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Indispensable but excluded. Migrant Riders in Italy, Poland, Spain, and Ukraine⁽¹⁾

WP5 Comparative Working Paper

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Abstract

This study examines the working and living conditions of migrant riders in the food delivery sector in Italy, Poland, Spain, and Ukraine, addressing three guiding questions: (1) What conditions do migrant riders experience? (2) What factors explain these conditions? (3) How effective are existing policies in protecting them? The analysis draws on a comparative qualitative design, including over one hundred interviews, focus groups, field observations, and national reports produced through a harmonized research framework.

Despite significant differences in migration regimes and labour regulations – what we have defined Italy’s *dual-track system*, Poland’s *contractual bricolage*, Spain’s *regulated exclusion*, and Ukraine’s *legal vacuum* – the findings reveal a strong convergence. Across all four contexts, migrant riders face persistent and structural precarity, characterized by legal ambiguity, unstable and inadequate income, informal or intermediary-mediated access to work, weak enforcement, and limited social protections.

This cross-country alignment is explained by three interconnected dynamics. First, the expansion of platform food delivery coincided with major waves of migration, creating a structural match between platforms’ demand for flexible labour and migrants’ urgent need for income. Second, fragmented and insufficient regulatory frameworks systematically channel migrants into irregular or semi-formal arrangements, regardless of national differences in legal design. Third, platform business strategies – subcontracting, self-employment schemes, algorithmic control, and the strategic use of legal loopholes – actively produce and entrench precarity. The growing role of intermediaries, from formal fleet partners to informal account holders, often operating in legal grey zone, further deepens dependency and exploitation.

National regulations offer limited protection. Even ambitious reforms, such as Spain’s Riders Law, fail to reach migrant riders operating informally or under subleased accounts. Across countries, the state’s regulatory capacity consistently falls short of countering the structural vulnerabilities created at the intersection of platform business models and migrant labour. Overall, the evidence shows that national regulatory differences matter far less than expected. A transnational pattern of exclusion emerges, with platforms able to exploit legal and administrative gaps in ways that transcend borders. These findings carry important implications for ongoing European debates on platform work and highlight the challenges the EU Platform Work Directive will face in improving protections for migrant riders.

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Introduction

During the pandemic, the food delivery sector emerged as a critical infrastructure, ensuring access to essential goods while much of society remained confined. At the heart of this system were thousands of riders navigating cities on bicycles and scooters. As the sector expanded rapidly, particularly through the operations of major digital platforms such as Glovo, Just Eat, Deliveroo, and Uber Eats, its workforce underwent a profound transformation. What began as a flexible job, mainly for students and locals, quickly evolved into a labour market dominated by migrant workers.

This Comparative Working Paper analyses the working and living conditions of migrant workers in the food delivery sector in four European countries: Italy, Poland, Spain, and Ukraine. In each country, a specific locality has been selected to capture the most salient trends shaping the sector and the experiences of migrant riders: Turin in Italy; Warsaw in Poland; Barcelona (and - to a lesser extent - Madrid) in Spain; and Kyiv and Kharkiv in Ukraine. The study is guided by three main questions: (1) What are the working and living conditions of migrant riders? (2) What are the factors that contribute to explaining these conditions? and (3) To what extent do policies succeed in protecting migrant riders' labour and living conditions.

To answer these questions, it is relied upon a qualitative-based research design made of two stages. Firstly, national teams have conducted fieldwork, resulting in a total of 106 interviews and 7 focus groups, plus field observation, and desk research and official documents analysis, carried out between May 2023 and June 2025¹. The initial phase of the research was carried out independently by each national team, resulting in four country reports developed using a shared analytical framework and a harmonized structure. In the second stage, these reports were examined through a comparative lens. Rather than aiming for a systematic enumeration of similarities and differences, the comparative analysis uses the national cases to highlight recurring patterns as well as key divergences shaped by distinct political, socio-economic, and cultural contexts. The goal is not to flatten complexity, but to draw out broader insights that emerge from the interplay between common trends and local specificities.

The paper is structured as follows. The first section illustrates the cases analysed. The second section describes the conditions of migrant workers observed in the cases across five main dimensions: legal status; employment security; income adequacy; rights and; protections; working and living conditions. The third one dig into the drivers and factors that help to account such conditions. Finally, it concludes with a reflection on the role of public policy in addressing migrant riders' labour precariousness in relation to the broader European debate on platform work. By situating national dynamics within this evolving European framework,

¹ Further details on data gathered and sources employed in this Comparative Working Paper can be found in national reports published under Work-package 5 and available at <https://www.dignityfirm.eu/publications/>.

the study aims to contribute to ongoing discussions on how to ensure fair working conditions and social protections for platform workers across the EU.

1. Case selection

Italy - Turin

The food delivery sector in Italy emerged in 2016 with the arrival of international platforms such as Foodora, Deliveroo, Glovo, and Uber Eats. The COVID-19 pandemic accelerated its expansion, and by 2025, the dominant actors are Just Eat, Glovo, and Deliveroo, while Foodora and Uber Eats have exited the market

Italy's regulatory framework evolved between 2019 and 2021, catalyzed by worker protests, unionization, and judicial activism. Decree 101/2019 (converted into law by Act 128/2019) introduced minimum protections, including mandatory insurance for occupational injuries and the prohibition of piecework pay. However, the law maintained the self-employment model and left substantial regulatory gaps. A so called "dual-track system" has since emerged. Just Eat employs riders under collective agreements with major unions (CGIL, CISL, UIL), applying for the Transport and Logistics contract. In contrast, Glovo and Deliveroo continue to operate under self-employment contracts, formalized through a contested agreement with the minor union UGL Rider. This dual-track has been institutionalized, with platforms maintaining their respective models between 2023 and 2025.

