



# Precarious Work and Legal Ambiguity Affecting Labour Migrants in Ukraine

WP5 Working Paper

Authors:

**Yevheniia Hryhorieva, Iryna Sushko**

Europe without barriers



This project has been funded by the European Union's Horizon 2020 research and innovation programme under grant agreement No 101094652

## Authors

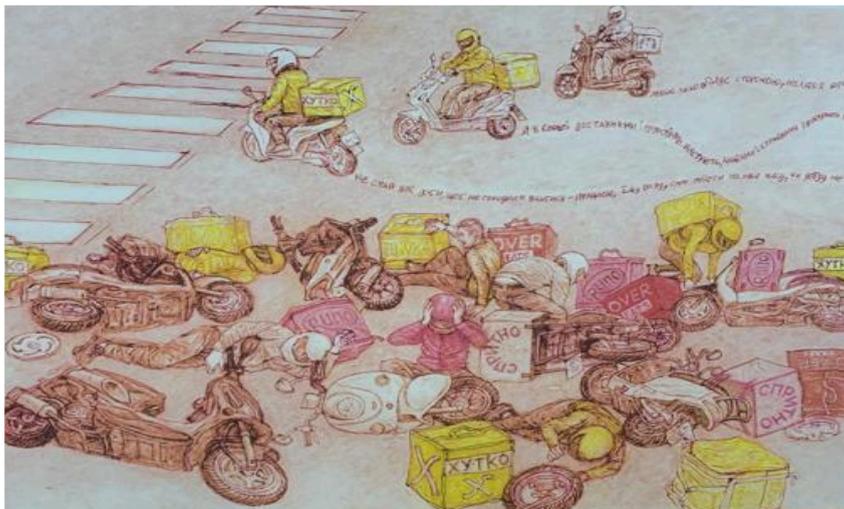
Yevheniia Hryhorieva, Iryna Sushko, Europe Without Barriers

## Layout and design

Olha Kovalenko

## Acknowledgements

The authors would like to thank all interview and focus group participants for sharing their experiences and insights. We are also grateful to the DignityFIRM project partners for their support and feedback throughout the research process.



David Chichkan/ An illustration symbolizing the exhaustion, risks, and invisible work of delivery service couriers.



## Abstract

This report examines how labour migrants and other vulnerable workers are engaged in sectors characterized by high informality in Ukraine, and how institutional, legal, and market actors shape their working conditions in a context of war, labour shortages, and European integration. The central research question asks how employment relations are structured in platform-based food delivery and retail trade of agricultural products, and to what extent existing regulatory and governance frameworks protect (or fail to protect) migrant and irregular workers.

Empirical evidence is based on 23 semi-structured interviews with trade unions, NGOs, lawyers, employer organizations, government authorities, international recruitment agencies, migrant and national workers, complemented by two multi-stakeholder focus groups. The study analyses two in-depth case studies: (i) the legal and social consequences of the 2019 death of a Glovo courier and the classification of platform workers as self-employed; and (ii) the situation of Belarusian migrants engaged in informal agricultural trade during the full-scale war.

The findings show a persistent regulatory gap in defining employment relationships in the gig economy, widespread use of pseudo self-employment and intermediaries, limited access to social protection, and heightened vulnerability of migrants and undocumented workers. State authorities largely refrain from active regulation, while courts tend to reinforce the self-employment model. Civil society and legal actors partially mitigate risks but lack systemic leverage. Overall, the report highlights structural drivers of informality and the urgent need for legal clarification and institutional coordination to ensure decent work and rights protection.





## Table of contents

<b>Executive summary</b>	<b>5</b>
<b>1. Introduction</b>	<b>7</b>
<b>2. Case 1: Food Delivery</b>	<b>10</b>
2.1. The Case in a Nutshell	10
2.2. Labor Migrants and National Workers Working Conditions	14
2.3. Stakeholders Strategies and Frameworks	23
2.4. Interaction Between Key Actors in the Deceased Courier's Case	32
Conclusions	38
<b>3. Case 2: Retail Trade of Agricultural Goods</b>	<b>41</b>
3.1. The Case in a Nutshell	41
3.2. Labor Migrants' Working Conditions	45
3.3. Actors' Strategies and Frameworks	47
3.4. Interaction Between Key Actors	53
Conclusions	56
<b>ANNEXES</b>	<b>57</b>





## Executive summary

This report presents Ukraine's national contribution to Work Package 5 (WP5) of the DignityFIRM project, examining working conditions of labour migrants and national workers in two highly informalised sectors: platform-based food delivery and retail trade of agricultural goods. The analysis is situated in the context of Ukraine's ongoing war, labour shortages, large-scale displacement, and the country's EU accession trajectory.

Drawing on 23 semi-structured interviews and two focus groups with workers, lawyers, trade union representatives, NGOs, state institutions and recruitment agencies, the report explores how legal status, regulatory gaps and actor strategies interact to produce precarious and often unsafe forms of work. Particular attention is paid to migrants with temporary or irregular status, as well as internally displaced Ukrainians and other vulnerable groups who increasingly rely on informal employment as a survival strategy.

The first case study analyses platform-based food delivery, focusing on the Glovo courier sector and the long-running legal dispute following the death of a courier in 2019. Despite clear indicators of economic dependency and managerial control, couriers are systematically classified as self-employed or informal workers, excluding them from labour law protections, social insurance and effective remedies in cases of injury or death. The case illustrates how the absence of clear legal definitions of employment enables platforms to externalise risks while limiting state oversight and accountability. Migrant workers are particularly affected, often relying on borrowed accounts, intermediaries or undeclared arrangements due to administrative and legal barriers.

The second case study examines labour migrants—primarily Belarusian nationals—working in agricultural retail markets during the full-scale war. It highlights how security-driven migration governance, restrictions on residence permits and access to formal employment have pushed many migrants into informal work. This sector is characterised by low wages, lack of contracts, unsafe working conditions and limited access to healthcare or social protection, compounded by migrants' fear of contact with authorities.

Across both cases, the report identifies a consistent pattern of weak state intervention, fragmented institutional responsibility and reliance on civil society and legal professionals to address individual grievances rather than systemic problems. Employers and platforms





benefit from legal ambiguity, while migrants and other vulnerable workers bear the economic and physical risks of informality.

The findings underscore the urgency of aligning Ukraine's labour and migration governance with EU standards, particularly in light of the Platform Work Directive and broader acquis on decent work and social protection. Without clarifying employment status, strengthening labour inspection and ensuring equal access to rights regardless of migration status, informal labour practices are likely to expand further during post-war reconstruction. The report concludes that addressing informality is not only a matter of worker protection but also a prerequisite for fair competition, fiscal sustainability and Ukraine's credible EU integration path.





## 1. Introduction

The study of labor migrants' working conditions in Ukraine as part of the DignityFIRM project's Work Package 5 (WP5) is especially relevant today, given the country's ongoing European integration efforts and the anticipated post-war reconstruction.

This research focuses on the actions and interactions of key labor actors and relevant areas. Its urgency is underscored by the country's growing need to attract foreign labor. Contributing factors include widespread labor shortages, mobilization of men into the Armed Forces of Ukraine, and the emigration of large numbers of Ukrainian citizens, primarily women and young people.

Sectors with high levels of informal employment, such as platform-based gig work and retail sales of agricultural products, are no exception, with informal work arrangements becoming more widespread in Ukraine. For many labor migrants, especially those with irregular status, and displaced Ukrainians trying to avoid mobilization or facing other wartime disruptions (such as losing jobs or homes in occupied territories), informal or self-employed work offers a way to earn quick income<sup>1</sup>.

As part of WP5, our team conducted 23 interviews: with trade union representatives (1), NGOs (2), legal professionals (2), employer organizations (2), government authorities (2), international employment agencies (3); and with both labor migrants and local workers in the food delivery sector (5) and the agricultural retail sector (6). These interviews shed light on the experiences of migrants from Eastern Europe, the South Caucasus, Central Asia, and Southeast Asia. See more details in Annex 1.

In addition, two focus groups were held: the first included NGO workers (2), legal professionals (1), and a courier (1); the second brought together representatives from human rights organizations (5) and a government agency (1).

Nonetheless, several important stakeholders declined to participate or did not respond. They include the GlovoApp, McDonald's Ukraine Ltd. (a foreign-invested enterprise), several regional administrations, city councils, and business associations. Most private employers did not wish to discuss migrant workers, often claiming they lacked relevant information about undeclared labor.

While Ukraine currently hosts only a modest number of international labor migrants (see section 3.2.1 "The salience of IM work in the national debate" of the National Report WP4), interviews with lawyers and attorneys played a key role in this research. Not only are they insightful but are also, in our opinion, more valuable than the ones with workers, both local ones and from other countries. These professionals had either been directly involved in legal cases and public protests and understand legal gaps and have proposals for realistic legal reforms<sup>2</sup>.

---

<sup>1</sup> UA-WP5-02\_NGO

<sup>2</sup> ibid





Another important input came from international employment agencies, the number of which operating in Ukraine stands at 2,000. Until recently, such agencies were believed to be mostly present in Europe. For example, temporary staffing agencies in Poland. It was assumed that this industry wasn't yet well developed in Ukraine. In fact, it was only known that the State Employment Service was responsible for the employment of foreigners, as none of the government representatives interviewed during WP4 mentioned such important non-state actors as recruitment agencies.

While some of these agencies are inactive or fraudulent, the core group, perhaps around ten of them, is currently operating at full capacity. Since the start of the full-scale war, it became clear that Ukraine must import foreign workers. Accordingly, they are now helping foreigners come to Ukraine for work, rather than helping Ukrainians find jobs abroad.

According to international agency representatives, Ukraine is cautiously testing small-scale recruitment of foreign workers so that businesses can “calculate their labor costs for the employers.” Early estimates suggest that hiring foreign labor legally could cost employers twice as much as hiring locals, since foreign workers must be provided with housing, food, and transportation at a minimum<sup>3</sup>:

*“At the moment, very few foreigners are coming because it’s still too expensive for businesses. When a company wants to bring in a group of workers from Pakistan or India, they have to cover everything. If someone works for a year, the cost per hour is around 400–500 UAH [approx. €10]. That includes all expenses – paperwork, travel, accommodation – amortized over 12 months. But if someone only works six months, that cost doubles. So the government shouldn’t be trying to profit from this. The situation is critical. If the cost and bureaucracy were reduced by at least 90%, we’d see a boom in foreign labor recruitment.”<sup>4</sup>*

Recruiters believe Ukraine will primarily attract workers from Muslim-majority countries, which will require businesses to adapt – especially in terms of work schedules and integration into teams. Some large companies, including one in the farm-to-fork sector, have already approached agencies with requests to hire up to 200 workers from Bangladesh and various African nations. There are local enterprises that are clearly signaling a demand for foreign labor. They include those operating in safer regions as well as companies that relocated there from the war zones.

Local authorities are also starting to support such new employment programs. However, efforts remain stalled at the national level, particularly by the State Migration Service, which tends to view foreign migrants primarily through a national security lens<sup>5</sup>.

Meanwhile, state agencies like the State Employment Center have not yet developed clear guidelines, recruitment plans, or specialized programs to attract foreign workers. International recruitment agencies are thus working with private visa services, employment consultants, travel agencies, and lawyers – completely outside the purview of government

<sup>3</sup> UA-WP5-09\_non-state actors

<sup>4</sup> ibid

<sup>5</sup> ZAXID.NET. (2024, April 26). *Bangladeshi workers denied visas for employment in Zakarpattia.*

[https://zaxid.net/robitnikam-z\\_banqladeshu\\_vidmovili\\_u\\_vizi\\_dlya\\_pratsevlashtuvannya\\_na\\_zakarpatti\\_n1603382](https://zaxid.net/robitnikam-z_banqladeshu_vidmovili_u_vizi_dlya_pratsevlashtuvannya_na_zakarpatti_n1603382)





institutions. This dynamic underscores the proactive role of the private sector and civil society in driving change.

Oftentimes the need for foreign labor is often overestimated by Ukrainian experts. Especially since the foreign workers already present in Ukraine are not being engaged effectively and the willingness of state authorities to protect the rights of migrants under temporary protection and to refrain from creating barriers to the formalization of employment relationships. Although the number of migrant workers significantly declined after the start of the war in February 2022, neighboring Belarus was one of the key countries from which people sought political asylum and protection in Ukraine.

After 2020, when the regime in Belarus tightened its grip, many Belarusians – including activists and entrepreneurs – sought temporary protection in Ukraine. In 2022, Ukraine’s government dramatically changed its attitude toward them as Minsk openly supported Russia’s war. As a result, many Belarusians in Ukraine fell victim to political circumstances. As a result of restrictions on legal employment – including blocked bank accounts and the refusal to extend residence permits – many of them took informal or undeclared jobs.

Accordingly, WP5 scrutinizes two case studies. Each illustrates different approaches to foreign labor engagement in Ukraine, including legal status and access to social protection between 2019 and 2023:

1. The 2019 death of a Glovo food delivery courier, which sparked protests by platform workers and a legal battle over whether an employment relationship existed between the courier and the company.
2. Status of Belarusian migrant workers during the full-scale war, highlighting the government’s attempts to balance national security concerns with the protection of migrant rights – particularly in the context of informal work in agricultural markets.





## 2. Case 1: Food Delivery

### 2.1. The Case in a Nutshell

#### *a) Market and market players*

Ukraine's food delivery market is dominated by aggregator platforms, primarily Glovo (multi-category delivery) and Bolt Food (restaurant delivery). Following the bankruptcy of Rocket in 2022, these two platforms remain the main active players, although no official market statistics exist. Media estimates indicate that Glovo demonstrated approximately 23% business growth in 2024 and, by the end of 2024, accounted for about 12,987 jobs and roughly 80% of market share. Retail and chain operators with their own delivery models – such as Zakaz.ua, Nova Poshta, Silpo, Fozzyshop, Fora and Tarantino Family – more often rely on direct employment or civil contracts, providing more predictable working conditions. Local aggregators (e.g., Mister.Am) and “virtual restaurants” occupy intermediate niches. Across aggregator platforms, however, employment relations are typically structured through public offers, self-employment or FOP registration, algorithmic management and unilateral rule changes, with widespread intermediation and account sharing. The findings on non-employment, unilateral terms and informality therefore apply to both Glovo and Bolt Food and reflect broader platform-delivery practices rather than a single company's model. See more details in Annex 2.

#### *b) Workforce composition*

There is no official statistical data on the composition of the courier workforce in Ukraine's platform-based food delivery sector. Available estimates are based on triangulated interview evidence and expert assessments.

Before the full-scale war, foreign nationals were estimated to account for approximately 20% of couriers working on delivery platforms. Since 2022, their share has declined to around 5%, and many of those remaining are believed to lack valid residence or work permits. The main regions of origin of foreign couriers include Eastern Europe, the South Caucasus, Central Asia and Southeast Asia (e.g. Azerbaijan, Uzbekistan, Kazakhstan, Tajikistan, Vietnam), with Belarusian migrants constituting a distinct subgroup discussed separately in this report.

Among foreign workers, several administrative categories can be distinguished, including temporary residents, individuals with expired or lapsed permits, asylum seekers (including those with negative decisions), former holders of student permits, former beneficiaries of family reunification, and fully irregular migrants. These categories directly shape workers' ability to pass platform onboarding procedures and largely determine whether they must rely on borrowed accounts, intermediary arrangements or third-party FOP credentials in order to access work.

At the same time, irregular work in the platform delivery sector is not limited to foreign nationals. Ukrainian citizens also frequently work without formal contracts and through borrowed accounts or intermediary arrangements linked to registered sole proprietors





(FOPs). Although no reliable quantitative estimates exist, consistent testimonies indicate the presence of a large mixed group of irregular couriers, comprising both migrants and nationals, sustained by non-FOP work, account-lending practices and intermediary channels.

Since 2022, internally displaced persons (IDPs) and some men avoiding mobilization have increasingly turned to platform delivery as a source of fast and flexible income. This trend has further expanded the pool of workers engaged in informal or semi-formal arrangements within the sector.

### *c) Case under study*

This first case of the report combines a specific event-based analysis (the premature death of a courier in Kharkiv in July 2019) with a broader assessment of general working conditions of Ukrainian and foreign couriers on the Glovo platform in Kyiv (2019–2025). While the findings are context-specific, they illustrate nationally relevant systemic patterns, including a high prevalence of informality, weak recognition of employment relationships on platforms, and administrative barriers that divert migrants into irregular work.

