Policy development and the welfare state: The case of the platform economy

Master thesis

By Joseph David Humphreys
Student number 51-188255

The University of Tokyo
Graduate School of Public Policy
Master of Public Policy
Economic Policy, Finance and Development

Table of contents

Introduction

The fourth industrial revolution was coined by Schwab who defines it as a 'range of new technologies that are fusing the physical, digital and biological worlds, impacting all disciplines, economies and industries, and even challenging ideas about what it means to be human' (2016). Technological development has had a significant impact on society in recent decades. The growth in IT computing, storage capacity, connectedness and software applications is transforming business and employment. Governments and businesses are struggling to keep up with 'the quasi-anarchic deployment of apps, data analytics and new forms of business and employment' (O'Reilly, Ranft and Neufield 2018, pp.1). One of the most disruptive new type of business has been platform companies that offer services and goods through apps. Today, nearly everyone in the western world has a mobile phone and is connected to the internet at all times, allowing them continuous access to platform company services. These platforms are creating new types of work that have been presented both positively and pessimistically. Proponents argue that the digitalisation of the economy will allow for a transformation that will 'boost economic growth, raise productivity levels and create an inclusive new vision of social integration for all in the digital age' (ibid).

The platform economy has gone from being a few companies to an ever-growing section of the economy with an ever-increasing number of workers. Uber and Airbnb are the two companies which have been the face of the platform economy and received most attention. The value of the platform economy is demonstrated in the string of IPOs (initial public offering) to come this year. Lyft was valued at $26.4 billion after its IPO in March 2019, and Uber was valued at $70 billion after its IPO in May, demonstrating the value and growth potential of this new form of business (Conger and de la Merced 2019; Bond and Bollock 2019). Significant attention has been paid towards the disruptive nature of these business, especially for the hotel and taxi industry, along with issues concerning safety (De Stefano 2016; Ilsøe and Weber 2018). However, less attention has been focused on platform workers and their conditions. Newspapers have reported on the grievances that platform workers have had and the strike action they have taken (Conger, Xiuzhong Xu and Wichter 2019). However, the majority of research on platform work has been carried out by non-academic organisations such as the JP Morgan Chase Institute (Farrell and Greig 2016). The focus of that research was on wage volatility and job creation (ibid). Little attention has been paid to whether platform workers are

able to access social protection. Thus, there has been a lack of academic research focus of the welfare state and platform work leaving a gap in our understanding of the fourth industrial revolution.

The lack of academic analysis regarding platform workers and social protection requires attention. This lack of attention is important because understanding the social policy reaction of governments to platform work provides an insight into the likely responses policy makers will take to employment related issues of the fourth industrial revolution. Whilst the platform economy represents a small section of the economy and has developed a significant pace, making it hard to analyse, neither points are reasonable excuses for the lack of attention paid to this area. Furthermore, it is important in terms of the understanding of the labour market and how it functions. New forms of work have been established since the 1990s and the platform economy should be understood within this context. Finally, if platform workers are being left without social protection it is a serious step in the erosion of the welfare state and one that should be analysed in detail. Thus, there is a pressing need to analyse the social policy response to platform work.

Another significant need to analyse the platform economy is the ill-defined nature of the subject. There is no agreement on terms or parameters for the platform economy which has made cross-comparison of different analyses difficult. There is a pressing need to establish agreed definitions and boundaries for the platform economy in order to build coherent and comparable analyses in order to better understand the dynamics associated with this new economy. A key reason for the lack of accepted definitions is the every-changing nature of the platform economy with new businesses being developed that seem to challenge categorisations. Yet, there are some fundamental aspects of the platform economy which can be identified and utilised to analyse. As a result, the lack of coherent academic analysis has made the platform economy and the social policies for platform work extremely complex. Therefore, there is a need for clarification in the definitions and nature of the platform economy when analysing the topic in academia.

In order to address these insufficiencies in academia, this thesis has carried out research on social policy development for the platform economy. In order for the research project to be carried out effectively and to provide structure to the complex matter dealt with, definitions surrounding the platform economy required clarification. Chapter one sets out the range of

definitions and categorisations of the platform economy whilst clarifying the definition used in this thesis. The platform economy describes a collection of companies which utilise the internet to allow for the matching of buyers and sellers of goods and services. The main dichotomy in the platform economy is between the capital and the labour platform. Capital platforms leverage the assets or goods owned by the seller, whereas labour platforms allow for the selling of one's labour. Work on labour platforms can be divided into two types: crowdwork and on demand appwork. Crowdwork can be carried out regardless of location and is provided online, in contrast on demand appwork is work carried out locally. Thus, chapter one provides an overview of the definitions applied to the platform economy whilst laying out the most suitable definition to be used going forward.

In order to understand the social policy development process for the platform economy, a review of social policy development literature was required. Chapter two reviews the literature in order to ascertain a theoretical basis to analyse the policy process related to social policy for the platform economy. Three periods of social policy development literature are established. In the first period theories focused on the formation of the welfare state, the second period concentrate on the resiliency of social policies and the final group of theories aim to explain social policy change. Historical institutionalism, the main theory of the second period, is the most suitable theory to explain the complex dynamics of social policy development for the platform economy. Policy feedback effects along with formal institutions combine to influence the direction social policy took in relation to the platform economy. Therefore, chapter two lays out the theoretical foundation to analyse social policy development for the platform economy.

The definitional and theoretical basis were established from exploratory research on the platform economy and the social policy development theories. From this initial research stemmed the research questions. The first research question was: how can the governments' social policy response to the challenges of the platforms be explained? This aimed to look into how the current social policy positions of different states had been established. The second research question engaged in the well-established welfare state categorisation and asked: has social policy development for the platform economy followed the welfare regime of each state? The final research question was: what extent have the policy challenges presented by the platform economy triggered policy change? This was looking at whether meaningful policy

change had been triggered by the platform economy. The three research questions drove the research process.

Chapter four sets out the methodology utilised in this thesis. A qualitative approach was selected because of the need to deconstruct the policy process and critically analyse social policies without previous research to examine. Due to the complexity and unresearched nature of the subject matter this approach allows for the development of strong and consistent theories. Finally, comparative analysis was utilised in order to highlight similarities and differences between cases. Multiple case analysis was used to include one case representing each of the three welfare regime types as laid out by Esping-Andersen. Denmark (social-democratic), France (conservative) and the United Kingdom (liberal) were chosen as they have developed welfare systems and have significantly large platform economies. The three most important social policies were analysed: unemployment insurance, pensions and sick leave. For data collection, document analysis was used as a range of sources were scrutinised because this thesis aims to lay a foundation for social policy analysis of the platform economy. Therefore, a systemic research design was developed in order to carry out reliable analysis on the platform economy.

The findings from the research are set out in chapter four, presenting two social policy development trajectories. Denmark has developed a response in all three social policy areas as platform work undermines the welfare state. The unemployment insurance system was reformed to make it more accessible for platform workers and unions developed tailored pension plans which better fit platform work. Finally, a ground-breaking collective agreement provided the first sick leave for platform workers. In France and the UK, the overwhelming trend has been inaction as platform work has been integrated into existing labour market divisions. In France no meaningful policy development has occurred for platform workers who remain unprotected and placed into the outsider category in the dualised labour market. Similarly, in the UK little action has occurred with platform workers being placed into the gig economy and they remain with significant gaps in social protection. Therefore, two trajectories were established in the research, active social policy development in Denmark and inaction in France and the UK.

Chapter five addresses the three research questions. To answer the first question the historical institutionalist framework set out in chapter two is utilised to explain the dual trajectories of

social policy development for the platform economy. Policy feedback effects and the formal institutions of each case determined the dual trajectories of social policy development. Past public policies influenced the interest and resources of interest groups which only aligned in Denmark for unions to drive social policy development. The experience of Danish policy makers meant that they were in a better position to adapt the welfare state to the platform economy. The lock in effects of past policies meant that it was harder for policy makers in France and the UK to expand social protection to platform workers. In regard to formal institutions the consensus democracy of Denmark encouraged policy action in the context of the platform economy more than the majoritarian systems of France and the UK. For the second research question, all three of the cases followed welfare regime type in their response to the platform economy. Denmark continued to develop social policy focused on decommodification, France continued stratification conservation with the platform economy and the UK maintained its commitment to the market and ungenerous social policies. For the final research question, it was shown that social policy change has not occurred in any of the three cases. Denmark's policy development was a continuation of the social democratic model. The inaction of France and the UK meant that no social policy change occurred however, there is a chance that policy drift may occur in the future. Thus, chapter five lays out a structured analysis of the findings and how they relate to the research questions. Finally, in chapter six the conclusions and policy recommendations based on the research and analysis of the thesis are presented.

Chapter One: The Platform Economy

The platform economy is a complex topic to research due to its newness and the speed at which it is developing. In order for reliable and quality research to be carried out on the topic, clarifications are required first. This chapter will focus on providing an overview of the platform economy which is a small but fast-growing section of the economy. The identification of the parameters of this economy and provision of a coherent and clear definition of the platform economy will facilitate the systematic analysis of the social policy response to platform work. There are an array of definitions used for the platform economy and so a rationale for the choice of definition utilised in this thesis will be provided. Additionally, the benefits and challenges of the platform economy for society, and specifically for the world of work, will be laid out. Most importantly, the challenges for the welfare system will be presented in order to demonstrate why this issue is relevant and requires analysis.

1.1 Defining the platform economy

Scholars have been unable to agree on a clear definition of the platform economy. The discipline remains confusing and difficult to understand as a variety of terms with different parameters are used. Despite numerous efforts to synthesis this literature there has yet to be produced a 'sufficiently authoritative analytical framework' to utilise when analysing the platform economy (Fabo, Karanovic and Dukova 2017, pp.164; De Groen and Maselli 2016; Puschmann and Alt, 2016; Sundararajan 2016, pp.27; Kalleberg and Dunn, 2016, pp.2). One of the key reasons for there not being an agreed definition is the heterogeneity in the platform economy with companies offering a range services utilising different business models 'from subscription models to advertising to the collection of transaction fees' (Dittrich 2018, pp.4). Terms that have been used for the platform economy include; collaborative consumption (Botsman 2013), intermediary economy (Jesnes and Nesheim 2015), gig economy, crowd-based capitalism (Sundararajan 2016) and on-demand economy (Stefano 2016). One of the most common alternative terms is the 'collaborative economy' which suggests the relationship between the platform companies and platform workers as an equal one (EU Commission 2016). There is not equality in this relationship, companies such as Uber are multibillion-dollar companies, whilst platform workers are overwhelmingly from the lower socioeconomic backgrounds (Bond and Bullock 2019). Another popular term is the 'sharing economy' which

incorrectly depicts the platform economy as being something other than a capitalist market economy. Kenney and Zysman correctly assert that the platform economy is a 'more neutral term' that encompasses the wide range of activities which have been discussed (2016, pp.62). Several Nordic trade unions, such as the Swedish Unionen and the Danish Confederation of Trade Unions, have argued in favour of the concept of the platform economy (Söderqvist, 2016; LO 2016). The unions state that the platform economy describes 'the digital tools applied in the transactions' and allows for a more critical assessment that is less swayed by preconceived ideas of what words mean (Rolandsson et al., 2016; Rasmussen and Kongshøj Madsen, 2016). Therefore, the platform economy is a correctly descriptive and neutral term for this economy. The lack of a clear definition poses significant challenges for researching and analysing the issues especially when utilising the work of other academics. Hence, there is a pressing need for an agreement on terms and parameters in regard to the platform economy.

Four approaches to defining the platform economy can be identified in the literature: the generic (nonspecific) definition, the types of platform definition, the employment-centred definition and the crowdwork/work-on-demand binary. The definition best able to describe the platform economy is one that provides a short and precise definition of the platform economy. Then presents the segmentation of this economy based on labour and capital, and then on the types of labour. Too often researchers have attempted to clarify the discipline but have produced overly detailed definitions which further complicate the issue.

The generic definition

The generic definition focuses on the exchange of goods and services between buyers and sellers. Dittrich simply states that the platform economy is 'online intermediators which offer facilitation and transaction services' which brings together supply and demand (Dittrich 2018 pp.4). Further Morell adds that these interactions occur among 'distributed groups of people supported by digital platforms that enable them to exchange (matching supply and demand), share and collaborate in the consumption and production of activities leveraging capital and goods assets, and labour' (2018, pp.17). The most popular definition in this category is provided by the European Commission, which defines the platform economy as 'business models where activities are facilitated by online platforms that create an open marketplace for the temporary use of goods or services often provided by private individuals' (European Commission 2016, pp.2). There are three actors: private individuals (peers) or professionals sharing their assets, resources, time and/or skills; the users of these services; 'intermediaries

that connect — via an online platform — providers with users and that facilitate transactions between them' (ibid, pp.3). In addition, the concept of digital matching has been developed to describe companies in the platform economy. Jolly argues that 'technology has facilitated new business models that are based on matching sellers and buyers of goods and services' (Jolly 2018, pp.216). Services can be 'delivered by workers (physically or digitally)' but 'the platform is not formally the employer, although it may control the production process or prices' (ibid). The US Department of Commerce, the first government organisation to provide a definition, follows the generic definition utilising the digital matching concept. They identified four characteristics which define digital matching firms. They are 'the use of information technology to facilitate P2P transactions, the use of ratings systems, flexibility for workers to choose hours and worker-provided tools and assets necessary to do the job' (Telles 2016, pp.3-4). Thus, the generic definition takes the platform economy to be the technological facilitation of the exchange of goods and services, between a buyer and seller, through a platform run by digital matching firms. This definition is clear, concise and easily understandable and thus provides great utility.

Platform type definition

The platform focused definitions broaden the definition of platforms and look to place the platform economy in the wider digital economy. Gierten divides the platform economy into multiple categories based on transaction type. The category of online platforms is divided into internet platforms and digital platforms, with the latter referring to operating systems out of the scope of this thesis (Gierten 2016, pp.8). Online platforms are operated by firms that are either 'digital matching firms or 'platform operators' (ibid). Hence, Gierten includes companies that 'administer markets for goods (Amazon, e-bay) and information (Google, Facebook)' along with 'platform service markets' such as Uber (ibid). He then divides online platforms by transaction type. In the platform economy, transactions can involve peers only (P2P), 'businesses and consumers (B2C) or businesses only (B2B)' (ibid). Kenney and Zysman take a broad definition of platforms as companies that 'make digital tools available online and support the creation of other platforms and market places' (2016 pp.65). At the macro level there are platforms for platforms, such as Google's Android or Apple's iOS (ibid). In addition, there are platforms that mediate work, including transforming the work of independent professionals such as LinkedIn (for human resources and recruitment), or platforms such as Amazon Mechanical Turk and crowdsource (a digital matching platform) which execute specific tasks (ibid). In the last two categories there are retail platforms and service-hosting

platforms (ibid, pp.66). These definitions are overly general and include too much of the digital economy whilst providing excessively detailed descriptions of specific types of business.

Technological outsourcing of work definition

The technological outsourcing of work definition focuses on how the platform economy is a new means to outsource work. Proponents of this definition have approached the platform economy by focusing on how technology has enabled a new employment form. Prassl and Risak describe work in the platform economy as 'an ICT-based form of organising the outsourcing of tasks to a large pool of workers.' (2016, pp.4). They state there are two types of external crowdwork. There is the service or product that occurs in the real world and where the client and customer come into direct contact (ibid, pp.5). An example is the platform Helping, whereby domestic services can be purchased (Helping 2019). Then there is work 'delivered in the virtual world usually via an interface provided by the platform' (Prassl and Risak 2016, pp.6). Digital work normally consists of simple and repetitive tasks and occurs on platforms such as Clickworker (ibid). Beck as well as Risak assert that the platform economy can be more aptly described as 'outsourcing tasks to a large pool of workers via the intermediary of an internet platform' (2014; 2017 pp.3). Risak argues that two preconditions must be met for the platform economy to come about (ibid, pp.4). First, the crowd, the group of individuals offering their services, must be of such a size that there is always someone available (ibid). Secondly, competition between platforms to maintain enough competition between platform workers to keep prices low. Risak also highlights that the traditional 'control-and-control' systems are replaced by digital reputation in the platform economy which aid 'the selection of platform workers and ensure efficient performance control' (ibid). Thus, this group of scholars define the platform as outsourcing via the use of online platforms. Yet, this definition does not allow room for the non-labour area of the platform economy such as AirBnB and hence is too narrow.

Crowdwork/work on demand via apps definition

De Stefano developed the conceptual framework for this binary division in the platform economy. De Stefano follows the definition of the platform economy consisting of the use of technology so that an online matching of supply and demand can be established at an extremely high speed (2016 pp.475). Crowdwork is defined as occurring when an individual is paid through an online platform to carry out activities online' (De Stefano 2016, pp.471). Platform companies are able to pool workers so that clients can contact a high number of workers across the globe (ibid). In contrast, work-on-demand via apps, which will be referred to henceforth as

on demand appwork, is traditional work that occurs in the real world such as transport, cleaning, running errands and clerical work (ibid, pp.271-2). This work is 'channelled through apps managed by firms that also intervene in setting minimum quality standards of service and in the selection and management of the workforce' (ibid). The International Labour Organisation (ILO) simplified this dichotomy. Crowdwork is defined as 'activities or services that are performed online, irrespective of the location' and on demand appwork is viewed as 'physical activities or services that are performed locally' in a geographically defined area and 'typical activities include transportation, delivery and home services' (ILO 2018, pp.1). Further, the ILO states that all labour platforms online perform three functions: match workers with demand, provide 'a common set of tools and services that enable the delivery of work in exchange for compensation' and set governance rules 'whereby good actors are rewarded and poor behaviour is discouraged' (ibid). The definition provided by De Stefano and the ILO are too focused on labour, but the dichotomy they provide is accurate and clear.

1.2. Economic implications of the platform economy

The size of the platform economy

The platform economy is a small but growing section of the economy that has produced a number of large companies. There is a lack of data on the current size of the platform economy but a number of studies were carried out in 2016 as the platform economy gained more interest among policy experts. The European Union's (EU) 2016 analysis of the platform economy estimated the platform economy in the 28 EU members to be valued at €26.5 billion (European Commission 2018, pp.12). The majority of activities can be found in four sectors: the finance sector accounts for the largest revenues in the EU-28 (EUR 9.6 billion), followed by the accommodation (EUR 7.3 billion), online skills (EUR 5.6 billion) and transport (EUR 4 billion) sectors (ibid). Yet, the platform economy is still relatively small and only constitutes about 0.17% of total EU-28 GDP in 2016 (ibid). The platform economy provides approximately 394, 000 jobs across the EU, representing about 0.15% of total EU-28 employment (ibid). Despite the current modest size of the platform economy large growth is expected. In the United States $14 billion in revenue was generated in 2014 and that figure is estimated to grow to $335 billion in 2025 (Yaraghi and Ravi 2016, pp.5). Junipar Research estimates that the platform economy 'will reach $40.2 billion in 2022, in terms of platform provider revenues, up from $18.6 billion in 2017' (2017). These growth projections are supported by the growth of leading platform companies. Airbnb grew from $2 million at the end of 2015, to $3 million in 2017 (ibid). Uber's

IPO valued the company at $70 billion (Bond and Bullock 2019). Finally, the platform economy is unequally distributed across Europe with the Denmark, France and the UK in the top seven largest markets (ibid, pp.13). France (EUR 6.6 billion; 25% of the total collaborative EU-28 market) and the UK (EUR 4.6 billion; 17%) are the top two largest markets in the EU (ibid). Therefore, although the platform economy is modest at this current time, it has already produced a number of large companies and is predicted to grow at a fast rate. The consequence will be more and more workers being involved in platform work.

