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Platform work, exploitation, and migrant worker resistance: Evidence from Berlin and London

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Abstract

For migrant workers who do not have access to other means of income, the platform economy offers a viable yet exploitative alternative to the conventional labour market. Migrant workers are used as a source of cheap labour by platforms – and yet, they are not disempowered. They are at the heart of a growing platform worker movement. Across different international contexts, migrants have played a key role in leading strikes and other forms of collective action. This article traces the struggles of migrant platform workers in Berlin and London to explore how working conditions, work experiences, and strategies for collective action are shaped at the intersection of multiple precarities along lines of employment and migration status. Combining data collected through research by the Fairwork project with participant observation and ethnography, the article argues that migrant workers are more than an exploitable resource: they are harbingers of change.

Keywords: decent work; labour relations; labour rights; low-paid workers; migrant workers; migration; precarious work; sociology of work; trade unions platform economy

JEL Codes: J46; J52; J53; J61

Introduction

In high-income countries of the capitalist core, platform work, a term used to identify the type of labour that is mediated through digital labour platforms and often encompasses casual and temporary work known as 'gigs', is disproportionately migrant work (van Doorn et al 2023; Woodcock and Graham 2002). Migrants often work in the platform economy because of a broad range of overlapping factors: the structural racism and xenophobia embedded in the conventional labour market; a lack of knowledge of local languages, legal structures and/or social networks; the negative coercion of anti-migration legislation; and so on. Migrant populations who rely on the platform economy for income may experience the benefits of its much-advertised flexibility, but this flexibility comes at a cost (Cano et al 2021; Heeks et al 2021). Platform work, which may or may not come with an employment contract, is often characterised by low pay, poor occupational health and safety, exclusion from basic social security provisions, and a general precarity induced by a lack of applied or enforced labour market regulations (Fairwork 2021, 2021/22). For migrants who may not have access to other means of income, platforms offer a viable, yet exploitative alternative to the mainstream of the labour market.

Since 2016, we have witnessed a rising tide of workers contesting the working conditions in the platform economy. Many of the groups, associations, and unions leading these disputes were either founded by migrant workers or are supported by them. Rather than take exploitation as a given at a time of pandemic-induced economic instability, they have organised to resist unfairness. Over the course of almost seven years, and in particular, in the past two years, the evidence of this resistance has become more abundant as workers employ a range of tactics, from (wildcat)strikes to protests, legal cases, and worker council elections, to push back against exploitation (Bessa et al 2022). These examples, some of which this paper will elucidate, contradict widespread initial expectations that platform workers are unable to organise when confronted with platformisation and 'algorithmic management' (Lee et al 2015). Rather, migrant-led worker resistance has proven to be successful in contesting precarity and contributing to positive change in the platform economy. This does not mean that there are not failures. Many of the initiatives that have flourished across the world have faced important legal and organisational challenges. One such challenge, as the paper explains in greater detail, was lack of institutional representation from existing unions. The examples we provide, however, underline the ways that workers have achieved their goals amidst a union landscape where some of the major traditional labour unions in Germany and the United Kingdom (UK) have only recently started to pay attention to the platform workers' plight.

This article uses two case studies from Berlin and London to ask two fundamental questions: first, how the specific patterns of migration, the particular composition of state border regimes, national systems of industrial relations, and urban labour markets determine the conditions that platform workers experience; and second, how these factors both impede and enable the forms of worker resistance which emerge in these major urban contexts. In doing so, the article offers a comparative account of how worker resistance emerges amongst social and workplace networks with large migrant memberships in significantly divergent conditions and allows us to evaluate transnational constants against specific features of resistance generated by urban and national contexts. Whilst previous accounts have focused on how workers from different countries have attempted to organise across borders (Cant and Mogno 2020) or compared general patterns of resistance across national contexts (Tassinari and Maccarrone 2020), close empirical comparisons of how specific factors such as migration patterns, border regimes and national labour regulation, and markets structure resistance are lacking. This article aims to fill this gap on the basis of extensive empirical engagement conducted through the Fairwork project (Graham and Woodcock 2018). In particular, given the delayed response of governments and trade unions to the emergence of the platform economy and the particular challenges it poses, we aim to pay particular attention to the grassroots movements that have demonstrated how migrant labour responds and resists.

Methodology and case studies: Platform labour markets and migration regimes in Germany and the United Kingdom

This paper is part of a larger study on the platform economy and labour conditions currently conducted in 38 countries across five continents.[1] For the purposes of our research in Germany and the UK in 2021 and 2022, we have conducted over 200 in-depth interviews with platform workers across 14 platforms in ride hailing, food and grocery, and domestic services sectors (Fairwork 2021, 2021/22). In addition, consultations were undertaken with platform management as well as representatives of trade unions and of grassroots worker collectives. Data from this project are complemented with ethnographic research among food and grocery delivery workers in Berlin conducted by Alyanak during 2021 and 2022 and ethnographic data from two previous research projects on the

organising strategies of food delivery workers in London and Brighton, which were conducted by Badger and Cant between 2017 and 2019 (Badger 2022; Cant 2019).

An essential precondition: migrant labour in platform work

Without migrant workers, the platform economy would not exist in its current form. They offer a cheap, and readily accessible pool of exploitable and discardable labour-power, which is on hand and available for work in all the major cities of the capitalist core. Yet, scholarship on digital labour platforms has only just begun to focus on the gig-work-migration nexus (Altenried 2021; van Doorn and Vijay 2021; van Doorn et al 2023). Whereas previous studies have noted migration as one of several factors shaping the unique composition of the platform economy, it is now being understood as a primary object of study. Research has illustrated how particular platforms (re-)produce racialised patterns of precariousness by exploiting migrant workers' vulnerable positions in host countries (Barratt et al 2020); focusing on residency status and differential access to the labour market (Mezzadra and Neilson 2013); and having (or lacking) European Union (EU) citizenship (Schaupp 2022). However, despite migration being an oft-mentioned factor in discussions of worker resistance, dedicated empirical work on this question has been largely lacking up until this point.

This paper begins to close that gap by presenting a detailed account of both how migrant labour has been shaped over the course of decades by particular border regimes and labour market conditions facilitated by nation states and how these factors ignite processes of resistance that result from the experience of migrant labour in urban environments. This shaping occurs both in facilitating and prohibitive ways. That is to say, the specific nature of national migration experiences closes down some opportunities (e.g. through restrictive visa regimes or the threat of deportation/state violence) whilst opening others (e.g. prompting the creation of networks/migrant worker enclaves to ensure collective resilience.) Against this background, the question of to what degree platform workers' migrant status either catalyses or inhibits collective worker organisation and resistance to platforms' exploitative practices demands further attention. Literature on migrant workers' collective agency in other sectors, such as construction or agriculture, has shown that the experience of multiple precarities experienced both in the labour market and society more broadly can serve as a catalyst for collective worker action, e.g., in the form of wildcat strikes or spontaneous labour protests (Berntsen 2016; Orth 2022). On the other hand, studies have pointed at the challenges that established trade unions or community activists face when trying to organise migrant workers due to language barriers, workers' fear of losing their jobs, their lack of knowledge of national industrial relations frameworks or simply a lack of interest, where migrant workers may not consider their work in host countries as long-term arrangements (Alyanak and Karlıdağ 2022; Fuchs et al 2022).