The Spanish food delivery service Glovo entered the Ukrainian market in October 2018, its 21st market. Initially launched in Kyiv, the platform gradually expanded to other Ukrainian cities. Before the war, Glovo had around 10,000 couriers working in 39 cities<sup>6</sup> across the country; current figures are not publicly available. As of now, Ukraine is Glovo's third most profitable market after Spain and Italy<sup>7</sup>. According to media, as of the end of 2024, the company had 12,987 jobs and occupied 80% of the market share<sup>8</sup>. More information about general market share see in Annex 2.

Ukrainian student Mikhail Ivanov used to work for Glovo. He died in a traffic accident while delivering goods on a bicycle in Kharkiv in July 2019, just ten months after Glovo began operating in Ukraine. This accident sparked a wave of courier protests and triggered a lawsuit against GlovoApp Ukraine LLC, which has been ongoing for over five years.

The crux of the problem is that there's no formal contract between couriers and digital platforms – not just at Glovo but at other similar services too. Typically, the couriers act as self-employed contractors and enjoy no social protections.

The deceased's family and their legal representatives argue that the company should be recognized as Mikhail's employer. If they win the case, this could set a precedent affecting all couriers who, prior to the war, largely included both Ukrainian and international students.

<sup>6</sup> Forbes Ukraine. (2022, April 11). *Glovo: From 10,000 couriers to 3,700 – the company changed its CEO and is rebuilding operations. What is its survival strategy?*

<https://forbes.ua/innovations/u-glovo-z-10-000-kureriv-zalishilos-3700-kompaniya-zminila-kerivnika-i-perebudovue-robotu-yaka-u-nei-strategiya-vizhivannya-11042022-5370>

<sup>7</sup> Forbes Ukraine. (2025, June 25). *Glovo as a marketplace: How Ukraine's largest food and grocery delivery service is evolving. Interview with Glovo co-founder Sacha Michaud and Ukrainian office CEO Maryna Pavliuk*

<https://forbes.ua/company/glovo-tse-marketpleys-yak-zminyetsya-naybilshiy-v-ukraini-servis-dostavki-izhi-ta-produkti-v-intervyu-zi-spivzasnovnikom-glovo-sasheyu-misho-i-ceo-ukrainskogo-ofisu-marinoyu-pavlyuk-25062025-30810>

<sup>8</sup> Horeca Ukraine. (2025, September 19). *Results of 2024 for the largest delivery services in Ukraine - Bolt Food and Glovo*  
<https://horeca-ukraine.com/pidsumki-2024-roku-najbilshih-servisiv-dostavki-v-ukraini-bolt-food-ta-glovo/>





Mikhail died on July 30, 2019 and his family received no compensation as the first court ruled that he had not been formally employed by Glovo. **The ruling provoked widespread protests among platform workers, who demanded proper social protection.**

Glovo couriers **first took to the Kyiv streets** on July 22, 2019 just several days before Mikhail's death due to sudden changes to the delivery system and the company's compensation structure. Protesters demanded the cancellation of the new bonus scheme – which forced couriers to work overtime without stable income – the reinstatement of transparent rates, official employment, social protections, and improved working conditions, including safeguards against exploitation<sup>9</sup>.

One activist at the protest emphasized that transnational corporations avoid responsibility for their workers, entering markets not to develop them but to seize them. Once they succeed, they lower wages and working standards. Their financial advantage allows them to operate at a loss to eliminate competitors and thus dictate terms. He called for the workers' rights to be respected<sup>10</sup>.

A **second protest** took place in Kyiv on July 26, 2019 following Glovo's decision to dismiss many couriers who had participated in the first protest. Protesters again demanded the removal of the new bonus system, which forced them to work 15-hour days for minimal pay. They insisted on reinstating fair and transparent compensation, including weekly payments in accordance with completed deliveries. They also demanded accident insurance, an end to account suspensions for participating in group chats or protests, reinstatement of blocked accounts, and legal clarity in their employment status: either as official employees or legally defined contractors, not freelancers<sup>11</sup>.

The protests continued for at least a month after Mikhail's death, focusing on the improvement of working conditions and securing basic labor protections for couriers<sup>12</sup>.

**The protests by Glovo couriers marked a significant turning point in the labor rights movement for platform workers in Ukraine.**

While the protests raised awareness about the challenges of the gig economy and the need for fairer models of cooperation, they did not result in substantial changes, the study shows. In fall 2019, instead of formal employment contracts, the company introduced the most basic insurance for couriers. Though the move intended to ease tensions<sup>13</sup>, it sparked additional strikes<sup>14</sup>.

<sup>9</sup> Trudovi.org.ua. (2021, July 10). *First-ever Glovo courier protest took place in Ukraine*. <https://trudovi.org.ua/news/vidbuvsia-pershyy-v-ukraini-protest-kur-ieriv-glovo/>

<sup>10</sup> Social Movement. (2024, April 17). *Glovo protest goes global and looks for new forms*. <https://rev.org.ua/glovo-protest-globalizuyetsya-i-shukaye-novix-form/>

<sup>11</sup> Politychna Krytyka. (2024, March 11). *"We are invisible": How Glovo couriers live and work in Ukraine | Documentary*. YouTube. [https://www.youtube.com/watch?v=qCIQ\\_ZAdwMk](https://www.youtube.com/watch?v=qCIQ_ZAdwMk)

<sup>12</sup> Nash Kyiv. (2024, March 5). *Why Glovo couriers are protesting in Kyiv*. <https://nashkiev.ua/life/chomou-v-kievi-protestouyut-kour-eri-glovo>

<sup>13</sup> Hmarochos. (2019, September 5). *Glovo started insuring the life and health of its couriers*. <https://hmarochos.kiev.ua/2019/09/05/glovo-pochala-strahuvaty-zhyttya-i-zdorov-ya-svoyih-kur-yeriv/>

<sup>14</sup> Politychna Krytyka. (2019, September 10). *Glovo couriers received insurance but not official employment*. <https://politykrytyka.org/2019/09/10/kur-yery-glovo-otrymaly-strahuvannya-ale-ne-ofitsijne-pratsevlashuvannya/>





In 2021, Bolt Food couriers staged a “digital strike” after a pay cut. Glovo couriers also protested again that year following further reductions in compensation, including the cancellation of travel reimbursement and bonus changes.

A labor law expert commented on the matter: *“These workers have no employment guarantees or compensation if there’s a workplace accident. The government also loses out on tax revenue. Legalizing courier work is essential to ensuring decent labor conditions. Recognizing formal employment under labor law is the only way to guarantee proper protections.”*<sup>15</sup>

With the start of Russia’s full-scale invasion of Ukraine, physical protests stopped due to martial law that restricts public gatherings in line with the Constitution of Ukraine<sup>16</sup>. Instead, the protests started taking place online, including on social media.

As part of WP5, we examined interactions between key actors in the lawsuit over Mikhail’s death, the changes (or lack thereof) this case triggered for all platform workers, including migrants, the gap between official and actual working conditions for couriers, and the potential impact of global shifts toward recognizing food delivery couriers as employees in Ukraine just like Spain, Mexico, Singapore, and South Korea.

While foreign nationals are not the primary focus of this case, they could benefit from it too. Should the court side with the plaintiff, it could open the door for foreign couriers to demand better protections and guarantees.

On March 25, 2025, the court ruled fully in favor of GlovoApp Ukraine, dismissing the case. The plaintiff’s lawyer has since filed an appeal, which remains under review.

As of June 2025, the lengthy legal process led to a minor improvement only as in September 2019, GlovoApp Ukraine was forced to introduce basic health insurance coverage.

*“After the accident, GlovoApp Ukraine did two things: first, they paid off a tax debt to the city of Kyiv – which I remember happening against the backdrop of those events – and second, they introduced what I believe is a fake insurance scheme, which is still in place.”*<sup>17</sup>

The courier’s family and their lawyers hope that a favorable court decision could ultimately influence the adoption of a long-awaited law on employment specifics for gig workers. The Ukrainian parliament has been considering this bill since 2021 (see Section 4.1 of the National WP4 report on general policy developments regarding IM work).

Some WP5 interviews also revealed that the legalization of platform labor needs must be done with caution. Sudden changes could harm those who view it as the only source of income, especially IM, internally displaced persons (IDPs), women, and men dodging conscription who rely on courier work to support their families<sup>18</sup>:

<sup>15</sup> UA-WP5-02\_NGO

<sup>16</sup> Verkhovna Rada of Ukraine. (1996). *Constitution of Ukraine* (№ 254к/96-ВР). <https://zakon.rada.gov.ua/laws/show/254%D0%BA/96-%D0%B2%D1%80#Text>

<sup>17</sup> Expert focus group 1. National worker (2025)

<sup>18</sup> UA-WP5-04\_lawyer/expert





*“If we rush into this idea of ‘Let’s protect everyone, because we believe these to be fully employed people, just like Spain did,’ we risk harming the very people we aim to help. I walk the streets and see these workers – not just students, but people my age or older, many of them women. I know how tough this job is and that it’s no fun, especially in winter. If we act too drastically, we’ll be hurting them first. The companies will adapt – they’ll find a way by changing schemes or else. But I worry about the people. For many of them, this is the only way to earn a living.”<sup>19</sup>*

Accordingly, this case is both unique and may reshape the legal framework governing platform courier labor in Ukraine, for better or worse.

## 2.2. Labor Migrants and National Workers Working Conditions

- **Legal Status**

Couriers typically do not have employment contracts; they accept a public offer / terms of cooperation in the app. Platforms treat them as independent contractors (often FOPs), leaving them outside labour-law protections. In practice, work control and dependency resemble employment, raising concerns of bogus self-employment (functional employees without protections). Payments are routed from Spanish bank accounts, which respondents flag as non-compliant with Ukrainian tax rules – another sign of regulatory opacity rather than an “unregulated void.” Overall, arrangements are not lawless, but largely operate through civil and contractual instruments that circumvent labour law, producing a bogus self-employment reality for many couriers.

Ukraine’s food delivery sector employs both national and foreign workers, foremost individuals with temporary residence permits or no legal status at all. Both Ukrainian and migrant couriers operate as “independent contractors” or “freelancers,” not as formal employees. Glovo does not sign labor contracts with its couriers; instead, it engages with them as self-employed service providers or (in many cases) through pseudo-contractual arrangements. These arrangements often involve signing informal agreements via the platform interface or working under a registered sole proprietorship (known in Ukraine as a Fyzyczna Osoba-Pidpryiemets, or FOP).

The Glovo courier who died in the traffic accident was a university student who took a summer job. Before the war, the majority of Ukrainian couriers were young students who needed a gig. He worked on the platform but was not registered as a FOP.

According to the respondents, foreign workers once made up about 20% of the workforce pre-war. Their percentage has now dwindled to around 5%, and they likely lack both legal residence and work permits<sup>20</sup>.

Ukraine’s employment policies toward foreigners have long focused on attracting only highly skilled, well-paid professionals. As a result, employers either hired migrant couriers for their

---

<sup>19</sup> ibid

<sup>20</sup> UA-WP5-02\_NGO





unique experience or exploited their legal vulnerability. Most migrant couriers working for Glovo in Ukraine do so via grey area arrangements that violate both labor and immigration laws. These workers are extremely vulnerable, often lacking labor rights and legal recognition.

Irregular migrant workers join the platform economy for various reasons. Some failed to renew their permits before expiry and lost legal status (especially ex-international students at Ukrainian universities); others lost their jobs and no longer meet criteria for legal stay; some asylum seekers received negative decisions; and others lost their residency status after family breakdowns (e.g., divorce that terminated family reunification grounds).

This group is particularly at risk of exploitation due to the total absence of legal protections. Still, they often choose platform work because it is one of the few quick income options available in a big city. Without legal status, these migrants cannot sign up on delivery platforms under their own names. Instead, they rely on various strategies – using the identity or FOP credentials of a legally residing migrant, or partnering with a national worker willing to share access.

- **Unprotected employment**

In the food delivery sector, especially in this case study, employment is marked by the absence of formal labor contracts and the informal self-employment status of couriers.

Key characteristics of contractual relationships:

- Legal status: Couriers typically operate either as private individuals or as FOPs.
- Regulation: These couriers are not entitled to protections under labour law but must pay taxes themselves if registered as FOPs.
- Operational model: Glovo posts a public offer agreement that couriers accept upon registration.

Both foreign and Ukrainian food delivery couriers are not recognized as employees, even though their working relationships match the definition of employment.

There are no employment contracts between couriers and the company. Instead, couriers agree to the General Terms and Conditions of Use and Cooperation with Glovo that they sign electronically during registration. This agreement provides access to the Glovo website and app<sup>21</sup>. Registration requires only a username, email address, phone number, and bank card number. Payments are made from Spanish bank accounts in violation of Ukrainian tax law. According to respondents, local government officials oversee Glovo's operations [this information is unofficial and the interview request was denied]<sup>22</sup>

---

<sup>21</sup> Glovo. (n.d.). *Glovo terms and conditions*. <https://glovoapp.com/docs/uk/legal/terms/> (Accessed December 12, 2024).

<sup>22</sup> UA-WP5-02\_NGO





Mikhail family's attorney stated that while Glovo formally classifies its couriers as independent contractors, in reality it controls their work, raising questions about the legality of this arrangement as it also strips workers of labour rights and social protections:

*“The Terms place full responsibility on the courier. It says the courier decides how and when to work. That suggests entrepreneurial freedom. But if we look at real-life conditions, questions arise. Can a courier deliver products not associated with Glovo partners? Can they work for other companies or on their own schedule? Are they really as independent as Glovo claims?”<sup>23</sup>*

After the 2019–2021 legal proceedings, the company allegedly began requiring all couriers to be officially registered as FOPs. These FOP couriers were reportedly given advantages, such as priority in selecting work slots and faster payments. However, focus group participants argued that the FOP status offers no real benefits:

*“In practice, there's no difference between a FOP and a non-FOP. FOP status doesn't improve your working conditions – it just adds extra burdens, like tax filing obligations. Personally, I think the FOP model is harmful. These workers are functionally employees. There's no difference between them and someone working under a regular labor contract. But the companies keep insisting they're not employees. That's not true. And they get away with it because there's no clear legal definition of an employment relationship.*

*If we had such a definition in our law, the issue could be resolved. Just look at Spain, Glovo's home country – they've had several court rulings recognising couriers as employees.”<sup>24</sup>*

Furthermore, Glovo does not verify whether the person using a FOP account is actually the real FOP.

Meanwhile, in 2025, the company started sending messages via its chatbot that hint at potential legal changes:

*“Dear Couriers, in light of Ukraine's European integration efforts and the anticipated changes in legislation regulating online platform work, we're preparing for these changes in advance and want to make sure they don't catch you by surprise.”*

The company is offering bonuses to couriers who register as FOPs in the near future. Judging by the comments in the chatbot, many couriers are reluctant to give up 6% of their income in taxes and fees. As an incentive, Glovo also suggests covering the taxes on behalf of couriers until the end of 2025. Still, as participants in focus groups pointed out, even working under a legitimate FOP registration provides no real protection under labour law:

*“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.”*

*The Glovo-provided insurance doesn't cover vehicle damage during work-related accidents, doesn't compensate for lost income, and barely covers medical expenses. The insurance company decides the payout amount based on its own internal charts, and the resulting sum*

---

<sup>23</sup> UA-WP5-03\_lawyer

<sup>24</sup> Expert focus group 1. National worker (2025)





*is often symbolic at best. Even the payments themselves are inconsistent. I've heard of cases where money arrived within nine days after an accident, but in other cases, it took around 40 days. And these payments didn't even come as official insurance compensation – they were sent as personal P2P transfers from an individual.*

*Honestly, the whole insurance scheme looks more like PR. When gig companies first entered the Ukrainian market, there was no insurance at all. As one of the organizers of the first courier protests, I remember clearly that we demanded accident insurance from the very beginning.”*

*The conditions are equally questionable when it comes to parental support. According to Glovo's policy, a courier who becomes a parent must complete at least 700 deliveries in the three months prior to the child's birth in order to receive a payment of 10,000 UAH (about €200, author's note).<sup>25</sup>*

*“It's a really dangerous path we're heading down if everyone becomes a registered FOP. That would effectively legitimize a system wherein these workers are not recognized as employees.”<sup>26</sup>*

Accordingly, many couriers still choose to work without registering as FOPs, despite the company's growing threats that accounts without verified FOP status will soon be blocked.