Initially, the workforce was composed primarily of Italian students seeking flexible part-time employment. Over time, however, the sector has seen a marked shift toward migrant labour, particularly in northern cities such as Milan and Turin. Migrant riders now represent a significant share of the workforce, although official data remains scarce. Fieldwork has identified Bangladesh, Pakistan, Afghanistan, Nigeria, Morocco, and Peru as the most represented nationalities among riders in Turin. Their legal status varies widely, from international students and long-term residents to asylum seekers and undocumented migrants.

Working conditions for migrant riders remain challenging across both tracks, particularly those with precarious legal status. Riders report limited scheduling autonomy, and exposure to physical risks. Income instability is widespread. Migrant riders struggle to secure sufficient hours, while experienced riders report declining earnings and unpaid travel and waiting time. Legal status significantly shapes their experiences, with asylum seekers and people awaiting permit renewals face heightened barriers to formal employment.

Poland – Warsaw

Poland's food delivery sector is a relatively recent but rapidly expanding segment of the labour market, particularly in urban centers such as Warsaw. Since Polish platform Pyszne.pl was founded in 2010 (acquired in 2014 by Just Eat Takeaway), followed by Uber Eats, Glovo,

Bolt Food, and others, the sector has grown significantly, with multinational platforms dominating the market.

Despite its growth, the sector remains largely unregulated. There is no specific legislation governing food delivery work², and employment relationships are characterized by a fragmented and informal structure. The sector operates under a “contractual bricolage” model, with most riders engaged through civil law contracts (*umowa zlecenie*), which fall outside the Labour Code and offer minimal labour protections. Arrangements for (more or less informal) vehicle or bicycle rental are often facilitated by intermediaries (“fleet partners” or “application partners”), who operate outside the scope of labour inspections and regulatory oversight.

Migrant workers constitute a substantial portion of the workforce, estimated to be between 30% and 50%. The majority are (administratively) regular migrants from Ukraine, Belarus, Georgia, India, and Uzbekistan, although many work under informal or semi-formal contractual arrangements. Unionization remains weak. Only Just Eat directly employs (though still under non-employment contracts) riders, enabling the formation of a recognized trade union. Other platforms rely exclusively on intermediaries, making collective bargaining nearly impossible.

Riders frequently lack written contracts, health insurance, and access to social protection. Often their working conditions are marked by long hours (often 10–14 hours per day, six to seven days a week), income instability, and exposure to physical risks, including traffic accidents and extreme weather. Public institutions have largely failed to engage with the sector with labour inspectorates facing significant challenges in enforcing regulations.

Spain – Barcelona (and Madrid)

Spain’s food delivery sector began expanding in 2015–2016, with Barcelona and Madrid becoming key hubs due to their scope and urban density. Glovo, founded in Barcelona, remains a dominant player alongside Just Eat and Uber Eats. The sector grew rapidly during the pandemic and is now sustained predominantly by migrant labour. The sector’s low entry barriers and flexible access systems have made it a common entry point into the labour market for migrants, especially those with irregular or semi-regular legal status.

The 2021 Riders Law (Royal Decree-Law 9/2021, Law 12/2021) introduced a legal presumption of employment and mandated algorithmic transparency. Just Eat, despite slowly and with certain contradictions, adapted by signing collective agreements; while Glovo

² The only area of platform work currently regulated in Poland is passenger transport through applications such as Uber. The 2020 amendment to the Road Transport Act, commonly known as *Lex Uber*, formally integrated Uber and other ride-hailing companies into the passenger transport sector. The act introduced a definition of intermediation in passenger transport services and requires intermediaries to obtain a license. Moreover, as of 17 June 2024, anyone wishing to work as a driver for a passenger transport company must hold a Polish driving license. Importantly, foreign nationals can obtain a Polish license only if they reside in Poland for at least 185 days within a given calendar year.

and Uber Eats – till 2024 – maintained a business model centered on (bogus) self-employment substantially based on subcontracting and legal loopholes. Despite regulatory advances in terms of workers' protections provided by the Riders Law, the actual implementation of the law is weak, particularly for migrants.

Migrant riders workforce includes regular migrants, asylum seekers, and undocumented persons. Riders from Pakistan, Bangladesh, and India are concentrated in Barcelona, while Venezuelans and Colombians dominate in Madrid. Subleasing of accounts is widespread, allowing those without work permits to access platform work. This practice creates exploitative relationships and legal invisibility.

Working conditions are difficult and are marked by volatile and instable income and lack of protections. Migrant riders, especially those in irregular situations, work without contracts, insurance, or union representation. Income is often below minimum wage, and occupational risks are high. The Riders Law has not resolved these structural vulnerabilities, leaving migrant riders economically essential, yet institutionally excluded.

Ukraine - Kyiv and Kharkiv

Ukraine's food delivery sector, led by Glovo since its entry in 2018, expanded rapidly until the outbreak of war in 2022. Despite the conflict, operations continued, with Kyiv and other cities remaining active hubs. Ukraine became one of the company's most profitable markets globally, yet the sector remains informal and unregulated.

The country lacks a legal framework recognizing platform workers as employees. Riders are classified as independent contractors (FOPs) or operate under pseudo-contractual arrangements, often without formal employment status or protection. The 2019 death of a courier in Kharkiv sparked protests and legal action, but the 2025 court ruling reaffirmed the absence of employment relationships, restating the platforms' model. The state has adopted a non-interventionist position: labour inspections are rare, and ministries responsible for employment and social protection remain passive. Although EU inputs have prompted some discussion of reform, no substantive legal changes have been enacted.

Riders workforce includes Ukrainian students, internally displaced persons, and migrants from – in order of relevance – Belarus, Georgia, India and Uzbekistan. Many migrants lack legal status and cannot register as FOPs, forcing them to work under others' accounts and yield part of their income. Migrants face additional barriers in accessing banking services, housing, and healthcare. While national workers also experience precarity, migrants are disproportionately affected due to legal invisibility and dependence on intermediaries. The war has intensified these dynamics.