In the following pages, we trace struggles of migrant workers across several platforms in Berlin and London to explore how working conditions, work experiences, and strategies for collective action are shaped at the intersection of multiple precarities along lines of employment and migration status and linked differential accesses to the labour market as well as to social protections and labour rights. Before we dive into the case studies, we first need to provide a snapshot of the union landscape in Germany and the UK and ask where traditional unions stand vis-à-vis migrant labour, and in particular, the platform workers.

An overview of the union landscape in Germany and the United Kingdom

In much of the Western world, traditional labour unions are facing various challenges. On the one hand, they are losing membership amongst their traditional constituencies, and on

the other, they have not adapted their organisational structures to recruit and organise precarious, and especially migrant workers (Connolly et al 2014; Marino 2012). Against this background, most labour unions have launched initiatives to diversify their union structures and membership including concerted diversity policies or offering information material in various languages (Martínez-Lucio and Perret 2009). However, these measures alone do not suffice to build a strong membership base among migrant communities (Martínez-Lucio and Connolly 2012). As the Germany and UK cases underline, unions have only recently started to pay attention to sectors such as platform work which rely heavily on migrant labour.

Instead, what we have witnessed over the past three decades, and continue to do so to this day, is migrant workers self-organising through community-based solidarity networks (Milkman and Ott 2014; Roca and Martín-Díaz 2017, 2020). In contrast to the bureaucratic nature of traditional trade unions, migrant worker networks and organisations are often grassroots driven and focus on litigation and advocacy strategies to address a broader array of issues ranging from labour rights to other social issues such as housing, health, or social protection of migrant workers. One example comes from Roca et al.'s study (2017), where the authors depict the ways through which Spanish migrant workers in Berlin have gathered in early 2010s under the umbrella of the Union Action Group, 'Maroon Tide' (named after the colour of the Spanish passport), following the mass emigration of Spanish youth after the economic crisis of 2008. The relationship between Maroon Tide and the traditional service sector trade union Ver.di in Germany, as the authors explain, have remained more informal and relied to a large extent on the individual attempts to cooperate from Ver.di officials rather than official institutional support. In the UK, in contrast, traditional unions have been more active in forging collaborations with migrant-led community organisations for specific struggles, drawing on community networks as an important resource. One example described by Connolly et al (2014) is the Living Wage campaign in London launched in 2001 by London Citizens, which united trade unions, community organisations, and voluntary groups and which brought about a living wage agreement for jobs at the Olympic games in London (see also Wills 2004).

We now turn to the specifics of Germany and the UK to take a closer look at where unions in both countries stand vis-à-vis platform workers and offer insights as to why they initially remained distanced to flourishing grassroot activism.

Germany

In Germany, works councils constitute the first legal step towards worker organising. Upon forming a works council, workers can seek collective representation through a union, which, in turn, allows collective bargaining and action. However, the relationship between works councils and labour unions remains complex especially when it comes to platform work. For one, there is no unified approach amongst the unions affiliated with the German Federation of Trade Unions (DGB) towards organising platform delivery workers. Whereas food delivery platforms such as Wolt and Lieferando fall under the purview of the union 'Nahrungsmittel Genuss Gastsätten' (NGG) which has traditionally organised restaurant workers, riders working for grocery delivery platforms such as Gorillas, Flink, or Getir fall under the scope of the union Ve.rdi, which traditionally organised the retail sector, including the supermarket chain REWE, which owns the app-based delivery service Flink (Nikolovic and Ullbrich 2021). In the last few years, we have seen Ver.di and NGG seek to engage with delivery workers, yet this process also highlighted certain reservations from the side of both platform workers and unions. In their relations with Gorillas, where worker activism has been led predominantly by migrant workers in Berlin, Ver.di has been confronted with reservations from workers who feared losing their autonomy if they chose to affiliate with the union. In reaction, Ver.di has adapted their organising practices

and has taken several measures to enhance trust with the workers and lay the grounds for a collaboration. For example, its organisers have started to use digital messengers with built in translation and voting tools, adapting communication to their grassroots organising culture. Nevertheless, additional tensions were visible due to contrasting strategies – mainly across Ver.di's long term oriented collective bargaining strategy and Gorillas workers' aspirations to find quick solutions (e.g. wildcat strikes) for urgent problems. These clashing institutional logics, the high worker turnover, and the lack of a uniform decision within the Gorillas Workers Council to organise under Ver.di continue to pose barriers for an integration of the grassroots built collective organisation into the institutionalised framework of Ver.di and to transform a more immediate 'fire-fighting' strategy into a more proactive collective bargaining approach. Ver.di also does not have a concerted and unified position towards organising delivery workers. Whereas some of its officials see platform work as an important sector – mainly due to the broad public attention that Gorillas workers' protests have been getting – others advocate for concentrating the union's resources on other sectors within the digital economy (e.g. e-commerce), where Ver.di has had more success in building a membership so far.

The NGG, in contrast, has made continued efforts to work with Lieferando riders and has been actively involved in supporting works council formations in several cities, including Dresden and Leipzig, where new Lieferando works councils were founded in November 2022 and March 2023, respectively. Compared to Gorillas workers, however, early organising in Lieferando has been driven by riders from Germany who were NGG members and familiar with German regulations and bureaucratic procedures. Building on the presence of core groups of union rider activists in several cities, the NGG and affiliated riders have continued to push for the signing of a collective bargaining agreement between the NGG and Lieferando which should establish, among other demands, a basic pay rate of 15 Euros per hour. To this end, in later stages of the campaign, the NGG has produced leaflets and information material in various languages, including Arabic and Hindi, which are being distributed by union rider activists in various cities. In April 2023, NGG and Lieferando rider activists together have organised the first official strike of riders in Germany, which was joined by about 100 riders (Merkur 2023). While riders were able to significantly disrupt the company's operations on that day in Frankfurt, the disruptions were not powerful enough to force Lieferando to the negotiation table. NGG and Lieferando riders are therefore planning to conduct follow-up strikes in other cities.

United Kingdom

In the UK, too, the relationship between platform workers and unions is a complicated one. Union penetration in the British labour market has seen a steady decline since Margaret Thatcher's time as Prime Minister, which was notorious for a heavy-handed approach toward unions and labour activism. However, recent years have seen a resurgence in union activity and membership, particularly in sectors typified by precarity and insecurity (unlike Germany, the UK has very little manufacturing, so traditional union bases are left weak).