*“This isn't the first time – it's happened before. And the rhetoric is always the same: ‘We'll block all accounts of couriers who haven't registered as FOPs.’ But they've been making these threats for years, and nothing has come of it. The companies know full well that if they really did block all non-FOP couriers, there would simply be no one left to make deliveries. They can only enforce this when there's a surplus of couriers. For example, if there are too many active workers, they might selectively block the ones with the lowest activity – just to make an example: ‘Look, they didn't register as a FOP, so we blocked them.’”<sup>27</sup>*

Between 2019–2025, none of the major food delivery services – including Glovo – officially employ their couriers (with the exception of supermarkets who deliver the groceries directly). Courier accounts are routinely rented out or sold, and companies offer no social protections or employment guarantees. Couriers often work 80–90 hours per week, covering all their own expenses, including fuel and mobile data while arbitrary account suspensions remain widespread:

*“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.*

---

<sup>25</sup> ibid

<sup>26</sup> ibid

<sup>27</sup> ibid





*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.”<sup>28</sup>*

Thus, delivery couriers in Ukraine, particularly those working for Glovo, are effectively employees but are nonetheless legally classified as self-employed individuals or work without any official status at all. The lack of formal employment contracts strips them of fundamental rights and protections, including social guarantees and compensation in the event of injury or loss of ability to work. Despite alleged independence, platforms exercise substantial control over their work – directly contradicting the idea of genuine self-employment. In a regulatory environment lacking clear legal definitions of employment relationships, this model remains opaque, exploitative, and dangerous for workers.

- **Inadequate Income**

In Kyiv, several factors point to the inadequacy of courier income:

- Income instability – Couriers’ earnings depend entirely on the number of deliveries completed, which varies significantly season-to-season, competition, demand, weather conditions, and changes in platform algorithms.
- No guaranteed minimum pay – Since couriers are classified as self-employed, the company does not offer a fixed or guaranteed minimum wage.

Pay is calculated upon completion: Couriers are paid only for deliveries they actually complete. The more deliveries they make in a day or week, the higher their income. However, the absence of guaranteed minimum workload means that on “slow” days (due to low demand, bad weather, or other factors), a courier might earn significantly less – or nothing at all. A sufficient income is possible only with full-capacity workweeks (80–90 hours per week).

- Out-of-pocket expenses – Couriers cover all their own expenses, including fuel, vehicle maintenance, repairs, mobile data, and even insurance. If they don’t have their own transport, they often rent it at their own cost.
- Reduction of pay rates and bonuses – Companies regularly reduce base pay per delivery or modify bonus schemes in ways that decrease overall income.

Bonuses and extra payments are typically tied to meeting high-performance targets, such as completing a certain number of orders within a limited timeframe. But these bonuses are unstable, and the rules for receiving them change frequently. Moreover, the platform controls many of the conditions – including tariffs, access to “hot zones,” and penalties for internal rule violations – leaving couriers with little to no influence over their earning potential.

---

<sup>28</sup> UA-WP5-05\_national worker



- Lack of social benefits and protections – Couriers receive no paid vacation, sick leave, insurance, or any of the standard benefits afforded to employees.

In case of illness, vehicle breakdown, or even unjustified account suspension, couriers have no access to compensation and cannot appeal the loss of income through labor courts, as they are not officially recognized as employees. Their income is unstable, unpredictable, and unsupported by labor rights.

- Psychological and physical strain – High workloads paired with low and insecure income have a negative impact on couriers' mental and physical health, as well as their motivation.

These factors collectively create the same precarious conditions for both national and migrant workers: income levels do not match the costs and demands of the job, leading to financial insecurity and a lack of protection for couriers.

- **Lack of Rights and Protections**

The lack of rights and protections for food delivery couriers is evident given that there's no trade union and limited access to health insurance.

According to labor law experts, platform workers do not wish to join trade unions because they compete directly with one another and see little value in formalizing their relationships. Instead, they rely on informal online mobilization tactics to defend their rights. Unfortunately, these tactics are largely ineffective, especially when it comes to legal proceedings<sup>29</sup>:

*“Since couriers are not officially employed and cannot join unions, they’ve adopted other strategies to protect their rights. These include informal ‘pressure groups’ (like Telegram channels), where they coordinate collective actions, essentially functioning as informal unions. It’s difficult to formally organize this sector. Workers are scattered and each so-called freelancer is effectively a competitor.”<sup>30</sup>*

Ukrainian Glovo couriers attempted to establish a trade union following a traffic accident, albeit in vain.

Meanwhile, foreign workers cannot form unions on their own; they are only allowed to join existing ones. The respondents noted that throughout their entire careers, they had not encountered any cases of migrant workers turning to unions for help. They also emphasized that protecting migrant workers is significantly more difficult and requires additional efforts to improve their working conditions. Interviews with union representatives revealed that migrant workers often distrust unions and doubt that any organization would be capable of protecting them. In many cases, they find it easier to bribe regulatory authorities than to seek institutional support. The respondents stressed the urgent need for awareness campaigns that would inform migrants about the importance and benefits of turning to trade unions for protection.<sup>31</sup>

---

<sup>29</sup> UA-WP5-02\_NGO

<sup>30</sup> Ibid.

<sup>31</sup> UA-WP5-01\_trade union





Overall, food delivery couriers in Ukraine operate in a legal vacuum, which leaves them vulnerable to labor exploitation. The vast majority of couriers are not officially employed, meaning labor law protections do not apply to them. This effectively strips them of access to fundamental rights such as paid leave, sick days, or accident insurance.

Moreover, platforms often make unexplained decisions to deactivate accounts and change working conditions and make it impossible to appeal, reinforcing the one-sided control over workers. The algorithms that govern order distribution and payment remain opaque. Effective collective protection mechanisms are practically nonexistent; attempts to self-organize are limited or not recognized by companies.

Accordingly, in this employment model, couriers bear all the risks and costs without receiving either a stable income or protection of labor rights.

Experts believe that the only way to improve this situation is to make changes to Ukraine's Labor Code and clearly define "employment" and outline the necessary criteria:

*"Occupational health and safety bill is currently prepared for second reading in the Verkhovna Rada<sup>32</sup>. It's intended to replace the current law on labor protection. While there are many concerns, the key issue is that, unless we legally recognize platform workers as employees, there will be no obligation for platforms to provide insurance.*

*Still, these same platforms continue to repeat the same mistakes, stating, for example, that insurance only applies during order fulfillment. This could indicate an employment relationship, especially since working hours are monitored."<sup>33</sup>*

The problem with life and health insurance for Glovo couriers in Kyiv is that, while the company formally claims to provide coverage, in practice these insurance mechanisms are ineffective and offer little real protection. On paper, Glovo claims to provide insurance coverage to its couriers through the UNIQA (YHIKA)<sup>34</sup> insurance company. It is applicable to accidents at work, with benefits if the courier is hospitalized, receives fractures, or dies. In reality, however, the system has serious limitations and is being recurrently complained about.

One of the main barriers is the overly complex and bureaucratic procedure for receiving compensation. For the insurance company to even consider a claim, the courier must report the incident within 30 minutes, comply with all formal requirements, and gather medical records and police documentation. In many cases – especially after traffic accidents or serious injuries – these requirements are nearly impossible to fulfill.

Even when all documents are submitted, couriers report that compensation amounts are symbolic and fail to cover the actual costs incurred.

*"What I learned from those who were eligible for insurance is that the insured amounts are very low – almost symbolic. If I understood correctly, the maximum payout is around 50,000*

<sup>32</sup> Verkhovna Rada of Ukraine. (n.d.). *Draft Law No. 10147 on amendments to the Law on employment regarding the regulation of platform work*. <https://itd.rada.gov.ua/billInfo/Bills/CardByRn?reqNum=10147&conv=9>

<sup>33</sup> Expert focus group 1. NGO (2025)

<sup>34</sup> UNIQA. (n.d.). *Glovo insured its couriers in the UNIQA company*. <https://uniqa.ua/blog/glovo-zastrakhuvala-svoikh-kureriv-v-kompanii-uniqa/>





UAH [approximately €1,000 – author’s note]. But in the traffic accidents that I examined, people received only between 500 and 3,000 UAH [approximately €10–60 – author’s note], even though their medical expenses were significantly higher.”<sup>35</sup>

Couriers also do not receive paid sick leave, unemployment insurance, or pension contributions. Accordingly, insurance appears to be a partial substitute for basic social protections – but does not provide effective mechanisms for real support.

Then there’s the critical communication issue. If there’s an accident, the couriers can only contact the company via email; there is no hotline or emergency support. Accordingly, the response time in critical situations is delayed, slowing down claims or making it impossible altogether.

Given that Glovo couriers in Kyiv work under constant risk, the issue of insurance is systemic. The current model does not reflect the level of danger workers face daily. Formally available insurance does not make up for the lack of real protection, and the gig economy model allows the company to avoid responsibilities – both to workers and to the state – by not paying taxes.

- **Working and Living Conditions**

### **Working Conditions**

Compared to migrant workers, Ukrainian nationals generally have more options when it comes to platform work. They can choose between self-employment (as private individuals carrying out professional activity or FOPs) or informal work arrangements. They are more familiar with the platforms, face fewer barriers during registration, and have better access to banking and digital services – largely due to language fluency. However, most still work without formal labor contracts, under algorithmic management, and without any social protections or guarantees. Their working conditions are unstable, and competition is high.

Foreign workers – particularly those from Central Asia or Africa – are even more vulnerable. Many lack legal status or are in Ukraine on temporary residence permits (for example, after completing studies). The absence of citizenship makes it more difficult (though not impossible) to register as a FOP, open bank accounts, or connect to platforms. Some work using accounts registered to other individuals, giving up a portion of their earnings. These conditions increase their dependence on intermediaries and “overseers,” generate extra costs, and leave migrants in a state of legal and economic insecurity.

A high level of personal risk and instability associated with working conditions applies to both migrant and national workers:

- Traffic accidents are among the most common and serious risks.

Couriers are on the move daily, often using bicycles or mopeds, operating in difficult weather conditions, on slippery roads, during rush hours, and frequently without proper protective gear. Due to the lack of adequate insurance and formal employment, they have no guarantee of compensation in the event of injury or vehicle damage.

---

<sup>35</sup> Expert focus group. National worker (2025)



- An unpredictable and unregulated work schedule is another major issue.

Couriers are forced to constantly monitor the app for incoming orders, as the reward system encourages maximum availability. In reality, there is no clear boundary between work and rest, making it difficult to plan one's time. This leads to emotional burnout and reduced concentration while on the road.

- Excessive physical strain is a defining feature of the job, with couriers often working 8 to 13 hours a day, covering dozens of kilometers daily.

Over time, this affects the musculoskeletal and cardiovascular systems and contributes to overall physical exhaustion. Due to the lack of social protections couriers are left to deal with consequences on their own. Meanwhile, undocumented migrants (IM) also have limited access to healthcare.

*"After Andrii's death, it seems the platform introduced a technical limit so that no more than 12 slots could be scheduled in one day. Before that, it was unlimited."<sup>36</sup>*

All of these factors – high risk of traffic accidents, complete unpredictability of work hours, and significant physical exhaustion – indicate that the working conditions of delivery couriers in Ukraine are far from safe or dignified.

*"Decent work is simply not a concept that companies like Glovo recognize. Insurance is just one part of what decent work entails. But it also includes freedom from discrimination, freedom from workplace harassment, the right to rest, the right to reasonable limits on working hours, and the right to occupational safety. All these rights, taken together with insurance, constitute the right to decent work."<sup>37</sup>*

### Living Conditions

National couriers generally live in their own households or rent housing individually. In most cases, they have access to public healthcare and social services, and they are better informed about their rights. While housing costs affect their income, the impact is typically less severe than for migrant workers.

Migrant workers, by contrast, are often forced to live in overcrowded rooms, dormitories, or shared apartments. Their accommodations tend to be temporary, inexpensive, and frequently rented unofficially. They lack access to public healthcare and often avoid contact with the police or official institutions as they fear deportation or job loss. Exploitation by landlords, employers, and intermediary "handlers" from within their own migrant communities is widespread.

*"We tried to engage with some of the migrants, but it was almost impossible because they were very, let's say, closed off in their own clusters. Even if you look at food delivery from certain restaurants – take McDonald's in Shuliavka [a district in Kyiv, author's note – it was one specific cluster. I live in Kurenivka [another district in Kyiv, author's note], and there were guys*

---

<sup>36</sup> UA-WP5-05\_national worker

<sup>37</sup> Expert focus group 1. Expert lawyer (2025)





*from Central Asia around, and they were very clustered, and they had these so-called 'watchers' you had to go through to talk to anyone. As our Ukrainian courier colleagues said: 'It's better not to approach them.'"<sup>38</sup>*

Thus, the living conditions of national couriers tend to be more stable and secure than those of migrant workers, who face social isolation and are vulnerable to exploitation due to their lack of legal status and fear of state institutions.

### 2.3. Stakeholders Strategies and Frameworks

- **Employers:** Using the flexibility of self-employment models to avoid responsibility and reduce tax burdens.

#### Recruitment Strategies

*The key recruitment model:* Food delivery platforms in Ukraine are part of the gig economy model, in which the courier is not considered a legal employee. They seek to recruit broad social groups – students, freelancers, internally displaced persons (IDPs), temporarily unemployed individuals, and men seeking to avoid military conscription. The core message emphasizes a quick start, flexible hours, and "high" earnings.

*Recruitment Channels:* Platforms either outsource recruitment to third parties or advertise them on social media, job search websites, and billboards. These ads often highlight the highest possible earnings, even if these are exceptional cases. This allows platforms to promote exceptionally high income levels without technically violating advertising standards.

*Onboarding Process:* It is easy to get started: you need to register online, use a smartphone, and have a vehicle. There are no interviews or background checks, which enables platforms to recruit at scale during peak periods.

*"Before joining today, I decided to check out Glovo's website and some affiliated resources. And after reading through them, I thought, 'Why are we even meeting today? Everything looks perfect!' They describe things in such glowing terms, as if there are no problems whatsoever."<sup>39</sup>*

#### Collaboration Strategies

*Contract Format:* Most couriers do not have formal employment contracts. You can simply join the platform, work as FOP, or intermediary. Platforms do not guarantee social rights such as paid leave, sick days, or pensions. Terms of cooperation can be changed unilaterally without consultation with couriers.

*Income Instability:* Earnings fluctuate depending on weather conditions, order volume, and platform-set multipliers, which can be adjusted at any time without notice. During bad

<sup>38</sup> UA-WP5-02\_NGO

<sup>39</sup> Expert focus group 1. Expert lawyer (2025)





weather (rain, snow), couriers receive no additional compensation, which lowers their motivation to work.

*Demand and Supply Management:* At peak times, instead of increasing courier rates, platforms often deactivate restaurants from the app to reduce load. At the same time, they encourage restaurants to pay higher commissions to avoid being delisted. This creates artificial competition among restaurants vying for top positions in the app by paying more to platforms. Such mechanisms have replaced the old model of restaurants employing their own couriers.

*Earnings Dynamics:* Platforms typically incentivize high earnings at the beginning (during the first 3–6 months), but gradually remove bonuses, reduce multipliers, and fail to adjust pay to account for inflation. This leads to a drop-off in courier retention and forces companies to continually launch new recruitment campaigns.

*“Everything they advertise is drastically different from reality. I have experience creating job postings for courier positions, and from that experience. Let me explain how this as I once helped create courier vacancies. Job posting platforms usually require you to list a salary. But how do you list a salary if one courier earned 100 UAH in a week [around 2 euros – author’s note] and another courier earned 15,000 UAH [around 300 euros – author’s note]? You simply take that one courier who made 15,000 UAH, multiply that by four weeks, and list it in the job ad. Why? Because technically it’s possible. Does that mean everyone will earn that much? Not at all. But the possibility exists.*

*I know that Bolt Food uses some companies that handle recruitment exclusively and hire couriers. They use any kind of spam imaginable to attract workers. They buy ads on Facebook, YouTube, Instagram – anywhere. And in those ads, they just write whatever numbers come to mind. Like I said, one courier out of a thousand got lucky and made that much. So they write it and promise that kind of salary.*

*Meanwhile, conditions are getting worse even though they promised not to change them – the easiest way not to break a promise is to make none at all. No one says your working conditions won’t change. No one says anything will improve. They just say nothing. And when they need to make it worse – they do.”<sup>40</sup>*

Accordingly, gig platforms in Ukraine use mass onboarding, promises of high earnings without long-term obligations. This approach allows platforms to scale quickly but creates a precarious labor market for the workers.