Working conditions are marked by long hours (often 80–90 per week) and physical exhaustion. Income is unstable, with no guaranteed minimum wage, and riders bearing all operational costs. Insurance coverage is minimal and difficult to claim, and there is no access

to paid leave, sick pay, or pension contributions. Migrant riders tend to be excluded from union representation and have to rely on informal networks for support.

Table – Case selection

	Italy	Poland	Spain	Ukraine
Sector Start	2016	2010 (Pyszne.pl)	2015–2016	2018 (Glovo)
Main Platforms	Just Eat, Glovo, Deliveroo	Pyszne.pl, Glovo, Uber Eats, Bolt	Glovo, Just Eat, Uber Eats	Glovo
Regulation	Dual-track (employed/self-employed)	No specific law; civil contracts	Riders Law (2021)	No regulation; informal
Contract Types	Employment, self-employment, informal	Civil law, rental, informal	Employment, self-employment, subleasing	Informal, FOP, subleasing
Migrant Share	High in cities	30–50%	Majority	~5% (post-war)
Legal Status	Mixed (regular, asylum, undocumented)	Mostly regular	Mixed (regular, asylum, undocumented)	Mostly irregular
Key Issues	Dual system, legal ambiguity	Fragmentation, lack of oversight	Subleasing, low pay, algorithmic control	Legal invisibility, no protections
State Role	Passive post-2021	Passive, ineffective inspections	Active legislator, weak enforcement	Non-interventionist

The four cases reveal crucial differences in terms of both migrant workforce’s characteristics and regulatory frameworks (i.e., Italy’s *dual-track*, Spain’s *regulated exclusion*, Poland’s *contractual bricolage*, and Ukraine’s *legal vacuum*). However, across all cases, migrant riders face similar working conditions and vulnerabilities: legal ambiguity, income instability, and lack of protection. In this regard, it is important to note that, provided limitations of the scope of inference beyond cases, the patterns and dynamics identified in this analysis point to broader dynamics that appear to transcend local specificities. In this sense, many of the observations gathered here seem to provide empirical and theoretical insights significant to other urban contexts within the same countries, especially in large metropolitan areas where platform-mediated food delivery work is most prevalent.

2. Migrant riders’ working and living conditions

This Comparative Working Paper hinges upon the Work-package 5’s core concept of labour precariousness, understood as a multidimensional condition marked by instability, lack of protection, insecurity, and socio-economic vulnerability (Rodgers & Rodgers, 1989). This

approach aligns with a broader literature that has defined precariousness in terms of low wages (Sassen-Koob, 1981), unfree labour (Miles, 1987), and flexibility that allows employers to rapidly adjust to changes in demand (Caviedes, 2010). As Kreshpaj et al. (2020) argue, precariousness is not a static or uniform condition, but rather a spectrum shaped by intersecting legal, economic, and social factors.

This concept is operationalized into five analytical dimensions. First, legal status, which refers to the degree of compliance with residence and work permit requirements, as well as the existence of a formal employment relationship. Second, employment security, which refers to the nature and stability of contractual arrangements, the identification of the employer, and the presence of multiple or part-time jobs. Third, income adequacy, encompassing both the sufficiency and stability of earnings, including deductions, volatility, and hidden costs. Fourth, rights and protections, referring not only to formal entitlements, such as union representation, social security, and labour standards, but also to their effective enforcement in practice. Finally, working and living conditions, which cover psychosocial and material aspects such as control over working time, exposure to physical risks, long hours, and housing precarity.

2.1 Overall assessment

As highlighted in the first section, the four national contexts present distinct regulatory frameworks and migration regimes. However, what emerges as particularly striking is their similarities in the precarious working conditions experienced by migrant riders. Migrant riders constitute a distinct segment of the workforce that is systematically excluded from social rights and socio-economic stability. Across the four countries analysed, migrant riders are overrepresented in the most precarious contractual arrangements. Their legal/administrative precarity intensifies their vulnerability, exposing them to exploitation. Many migrant riders support families in their countries of origin, repay debts incurred during migration, or lack access to alternative employment due to language barriers, discrimination, or lack of recognition of qualifications. These conditions create a workforce that is not only precarious, but also substantially dependent on platform work for survival.

Platform delivery work is often perceived by migrants as the most accessible, if not the only option available, while pursuing administrative regularization or better employment. In Spain and Italy, migrants describe it as “the best among the worst options,” offering immediate income with minimal bureaucratic barriers. In Poland and Ukraine, it represents a survival strategy for migrant workers excluded from other sectors.

While national/non-migrants riders may also experience precariousness, as observed in all the cases, the situation is consistently worse for migrants due to their legal status, limited access to formal employment, and socio-economic marginalization.

2.2 Legal Status

Legal status is a central axis of precarity for migrant riders. Across all national contexts the legal vulnerability of migrant workers intersects with fragmented or restrictive migration regimes to produce a spectrum of irregularity. This spectrum encompasses both administrative and employment/contractual dimensions, resulting in a persistent and substantial presence of workers in precarious legal and labour conditions. These include a) regular residents with formal employment contracts; b) migrants with limited work authorization (including international students); c) asylum seekers awaiting decisions, or who can only work part time); and d) undocumented individuals.

Platforms' employment access systems, designed for flexibility and minimal oversight, facilitate widespread informal access to work. In Spain, Italy, and Ukraine, this occurs primarily through account subleasing. "The account is not mine. It's my friend's, he has papers, I don't. I pay every week, like thirty percent, you know? The company... doesn't look, doesn't ask, doesn't control anything. Many of my friends do the same, we all work with someone else's account. If you're lucky, the owner is good... if not, they take your money, disconnect you. [SPA_WP5_MIG_08]. While in Poland it occurs mainly via intermediary-based contracts. "The answer is obvious, because it is just a very low entry point, (...) all you have to do, just to have a smartphone. (...) there are even delivery workers who work on foot, so you have to have a smartphone to install an app and to register as an employee in a particular app. You don't have to know the language because the app can be in your language, you don't have to have social contacts, meaning that you do not have to know anyone you know who would recommend you to the CEO of a certain company and you don't have to have colleagues. You can be very socially alienated, really, you don't have to talk to anybody, you can be an introvert. (...)" [POL_WP5_D_NS_06]. These mechanisms allow migrants to bypass formal registration but expose them to exploitation and legal invisibility. This legal ambiguity is not merely a result of regulatory gaps; it is actively produced and exploited by platforms, whose systems accommodate and benefit from the legal precarity of migrant workers.