As we discuss in this paper, what has been most inspiring has been the vibrancy with which marginalised workers have engaged direct action in the fight for improved working conditions. In the earliest cases, this was wildcat action (e.g., the 2016 strike against Deliveroo) and came about without organisational support from trade unions. However, soon after the action began, the IWGB, which is an independent worker-led union, stepped-in to support and have had a strong courier branch ever since (in addition to a private hire/ride-hail branch, among others).[2] Other, larger unions are also involved in this space, such as the GMB who now have voluntary recognition agreements in place with Uber and Deliveroo. Whilst promising, some workers in interviews with Fairwork have expressed

sentiments that they do not feel represented by large unions such as GMB, citing a union bureaucracy dislocated from the rank-and-file base; and an unwillingness to negotiate on, among other things, pay.

In sum, the union landscape vis-à-vis couriers is a complex one, but positive signs are emerging. Traditional couriers (i.e. those working without platforms to organise their labour) have been historically difficult to organise, with few exceptions such as the IWGB's support of CitySprint couriers in London. This has comprised the synthesis of strike action and legal action to bring about change. However, this is the exception rather than the norm. Non-London UK cities have not traditionally lent themselves to bike courier work (their lack of density and small business districts have not supported this type of work on a large scale as has been the case in London, New York, and other capitals before the rise of the platform economy) As such, couriers in the UK are starting from a base of very little unionisation, rather than strong industry unions already in place. Base unions with branch structures are responding to the nature of the work as it currently stands, able to match platform agility in refashioning their approach. More traditional unions are able to deploy their vast resources to focus on the platform economy. As yet, the future is uncertain, but the next few years will be both interesting and decisive in establishing the nature of labour relations between platform workers, unions, and companies for years to come.

Migration regime and precarity in platform work

Berlin

Germany's labour regime has long relied on the cheap labour provided by migrant workers with differential access to the labour market and restricted rights. Starting with the *Gastarbeiter* (guest worker) programme of the 1950s, the country has brought in temporary labour to compensate for ongoing labour shortages. The Gastarbeiters of the late 1950s, who arrived primarily from Italy, Spain, Portugal, Greece, former Yugoslavia, and Turkey (to West Germany) and the Eastern bloc and Vietnam (to East Germany), worked primarily in automotive manufacturing, construction, forestry, meat production/packaging, and infrastructural projects (Berger 1975 cited in Berger and Mohr 2010; Castles 1985). While the programme ceased to exist as of 1973, migrant workers continue to arrive through family unification (especially during the latter half of the 20th century), work and holiday visas (primarily from Uruguay and Argentina), and student visas from India, Pakistan, Bangladesh, North African and South American countries, and others (Ellermann 2015; Krannich and Hunger 2022; Morris 2000). This new workforce, though young and able-bodied like the Gastarbeiters, is also highly educated. Many come to Germany with bachelor's and master's degrees in hand and either enrol in universities to continue their studies or seek job opportunities that utilise their degree (Khadria 2001; Kogan 2011). While German immigration law includes initiatives to attract highly skilled labour (such as offering shortcuts towards residency for high skilled workers, see Bauer and Kunze 2004), many migrant workers, during their studies or after graduating, face challenges in entering the labour market. Even in cities with a high density of migrants, lacking German language skills, or know-how regarding bureaucratic and legal frameworks (for seeking jobs, applying to higher education institutions, filing taxes, appealing to unfair or illegal practices) serves as an impediment to migrant workers pursuing non-menial jobs, including, start-up and IT jobs. For this reason, upon arrival or after graduation, a growing number of migrant workers seek employment in the platform labour market, which is flourishing in the country's large metropolises (BMAS 2018; Bocksch 2020).

One such metropolis, Berlin, has witnessed an influx of migrants over recent years in light of global geopolitical events and conflicts, such as the war in Syria, the COVID-19 pandemic, and most recently, the war in Ukraine. Between 2015 and 2022, the percentage

of residents without a German passport has risen from roughly 15% to over 20% (Statistisches Bundesamt 2022). Due to its multicultural and highly diverse population, the city has become an attractive destination for young and educated migrants coming in on student or temporary work and holiday visas. Not surprisingly, these migrants also form the backbone of the rapidly growing platform economy in Germany, which, since 2021, has included many new companies emerging, especially in the food and grocery delivery sector.[3]

In reference to the intersections of precarity and platform work, the German platform labour market is highly stratified and differentiated. On the one hand, almost all food and grocery delivery platforms in Germany provide their workers with employment contracts. These workers, as a result of having an employment contract, enjoy a comparatively high level of benefits and protections, such as the right to minimum wage, sick pay, annual and parental leave, as well as health and accident insurance.[4] Nonetheless, work on food and grocery delivery platforms remains especially precarious for migrant workers in other ways. The wide use of short-term contracts of only one-year duration combined with a six-month probation period allows platforms to flexibly dispose of workers in case of falling demand, or to get rid of unruly workers who engage in protests or activism. This becomes particularly problematic for migrant workers who may need to prove employment to extend their residency in Germany, let alone have the money to sustain their stay in the country.[5] The probation period also remains an obstacle to worker organising – with workers within their first six months of work fearing managerial repercussions such as not being assigned the hours they request, being reshuffled around warehouses, or having their contract terminated without due diligence. Moreover, workers complain about frequent delays or irregularities in the payment process, the lack of adequate working equipment, heavy backpacks and dangerous conditions on the road exacerbated by time pressure (e.g. making deliveries in 15 minutes). Since most platforms are not transparent in explaining to workers their rights (something as basic as the right to sick leave), migrant workers who may not be familiar with social security schemes often have to rely on each other (via worker-managed Whatsapp and Telegram groups), or in more recent instances, workshops held by labour unions which explain, in English, contractual rights and benefits, and channels to seek appeals.[6]

Compared to food and grocery delivery platforms, the level of precarity in domestic work is considerably higher, where workers labour under a self-employed model and therefore lack social protection and a secure income. High commissions to platforms[7] and unpaid labour time such as commuting between households that many workers in the domestic services sector face, lead workers to earn below the German minimum wage, which is currently at EUR 12 an hour. Additionally, many platforms in these sectors fail to respond to issues workers may face at work, such as non-payment (by the customer, in case where payments are not mediated by the platform), unpaid working time, work accidents, or discriminatory and sexually predatory behaviour. In such instances, most platform workers interviewed indicated a lack of response by platform management. When a response was extended, it often came in the form of an advice to seek legal recourse (without offering any financial support). However, seeking legal recourse is not only an expensive option (unless it is offered pro-bono) but also one that is overtly bureaucratised, time consuming, and complex. Workers who seek this option (which, in our sample, only came from workers in the food and grocery delivery sector, and never the domestic work and care sector) often must wait for months before the court reaches a decision – and in the case of migrant workers, this period may well exceed their stay in Germany. Hence, workers freelancing domestic services platforms seek advice through worker-led social media networks. One example is that of a Whatsapp channel founded by South American Helpling/domestic cleaners called *Syndicato* [Union], where workers used the channel to share know-how, and to warn each other of predatory customers. As a

majority of these workers came from Spanish-speaking countries, the discussion (as the name of the channel, also indicates) was primarily in Spanish.