The employment trends in the platform economy mirror the size of this economy. Estimates suggest that employment through platforms sits at 0.5 per cent of the labour force in the United States to 5 per cent in Europe and 'it is expected that digital employment will expand in the future, as more jobs, or tasks, move from the offline to the online economy' (ILO 2018, pp.1). Platform work has generated income for 'for 9% of the British and Dutch samples, 10% in Sweden, 12% in Germany, 18% in Switzerland, 19% in Austria and 22% in Italy (Huws et al. 2017, pp.16). The most popular platform service was home services, such as household cleaning, with 30% of people in the United Kingdom using this service and 26% in Sweden (ibid). The second most popular was driving or delivery services which 18% of British respondent and 16% of Swedish respondents said they had used (ibid). The number of individuals earning over half of their income from platform work in the UK represents 2.7% of the labour force (1,330,00 people), 2.7% in Sweden (170,000) and 2.5% in Germany (1,450,000) (ibid, pp.10). Multijobbing, whereby one combines regular employment with platform work, is popular. This is a significant number given there are millions of people working in the platform economy in Europe. Thus, studying the working conditions of this group is important both for understanding the platform economy but also for the quality of life of this group of workers.

Tax challenges

One of the biggest challenges presented by not just the platform economy but the digital economy as a whole is taxation. As digital companies do not have permanent establishments, or physical business operations, in the majority of countries where they are active, they cannot be taxed. (OECD 2018). Yet digital companies are able to make profit by accessing these countries via the internet and utilising the data of citizens to sell advertising whilst not being taxed. Tax is central to the functioning of the modern-day state and hence not being able to tax some of the largest companies is a serious issue. An example is Amazon who paid £4.5 million

in tax in 2018 despite posting a profit of £1.9 billion (Sweney 2018). The welfare state and other services are being put under pressure and governments need to devise methods to fairly tax these companies who gain from accessing the data of their citizens.

1.3. Benefits of the platform economy

Economic benefits

The platform economy offers a number of economic benefits for companies. Firstly, platforms are able to efficiently match supply and demand across several markets at once by exploiting the 'effects of combined networks' which allows these companies to shape market conditions once they are a dominant actor (Gierten 2016, pp.8). An example is that AirBnB can provide a platform for consumers to access multiple markets at once, both geographically and different services (experiences and apartment rentals). Secondly, platforms are able to lower transaction costs. By providing extra information, especially through the review function, 'platforms facilitate buying rather than selling' when market conditions are uncertain (ibid, pp.9). The decrease in market entry costs allows for a great number of buyers and sellers to enter the market leading to a more efficient market (ibid). Thirdly, the platform economy allows for small and medium sized enterprises (SMEs) to access a more flexible and cost-efficient workforce if they are unable to pay fulltime workers (ibid, pp.21). Therefore, the platform economy is more efficient than many traditional markets, lowers transaction costs for both sellers and buyers and provides access to labour for SMEs.

Workers benefits

Workers mainly benefit from the platform economy through increased flexibility. Crowdwork allows workers to choose when and where they work along with deciding what tasks they would like to do (Felstiner 2011; Ipeirotis and Horton 2011; Barnes et al. 2015). As a result, workers who traditionally find it harder to access employment are highly represented amongst crowdworkers, including workers with disabilities or caring responsibilities and residents of rural areas (Zyskowski et al., 2015; Berg, 2016). Work on demand apps allow for flexibility as these workers can decide the hours they work and how long they want to work (Prassal and Risak 2016, pp.8). Hence, platform workers can fit work around their lives and any pressing needs they have, such as childcare.

1.4. The challenges of work in the platform economy

Inflexibility of work

Platform work in reality is not as flexible as is made out and workers are placed under considerable pressure. There can be significant competition between workers for work, especially in crowdwork where competition is global, but also in on demand appwork. Gierten's research suggests that competition forces many platform workers to take work whenever they can get it and they cannot pick and choose (2017, pp.479). Jobs that are posted on platforms may have time limits or may require the worker to be on the app constantly checking for work, limiting flexibility (ibid). Given that a considerable number of on demand appworkers are multi-jobbing, having the flexibility required to earn may be very challenging. Thus, in reality platform work is not as flexible as presented.

The pressure of rating systems

The rating system, whilst good for consumers, places considerable pressure on platform workers. Responsiveness is highly valued in the platform economy and platform workers are rated on this, and there are platforms whereby workers are 'rated for their responsiveness, even when not working, which can create additional stress' (Gierten 2017, pp.21). As the consumer interacts mostly with the app it can lead to an expectation that the service being provided is like machinery creating high expectations which places platform workers under considerable stress (ibid, pp.478). For activities that require face to face contact with clients, a lot of emotional labour is demanded 'to show kindness and be cheerful with customers as this would likely affect the rating of one's work' (ibid). Thus, platform companies have shifted the outsourcing of customer care to individual workers. The ratings system also ties platform workers to one platform, decreasing flexibility, because their 'digital reputation' is controlled and owned by one specific platform company (Risak 2017, pp.5).

Income instability

The research that has been carried out on the income of platform workers suggests that they face extreme income instability. The average platform worker in the United States experiences a 40% change in total income on a month-to-month basis (Farrell and Greig 2016, pp.9). This issue is even more serious when, as will be demonstrated, platform workers lack access to key social protection such as sick leave and unemployment insurance. Moreover, platform workers

are not paid for the time they spend searching for work on the app which can contribute towards wage fluctuation and low pay.

A lack of feedback mechanisms within platforms

Interviews with on demand appworkers have shown that these workers find it very difficult to contact and communicate with platform companies when issues arise such as unfair reviews or if the platform bans them from working. Platform workers are left in limbo where they cannot work and cannot rectify the situation with the company. Compounding the issue is that the company controls the worker's digital reputation. Platform companies are unwilling to communicate with on demand appworkers because they do not want to be seen as an employer and have to bear the responsibility that comes with that position.

Commodification and dehumanisation of platform work

Platform work is the most extreme example of commodification and dehumanisation of work in the current Western economy. A 'humans-as-service' culture has developed which has commodified greater parts of platform worker's lives (De Stefano 2016, pp.278). Additionally, platform workers have become dehumanised as 'work is 'supplied' through IT channels, being them online platforms or apps' (ibid). This disconnects the consumer from the fact that a human being is carrying out the service, leading to a lack of empathy or understanding of the challenges involved in the tasks being requested. The consequence is that consumers have unreasonable expectations. Therefore, the platform economy has commodified and dehumanised work to a greater extent than has been seen in the modern economy.

1.5. Categorising work in the platform economy

Types of work in the platform economy

De Stefano and the ILO provide an all-encompassing and clear definition of work in the platform economy. There are considerable differences in the nature of crowdwork and on-demand appwork. Crowdwork can be carried out regardless of location and tasks can be carried out and delivered online. Thus anyone in the globe with an internet connection can compete for this work. The consequence is that the majority of crowdwork is carried out in the developing world, such as India, driving down the pay crowdworkers receive (Kittur et al 2013, pp.1305). Hence, workers in developed countries cannot compete with those in developing countries. On demand appwork refers 'to physical activities or services that are performed

locally' such as Uber drivers providing transportation services (ILO 2018, pp.1). This thesis is interested in the disrupted nature of the platform economy for developed welfare systems which focuses on challenges within state boundaries. On demand appwork meets that criteria. Further, the majority of workers carrying out crowdwork are in the developing world and thus these countries have less developed social policies. Therefore, on demand appwork will be the focus of this thesis.

Is platform work a new form of work?

Some scholars have argued that the platform economy is not a new form of work but rather an 'intensification of already existing phenomena" of labour outsourcing, commodification of human interactions and the casualisation of work (Drahokoupil and Fabo, 2016; Huws, 2016b). The platform is part of a trend across the developed world of flexibilisation and work becoming more insecure. However, the platform economy is new in its organisation of flexible and insecure work together with the unwillingness of platform companies to take any responsibly for workers. Also, the difficulty the state is currently having in dealing with these companies and the way in which they organise work reaffirms the uniqueness of the platform work.

1.6. Welfare state provision for platform workers

Addressing the working conditions for platform workers is vital, yet it is in the realm of social policy that platform work poses most challenges. Most literature concerning the shortcomings of platform work collate all the challenges together. However, it is in social protection provision that platform work presents the greatest threat by establishing a group of workers with little to no social protection and platform companies with no responsibilities. Platform work has challenged the dual employment classification of employee/self-employed. In doing so platform companies have been able to transfer risk onto the worker. Platform companies refuse to be defined as employers, rather using terms such as 'platforms, networks, marketplaces or intermediaries' (Eichhorst et al. 2017). Platform workers are formally self-employed which means they do not have unemployment insurance, pension coverage or sick leave (ibid). Platform workers have been left to organise and investigate social protection for themselves in a welfare system that, in many countries, was not prepared for them (ILO 2018, pp.4). Only a small share of platform workers report that they contribute to unemployment insurance scheme which is unsurprising given that social protection contributions subtract from the low pay platform workers receive (ibid). The ILO's research suggests that contributions

towards pensions are even lower (ibid). Only 25% of platform workers have access to a pension scheme and of that group only 15% make contributions towards a pension (ibid). Therefore, the majority of platform workers, as self-employed workers, are unprotected against labour market risks.

The definition of employee varies by country but all are centred on the idea of a relationship between employer and employee which is characterised by a dependence or subordination element of the former over the latter. In Denmark, an employee is a person who has a work contract with an employer. The employee/employer relationship builds on the assumption that the employee undertakes one or more work functions, and that his/her employer has the power to organise and direct this work according to managerial prerogative (Kristiansen 2017, pp.138). In France the definition centres on subordination 'by means of a tripartite categorisation of control: the power to direct, power to control and power to sanction' (Lenaerts and Beblavý 2017, pp.5). In the UK, an employer must exert control over a worker and the worker must be the only one who can do his/her job (Forde et al. 2017, pp.84). Thus, there is a trend across countries that an employer/employee relationship is characterised by subordination and dependence.

The platform economy has presented challenges to the welfare state to provide the necessary protection. Legal experts frequently argue that the relationship of workers to the platforms is often a dependent one, and that the status of the workers should reflect this subordination (De Stefano 2016). By not being defined as an employee platform workers have significantly lower social protection compared to employees and even other self-employed individuals. Rosemblat and Stark demonstrate the power asymmetries between platform companies and their workers in a study on Uber (2016, pp.3759). They highlight a number of control mechanisms, such as semi-automated performance evaluations and rating systems, that are important in allocating work (ibid). However, platform workers do not enjoy the same situation as the self-employed. Other self-employed workers have full freedom over when they work and do not have other organisations consistently determining the hours they work. Most importantly, when the platform economy arrived there were not social security systems in place. The lack of effective policies and systems to deal with platform workers means they are unprotected in the labour market. As many unemployment benefits are linked to work in some way, whether it be contributing towards social insurance (Denmark) or being unemployed for a period of time (UK), it was very difficult for these workers to access social protection due to their 'in-out'

worker status. They worked when on the app but that was not stable nor guaranteed. Finally, workers multijobbing combining platform work with a traditional job were not able to easily merge the two when it came to social protection contributions or recognition by the welfare state. Huws et al. are correct when they assert that 'given the diversity of welfare systems in Europe, there is no universal recipe for achieving' social protection for platform workers (2018, pp.160). However, there is clearly a universal problem of platform workers occupying a middle ground between worker and self-employed leaving them with a gap in social protection coverage. Hence, this thesis is focused on the reaction, or inaction, of different states in regard to social protection for platform workers.

1.7. The thesis definition of the platform economy

The definition utilised in this thesis is a combination of the generic definition and the crowdwork/on demand appwork dichotomy. The starting point of defining the platform economy should be an explanation of what occurs. Technological online platforms utilise the internet to allow for the matching of buyers and sellers of goods and services. Platform companies organise the online market of a good or service in order to bring together supply and demand sides (Dittrich 2018, pp.4). These companies make profits by charging a fee or taking a percentage from the transaction between the buyer and seller. Platforms are able to obtain profits due to having 'zero or quasi-zero marginal costs of providing services through those platforms' because once the app has been developed little further capital is required (Greve 2017, pp.38). Certain scholars argue that one sole app will come to dominate a market for a good or service but there is evidence of competition such as between Uber and Lyft. Yet, 'network effects', whereby the value of the company rises as more sellers and buyers join and hence those sellers and buyers are more reliant on that app to access the market, do protect the position of a platform (Gierten 2016, pp.8).

The platform economy can be divided into two types of platforms: capital and labour. Capital platforms leverage the assets or goods owned by the seller, and an example is AirBnB which allows individuals to rent out a room or an apartment (Ilsøe 2017, pp.335). Labour platforms are for the selling of one's labour such as Deliveroo which allows food carriers to sell their services (ibid). The platform economy is heterogeneous, composed of a range of companies with differing businesses models, but at their core they can be categorised as either labour or capital platforms. Scholars such as Kalleberg and Dunn looking to categorise sectors within

the platform economy are somewhat premature considering the speed of development of this economy (2016, pp.11). The inclusion of Google and Facebook under the premise that they are 'platforms' is too simplistic. The majority of the literature does not include them as they utilise a different profit model based on advertising and data utilisation. This group of companies are not interested in mediating sales between two parties. Although scholars are correct to analyse work in the platform economy that cannot be the focus of a definition considering capital platforms. Thus, the definition provided clearly defines the platform economy as a whole, whilst highlighting the main divide with this economy, but is not being overly complicated and detailed.

1.8. Conclusion

Overall, a clear definition of the platform economy has been provided which is key to structuring the research and analysis of social policy development for this new form of work. The definition utilised in this thesis is as follows.

The platform economy is made up of online technological platforms that utilise the internet to allow for the matching of buyers and sellers of goods and services.

Although the platform economy is a small part of the overall economy it is quickly growing along with the number of workers. The platform economy provides benefits to both workers and consumers but poses challenges to the tax system and the labour market. Yet, work in the platform economy is not as flexible as presented because of the instability of wages and pressure from platform companies. Pressure also stems from the rating systems with the lack of feedback mechanisms providing no outlets for unfair practises related to the system. Finally, platform work is encouraging the complete commodification and dehumanisation of work. This thesis separates the challenges posed by platform work to the welfare state. The categorisation of platform workers as self-employed is dubious and has left many with low or non-existent social policy coverage. Welfare systems have struggled to integrate platform workers into welfare systems that are based on the employee/self-employed dichotomy. Thus, the focus of this thesis is on how countries have reacted to the new challenges posed to welfare provision.

Chapter Two: Literature Review

This thesis aims to understand and analyse social policy development for the platform economy. The topic is complex and unexamined in academia which makes the task of analysing multiple cases challenging. The utilisation of theory can provide a framework to better understand and compare social policy development processes. This chapter will outline the different theories that explain social policy development. Three largely chronological periods can be identified into which theories can be placed. The first period is made up of theories that came to prominence in the post-war era and aimed to explain the social policy development that established the welfare state. In the second period the focus was on explaining the resiliency of the welfare state. The last, and current, period is composed of theories which look to explain social policy change today. Table one sets out the three chronological periods and the relevant theories. The final section of this chapter will present the theory which this thesis will utilise when analysing the findings of social policy development for the platform economy.

Period	Theory	Explanation	Scholars
1st Period	Industrialisation Theory	The formulation of the welfare state was a natural consequence of economic development.	Wilensky and Lebeaux; Kerr et al.; Pryor; Rimlinger; Pampel; Weiss.
	Marxism	The welfare state was formed due to the contradictions of capitalism.	O'Connor; Ginsberg; Offe.
	Power Resources Theory	Left-wing party success was the key factor in the development of the welfare state.	Korpi; Esping-Andersen; Cameron; Stephens; Castles; Hicks and Swank; Myles; Palme; Kangas.
2nd Period	Historical Institutionalism	Political institutions and previously enacted public policies structure the political behaviour of bureaucrats, elected officials and interest groups during the social policy making process. Welfare states are path-dependent and so difficult to reform.	Pierson; Skocpol.
3rd Period	Incremental Change	Social policy making is a constrained process that removes many policy options and forces actors to focus on making minor modifications to policies.	Lindblom; Tynes.
	Ideational Analysis	Discourse and ideas influence the beliefs of political actors and so, the social policies they develop	Beland and Powell; Beland and Cox; Campbell; Daigneault; Padamsee; Parsons; Schmidt.
	Punctuated Equilibrium	Social policy goes through long periods of continuity and is then punctuated by a drastic policy shift and then continuity returns.	Baumgartner and Jones; Hall and Cashmore.
	Paradigm Change	Three orders of change that depend on how drastically the policy differs from the status quo.	Hall.
	Cumulative Change	Small adjustments made to social policies cumulate into significant institutional transformations.	Mahoney and Thelen; Streeck and Thelen.

Table One: The Three Periods of Social Policy Development Theories

2.1. First period: the formation of the welfare state

Originally, social policy scholars focused on how to explain the establishment and formation of the welfare state. Industrialist theorists claim that the welfare state was the inevitable production of economic development. Marxists refute industrialist's claims, arguing that the welfare state is inevitable due to the contradictions of capitalism which force capitalists to provide concessions to the proletariat. Both industrialists and Marxists utilise a functionalist logic which makes the theories overly deterministic. The final theory of this period is power resources theory that states that the welfare state was the product of left-wing party success. Power resource theory is best able to explain the formation of the welfare state, yet it is not effective in describing social policy development for the platform economy.

Industrialisation theory

The industrialisation theory argues that the welfare state came about as a natural consequence of capitalist economic growth (Wilensky and Lebeaux 1958; Kerr et al. 1960; Pryor 1968; Rimlinger 1971; Wilensky 1975). Kerr et al. argue that industrialisation erodes the social support system based on kinship and the patrimonial traditions of agrarian societies leading to new demands for public services (Kerr et al. 1960). The shift in the economy to dependence on wage labour meant that groups without labour to sell became vulnerable including the old, sick and the young (Pampel and Weiss 1983). The result of these economic changes was the expansion of the state to support the labour force in a new and complex society. (Kerr et al. 1960, pp.152). Social policy development is viewed as an inevitable stage of economic growth during the transition from feudalism to capitalism. This theory is overly deterministic and generic in describing social policy dynamics, failing to analyse in greater depth the policy development process. Thus, industrialisation theory was important as it was the first theory specifically focused on explaining social policy development.

Marxist theory

Marxists challenged the industrialisation theory, viewing the welfare state as an inevitable production of capitalism in order for its self-maintenance. O'Connor was the first to argue that the welfare state is driven by two contradictory forces: the need for the capitalist state to maintain conditions for capital accumulation and in order to socially legitimise the production process (1973). Ginsberg agrees seeing the welfare state being formed 'around the contradictions of capitalism and conflicts of capitalist development' (1979, pp.2). The welfare

state came about to allow for capitalism to have a ‘reserve army of labour’ in order for the accumulation of capital to continue (ibid). The welfare state is identified as part of capitalist oppression as it ‘seeks to maintain the economic dominance of capital…and to compensate for its disruptive and disorganising consequences’ (Offe 1984, pp.16). Furthermore, it guarantees the ‘survival of the 'unregulated' sphere of capitalist exchange’ (ibid). Once again, like the industrialisation theory, Marxist theory of social policy development has a functionalist logic, that is structurally determined. This functionalist logic makes application of the theory to specific policies impossible without engaging with Marxist theory. Thus, for Marxists the welfare state is an inevitable outcome of the contradictions of the capitalist economic system yet it is an overly deterministic theory.