## Frameworks

Glovo justifies its strategy of hiring couriers without formal labor contracts by claiming it provides them **flexibility in choosing their working hours and workload**.

The company positions itself as a platform that connects customers, restaurants, and independent couriers – not as an employer. According to Glovo, couriers act as self-employed individuals who independently decide whether to accept orders. The company also states it

<sup>40</sup> UA-WP5-05\_national worker





has no obligation to provide couriers with a minimum workload, and couriers are under no obligation to accept every order – evidence, they argue, of the absence of employment relations.

Glovo emphasizes that couriers organize their own work and bear entrepreneurial risks themselves, such as transportation costs and wear and tear. The company references specific court rulings in European Union countries that recognize couriers as independent contractors, which lends additional legitimacy to their business model. They also point to the fact that many couriers work part-time, making formal employment arrangements impractical.

*“They say: ‘Maybe we would officially employ the couriers and give them some social protection... But look: if a courier works three hours a day or moonlights on different platforms, how are we supposed to hire them officially? What if one month they work full-time, and the next month only when they are off from their main job?’ And so they cite a lack of flexibility in the legislation – that’s their main argument.”<sup>41</sup>*

Nonetheless, this practice has drawn criticism in Ukraine as it deprives couriers of basic labor protections such as paid sick leave, insurance, and protection from dismissal.

The general trend in the EU and in Eastern countries (Singapore, South Korea) is also moving toward recognizing employment relationships and expanding social protections for platform workers.

*“The gig economy is fundamentally built on tax evasion [both on profit and on workers’ income – author’s note]. If they paid taxes like any other business according to the law, they’d simply go bankrupt – because this business model is stillborn. There’s just no revenue and no profits that would allow them to pay taxes and keep operating.*

*But since these brilliant entrepreneurs found a loophole not only in Ukraine but worldwide. They eventually became so big that they can’t simply be shut down. They found their niche. They don’t pay taxes, and that’s why their businesses don’t collapse. If they operated honestly, the business would simply be unprofitable. That’s all there is to it.”<sup>42</sup>*

- **Migrants and National Workers**

Before 2022, both national and migrant workers usually viewed platform work as a side hustle mostly for students.

*“I never seriously considered delivery as a primary career path, and I think that’s a common trait among everyone in this field. They see it as a way to make some extra money – to get by for a while until they find something more solid, more permanent.*

*This job is interesting only when you’re not dependent on it as your main source of income. As a side hustle, it’s not so much about the money as it is about being outside in the fresh air. It’s actually a pretty cool and interesting thing to do.*

---

<sup>41</sup> Expert focus group 1. National worker (2025)

<sup>42</sup> UA-WP5-05\_national worker





*Also, when new delivery services launch and offer relatively solid working conditions, or during certain periods – like now, during the holiday season, when there’s a shortage of couriers – it makes sense to do it. But I would never consider this as a career, as a primary source of income. More like a hobby.”<sup>43</sup>*

Thus, both foreign and national workers – mostly students – have consistently shown interest in courier jobs on platforms like Glovo for several reasons.

First, such work offers the ability to start earning quickly without complicated bureaucratic procedures or lengthy onboarding, which is particularly important for migrants or those seeking temporary income sources.

Second, the flexible schedule allows workers to choose their own working hours and workload, which appeals to people who have other responsibilities. Like students or parents with young children.

Third, the job requires no special qualifications or significant experience, making it accessible to a wide range of people, including those facing difficulties with formal employment or legal stay in Ukraine due to a lack of documents or language barriers. For many foreigners, it’s also a way to integrate into the local economy and improve their financial situation quickly and without unnecessary obstacles.

Since Russia’s full-scale invasion of Ukraine, new categories of workers joined this sector.

Internally Displaced Persons (IDPs), i.e. men and women who lost their jobs due to the war in territories occupied by Russia, as well as men seeking to avoid mobilization into the Armed Forces of Ukraine – often choose courier work on platforms like Glovo because of its accessibility and flexibility.

For IDPs, it is often one of the few available ways to quickly find a source of income in a new location without complicated formal employment, as they may lack necessary documents (lost during escape) or the time to go through formal hiring processes. Men avoiding mobilization opt for informal employment and allow them to remain under the radar of state authorities.

The flexible schedule and lack of strict obligations allow these groups to work on their own terms, making this format especially attractive in difficult socio-political circumstances. Thus, since 2022, for both IDPs and certain groups of men, informal platform-based delivery work has become a way to retain income and adapt to new conditions.

Overall, the employment strategies for both national and foreign workers, as well as their subsequent cooperation with employers in the food delivery sector, can be grouped as follows.

---

<sup>43</sup> Ibid.



## Employment Strategies

*Working through intermediaries:* In many Ukrainian cities – particularly Kyiv and Kharkiv – not all couriers are registered directly with the platform. Often, they work through individuals or FOPs who own a Glovo account. This strategy provides access to the platform without having to register a FOP in exchange for a share of the income (up to 20%). It also allows for informal work – without taxes or contracts – and fewer obligations. This approach is especially attractive to undocumented migrants and the mentioned categories of national workers.

*Combining multiple platforms:* To increase their earnings, many couriers work for several platforms at once. The most common combination is Glovo + Bolt Food. This allows them to switch between apps depending on the volume of orders, fill “dead hours” on one platform with orders from another, and avoid dependency on a single company.

## Strategies of Cooperation

*Optimizing personal ratings and hours:* Couriers try to improve their rating within the app, as this determines access to better time slots and higher-paying orders. This often means accepting orders in difficult weather conditions, completing deliveries as quickly as possible – sometimes at the expense of personal health – and avoiding cancellations or customer complaints.

*Organizing into informal communities:* In many cities, particularly Kyiv and Kharkiv, couriers participate in Telegram channels, Viber and Facebook groups, where they exchange information and informally unite to address urgent issues.

Thus, in order to adapt to unstable conditions and maximize their income, Glovo couriers and others in Ukraine employ flexible and informal employment and cooperation strategies – from working through intermediaries and combining platforms to optimizing their ratings and organizing into online communities.

At the same time, national workers who participated in interviews within WP5 shared the following view:

*“Knowing how the gig economy works is never redundant for those whose livelihood depends on it, and we’re not talking about migrants only. Gig platforms benefit from dividing people into ‘user categories’, where members of each group know little about each other. Awareness is an important tool for anyone interested in defending their rights, rather than sacrificing them on the altar of someone else’s economic success.”*

*Migrant and Ukrainian workers must unite and secure tools to influence their employers. Today, food delivery couriers are turning to informal online methods of worker mobilization to protect their rights. Unfortunately, these methods are often ineffective – especially when cases reach the courts.”<sup>44</sup>*

## Frameworks

The reasons that couriers use to justify their work on delivery platforms include:

---

<sup>44</sup> UA-WP5-05\_national worker





*Flexible and “free” schedule:* Many people are attracted to being able to choose their own working hours. This is convenient for students, migrants without stable employment, people juggling multiple gigs, parents with small children, and others. This flexibility is often seen as a better alternative to the rigid office schedules or factory work.

*Quick and “easy” start:* No experience, formal education, or extensive paperwork is required to begin – just a smartphone, transport (bike, scooter, car), and basic app literacy. This makes platform work appealing to migrants, IDPs, young people, or stateless individuals.

*Immediate payouts:* Couriers can receive weekly – and sometimes even daily – payments, which is crucial for those without financial safety nets. This makes the platform a source of quick cash in times of crisis, even if the earnings are modest.

*Lack of formal hierarchy:* Couriers have no direct supervisor, are not required to appear physically at an office, and can work anonymously or through intermediaries. Many view this as freedom from control, surveillance, and “bureaucracy.”

*The illusion of entrepreneurship:* Platforms promote the idea that a courier is a “partner,” their own boss, which allows workers to feel self-employed and independent. Some even attempt to build a “micro-business” – for instance, by using one account for a small team of couriers.

These factors – especially in wartime and amidst economic instability – make gig work appealing despite its inherent deficiencies.

- **State Authorities**

### **Non-Intervention Strategy**

According to labor law experts and lawyers, while state authorities have made some official statements and launched initiatives, their intervention into informal labor relations between food delivery platforms and couriers is limited. They formally recognize couriers’ self-employment and refuse to acknowledge employment relations between platforms and their workers.

- **Ministry of Economy of Ukraine** coordinates the implementation of state labor policy and shapes policies to combat informal employment. Yet, it has not initiated a systemic review of the couriers’ legal status in the gig economy.
- **Ministry of Social Policy of Ukraine** is responsible for labor relations, employment, social protection, pensions, and mandatory social insurance. Yet in the gig economy, it largely remains on the sidelines despite the clear social risks for these categories of workers.
- **State Labor Service of Ukraine (Derzhpratsi)** is the main body responsible for monitoring compliance with labor legislation. According to legal experts, it rarely conducts inspections of platforms and effectively does not recognize labor relations between platforms and couriers, instead citing their formal status as self-employed.





- **State Tax Service of Ukraine** – registers FOPs and monitors tax payments. With couriers, it limits its role to fiscal functions and does not analyze the employment’s legal nature.
- **National Mediation and Conciliation Service (NMCS)** may be involved in resolving labor disputes, but in practice, it is not engaged in issues related to platform employment, as such work is not officially classified as labor.
- **Office of the Ukrainian Parliament Commissioner for Human Rights (Ombudsman)** occasionally reviews complaints related to workers' rights violations but does not have the authority to define or alter employment status.

Ukrainian state authorities demonstrate insufficient intervention in the food delivery platform sector, effectively recognizing couriers as self-employed and avoiding the establishment of labor relations between them and the platforms. This translates into a low level of institutional activity: although the State Tax Service and the Ministry of Social Policy acknowledge problems related to unpaid taxes and lack of social protections for couriers, the scope of monitoring and inspections remains limited, and platforms are rarely held accountable. This approach preserves the informal nature of gig employment and perpetuates the social vulnerability of couriers.

## Frameworks

**State authorities justify their inaction** by citing the lack of appropriate legal frameworks and specialized instruments for regulating the gig economy. Referring to the absence of clearly defined criteria for labor relations in legislation, officials acknowledge the problem only with words as official statements not backed by effective measures. This legal ambiguity allows platforms to avoid obligations to both workers and the state, while depriving couriers of access to social protections and reducing public budget revenues.

Labor law experts also emphasize the need to strengthen state oversight of the sector:

*“In wartime conditions, when the budget is strained and we urgently need fiscal resources, it is absolutely critical to bring such businesses under state control. They must pay fair taxes. Insurance must be real. It should cover not only the delivery period but also other times. Labor inspectors must have the authority to determine whether the nature of these working relationships constitutes employment.”*

*“In the six years we’ve been discussing these issues in Ukraine, companies have made great strides in PR and crafting a more human-friendly narrative. But the state has not implemented innovative approaches to even monitor this sector. I’m not even talking about enforcement or sanctions – just data. I want to see the numbers.”<sup>45</sup>*

*“I think a particularly persuasive argument to ‘open doors’ is that Glovo earns a huge amount in Ukraine. It’s apparently their third-largest market globally – after Spain and Italy. They’ve grown significantly in recent years. A company earning this much and not providing any*

<sup>45</sup> Expert focus group 1. Expert lawyer (2025)





*benefit to the state, not paying taxes, should definitely be of interest – first and foremost to employers who operate transparently, and, of course, to state institutions.”<sup>46</sup>*

At the same time, respondents note that only now, in 2025, there’s growing awareness and intent to reform the delivery sector.

*“On May 27, there were committee hearings [of the Committee of the Verkhovna Rada of Ukraine on Social Policy and the Protection of Veterans’ Rights – author’s note] on domestic and platform work. The Ministry of Economy said: ‘We have a Eurodirective [Directive (EU) 2024/2831 of the European Parliament and of the Council of 23 October 2024 on improving working conditions in platform work – author’s note] – let’s figure something out.” For now, there are no laws, but if we want even minimal insurance, we should first define: who are platform workers, and what rights do they have.”<sup>47</sup>*

Representatives of Glovo and Bolt Food reportedly stated at the hearings that they support bringing the companies out of the shadows under conditions of reduced taxation<sup>48</sup>. However, labor law experts currently assess these statements as largely performative:

*“Yes, Uber and Bolt were present there, and they all said that they are ready to pay taxes, ready to take steps to ensure decent working conditions for couriers and drivers. But in reality, it ends with statements and loud words. If you look at what Glovo writes on their website about insurance – it’s just empty declarations and nothing more.*

*“So in my view, the first step really needs to be addressing the core issue: the status of platform workers. We need to gather a team of like-minded people and those who are ready to talk about it and advocate. And I mean not just civil society experts, but also those who make decisions at the governmental level.”*

Thus, throughout the entire period that food delivery platforms have been operating in Ukraine, the state has paid insufficient attention to regulating these issues, which has led to ongoing unequal conditions in the labor market and heightened social vulnerability for platform workers. However, we are now beginning to observe the first tentative steps and some political will to foster change.

### **Non-State Actors**

Non-state actors – including lawyers, legal advocates, trade unions, and human rights organizations – play a crucial role in advancing legal and social protections for food delivery couriers in Ukraine. Given that the state doesn’t pay attention to this group, these actors have taken the lead in defending the rights of workers in the gig economy:

*“Although the gig economy is often seen as precarious, and neither workers nor the broader society fully view it as a legitimate career, it still affects a large number of people. In Ukraine*

---

<sup>46</sup> Expert focus group 1. NGO (2025)

<sup>47</sup> Expert focus group 1. NGO (2025)

<sup>48</sup> Committee on Social Policy and Protection of Veterans' Rights. (2025, May 27). *Committee holds extensive discussion on the issue of domestic work in Ukraine: how “invisible” workers become “visible” and domestic work gains prestige.* Verkhovna Rada of Ukraine. [https://komspip.rada.gov.ua/news/main\\_news/77663.html](https://komspip.rada.gov.ua/news/main_news/77663.html)





*alone, tens or even hundreds of thousands are employed in this sector. So regulating it is urgent.”<sup>49</sup>*

At the same time, the strategies of non-state actors remain relatively limited in scope, often focused on supporting individual cases rather than achieving broader systemic impact. Many of these actors believe that progress toward legal recognition of an employment relationship between couriers and platforms – a key condition for adequate social protection – depends on coordinated efforts across multiple levels of society:

*“Singapore is a very recent example. Their law only came into force on January 1, 2025. And while we can't yet speak of a sweeping success, their relative progress came from the strong coordination of all three stakeholder groups: the state, the associations of platform workers, and the companies themselves. That synergy allowed them to pass legislation and secure certain protections for workers.”*

### Strategies

Lawyers support couriers by offering legal consultations, preparing lawsuits against platforms (particularly regarding the recognition of employment relationships), and providing litigation support. In the deceased courier's case, they have been working for over five years using both Ukrainian and international legal frameworks to create precedents that could be used by others in the future. The legal team views such cases not just as individual battles, but as part of a strategic effort to reform the gig economy as a whole.

As one of the lawyers involved in the case explained, their team is committed to building a strong legal argument informed by international jurisprudence:

*“Yes, the case has been going on for over five years now. But there's no need to rush. Everything has to be analyzed carefully to ensure the court fully upholds the claims. We want justice to prevail. And we want legal facts established that not only confirm employment relationships, but also highlight gaps in the law that companies exploit to evade taxes or conceal information.”<sup>50</sup>*

This case has garnered public attention and support from those advocating for the recognition of an employment relationship with Glovo. Its outcome is expected to influence not only similar lawsuits but also the future of the gig economy in Ukraine:

*“We're constantly reviewing court practices to track new, similar cases. But right now, there are no other lawsuits specifically targeting Glovo for establishing employment relationships. Until at least one court confirms such a relationship, it's unlikely that new cases will emerge.”<sup>51</sup>*

Trade unions provide targeted support to couriers, but their influence remains limited due to the lack of widespread union membership among delivery workers. They try to raise awareness about the importance of collective labor protection, especially among migrants, but have yet to gain broad support.

---

<sup>49</sup> Expert focus group 1. National worker (2025)

<sup>50</sup> UA-WP5-03\_lawyer

<sup>51</sup> Ibid.





Human rights organizations focus on raising awareness among both Ukrainian and migrant couriers about their rights and the importance of solidarity across all worker groups. They promote online mobilization and strive to build an information environment that helps workers understand the inner workings of the gig economy.