In Italy, the dual-track system allows for both employee and self-employed statuses, but migrants with precarious legal status (asylum seekers, undocumented) face significant barriers to formal employment. Platforms relying on employment model, such as Foodora, require formal identification permits, effectively excluding migrants with precarious legal status. As a result, many migrant riders - particularly asylum seekers who are authorized to stay but lack formal documentation - turn to platforms like Glovo, which operate under a self-employment model and impose fewer bureaucratic barriers. Many work informally, thus, using others' accounts or relying on temporary contracts, which exacerbates their vulnerability. In Spain, the legal status of migrant riders spans a continuum: from regularized workers with contracts, to asylum seekers with temporary documentation, to undocumented migrants working with subleased accounts. The Riders Law introduced a presumption of employment, but its implementation has been uneven, and many migrants remain excluded

from its protections. In Poland, most migrants have regular residence status, but employment regularization is hindered by the multiplicity of informal contracts. Civil law contracts and vehicle rental agreements offer no real protection, and the lack of clear employment relationships pushes many into irregular employment. In Ukraine, the situation appears even more precarious. Most riders are not registered as self-employed and work informally.

Migrant riders in the food delivery sector occupy a wide spectrum of legal statuses, ranging from regular residents with formal contracts to asylum seekers and undocumented workers. While some hold valid permits, many access work informally (often through account subleasing or intermediaries) resulting in widespread legal ambiguity. This structural vulnerability, actively enabled by platform systems, exposes them to exploitation and exclusion from formal protections.

2.3. Employment Insecurity

Employment insecurity is a defining and transversal feature of migrant riders' experiences in all four countries. The platforms' reliance on non-standard, flexible, and often informal contractual arrangements systematically undermines job stability and protection. Migrant riders are extremely affected by this insecurity due to their exclusion from formal labour markets, dependency on intermediaries, and exposure to algorithmic management. The absence of guaranteed hours, the prevalence of on-demand scheduling, and the constant threat of account deactivation (or suspension) create a labour environment characterized by volatility and uncertainty. Even where formal contracts exist, they are often short-term, part-time, or contingent on performance metrics that are opaque and arbitrarily enforced. Migrant riders cope with this insecurity by maximizing working hours, working for multiple platforms, and relying on informal networks for information and support. However, these strategies do little to mitigate the underlying structural instability, which is a feature of the platform business model and is reinforced by the lack of effective regulatory oversight.

Across countries, this instability takes different forms but follows a shared logic. In all cases, migrant riders are disproportionately exposed to underemployment, contractual insecurity, and temporariness. In Italy, even formally employed riders under Just Eat face part-time contracts and limited hours, while those on Glovo and Deliveroo operate under self-employment with little autonomy.³ Spain's model is dominated by self-employment and subcontracting, with undocumented migrants relying on subleased accounts and facing total legal invisibility. "You never know with this job. I work with a friend's account because I have no

³ In July 2025, Glovo introduced a "free log-in" system in Turin, replacing the ranked shift-booking model. This change, likely prompted by court rulings recognizing couriers as employees, allows riders to log in at any time. While it removes scheduling constraints, it intensifies competition and pressures workers to remain constantly available.

papers, but any day, the owner can take it back or the company can block it. There's no guarantee, nothing. Sometimes I work all week, and suddenly there is no account, no money. Always worried, always looking for another account, asking friends." [SPA_WP5_MIG_10]. In Poland, civil law and rental contracts mediated by intermediaries offer no job security, and slot-based scheduling tied to performance metrics deepens unpredictability. Ukraine's riders - both national and foreign - work without formal contracts, often under others' accounts, and face arbitrary suspensions and unstable schedules. "One of the biggest problems, especially now with Bolt Food, is account blocking, basically firing people for no valid reason. There are loopholes that allow dishonest customers to make fraudulent complaints, and the company will often take the customer's side without any real investigation. It doesn't matter that the courier worked for years and never received a complaint. Bolt Food can still terminate their account at any time. Then that person is left without a job and has to figure out another way to earn a living. Usually, they ask a friend or relative to register a new account in their name, and then they keep working under that account." [UA-WP5-05_national worker].

Migrant riders face pervasive employment insecurity due to informal or unstable contracts, on-demand scheduling, and the constant risk of account deactivation. Across countries, platform models based on self-employment, subcontracting, or intermediaries systematically undermine employment stability.

2.4. Income Inadequacy

In all the countries analysed income inadequacy marks migrant riders' conditions. The promise of flexible, quick income is systematically undermined by low pay rates, high operational costs, and the externalization of expenses to the workers. Migrant riders face additional deductions that further erode their net earnings, such as commissions to intermediaries or account holders, and/or equipment rental fees. This situation is well described by a representative of an informal advocacy group in Poland. "If you don't have a vehicle, you can rent one, and the cost will be deducted from your future earnings. You don't have clothing; they'll deduct that from your future wages ..." [WP5_D_NS_06]. The volatility of demand, dynamic pricing, and the absence of guaranteed minimum wages mean that even long hours do not translate into adequate or stable income. The result is a cycle of economic marginalization, where riders are forced to work excessive hours, often at the expense of their health and well-being, just to meet basic subsistence needs.