Power resources theory

The power resource theory challenged the functionalism of industrialisation and Marxism, stating that the welfare state was the result of left wing party success. Korpi argued that the welfare state was the product of formalised class conflict within the democratic system (1983, pp.377). He defines power resources as ‘characteristics which provide actors – individuals or collectivism – with the ability to punish or reward other actors’ (ibid, pp.355). The power resources distribution ‘between the main collectivisms or classes in a country affects the form and direction of public interventions’ determining the welfare state form and size (ibid, pp.356). The greater the power resources held by working class groups, unions and parties, the larger and more generous the welfare state. The power resources theory is able to explain the variation in social policy between different countries. Thus, Scandinavia’s more generous and developed welfare states can be explained by the greater power resources of the left wing parties from their alliance with farmers (Esping-Andersen 1990, pp.105-138). Korpi’s theory was backed by multiple studies underscoring the link between working class power and the establishment of strong welfare states (Cameron 1978; Stephens 1979; Castles 1982; Hicks and Swank 1984; Myles 1984; Esping-Andersen 1985; Palme 1990; Kangas 1991). The power resources theory is compelling for explaining the establishment of welfare states but is less useful in explaining present day social policy development. This is because of the decrease in the importance of class and the different dynamics surrounding the continuation of the welfare state versus its founding.

The first period focused on explaining the formation of the welfare state. Industrialisation and Marxist theories took functionalist approaches to argue for the welfare state being inevitable.

However, the power resources theory was better able to explain both the establishment and heterogeneity of welfare states. This period, whilst valuable, is unable able to contribute to social policy in the present day.

2.2. Second period: the resiliency of social policies

The second period of social policy development theories was dominated by one theory of institutionalism and more specifically historical institutionalism. After debates surrounding the formation of the welfare state subsided, scholars were interested in analysing the resiliency of the welfare state and the past policies which had established them. Historical institutionalism was the central theory to explain welfare state resiliency, arguing that past policies significantly influence the policy development process. Whilst historical institutionalism was largely focused on explaining the social policy development process in the face of retrenchment, the theory has significant value in explaining social policy development for the platform economy.

Institutionalism

The trend in social policy development literature moved away from explaining the establishment of the welfare state onto analysing the dynamics of social policy making. The theory which dominated this period was institutionalism, specifically historical institutionalism. In order to understand historical institutionalism, sociological and rational choice institutionalism must first be defined. Although, neither of the latter two theories had much prominence in social policy analysis, they need to be considered in order to clarify historical institutionalism. Institutionalism is defined as a theory that focuses on the formal institutions of government, governance and electoral systems, and informal institutions, the social and political effects of policies.

Rational choice institutionalism argues that individuals utilise institutions in order to maximise their own interests. The expectation is that individuals have a set of preferences and will 'behave entirely instrumentally so as to maximise the attainment of these preferences' (Hall and Taylor 1996, p.12). Individuals within political institutions behave strategically, based on 'the actor's expectations about how others are likely to behave', and those actions determine political outcomes (ibid). The role of institutions is to structure the interactions between actors providing boundaries to the possible actions and reducing uncertainty concerning other actors' behaviour (ibid). Institution creation is based on the desire and value the said institution has

for actors. It is maintained 'because it provides more benefits to the relevant actors than alternate institutional forms' (ibid, pp.13). Therefore, rational choice institutionalists take an actor-centred approach to analysing the policy development process and consider institutions as simply structuring the strategic actions of actors.

Stemming from the field of sociology, sociological institutionalists view the customs and procedures associated with the policy process as 'culturally specific practices' which have been 'assimilated into organisations, not necessarily to enhance their formal means-ends efficiency, but as a result of the kind of processes associated with the transmission of cultural practices more generally' (ibid, pp.14). In contrast to rational choice institutionalism, sociological institutionalism defines institutions broadly as more than just rules, procedures and norms but 'the symbol systems, cognitive scripts, and moral templates that provide the 'frames of meaning' guiding human action' (ibid). Hence, culture and institutions are seen as one and the same. Originally, sociological scholars argued that individuals are socialised by institutions to adopt particular norms associated with that institution (ibid). However, there is greater support for the argument that institutions provide the 'cognitive scripts, categories and models' that are essential for individuals to act in the policy process because they need these tools to analyse the world (ibid). Thus, sociological institutionalists acknowledge that institutions' cultural practises mould and influence human action in the policy process.

Historical institutional

Historical institutionalism dominated the second period of social policy development theorising. The central premise of historical institutionalism is that political institutions and previously enacted public policies structure the political behaviour of bureaucrats, elected officials and interest groups during the policy-making process (Béland 2005, pp.3). Skocpol was a pioneer of applying historical intuitionalism to the social policy process. For her the approach 'views the polity as the primary locus for action' yet understanding that political activities in which actors are 'conditioned by institutional configurations of governments and political party systems' (Skocpol 1992, pp.41). The theory combines both rational choice and sociological institutionalism by recognising that 'human beings are both norm-abiding rule followers and self-interested rational actors' (Steinmo 2008, pp.126). Most prominently, Pierson applied a historical institutionalist analysis to the resiliency of the welfare state in the face of retrenchment efforts from right-wing politicians (1994). He argued that social policy reform is unlikely because the popularity of the welfare state means that incumbent

governments would bear high costs if they carried out retrenchment (ibid). This theoretical approach helped in establishing that the new politics of the welfare state was different to the expansionist period. Thus, historical institutionalists argue that previous public policies and political institutions condition social policy responses, normally tending towards reinforcement of the status quo.

Pierson's theory of path dependency was developed in order to explain the social policy dynamics of retrenchment. Path dependency is defined as 'the causal relevance of preceding stages in a temporal sequence' (2000, pp.252). He argues that past policies create vested interests and long-term commitments, which he refers to as 'lock in effects', that constrain the choices available to policy makers (Pierson 1996, pp.153). As a result, there is continuity in social policy. Pierson's path dependency takes a historical intuitionalist approach by considering the history of institutions and policies to be important in explaining policy making. Pierson's focuses on the theme of retrenchment in British and American welfare states (Pierson 1994). This context differs from the platform economy as Pierson aims to explain why the goals of certain policy makers were not achieved. Whereas, this thesis analyses the exogenous shock of the platform economy, making it difficult to directly apply the theory in the same manner. However, the policy dynamic of lock in effects is useful when accompanied by other elements in a theory of historical institutionalism. Thus, the path dependency theory does not apply to the platform economy but Pierson's concepts of lock in effects can be utilised.

The second period shifted focused to the resiliency of the welfare state. Historical institutionalist analysis was utilised, first by Skocpol and then Pierson, with the latter becoming renowned for his path dependency theory of the welfare state. Both scholars provide coherent analyses of the social policy process that can be utilised to explain social policy development for the platform economy. Therefore, historical intuitionalism will be central to explaining the policy development process in the platform economy.

2.3. Third period: social policy change

The third period, which encompasses the present day, saw five theories put forward to challenge Pierson's path dependency theory. Incrementalism argues that policy development occurs as small modifications. Ideational analysis aims to incorporate the importance of ideas in shaping the definition and approach to policy problems and how that impacts the policies

developed. Punctuated equilibrium aims to explain both policy continuity and change by arguing that policies go through periods of incremental modifications, and then a large shock shifts the policy, and then stability returns. According to paradigm change there are three orders of change based on the severity of change, providing a more nuanced approach. Cumulative change also incorporates a nuanced approach by providing categorisations of change. The theory views social policy changes as being typically made up of small modifications that lead to a large policy shift over time. However, these theories are mainly focused on existing policies changing. The platform economy is a new exogenous challenge for the welfare state and may require completely new policy responses, making none of the five theories suited to explaining social policy development.

Incremental change

Incrementalism is the oldest theories in the social policy change literature and the foundational theory of policy analysis in the post-war era. The theory views policy making as a constrained process which removes many policy options and forces actors to focus on making minor modifications to policies. The pioneer was Lindblom who argued that policy change occurs through 'small steps' because of the absence of certainty regarding outcomes driving politicians to focus on developing policies gradually (1979, pp.517). Policy makers do not focus on sweeping changes because they are concentrated on what is politically possible and so 'the administrator focuses his attention on marginal or incremental values' (1959, pp.82). The approach was harnessed again to challenge Pierson, especially in the United States. An example is Tynes' analysis of the development of social security from its conception in 1935 which found that large scale changes have not occurred and rather changes have been small and piecemeal (1996). Moreover, Lindblom presents incremental change in one block and does not provide any nuance. Social policy development for the platform economy has not produced any drastic shifts but to describe all three cases as the same would be to oversimply the issue and ignore key differences. Thus, Lindholm was a pioneer in policy development with his theory of incremental change, yet it has been surpassed by more nuanced and complex theories in recent years.

Ideational analysis

The ideational analysis approach 'stresses the role of discourse and ideas in policy change, which focuses on how the beliefs of political actors shape their decisions and the reforms they enact' (Béland and Powell 2016, pp.4; Béland and Cox 2011; Campbell 2004; Daigneault

2014; Padamsee 2009; Parsons 2007; Schmidt 2011). The ideas, defined as 'the changing and historically-constructed 'causal beliefs' of individual and collective actors', impact on how policy makers approach and carry out policy development (Béland 2016, pp.736). Ideas impact on how actors define the policy problem and how they respond and identify solutions. Ideational scholars argue that the neglect of the impact of ideas has meant scholars have missed a key influencing factor of policy development. Most scholars will accept that ideas have an impact on policy making, however, as Daigneault highlights 'ideational explanations typically rely on intangibles that are difficult to define and measure' (2014, pp.454). It is very difficult to measure the actual impact of ideas on policy making. Additionally, the nature and processes of how ideas become influential in the policy process have not been clarified (Berman 2013, pp.222). Consequently, some scholars have tried to blend ideational analysis with other theories. Beland puts forward a theory of ideational analysis based on 'contingent historical constructions such as cultural beliefs and political ideologies' which influence the policy making process (Béland 2016, pp.737). Whilst strengthening the measurability of the theory by introducing institutionalism and highlighting the role of ideas in influencing other forms of change, the measurability issue remains. Overall, ideational analysis has value especially when combined with existing theories. Yet, utilising ideational analysis to explain policy change is extremely challenging due to its fluid nature and the difficulties of measurability.

Punctuated equilibrium

Punctuated equilibrium theory states that policy goes through long periods of continuity and is then punctuated by a drastic policy shift, and afterwards the continuity returns. Baumgartner and Jones developed the theory from paleo-biology which asserts that periods of marginal adaptation and revolutionary transformation are typically linked in a 'punctuated equilibrium' pattern of policy change (1993). The concept also draws from the cybernetical concept of 'homeostatic' whereby 'positive and negative feedback mechanisms allow a new equilibrium to be reached after stable system parameters have been altered by outside forces' (Hall and Cashmore 2009, pp.37). Punctuated equilibrium theory accepts the incrementalist argument that policy change occurs in small developments but largely remains the same, then an exogenous shock moves the new policy to a new equilibrium (Steinmo 2008, pp.128). This theory is attractive as it aims to explain both stability and change. However, in general, the theory struggles to provide a clear and convincing definition of what a significant tipping point is. The lack of a clear definition allows for too much room for objectivity making it difficult to identify when a significant change has occurred. Therefore, punctuated equilibrium effectively

built on incrementalism to put forward a theory of how policy remains stable and then drastic shifts occur. However, the definition of a significant exogenous impact and the resulting change is unclear.

Paradigm/path change

Hall's theory of paradigmatic change is one of the most well-known theories in public policy research. Hall states that there are three types of policy change. First order change matches Lindblom's incrementalism of 'routinised decision making' (1993, pp.230). With second order change the instruments of policy change 'without radically altering the hierarchy of goals behind policy' (ibid, pp.282). Furthermore, changes are made 'in response to dissatisfaction with past policy rather than in response to new economic events' (ibid, pp.283). Finally, for third order change to have occurred there must have been a 'radical shift in the hierarchy of goals guiding policy', the instruments utilised to influence policy and 'the settings of those instruments' (ibid, pp.284). It also includes a change in the 'discourse utilised by policymakers (ibid). Thereby, Hall's ground breaking work provided a framework for identifying different types of policy change. Howlett and Cashmore add dimensions of mode and tempo of change to arrive at four types: classic paradigmatic (one large step); rapid incremental (many small but fast steps); gradual paradigmatic (one large but slow-moving step); and classic incremental (many small and slow-moving steps) (2009). However, as a descriptive model Hall's paradigmatic change is effective, but it is less effective at explaining why the orders of change occur. As Béland and Powell highlights, it is hard to analyse the three orders of change, especially the second and third order change (2016, pp.135). Hence, this theory is not suited to this thesis' attempt at explaining why countries responded differently to the platform economy.

Cumulative change

The theory of policy change that is most popular in the current literature is cumulative change. The central focus of this analysis is 'gradual institutional change' or 'cumulative, but transformative' whereby small policy adjustments cumulate into significant institutional transformations (Mahoney and Thelen 2009; Streeck and Thelen 2005). A number of different scholars have developed theoretical frameworks to explain such change. Hacker argues that no one theory can explain policy change, rather there are a number of differing forms that change can take, depending on the situational context (2004, pp.246-8). He argues that there are two barriers in policy making, one is a barrier to internal policy conversion and the other a barrier to authoritative policy change (ibid, pp.248). Hacker developed a 2x2 table based on the

barriers (see table two). Four types of policy change are presented in the table: drift, layering, conversion and revision. Drift is caused by 'a shift in the social context of policies' such as the rise of a new social risk (ibid, pp.246). Layering is a tactic to work around entrenched interests 'by adding new institutions rather than dismantling the old' (ibid, pp.248). Hacker utilises Thelen's definition of conversion as 'occurring when existing institutions are redirected to new purposes' leading to a change in their form and function (Thelen 2003). Finally, revision is the 'formal replacement or elimination of existing policy' (Hacker 2004, pp.248). However, there are a number of reasons why Hacker's model is of limited use for explaining social policy development for platform workers. Firstly, Hacker's model is focused on explaining retrenchment, which is an important trend in social policy, but the platform economy is an area whereby there has been either social protection expansion or not, but there has not been retrenchment. Secondly, Hacker's model focuses on endogenous changes, his case study is the conservatives' attempt to change and reduce social protection in the United States. In contrast, the platform economy was an exogenous shock to the welfare state. Thus, Hacker's model is ineffective for explaining social policy development for the platform economy.

Barriers to Authoritative Policy Change	Barriers to Internal Policy Conversion: High (Low levels of policy discretion, strong policy support coalitions)	Barriers to Internal Policy Conversion: Low (High levels of discretion, weak support coalitions)
High (Many veto players)	Drift (Transformation of stable policy due to changing circumstances) Illustrative Example: Erosion of Scope of Protection of Existing Public Social Programs and Private Benefits	Conversion (Internal adaptation of existing policy) Illustrative Example: Employers' Restructuring of Publicly Subsidized Voluntary Workplace Benefits
Low (Few veto players)	Layering (Creation of new policy without elimination of old) Illustrative Example: Creation and Expansion of Tax Subsidies for Private Retirement Accounts	Revision (Formal reform, replacement, or elimination of existing policy) Illustrative Example: 1996 Welfare Reform

Table Two: Types of change in Hacker's theory of cumulative change.

Thelen and Mahoney provide a more convincing cumulative change model known as gradual institutional change, once again using a 2x2 table (see table three). The four modes of policy change are: displacement (the removal of existing rules and the introduction of new ones); layering (the introduction of new rules on top of or alongside existing ones); drift (the changed impact of existing rules due to shifts in the environment); and conversion (the changed enactment of existing rules due to their strategic redeployment) (Thelen and Mahoney 2009, pp.15-16). Their theory identifies four types of actors associated with the types of change based on institution and context (see table four) (ibid, pp.28). The classification of change agents is developed from two questions: does the actor seek to preserve the existing institutional rules? And, does the actor abide by the institutional rules? Insurrectionaries (do not preserve or follow); symbionts (preserve but do not follow); subversives (do not preserve but follow); and opportunists (have ambiguous preferences and exploit whatever possibilities exist) (ibid). However, the actors associated with the two types of change (drift and layering) that best describe what occurred in platform economy are not present. Therefore, Thelen and Mahoney's model of cumulative change is unable to explain social policy development for the platform economy.

		Characteristics of the Targeted Institution	
		Low Level of Discretion in Interpretation/ Enforcement	High Level of Discretion in Interpretation/ Enforcement
Characteristics of the Political Context	Strong Veto Possibilities	Layering	Drift
	Weak Veto Possibilities	Displacement	Conversion

Table three: Types of change in Thelen and Mahoney's theory of cumulative change.

		Characteristics of the Targeted Institution	
		Low Level of Discretion in Interpretation/ Enforcement	High Level of Discretion in Interpretation/ Enforcement
Characteristics of the Political Context	Strong Veto Possibilities	Subversives (layering)	Parasitic Symbionts (drift)
	Weak Veto Possibilities	Insurrectionaries (Displacement)	Opportunists (Conversion)

Table four: Change actors in Thelen and Mahoney's theory of cumulative change.

The third chronological period challenged Pierson's claim of continuity and focused on explaining policy change. Five theories are presented: incremental change, ideational analysis, punctuated equilibrium, paradigm change and cumulative change. However, none of these theories is able to adequately describe the social policy development for the platform economy.

2.4. Historical institutionalism and social policy development for the platform economy

Consideration of the different theories that explain social policy development has identified that historical institutionalism is the most appropriate to use in relation to the platform economy. This is because it highlights how past policies and political institutions combine to stifle or facilitate policy. Two central elements underpin historical institutionalism: informal and formal institutions. Within informal institutions policy feedback mechanisms have been instrumental in influencing the policy development process. Policy feedback plays out in three ways; by influencing the interest and resources of interest groups, determining the experience and preferences of elites and through lock in effects. Formal political institutions, political systems and electoral systems, impact policy making by determining the opportunities groups have to impact the policy makers and the concentration of power in the executive.

Policy feedback

Policy feedbacks is a term to explain the impact of past policies on different groups and individuals involved in the policy making process and thus the policies which stem from that process. Policy feedback effects can be divided into three groups: the interests and resources of interest groups; the experience and preferences of policy makers; the establishment of lock-in effects. The dichotomy of self-reinforcing and self-undermining policy feedback has been omitted due to its weak explanatory ability in relation to the platform economy (Jacobs and Weaver 2015, pp.442). The three pillars of policy feedback, comprised of the theories of Skocpol and Pierson, allowed for a full comprehension of the role of past policies in policy development. These pillars that will be presented are: interests and resources of interest groups, experiences of policy makers and lock in effects.

Policy feedback impacts the interests and resources of interest groups. Skocpol highlights that previous policies lead to 'changes in social groups and their political goals and capabilities' affecting the way they approach the policy process (1992, pp.58). Policies and government action can afford 'both incentives and resources' to groups that 'may facilitate or inhibit the formation or expansion of particular groups' (Pierson 1993, pp.599). The influence on interest groups' incentives and resources affects the amount of impact that these groups can have and their willingness to attempt to influence policy. First, past policies influence the goals of interest groups. Interest groups are focused on defending the benefits they have gained from past policies. Accordingly, interest groups have a high incentive to act when previous policies are placed under threat. Policies also create opportunities for interest groups to be entrepreneurial and obtain power by coming together to represent new interests. Entrepreneurialism can include interest groups expanding. Second, previous policies influence the resources that interest groups have to influence the policy making process. The result is the creation of central and peripheral actors in the policy process. As has been mentioned, there is an unequal distribution of power among interest groups with some groups being central actors in a policy area, and important to the functioning of said policy, whilst other are ineffectual. The resources that interest groups have are key to that group but also the ability to bring those resources 'to bear on decision makers' (Pierson 1993, pp.601). Government policies can create interest group resources in a simple manner by passing legislation which provides 'funding to favoured organisations or provides incentives for individuals to join particular groups (e.g. by banning or harassing alternative organisations)' (ibid). Or policies may 'strengthen particular groups by increasing their access to decision makers' (ibid). Therefore, interest groups are

positioned by previous policy to have high or low influence within the political system which determines their ability to influence policy development when new issues arise. Overall, policy feedback effects influence the incentives and resources of interest groups which affects how they react to new policy challenges.