### Operating Context

Lawyers work in an environment of legal uncertainty, where criteria for defining employment relationships are either unclear or inconsistently applied. They view litigation not just as a tool for individual justice but also as a way to influence legal standards, draw state attention to tax evasion and worker vulnerability, and build legal precedents necessary to initiate further cases.

Trade unions attribute their limited presence to the lack of access to target audiences, resource constraints, and poor awareness among workers of the benefits of union membership. For foreign couriers, distrust toward unions often stems from reliance on informal conflict resolution (e.g., bribes) and a lack of belief in collective action. For Ukrainian couriers, resistance is often rooted in competition between workers and a preference for social media as a space to coordinate their activities.<sup>52</sup>

As human rights organizations lack direct legal tools, they mostly seek to educate and mobilize and aim to overcome couriers' isolation and apathy. Their limited effectiveness, especially online, is often explained by workers being scattered, distrust of formal institutions, and the difficulty of translating digital mobilization into legal or political action – particularly through the courts.

Lawyers, trade unions, and human rights organizations provide legal and advocacy support in isolated cases, helping couriers file lawsuits or submit complaints to government bodies. However, their overall influence at the national level remains low; there are only limited cases of sustained advocacy or mass mobilization. As a result, their impact on working conditions and public policy is restricted.

## 2.4. Interaction Between Key Actors in the Deceased Courier's Case

The high-profile case of a deceased courier and the most recent court decision dismissing the lawsuit in a legal battle that has lasted over five years underscores the extremely limited state response and the reluctance of platforms to recognize employment relationships. Despite persistent efforts and high expectations from NGOs and lawyers, the case has yet to lead to systemic change. It has, however, initiated public and political debate around the rights of platform workers.

This legal case provides a clear illustration of multi-level actor involvement throughout its duration, including:

---

<sup>52</sup> UA-WP5-01\_trade union





- **Kyiv District Court of Kharkiv** – the local first-instance court responsible for adjudicating the case in accordance with procedural law;
- **Supreme Court of Ukraine, Commercial Cassation Court** – one of four cassation-level courts within the Supreme Court, responsible for cassation proceedings in cases governed by commercial procedural law;
- **Plaintiff** – Valentyn Ivanov, father of the deceased courier;
- **Defendant** – GlovoApp Ukraine LLC;
- **Legal representatives for the plaintiff** – attorneys Vasyl Harashchak (formerly Artem Donets), from the law firm “Donets and Partners”;
- **Legal representative for the defendant** – attorney Yevhen Bolochovtsev, independent legal practitioner;
- **State Tax Service** – which received several formal information requests;
- **Third party** – the **State Labour Service**;
- **Additional agency** – the **North-Eastern Interregional Labour Safety Department**, a territorial division of the State Labour Service of Ukraine operating in the Sumy, Poltava, and Kharkiv regions. This body was created during an administrative reform that merged regional labour offices.

On March 9, 2025, the Kyiv District Court of Kharkiv issued a ruling that concluded case No. 953/3438/23 (Unified State Register of Court Decisions No. 126520585), originally filed on May 10, 2023, regarding the death of a courier in 2019, by fully dismissing the claim.<sup>53</sup>

#### CASE NO. 953/3438/23

##### Case Summary

A courier died while completing a delivery using the Glovo platform. The lawsuit argued that although there was no formal employment contract, the courier was in fact an employee.

##### The plaintiff requested:

- Recognition of an employment relationship between his son and Glovoapp Ukraine LLC from 09.07.2019 to 30.07.2019.

<sup>53</sup> Opendatabot. (n.d.). *Company profile: ТОВ "Гловоап Україна" (EDRPOU 42555522)*. Retrieved July 23, 2025, <https://court.opendatabot.ua/companies/42555522>





- Establishment of this relationship in order to claim compensation for the courier's death in a road accident on 25.07.2019.

#### **Plaintiff's Arguments:**

- **De facto employment:** The courier had access to the mobile application, completed orders, and was regularly engaged in work.
- **Regular payment:** He received systematic payments for completed deliveries.
- **Indicators of employment:**
  - Subordination via the app (ratings, penalties, order distribution),
  - Task execution control,
  - Possibility of contract termination for violations,
  - Use of corporate branding (backpacks, uniforms),
  - Restrictions on sick leave or vacation.

The plaintiff also referred to legal positions of the Supreme Court of Ukraine and the jurisprudence of Spanish courts (notably the 2020 ruling of the Spanish Tribunal Supremo), which recognized couriers as employees.<sup>54</sup>

#### **Defendant's Arguments:**

- The company had no employment or civil contracts with the deceased courier in 2019.
- The actual platform operator was Glovoapp23, S.L. (Spain) until October 2019; Glovoapp Ukraine LLC only received the franchise on 01.10.2019 (after the courier's death).
- The Glovo platform merely provided technological infrastructure, and its use did not establish employment obligations.
- The courier acted as an independent contractor (self-employed): he set his own schedule, accepted/rejected orders, used his own vehicle, and received no employment benefits.

#### **Position of the State Labor Service (Derzhpratsi)**

Confirmed that during an inspection in 2020, no facts were found indicating that the courier had been engaged by Glovoapp Ukraine LLC without an employment contract. The investigation into the death did not establish that he had performed labor functions within the meaning of the Ukrainian Labor Code.

#### **Court's Position**

<sup>54</sup> LegalToday. (2020, September 29). *The Supreme Court declares that riders are false self-employed.* <https://www.legaltoday.com/practica-juridica/derecho-social-laboral/laboral/el-tribunal-supremo-declara-que-los-riders-son-falsos-autonomos-2020-09-29/>





The court assessed the submitted evidence, including: bank statements (payment records), screenshots from the Glovo app, testimonies regarding the backpack, GPS routes, and witness statements. However, it concluded that none of the evidence proved the existence of an employment relationship between Glovoapp Ukraine LLC and the deceased courier. Referring to the legal indicators of an employment contract, the court determined that they were absent, as:

- There were no internal regulations, no work schedule, and no written agreement;
- No social guarantees or employer obligations (insurance, leave, sick pay) were provided;
- There was no proven control by Glovoapp Ukraine LLC over the courier's activities.

#### Legal Benchmarks in the Case

- **Labor Code of Ukraine (1971, in force):** Employment relationships are defined by criteria such as subordination, work schedule, remuneration, and protections.
- **Supreme Court of Ukraine rulings (2019–2023):** The presence of employment features should be evaluated not only formally but by the actual nature of the interaction.
- **International case law in EU countries (2020–2022):** Glovo was repeatedly recognized as an employer (e.g., in Spain, Italy, France). In contrast, Ukrainian practice remains opposite.

#### Conclusions

The court concluded that no employment relationship existed between the deceased and Glovoapp Ukraine LLC during the period 09.07.2019 – 30.07.2019. The claim was fully dismissed. An appeal has been filed against the ruling.

#### Significance of the Court's Decision

This ruling strengthens the legal position of platforms that operate exclusively through digital contracts and avoid employer obligations. At the same time, it highlights the weak legislative regulation of labor rights in Ukraine's gig economy as of 2025. In the international context, this ruling is conservative – it does not reflect the global trend toward rethinking employment relationships in the digital environment.

This was the last claim filed in 2023 in a series of legal proceedings related to the death of a courier, starting in 2020.





After the tragic incident in 2019 (while the courier was still in the hospital), representatives of GlovoApp Ukraine LLC contacted the courier's father. They advised him to collect medical documents and promised to cover the expenses later. After the courier's death, Glovo again offered to immediately compensate the losses in order to "settle the matter". However, the father sought a different resolution from the delivery company.

When V. Ivanov was told by the company that couriers are not employees but merely "platform users", he decided to take the case to court, declining the compensation offer.

*"The most important part of our dialogue with the company was the need to create conditions that would prevent such a tragedy from happening again",* the young man's father said on his YouTube channel.<sup>55</sup>

The first lawsuit seeking to establish the existence of an employment relationship between the deceased courier and the company "Glovoapp Ukraine" was filed in 2020 with the support of the law firm "Donets & Partners". Prior to this, on behalf of the victim's father, the lawyers had submitted formal requests to the State Labour Service (regarding violations of labour law) and the State Tax Service of Ukraine (regarding violations of tax law). These authorities acknowledged receipt of the appeals but refused to issue any orders. According to representatives of the law firm, this was because LLC "Glovoapp Ukraine" failed to respond to any of their inquiries.

In court, the defendant's representative presented the following arguments:

*"LLC 'Glovoapp Ukraine' does not enter into any type of relationship – neither employment nor civil law contracts. The backpacks can be purchased on OLX. The company does not interact with couriers in any way. What is signed electronically is a 'terms of use agreement' that regulates access to and use of the Glovo platform – this is a civil-law agreement for information services granting access to the platform. These are civil-law relations between the Spanish company and the couriers; no physical signatures are involved."*<sup>56</sup>

By order of the Kyiv District Court of Kharkiv dated March 30, 2020, the court refused to initiate proceedings in the case filed by lawyer A.A. Donets, acting on behalf of the plaintiff, against the interested parties – LLC "Glovoapp Ukraine" and the Main Department of the State Labour Service in the Kharkiv Region – seeking to establish a legally significant fact.

On April 14, 2020, lawyer Artem Donets filed a new claim with the Kyiv District Court of Kharkiv. In an effort to find additional witnesses in the case, a post was published on the law firm's website and the lawyer's personal page. It highlighted the number of courier deaths during deliveries, used the phrase "delivery of death,"<sup>57</sup> and called on witnesses to provide anonymous testimony. On January 24, 2022, the court ruled to leave the case without consideration.

<sup>55</sup> Ivanov, V. (2021, May 12). *Working as a courier for Glovo* [Video]. YouTube. <https://www.youtube.com/watch?v=QC02IDm0W0c>

<sup>56</sup> Ibid.

<sup>57</sup> Donets, V. (2021, October 1). *On the court decision regarding Glovo couriers* [Post]. Facebook. <https://www.facebook.com/AdvocatDonets/posts/pfbid0MF3wNYPfGe49tLd1tj9yGDqSfRzDSdQAboMqNEEVXrTv5SWcFJtqHQmepzaw8Ptqll>





In response, in 2021, GlovoApp Ukraine LLC filed a lawsuit for defamation. The delivery company demanded that the lawyers retract the information published in the May 2021 social media post by the law firm and compensate for significant non-material damage. They argued that a series of inspections initiated by the law firm found no violations in GlovoApp Ukraine LLC's actions. Therefore, the company was seeking to protect its business reputation in court.

On August 6, 2024, the Supreme Court of Ukraine, as part of the Commercial Cassation Court, issued a final ruling in case № 922/2993/21. It fully upheld GlovoApp Ukraine LLC's claim against lawyer Artem Donets and the law firm "Donets and Partners" for protection of business reputation. This marked the end of the second stage of legal proceedings against Glovo.

The ruling set a precedent that restricts criticism of digital platforms, even when that criticism concerns working conditions or violations in the gig economy. It strengthened the legal position of Glovo's Ukrainian franchise, reinforced a broad interpretation of business reputation, and highlighted the vulnerability of public legal and human rights statements. Despite this, the law firm announced its intention to appeal to the European Court of Human Rights, considering the decision unjust and a violation of freedom of expression.

In 2023, a new lawsuit was filed seeking to establish the existence of an employment relationship between the courier and GlovoApp Ukraine LLC. This claim was based on recent Supreme Court practice on what constitutes employment relationships. It was a response to an earlier State Labour Service's conclusion that had found no such relationship.

The defendants included GlovoApp Ukraine LLC and the newly created North-Eastern Interregional Labour Safety Office – a territorial body of the State Labour Service of Ukraine operating in Sumy, Poltava, and Kharkiv regions. On December 6, 2024, the court decided to involve this office in the proceedings, despite objections from Glovo. The company argued that the Labour Service had already examined the case.

Although a wider range of state actors are relevant when it comes to the recognition of workers' rights on platforms, the plaintiff's legal team is confident there is no need to expand representation in court:

*"We believe these parties are sufficient. Why? Because the interests of any other parties are not affected by this case. Yes, it may establish judicial practice, though not a legal precedent, as Ukraine's court decisions do not have binding precedent power. Still, they shape legal practice."<sup>58</sup>*

The plaintiff's representatives emphasized that it is the Ukrainian legal entity (GlovoApp Ukraine LLC), not the Spanish parent company, that should be the party to the employment relationship. This aligns with Glovo's own position in the defamation lawsuit, where GlovoApp Ukraine LLC was the claimant – contradicting its later claims of lacking jurisdiction in similar cases:

---

<sup>58</sup> UA-WP5-03\_lawyer





*“My position is this: if Glovo issues, including those concerning couriers, relate to the Spanish company, then why did ‘Glovo Ukraine’ file a defamation lawsuit against the law firm ‘Donets and Partners’ and lawyer Artem Donets?”<sup>59</sup>*

The plaintiff’s lawyers did not request the involvement of human rights or international organizations in the proceedings but believe that the case’s outcome could become important for them in the future. The legal recognition of employment relationships could serve as a key argument for international actors, human rights advocates, and trade unions focused on platform workers’ rights.

Thus, the courier death case revealed the complex and ineffective interaction among various actors, each playing a role in the prolonged legal process. Despite the efforts of the plaintiff’s lawyers, support from civil society organizations, and engagement with state institutions such as the Labour Service and the State Tax Service, the case ended in the dismissal of the claim – which has since been appealed. Both the trial court and the Supreme Court ruled that no employment relationship existed between the courier and GlovoApp Ukraine LLC, siding with the defendant’s arguments regarding the absence of a formal contract, subordination, or social guarantees.

State authorities formally involved in the case failed to ensure proper oversight of platform labour conditions or identify violations, highlighting their limited capacity to address new forms of employment. Meanwhile, the defendant used both legal arguments and a counterclaim for protection of business reputation, which succeeded. This counterclaim challenged the ability of lawyers and rights defenders to publicly criticize digital platforms, even in the context of labor rights advocacy.

Despite the lack of official recognition of employment relations, the plaintiff’s legal team continues the legal fight, filing new lawsuits and appeals, and declaring their intent to bring the matter before the European Court of Human Rights. Various institutions – including local and interregional Labour Service offices – have been involved, indicating an attempt to expand the field of legal accountability. At the same time, in interviews, the plaintiff’s representatives insisted the current list of parties is sufficient, stressing that the case has the potential to shape judicial practice, even if not precedent in the formal legal sense.

The interaction between courts, government agencies, lawyers, civil society, and the digital platform has not yet produced systemic change but has exposed the deep lack of regulation in platform work and the limited avenues for workers to seek justice within Ukraine’s legal framework.

## Conclusions

The case analysed in this chapter reveals a profound regulatory gap in labour relations within Ukraine’s gig economy. The absence of legal recognition of couriers as employees deprives them of access to social protection, insurance, and effective legal remedies in cases of injury

---

<sup>59</sup> Ibid.





or death. Despite five years of proceedings and the involvement of multiple actors – including state agencies, courts, lawyers, the company, and the public – the claim was ultimately dismissed, reinforcing the prevailing regulatory status quo.

In practice, couriers typically remain private individuals or register as sole proprietors (FOPs), paying taxes while remaining outside the scope of labour-law protections. Although platforms increasingly incentivise FOP registration, respondents indicate that this step rarely improves access to insurance or social benefits and mainly serves to formalise taxation. At the same time, evidence of direct employment in some supermarket-based delivery models suggests that informality is not inherent to last-mile logistics as such, but rather a defining feature of platform-based delivery arrangements.

Platforms such as Glovo consistently defend courier self-employment as a means of avoiding labour obligations and associated costs. This strategy is enabled by the limited engagement of public authorities: the State Labour Service and other relevant institutions have adopted a largely passive approach to regulating new forms of work, preventing effective oversight. The continued absence of a legal definition of employment in the gig economy allows platforms to evade responsibility and leaves workers in a persistent legal vacuum.

Foreign workers are particularly exposed within this framework. Those without legal residence or work status, or operating in the grey economy, have virtually no access to legal or social protection. Platform-declared insurance schemes offer little real coverage, failing to compensate medical costs, lost income, or non-pecuniary damage suffered by workers or their families. As a result, vulnerability is not merely individual but structurally embedded.