London

The roots of British migration regime extend further back than the Gastarbeiter system, to the 1905 Aliens Act. The law was the first to restrict immigration to Britain and was catalysed by a racist panic amongst British social and political elites over 'undesirable' immigration, particularly the immigration of Eastern European Jews fleeing Tsarist pogroms (Garrard 1971). Influenced both by the development of anti-migration legislation in the US and across the British Empire, this act established the groundwork for a border regime based on hostility to racialised others which has been maintained to the current day (Bashford and Gilchrist 2012). Ever since, British migration policy has been defined by the tension between the systematic necessity facing the more geographically immobile sectors of British capital to exploit reserves of cheap labour power and the nativist racism and legislative discrimination directed at the workers that fulfil this need. The 'inability to expel' that Wallerstein argued produces the specifically capitalist form of racism is strongly evident in all parts of the British border regime (Balibar and Wallerstein 2011, p. 33).

Despite the 1905 Act's initial, largely ineffective, attempts at restriction, the continued freedom of movement afforded to subjects of the empire allowed for repeated cycles of immigration in response to conditions in the British labour market, including the symbolic post-war Windrush generation. By 2004, just over five million migrants lived in the UK. This increased to over nine million in 2016, where the number has since generally stabilised. Foreign-born migrants to the UK are drawn from a wide range of countries, reflecting in part the global span of British imperialism, but particularly from India, Poland, Pakistan, and the Republic of Ireland. Work is the clear primary motivation of migrants to the UK born in the EU (48%) but is only the secondary motivation of those born outside the EU (23%) with the primary motivation being family (46%) (Fernández-Reino and Rienzo 2019). In addition to these regularised migration flows, additional irregular migration is a significant factor with estimates suggesting there were 618,000 migrants in the UK in 2009 (Gordon et al 2009), when the total number of regular foreign-born migrants was around seven million. If irregular migration has followed an isomorphic pattern to regular migration, then we would expect the number to have increased since then, but this assumption is unproven. In terms of geographical distribution, 35% of the UK's migrant population is located in London, where 37% of the total population are migrants, far higher than any other region (Rienzo and Vargas-Silva 2022).

Migrants are central to the UK labour market, with the 5.9 million foreign-born migrants employed in the UK in the 3rd quarter 2021 making up 18.1% of UK employment. Migrant workers are particularly concentrated in employment in the hospitality (28%) and transport and storage (26%) sectors where they are disproportionately over-represented (Fernández-Reino and Rienzo 2019). However, the significance of migrant workers to the platform economy in London and Britain more generally is not captured by these figures – because unlike in Berlin, the vast majority of these workers are not granted employment status.

London's platform economy has grown rapidly over the past decade, as the concentrated wealth of the city and lax British labour market regulation has combined to create the perfect conditions for platform labour's expansion. In 2018, 24% of the UK's platform workers were concentrated in the city (Lepanjuuri et al 2018). Home-grown platforms like Deliveroo have absorbed huge volumes of investment to fuel their rapid growth, but they have done so whilst circumnavigating the established modes of labour regulation connected to employment status. Fairwork's 2022 UK research

studied fourteen platforms, ranging from grocery delivery platforms like Getir and Gorillas, ride-hailing platforms like Uber, Bolt, and Ola, care platforms like Helpling and Yoopies, courier platforms like Stuart and Pedal Me, general task platforms like Task Rabbit, and food delivery platforms like Uber Eats, Just Eat and Deliveroo. We lack data on what exact proportion of workers in the British platform economy are migrants,[8] but of the 87 workers interviewed in this study, a significant majority were migrant workers.

Whilst some workers in the sector, such as those working for grocery delivery and ride-hailing apps, are given worker and employee status, many more remain classified as self-employed independent contractors. Migrant workers in these circumstances experience a form of precarity associated with a lack of statutory rights such as sick pay, holiday pay, maternity pay, and other essential labour protections. However, some migrants also experience an additional layer of precarity as a result of the operationalisation of the UK's border regime.

All employers in the UK have a responsibility to conduct 'right to work' checks to ensure workers have the legal right to work in the UK prior to employment, following 2006 immigration legislation introduced by Tony Blair's New Labour government. This was a clear precursor to the 'hostile environment' policy introduced by the Conservative government via the 2016 Immigration Act, which created a specific offence for people who work in the UK despite knowing, or having reasonable cause to know, they do not have the right to do so. However, despite the legal requirement only applying to employers, it is often voluntarily implemented by platforms that do not offer workers employment status. However, this does not prevent irregular migrants for working for these platforms.

The right to substitute became a central tenet of Deliveroo's case against worker status in the UK high court. In short, their (successful) argument was that because workers had the contractual ability to subcontract their work to others, they cannot be legally classified as having 'worker' status (a legal category that falls between self-employment and full employment.) This right to substitute allows workers to 'rent' their account to other workers. When an account is substituted, the choice of whether a right to work check should be conducted voluntarily is devolved onto the person renting their account. In some cases, platforms encourage them to do so — but this encouragement appears largely unenforced. As a result, many people renting accounts do not conduct a check. This allows irregular migrants, who otherwise lack access to the labour market due to hostile environment policies to gain access to paid work. Ethnographic studies suggest that this practice is relatively widespread (Badger 2022; Cant 2019), although sampling difficulties make it very difficult to get a quantitative understanding of the phenomenon. Irregular migrants who cannot access other parts of the labour market due to right to work checks are particularly reliant on the wages earned from platform work because they have very few other options in the labour market.

The border regime converts this reliance into a particular form of precarity. In line with Anderson's (2010, p. 312) argument that immigration controls should be thought of 'as a mould constructing certain types of workers through the selection of legal entrants, the requiring and enforcing of certain types of employment relations, and the creation of institutionalised uncertainty,' the hostile environment produces irregular migrants as a workforce which are particularly vulnerable to the state's potential to exert violent force through immigration raids, document checks, and indefinite detention. This threat is generally an abstract one. The 'Stalker Paradox' holds that even as the strictness of national border regimes escalates, so does the number of regular and irregular migrants (Stalker 2000; Terray 2008). In 2018, UK immigration enforcement arrested approximately 5,000 people – probably less than half a percent of the total number of irregular migrants in the UK (Corporate Watch 2018). Nonetheless, the potential vulnerability of irregular migrants leads to forms of political non-participation and the acceptance of what might

otherwise be unacceptable conditions in society and the workplace (Khosravi 2010). Abstract threats are effective, despite their abstraction.

This precarity is central to the process of 'offshoring in situ' [*délocalisation sur place*] (Terray 1999), in which urban service industries that cannot access cheap labour through the offshoring of production achieve savings in the cost of labour power by either directly hiring or facilitating the subcontracting of work to, irregular migrants. The status of these workers as under threat from the border regime of the host country lowers their bargaining power and can force them to accept sub-minimum wages. However, this process also has a flipside that can lead to increased worker mobilisation. Because their choice of how to navigate the labour market is so restricted, irregular platform workers do not have the choice to change jobs in the same way other workers do. Instead of pursuing individualised resistance by quitting the job in disgust (Mulholland 2004), one of the only options left on the table is taking collective forms of action to improve wages.