Across contexts, income instability is shaped by platform-specific mechanisms and legal constraints. In Spain and Ukraine, undocumented riders working under subleased accounts often lose up to 30% of their earnings to account holders, while also covering equipment and transport costs. "You work all day [...] twelve, fourteen hours, but the money is never enough. First, you pay the account owner, then bike and jacket. After all [...] If there are not enough

orders, you wait, you lose time, but you still have to pay. Every week [...] I am worried about to pay rent, and how send money home? But I work hard.” [SPA_WP5_MIG_13]. In Poland, earnings depend on fluctuating multipliers and seasonal bonuses, with riders working 10–14 hours daily to reach subsistence levels. Italy’s dual-track system offers formal hourly wages under Just Eat, but limited hours and declining rates over time leave many riders underemployed and reliant on multiple platforms. In all cases, the absence of minimum income guarantees combined with informal arrangements, reinforces a structurally unstable earning model for migrant workers.

Migrant riders experience severe income inadequacy due to low and unstable pay, high operational costs, and widespread deductions, such as commissions to intermediaries or account holders, that significantly reduce net earnings. Even long working hours rarely ensure subsistence, reinforcing a cycle of economic vulnerability.

2.5. Lack of Rights and Protections

Migrant riders across Spain, Italy, Poland, and Ukraine face systematic exclusion from labour rights and social protections typically associated with formal employment. This exclusion is both structural and institutional, rooted in legal ambiguity, fragmented contractual arrangements, and weak enforcement mechanisms. Migrant workers are particularly disadvantaged due to their often-precarious administrative status, limited access to legal support, and barriers to union representation. Additionally, the limited recognition of skills and the narrow skill structure required by platform work further entrench workers’ dependency on these jobs.⁴ The result is a labour sector where exploitation, wage theft, and unsafe working conditions persist, and where riders have minimal recourse to challenge unfair treatment. The sector’s informality and dispersion further undermine collective organization, leaving migrant workers isolated and unprotected.

Despite national differences, the lack of enforceable rights and protections follows a convergent pattern. In Spain, the Riders Law introduced formal employment presumption, but platforms like Glovo circumvented it through subcontracting and legal loopholes, leaving many migrant riders excluded from protections. In Italy, Just Eat offers formal contracts under collective agreements, yet many migrants remain outside this framework due to legal status or limited working hours, while Glovo and Deliveroo continue to operate under self-employment models. As noted by a representative of the Prefecture of Turin (i.e., the local representative of the Italian Ministry of Interior): “A different regulatory framework is needed... but at the same time also social interventions is needed. If I don’t offer alternative possibilities to be able to earn a salary somehow... that system will continue to exist because it offers you something that the institutional system [doesn’t offer], even under extremely disadvantageous conditions” [ITA_WP5_2_EXP_10].

⁴ The platforms’ failure to acknowledge or develop broader competencies means that migrant riders remain confined to roles with minimal skill demands, restricting their opportunities for advancement and perpetuating their reliance on precarious platform work.

In Poland, reliance on civil and rental contracts denies riders access to health insurance, paid leave, and pension contributions; union coverage is minimal, and regulatory oversight is weak. As one rider explained: “..we don't have any rules and regulations that specify these limits, we don't know how many of these orders I can rewrite, after which I'll get some consequences. I'm not sure, but I'll do two rewrites and then I'll be blocked, or you can do four. (...) they don't care whether the riders know about it, whether they have that information or not.” [POL_WP5_D_NS_03].

In Ukraine, the absence of a legal definition of employment allows platforms to deny responsibility even in cases of injury or death. Migrants working under subleased accounts or informal arrangements lack access to social security, union representation, and legal redress. “[...] Couriers regularly contact me asking to help them start a fundraiser for medical treatment. That means insurance payouts simply don't work the way they should.” [UA_Expert focus group National worker 2025]. Another interviewee recalled: “There was a tragic case in Kyiv a few years ago: a Glovo courier – an older man in his 40s with a family that he had to provide for – was working under someone else's name when he was killed in a road accident. Because he wasn't registered under his own name, his family couldn't claim any compensation or benefits. [UA-WP5-05_national worker].

Across all contexts, platforms exploit legal ambiguity and administrative fragmentation to externalize risk and avoid employer obligations, consolidating a system where accountability is minimal and rights and protections often remain inaccessible.

2.6 Work and Living Conditions

The everyday reality of migrant riders is characterized by difficult and often degrading work and living conditions. “The working conditions and the wages in this job are so low that only the most desperate people, who need to get any money to survive as soon as possible, who simply have no way out, take this job.” [POL_WP5_D_NS_06].

The physical demands of delivery work (long hours, exposure to traffic hazards, extreme weather, and the risk of accidents) are often deepened by the absence of protective equipment, insurance, or access to safe rest areas. “And we, as riders, quite often pick up groceries from shops and drag these bags without a lift up to the high floor, in old houses. Well, and imagine you go up there with that 15kg bag, many times a day to the fourth floor. Of course, it's bad for our backs, it's very bad for me for example, and in my opinion, if you work like that for 10 years or more, you're guaranteed to have some health problems in the future.” [POL_WP5_D_NS_03]. In some cases, riders are also exposed to violence and extreme vulnerability, particularly when lacking legal protections or insurance. “One rider was thrown out of a window. He survived, and we collected money for his treatment. (...) He ended up with the wrong people, and it happened to him. And he had no insurance. He asked for help – we understand each other; we are all in the same conditions – we should help. (...) there was

information on all the groups and everyone who could, helped. Some amount was collected to support him.” [POL_ WP5_D_W_06].

Migrant riders’ exclusion from social protections and institutional support leaves them with few alternatives. The intense demands of platform work, combined with economic insecurity and social isolation, contribute to chronic fatigue, mental health strain, and a cycle of overwork and burnout.

Living conditions further compound this precarity. Migrant riders often live in overcrowded housing, share apartments with other riders in similar situations, and lack access to stable accommodation. “I live with many people in one flat. Sometimes six, seven... it depends... all riders. There is not much space, not much privacy, always someone coming or going to work. If you lose the job, maybe you lose the place too. [...] Nobody has a contract for the house, just pay cash to a friend.” [SPA_ WP5_MIG_13]. In Italy, riders struggle to organise their schedules and face performance-based slot allocation that limits their ability to rest or plan. In Spain, housing is expensive and often tied to informal networks, reinforcing dependency and limiting mobility. In Ukraine, undocumented migrants avoid contact with authorities and live in informal arrangements, further increasing their vulnerability.