This case therefore illustrates the urgent need to legally define the status of platform workers, update labour legislation, and establish institutional mechanisms to monitor working conditions in emerging forms of employment – for both Ukrainian and migrant workers. In this context, respondents emphasised the potential role of external accountability and societal pressure in prompting legislative action:

*“Maybe international monitoring mechanisms will help us move in the right direction. Not by imposing, but by asking the state: ‘Explain what you’ve done and what you plan to do.’ But this request needs to come from society. And international institutions need to point out the way forward. Then the key actor – the Ukrainian parliament – will find itself in a situation where it can no longer turn away and will be forced to act.”<sup>60</sup>*

Taken together, the research findings indicate that the precarious labour conditions of migrant couriers are not accidental or transitional, but produced by the interaction of multiple structural factors. Irregular or unstable legal status functions as a key entry point into precarity, often arising from expired permits, rejected asylum claims, or the termination of family-reunification grounds. Once excluded from formal onboarding, migrants rely on borrowed identities, rented accounts, or third-party FOP registrations to access platform work. This vulnerability is reinforced by a platform employment model deliberately designed

---

<sup>60</sup> Expert focus group 1. Expert lawyer (2025)





to avoid the recognition of labour relations, combined with weak enforcement capacity and unclear tests for determining employment status.

These dynamics are further intensified by security-driven financial controls and institutional fragmentation. Banking restrictions, sudden account closures, and payment disruptions – affecting even some migrants with temporary legal status – limit access to earnings and complicate regularisation. Poor coordination between banks, migration authorities, and labour institutions exacerbates these barriers, while algorithmic management practices and minimal identity verification sustain widespread reliance on intermediaries and borrowed accounts. In cases of accidents or fatalities, this configuration frequently leaves families without access to compensation or legal recourse.

Overall, the interaction of (i) loss or absence of legal status, (ii) security-driven barriers to banking and payments, (iii) an employment model designed to avoid recognition, and (iv) weak enforcement reproduces a large mixed workforce – comprising both national and foreign workers – engaged in quasi-entrepreneurial arrangements with limited protections and high exposure to risk. Unless these structural conditions are addressed, platform-based delivery will continue to function as a pressure valve for labour shortages while entrenching informality and legal invisibility.

A shift toward decent work in this sector requires clarifying legal tests for employment status in the gig economy, normalising access to banking services for lawfully residing migrants, and equipping labour inspectorates and migration authorities with the mandate and capacity to enforce status determinations at scale. In the context of Ukraine's European integration and post-war reconstruction, addressing these systemic drivers is not only a matter of worker protection, but a prerequisite for aligning labour-market flexibility with rule-based governance.





## 3. Case 2: Retail Trade of Agricultural Goods

### 3.1. The Case in a Nutshell

This case focuses on migrants with irregular status who arrived in Ukraine from Belarus through legal channels, seeking protection and aiming for lawful employment.

The full-scale invasion by the Russian Federation – and the official support for this aggression by Belarus – put Belarusian citizens into a complex political situation. As a result, for a variety of reasons, they increasingly found themselves in a vulnerable position and became irregular migrants engaged in undeclared work. In an effort to earn a livelihood many low-skilled Belarusian migrants found opportunities by selling products at local markets.

Belarusian citizens started moving to Ukraine in August 2020. Following the August 9, 2020 election – officially declaring Alexander Lukashenko the winner – widespread protests erupted and were brutally suppressed by security forces. The authorities led a statewide campaign of widespread and indiscriminate violence and repression against peaceful civilians who protested against the falsification of the presidential elections.

According to the human rights center “Viasna,” as of November 2020, there were 146 political prisoners in Belarus, and more than 30,000 people<sup>61</sup> had been detained since the beginning of the election campaign.

To protect themselves and their families, many Belarusians were forced to flee their country. Ukraine became their primary destination due to the visa-free regime, as well as linguistic and cultural affinities.

Although Belarusian communities have been present in Ukraine since the 18th century, the largest wave of Belarusian migration took place in the 2020s. A key factor motivating forced migrants and asylum seekers was the support offered by civil society organizations such as the Free Belarus Center, one of the first groups to provide Belarusians with assistance in adaptation, legal aid, and psychological support.<sup>62</sup>

Many of those who considered relocating to Ukraine were individuals with an active civic stance in Belarus. In Ukraine, they hoped to obtain residence permits and find legal employment.

According to the State Border Guard Service, around 70,000 Belarusian citizens entered Ukraine between August and September 2020 alone. Throughout that year, Belarusians crossed the Ukrainian border a total of 465,000 times<sup>63</sup>. However, this figure likely includes repeat crossings and those who entered Ukraine but did not remain long-term.

More specific data about those who chose to stay in Ukraine was provided by the State Migration Service (SMS). As of September 1, 2021, the agency had issued 520 permanent

<sup>61</sup> Center for Civil Liberties. (2020). *How Ukrainians can help Belarusians* [Video]. YouTube. <https://www.youtube.com/watch?v=IEKEGkLtVNk>

<sup>62</sup> Ukrainer. (2021). *Belarusians: Who are they?*: <https://www.ukrainer.net/bilorusy/>

<sup>63</sup> Consultation with the State Border Guard Service of Ukraine (March 14, 2025)





residence permits and 2,260 temporary residence permits. It also denied 560 Belarusian citizens permanent residence permits and rejected 2,154 applications for temporary residence<sup>64</sup>.

The official reasons for these denials were not disclosed. However, we assume that this is due to the ongoing war. Commenting on the high number of rejections, the head of the SMS stated:

*“We do not cooperate with the Belarusian government or the Russian authorities. We are often accused of collaborating with them and therefore refusing entry or protection to citizens of these countries who flee and seek protection in Ukraine.”<sup>65</sup>*

According to SMS representatives, Belarusian citizens seeking political asylum were not granted any preferential treatment temporary-protection-wise. They explained that the “forms and grounds for granting protection to foreigners and stateless persons in Ukraine are the same for everyone and are clearly defined by the Law of Ukraine ‘On Refugees and Persons in Need of Additional or Temporary Protection.’<sup>66</sup>

When Russia launched a full-scale war against Ukraine, Ukraine limited its cooperation with Belarus. The Belarusian troops participated in the invasion alongside Russia, and Russian missiles were launched at Ukraine from the Belarusian territory. Yet Ukraine has not officially recognized Belarus as an aggressor state. Ukraine has maintained diplomatic relations with Minsk, and the International Criminal Court has not yet launched proceedings concerning the involvement of Belarusian military personnel in the war.

Under international diplomatic law, Belarus is considered an involuntary accomplice – a state that does not directly participate in warfare but provides its territory and infrastructure to a belligerent country.

According to respondents, this legal and geopolitical position stops Ukrainian authorities from supporting Belarusian migrants: “Ukraine fighting a war must be taken into account. We have officially recognized aggressor states and states that facilitate aggression. Belarusians are effectively and automatically classified under the latter. It’s a general approach that prevents the individual review of specific cases.”<sup>67</sup>

Despite this, hundreds of Belarusians volunteered to fight on Ukraine’s side against Russia. This somewhat shifted public perception of Belarusians in Ukraine to a more positive direction. Still, law enforcement authorities have tightened control over Belarusian migrants who express a desire to remain in Ukraine beyond their permitted stay.

---

<sup>64</sup> Ministry of Internal Affairs of Ukraine (January 4, 2022). *Nataliia Naumenko: Uncontrolled migration from Ukraine is a risk of losing visa-free regime.*

<https://mvs.gov.ua/press-center/news/nataliya-naumenko-nekontrolyovana-migraciya-z-ukrayini-ce-rizik-vtrati-bezvizu>

<sup>65</sup> Ibid.

<sup>66</sup> Verkhovna Rada of Ukraine (2014). *Law of Ukraine “On ensuring the rights and freedoms of internally displaced persons”, No. 3671-17, dated October 20, 2014.* <https://zakon.rada.gov.ua/laws/show/3671-17#Text>

<sup>67</sup> Expert Focus Group 2 (2025), expert from a human rights organization.





The military and political context is critically important in this case and has significantly shaped the conditions, treatment, and overall attitude toward Belarusian citizens in Ukraine – from law enforcement agencies and relevant government bodies to broader society.

The exact number of Belarusians who arrived in Ukraine after 2022, however, remains unknown due to the lack of data. But it is also clear that their numbers have increased compared to the pre-war period.

Many of the Belarusians who came to Ukraine were young, of working age, and highly educated. Among them were IT specialists, lawyers, cultural figures, and civic activists. Prior to the full-scale Russian invasion, the Ukrainian government actively sought to attract Belarusian IT professionals, expanding quotas for the admission of highly skilled foreign IT workers. Around 5,000 Belarusians took advantage of this opportunity<sup>68</sup>. However, a significant portion of them later relocated to Poland in search of better living conditions.

Less attention has been paid to lower-skilled Belarusians who also fled their country in defiance of the Lukashenko regime. These migrants did not receive the same level of assistance or employment facilitation from Ukrainian authorities.

Before the war's escalation in 2022, the Cabinet of Ministers of Ukraine adopted a resolution that allowed Belarusian citizens to remain in the country for up to 180 days – compared to the standard 90-day limit within a six-month period for most other foreigners.<sup>69</sup>

This resolution specified that Belarusian citizens who are entrepreneurs or highly qualified specialists – especially in IT and innovation – whose immigration is deemed to be in Ukraine's national interest, could apply to the SMS for a fast-tracked temporary residence permit.

Human rights advocates criticized this measure as little more than a "mathematical adjustment." Formally, the regulation appeared to extend permitted stays, but in practice the total number of days – six months within a year – remained unchanged: *"In any case, this was a positive step, and we welcomed it. People often don't have enough time in three months to get their bearings. Many had to flee urgently to escape repression, and needed time to figure out their next steps. Half a year makes that easier. But this isn't a radical shift and no real steps have been taken to improve or ease the situation for Belarusian citizens here."*<sup>70</sup>

As of 2021, Belarusians who were forced to leave their homeland and seek a better future in Ukraine could be broken down into three groups:

<sup>68</sup> Deutsche Welle. (2020, October 6). *Battle for brains: How Ukraine is trying to lure Belarusian IT specialists*.

<https://www.dw.com/ru/borba-za-mozgi-kak-ukraina-pytaetsja-peremanit-belorusskih-it-specialistov/a-55277492>

<sup>69</sup> Ministry of Internal Affairs of Ukraine. (December, 29, 2021). *The government extended the resolution allowing Belarusian citizens to stay in Ukraine for 180 days per year*.

<https://mvs.gov.ua/uk/press-center/news/uryad-prodovziv-diyu-postanovi-yaka-dozvolyaje-gromadyanam-bilorusi-perebuvati-v-ukrayini-180-dniv-na-rik?fbclid=IwAR0YrpBsrgcGsPU4kwY0AOISbBHOx-kpZBdF0FbIERzwgQ1n8N9njDFOQW>

<sup>70</sup>

Pyrlyk, H. (October, 15, 2021). *Why Belarusians fleeing persecution struggle to legalize their stay in Ukraine*. Radio Svoboda.

<https://www.radiosvoboda.org/a/chomu-bilorusam-yaki-vtekly-vid-peresliduvan-skladno-lehalizuvatysya-v-ukrayini/31510732.html>





1. Political migrants fleeing repression, imprisonment, and the suppression of free speech.
2. Priests and pastors from Catholic, Greek Catholic, and Protestant churches.
3. Entrepreneurs escaping economic repression – such as arbitrary tax policies or the politicization of business, where entrepreneurs critical of the regime become targets of unfounded inspections or legal action.<sup>71</sup>

This analysis focuses specifically on the entrepreneurs, many of whom imported food to Ukraine.

While Belarusian citizens may set up a business in Ukraine, they face numerous obstacles and restrictions. In 2022, the assets of Belarusian companies were frozen or seized; some were later sold off through auctions.

Still, “Ukrainian and Belarusian businesses continue to seek ways to cooperate, one way or another. Because of the difficulties, this often takes place through intermediary firms, third countries, or grey-market schemes. For example, food products from the occupied territories are transported to Belarus, and some Belarusian goods make their way to Ukraine via third countries.”<sup>72</sup>

Belarusian products like milk, kefir, cheese, ice cream, candy, and beer remain popular in Ukraine. Experts note that Belarus maintains high standards for food production, and its strict food safety system has helped its products retain a leading position in terms of natural quality. Before the war, Belarusian food products held a 3% share of the Ukrainian market. However, following the full-scale invasion and consumer boycotts – along with public calls to avoid Belarusian goods – these products were pushed into the shadows and can now be primarily found through online retailers.<sup>73</sup>

Business owners specializing in food products have been closing their businesses and relocating to other countries after encountering problems with bank accounts in Ukraine.

As for low-skilled Belarusian migrants, despite the relatively easy entry conditions and formal support from the Ukrainian authorities, many face serious challenges with legalizing their status and social integration, particularly in terms of employment. According to lawyers and legal advocates, one of the main obstacles to formal employment is the blocking of Belarusian migrants' bank accounts by the Security Service of Ukraine and Ukrainian banks<sup>74</sup>.

Unable to obtain work permits or residence documents in Ukraine, apply for a Schengen visa, or return home, many Belarusians find themselves trapped.

<sup>71</sup> Bezpyatchuk, Z. (October, 18, 2019). *Transit stop: Belarusians seek asylum in Ukraine*. Ukrainian Week.

<https://tyzhden.ua/tranzytna-zupynka-bilorusy-shukaiut-prytulku-v-ukraini/>

<sup>72</sup> Free Belarus Center. (November 5, 2024). *Belarusian-Ukrainian Relations Index*. <https://freebelaruscenter.org/?p=2245>

<sup>73</sup> 5 Kanal. (2021, May 17). *Are Ukrainians ready to boycott Belarusian products and how will this affect the neighbor state's economy?* <https://www.5.ua/suspilstvo/chy-hotovi-ukraintsi-vidmovytsia-vid-biloruskoi-produktsii-ta-iak-tse-vplyne-na-ekonomiku-derzhavy-susidky-siuzhet-245516.html>

<sup>74</sup> UA-WP5-03\_lawyer





This crisis has created a number of serious humanitarian challenges for Ukraine in the areas of migration law and human rights.

### 3.2. Labor Migrants' Working Conditions

Human rights advocates describe the situation of labor migrants from Belarus as critical, citing numerous barriers preventing them from working legally or receiving proper compensation. The main challenges include frozen bank accounts, difficulties obtaining work permits, and a lack of clear procedures for unfreezing accounts.<sup>75</sup>

*“There are also many problems when it comes to accessing banking services. For example, Belarusian nationals may register as private entrepreneurs. Even with a temporary residence permit, they can officially register as individual entrepreneurs in Ukraine. But in practice, even if a bank does open an account for such activities, it is often blocked again within two days.”<sup>76</sup>*

These obstacles make it extremely difficult for migrants to work legally or get paid. As a result, many are forced either to leave Ukraine or to accept informal jobs that require no documentation and pay in cash without taxes. A portion of these migrants find work in local markets, selling products such as fruits and vegetables. This area is less regulated by state authorities and remains a “grey zone” with no social guarantees, such as pension coverage. The working conditions in such cases are entirely dependent on the market owner, which often leads to labor exploitation, as workers are forced to accept whatever terms are offered.

**The working conditions of migrants involved in the retail trade of agricultural products in Ukraine underwent significant changes between 2019 and 2023.** These shifts were shaped by a combination of internal and external factors, including economic hardship, the COVID-19 pandemic, and the full-scale war.

**In 2019**, Ukraine’s agricultural sector had a high level of informal employment – 51.7% – indicating that a large proportion of workers, including migrants, were working without official contracts and thus without social protections.

When **the pandemic began in 2020**, temporary border closures limited migrants’ ability to travel abroad, forcing many to seek work within Ukraine, particularly in informal retail markets. However, due to a lack of integration programs and support, working conditions remained difficult.

**Following the full-scale Russian invasion in 2022**, the labor market situation worsened. Many Ukrainian men were conscripted, creating labor shortages in various sectors, including retail trade. This opened new opportunities for migrants but also increased competition.

In 2023, there were signs of partial economic recovery, but working conditions for migrants remained unstable. While some companies began introducing programs to attract migrant

<sup>75</sup> UA-WP5-23\_human rights organization

<sup>76</sup> Ibid.





labor, the overall level of informal employment stayed high, limiting migrants' access to social guarantees and stable income.

**Yes, migrants can unofficially work at the Ukrainian retail markets. It's illegal, yet widespread.**

Foreign nationals' legal employment is regulated by the Law "On Employment of the Population" and other relevant acts. To work legally, foreign citizens must obtain a work permit from the State Employment Center. However, this process is highly bureaucratic, complex, and expensive – often posing a major barrier to migrants.<sup>77</sup>

As a result, many migrants choose **informal employment**, particularly in markets, where authorities have a weaker oversight. Retail trade is a sector where formal employment is often not required.