Contesting precarity? Collective agency and the strategies of migrant workers

So far, our discussion has focused on the relationship between migrant workers and platforms and underlined ways in which the platform economy builds on the deep roots of national border regimes to exploit migrant workers in both Germany and the UK. We have shown how migrant workers are either deprived of employment rights through classification as independent contractors or kept in the dark about those rights and mechanisms to enforce them (through collective representation and action in particular) by the very platforms that employ them. Moreover, we have highlighted some of the reasons why workers revert to grassroot organising, one such being the lack of a clear interest (and a unified policy) by the trade unions to represent platform workers.

The following pages offer insights from the nascent but growing activism amongst platform workers in Germany and the UK and show how workers in general, and migrant workers in particular, contribute to the struggle against precarity in two of the major European hubs of platform work: Berlin and London.

Important to note is that not all worker activism has employment contracts and benefits as its primary aim. In Spain, for example, the *Ley Rider* [Rider Law] which grants employment rights for delivery workers has been supported by the two big unions, the UGT and the CCOO, operating in the country. Yet, various grassroot delivery worker associations (the 'pro-autonomos'), including the Asociación Autónoma Riders an Repartidores Unidoos, contested the design of the Rider Law and publicly protested its implementation. These associations have argued that any legislation that would force platforms to give workers employment contracts would lead to a deterioration of working conditions for riders, and when forced to employ workers, platforms would opt to use third party contractors for deliveries which would have worse conditions and that workers would in addition lose the flexibility to work whenever they want (AAR 2020). Within the Spanish parliament, this position was also defended, among others, by the Spanish far-right and ultra-conservative party Vox, which had voted and mobilised against the implementation of the ley rider.

Moreover, workers can be divided across ideological lines – seeking, in certain cases, political parties that pursue anti-labour campaigns. Some rider organisations, such as the 'Anti-fascist riders' (Entregadores Anti-Fascistas) in Brazil saw their organising efforts and collective action as part of a broader political struggle against the far-right government of President Jair Bolsonaro, which had been cutting worker and union rights in various areas through labour reforms. However, many riders also openly supported Bolsonaro's government, especially for their promises to take a harder stance against violent and organised crime. In a survey with 253 riders from Brazil in July 2020, 17% of riders declared

to be in favour of Bolsonaro's government, while 39.5% declared to be against (Camargo 2022). Pro-Bolsonaro rider groups have organised rallies in support of Bolsonaro in various cities during the period leading up to the presidential election in Brazil in October 2022 (Phillips 2021).

These two cases, from Spain and Brazil, are an important reminder that whilst grassroot worker movements seek a fairer platform economy, workers may contest the paths towards attaining that goal. As the following discussion on the relationship between worker groups and unions make it clear, in Berlin and London, too, worker organising followed a path that was fraught with many battles which were complicated by the countries' respective union landscapes.

Berlin

Worker activism among food couriers in Germany dates to 2017, when hundreds of Foodora and Deliveroo riders took to the streets to demand higher wages and better working conditions. In the case of Deliveroo riders, the demands also included employment contracts, which the workers were not granted as they were employed on a freelance basis. Having an employment contract mattered for it provided workers with greater social security, as well as rights to collective representation.[9] Moreover, for certain migrants on work and holiday visas, such as the citizens of Argentina, self-employment/freelancing was not accepted by the German state as a form of valid employment to retain residency.

Worker activism, which continued in consecutive years, was integral to efforts towards setting works councils at Foodora in Cologne in Summer 2017 and Deliveroo in January 2018.[10] While several unions assisted the workers, the bulk of mobilising came through the use of social media, and in particular, a Facebook group called *Liefern am Limit* [Delivery at the Limit], which to this day (now under the aegis of the NGG) continues to mobilise food delivery riders in Germany.[11]

Neither of these platforms operate in Germany as of 2022. Foodora, which was operational in Germany since 2014, was taken over by the Netherlands-based JustEat Takeway (operating in Germany under the name of Lieferando) in December 2018. The takeover enabled the newly formed works council to survive, but establishing new ones proved to be a challenge under the new management. Deliveroo, on the other hand, left the market in 2019, with much of its courier workforce also joining Lieferando (Sullivan 2019).

During 2020, the pandemic, however, encouraged new platforms to enter the food and grocery delivery sector[12] and hire thousands of couriers to meet the growing demand for home deliveries (Altenried et al 2020; Ustek-Spilda et al 2020). Many migrants, who may not have had the necessary German proficiency to seek other jobs and needed a steady income to pay for accommodation and sustenance, found jobs primarily through these platforms as most companies did not require any qualification other than a residency permit (*Aufenthaltstitel*) and housing registration (*Anmeldung*). The bulk of the problems that the workers would later bring up (in our interviews in mid to late 2021, as well as on several media outlets, including worker-found Twitter and Instagram groups) either did not exist or were not widely experienced by the worker body. In tandem with stay-at-home policies, which restricted the congregation of workers in public or private, the early months of the pandemic were silent in terms of worker organising. Nonetheless, worker groups continued their communication with unions, engaging, in addition to the Liefern am Limit campaign, in strategies leading to workplace groups such as the FAU Lieferando (FAU Berlin 2020).

In early 2021, worker organising picked up pace. Initial efforts were led by Gorillas workers who created Twitter (Gorillas Workers Collective) and Instagram (@gorillasriderlife) pages, highlighting via text and memes issues such as subpar working conditions in

warehouses, broken or insufficient gear, and missing wages. Similar groups were created by Gorillas workers outside of Germany, such as the Netherlands and the UK, as well as workers from other platforms, such as Getir, Flink, and Lieferando. Worker activism led gig workers in other sectors to organise too, and join forces with couriers, both on social media, but also on the streets, to engage in worker-led campaigns.[13]

While social media presence was crucial to gain momentum, it was public demonstrations, and in particular, wildcat strikes, that put Gorillas workers into the spotlight. A small group of Gorillas workers in Berlin (all third country nationals on student or work and holiday visas) had been meeting since early winter 2021 in response to the management's dismissal of their demands (mainly to cease work in sub-zero temperatures and on icy roads.) Some of these meetings were held in conversation with unions, though union involvement was limited to consultancy.[14] The idea of seeking collective representation was further entertained in late March when a Gorillas worker was fired a few weeks prior to the end of his probation. This pushed workers further to take action and invite each other to a General Assembly to set up an Electoral Council, thereby paving the initial legal steps towards founding a Works Council. Management continued to terminate the contracts without due process in the following months (though our data suggests that workers believe contracts were terminated as a repercussion for engaging in collective action), including that of an Argentinian worker named Santiago in early June. In response, dozens of workers occupied the streets and shut down a warehouse in the Prenzlauerberg neighbourhood in Berlin – engaging in the first of what would become a string of wildcat strikes that would mark the months ahead and bring the Gorillas workers movement to international prominence.[15]