The experience that elites have in policy making influences the way in which they approach a new policy challenge and the solution they view as viable. Skocpol asserts that past policies influence 'the options available to policy makers as they themselves perceive it' which translates into a narrowing of administrative possibilities (Skocpol 1992, pp.58). The feedback is twofold as policymakers are influenced as they specialise in implementing policies as they have done. The past policies influence how they look back and judge the past. Skocpol's work links to theory of policy learning. Policy learning has been criticised as being too sweeping a theory, yet it has value in this context to add to the evidence of policy feedback (Pierson 1993, pp.912). Whilst this thesis will not engage with the complex and detailed literature of policy learning, there is a need to highlight that elites are influenced by past policy making as well as the policy itself. The experience and expertise of policy makers influences the options which they are willing to identify and implement. Elites may look positively or negatively on past policy making and either view the approaches taken as valuable and effective or not. Policy development design is influenced by perceived past successes (Pierson 1993, pp.612). Hence, what is being highlighted is the impact of past policies on elites, which has measurement challenges, but there is considerable evidence to show that this has some influence in the policy development of the present day. This is most evident in Denmark's continual ability to reinvent and adapt the universalist model to modern day challenges. Whereas, British politicians are more willing to disregard the policy making of the past, especially when a new party is in government.

The final policy feedback mechanism is lock-in effects. Past policies lead to long term commitments by governments and individual citizens which make it very difficult to change policy direction. According to Pierson policies 'may create incentives that encourage the emergence of elaborate social and economic networks' which significantly increases the costs of adopting alternative and 'inhibiting exit from a current policy path' (Pierson 1993, pp.608). Major policy initiatives have major social consequences. Individuals make important commitments in response to certain types of government action. These commitments, in turn, may vastly increase the disruption caused by new policies, effectively "locking in" previous

decisions (ibid). Public policies 'create or extend patterns of complex social interdependence' that have unforeseen knock-on effects (ibid, pp.610). Citizens react to these policies and can make long-term decisions based on them, such as to investment in education or purchase certain goods. Policies 'create commitments' in a range of contexts and guide citizens onto certain 'paths that are hard to reverse' (ibid, pp.909). Finally, Pierson argues that policies with 'high levels of interdependence and where intervention stretches over long periods are particularly likely sites for lock-in effect' (ibid). Therefore, policies commit governments into the future and influence the decision making of citizens to make long term investments which result in narrowing the policy options available.

Formal political institutions

The second element of historical intuitionalist analysis is a focus on the impact of formal institutions of the state. The formal political institutions of the state dictate the opportunities available to groups to influence the system. Domestic institutions 'make up the political incentive structure of the policy making, determining the degree of influence and power that relevant policy actors can bring to bear on the policy process' (Hemerijck 2002, pp.188). There are two types of democratic political systems: majoritarian and consensus. Majoritarian states are commonly associated with first-past-the-post and single-member district electoral systems which afford 'single-party governments the mandate to adopt radical and comprehensive reform' (ibid, pp.189). Whereas, the proportional representation and multi-member constituencies of consensual democracies encourage coalitions and 'are more biased towards slow, incremental, disjointed, and negotiated patterns of policy…because many veto players that need to be accommodated' (ibid). Institutional mechanisms in consensus political systems facilitate greater access and participation in the political process (Crepaz 1996, pp.7). Executive power-sharing and a corporatist form of interest mediation are central pillars of consensus democracy which aim 'to facilitate inclusion and to provide access, accommodation and consensus among different political actors' (ibid). In contrast, majoritarian countries produce bare majority cabinets and have a pluralist form of interest intermediation (ibid). Majoritarian systems tend to 'create exclusive, strong, decisive and accountable parties and executives that are said to produce more 'responsible' public policies' (ibid). Therefore, majoritarian systems produce strong single party governments which has a dominance over power whilst consensus democracies produce coalition governments that have to balance a range of interests.

Another divide between the two political systems is based on the interest group mediation. Consensus democracies are generally corporatist and majoritarian systems are more likely to be pluralist. In pluralist systems there are a lot of interest groups competing for influence, in contrast in corporatist systems there are fewer groups and the ones that are present are larger and more encompassing. In consensus democracies policy making is more stable over time because of input from a greater variety of groups means 'a greater range of information will be taken into consideration ensuring a steady, long-term, and predictable policy style' (ibid, pp.8). In majoritarian systems (two-party) the swings in policy are larger as new parties enter and have less need to consult a range of groups (ibid). Denmark is a classic example of a consensus system and the UK an example of majoritarian system, whilst France fits into the latter category. Although, when there are threats to the system by outside forces, such as the platform economy, then the consensus system provides non-government actors with greater opportunities to influence the policy. Whereas, majoritarian government are in a better position to resist pressure to act. Therefore, the corporatist systems of consensus democracies encourage policy development in contrast to the pluralist system in majoritarian system that enable the government to resist pressure to act.

Therefore, this thesis utilises historical institutionalism as it is best able to explain the differing social policy development outcomes in the platform economy. This thesis does not look to contribute towards the path dependency approach as the platform economy challenge differs to that of retrenchment. By merging Skocpol and Pierson's theories a comprehensive analytical framework can be established. Policy feedback effects and formal political institutions are the pillars of this theory. Policy feedback effects impact: the interest and resources of interest groups, the preferences and experiences of policy makers and establish lock in effects. The formal institutions of the state determine whether a country is consensus or majoritarian which either facilitates policy action or inaction.

2.5. Conclusion

Overall, neither the first period nor the third period of social policy development theories are able to explain what has occurred in regard to the platform economy. The first period focused on the formation of the welfare state and so the theories are tailored to explain solely that phenomenon. Theories in the third period each have specific explanatory weaknesses, however the period as a whole is more focused on the change caused by internal dynamics relating to

existing policies. The platform economy was an exogenous shock providing a new social policy challenge. Historical institutionalism, of the second period, is the theory that has been best able to explain the social policy development for the platform economy. By merging Pierson and Skocpol's theories a strong theoretical structure is established of policy feedbacks. When combined with theories regarding formal institutions it has produced a coherent and convincing analysis framework.

This framework, and the definition of the platform economy identified in chapter one, will be used to develop a methodology to facilitate the systematic analysis of the social policy response to platform work. Chapter three presents the rationale for the research design selected for this thesis.

Chapter Three: Methods

The fourth industrial revolution is transforming the global economy along with the labour market. Platform economies have been at the forefront of this change. They are extremely mobile companies that are mainly based online. The new business model of platform companies has created new forms of work. Platform companies have challenged the employment categorisations associated with the traditional economy and the welfare systems that support workers. Despite the platform economy being nearly a decade old (Uber entered Paris in 2011 and London in 2012), there has not been a great deal of social policy development (Tsotsis 2011; Knight 2012). The majority of Western governments have adopted a laissez-faire approach. This approach has meant that officials have had to attempt to apply current ill-suited social protection policies to platform workers. This thesis aims to understand, analyse and explain why the majority of states have not developed social policies and why a few states have developed coherent systems.

3.1. Research question

Initial appraisal of the literature on the platform economy highlighted that there was a lack of peer reviewed studies on this topic due to the speed of change that had occurred in this area of the economy. The lack of academic research was a key determinant of the direction this thesis took. The lack of clarity concerning a definition of the platform economy required the explanation provided in chapter one and hence the importance of first clarifying terms. Moreover, emerging from the literature review in chapter two were a number of issues which will form the basis of this thesis' research. The literature review highlighted two questions that should be explored regarding social policy development for the platform economy. Firstly, how can the social policy development process for platform work be explained? Secondly, has this process produced social policy change? In addition, the dominance of Esping-Andersen's welfare regime categorisation (see section 3.4) called for an analysis into whether the social policy reaction to the platform economy had maintained welfare trajectory. From this exploratory assessment emerged the research questions that drove this study. Thus, the research questions are:

1. How can the governments' social policy response to the challenges of the platforms be explained?
2. Has social policy development for the platform economy followed the welfare regime of each state?
3. To what extent have the policy challenges presented by the platform economy triggered policy change?

For the first question, there is a need to understand the social policy process for the exogenous shock of the platform economy on the welfare state. The second question aims to clarify whether the platform economy has impacted welfare regimes in such a way as to fundamentally shift them away from their welfare trajectory type. The third question, in response to the focus in social policy to study policy change, asks whether the policy responses or inaction has led to policy change. Therefore, the lack of academic research on social policy responses to the platform economy drove this thesis to endeavour to provide a foundational analysis for peers to build from. The thesis will focus on clarifying and analysing the social policy development process and the response in order to better understand how governments have reacted to the platform economy and its challenges.

3.2. Research design

Selecting qualitative analysis

Academic analysis of the platform economy has been mainly quantitative demonstrating a need for qualitative research. Considerable quantitative research has been undertaken focusing on the economic impact of the fourth industrial revolution (Goos, Manning and Salomons 2009; Adermon and Gustavsson 2015; Degryse 2016; Nübler 2016). There have been economic analyses on wage fluctuations of platform workers and on the economic performance and potential growth of the platform economy (Berg 2016; Berg and Johnston 2019; Graham Hjorth and Lehdonvirta 2017). Although this research is valuable, the lack of rigorous qualitative analysis has left a significant gap in the understanding of the platform economy. The complexity of social policy in the platform economy means that only qualitative analysis will provide a coherent examination. The single example of academic qualitative research that has been carried out was by legal scholars (De Stefano 2016). In contrast, the majority of non-academic qualitative research has been carried out by private organisations, such as think tanks, or by government agencies or intragovernmental organisations. Analysing this research along

with mass media sources requires qualitative analysis to cross-reference claims and critically analyse information. Therefore, the significant gap in the academic analysis of the platform economy and the nature of social policy means that qualitative analysis should be utilised.

The research questions necessitated a qualitative approach in order to highlight the nuances and dynamics of the social policy development process and the policies themselves. Qualitative analysis is predominantly utilised in the social sciences in order 'to understand social life through the study of targeted populations or places' (Punch 2013, pp.32). The approach focuses on 'the qualities of entities and on processes and meanings that are not experimentally examined or measured (if measured at all) in terms of quantity, amount, intensity, or frequency' (Denzin and Yvonna 2005, pp.10). This form of analysis is suited to analysing the dynamics between different social groups and actors in the policy process which are not quantifiable. Qualitative analysis is a research strategy that 'emphasises words rather than quantification in the collection and analysis of data' (Bryman 2016, pp.36). Analysis focused on understanding whether policies are able to protect individuals in the labour market lends itself towards the use of words. Bryman provides three elements of qualitative analysis. First, qualitative analysis takes an inductive approach which is theory focused (ibid). Secondly, there is a rejection of the guidelines associated with scientific analysis and positivism 'in preference for an emphasis on the ways in which individuals interpret their social world' (ibid). As policy makers' actions are being analysed it is important to understand their preferences and how they see the world. Finally, social reality is taken as being ever shifting and emerges from an individual's own creation (ibid). This final element has been attested to already in the ever-changing nature of the platform economy and social policy. The three research questions in this study are focused on policy development process and policy outcomes which require a qualitative approach. Qualitative analysis gives this research the room required to carry out cross-national analysis based on a number of indicators, rather than focusing on a narrow area as is common with quantitative analysis. Therefore, the qualitative approach is best suited to researching the social policies, the social policy process and the related actor dynamics because of its flexibility, breadth and depth of analysis.

Inductive approach

This thesis has utilised an inductive approach to research, meaning that it has not been theory driven but rather the research process has taken precedence. When utilising an inductive process 'theory is the outcome of research' as the researcher draws 'generalisable inferences

out of observations' (ibid, pp.26). Inductive analysis is flexible allowing the researcher to reflect and theorise on data that has been collected and to return for further investigation to test the theory (ibid). This strategy is often referred as iterative, that is 'it involves a weaving back and forth between data and theory' (ibid). A process of continual back and forth between researching and reading and theorising has occurred which has allowed for the development of a coherent and strong analysis of social policy for the platform economy. The inductive aspect of qualitative analysis is key as it allows the research project to adapt as greater understanding of the issues in social policy development for the platform economy emerge.

Comparative analysis

At the centre of this thesis is the comparison between three welfare regimes: social democratic (Denmark), conservative (France) and liberal (UK). Comparative analysis differs from descriptions of cases that sequential present data. The latter has great value in understanding issues but is does not help in 'making the reader aware of differences and similarities' (Pickvance 2005, pp.1). In a sense all analysis is comparative as it attempts to find causes which involve comparison of what has happened and what might have happened in different circumstances (Smelser 1976, pp.160-2). There are two feature which define comparative analysis. First, is a desire to explain why similarities and differences exist between cases. Second, is the investigation into two or more cases 'according to a common framework' (Pickvance 2005, pp.2). There are two approaches to carrying out comparative analysis, those that seek 'to explain variation and those which seek to explain commonality' (ibid, pp.4). When seeking to explain commonality, a method of agreement is utilised which focuses on isolating factors which are common among cases (Mill cited by George et al. 2005, pp.392). When seeking to explain variation, factors are identified which differentiate the cases (ibid). This thesis will utilise both methods to explain Denmark's action and France and the UK's inaction regarding the platform economy. A key strength of comparative analysis is the ability of the researcher to introduce 'additional explanatory variables (or to allow variation in variables which take a fixed value in the initial case of interest)' in order to demonstrate that the relationship between cases are more or less general than before (Pickvance 2005, pp.4). A weakness is that it requires that terms, that can be vague, are consistent across cases and that 'the introduction of new variables brings with it the introduction of unknown variation too' (ibid). Yet, overall comparative analysis is an effective way to research multiple cases and to compare the social policy of these cases in regard to the platform economy.

3.3. Multiple case study analysis

At their core case studies are ‘descriptive, exploratory or explanatory analyses of a person, group, event, policy, project, decision, or institution’ (Anderson et al. 2014, pp.89). Case studies explore systems with boundaries through research ‘involving multiple sources of information, and reporting a description of themes’ (Baxter and Jack 2008, pp.58; Creswell and Poth 2007). Case study analysis affords researchers the opportunity to investigate in-depth ‘an event, an activity, a process, or one or more individuals’ (Creswell 2003, pp.15). As three national welfare systems are to be analysed the multiple case study will allow for analysis of all three. Case-study analysis can be quantitative or qualitative (Mohajan 2018, pp.11). The in-depth exploratory nature of case studies suits the qualitative inductive approach that is required to handle the complexity in the research into the social policy of the platform economy (Simons 2009, pp.21). Case studies are not used to test hypotheses, but hypotheses may be generated from case studies, suiting the inductive approach taken (ibid). Consequently, the case study method allows for a detailed analysis of multiple cases in order to obtain the analysis required to develop a convincing theory of the social policy development process (Gustafsson 2017). As Bryman highlights, the comparison between cases ‘may itself suggest concepts that are relevant to an emerging theory’ (Bryman 2016, pp.74). The multiple case study framework places the researcher in a better position to evaluate the ‘circumstances in which a theory will or will not hold’ (Eisenhardt and Graebner 1989, pp.546-7; Yin 2009). Therefore, the multiple case study allows for the use of comparative analysis of multiple nation states and is well suited to the qualitative inductive approach required for investigating social policy development for the platform economy.

3.4. Case selection

Esping-Andersen’s welfare regime typology sits at the centre of social policy analysis and is a touch stone for the vast majority of case studies regarding welfare states in the developed world. The theoretical framework is so pervasive that many scholars no longer explain it in their articles because they expect the reader to understand it. The categorisation is made up of three welfare regime types that differentiate the approaches taken to providing social protection to citizens. The differences are based on the amount of decommodification the welfare state provides to citizens. Esping-Andersen provides a definition of decommodification that occurs ‘when a service is rendered as a matter of right, and when a person can maintain a livelihood

without reliance on the market' (1990, pp.21-22). In contrast commodification means that citizens are reliant on the private market for social rights and services. The first welfare regime is the liberal welfare state whereby 'means-tested assistance, modest universal benefits, or modest social insurance predominate' (ibid, pp.26). Social protection is modest and focused on working-class and poor citizens with entitlement rules being strict and stigmatised (ibid). The state is focused on the market 'either passively – guaranteeing only a minimum – or actively – by subsidising private welfare schemes' (ibid, pp.27). Hence, the state 'contains the ream of social rights' minimising the decommodification effects of the welfare state which creates an 'equality of poverty among…welfare recipients' (ibid). The second welfare regime is the conservative regime which is less obsessed with the market. Rather the focus is on maintaining disparities in status and hence the state is reluctant to intervene (ibid). The social insurance model centres on the traditional economy of having one earner families and is closely linked with employment and the contribution made by workers (ibid). The social democratic regime is the third welfare regime and is focused on 'the principles of universalism and decommodification of social rights' (ibid). There is a demand for an 'equality of the highest conditions' in contrast to the conservative and liberal welfare states which tolerate inequality (ibid). Therefore, this model develops 'a universal solidarity in favour of the welfare state' because all benefit and all are dependent (ibid, pp.28). There is a focus on both work and welfare by committing to full employment and guaranteeing income. This means that the state must aim to 'minimise social problems and maximise revenue income' through high employment (ibid). There are competing welfare regime categorisations that could have been selected, most notability Lewis' breadwinner model, but this has not been used because the focus of this analysis is not solely on gender and Esping-Andersen's welfare regimes are best suited for cross European analysis (Lewis 2001). Overall, Esping-Andersen's welfare regime categorisation is central to social policy analysis and sets the framework to select the nation states for the multiple case study.

Four criterion were utilised in the case selection process in order to identify the most suitable countries to analyse. Firstly, the platform economy needed to have a significant presence in the cases. Secondly on demand appwork should predominate, not crowdwork. Thirdly, all the cases had to have significantly developed welfare states, which could be placed in Esping-Andersen's welfare regime categorisation. Finally, the states should have engaged with social policy discussions concerning the platform economy. The requirement of well-developed social policies excluded developing countries. Southern and Eastern European countries had

not engaged enough with social policy discussions concerning the platform economy to be included. The platform economy originates from the United States of America and has a significant presence in the country. However, the policy response in the United States has been at the state level and not the federal level and has been mainly concerned with market and safety regulation. The lack of social policy focus along with the difficulty in including a state in a federal system in a cross-national analysis excluded the United States. The European Union was excluded as it is not a single state and it has acknowledged that responsibility for developing social policy for the platform lies with member states (ibid). Consequently, the three cases chosen for this thesis were: The United Kingdom (liberal), France (conservative) and Denmark (social democratic). Each of these states are architypes of their welfare regime. These three states were chosen as they represent over half of the platform economy in Europe and so have a large platform economy in their economies (European Commission 2016, pp.3). Moreover, in comparison to other states they have been most active in regard to the platform economy. Even though only one country has carried out meaningful policy development, there has been lively debate regarding social protection in the platform economy in all three countries. Finally, all three countries have developed welfare states. Therefore, Denmark, France and the UK all matched the case selection criteria leading to their utilisation as the cases of analysis in this thesis.