This kind of informal work carries several risks:

- No social protections (sick leave, vacation, pension benefits);
- Risk of labor exploitation;
- High risk of deportation if migration authorities conduct checks.

The Ukrainian government occasionally increases enforcement against illegal foreign employment. However, due to economic challenges and labor shortages in certain regions, **informal work – especially in retail – remains common.**

Employment in informal trade reveals the double vulnerability of migrants. First, market work is often part of the shadow economy. Second, the trading spots themselves may be informal and unregulated, making them unsafe and potentially exposing migrants to physical and psychological abuse.

Respondents in consultations and interviews noted that *"Although Ukraine has a law on employment that regulates formal hiring, in practice the process of obtaining permits is burdensome and bureaucratically exhausting for migrants."*

These administrative barriers often prevent Belarusian migrants from working in their professional fields, especially since their educational credentials have not been recognized by Ukraine. Meanwhile, language does not generally pose a barrier to communication, as all Belarusians can speak Russian and understand Ukrainian well.

Still, language skills do not solve registration issues, which complicate housing searches. For example, some Belarusian migrants were unable to secure private housing due to complex registration procedures and high rental costs. In such cases, many ended up renting shared dormitory rooms with several people. Only those who had friends or relatives in Ukraine were able to find better housing solutions.

---

<sup>77</sup> Expert focus group 2. Expert lawyer (2025)





*“I work as a private entrepreneur (FOP). My wife and I also volunteer, which allows us to remain in Ukraine. The biggest challenge for us is legalization. The second one is registration. People are afraid to register us at their addresses, saying we might claim the property and be hard to remove. I have a friend here who helped us.”<sup>78</sup>*

Lawyers interviewed during this analysis also mentioned cases where landlords refused to rent to Belarusians because of their nationality. *“Local people prefer to rent to locals.”<sup>79</sup>*

In practice, the lack of residential registration deprives individuals of access to a wide range of services, including education, preschool, and administrative services. This is a form of unequal treatment and discrimination against migrants in their access to other fundamental rights. According to Part 2 of Article 2 of the Law of Ukraine “On Freedom of Movement and Free Choice of Place of Residence in Ukraine,” registration – or lack thereof – cannot be used as a condition for exercising the rights and freedoms guaranteed by the Constitution, laws, or international treaties of Ukraine, nor as grounds for restricting them.<sup>80</sup>

As one respondent noted: *“Our state does nothing to help Belarusian migrants obtain refugee status. They face the same difficulties as other foreigners. What gives us some hope is that officials and law enforcement agencies understand the nature of political migration from Belarus and do not comply with Minsk’s extradition requests for those fleeing persecution.”<sup>81</sup>*

### 3.3. Actors’ Strategies and Frameworks

- Employers

#### Frameworks

The main legal framework applicable to employers who allow workers to perform labor without signing an employment contract and without notifying the State Tax Service consists of administrative liability. It comes in the form of fines and orders.

According to Ukrainian legislation, violations of labor law can result in fines equivalent to ten minimum wages. If the same violation is repeated within two years, the fine increases to thirty minimum wages per affected worker.<sup>82</sup> Penalties are imposed in cases such as:

- Actual admission of an employee to work without a formal employment contract (or agreement);
- Hiring an employee under a part-time or zero-hour contract when in fact the person works full-time; tax-free wages or remuneration

<sup>78</sup> Tereshchuk, H. (2022, February 12). *“It’s mentally easier and more soulful here”*: Three stories of Belarusian refugees who would like to stay in Ukraine. Radio Free Europe/Radio Liberty.

<https://www.radiosvoboda.org/a/rezhym-lukashenko-putin-bilorus-bizhentsi/31699393.html>

<sup>79</sup> Expert focus group 2. Human rights organization (2025)

<sup>80</sup> Verkhovna Rada of Ukraine. (2004). *Law of Ukraine “On Freedom of Movement and Free Choice of Place of Residence in Ukraine,” No. 1382-IV, April 11, 2004*. Official Bulletin of the Verkhovna Rada of Ukraine, No. 15, Art. 232.

<https://zakon.rada.gov.ua/laws/show/1382-15#Text>

<sup>81</sup> Expert focus group 2. Human rights organization (2025)

<sup>82</sup> Liga.Zakon. (2024, January 3). *What will be the fines for labor violations in 2024?*

[https://biz.ligazakon.net/news/222867\\_yak-budut-shtrafi-za-trudov-porushennya-u-2024-rots](https://biz.ligazakon.net/news/222867_yak-budut-shtrafi-za-trudov-porushennya-u-2024-rots)





Employers are also held liable if they obstruct or interfere with labor inspections aimed at identifying such violations.

The State Labor Service and the Tax Service develop the liability frameworks for business owners. These agencies have joined efforts to run an extensive educational and informational campaign for employers. The campaign focuses on the benefits of formal employment and the risks of undeclared labor.

*“Are you a business owner hiring workers without formal contracts? Be prepared to spend time and resources on training – experienced professionals won’t work for you, or they’ll quickly find better opportunities. You’ll face difficulties obtaining bank loans or attracting investment. And if the labor inspector pays a visit, you could face a substantial fine for violating labor law.”<sup>83</sup>*

In their communications with businesses, the authorities also appeal to employers’ social responsibility, stressing that tax evasion and non-payment of social security contributions force the state to increase taxes on law-abiding businesses to fund pensions, healthcare, education, and infrastructure.

Regulatory bodies have increasingly framed undeclared work as a serious threat in the context of the full-scale war. They argue that when all of the country’s resources are focused on securing victory, informal employment and the shadow economy undermine national defense. Some employers, motivated by profit, avoid formal labor contracts and fail to pay taxes, further weakening the state’s ability to respond effectively in wartime.

*“Dear employers, registering your workers and paying taxes is not just a legal obligation – it’s a patriotic duty, especially during wartime. Losses from undeclared labor exceed 100 billion UAH annually – funds that could increase national defense spending by 20%.”<sup>84</sup>*

## Strategies

Many employers prioritize quick profits and knowingly exploit the vulnerability of migrant workers. Some justify hiring migrants by framing it as a “humanitarian mission,” claiming they are simply offering people in need an opportunity to work. Others argue that it is the migrants themselves who ask to be paid in cash and off the books, often because their bank accounts have been frozen.

For small and medium-sized businesses, another common strategy is the rapid replenishment of cheap labor, especially as the demographic situation in Ukraine has significantly worsened four years into the full-scale war. Retail and agricultural sectors, among others, are in urgent need of workers.

---

<sup>83</sup> State Labor Service of Ukraine. (2024, April 11). *The State Labor Service and the State Tax Service continue joint efforts to promote legal employment.*

<https://dsp.gov.ua/main-news/derzhpratsi-i-dps-prodovzhuut-spilnu-robotu-shchodo-populiaryzatsii-lehalnoho-pratsevlashtuvannia/>

<sup>84</sup> State Tax Service of Ukraine. (2023, March 6). *A new stage of joint work to reduce the level of undeclared labor.*

<https://www.tax.gov.ua/media-tsentr/novini/659373.html>





Another approach is to “test” workers before offering formal employment. Employers may initially hire someone informally to assess their performance and, if satisfied, may offer legal employment later. However, this is only possible if the migrant resolves issues related to temporary residence permits and access to banking services.

- **Labor Migrants**

Political repressions under President Lukashenko’s regime forced many socially active Belarusians to flee in 2020 in search of protection and opportunities. Russia’s full-scale invasion of Ukraine, and the Belarusian government’s support of the aggressor, dramatically affected the situation of Belarusian migrants in Ukraine. People have faced increased scrutiny from law enforcement and restrictions, especially difficulties in renewing temporary residence permits and accessing bank accounts. These challenges forced many to relocate to Poland, while those who remained often turned to undeclared work, particularly selling agricultural products in markets.

Belarusian migrants are drawn to market trading for economic and social reasons. It requires minimal investment, no special qualifications, and only basic language skills, making it accessible to recent arrivals without legal status or job options.

With limited access to formal employment, many migrants turn to the informal economy to survive. Selling fruits and vegetables provides basic income and is often supported by informal ethnic networks. Markets also become spaces where migrant communities form support systems that help newcomers find housing, work, and adapt to local conditions.

Government integration programs are often ineffective and offer little opportunity for social or professional advancement, leaving many migrants stuck in petty trade for prolonged periods.

### **Constraints Faced by Migrants**

For Belarusian migrants in Ukraine, one of the main constraints stems from the sharp deterioration in relations between Ukraine and the Republic of Belarus as a result of the war. A lingering atmosphere of mistrust and heightened scrutiny by law enforcement has led to disproportionate attention on Belarusian nationals. This, in turn, has resulted in the neglect of migrants’ basic needs, pushing many to rely on undeclared work – such as selling agricultural goods at markets and roadside stalls – as a means of survival.

As a result, migrants often lose their professional qualifications and are unable to fully realize their labor and intellectual potential. Long-term engagement in the informal economy also contributes to their social and economic marginalization within Ukrainian society.

### **Strategies**

Belarusian migrants typically seek temporary protection in Ukraine, drawn by its linguistic and cultural similarities.

Interviews with migration experts and analysis of legal cases show that the employment of foreign nationals often takes place within ethnic networks, where business owners or





managers prefer to hire fellow countrymen. This pattern can be explained by the role of solidarity mechanisms and the practical comfort of working with people who share a common language, culture, and work ethic.

Many migrants view the difficulties they face as temporary and aim to use their time in Ukraine to prepare for onward migration to countries like Poland, Lithuania, or elsewhere in the European Union, in search of better living conditions and greater stability.

- **State Actors**

The topic of undocumented migrant labor has been discussed in public and political debates since 2020, triggered by the authoritarian regime of President Lukashenko in Belarus and the resulting repression.

### Law Enforcement Frameworks

The key state actors involved are the Ministry of Internal Affairs, the Security Service, and the State Migration Service. **These three agencies approach the issue of Belarusian migrants primarily through the lenses of security and control. This approach has contributed to increased bureaucratic obstacles, political inertia, and reluctance among some government bodies to simplify procedures for migrants.** The influence of the Security Service in Ukraine is significant and extends to other government agencies. A major focus of their control has been bank accounts, due to concerns over money laundering risks and financing of the aggressor country.

In March 2022, one month after the full-scale invasion, the National Bank of Ukraine, following SBU recommendations, prohibited the use of payment cards issued by Russian and Belarusian banks in Ukraine. This included:

- Blocking deposits to accounts of individual clients via transfers using such cards;
- Banning the acceptance of these cards in Ukraine, including transactions, payments, and cash withdrawals. *“Financial support for armed aggression against Ukraine must be stopped. Cards from aggressor state banks will not function in Ukraine. The enemy will no longer be able to send funds to terrorists or their supporters,”* – Deputy Governor of the National Bank of Ukraine, Oleksii Shaban.<sup>85</sup>

When migrants’ bank cards were blocked, the State Migration Service supported SBU and NBU’s decisions, often complicating resolution of such cases and revealing a lack of political will to foster change. Quote: *“The NBU’s resolution on restrictions for citizens of aggressor states (Russia and Belarus) applies to all foreign nationals in Ukraine or abroad. It concerns any transfers between Ukrainians and legal or natural persons from Russia and Belarus.”*<sup>86</sup>

<sup>85</sup> National Bank of Ukraine. (2022, March 2). *Bank cards issued by banks of Russia and Belarus are banned in Ukraine.* Retrieved from <https://bank.gov.ua/ua/news/all/platijni-kartki-bankiv-rosiyi-ta-bilorusi-zaboroneni-v-ukrayini>

<sup>86</sup> Liga.net. (2022, April 21). *Restrictions on currency transactions with legal entities and individuals from Russia or Belarus: NBU clarifies.* [https://biz.ligazakon.net/news/210713\\_obmezheniya-valyutnikh-operatsiy-z-yuridichnimi-ta-fzichnimi-osobami-z-ros-abo-blorus-rozjasnennya-nbu](https://biz.ligazakon.net/news/210713_obmezheniya-valyutnikh-operatsiy-z-yuridichnimi-ta-fzichnimi-osobami-z-ros-abo-blorus-rozjasnennya-nbu)





Another issue is law enforcement's general lack of concern for migrants' social protection or legal employment. A notable exception is the Ombudsman's Secretariat, which took a more balanced stance.

### Ombudsman's Framework

The Ukrainian Parliament Commissioner for Human Rights (Ombudsman) has provided mainly informational and consultative support to migrants. While maintaining communication with law enforcement bodies, the Ombudsman avoided direct confrontation. This reserved stance is framed by martial law and the migrants' origin from an aggressor state.

During an expert focus group, an Ombudsman representative stated: *"Most of them are unaware of their rights. They do not know how to exercise their rights, which is why they're often violated – they don't turn to public authorities for help."*<sup>87</sup> In one official statement, the Ombudsman's Office noted: *"If a Belarusian citizen does not have a permanent residence permit in Ukraine, they must apply to the Security Service of Ukraine to be added to the pre-approved list allowing banks to conduct payment operations."*<sup>88</sup>

However, lawyers specializing in Belarusian migrant issues noted that this clarification had little practical effect. The SBU often delayed or outright denied such applications.<sup>89</sup>

### State Agency Strategies

Law enforcement agencies operate **on the premise that as long as the war continues, strict controls over citizens of countries allied with the aggressor are not excessive and largely justified.** They argue that a policy review is only possible when high-intensity combat is over.

**The Ombudsman's strategy has been to avoid open conflict with security agencies and instead provide legal consultations.** The human rights dimension of this strategy is narrow and primarily focused on individual support for migrants, with each case handled separately and yielding only temporary solutions.

Limited political will and bureaucratic inertia explain the lack of a general or sectoral policy on irregular labor migration – not only from Belarus but from other countries too. Agencies such as the SBU, Ministry of Internal Affairs, and the Migration Service are reluctant to simplify procedures due to fears of increased migration flows or demands for additional resources. *"Unfortunately, the procedure is not transparent. The National Bank resolution includes a mechanism for unblocking cards through an SBU decision, but the procedure is vaguely and inadequately defined,"* one respondent noted.<sup>90</sup>

<sup>87</sup> Expert focus group 2. Office of the Ombudsman. (2025)

<sup>88</sup> Ombudsman of Ukraine. (2023, July 10). *Do citizens of Belarus and the Russian Federation residing in Ukraine have the right to use banking services during martial law?*

[https://www.ombudsman.gov.ua/en/news\\_details/chi-mayut-pravo-gromadyani-bilorusi-ta-rosiyi-yaki-perebuvaly-na-teritoriyi-ukrayini-koristuvatis-bankivskimi-poslugami-v-umovah-voyennogo-stanu](https://www.ombudsman.gov.ua/en/news_details/chi-mayut-pravo-gromadyani-bilorusi-ta-rosiyi-yaki-perebuvaly-na-teritoriyi-ukrayini-koristuvatis-bankivskimi-poslugami-v-umovah-voyennogo-stanu)

<sup>89</sup> Expert Focus Group 2. Lawyer. (2025)

<sup>90</sup> UA-WP4-19\_lawyer





- **Non-governmental actors**

Representatives of civil society organizations and associations, employing specialized migration lawyers and advocates, have been actively involved in addressing the issues faced by migrants from Belarus. Among the most active organizations between 2020 and 2023 were the Free Belarus Center, the Center for Civil Liberties, Right to Protection, the Helsinki Human Rights Union, and others.<sup>91</sup>

Advocating for equality and protecting human rights, activists were among the first to stand up for the rights of migrants. Members of these organizations became a reliable platform for proactive actions defending Belarusian citizens in Ukraine. For example, they prepared a formal appeal to the State Migration Service requesting resolution of problems related to residence permits.

This appeal was triggered by the case of a Belarusian migrant woman who, after the controversial ban imposed by the Belarusian president on issuing and renewing passports abroad, was fined by Ukrainian law enforcement for having an expired identification document.

In response to the activists' inquiry, the State Migration Service emphasized that in August 2023, the Cabinet of Ministers submitted a bill to the Verkhovna Rada, stipulating that foreigners – specifically including Belarusians – who acquired citizenship after February 24, 2022, will have one full year after the end of martial law to submit documents confirming the termination of their foreign citizenship. During martial law and for 30 days following its end, expired residence permits will allow legal entry and lawful stay in Ukraine.<sup>92</sup>

However, this response did not change the actual situation regarding social protection and employment for Belarusian migrants.

