netherlands and Spain.		<u> </u>			

Кеу		
✓	Right covered under the legislation	
Х	Right not guaranteed under the legislation	

**Table 2**: Rights of Platform Workers in Argentina, the Netherlands, India, Spain and South Africa (WageIndicator Foundation, 2020).

# CONCLUSION

the gig economy serves as an avenue of employment opportunities for millions around the world. Yet, the gig economy workers are rarely recognised as employees, consequently leaving them out of security nets and prone to exploitation. Here, the counterargument is that gig workers shouldn't be recognised as employees. With this line of thought, the provision of benefits and security remain out of concern. The gig economy around the world is a grey area because, by definition, the platform just provides for a space to connect service providers and consumers, which allows workers to work with different platforms. In such a situation, there is little incentive or economic reasoning for platforms to offer benefits to the gig workers, which increases concerns over workers' rights and protection against exploitation.

Given the complexity of this debate, the aim of this report was to reveal gig workers' rights and work conditions with empirical evidence from different countries to identify similarities in practices. Finally, the report employed a variety of primary and secondary sources to present the necessary facts. While the report doesn't provide a resolution to the debate, it highlights the common trends in the gig economy across five countries- Argentina, South Africa, India, Spain, and the Netherlands. Across these countries, women's participation in the gig economy remains substantially low in comparison to their male counterparts.

Therefore, the opportunities presented by the gig economy remains inaccessible to women.

Furthermore, the question of social securities is pertinent, as highlighted by the results of the survey. Workers' pay largely depends on the number of 'gigs' performed, especially in India

and South Africa. However, this pay is unaccompanied by the benefits. These facts, coupled with the finding that most of the respondents only work as gig workers but not with multiple platforms, speaks to the need for decent work and pay. Given that the gig economy doesn't provide decent work and pay, most gig workers are likely to shift to platforms with better pay or shift out of the gig economy altogether, as there is evident dissatisfaction with pay. These observations are crucial because they bring out the complexity of the gig economy, which is ubiquitous in the contemporary world. Therefore, there is an urgent need to conduct primary research to understand the situation from various perspectives- be it that of the workers or the platforms or even the government. Such research can provide a greater insight that has the potential to inform policies. Country or context-specific research is essential in this aspect.

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# **APPENDIX**

NUMBER OF OBSERVATIONS			
Country	Platform	Observations (N)	
India	Uber Eats	1	
	Swiggy	64	
	Zomato	61	
	Superdaily	60	
	Bigbasket	60	
	Dunzo	63	
	Flipkart	60	
	Shadowfax	2	
	Amazon	58	
	Urbanclap	58	
	Ola	61	
	Uber	60	
	Other	37	
	Total	645	
	2.0		
Spain	Deliveroo	66	
	Just Eat	8	
	Uber Eats	27	
	Glovo	607	
	Cronoshare	74	
	Cuideo	7	
	Fiverr	22	
	Workana	43	
	Cabify	22	
	Uber	9	
	Malt	120	
	Other	26	
	Total	1031	

South Africa	Uber Eats	64
	Take A Lot	67
	SweepSouth	70
	Bolt	72
	Uber	3
	Nomad Now	1
	NoSweat	4
	Total	281
N. d. J. J.	5.1:	
Netherlands	Deliveroo	69
	Uber Eats	63
	Thuisbezorgd	69
	Miles	1
	Care.com	2
	Helping	1
	Amazon Mechanical Turk (MTurk)	60
	Clickworker	3
	Uber	5
	Total	274
Argentina	Uber Eats	60
<u> </u>	PedidosYa	199
	Rappi	356
	Glovo	99
	Iguana Fix	3
	Zolvers	2
	Workana	16
	Cabify	36
	Uber	70
	Other	30
	Total	872

**Table A-2**[Data collected in 2020]

AGE				
Country	Mean	SD		
India	26.0046	5.830555		
Spain	38.04545	10.56885		
South Africa	33.33708	6.126997		
Netherlands	24.26471	7.964115		
Argentina	28.4775	6.798427		
Sample	30.7184	9.455016		