3.5. Selection of the social policies

In order for the research to be more manageable, this thesis is focusing on three key social policies: unemployment insurance, pension and sick leave. These three social policies are the pillars of the welfare state protecting against the three main risks of unemployment. Firstly, unemployment insurance protects workers from unemployment as a consequence of rejection from the labour market due to lack of skill, economic recession or economic changes. Secondly, pensions protect workers from unemployment related to old age. Finally, sick leave provides a safety net against natural illness, accidents at work or outside of work. Therefore, unemployment insurance, pension and sick leave are the three key social policies that have been focused on in this research.

3.6. Data collection

The main source for analysis used in this thesis were documents. Document analysis is defined as 'a systematic procedure for reviewing or evaluating documents—both printed and electronic (computer-based and Internet-transmitted) material is the main source of data collection for the study (Bowen 2009, pp.27). As limited qualitative research has been carried out on the platform economy, there is a need to synthesise and analyse the non-academic research that has been undertaken. Consequently, no interviews were carried out in this thesis. Ethics is an important aspect of research, however, as no human participants were involved in the data collection it is not a concern for this study. Document types vary from letters to press releases and newspapers. Scott usefully distinguishes between personal and official documents and this research will utilise the latter (1990, pp.4-6). Three main types of document sources have been used. Official documents deriving from the state, which are a great source of information as it produces a vast amount of information. Examples of this type of document are official government publications and government-commissioned research. The second type are official documents deriving from private sources such as think tank reports, reports from international organisations and non-governmental research documents. This group also includes academic journal articles and books. The final group is the mass media. Document analysis allows for the collection of a wide range of information in multiple countries and to gain insight into the policy process by obtaining multiple perspectives. Further, due to the contemporary nature of this area of investigation, document analysis enabled the research project to stay up to date with new developments and changes related to the platform economy. Documents have also afforded insight into the positions and actions of key groups and individuals such as trade unions and platform companies. All attempts have been made to cross-reference and verify claims made in sources. Thus, document analysis was the most suitable form of data collection in order to research social policy developments in the platform economy.

A systemic process was utilised in the data collection. Research was carried out on a case by case basis. The same process was utilised in each case. In the first stage, all academic literature was collected and analysed on the platform economy. Considering the variety of terms that have been utilised to describe the platform economy, the search in all three cases focused on the following terms: platform economy, collaborative economy and sharing economy. Secondly, private documents were collected and analysed consisting of think tank reports, company analysis and charity reports. The third collection of data was of official documents

from governments but also regional and international organisations such as the International Labour Organisation and the Commission of the European Union. Lastly, information was collected from the mass media in the country. In each country the research focused on the five largest newspapers spanning the political spectrum in order to not bias the research (see table five). In addition, in the two non-Anglophone countries data was collected in the native language. The data was able to be collected by utilising the key terms in the native language. See table six for a full layout of the terms used in both French and Danish. As a French speaker only the Danish sources posed challenges, however, all comprehension of non-English data was checked by colleagues of native fluency. Therefore, the data collection was a systemic process allowing for comprehensive collection of information.

Country	**Newspaper**	**Website**	**Political orientation**
Denmark	Politiken	www. politiken.dk	Centre-left
	Information	www.information.dk	Centre-left
	DR (Danmarks Radio)	www.dr.dk	Centre (state owned)
	Jyllands Posten	www. jyllands-posten.dk	Centre-right
	Berlingske	www.berlingske.dk	Centre-right
France	L'humanité	www.humanite.fr	Left
	Libération	www.liberation.fr	Centre-left
	Le Monde	www.lemonde.fr	Centre
	Le Figaro	www.lefigaro.fr	Centre-right
	La Croix	www.la-croix.fr	Right
The United Kingdom	The Guardian	www.theguardian.co.uk	Centre-left
	The Independent	www.independent.co.uk	Centre
	BBC (British Broadcasting Corporation)	www.bbc.co.uk/news	Centre (state owned)
	The Telegraph	www.telegraph.co.uk	Centre-right
	The Financial Times	www.ft.co.uk	Centre-right

Table five: The newspapers utilised in each of the cases.

Country	Phrases searched	Translation
Denmark	Deleøkonomi	Sharing economy
	Platformsøkonomi	Platform economy
	Arbejdsløshedsdagpenge	Unemployment day money (unemployment benefit)
	Pension	Pension
	Pensionsopsparing	Pension savings
	Sygedagpenge	Sick day pay (sick pay)
France	Plateforme économique	Platform economy
	L'économie collaborative	Collaborative economy
	Protection sociale	Social protection
	L'assurance-chômage	Unemployment insurance
	L'auto-entrepreneurs	Self-employed
	Le travailleurs non salarié (TNS)	Self-employed
	L'indemnité de maladie	Sick pay
The United Kingdom	Gig Economy	
	Sharing economy	
	Platform economy	
	Collaborative economy	
	Unemployment benefits	
	Pension	
	Sick pay	
	Sickness insurance	

Table six: Terms utilised to research the platform economy in the three cases.

3.7. The limitations

Every attempt has been made to minimise limitations in this thesis. Although the multiple case study approach provides the thesis with generalisability, this is limited to Western European countries and more specifically to those that fit into the welfare regime categorisation. Further research could expand the focus to include crowdwork that is mainly carried out in the developing world. Additionally, the majority of data for this thesis comes from secondary sources and no primary research has been carried out. To reduce this limitation cross-referencing has been carried out at all possible opportunities to confirm the validity of claims made, especially of non-academic data. In order to build on the findings of this thesis, interviews could be carried out with key actors in the policy making process in each case. Another limitation is that only one individual carried out the research which risks researcher bias but to minimise this the data analysis was carried out systematically using discrete categories.

3.8. Conclusion

Overall, three clear research questions were identified from exploratory research and a review of the literature that focused on social policy development for the platform economy, welfare regime trajectories of the development and whether social policy change has occurred. A qualitative approach best suited the research questions in order for the dynamics of the policy development process to be identified. The data collection focused on Denmark, France and the UK, because they fit the selection criterion. The data collection process was challenging due to the lack of previous investigation which required considerable research in multiple languages in order to ensure that the findings were comprehensive. The findings present a complex picture of differing social policy development trajectories taken by the cases which will be presented in chapter four.

Chapter Four: Findings

The data collection process presented complex material to analyse. In order to present a coherent set of findings this thesis will follow a set structure for comprehension and to allow for the reader to easily compare cases. The findings will be presented on a case by case basis starting with Denmark, France and then the UK. Within each country findings related to each of the three main social policies will be presented separately beginning with unemployment insurance, then pensions and finally sick leave. All findings in each social policy section will be presented in a chronological manner to display the policy development process. The data collection process revealed that an understanding of the specific social policy development and administrative process of each country. Hence, an overview of each system will be presented prior to the social policy findings. A summary table will be presented at the end of the chapter (see table eight). Overall, the findings of the research suggest that two differing trajectories have been taken in relation to social policy development for the platform economy. Denmark has developed a response in all three social policy areas increasing protection for platform workers. In France and the UK, the overwhelming trend has been inaction. Consequently, platform workers remain either completely unprotected or have subpar social policy coverage.

4.1. Denmark

In Denmark, there have been significant developments in all three social policies in Denmark. Both politicians and unions acted promptly to ensure platform workers have unemployment insurance and pension coverage. For pensions, in spite of platform companies being unwilling to engage in social dialogue, many unions developed plans tailored for platform workers due to the welfare system affording union's significant power in implementation. The unemployment insurance was reformed after a tripartite collaboration produced policy recommendations leading to platform workers having greater and easier access to this important social policy. There has been greater difficulty in ensuring platform worker receive sick leave, however the new collective agreement between Hilfr and 3F has established a model of how this benefit, among others, can be provided. The collective agreement is setting the path towards the continuance of the Danish model and the provision of comprehensive social protections to platform workers. Therefore, policy has been developed in each of three key

social policies for Danish platform workers making them some of the most secure workers in the platform economy.

The welfare system of Denmark

In Denmark unemployment insurance provision is carried out through the Ghent system. The Ghent System is the 'state-subsidised, but voluntary unemployment insurance administered by unions' (Vandaele 2006, pp.647). In this system the unemployment insurance fund, where benefits come from, and union membership are put together as one (Kjellberg and Ibsen 2016, pp.282). The Ghent system is well established in Denmark having been implemented in 1917 demonstrating how deeply embedded in it is in the Danish welfare state (Hadjú 2013, pp.265). Government legislation structures unemployment insurance by setting the rules, regulations and eligibility. Although, there has been an increase in independent unemployment funds which allow for protection without union membership, yet the vast majority of unemployment insurance is administered by unions (Vandaele 2006, pp.647). The Ghent system places unions at the heart of unemployment insurance provision which provides them with a great deal of resources in the unemployment policy making process. Historically, unions are consulted on the reform and adoption of new legislation. Therefore, the Ghent system means that unemployment insurance is largely administered by unions with the government establishing the parameters.

Collective bargaining is the second pillar of social policy provision as the agreement lays out what benefits employees will receive and how those benefits will be financed. Collective bargaining is the negotiation between unions and employer associations regarding wages and conditions of employment. Vandaele highlights the centrality of collective agreements in Denmark, stating that they 'account for a significant part of the labour market regulation' (ibid). Labour market regulation takes place through recurring national bargaining rounds at the sector level (Due and Madsen 2008, pp.516). Agreements between the Danish Confederation of Trade Unions and the Danish Employers' Confederation, two of the biggest unions, and employer associations represent over half of the private labour market (ibid). The current Danish collective bargaining is referred to as centralised decentralisation and came about in the 1990s. Centralised decentralisation modified collective bargaining allowing for greater negotiation at the enterprise level as opposed to the sector level, weakening the union's influence (Anderson et al. 2017, pp.56). Yet, the loss of power has been small in relative terms and unions retain significant power. All the benefits laid out in collective agreements are administered by unions

providing them with significant control. The historical responsibility gives unions influence within the Danish system. Due and Madsen emphasise this influence by stating that 'the Danish model is still one of the most strongly founded industrial relation (IR) systems in the world' (Due and Madsen 2008, pp.516). These union-controlled mechanisms are especially important in Denmark as government social policy legislation is less and because there are 'no central laws or tripartite concertation governing…social dialogue' (Ilsøe and Madsen 2018, pp.15). Therefore, collective bargaining agreements are central to social policy provision in Denmark and unions sit at the heart of this process.

The final source of influence for unions is their institutionalised role in policy making. It has been a long-term policy in Denmark for unions and other interest groups to sit on government committees to debate policy. In 2005 39/45 Danish government committees had unions on them (Christiansen et al. 2010, p.31). Composton highlights 'the important role unions played in the policy-making process' in Denmark (1995). Unions have had a long history of being involved in welfare state reforms. Labour market partners have influenced social policy reforms by being 'part of labour market commissions that prepared reforms and…played a significant role in the implementation process of these reforms' (Jørgensen 2003). Therefore, Danish unions have power resources stemming from their historical institutionalised role in policy making. In the context of the platform economy, unions have been central in the government's discussions regarding the future labour market and the challenges of digitalisation. Unions were key actors in the Disruption Council and in the policy discussion on how to increase coverage of the unemployment insurance system to new types of workers.

Unemployment insurance

With the arrival of the platform economy, unions followed the Danish model and attempted to engage in social dialogue with platform companies in order to develop a collective agreement. Unions did not accept the claim by platform companies that they were not employers and so platform workers were self-employed (see table seven for employment categorisation). Lizette Risgaard, then chairmen of LO (now merged into The Danish Trade Union Confederation), signalled her intention for LO to engage with platform companies in 2015 (Information 2015). However, platform companies followed the same tactics as they had used in other countries and were staunchly against being viewed as an employer. Union leaders were vocal about their attempts at social dialogue with platform companies, speaking with Berlingske, Information and Borsen, to demonstrate that platform companies did not have an interest in adhering to the

Danish system (the Ghent system). At no point did unions turn to the courts, which is likely because of their centrality in Danish policy-making and the swiftness of action from the government. Therefore, platform companies were unwilling to engage with social dialogue let alone collective bargaining leaving platform workers struggling to access unemployment insurance.

Country	Employment categorisation	Description	Platform Workers
Denmark	Employee (medarbejder)	Definition is set by collective agreements at the sector level. The work relationship must have subordination.	Hilfr workers after 100 hours, if they choose to become an employee.
	Self-employed (Selvstændigt erhvervsdrivende)	Tax administration decides if an individual is self-employed. An individual who does not receive a salary and does not have an employer.	All platform workers
France	Employee (salarié)	Tripartite categorisation of control: the power to direct, power to control and power to sanction.	Platform couriers.
	Self-employed (travailleur independent)	The worker should be free to accept or reject work, decide their working hours and not be given instructions nor be able to receive sanctions	
	Self-employment subcategories:		
	• Micro-entrepreneurs	A self-employed worker who has opted for a simplified tax regime.	The majority of platform workers
	• Entrepreneur etudiant	Student or graduate under the age of 28 years who has opted for this category to get business support.	Available to young platform workers.
	• Artisan/commerçant	An independent worker carrying out mainly manual work and has less than ten employees.	Deliveroo riders were placed into this category before the Supreme Court ruled they were employees.
United Kingdom	Employee	An employer has control over the individual, the employee is integrated into the business and there are contractual obligations.	None.
	Worker	Individuals share the same characteristics of the self-employed but provide 'a service as part of someone else's business'	Uber drivers.
	Self-employed	Individuals in a business for themselves and enter into contracts with clients or customers to provide work or services for them'	The majority of platform workers

Table seven: Employment categorisations in each case study.

Shortly after the election of the Liberal coalition, and the failure of social dialogue attempts, the Danish Government established the Disruption Council in November 2016 in order for Denmark to best harness technological development in the economy. The Council is chaired by Prime Minister Lars Løkke Rasmussen, empathising the importance of this council to the government (Ilsøe and Weber Madsen 2018, pp.20). The Disruption Council aims to 'make Denmark ready for the future and take advantage of the opportunities created by robots, artificial intelligence and new business models' (Ministry of Employment 2019). But also, to ensure the 'security they [Danes] rightly expect' in the workplace (ibid). The council is tripartite made up of relevant ministers, business executives, experts regarding technology and innovation, university professors and trade union leaders (ibid). The Disruption Council will

meet eight times in total, in different locations in Denmark, where the following five topics are to be discussed: New technology and business models, Competences for the future, Free trade and foreign workers, Contemporary, flexible and favourable business conditions, Flexicurity 4.0 (Priesler 2018). Importantly for this thesis is the focus on flexicurity, one of the pillars of the Danish welfare state. It demonstrates that a focus of the Disruption Council was building a modern welfare state capable of coping with technological change (Toft 2017). The Disruption Council was established instead of the issues being discussed in committees because technological change is having, and will continue to have, such a significant impact on so many areas of society. The Disruption Council is not simply a forum but also develops policy recommendations. Therefore, the Disruption Council is indicative of the Danish approach of engaging with new challenges presented by technological change. The council was an important area for discussing welfare related issues concerning the platform economy and has been key to policy discussions in all three of the major social policies.

In the same year as the establishment of the Disruption Council, the working group on self-employed in the unemployment benefit system (Arbejdsgruppe: Selvstændige i dagpengesystemet) was set up. The working group was established because the unemployment system was unable to deal with new forms of work and working patterns, most notable the platform economy (Ministry of Employment 2017b). There was confusion regarding how platform work should be treated and whether platform work could be counted in contributions to unemployment insurance. In October 2015, a cross-party coalition passed legislation to reform the unemployment system to better suit the economy that employees faced (Ministry of Employment 2016). The working group consisted of civil servants from the Ministry of Employment, and the Ministry of Tax, government officials, six participants from the social actors (unions and employer associations – three each) (ibid). The aim of the working group was to develop policy recommendations in order to create 'a new unemployment benefit system that can embrace new forms of employment to a greater extent' (ibid). A year later in April 2017 the working group produced its findings. The first recommendation was a change of focus to income-based earnings rather than focusing on the type of work (Ministry of Employment 2017a). All forms of employment should be able to contribute towards unemployment insurance (ibid). Secondly, a simplification and digitalisation of cessation of employment, no matter the types, making it easier to change jobs and continue to contribute towards unemployment insurance (ibid). Finally, the digitalisation of unemployment insurance contributions and calculation of the required contribution based on income (ibid). Therefore,

the working group on self-employment in the unemployment benefit system was quickly established after the existing system could not deal with platform work. The working group was tripartite, with unions and employer associations having considerable influence on the recommendations

The recommendations from the working group were passed into law in the same year. In December 2017 the Danish Parliament passed the law on a new benefit system for the future labour market which amended the Unemployment Insurance Act by a majority of 97 to 7 (Folketinget 2017). The new law harmonised the rules for self-employed and atypical workers with those of employees' which had been reformed in October 2015 (Regeringen 2017). The law made it easier to contribute whilst having two forms of employment, such as one as an employee and the other as a platform worker (Folketinget 2017). The focus of the calculation of insurance contributions has shifted from the workers status as employed or unemployed to their activity of earning (ibid). The new system makes it easier for platform workers to report earnings digitally in order for their unemployment benefits to better reflect the work they have done, which is vital for claiming benefits if unemployed. These reforms have made it considerably easier for platform workers to access unemployment benefits as the type of work is no longer relevant as the system is based on income. The reform also digitalised the unemployment insurance system making it easier to contribute and see one's earnings that are being registered (Regeringen 2017). Thus, the unemployment insurance reform removed the barriers platform workers faced in developing accessibility to unemployment insurance and being covered if they fall out of work.

Pension

The development of pension plans for platform workers was the first major development of social policy. After platform companies' unwillingness to engage with social dialogue, unions focused on areas where they were able to provide solutions without collective bargaining. Unions drove the collaboration process with private pension companies to create pension plans for self-employed without employees (solo-self-employed). In 2016, fourteen unions came together and established the 'Medlems Plus' pension plan in collaboration with PFA, the largest pension company in Denmark (HK 2016). It is similar to the pension offered by the state with low administrative costs, attractive interest rates and insurance packages (ibid). In 2017, ten public sector unions established a plan with the pension company PKA (Ilsøe and Weber Madsen 2018, pp.22). In same year, the insurance company Alka created a HK Freelancer

insurance in collaboration with the Union of Clerical and Commercial Employees in Denmark (HK) (ibid). It includes a company insurance, insurance of health and safety and accidents, and is also targeted at platform workers because of a very low cost. In order to access the pensions a platform worker must be a member of a union allowing unions to increase membership and protect workers. The pension schemes provide platform workers with flexibility to carry out solely platform work or to combine contributions through multijobbing (ibid). Therefore, unions were proactive and utilised their position as a provider of social protection policies to develop pension plans for platform workers.