Santiago's firing marks a crucial point in platform worker activism in Berlin, especially for migrant workers, who were once again reminded of their precarity in the German platform economy. Unlike their German counterparts, migrant workers did not have as many alternative job opportunities.[16] Platform work provided one of their few means of employment, but it also demanded them to risk their health (during the pandemic), and in some instances, even their lives (working in extreme temperatures) for payments which were often missing or delayed. Moreover, they were at the mercy of the management, who themselves seemed to act based not on worker performance, but investor satisfaction. Being made redundant, often without notice, largely diminished a migrant's already scant changes of finding accommodation in the city or seeking a visa extension. Migrants found that Germany was not the migrant friendly haven they had often envisioned it to be, and platform work was no escape from this reality. In the words of a South Asian-American former Gorillas rider: 'It's [about] overall discrimination in Germany that isn't talked about as much as it should be.' (cited in Ahmed 2021)

Demonstrations ensued, both by Gorillas workers, who launched repeated wildcat strikes (leading to platform management firing even more workers) and couriers from Lieferando (supported by the *Liefern am Limit*/NGG campaign advocating for a 15 EUR/hour minimum wage and better working conditions), Wolt, and Flink. During the summer, hundreds of riders gathered to attend the Friday 13th rider demonstration which has been organised annually by Liefern am Limit long before Deliveroo and Foodora left the German market, during which couriers visited headquarters of the platforms they worked for and made public statements.

By mid-summer, none of the workers from the food or delivery platforms that had taken action succeeded in establishing works councils in Berlin. Outside Berlin, only Lieferando workers had created works councils (which they had largely inherited from Foodora after the takeover.) However, Gorillas workers had organised their initial General Assembly meeting and were on track towards finalising the list of candidates for the Electoral List, who would then participate in the Works Council elections.

Worker mobilisation was also triggered by demonstrations organised in support of fired workers who have chosen to take their management to court. During the summer, Gorillas

management was sued by workers for unlawful firings (and later, for union-busting, that is, for interfering in and slowing down the Works Council organising). A Berlin-wide demonstration was organised in late Autumn in Kreuzberg, with hundreds of workers and community activists in attendance, days before the Works Council election was held. The following week, Gorillas workers succeeded in their efforts and founded the first Works Council in Berlin's food and grocery delivery sector.

Other platform workers would soon follow suit. By early 2022, workers from Getir and dropp would occupy the streets and organise demonstrations in support of fired colleagues and call for Electoral Council elections. Getir eventually established a Works Council in early summer (though the election process was obstructed by management, precipitating a currently pending court case), and dropp workers established a works council in late summer. Lieferando workers in Berlin, too, would have their Works Council by early autumn, and Flink workers are (at the time of writing) in the process of heading to elections.

The success of the Gorillas workers movement encouraged many other platform workers in the food and grocery delivery sector and beyond (Fiedler and Westendarp 2022) to seek collective representation and create electoral and works councils. In the latter half of 2021, weekly meetings and monthly social events were organised by Lieferando workers in Berlin, and later by Flink workers (often attended by couriers from other platforms too), to network, gather support and mobilise towards upcoming works council elections. Community activist groups, such as the Berlin-based leftist *KlasseGegenKlasse* [Class Against Class] and Cologne-based *Aktion Gegen Arbeitsunrecht* [Action against Work Injustice], were not only invited to these gatherings, but also key in providing logistical support and offering pro-bono legal advice and rights to representation in court. It was in large part thanks to these efforts that migrant workers were able to take companies like Gorillas, Getir, and dropp to court for termination of contracts without due process, missing wages, and union-busting. Whether the sparks initiated by the Gorillas workers will lead to sustainable activism in the platform economy, however, is questionable, as structural and strategic obstacles remain in place. Strategically speaking, many platforms operating in the food and grocery delivery sector are moving towards a franchising system. Gorillas was the first to put this into practice, thereby annulling the hard-won Berlin-wide works council, and forcing workers to go for another round of elections, this time based on each warehouse that the platform operates (Rainer 2021). Structurally, forming a works council and seeking union representation continues to be the only path towards lawful strikes in Germany. Yet, given the high rates of turnover in the workforce, and many migrants having their visas contingent upon their lawful employment, it is hard to mobilise workers for wildcat strikes or to keep works council members in the company long enough to sustain a functional works council. Moreover, many workers also do not consider the works council/union representation path (which is the only one that exists for workplace representation in Germany) a viable one as they see their employment in these platforms as temporary – meaning that they see no benefit from the gains that would be won in the long run. Finally, although every worker has the right to take their company to court for unlawful and unfair conduct, workers often risk running out of residency before court cases even conclude. These are some obstacles that remain in place as migrant workers in Berlin try to keep up their collective struggle against precarity in the platform economy.

London

Worker organising in the British platform economy first came to prominence following large-scale strike action by Deliveroo couriers in London in the summer of 2016. The primary demands raised by the striking workers centred on wages, but the backstory of the dispute reveals the way in which migration status and worker organisation have been

intimately linked from the start. Specifically, the strike was a direct response to Deliveroo announcing unilateral contract and payment system changes that dislocated riders from the small but secure payments they had been receiving, from a Pay-Per-Hour (PPH) system of GBP 7 per hour + GBP 1 commission per job to a Pay-Per-Drop (PPD) system of GBP 3.75 per drop with no hourly rate. This shifted remunerated work from the entire time a rider is logged in (including time spent idle) to just the time spent on an active delivery, thus imposing significant wage instability onto workers. Given the structural precarity migrants face in the UK, this change was set to impact migrant workers the hardest. Furthermore, riders considered waiting as part of the work – given that Deliveroo's offer to customers and restaurants is near-instant delivery, it is implied that some riders must be idle in order to respond immediately to delivery requests and fulfil this promise.

The strike that followed was spearheaded by Brazilian migrants working for Deliveroo. They communicated with each other to coordinate through WhatsApp and Telegram networks that were either workplace focused (i.e. specifically connected Brazilian delivery workers) or more general groups populated by the broader Brazilian diaspora in London. Word was able to spread quickly – and crucially, in Portuguese – to inform workers about the impending action in response to Deliveroo's proposed changes.

However, whilst the Brazilian diaspora were numerous, the strikers needed to grow the demonstration and exert greater pressure on Deliveroo. To do so, they used large WhatsApp groups that brought a variety of the workforce together. Frank,[17] a Deliveroo worker, reflected upon this process in Badger (2022, p. 271):

> There were big English language groups and then each community would have their own: say Portuguese, Urdu or Hindi WhatsApps. Bi-lingual workers would be in both groups and translate messages from the English groups into their own community and vice-versa.