Alongside activists, other relevant actors such as international organizations and the Ombudsman's Office are involved in policy implementation, providing legal aid and consulting migrants. One respondent noted, "We ourselves direct these people to the Ombudsman's Office, because the Ombudsman communicates directly with the individuals and acts in their specific interests." During the focus group, a representative of the Ombudsman's Office stated, "*There were many appeals in 2023–2024 when the current Belarusian authorities, violating their citizens' rights, deprived them of the ability to process documents through foreign diplomatic missions. Regarding banking services, indeed, last year (2024) we received 24 appeals. We worked on these cases, and after sending letters to the National Bank of Ukraine, almost all violations were restored.*"<sup>93</sup>

However, human rights lawyers do not entirely agree with this positive assessment of the Ombudsman's work. During interviews, they reported that although migrants regained

<sup>91</sup> Free Belarus Center. <https://freebelaruscenter.org/>

<sup>92</sup> Free Belarus Center. (2024, January). Concerning the expiration of passports of the Republic of Belarus and the possibility of obtaining a return certificate  
[https://freebelaruscenter.org/wp-content/uploads/sites/6/2024/01/vidpovid\\_free\\_belarus-ctnter\\_zakinchennya\\_pasporti\\_v.pdf](https://freebelaruscenter.org/wp-content/uploads/sites/6/2024/01/vidpovid_free_belarus-ctnter_zakinchennya_pasporti_v.pdf)

<sup>93</sup> Expert Focus Group 2. Ombudsman's Office





access to banking services after interventions, they often lost it again due to restrictions imposed by the Security Service of Ukraine.

The role of lawyers from human rights organizations is extremely important. In cooperation with and supported by international organizations, they maintained direct contact with migrants and represented their cases in court. During interviews conducted in April-May 2025, lawyers with experience handling Belarusian cases remarked, “Ukraine has a complicated migration procedure for protecting human rights. Typically, Belarusians do not apply to migration authorities for refugee status, opting instead for temporary residence status. The Migration Service, however, is not prepared to extend stays or change the rules.”<sup>94</sup>

### Frameworks of Human Rights Organizations

**The scope within which non-governmental actors operate is quite limited because they are excluded from decision-making processes regarding policy implementation and have no direct influence on the creation of effective policies.** One respondent stated, “We do not have access to many internal documents and cannot influence processes that take place behind closed doors.” This exclusion significantly restricts their ability to contribute to effective policy implementation.

Although human rights organizations understand the causal link between restrictions on migrant legalization and migrants’ choice to engage in undeclared work, they are unable to change the situation. Additionally, these organizations do not collaborate with trade unions, which, based on prior analysis within Work Package 4, lack practical experience in defending migrant labor rights.

### Strategy of Human Rights Organizations

**The strategies of human rights organizations include a short-term goal of providing migrants with legal consultation and immediate support.** This includes assistance with court proceedings and free legal aid. Beyond this, **their strategy also encompasses long-term goals aimed at evolving migration policy and introducing a human-centered approach to asylum and temporary protection policies.** Specifically, representatives of human rights organizations participate in expert discussions on developing the State Migration Policy Strategy, where the protection of migrants’ rights in Ukraine is intended to be strengthened.

## 3.4. Interaction Between Key Actors

Under Ukrainian law, undeclared work is prohibited for both foreign nationals and Ukrainian citizens and is regulated by relevant legislation. These laws are promoted by various state agencies, including the State Migration Service and the Ministry of Internal Affairs. Sanctions for illegal employment include fines and other administrative penalties. **In practice, enforcement is often ineffective due to a lack of coordination and control between state**

<sup>94</sup> ZMINA. (2024, April 3). *Deportation and lack of state support: What awaits Belarusians fleeing the regime to Ukraine?*  
<https://zmina.ua/event/vydvorennya-ta-vidsutnist-derzhavnovi-dopomogy-shho-mozhe-ochikuvaty-bilorusiv-yaki-tikayu-t-vid-rezhimu-v-ukrayinu/>





**institutions. Migrants are typically the ones who suffer the most from this situation, as they can be subjected to forced expulsion.**

As one respondent noted, “*There’s an active checkpoint with Russia, Kalanchak, and there’s one between Belarus and Ukraine – I forgot the name. One is in Volyn Oblast, the other one is in Chernihiv Oblast. Of course, they don’t operate normally, but the gates are open, and everyone who needs to be forcibly returned is forcibly returned.*”<sup>95</sup>

Key national policies include Cabinet of Ministers resolutions aimed at improving the living and employment conditions for migrants. However, many of these measures remain on paper due to bureaucratic obstacles and the absence of clear implementation mechanisms. This has been most evident in the restrictions imposed on migrants’ bank accounts by law enforcement bodies and the National Bank of Ukraine (NBU).

**The lack of proper coordination between the State Migration Service and the NBU significantly hinders policy implementation.**

According to one respondent, “*There are many problems with accessing banking services. For example, migrants are not prohibited from registering as individual entrepreneurs. Even those with temporary residence permits can start small businesses in Ukraine. However, in practice, even if a bank opens an account for such activity, it is often blocked within two days.*”

When it comes to the registration of Belarusian migrants, the State Migration Service plays the leading role. In response to public calls for regulating the legal stay of Belarusian nationals – particularly those facing persecution in Belarus and whose passports or residence permits had expired – the Migration Service stated that there were no grounds to liberalize existing regulations or legislation.

Changes have only applied to Belarusian citizens fighting for Ukraine, who were offered an extension of their stay through legislative amendments. For other categories of Belarusian nationals, Migration Service officials argued that refusals to extend stay were due to the war and the absence of formal cooperation with Belarusian authorities.

Some human rights defenders explained the introduction of various restrictions and preventive security measures targeting Belarusian citizens this way: “*We are talking about civilians whose status has changed: they were previously considered 'neutral' but are now seen as a potential security threat. A negative status is automatically applied to them, along with all the accompanying restrictions.*”<sup>96</sup>

Human rights organizations often find allies in the Ukrainian Parliament and the Ombudsman’s Office. In 2020, a parliamentary group called “For a Democratic Belarus” was created to support opposition Belarusian parties and, by extension, those seeking protection in Ukraine.<sup>97</sup>

---

<sup>95</sup> Focus Group. Lawyer (2025)

<sup>96</sup> Focus Group. Human Rights Advocate. (2025)

<sup>97</sup> Today.ua. (2021, September 8). *Ukrainian MPs create an association “For Democratic Belarus in Ukraine”: Is everything fine with democracy now?*





This group has tried to advocate for legal reforms to improve the conditions for migrants, particularly by defending their rights, simplifying residence and work permit procedures, and ensuring social protection. One respondent explained: *“Since 2020, we’ve been assisting political refugees from Belarus – and historically, we’ve also supported political refugees from the Russian Federation.”*<sup>98</sup>

Civil society groups and some members of parliament are the ones raising policy discussions concerning undocumented migrants from Belarus. According to one respondent, the main opponents in this process are the State Migration Service and the National Bank, with backing from the Security Service of Ukraine (SBU). These actors often block or complicate efforts, reflecting a lack of political will for change. *“Our main opponent is the State Migration Service, and the National Bank due to the banking restrictions,”* the respondent said.<sup>99</sup>

Despite their efforts, civil society organizations have limited influence over policymaking. They frequently encounter bureaucratic hurdles and a general unwillingness among state institutions to cooperate. This undermines the policymaking process, leaving many important issues unresolved. As one respondent explained, *“We submitted formal requests, but they were denied. We believe that the instructions on resolving the banking account issues are not transparent.”*<sup>100</sup>

The respondent also pointed out that key stakeholders are often excluded from policymaking, limiting the potential for effective solutions. *“Unfortunately, the procedure is not transparent. The NBU resolution doesn’t clearly define the mechanism, so it’s unclear how decisions by the Security Service of Ukraine lead to account unblocking.”*<sup>101</sup>

The respondent’s conclusions highlight the need for more transparent procedures and greater involvement of civil society in policymaking. This would help ensure that all aspects are taken into account and that migrants’ rights are better protected.

The State Migration Service, the National Bank, and human rights organizations are at odds. When disputes take place, decisions are often made in favor of state bodies without properly considering the interests of migrants: *“When conflicts arise, they are usually resolved in favor of state institutions without considering migrants’ interests.”*<sup>102</sup>

Other factors that either help or hinder implementation include political instability, bureaucratic barriers, and the absence of transparent mechanisms. *“The political situation in the country often affects the ability to implement even the best initiatives,”* said another respondent.<sup>103</sup>

<https://today.ua/ukrayinska-u-verhovnij-radi-stvorily-ob-vednannya-za-demokratychnu-bilorus-v-ukrayini-z-demokratiyevu-vzhe-vse-garazd/>

<sup>98</sup> UA-WP5-23\_ human rights organization

<sup>99</sup> Consultation with activists (2025)

<sup>100</sup> UA-WP5-23\_ human rights organization

<sup>101</sup> Ibid.

<sup>102</sup> UA-WP4-19\_ lawyer

<sup>103</sup> Ibid.





## Conclusions

The case of Belarusian migrants poses a new challenge for Ukraine, as the country tries to balance its international obligations to protect asylum seekers with the need to ensure security during a time of war.

Belarusian citizens defying Lukashenko's authoritarian regime who arrived in Ukraine in 2020 found temporary protection in a culturally and linguistically affiliated country.

However, following the full-scale Russian invasion of Ukraine, the situation deteriorated. Belarus's support for Russia's aggression turned Belarusian citizens into political hostages, many of whom became undocumented migrants due to various structural obstacles and unregistered employment relationships. Many low-skilled Belarusian migrants sought income by selling agricultural goods in local markets.

Key factors that led to this situation include preventive screening measures imposed by the Security Service of Ukraine and the blocking of migrants' bank accounts. At the same time, the State Migration Service delayed the extension of temporary residence permits for those unable to return to Belarus due to their resistance.

Human rights organizations and the Ombudsman's Secretariat played a significant role in offering information and consultation-based support to migrants. However, their exclusion from decision-making limited the impact of their efforts.

The "Belarusian case" thus serves as a powerful example of the challenges faced by law enforcement institutions in upholding human rights during states of emergency – especially during wartime. In such circumstances, authorities tend to adopt preventive security measures that human rights advocates often view as excessive.

At the same time, this case highlights the importance of a strong civil society and a resilient human rights tradition capable of resisting the excessive control of law enforcement institutions.

This case underscores the need to revise and improve policies and measures for protecting human rights in times of war.





## ANNEXES

### Annex 1 – The types of interviewees and focus groups

Interviewee code	Type of organisation	Sector (general, food delivery, retail trade of agriculture goods)
UA-WP5-01	Trade union	General
UA-WP5-02	NGO	General
UA-WP5-03	Lawyer	General
UA-WP5-04	Lawyer / expert	General
UA-WP5-05	National worker	Food delivery
UA-WP5-06	International employment agency	General
UA-WP5-07	International employment agency	General
UA-WP5-08	Employer organization	General
UA-WP5-09	International employment agency	General
UA-WP5-10	Labour migrant	Retail trade of agriculture goods
UA-WP5-11	Employer organization	General
UA-WP5-12	Government authority	General
UA-WP5-13	Government authority	General
UA-WP5-14	Labour migrant	Retail trade of agriculture goods
UA-WP5-15	Labour migrant	Food delivery
UA-WP5-16	Labour migrant	Food delivery
UA-WP5-17	Labour migrant	Retail trade of agriculture goods
UA-WP5-18	Labour migrant	Food delivery
UA-WP5-19	Labour migrant	Retail trade of agriculture goods
UA-WP5-20	Labour migrant	Food delivery
UA-WP5-21	Labour migrant	Retail trade of agriculture goods
UA-WP5-22	Labour migrant	Retail trade of agriculture goods
UA-WP5-23	NGO	General
	Expert focus group 1	Food delivery
	Expert focus group 2	Retail trade of agriculture goods





## Annex 2. Employment conditions for couriers: an overview of key market players

### Aggregator platforms

Glovo uses a model of cooperation through a public offer in the application and considers couriers as self-employed performers or FOPs. Employment contracts are not concluded, and therefore standard labor law guarantees do not apply. After 2019–2021, the company has been more actively encouraging the registration of FOPs, including information campaigns and temporary tax incentives. Despite this, formalization as a FOP does not change the basic lack of paid leave, sick leave, and protection against unilateral termination of cooperation. In practice, there is rental and transfer of accounts, work through intermediaries with deductions of a share of income, as well as arbitrary blocking of accounts. The company's insurance programs are declared, but couriers' complaints include complicated procedures for receiving payments and small amounts of compensation.

Bolt Food uses a legal structure similar to Glovo, positioning couriers as self-employed partners. Complaints from couriers relate to income instability due to variable rates and bonuses, opaque algorithmic order distribution, and account blocking. Couriers often combine work on two platforms to eliminate downtime and reduce dependence on the terms of one company.

### Retail and own delivery

Zakaz.ua operates outside the classic platform model and hires staff directly. Depending on the role and location, order pickers and couriers are hired as full-time employees or under civil law contracts, with fixed schedules, rates, and corporate safety standards. This organization provides more predictable conditions and internal procedures that differ from the “app users” model.

Nova Poshta engages couriers within the corporate delivery service, usually with official registration in the company or branches. The practices are based on internal standards, where labor or civil contracts are concluded without intermediary accounts and without a public offer, and requirements for safety, schedules and liability are recorded in the employer's documents.

Silpo, Fozzyshop and Fora use a mixed approach. In Silpo, along with classic direct hiring, there are partner formats for cooperation with couriers, which brings individual routes closer to the self-employment model. Fozzyshop and Fora more often use a traditional retail approach with direct processing in logistics departments. The result is greater predictability of schedules, the possibility of hourly or combined payment and formalized occupational health and safety procedures.

Tarantino Family operates its own delivery within its restaurant network, usually directly hiring couriers for the company's transport. The payment is combined and includes an hourly





component along with payment per order, which refers to the model as a classic employer, rather than an aggregator platform.

### **Aggregators-mediators**

Mister.Am works as a local aggregator with flexible schedules and piecework pay. Registration usually takes place through individual entrepreneurs or civil law contracts with local partners. This is not a mass platform with a deep algorithmic infrastructure, but it is not a classic retail staff; by legal nature, the relationships tend to be civil law, not labor.

### **Historical player**

Rocket operated on the market from 2018 to 2022 and ceased operations in Ukraine in the spring of 2022. Currently, it does not influence the formation of courier employment practices, but historically it has demonstrated similar approaches to attracting performers to other platforms.

### **"Virtual restaurants"**

Establishments without halls serve customers exclusively through delivery and rely either on the platforms' courier networks or on their own logistics units. The working conditions of couriers in this category reflect the chosen model: in the case of transferring orders to platforms, the self-employment/FOP regime without employment guarantees applies, and in the case of their own delivery, standard employment or civil contracts with the employer operate.

### **Conclusion**

Aggregator platforms such as Glovo and Bolt Food in Ukraine use self-employment and sole proprietorship structures combined with algorithmic management and the possibility of unilateral changes to rules, which creates dependency without providing full labor protection. Retail and chains with their own delivery more often register couriers directly or under civil law agreements, with more predictable schedules, documented security procedures, and clear channels of responsibility. Local aggregators-intermediaries occupy an intermediate niche, gravitating towards civil law relations without massive algorithmic management. It is worth noting separately the spread of intermediation and transfer of accounts in the platform segment, which increases risks for employees and blurs the boundaries of responsibility of the parties. The choice of delivery model determines not only the economics of the service, but also the architecture of rights and guarantees for couriers.





## Deliverable information

Schedule Information	
<b>Title and number</b>	<b>Precarious Work and Legal Ambiguity Affecting Labour Migrants in Ukraine</b>
<b>Work Package, Task and Deliverable</b>	WP5, Task 4.2, Part of D3.2 (DignityFIRM Working paper series). Internal National Report – UKRAINE
<b>Publication date</b>	31.03.2026
<b>Doi reference</b>	10.5281/zenodo.19114247
<b>Author(s)</b>	Yevheniia Hryhorieva, Iryna Sushko    Layout and design: Olha Kovalenko
<b>Dissemination level</b>	PU
<b>Deliverable type</b>	Working Paper



WP5 Working Paper

# Precarious Work and Legal Ambiguity Affecting Labour Migrants in Ukraine

## **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.

**[www.dignityfirm.eu](http://www.dignityfirm.eu)**



This project has been funded by the European Union's Horizon 2020 research and innovation programme under grant agreement No 101094652