Sick leave

The development of sick leave has been slower than the other two social policies. Sick leave is normally included with collective agreements and the employer contributes towards this insurance. There is difficulty in providing this benefit because platform workers remain categorised as self-employed and platform companies are unwilling to engage in social dialogue. However, in April 2018 Hilfr, the cleaning platform, broke this trend and engaged in government supported social dialogue with the union 3F (Fagligt Fælles Forbund, the United Federation of Danish Workers) (Alhberg 2018). As a result, Hilfr concluded a collective agreement with 3F which was the first of its kind in the platform economy in Denmark and across the advanced world. The agreement means that Hilfr assumes responsibility as an employer with the cleaners having the choice to become employees after 100 hours of work through the platform, or they can continue to be 'freelancers' (ibid). The agreement set a tariff (hourly pay) for the cleaners to receive at 141.21 Danish kroner and they are entitled to sick leave, holiday pay and pension contributions (ibid). Moreover, the agreement 'contains rules on notice periods if Hilfr or the cleaning agent wishes to terminate the employment' (ibid). It is a pilot agreement that runs from 1st August 2018 and 'is to be evaluated by the parties after twelve months' (ibid). This agreement is based on the voluntarist model that has been vital for Denmark. Most importantly, the agreement required Hilfr's willingness to comply and engage in social dialogue. Hilfr, a Danish platform company, was not interested in attempting to undermine the Danish welfare state. Nicolai Søndergård Kjær from Hilfr stated that 'it was never part of our business model to undermine the way we go about things in Denmark' and that the company wanted to provide flexible employment that 'respects the Danish model' (Fagbevægelsens Hovedorganisation 2018). Although the agreement only covers Hilfr workers, it is vital in setting an example of how platform companies can be integrated into the universalistic social democratic model of Denmark. Therefore, despite social policy

development taking longest for sick leave, the Hilfr/3F collective agreement was a ground-breaking development for platform workers.

Overview

There have been significant development in all three social policies in Denmark. In spite of platform companies being unwilling to engage in social dialogue many unions have developed pension plans tailored for platform workers. The government has been committed to developing public policies to match the changes taking place in the labour market as a result of technological development. Tripartite collaboration was utilised to modernise the unemployment insurance system, making it more accessible and understandable for platform workers. Finally, the new collective agreement between Hilfr and 3F was the first step in providing sick leave to platform workers. The agreement has delivered a framework for collective agreements in the platform economy and so the expansion of social rights to platform workers. It has laid the path towards the continuance of the Danish model and the provision of comprehensive social protections to platform workers. Thus, Denmark has carried out significant social policy developments in all three social policies, significantly social protection for platform workers.

4.2. France

No relevant meaningful policy has been passed by the French government as platform workers were smoothly placed into the outsider category in the dualised labour market. Platform workers have received little support from traditional unions because of their outsider status. The French government has been aware of the risks associated with platform work for a number of years having commissioned numerous reports. Consequently, the social policy surrounding platform workers is very complex. Platform workers are unable to claim state unemployment insurance because they are self-employed (see table seven for employment categorisation). As a result of this employment categorisation they are not covered by a collective agreement providing unemployment protection. There is a government pension scheme that platform workers can register for, but they must proactively join and are allowed to opt out. The probable low contributions of platform workers due to their low pay means the pension will likely be insufficient. The sick leave system is similar, requiring platform workers to actively register and allowing them to opt out. Once again, the pay-out is likely to be low. Platform couriers stand as the sole group with full social protection after they were ruled to be employees.

The French welfare system

The French welfare system reflects the conservative welfare state as 'entitlement is conditional upon a contribution record, most benefits are earnings related, financing is provided mainly by employers' and employees' contributions, and the social partners have long been highly involved in the management of the system' (Hassenteufel and Palier 2016, pp.60). Consequently, collective agreements are important to social protection provision. However, the government is more involved in social protection provision than in Denmark. Another key determinant of access to social protection is employment categorisation. Workers categorised as employees can access significantly higher benefits, both from the government and from collective agreements, compared to the self-employed. Employment categorisation determines where the responsibility lies for organising social benefits. Therefore, employment categorisation and collective agreements are key in determining access to social benefits which are facilitated through the government and unions to a lesser extent.

A core component of the French labour market and welfare system is dualisation. Dualisation is a process whereby 'policies increasingly differentiate rights, entitlements, and services provided to different categories of recipients' (Emmenegger et al. 2012, pp.10). Dualisation has occurred most in conservative welfare regimes where social rights are closely related to employment and collective agreements (Thelen and Palier 2010; Emmenegger et al 2012). More specifically, there is an insider group of workers who have high social protection, normally associated with traditional industrial types of work, and an outsider group of workers who have lower social protection coverage and are more flexible (ibid, pp.12). A significant section of the French labour market is made up of outsiders who are more flexible and have less social protection (Thelen and Plaier 2010, pp.121). Within the dualised labour market platform workers, categorised as self-employed, fitted perfectly in the outsider category. Therefore, platform workers were unlikely to be able to access the good quality collective agreements of insiders.

Unemployment insurance

The French government recognised that the digital economy provided both opportunities and challenges and produced numerous reports. In 2014, the French Ministry of Labour assigned the National Council for Digitalisation (NCD) with the task of discussing several specific problems related to digitalisation (Weber 2018, pp.419). The council recommended the

utilisation of contracts for so-called 'travail en temps partagé', which have existed in France since 2005, in order to increase flexibilisation within companies. As self-employed workers, this contract would not work for platform workers. No meaningful policy suggestions have come out of the NCD in regard to social protection in the platform economy. The earliest identification of the issues related to the platform economy was a 2015 France Strategie report stating that the platform economy was contributing towards the trend of work casualisation in France (Aboubadra, Argouarc'h and Bessière 2015). One of the most notable actions taken was The Mettling Report: Transformation Numérique et Vie au Travail that was requested by the Minister for Labour, Employment, Vocational Training and Social Dialogue in 2015 to look at the effects of digital change on the labour force (Mettling, 2015; Donini et al. 2017, pp.219). The report highlighted the 'need to implement effective strategies' and greater social dialogue between trade unions and employers' organisations' in regard to applying laws to digital workers (Mettling 2015, pp.22). Hence, there was early action and recognition of the inadequacy of social protection currently provided to platform workers. However, no meaningful policy developments came of this report for unemployment insurance or any social protection.

The most important report on social protection for platform workers came from the General Inspectorate for Social Affairs (Inspection Générale des Affaires Sociales, IGAS) in 2016 and was written by Amar and Viossat. The report provides a detailed overview of the digital work in France, highlighting that the border between employment categories are blurred as well as the borders between paid and unpaid work (Amar and Viossat 2016, pp.156). Amar and Viossat stated that there are more employees in platform work than one might believe but that temporary task-based work is still uncommon in France (ibid, pp.58). They also recognised that platform work was heterogeneous which, under the current French system, could make it hard to determine their employment status (ibid). The report also noted that platform companies were trying to avoid being defined as employers as they saw themselves as technological intermediaries (ibid, pp.57). In France, an individual is employed if there is a subordination relationship between the employer and employee and the employer has: the power to direct, power to control and the power to sanction (ibid, pp.52). To be categorised as self-employed the worker should be free to accept or reject work, decide their working hours and not be given instructions nor be able to receive sanctions (ibid). The IGAS report states that some platform companies do not fall outside these criteria and hence are employers and should be providing unemployment insurance, pension and sick leave. Online platforms are aware of this risk and

have been utilising contractual clauses (usually in the terms and conditions of the apps) to protect themselves from being qualified as employers (ibid, pp.109). The report recommended the 'clarification and harmonisation' of the employment categorisation to better suit platform work (ibid, pp.89). Also, the report called for a more automatic and digital system to report earnings and make social protection contributions to unemployment insurance (ibid, pp.100). These recommendations are modest but demonstrates that the government was aware that platform workers have low social protection. Therefore, the IGAS report highlighted the social policy challenges posed by the platform economy.

The French government launched the compte personnel d'activité (CPA) in 2017 which aimed 'to prevent breaches in the rights of the employable, for example when changing from being employed to solo self-employment or other forms of employment' (Weber 2018, pp.426). French citizens can collect points in their account, for example through work activity and government institutions can award points (ibid). These points can be used to access benefits, such as 'to set towards educational activities, financial assistance for business formation, or leave for family obligations or social commitments (ibid). Moreover, the points are not lost if the employment status changes or unemployment occurs (ibid). However, the CPA does not provide comprehensive coverage for any of the three key social policies and so is of limited use to platform workers. Therefore, the government responded to the IGAS report with the CPA which did not help platform workers in unemployment insurance or pensions and sick leave.

Despite the IGAS report, no meaningful changes have been made to the unemployment insurance system which remains insufficient and complex. The current situation in France is a complex one because of the unwillingness of the government to act with multiple self-employment categories, which only helps to further confuse the situation. There was debate over introducing a new status of worker intermediate between employee and self-employed. The labour inspectorate examined the idea of introducing a new status but deemed that it would not be needed, as 'the existing models should already cover the activities and relationships found in the platform economy' (Lenaerts and Beblavý 2017, pp.5). Self-employed workers in France are classified as *travailleur independent*. However, within this category of workers there are many different groupings. The majority of platform workers are defined as *micro-entrepreneurs* (formerly auto-entrepreneurs before 2018) which provides greater flexibility to opt out of social protection schemes (Forde et al. 2017, pp.14). Thus, micro-entrepreneurs can

opt out of paying for pension and unemployment benefit. Another category that younger platform workers could fall into is the *entrepreneur etudiant* which was established to enable students to work or set up a business during their studies (ibid). Once again students in this category can opt out of social contributions. Despite the large range of self-employment categorisations, platform workers are all treated the same in regards to unemployment insurance.

Platform workers are categorised as self-employed workers which means they are excluded from accessing unemployment benefits (Akgüç 2018, pp.9). Self-employed workers in France are not allowed to contribute or access the unemployment benefit scheme leaving platform workers at great risk of not being able to support themselves if they cannot find work on their chosen platform. The government suggest that self-employed workers can take a job-loss insurance contract from a private insurance company (Centre des Liaisons Européennes et Internationales de Sécurité Sociale 2019). However, there is no information provided by the French government on how to take out a private insurance programme and they come at greater costs making them unattractive for low paid platform workers (ibid). The insecurity related with platform work means that this section of the labour market is especially vulnerable to underemployment or unemployment. Yet, platform workers are not able to access any government run unemployment insurance. Therefore, platform workers have no right to unemployment insurance in France.

Pension

Traditional unions were not interested in supporting platform workers leading to the establishment of a number of sector-based platform unions. Platform unions have pushed for changes in social protection both through direct action and through the courts with only one major success. One of the most active unions has been SCP VTC (Syndicat des Chauffeurs Privés), the union for platform drivers, which has held a number of protests. There are smaller unions established in the bike courier industry (Akgüç 2018, pp.2). In France, the main platform union is CLAP (Collectif de Livreurs Autonomes de Paris) which 'rallies independent workers doing delivery tasks for aforementioned delivery platforms' (ibid). Attempts at social dialogue have been made by these platform unions but platform companies have been unwilling to engage. Social dialogue has only occurred once after forceful demonstrations from SCP VTC led to government supported negotiations between Uber and SCP VTC (ibid). However, those discussions collapsed as Uber would not accept a tariff (hourly wage) and did

not propose an alternative agreement (Le Parisien 2017). Although Uber did unveil a Europe wide policy of automatic pension provision to all its drivers increasing social protection for this group (Espadinha 2018a). The larger unions with more resources and political influence have been unwilling to support the smaller platform unions. A member form SCP VTC stated that the large unions had done little to support them and were only interested when success was nearby and they wanted to claim credit (Akgüç 2018, pp.20). Therefore, unions have been active in trying to claim social rights but have not been able to engage meaningfully with platforms as they do not see themselves as employers. The larger unions have been slow in supporting platform workers.

There is not a tailored pension scheme offered by the state to platform workers. Platform workers can access a government pension scheme, but it is a complex process. If platform workers fall into the micro-entrepreneur category the platform worker's contributions are calculated directly on the basis of the turnover the individual declares. They must earn at least €12,000 a year to get credit for their contribution over the year (Lhernould 2018, pp.10-12). Hence those combining platform work and other jobs may struggle to get over the base limit. Another option available to platform workers is to 'opt for the payment of minimum contributions' (Bpifrance Création 2019**)**. With this system there are no minimum contributions or minimum working hours, rather the platform worker must contribute a flat rate 22.7% of their income to the pension scheme (Lhernould 2018, pp.10-12). The money accrued is then utilised to calculate the pension pay-out when retired. In France, median pay in the platform economy is 54.1 per cent lower than the national hourly minimum wage, the highest observed gap followed closely by the UK (46.8%) (Forde et al. 2017 pp.49). All of these contributions go through the same system called the Régime Social des Indépendants (RSI) (ibid, pp.15). Within this programme, platform workers can contribute towards pensions and sick leave. However, there are two main problems: the opt out option and low contributions. Firstly, platform workers must proactively complete all the necessary paperwork and registration to access a pension. Without automatic registration the opt out option means that having no pension plan is the default setting. Even if platform workers are aware of the pension plan, they may choose to not to register given the low pay they receive and their wish to not 'lose' income. Secondly, RSI benefits are based on contributions, meaning the greater one contributes the more one receives when retired. Yet, platform workers receive low wages and have unstable working hours so can only contribute a low amount preventing them from building an adequate fund to rely on in the future (ibid pp.16). The lack of contributions from platform companies,

as they are not employers, means that the gulf in social protection in real terms between platform workers and employees is large. Moreover, multijobbing platform workers cannot combine contributions from each of their jobs making calculating pensions difficult (Legal Place 2019). Consequently, it is likely that platform workers may end up claiming the means-tested benefits for those over 65. The Solidarity Allowance for the Aged (l'allocation de solidarité aux personnes âgés) is available to those who are not receiving any old-age benefits and have annual earnings of less than €9,998.40 (€15,522.54 if applying as a couple) (Schoukens et al. 2018, pp.230). This benefit is very low especially compared to the pensions of employees and insiders. Therefore, the majority of platform workers in France can access a pension scheme in theory, however the low contributions and the opt out has led to most platform workers likely to have little or no pension.

Sick leave

The courts have been active in defining the social rights, especially sick leave, of some groups of platform workers in specific companies. Originally the courts ruled that Deliveroo drivers fell into the artisan/commerçant self-employed definition (Schoukens, Barrio and Montebovi 2018, pp.228). This afforded them sick leave if hurt on the job. However, in a landmark ruling at the end of 2018 involving food couriers and the platform Take Eat Easy, the French Supreme Court rejected 'the claim on the basis that there were no exclusivity or non-competition obligations, and the rider could decide on their own working hours, or even decide not to work' (Devernay, Fielder and Ivey 2018). The court overturned the previous ruling and held that food courier riders are employees (ibid). The decision was justified on the basis that the app used a geo-tracking system to monitor a rider's position, and record the number of kilometres ridden, and the company held disciplinary power over the workers (Goury 2018). This judgement means that all platform courier riders are now entitled to not only sick leave but full social protection, and courier platform companies must contribute towards unemployment benefit and pensions as well. However, the court judgements have not been consistent. A second ongoing court case regarding the social protection of platform workers is between SCP VTC and Uber. Up until now VTC drivers' claim to be employees has been rejected by employment tribunals, but SCP VTC is now more hopeful considering the Supreme Court ruling on food couriers. Yet, at this moment VTC drivers are micro-entrepreneurs. Therefore, the courts have lacked consistency in their approach to defining the status and thus social rights of platform workers mainly due to the government not taking action to clarify the situation. Courier riders standout as the sole group with comprehensive social rights due to their categorisation as employees.

Platform workers still defined as self-employed can access sick leave through the RSI. The scheme is similar to pensions with platform workers' contributions determining the level of pay out and an opt out option available. Consequently, the scheme suffers from the same failings as the pension policy as platform workers are unlikely to be enrolled, and even if they are the pay-out will be low. If platform workers are not covered under this scheme they must wait a year before receiving daily benefits 'in the event of illness or accident at work' (Abdelnour and Bernard 2018, pp.120). This is a significant period of time for platform workers to go without support especially as they cannot access unemployment benefit. However, Uber recently announced that it will provide a sick leave to its drivers across Europe and Deliveroo covers its riders if they are unable to work due to a workplace injury (Gore-Coty 2018). VTC drivers are thus covered if they are injured at work but not if their illness is nonwork related. Therefore, the current sick leave system is not effective. Platform workers are unlikely to sign up because of the opt out option and they will not accrue a high pay-out due to low contributions. Although, food couriers are covered for sick leave and have full protection as employees.

Overview

Therefore, the current social policy surrounding platform workers is very complex. The French government has been aware of the social protection challenges of platform workers but has not acted. Moreover, traditional unions have been unwilling to support platform workers in their effort to obtain social rights because of their outsider status. Platform workers (apart from food couriers) cannot access unemployment insurance because they are categorised as self-employed. Platform workers can access a government pension but the opt out clause leads to many not having a pension, and even if they do the low contribution will make the plan insufficient for retirement. Once again, a similar sick leave programme is available for platform workers but it suffers from the same weakness as the pension programmes. Although Uber drivers now have sick leave due to a change in company policy and platform courier drivers are fully protected as the Supreme Court ruled they were employees. Therefore, the vast majority of platform workers in France have little or no social protection coverage in all three of the main categories.

4.3. The United Kingdom

Social policy development for platform workers has been minimal in the UK with the government having taken no meaningful action. British social protection is means-tested and provides bare subsistence support to claimants. Platform work fits smoothly into the gig economy as a low cost, low protection and flexible source of labour. Unusually, the UK has three employment categories: employee, worker and self-employed but platform companies have continued to argue that platform workers should be in the latter category and are not workers (see table seven for employment categorisation). Platform workers and gig workers have established their own unions that protested and went on strike mainly to prevent further erosion of their social rights, or in an attempt to be paid the minimum wage. Traditional unions have campaigned for greater social protection for gig workers and the new unions' efforts. The courts have been most active in defining the social rights of platform workers, but the lack of clear legislation has meant that judgements have been uneven. Uber drivers have been defined as workers and thus gained the right to the minimum wage, autoenrollment in pensions and holiday pay. Deliveroo workers lost in their effort to gain worker status. The government did initiate the Taylor Review in 2016 to look at the gig economy and what could be done to provide more protection to this section of the labour force. However, no meaningful social development has followed. Platform workers do have access to unemployment insurance, if they are able to prove they have been employed, but the payment they will receive is low and only comprehensive for one year. Also, platform workers can access the state pension as long as they have actively arranged to contribute national insurance payments. However, the British state pension payments are small and the low contributions of platform workers makes it unlikely that they will receive sufficient support in retirement. Finally, platform workers are not entitled to sick leave regardless of whether they are a worker or self-employed, unless they drive for Uber. Therefore, no meaningful social policy development has occurred in the UK. The support that platform workers can access is likely insufficient and so platform workers have low social rights.

The British welfare system

The British welfare system is state-centric with collective agreements having a more minor role. Collective bargaining coverage is low with 29% of all UK employees being covered by an agreement and in the private sector the number is less than a sixth (Fulton 2013). The UK follows the liberal welfare typology with a commitment to ensuring that the free market is the

guarantor of financial security. Especially since the 1980s successive governments have focused on making 'living on state benefits less attractive' in order to 'prompt an earlier return to work' (Glennester 2009, pp.686). Unions do not play a significant role in social policy development or administration with only 23% of the labour force in unions (Department for Business, Energy and Industrial Strategy 2016, pp.5). The state provides means-tested benefits for the poor and encourages citizens to utilise the private market for social protection such as pensions (Esping-Andersen 1990, pp.26). Therefore, the British welfare state is mainly focused on providing for the poor and has a commitment to utilising the private market for security.