These bi-lingual workers acted as knowledge brokers between otherwise fragmented cultural-linguistic groups. Frank continues to recount that these groups had always existed in small numbers, but they:

> . . . Really proliferated in the months before the strike . . . basically, a few months earlier, Deliveroo had worked with the UK Border Agency [UKBA] in a horrible co-ordinated raid at an onboarding centre in Islington [a local Deliveroo office]. People were deported, the whole thing was a mess" (Badger 2022 see also, Morris 2016).

Not long after this Deliveroo raid, Byron Burger also coordinated with the UKBA, leading to the detention of 35 of their workers, with some deported in the subsequent weeks (O'Carroll 2016; Slawson 2016). Waters and Woodcock (2017, n.p.) identify that:

> Riders began boycotting Byron orders [in response to their coordination with the UKBA] . . . co-ordinating this action through WhatsApp, social media . . . [moving the message] through drivers in different parts of the city. These combined to create a climate in which there was greater cohesion and solidarity. The connections between the multiplicity of socio-spatial layers were thickening.

It is this 'thickening' of the socio-spatial layers that — in reference to resisting platform work – exists in symbiosis with the intersectional subjectivities of being a migrant. In the case of the Deliveroo action in 2016, which was the first of its kind in Europe, the networks required to mobilise hundreds of workers from various communities were founded upon the social structures built by migrants to retain, maintain, and increase contact with the

broader diaspora in their locality. These chats formed organically, but in the case of platform work, the links made between various diasporic groups were forged in response to actions initiated by a government that demonstrates its active hostility towards migrants and refugees through detention raids at the workplace. As such, it is this experience of precarity that weakens workers who may feel threatened by the state that simultaneously provides the catalyst for worker organising to cohere and take decisive action at short notice in the platform economy. As studies of teachers, Uber drivers, and Walmart workers have repeatedly demonstrated, many-to-many online communications play a vital role in the development of contemporary forms of collective action (Blanc 2019; Maffie 2020; Wood 2015). The social networks created out of necessity in order to navigate the experience of migration in the face of a hostile border regime have also consistently acted as the scaffolding for workers organising and collective action that draws in wider layers of workers, including non-migrants. As such, migrants play a clear leadership function in many of these disputes.

The cycles of action that followed in the wake of the 2016 London strike have repeatedly shown a common pattern: workers react to negative changes in wages or conditions by organising through existing many-to-many communication networks and face-to-face communication to take strike action (Woodcock and Cant 2022). These strikes have various levels of interaction with trade unions – some remaining completely isolated, whilst others develop a strong affinity with 'indie' unions like the IWGB (Però 2019). This variation can also be explained, in part, by migration status. As demonstrated above, the social networks of migrants can often operate as an initiating node for strike action. Nunes' theorisation of mass networked collective action in digitally mediated social movements identifies how single nodes in a communicative network can play the vanguard function in a process of 'affective synchronisation.' They direct the focus of the network's collective action in specific ways by setting the form of action associated with a particular affect. That is to say, they determine the terms of the phrase: we feel *X*, therefore we do *Y*. However, despite playing this leadership role via informal networks, migrant workers have often opted against playing such a role through formalised trade union structures.

In part, this results from the partial functional redundancy of those formalised trade union structures in the face of the specific conditions of the platform sector: self-employment challenges unions' established statutory role as brokers of collective action and collective negotiators, and workers equipped with large messenger chats are quite capable of organising wildcat action directly themselves. Unions like the IWGB have begun to have more success in organising workers consistently by building coalitions focused on local issues and varied opponents, such as in a 2021–2022 Dalston-based campaign that has seen riders and community groups mobilise to protest against problems such as police-led immigration raids, Hackney Council's failure to provide safe parking and toilet facilities and multiple restaurants' refusals to allow riders to use their toilets and car park. However, the role of the border regime in acting as a disincentive to long-term organising should not be underestimated. Particularly for irregular migrants, trade union involvement constitutes exactly the kind of political visibilisation that Khosravi (2010) identified as being strongly disincentivised by the condition of irregularity. We can also argue that the wariness of engagement in the formalised process of organisation because of the potential recriminations of both the platform and the border regime, also motivates the very widespread practice of workers using masks to conceal their identity during protests and strikes, which has been in evidence since 2016.

We can see, then, that the migration status of platform workers plays a very central role in shaping how collective action emerges in London and does so in multiple overlapping ways. Migration status motivates some workers to undertake collective action rather than just moving from job to job due to limited labour market access; the stresses of migration

(for both regular and irregular migrants) lead to the creation of many-to-many communication structures which often play a vanguard or leadership role in the emergence of collective action; and the vulnerability of some migrants to the border regime also disincentives participation in formalised organisational structures, contributing to a trend towards 'wildcat' action. This action has been persistent, with strikes breaking out with remarkable regularity. However, the impediments identified above have so far limited the transition to more sustained and formally organised action. Platform worker resistance in London remains sporadic.

Conclusion

In this article, we have drawn on our research in Berlin and London to underline the exploitative links between migrant labour and the platform economy and trace the role of migrants in leading repeated bouts of platform worker resistance. Migration, as we have argued, enables the platform economy in its current form. In high-income countries such as Germany and the UK, platform work is disproportionately migrant work. Migrant workers, however, are more than just an exploitable resource. As case studies illustrate, they are also active agents that push the platform economy to change by pushing back against their exploitation by platforms.

Given the disparity in power resources available to the two parties, it is not surprising that their gains have not been overwhelming (not yet, anyway). Migrant worker-led struggles face many obstacles. In Germany, they include largely legal hurdles, such as having to set up an Electoral council list to elect a works council, which (as the Gorillas case shows) takes up to a year in preparation, and often is too long for many workers who see platform jobs as temporary work. Union membership, too, is a challenging sell for organisers because most workers will not work long enough to gain the benefits offered by collective representation (or collective bargaining, which none of platforms in Germany fall under). The alternative, which is wildcat strikes, allows management to retain the right to fire workers at will (which, as the Gorillas case once again shows, platforms are very willing to do). While this does not deter adamant workers to continue to mobilise and occupy the streets, they often end up putting themselves at risk by doing so (unless they are included in the Electoral list and/or members of the works council). Finally, bringing platforms to courts for wrongdoings once again proves to be a process that puts the burden (mainly financial, unless offered pro-bono by community activists, and time consuming) on the worker and is a process which takes too long for most migrant workers to anticipate the potential gains from the outcomes.

Wildcat strikes are a central element of the tactical repertoire of workers in both Berlin and London. This finding replicates the Leeds Index of Platform Labour Protest, which has observed *circa* 1,270 incidents of platform worker protest and found strike action to be an extremely significant modality of platform worker protest (Bessa et al 2022). But whereas in Berlin this tactical choice is produced by the restrictions on the right to strike within the existing industrial relations framework, in London it is the result of a complete absence of any protected right to strike at all. The centrality of immigration raids and repressive state action targeted at irregular migrants in London has also no equivalent in the Berlin case. Different state border regimes with different degrees of associated repression shape the patterns of platform worker mobilisation. Whilst aggressive policing has often catalysed resistance, it is also part of a process of intimidation which disincentivises migrant workers from participating in trade unionism.