Migrant riders endure harsh working and living conditions marked by long hours, physical strain, lack of rest, and inadequate housing, with their exclusion from social protections and institutional support reinforcing cycles of overwork, isolation, and vulnerability.

3. Factors and reasons behind migrant riders’ conditions

3.1 The Alignment Between Sector Growth and Immigration Inflow

A central driver of migrant precarity in the food delivery sector is the “historical convergence” between the rapid growth of platform-based markets and intensified migration flows. In all four countries analysed, in fact, the expansion of food delivery platforms closely aligned with key moments of increased immigration. Despite each context displaying its own specific dynamic, it is possible to identify a shared pattern.

In Italy, the proliferation of platforms followed the post-2015 surge in arrivals from North and Sub-Saharan Africa, offering newly arrived migrants a low-barrier entry into the labour market, in the absence of specific regulation. In Poland, the sector’s growth paralleled the steady influx of Ukrainian migrants since 2013 and intensified by the 2022 Russian invasion⁵;

⁵ However, this relation must be qualified: while the war-related migration affected the broader economy, it did not necessarily translate into increased participation in the delivery sector, as many of the post-2022 arrivals were women. In this regards, the most significant catalyst for growth in food delivery platform seems

here, food delivery became the most accessible job for migrants, facilitated by minimal requirements and widespread use of civil law and rental contracts. In Spain, the consolidation of the sector coincided with the arrival of Venezuelan asylum seekers between 2016 and 2017, who quickly became a significant share of the rider workforce, especially in Madrid; the lack of effective regulation enabled platforms to absorb these migrants through mechanisms such as account subleasing. Ukraine's platform economy, meanwhile, expanded amidst internal displacement and wartime disruption, drawing in internally displaced persons, rejected asylum seekers, and migrants from Central Asia and Africa as other employment options collapsed and state support was lacking.

This synchronization between sector growth and intensified migration is not incidental. The rapid expansion of food delivery platforms, in the absence of specific legislative regulation, created a structural alignment between the labour demands of platforms and the urgent livelihood strategies of migrants. Platforms, seeking a flexible and disposable workforce, found in newly arrived migrants a population willing (and compelled) to accept unstable, low-paid, and unprotected work. Migrants, in turn, were drawn into the sector by the promise of immediate income and minimal entry barriers, but quickly found themselves trapped in cycles of insecurity, dependency, and exploitation. The lack of effective regulation, combined with the structural vulnerabilities of migrant populations, enabled platforms to externalize risks and responsibilities, institutionalizing poor working conditions and legal ambiguity as defining features of the sector.

The rapid expansion of food delivery platforms has coincided with key waves of immigration, creating a structural alignment between the sector's demand for a flexible workforce and migrants' urgent need for income. This convergence has enabled platforms to absorb newly arrived migrants into precarious, low-paid, and unregulated work.

3.2 Convergence Between Market Demand and Migrants' Needs

Another core factor of migrant precarity in the food delivery sector points to the convergence between the operational imperatives of food delivery platforms and the survival strategies of migrant workers. Platforms require a flexible, available workforce to meet volatile demand, while migrants - especially those in legally and/or economically precarious positions - seek immediate, low-barrier access to income. This convergence between market demand and migrants' needs is reinforced by minimal entry requirements, lack of oversight, and the absence of effective regulatory controls to work as riders. For many migrant riders, hence, platform-mediated work often represents the most immediate and accessible route to income.

to have been the COVID-19 pandemic (for further details on this see, for instance, Deszczyński and Beręsewicz, 2021).

This convergence manifests differently across national contexts. In Poland, the “contractual bricolage” model relies on civil law and rental contracts, allowing platforms and intermediaries to exploit legal ambiguities and push migrants into informal, unstable arrangements. Italy’s dual-track system divides workers between formal employment and self-employment, with migrants disproportionately concentrated in the most insecure roles. In Ukraine, the informal platform economy – also beyond food delivery sector – absorbs internally displaced persons and migrants excluded from other sectors, while in Spain, platforms capitalize on legal loopholes and account subleasing to integrate migrants into the workforce without extending rights or protections.

Despite these regulatory differences, a common pattern emerges platforms systematically capitalize on migrants’ vulnerabilities through opaque contracts, subcontracting, and informal arrangements. These mechanisms facilitate access to labour but also produce a regime of fragmented inclusion, where migrants are economically integrated yet remain socially and legally excluded. Economic necessity compels workers to accept unstable, underpaid, and often exploitative conditions, while platforms externalize risks and responsibilities. In this context, food delivery sector does not merely reflect existing inequalities, it seems rather to actively reproduce and deepen them.

The structural match between platforms’ need for a flexible, low-cost workforce and migrants’ urgent search for income has fostered a regime of fragmented inclusion, where migrants are economically integrated through informal and opaque arrangements but remain socially and legally excluded.

3.3. Regulatory Fragmentation and the Production of Precarity

A third factor refers to the capacity of platforms to absorb migrant labour through regulatory gaps and fragmented normative frameworks. Despite significant differences in labour, migration, and asylum regulations across the countries analysed, platforms consistently recruit migrant populations whose legal status restricts access to formal employment. This convergence reveals how platform economies thrive on the structural vulnerabilities produced by national legal frameworks.

Spain’s regulatory framework, despite the introduction of the Riders Law and its presumption of employment, continues to generate categories of migrants excluded from formal labour markets. These include asylum seekers awaiting work authorization, rejected applicants and overstayers, all of which tend to rely on subleased accounts to access platform work. Italy, while operating under a different labour regime, similarly produces exclusion through its migration system. In fact, its dual-track model fails to accommodate migrants without valid residence permits or those with limited working hours, leaving many in informal or semi-formal arrangements. In Poland, the legal infrastructure of precarity in the sector is anchored in the absence of labour regulation. The widespread use of civil law contracts

places workers outside the scope of the Labour Code. Migrants, particularly those unfamiliar with the language or legal system, are recruited through intermediaries who offer simplified access but obscure the employment relationship. In Ukraine, while labour law has remained silent on platform work, migration regulation (particularly in wartime) has produced new categories of excluded migrants that food delivery platforms have readily absorbed.