The UK is unique among the three cases as it already has a third category of employment outside of the employee/self-employed dichotomy. There is no one clear definition of employee in Britain as four tests are used. The control test aims to establish whether the employer has control over the employee and the integration test looks to establish 'to what extent the work provided is integrated into the core activities of the business' (Garben 2017, pp.36). The economic reality test aims to clarify if the individual is in business on his or her own and the mutuality of obligation test looks to see 'if there are ongoing contractual obligations to provide and perform work' (ibid). If none of these tests apply to the individual, then they cannot be an employee. Employees have statutory sick leave, their employer automatically enrols them in a pension scheme and they are eligible for unemployment benefit from the state if they do not have personal savings less than £16,000 (British Government 2019d). Self-employed workers are defined as 'in a business for themselves and enter into contracts with clients or customers to provide work or services for them' (Balaram, Warden and Wallace-Stephens 2017, pp.43). They can also be called independent contractors (ibid). Self-employed workers have less social protection than employees. The third category of employment is referred to as a worker or dependent contractors and are registered as self-employed but provide 'a service as part of someone else's business' (ibid). Importantly, they 'must carry out the work personally, rather than being able to send someone in their place' and the contract they have is not directly with the client but with a third party, such as platform workers (ibid). One of the most significant differences is that workers are required to be paid at least the national wage (ibid). Also workers must be provided with holiday pay. However, platform companies were staunch in their commitment to categorise platform workers as self-employed and not as workers. Therefore, the UK has a third category of employment which has been widely discussed as a possible solution to the issues arising from platform work. Yet,

platform companies have not utilised the worker category, arguing that platform workers are self-employed.

Another key element of the UK economy is the gig economy which encompasses a variety of different forms of low pay and low protection workers. The gig economy was well established before the arrival of platform companies. The gig economy refers to a large insecure workforce without stable employment contracts in the UK. Young people below the age of 34 make up over half of those working in the gig economy (Lepanjuuri, Wishart and Cornick 2018, pp.14). Platform workers fell cleanly into this category along with those on zero-hour contracts and agency workers (Trade Union Congress 2017a, pp.3-4). The types of gig work include private postal delivery drivers, retail workers together with platform workers. Therefore, the gig economy is different from the platform economy as it includes businesses which are not digital platforms. The already established gig economy meant that the arrival of the platform economy fitted into this category and, unlike Denmark, was not disruptive for social policy.

Unemployment insurance

Platform workers along with other gig workers have established unions that collaborate with the larger traditional unions in an attempt to improve their social rights. The Independent Workers Union of Great Britain (IWGB) has been the main union for platform workers and gig workers. The larger British unions, such as the Trade Union Congress (TUC) and Unite have been active in supporting platform workers but only as part of a wider campaign for increased social protection for gig workers. The TUC has been campaigning for better protection for gig workers continuously over the last fifteen years. However, unions lack influence in the UK as collective agreements are not relied on as much as in France and Denmark nor are unions involved in policy making. Protests and strikes have been utilised by platform workers, but the focus has been on pay and not on other social protection such as unemployment insurance. In 2016, Deliveroo tried to force riders to sign a new contract that the IWGB argued ‘could have seen [riders] earn less than half their current salaries’ but abandoned the plans after protests. The Department for Business has stated that the Deliveroo workers "have a right" to the national living wage’ although it is unclear where this ‘right’ came from (Shead 2016; Staufenberg 2016). Moreover, Uber drivers went on strike at the end of 2018, demanding an increase in pay of £2 (BBC 2018c). The strike was organised by The United Private Hire Drivers (UPHD) branch of the IWGB (ibid). Finally, there have been multiple protests by Deliveroo riders in Manchester (2019) and Bristol (2018) over the past

few years focused on obtaining decent pay (Wilkinson 2019; Cork 2018). Therefore, unions hold a weak position in UK policy making but have been active in challenging the practises of platform companies, but have been mainly focused on pay and not unemployment insurance.

The government has commissioned a major report on the gig economy called the Taylor Review. The review was commissioned in October 2016 by Prime Minister Theresa May and was lauded as the centrepiece of May's effort to make the Conservative Party the party of 'ordinary working-class people" (Stewart and Walker 2017). The year-long review was wide-spread focusing on 'everything from zero-hour contracts to the definitions of different employment statuses' (IPSE 2019). One of the key recommendations was that self-employed workers should be automatically enrolled in a pension plan (Taylor et al. 2017, pp.78). Other recommendations were made in relation to the gig economy including workers being provided with a statement of rights on the first day of work. However, none of the other proposals would resolve the issues faced by platform workers in accessing the three key social policies (ibid, pp.38). The review made vague statements about 'improving the rights and entitlements of self-employed people', and the need for 'more flexible entitlements and new ways for people to organise' (ibid, pp.9). It was not clear what policies were being recommended, in contrast to the working group established in Denmark, a clear policy package was not put forward. The ineffectiveness of the Taylor Review was demonstrated by union responses. Frances O'Grady, General Secretary of the TUC, said 'the right to request guaranteed working hours is no right all' when commenting on the review (BBC 2018b). A number of Unions expressed their concern that the report failed to address the most serious and pressing issues in the gig economy (TUC 2017). Moreover, the Government is not obliged to implement any of the recommendations. In spite of pledging to implement 51 of the 53 recommendations, a year and a half after the review was published the government has failed to pass any meaningful policy (Espadhina 2018b; Evans 2017). Therefore, the main review which covered work in the platform economy was crowded out by a focus on the gig economy as a whole. Modest recommendations were made, but none have been implemented.

There has been a lack of meaningful social policy development in the United Kingdom and so the status quo has applied to platform workers. The UK has a means-tested unemployment benefits system that is not accrued through work but rather is based on a lack of employment and resources (means). A new system was recently introduced called universal credit which has amalgamated six different types of benefit into one single payment a month (British

Government 2019c). In order for platform workers, categorised as self-employed, to access unemployment benefits they first must be recognised as 'gainfully self-employed' in an interview at a JobCentrePlus (Balaram 2017, pp.43). The definition of gainfully employed is 'based on the idea that a person is in business for themselves and so, for example, should be able to produce a business plan' (ibid). Proving to be gainfully employed may be a challenge for platform workers who have no need to carry out tasks related to the running of a business. Once unemployment payments begin, platform workers must report any earnings on a monthly basis (ibid). The minimum income floor (MIF) applies after 12 months of unemployment, meaning 'that payments will be made on an assumption that the claimant is earning a certain amount from self-employment' (ibid). The MIF does not take into account the income fluctuations that are common among platform workers which may lead to insufficient income. In the UK there is no universal workplace social insurance system, as in Denmark and France, platform work was placed into the gig economy and did not undermine the current unemployment benefit system. The unemployment benefit level is low and is a bare subsistence level, especially in comparison to other European states (Gaffney 2015, pp.34). Gaffney's research shows that the UK unemployment benefits spending per capita is one of the lowest in Europe (ibid, pp.10). Therefore, platform workers can access unemployment benefit for one year if they can prove they are gainfully employed which may be challenging. Unemployment benefit payments are very low to start and are not flexible enough for platform work.

Pension

The government has made no effort to develop pension plans tailored to platform work. A state pension can be claimed by any UK citizen when they reach the pension eligibility age (Department for Work and Pensions 2019). However, the pay-out level fluctuates depending on the individual's national insurance contribution record (ibid). The pension size is based on national insurance, which is a fee paid monthly to the government, and the amount is based on your earnings (ibid). For self-employed individuals they must submit their own self-assessment forms and calculate their own national insurance to contribute to a state pension (British Government 2019a). As in France, the burden is placed on platform workers to understand the welfare system and be proactive in obtaining a pension, differing from the automatic system of Denmark once the individual joins a union. Moreover, the UK has the lowest state pension income of any advanced country which is unlikely to be sufficient (Glennerster 2009, pp.687). Hence, the majority of the British labour force rely on occupational and private pension schemes which they are automatically enrolled in as employees (ibid). As platform workers are

self-employed they must find and enrol in a private pension scheme which is a complicated process. Uber drivers differ because the company has just changed policy and will automatically enrol its drivers into a pension scheme (Espadinha 2018a). Thus, there is a state pension system available to platform workers which requires them to sign up. The state pension pay-out level is insufficient especially with the low contributions of platform workers due to pay fluctuations. Consequently, the only way platform workers can obtain a sufficient pension is from the private market and the onus is on them to do so.

Sick leave

The courts have been most active in defining the social rights of platform workers in the UK. Two landmark court cases have occurred which demonstrate the unsuitability of current legislation for the platform economy. The most prominent court case involved Uber and is ongoing. James Farrar and Yaseen Aslam were supported by the GMB union to take Uber to court (BBC 2018a). In October 2016, an employment tribunal ruled Uber drivers were not self-employed, but workers entitled to the national minimum wage and holiday pay (Coulter 2018). The court's statement said that "for [Uber] to be stating to its statutory regulator that it is operating a private hire vehicle service in London and is a fit and proper person to do so, while at the same time arguing in this litigation that it is merely an affiliate of a Dutch-registered company which licenses tens of thousands of proprietors of small businesses to use its software, contributes to the air of contrivance and artificiality which pervade Uber's case' (Butler 2018). Uber is challenging the judgement and at the end of 2018 lost an appeal and so is taking the case to the UK Supreme Court, postponing the provision of minimum wage and holiday pay to its drivers (Gore-Coty 2018; BBC 2018a). However, Uber recently revealed that it would provide sick leave for all its drivers in Europe (Espadinha 2018a). In the second case Deliveroo riders took the company to court in order to gain recognition of the IWGB representing the riders and consequently meaning they are workers (Butler 2017). In contrast to the Uber judgement, The Central Arbitration Committee, a body that resolves worker disputes, ruled that 'the food delivery firm's riders were self-employed contractors as they had the right to allocate a substitute to do the work for them' (ibid). This ruling has made it very difficult for Deliveroo drivers to claim any social protection from Deliveroo as they are deemed self-employed. Therefore, the two main rulings on platform workers' rights have gone in different ways providing no further coherence in the form of social protection. After a change in company policy Uber drivers are now covered with sick leave.

The majority of platform workers remain defined as self-employed and so do not have a right to sick leave. The British government states that the majority of 'employment law doesn't cover self-employed people…because they are their own boss' (British Government 2019b). This statement demonstrates the farcical nature of defining platform workers as self-employed. If platform workers are unable to work due to illness they must attempt to claim unemployment benefit or disability benefit. Platform workers will not receive any support from platform companies even if the illness is work-related. Therefore, no policy developments have been made for sick leave for British platform workers apart from Uber drivers.

Overview

The UK has made little progress in developing the three key social policies for platform workers. Platform workers can access the unemployment insurance system as self-employed as long as they can prove they are gainfully employed. Even so the benefit payments are very low and are not flexible enough for platform work. Platform workers can access the state pension as long as they are proactive and pay their national insurance. However, the British state pension is regarded as insufficient even when high national insurance contributions have been made, which platform workers are unlikely to do. Hence, the onus is on platform workers to actively search and find a private pension plan for themselves. Finally, no platform workers are covered by sick leave. The exception is Uber drivers, now legally defined as workers, who have a right to holiday pay and, with a change in company policy, have pension access and sick leave. Thus, the UK has made little social policy development progress and platform workers are very insecure in terms of the three key social policies.

Country	Unemployment Insurance	Pension	Sick Pay
Denmark	Platform workers are able to make unemployment contributions when multijobbing. Contributions based on pay and not hours worked or work type. Digitalisation of the unemployment contribution scheme.	Tailored pension schemes for platform workers provided by union collaborations with private insurance companies. The pensions facilitate multijobbing.	Currently, the majority of platform workers do not have sick pay. The Hilfr/3F collective agreement provided sick pay to Hilfr's platform workers.
France	No government social policy development. Platform workers cannot access unemployment insurance as they are categorised as self-employed. Platform couriers, as employees, have access to unemployment insurance.	No government social policy development. A state pension scheme is available for platform workers which is complicated to access. The return on investment into the pension scheme is likely to be low due to low contributions. Platform workers are able to opt out. Income from multijobbing cannot be combined in contributions. Low means-tested benefit for over 65s. Uber drivers have automatic pension access. Platform couriers, as employees, have access to a higher level of pension coverage.	No government social policy development. There is a sickness scheme available, but the pay-out will likely be low due to the low contributions of platform workers. There is an opt out options. Uber drivers have sick leave coverage. Platform couriers, as employees, have access to sick pay.
United Kingdom	No government social policy development. Means-tested unemployment benefit available. Platform workers must prove they are 'gainfully employed' to receive benefit. The pay-out level is low and recipients are expected to be back in work after 12 months.	No government social policy development. State pension available to platform workers which requires them to be proactive in paying national insurance which determine the pay-out level. The state pension is insufficient. The burden is placed on platform workers to obtain a private pension plan. Uber drivers have automatic pension access.	No government social policy development. The majority of platform workers do not have access as they are self-employed. Only Uber drivers have sick leave coverage.

Table eight: Social policies for platform workers in the three case studies.

4.4. Conclusion

Overall, the findings of the research suggest that two differing trajectories have been taken in relation to social policy development for the platform economy. The first trajectory is in Denmark which acted to expand social policy protection for platform workers and prevent this new form of work undermining the welfare system. Denmark acted in order to shore up the welfare state so that platform workers are protected. Unions utilised their central position in provision to establish pension plans for platform workers. Whilst tripartite collaboration developed policy changes to make unemployment insurance more accessible and more automatic reporting of earnings in order to contribute. The Hilfr/3F agreement has provided sick leave to a small group of platform workers and laid a foundation to expand the voluntarist model to cover all of the platform economy. The second trajectory is one of inaction in France and the UK where platform work has been embedded in pre-existing structures. In France, traditional unions have been unwilling to help platform workers. Platform workers cannot access unemployment insurance. The state pension and sick leave schemes suffer from the same failings. They require platform workers to be proactive and allow for opting-out. Even if they do register their low contributions leave both forms of insurance as inadequate. Only platform couriers are fully protected as the Supreme Court ruled they are employees and not self-employed. In the UK, platform workers can access means-tested unemployment benefits that last twelve months and requires proof that they are gainfully employed. After the initial period the government assumes they are employed and lower the benefit. Platform workers can access a state pension but it is insufficient and in reality they have to actively register for a private pension but they get no help with the application. Platform workers have no right to sick leave apart from Uber drivers. Chapter five will look to explain the two different trajectories taken by the cases and in doing so will be able to answer the three research questions laid out in chapter three.

Chapter Five: Discussion

The discussion section of this thesis aims to answer the three research questions set out in the methods section (chapter three). In this thematic approach, the first section of this chapter will answer the question concerning social policy development, the second section will address whether the cases followed their welfare trajectories and the final section will determine whether policy change has occurred. This order has been chosen because it logical, first establishing an understanding of the processes by which policy did or did not come about, then looking at whether said policy was in line with the welfare regime and concluding with whether there has been policy change. The majority of this section focuses on social policy development in the three cases because the data collection mainly focused on this area. Undoubtedly, the lack of policy development from France and the UK contributed to the focus on social policy development. Each section will follow the same pattern of first considering Denmark, then France and finally the UK with France and the UK being combined when a similar point is being made. Only in section one will this pattern differ, as the utilisation of the historical institutionalist structure means the pattern will occur multiply times within the differing elements of the theory.

5.1. Social policy development for the platform economy

This section answers the question: how can the governments' social policy response to the challenges of the platforms be explained? In chapter four it was established that two trajectories have occurred, with Denmark taking action and developing considerable social policies for platform work whilst France and the UK followed the trajectory of inaction and integrated platform workers into the status quo. In chapter two's literature review, historical institutionalism was established as best able to explain social policy development for the platform economy. By utilising historical institutionalism both trajectories are able to be explored. This section is divided into the sub parts of the historical institutionalist theory in order for the effects to be clear. There are two main pillars of historical institutionalism: policy feedback effects and formal institutions, and each will be analysed beginning with the former. Policy feedback effects refer to the impact that past policies have on the policy process. There are three core policy feedback effects which will be scrutinised in the following order: interests and resources of interest groups, preferences and experiences of policy makers and lock in

effects. The three cases will be analysed in order for each respective effect. For formal institutions there are two types of political systems: consensus and majoritarian. Denmark falls into the former and France and the UK into the latter and they will be considered in that order adhering to the aforementioned order of cases. Finally, two contributing factors will be analysed, post-industrialisation and political context, whereby all three cases will be amalgamated into the two sections due to the lesser importance of such factors.

5.1.1 Policy feedback

Policy feedback effects have been key in determining why Denmark has acted and developed in all three social policy areas, whilst France and the UK have not. The interests of British and Danish unions were shared in expanding social protection to platform workers but only the latter group had the resources from policy feedback effects. British unions also faced business groups opposed to social policy expansion. French unions had greater resources to push for social policy change but did not because of the dualised labour market. Danish policy makers had experience in expanding and reforming social policy in the face of labour market challenges, whilst maintaining universality but French and British policy makers did not. This experience had feedback effects which made it more probable that Danish policy makers acted. The lock in effects of policies has narrowed the options available to policy makers. This drove Danish politicians to maintain the universalistic welfare state and unions to act and the French and British to not act due to the paths of dualisation and retrenchment respectively.

Interests and resources of interest groups

In Denmark, unions had a strong interest in expanding social protection to platform workers, whilst traditional business interests did not naturally align with platform companies' model of lower labour regulation. Unions have a strong interest in maintaining the universal social democratic model. As organisations that protect workers and whose legitimacy relies on its membership, unions have an interest in maintaining the status quo. The platform economy threatened the universal model by allowing cheaper labour into the labour market, undercutting unionised workers with social protections. Unions were vocal in highlighting the insufficiency of social protection for platform workers (Hesseldahl 2015). As has been well documented, unions have been central in developing the social democratic welfare state (Esping-Andersen 1985). Unions in Scandinavia are institutionalised into social protection provision of the welfare state which means they are invested in the maintenance of the comprehensive social

democratic model. Unions saw the erosion of universalist rights as a stepping stone to further reduction of social protection across the labour force. Also, to allow platform workers to go unprotected, would be to allow workers to step outside of the union's sphere of influence. If platform workers were allowed to continue being unprotected they would also not be unionised, leading to a weakening of unions. The universalist nature of social protection is central to Denmark as a social democratic welfare state (Esping-Andersen 1990). Given the centrality of the concept of universality and social rights not being linked to employment in the labour market. This is a core foundation of the welfare state and one that Danish unions are keen to keep as the protectors of workers in Denmark. Therefore, platform workers threatened the universal social protection system of Denmark which affords unions considerable power and, as an organisation whose job it is to protect its members, poses a threat to its legitimacy.

The desire to maintain universalism and expand their influence increased the interests of unions to drive social policy development. Unions engaged in reforming the welfare state in the early 2000s leading to the flexicurity system whereby job security was scarified in order to preserve comprehensive social protection security for Danes. The reforms meant that Danish unions were even more focused on maintaining the universalism of the welfare state because of the lack employment security. Moreover, there has been an incentive for unions to expand their influence. They have recognised that there is an opportunity to expand their influence by incorporating platform workers into the Danish model. Unions have been entrepreneurs by expanding insurance to platform workers. Multiple unions have created pension plans specifically focused on platform workers which require these workers to become members. The pension programmes allowed unions to expand influence and to gain members from a new employment group. Therefore, it was in unions' interest to defend the comprehensive and universal nature of the Danish welfare state by pushing for social rights to be expanded to platform workers, and by acting entrepreneurially to offer social rights access to this group of workers.

The interest of traditional businesses in Denmark did not automatically align with those of platform companies. Danish businesses have integrated the social democratic model and are committed to this model of social protection demonstrated by Hilfr's desire to set up a collective agreement. The biggest concern for traditional companies was platform companies low tax payments (Ilsøe and Weber 2018, pp.18). Moreover, there is a history of businesses and unions working together to find mutually beneficial agreements which contrasted platform

companies abrasive approach such as Uber's unwillingness to engage in social dialogue. Traditional businesses had no interest in pushing back against the comprehensive social protection in Denmark. Thus, traditional companies had no interest in supporting platform companies in trying to block social policy development.