In the Berlin case, the role of workers councils and formalised structures for the expression of collective worker voice dramatically changes the dynamics between

workers, unions, and platform management. A defence of employment status and the statutory rights associated with it have created an environment in which migrant workers can access democratic channels to challenge managers over fundamental issues of fairness. On the other hand, workers in London are reliant on more informal tactics, given the complete refusal of most platforms to engage in any form of collective bargaining or even meet with unions. Because of a lack of negotiation, workers have struck and made demands on the assumption that by causing significant economic damage to the platform then management would eventually grant indirect concessions in order to assuage their anger. This is perhaps the modern platform economy equivalent of 'collective bargaining by riot' (Hobsbawm 1952) that was the modus operandi of a Luddite movement in 19th century England who were similarly denied any direct and negotiated relationship to capital.

Despite the obstacles placed in their way by the state and platforms, migrant workers continue to occupy the streets and make their voices heard. Their demands implicitly challenge not only the way in which platforms relate to migrant labour but also the ways in which the state and wider society treats migrants. In the face of raids, limited rights, and repression, they respond with frankly inspiring public displays of strength and unity. In short, they make us realise that without migrant workers, the platform economy would not exist in its current form . . . if exist, at all.

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Notes

1 For research conducted on geographically tethered platforms, Fairwork's methodology involves a tripartite structure that includes desk research, worker interviews and management interviews. Data collected in these three stages are then used to give scores to platforms across five principles: fair pay, fair conditions, fair contracts, fair management, and fair representation. For more on Fairwork methodology, visit: fair.work/en/fw/methodology.

2 For a full list of IWGB branches, see https://iwgb.org.uk/en/branches.

3 For the larger study conducted by the Fairwork research team in Germany in 2021, 101 workers from the following platforms and sectors were interviewed: Zenjob (temporary work), Wolt and Lieferando (food delivery), Flink, Gorillas and Getir (grocery delivery), Betreut.de, Helpling and Careship (domestic services/ care work), FREENow and Uber (ride-hailing) and Amazon Flex (last mile logistics). Of the workers interviewed, about 75% were migrant workers with the largest share originating from Latin America and South Asia but also from Eastern and South Europe and North Africa. Underlining the argument that platforms serve as migration infrastructure (Altenried 2022 – check date), we found clusters of workers from specific regions on the specific platforms: whereas on the Berlin-founded platforms, Gorillas and Flink especially, Latin American workers were overrepresented, the Istanbul-founded platform Getir drew predominantly on South Asian and Turkish migrant workers. Conversely, many Zenjob workers were German citizens, as most Zenjob gigs required conversational skills in German. The regionalised worker pools on different platforms can also be attributed to the fact that in addition to German language fluency, social and informal networks play a large role in workers' migration projects (Drever and Hoffmeister, 2008; Plöger and Becker, 2015). Workers reported that before their departure or upon arrival in Berlin, they consulted friends or social media groups about work opportunities and through these information channels were drawn into platform work. Several workers also reported that they had previously worked for the same platform in another country.

4 While these benefits are provided to all workers by law, not all workers have equal access to them. This, partly, has to do with migrant workers not being informed of their rights to these benefits, due to lack of transparency by platforms, but also due to workers not reading employment contracts even when contracts are written in English, or not caring about long-term provisions, such as pensions or taxes, since many consider platform work as temporary gigs.

5 Failure to prove financial sustenance can lead to the rejection of residency extension.

6 Although German is the official language for bureaucratic and business affairs, such as the documents that workers sign, including the contracts (an English copy may not always be provided, but when provided, serves as a non-binding document), English serves as a *lingua franca* for the majority of non-German-speaking migrant workers in Germany, and especially in the cosmopolitan capital of Berlin.

7 Helping, a domestic work platform included in Fairwork's Germany study, charges as high as 39% for the first three cleanings with each new client. The commission then goes down to 25%. Ride-hailing platforms such as Uber and FreeNow, which in Germany work under a subcontracting model, take as much as 30% per ride for the first 30 rides. For more on commissions, see Fairwork (2021) and Landivar (2022).

8 The UK's Office for National Statistics has yet to recognise a formal definition of the platform sector, and subsequently no data on the demographics of workers are collected by the official body (Office for National Statistics, 2021). In view of this absence, by far the best source of information regarding the sector in England and Wales is polling conducted by ThinkBritain in conjunction with Spencer and Huws (Spencer and Huws, 2021). They estimate that some 14.7% of the UK workforce is engaged in platform work (equivalent to roughly 4.4 million people). This survey also gathers data on work frequency, areas of work, proportion of income from platform work, consumption habits, gender and age. However, their polling does not cover migration status or ethnicity due to the sample size required to collect reliable data on this specific issue (Spencer, 2022).

9 See, for example, Foodora workers signing a collective agreement with the United Federation of Trade Unions in Norway, which led to enhanced contracts. Norway, however, remains one of the only countries where Foodora workers were granted employment status. 'Collective agreement between Foodora and the United Federation of Trade Unions (Fellesforbundet).' Eurofound, https://www.eurofound.europa.eu/fi/data/platform-economy/initiatives/collective-agreement-between-foodora-and-the-united-federation-of-trade-unions-fellesforbundet.

10 Digital Platform Observatory provides a comprehensive overview of worker organising leading to the founding of works councils in Foodora and Deliveroo. https://digitalplatformobservatory.org.

11 Liefern am Limit, https://www.ngg.net/im-betrieb/branchen/gastgewerbe/liefern-am-limit/.

12 The Swedish platform, Wolt, entered the market as Lieferando's competitor in the food sector, while Berlin-based Gorillas and Flink, Istanbul-based Getir, and San-Francisco based UberEats started offering digitally mediated grocery and food delivery services.

13 One supporter that has sided with Gorillas workers since early days of activism was the Berlin Tech Workers Coalition. Available at https://techworkerscoalition.org/.

14 The unions in conversation with Gorillas workers asked at least half of the Gorillas workforce (riders and pickers) to sign up as union members before they could extend further legal support. This request, to recall our discussion in the previous section, however, was hard to meet given the temporary nature of the workforce in platforms such as Gorillas. In the following months, the workers chose to pursue collective action without official union support.

15 Gorillas worker activism was covered extensively in the international media, and highlighted as a case to draw lessons from in analysing the platform economy and courier activism in other country contexts. See, for example, a comparison with the US: Will Rapid Grocery Delivery Change NYC? Look to Berlin. *The New York Times*, 11 February 2022. Available at https://www.nytimes.com/2022/02/11/nyregion/gorillas-rapid-delivery-berlin-nyc.html.

16 Due to lack of German proficiency, as well as limitations (capping the number of hours/week, or maximum income to be made) on employment that their visas mandate.

17 'Frank', like all other worker names in this piece are pseudonyms, provided to protect anonymity.

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