Although the legal origins of irregularity differ — stemming from migration and asylum law in Spain and Italy, labour deregulation in Poland, and the absence of legal recognition in Ukraine — the effect is the same: gaps and ambiguities in national regulatory frameworks systematically produce irregularity, providing platforms with a precarious workforce that can be easily absorbed under poor and exploitative conditions.

Despite national differences, fragmented and inadequate regulatory frameworks across countries systematically produce irregularity, enabling platforms to recruit migrants excluded from formal employment and to institutionalise precarious work through legal loopholes and weak oversight.

3.4. The Production and Entrenchment of Precarity in Food Delivery: Platforms' Agency and The Limits of Counteraction

Platform-based food delivery has emerged as a paradigmatic site of migrant work precarity, shaped by convergent business strategies and the persistent weakness of countervailing forces. As regards the role played by platforms' agency, it is possible to identify four interrelated factors/dynamics:

First, platforms systematically avoid direct employment relationships by relying on subcontracting chains, intermediaries, or self-employment models. In Poland and Ukraine, the use of “fleet partners,” “billing partners,” or intermediaries allows platforms to externalize employer responsibilities and fragment accountability, making it nearly impossible for workers to identify or negotiate with a clear employer. In Spain and Italy, the proliferation of self-employment and subcontracting arrangements similarly enables platforms to circumvent labour protections and shift risks onto workers, while maintaining the appearance of legal compliance.

Second, the promotion of self-employment is not merely a “legal fiction” but a deliberate strategy to transfer costs and risks (such as taxes, social security contributions, equipment, and insurance) onto workers. Migrant riders, often with limited alternatives, are compelled to accept these terms, which result in unstable incomes, lack of paid leave, and exclusion from social protection systems. In Spain, the widespread practice of account subleasing exposes undocumented migrants to extreme dependency and exploitation, while in Italy and Poland, the self-employment model is often the only available entry point into the labour market for those with precarious legal status.

Third, algorithmic management is deployed to exert control over workers' performance, access to work, and income. Platforms use opaque rating systems, dynamic pricing, and automated account suspensions to discipline labour, intensifying competition among workers and fostering a climate of uncertainty and fear. The promise of flexibility is contradicted by the reality of algorithmic surveillance, unpredictable workloads, and the constant threat of deactivation. This technological mediation not only fragments the workforce but also undermines collective action and bargaining power.

Fourth, platforms exploit legal ambiguity and regulatory gaps to deny responsibility and suppress rights. By positioning themselves as mere "technology providers" or "marketplaces," platforms evade the obligations of employers and benefit from the slow adaptation of labour law to new forms of work. In Ukraine, the absence of a clear legal definition of employment in the platform economy has allowed platforms to avoid liability even in cases of workplace death, while in Poland, the use of civil law contracts outside the labour code leaves workers without enforceable rights or protections. Across all four countries, platforms frame their practices through narratives of entrepreneurship, flexibility, and opportunity, masking the structural exploitation embedded in their models.

This situation is further entrenched by the weakness and fragmentation of counterforces and other (alternative) actors. State actors (governments, labour inspectorates, and regulatory agencies above all) have largely failed to provide effective oversight and protection for migrants riders. In Spain, the implementation of the Riders has been uneven and very difficult, especially in targeting migrants' problems in practice, with platforms circumventing the law through subcontracting and legal appeals. In Italy, judicial activism and union negotiations have produced partial reforms, yet the dual-track system of employment and self-employment has remained entrenched, and policymakers have largely deferred further intervention. In Poland and Ukraine, state institutions have remained passive, citing legal limitations and avoiding enforcement; inspections are rare, often limited to document checks, and hampered by the virtual nature of intermediaries and the difficulty of establishing employment relationships.

Non-state actors, such as trade unions, cooperatives, grassroots organizations, and legal advocates, have emerged as key defenders of migrant riders but face significant obstacles. Their impact is limited by fragmentation, resource constraints, and the structural isolation of platform workers. In Spain and Italy, cooperatives and grassroots associations have developed alternative models and provided legal advocacy, but their reach remains local and their capacity to scale is constrained by market pressures and lack of institutional support. In Poland and Ukraine, unionization rates are extremely low, and collective action is hampered by high turnover, spatial dispersion, and the individualized nature of platform work. Informal networks and digital communities offer some support and solidarity, but they cannot substitute for robust institutional protections or sector-wide bargaining power.

The persistence of migrant precarity in food delivery sector is, thus, not only the result of platform strategies but also of the absence of credible, large-scale alternatives. The weakness of state intervention, the fragmentation of non-state actors, and the structural barriers to collective organization have left migrant workers with few avenues for redress or improvement.

Platforms actively shape migrant precarity through subcontracting, self-employment, algorithmic control, and legal ambiguity, while weak state enforcement and fragmented non-state responses have failed to counterbalance these strategies, leaving riders with little protection and collective power

3.5. A New Layer of Intermediaries

Among the various actors shaping the food delivery sector, intermediaries deserve special attention for their pivotal role in structuring the everyday realities of migrant riders. While platforms themselves have developed sophisticated strategies to externalize risk and responsibility, it is the emergence and consolidation of a new layer of intermediaries (ranging from informal account holders to formalized “fleet partners”) that has fundamentally transformed the landscape of migrant precarity across the countries analysis. These actors operate at the intersection of digital platforms, migration regimes, and informal economies. Their functions are diverse: they mediate access to platform work, structure contractual relationships, provide legal and administrative consultancy, and often rent work equipment.

A particularly salient and structurally embedded practice is the subleasing of platform accounts, which has become widespread in Italy, Spain, and Ukraine. Here, migrants without legal status or work authorization rent accounts from other riders who possess the necessary documentation. This arrangement, initially rooted in kinship or ethnic support networks, provided a crucial mechanism for accessing income-generating opportunities in the absence of regular labour market channels. Over time, however, these practices have scaled up and become institutionalized (albeit informally), evolving into mechanisms of control and exploitation. Account holders retain control over platform interfaces and payment flows, often charging “royalties” of up to 30% of earnings, and can arbitrarily disconnect sublessees or withhold their pay. What began as a survival strategy has thus become a source of dependency, vulnerability, and intra-community exploitation.

In Poland, the intermediary model has taken a more formalized shape. “Fleet partners” act as registered businesses contracting with platforms and then “employing” riders under civil or rental contracts. While this arrangement may appear more regulated, in practice it mirrors the exploitative dynamics of informal account subleasing: intermediaries control access to work, set contractual terms, and deduct fees for equipment and administrative services, further eroding riders’ already meager incomes. Riders are often unaware of the type of contract they have signed or the rights it entails, and many accept informal arrangements in

exchange for the promise of higher take-home pay, remaining largely unprotected and invisible to labour inspectors.

The role of intermediaries in deepening migrant precarity is thus twofold. On the one hand, they enable access to the platform economy for those excluded by legal or administrative barriers, providing a crucial entry point into the labour market. On the other, they reproduce and amplify the migrant riders' vulnerabilities, fostering dependency and perpetuating a segmented, disposable workforce. The normalization of account subleasing and intermediary-based contracting has created a parallel labour market governed by informal rules, where legal invisibility and economic exploitation are the norm. Platforms benefit from this arrangement by maintaining a flexible, low-cost workforce without assuming legal responsibility for employment conditions.

Importantly, these dynamics are not static. As subleasing and intermediary practices have scaled up and institutionalized, they have begun to generate tensions within migrant communities themselves. In Spain and Italy, for example, what began as networks of mutual aid have evolved into hierarchies of control and mistrust, with account holders exercising power over sublessees and disputes over earnings or disconnections leading to fragmentation and internal conflict. In Poland, the proliferation of intermediaries has contributed to a highly individualized and competitive environment, undermining solidarity and collective action among riders.

Although often rooted in informal solidarity and mutual aid, the rise of intermediaries has evolved into a system of dependency and control, creating a parallel labour market where migrant riders face legal invisibility, economic exploitation, and limited autonomy.

4. Conclusion

This Comparative Working Paper has examined the working and living conditions of migrant riders in the food delivery sector across Italy, Poland, Spain, and Ukraine. Despite the diversity of national contexts, migration profiles and regulatory frameworks - ranging from Italy's "dual-track" regulatory system, Poland's "contractual bricolage", Spain's "regulated exclusion", to Ukraine's "legal vacuum" - the findings reveal a striking convergence in outcomes. Migrant riders in all four countries face structurally similar forms of precarity: unstable income, legal ambiguity, lack of protections, and exclusion from social rights.

The analysis demonstrates that platform work does not offer a pathway to economic integration or upward mobility for migrant workers. Instead, it entrenches them in cycles of socio-economic marginalization. Digital platforms actively recruit from migrant labour pools shaped by restrictive migration regimes and limited access to formal employment. Whether

through subcontracting, self-employment, or account subleasing, platforms exploit legal ambiguity to externalize responsibility and minimize costs.

Several factors drive these conditions. First, the alignment between platform expansion and intensified migration flows has created a structural match between market demand and migrants' urgent need for income. Second, platforms capitalize on regulatory fragmentation, navigating legal loopholes to institutionalize precarious work. Third, the emergence of intermediaries (both formal and informal) has deepened exploitation. These actors mediate access to platform work, often through opaque and informal arrangements that reinforce dependency and intra-community tensions. Practices such as account subleasing, while initially survival strategies, have evolved into mechanisms of control that reproduce vulnerability within migrant communities.

Importantly, the analysis highlights the limited capacity of state actors to address these challenges. Public institutions, from government actors to labour inspectorates often lack the mandate or resources to intervene effectively. While courts can sanction individual cases and exert pressure on platforms, they cannot alter the structural legal frameworks that sustain precarity. The persistence of the self-employment model, enabled by national legislation, leaves local authorities ill-equipped to enforce protections or regulate platform labour meaningfully.

In this context, the EU Platform Work Directive (Directive (EU) 2024/1234) offers a critical opportunity for reform. Its presumption of employment (Article 5) shifts the burden of proof onto platforms, enabling reclassification and liability claims. It introduces algorithmic transparency, data rights, and collective protections (even for self-employed workers) potentially transforming conditions in countries lacking sector-specific regulation. For platforms, this implies significant operational changes, including the need to formalize employment relationships and comply with labour standards.

However, the Directive's effectiveness hinges on national implementation. As a minimum harmonisation instrument, it leaves wide discretion to Member States. This risks fragmented enforcement, narrow thresholds, and uneven coverage. There is concern that some governments may introduce overly restrictive criteria for triggering the employment presumption or rely on weak enforcement mechanisms that fail to address the collective dimension of platform work (Aloisi and Rainone 2024). Spain's experience with the Riders Law illustrates these risks: despite anticipating many of the Directive's provisions, its implementation has failed to protect migrant workers in practice. Legal protections remain inaccessible to those working under subleased accounts or informal arrangements.

This highlights a critical gap. Like many national labour laws, the Directive tends to "assume" the administrative regularity of workers. As the Spanish case shows, however, this assumption cannot be taken for granted with migrant riders. And it is especially problematic in practice, where irregular or semi-regular migrant workers are also the most difficult to reach through

formal protections. Without targeted complementary and executive measures that address these specific conditions, the Directive may struggle to fully deliver on its promise of inclusion when migrant workers are concerned.

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ABOUT DignityFIRM

Towards becoming sustainable and resilient societies we must address the structural contradictions between our societies' exclusion of migrant workers and their substantive role in producing our food.

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