Danish unions hold considerable resources stemming from policy feedback effects. Unions' influence stems from their central role within social protection provision and the social policy development process. In Denmark the 'principle of self-regulation is a key feature, and it is therefore only underpinned by supplementary legislation to a limited extent' (Due and Madsen 2008, pp.516). Hence, social dialogue is central to the policy development of social protection. The three sources of power for unions are: the Ghent system, collective bargaining and the institutionalised role in policy making. The Ghent system, where social protection is administered by unions, meant that unions had to be included in policy discussions regarding reforms to unemployment insurance. Unions were on the working group on self-employed in the unemployment benefit system which produced the policy recommendations for how the system should be modified for platform workers. The historical role of unions on committees contributed to unions' involvement in the disruption council and the working group. In addition, unions utilised collective bargaining, which has established the majority of social rights in Denmark, to develop a framework for how this system could be applied to the platform economy. 3F engaged and developed a comprehensive collective agreement with Hilfr which has provided cleaning platform workers with the most comprehensive coverage of any platform worker in Europe. Unions are likely to look to replicate this agreement with other platform companies. Also, unions, as social protection providers, collaborated with insurance companies to develop plans that suited the needs of platform workers. Therefore, unions were able to both push for social policy development for platform workers, and develop policy themselves, because of their institutional role in policy development processes and as providers. This lead to gains in all three key social policy areas.

Certain scholars argue that Danish unions have lost power due to reforms since the 1990s, such as centralised decentralisation (Wilthagen 2014). This may be true but the reduction in influence has been minimal and they are still very influential particularly when cross-comparing with France and the UK. Denmark has a very high union density (number of workers in a union) of 80% and as has been demonstrated, the policy feedback effects have provided unions with considerable resources to influence the policy making process (Fulton

2015). Unions have merged together over the past decade which has centralised their influence (Kjellberg and Ibsen 2016, pp.283). Thus, claims of union influence decreasing may have validity but they remain highly influential in the Danish policy making process. There remains a large gulf in power resources between unions and platform companies who are new organisations not afforded positive policy feedback effects. Platform companies have been unwilling to join employer organisations, as they consider themselves not to be employers, and platform companies are yet to effectively organise.

In contrast, the interests of established unions in France did not align with platform workers due to the dualised nature of social protection in France. Unions are focused on protecting the benefits of insiders, their union members, and so fighting to expand insurance to platform workers was not in their interests. Consequently, platform workers did not receive any meaningful support from unions. Traditional unions did little to support platform workers which was a key driver for them to establish their own unions, such as CLAP. The approach of established unions was summarised by an individual from the union SCP VTC when he said that they received little support from the established unions in their efforts to obtain social protection, and the larger unions only come and support when a success is close (Akgüç 2018, pp.20). The lack of interest from established unions in supporting platform workers was compounded by their own social rights being challenged by reforms to the code du travail. They have been focused on trying to block Hollande and Macron in their reform efforts and not on supporting platform workers (Bock 2017). Finally, French social policy over the past twenty years has demonstrated to unions that they can maintain benefits as long as they sacrifice the social protection of outsiders. Therefore, dualisation has made it not in the interest of French unions to utilise their resources to fight for the social protection of platform workers.

In contrast to Denmark, platform companies have greater resources in France as the country is focused on developing the digital economy. France has looked to be a digital frontrunner since the outset of the fourth industrial revolution (Akgüç 2018, pp.1). As early as 2013 the La French Tech programme was established aiming to ‘bolster the growth and standing of French digital start-ups’ (French Government 2015). The pro-tech environment provides platform companies with greater resources to negotiate as France desires to present itself as welcoming to tech companies. When a central foundation of the platform economy is the cheap labour costs associated with defining platform workers as self-employed, the French government was unwilling to challenge platform companies and risk obtaining a negative reputation. Hence, the

policy feedback effects of France aiming to provide a fertile ground for tech company growth afforded platform companies resources to influence the policy making process as they argued that decisions against them are signs of the government not being supportive to this new sector.

Unions in Britain are the weakest of the three cases, having had their power eroded over the past twenty-five years and not occupying an institutionalised role in policy making or social protection provision. Previous policies weakening social protection has meant the establishment of the gig economy. Hence, the focus of unions has not been solely on platform workers but also on this whole group that has low social protection. Subsequently, the interests of unions are not as focused as in Denmark. A recent Trade Union Congress report called for gig workers 'to be given greater protection and benefits', but at no point did it specifically mention platform workers (Elliot 2018). What is more the level of social rights is considerably lower in the UK, leading unions to be mainly interested in securing a liveable wage for gig workers and not comprehensive social protection. Austerity under the Conservative government has led to a battle to maintain social provisions. The reforming of the unemployment scheme has made it harder to claim social protection, especially unemployment benefit and longer waits for payments (Unite 2019). Unions have been focused on fighting these reforms since 2010 and not on the platform economy (ibid). Therefore, UK unions are weak and their interests are spread between opposing welfare state retrenchment reforms and the gig economy. The platform economy is just one element of the gig economy.

There are entrenched business interests in maintaining the gig economy. Since the millennia there has been a normalisation of non-standard work in the UK in the form of the gig economy. The gig economy benefits more than just platform companies as it provides low cost flexible labour to a range of businesses. Most notorious is the sports goods store Sports Direct, who utilise flexible workers in order to pay the lowest possible for the labour it requires (Wright 2016). There is a shared interest by businesses to maintain low social protection, demonstrated by the support of businesses for austerity, in order to maximise profits. Tax may be an issue for UK businesses, but research suggests that this has not been high on the business agenda. Moreover, the pro-business Conservative party has been in government since the platform economy arrived and this provides greater resources for businesses to influence the policy process. An example is former Prime Minister David Cameron personally intervening to stop increased regulation of Uber in London (Pickard 2017). Therefore, traditional businesses and

platforms have aligned interests in the UK due to the gig economy, and the Conservative government provided them with greater resources to influence the policy process.

Preferences and experiences of policy makers

Denmark has had experience in reforming and adapting the welfare state rather than retrenchment. Denmark effectively responded to the new social risks regarding women entering the labour market. The Nordic countries were the first to shift towards female-friendly employment policies in Europe in the 1970s providing women with support to both work and have children (Bonoli 2007, pp.505). An example is the establishment of comprehensive and accessible child care services which 'provided a double bonus: enabling women to have children and careers while also maximising employment levels' (Esping-Andersen 2002, pp.14). These policies came about as a result of labour shortages and demonstrates that Denmark has a history of overcoming labour market challenges through reforms which expand the welfare state (Bonoli 2007, pp.505). In addition, in response to the sluggish economy supply-side policies were developed. Social-Democrats in 1993 were focused on easing the 'almost chronic problems of high unemployment by way of an active labour market policy' (Benner and Vad 2000, pp.446). Active labour market policies aim 'to make sure that unemployment spells are as short as possible, by proactively helping jobless people re-enter the labour market' (Bonoli 2012, pp.181). An example is retraining programmes that enable unemployed individuals to develop new skills in order to find a new job. There was an expansion in social security contributions which paid for these programmes. In 1994 a 'three-year period of 'activation' in the form of training, re-education, or on-the-job experience' was established (ibid, pp.451). A 1997 law obligated municipalities 'to activate any person with a problem other than unemployment' such as by offering a 50 percent state financed wage subsidy (ibid, pp.452). The activation strategy 'depended on the active support of trade unions and employers' (ibid, pp.453). Hence, there was clear template of how to adjust social policy to new challenges that rejected retrenchment. Most recently, after the 2008 financial crisis the flexicurity system was adapted but not removed. The 2008 recession placed a lot of pressure on the flexicurity system of Denmark leading to the OECD to state that it had 'struggled recently' (OECD, 2016, pp.11). Reforms were carried out that aimed to increase the labour supply by making employment services more effective (Bredgaard and Madsen 2018, pp.383). However, flexicurity was not disbanded but rather maintained and provides 'employment security compensating for the lack of formal job protection as well as the disincentive effect of a relatively generous unemployment benefit system' (ibid). Bjørn and Høj compare its

generosity with six other northern European countries, finding that the Danish system, even after the 2010 reform, remains relatively generous (2014). Thus, all three cases show Danish policy makers have a history of developing policies which adapt to labour market challenges whilst maintain the universalist welfare state. The path of previous reforms to maintaining comprehensive and universal social protection will have influenced policy makers in their policy response to the platform economy.

The policy feedback effects on French and British policy makers differ from Denmark as the focus has been on retrenchment rather than adaptation and maintenance. In France, the economic pressures placed on the welfare state led to the government choosing to dualise the labour market. The segmentation of the labour market is between those with high coverage and security and those with lower coverage (Häusermann and Schwander 2012, pp.29). An example of dualisation is the legislation passed in the 1990s on working-time reduction which widened 'the gap between firms with different organisation levels and union bargaining capacities' (Palier and Thelen 2010, pp.126). In large industrial firms and the public sector where unions maintain influence a trade-off was made whereby 'working-time flexibility and increased productivity' was given for job security (ibid). Whereas, in smaller firms and low-skill sectors 'working arrangements and conditions have deteriorated and external flexibility has increased' (ibid). Another element that has allowed for the erosion of job protection has been the use of 'atypical' working contracts which policy makers have allowed to expand 'massively since the 1970s' (ibid, pp.130). In the 1970s 3% of all employment was atypical jobs (including fixed-term, part-time, and agency jobs), by 2007 that number had risen to 25% (ibid). The trend of social policy development has been retrenchment and reduction. Thus, when social policy expansion is required, as in the case of the platform economy, there are less policy feedback mechanisms to provide a guide on how policy makers should act, reducing the probability of policy makers acting.

Similarly, the social policy development focus in the U.K. has not been to expand traditional social protection areas such an unemployment benefits or pensions. As a liberal welfare state there has been a long tradition of British policy makers focusing on the market as the main arena for supporting citizens. Here 'entitlement rules…are strict and often associated with stigma' (Esping-Andersen 1990, pp.26). The state focuses on 'encouraging the market' as the main means of supporting citizens (ibid, pp.27). As a result, social policies are contained and there is an aversion to expansion (ibid). Social policy in the UK since the 1990s has been one

of increasing conditionality in order to access social benefits (Edmiston 2018, pp.262). The introduction of benefit sanctions and financial penalties now have ‘an increasingly prevalent role with these being used much more widely and frequently than ever before in social security, but also other welfare domains' (ibid, pp.263). The universal credit welfare reform is the most recent example of British policy makers narrowing and decreasing social policy provision. Also, gig work with low protection was allowed to expand. Thus, British policy making has not been focused on expanding social protection but rather sees the market as the key arena for supporting citizens. This makes policy makers predisposed to support the platform economy and not motivated to expand social policy to protect new types of work.

Lock in effects

The institutions which make up the Danish welfare state have committed to a certain path of universalism and comprehensive social protection which is difficult to change. Two elements previously mentioned of Danish social protection, collective bargaining and flexicurity, demonstrate the lock in effects. Dismantling the collective bargaining system would entail significant obstacles. A large amount of social protection is determined by collective bargaining and the agreements are sector specific. To replace collective bargaining would require a significant overhaul of the system and the passing of a number of new legislation packages to replace it. The Ghent system has laid out a way of providing social protection which has made Demark committed into the future. Unions have agreements on pensions and sick leave which are based on contribution and union membership. To reform these programmes would create upheaval. A better method to overhaul the system would be to chip away at it but considering the significant resources and incentives that unions have in the policy making process, this too would be challenging. Additionally, the flexicurity reforms have amplified the commitment workers have to the universal system. Having given up job security in exchange for the maintenance of the universal social democratic model workers are unwilling to accept the erosion of social protection. This is a difficult model to move away from due to the drastic implication of reducing government supported universalism. Furthermore, Danish employers support the flexicurity system as it has been effective with developing and training a workforce suited to the modern economy (Bredgaard and Daemmrich 2012, pp.15). Hence, there is continued support by both the Danish employers’ associations and trade unions for the system of flexicurity (Andersen, Kaine and Lansbury 2017, pp.56; Madsen and Bjørsted, 2016). Therefore, the Ghent system and collective agreements have meant that Denmark has long term commitments and to change the direction of social policy

would be very challenging considering the support for the status quo from business and trade unions. Lock in effects meant that Danish policy makers had a narrow set of policy options when considering the platform economy and were driven to expand social protection.

Danish citizens are invested in the universalist model creating lock in effects. The current system of social protection provision in Denmark has led to Danes making commitments into the future and building their lives based on flexicurity. As Trentz and Grasso's research suggests 'Danes…remain strongly supportive of the high-tax and welfare regime, express high trust in the state, political parties and parliamentary representation' (2017, pp.24). Numerous studies have confirmed these findings with Danes being proud and invested in their welfare state (Christoffersen et al. 2013; Jöhncke 2011). It is reasonable to assume that Danes are invested in their welfare state. This is evidenced by the support they have for a system that requires them to accept government policies that aid the jobless and activate them back into the labour market. The current system sees all Danes reliant on the welfare state and benefiting from it. Based on this observation, Danes clearly plan their future relying on the stability of flexicurity. Given the attention that the platform economy received since it entered Denmark, citizens were aware of how it was undercutting the welfare state. Therefore, the Danish government was aware of the lock in effects of the universalist model of flexicurity for citizens and thus expanding policy to a small group of platform workers rectified the model.

In France there are lock-in effects which reinforce the segregated labour market preventing the development of social policies to protect platform workers. Comprehensive social protection is for insiders, which platform workers are not, and thus they easily fit into the outsider category. In order for high protection for insider workers the social protection of outsiders has been lowered. The reforms which brought about the dualised labour market began in the 1980s and continued to the present day and have significant lock in effects, to the detriment of outsiders. Under the Chirac government of 1986–88 removal of 'mandatory prior authorisation for collective dismissals on economic grounds', made it easier to fire workers thus making the labour force more flexible (Palier and Thelen 2010, pp.127). Trade unions have 'successfully resisted major changes in employment protection for core workers' by allowing for 'increased flexibility for other types of job[s]' (ibid). The reforms were carried out through outsourcing of jobs to lower cost workers. Trade unions and past policy makers have committed France to a dualised labour market because an increase in social protection for outsiders under the current system would be too costly. In order to achieve more comprehensive social protection there

would need to be reforms of the social rights that insiders have which trade unions, influential in the policy process, would block vehemently. Thus, the lock-in effects of dualisation contributed towards the inaction of both unions and policy makers in taking meaningful action to provide social protection to platform workers.

In the UK lock in effects are apparent in that they have created powerful constituencies who do not want social protection developed for gig workers (which include platform workers). Pierson argues that right-wing retrenchment has been prevented by lock in effects. However, there has clearly been significant retrenchment in social policy in the UK since Pierson wrote his path dependency theory in the 1990s. Most notably in the implementation of austerity since 2010 and the establishment of the universal credit system. The British labour market structure has made developing comprehensive social protection for platform workers difficult due to the gig economy. The gig economy, made up of flexible workers with low protection, represents a significant minority of the labour market and meant that the introduction of platform work was uncontroversial in the UK. If meaningful policy was to be passed to provide comprehensive protection to platform workers, then a set of reforms would be required to also extend coverage to the three million workers within the gig economy (TUC 2016). Such reforms would carry a large economic cost. Moreover, British companies rely on the gig economy, with some companies such as Hermes, Sports Direct and Next utilising this type of worker for the majority of their operations (Farrell 2016). To expand social protection for gig workers would place an economic cost on companies which they neither want, have planned for, or will tolerate. Business holds significant power in the UK and companies have made long term commitments based on the stability and continuation of the gig economy. Therefore, if the government were to provide platform workers with more comprehensive social protection it would have to also afford the same social rights to gig workers as a whole. Business groups are staunchly against the removal of the gig economy which they rely on due to its low costs and flexibility and have made commitments based on its continuation.

Overall, the policy feedback mechanisms drove Denmark to act and facilitated France and the UK's inaction. Past public policies have meant that Danish unions have both the interests and the resources to drive social policy development for platform workers. In the UK, unions had the interest but not the resources and in France unions had some resources but not the interests to act. Elites in Denmark had positive feedback from past efforts to adapt the social democratic model to new challenges whilst maintaining its core universality. In the UK and France, recent

history has been one of retrenchment and dualisation respectively and not social policy expansion. The lock in effects of flexicurity in Denmark also placed pressure on elites to act to maintain the system and not allow for it to be undermined by the platform economy. In contrast France is locked into a path of dualisation and the UK has committed to the large gig economy.

5.1.2 Formal political institutions

The second pillar of historical institutionalist analysis is formal institutions of each state that impacted the social policy development response to the platform economy. Denmark's consensus political system disperses power and encourages consensual and collaborative policy development following a stable trajectory. This effect was demonstrated in the committee system which provided unions with considerable influence over policy making. Whereas in the majoritarian system of France and the UK power is centralised, reducing the number of actors who can influence the policy process and reducing the risk of inaction as other political parties or interest groups cannot destabilise the government.

Consensus Denmark

The proportional representation electoral system of consensus democracies produces coalition governments which require compromise in policy making and the stability and continuity in policy making. This is a contributing factor to the continuance of the universalist model in Denmark. Committees enable a number of actors to influence the policy process. Their role is to review policy and members include politicians, unions, business groups and other types of interest groups. The committee system is in line with consensus style politics whereby all parties and groups are involved in the development of legislation. This system was a key driver of the establishment of the tripartite commission of government officials, unions and businesses to analyse the new challenges for unemployment insurance provision (Ilsøe 2018, pp.279). The working group on self-employed in the unemployment insurance benefit system followed the committee structure of tripartite policy development to make reforms to the unemployment insurance more accessible to platform workers. Moreover, unions used their influence to push for the expansion of social protection to platform workers, which politicians listened to and took seriously (ibid). Therefore, the formal institutional mechanism of committees associated with consensus democracies like Denmark provided unions with the opportunity to directly influence the social policy making process for the platform economy.

Majoritarian France and the UK

France is a majoritarian political system, but not as much as the UK, as its institutions are 'biased towards centralisation and uniformity' (Lane and Ersson 2003, pp.119). The French President holds a central position in the political and legislative process. The political system gives considerable influence to the President who is able to 'control closely the legislative bodies, having notably the possibility to dissolve the lower house of parliament' (Bevort 2012, pp.1). France remains a centralised country, which has a unitary structure (ibid). The presidency represents both 'the ultimate prize sought by France's major politicians' and an 'organising principle … not only of political life generally, but of the parties themselves' (Gaffney 1988, 3-7). The lower house does have legislative dominance but traditionally one party dominates the presidency and legislature (Samuels 2002, pp.470). The President has a lot of power to act, although not as much as the UK as the legislature and parliament are separate. Successive French Presidents have been unconcerned with expanding social protection, demonstrated by both Hollande's attempt and Macron success in trying to reform the code du travail (Bock 2017). Despite unions integrated position dualisation means they do not act and are not concerned with platform workers due to the dualised protection of insiders and outsiders. Hence, leaders are better able to drive their agenda. Therefore, the President holds considerable power in the French majoritarian political system which allows them to drive the political agenda. The two Presidents who have been in power since the arrival of the platform economy have been unconcerned with expanding social protection to platform workers, rather they have been focused on reducing employment security.

Whilst some have argued that majoritarianism is declining in the UK, the country continues to be a leading example of this type of political system producing strong parties to govern, even if they are in a coalition. The UK fits Lijphart's definition of majoritarianism as it has commonly produced single-party majority cabinets, the executive has dominance over the legislature, there is a two-party system supported by a majoritarian and disproportional electoral system and it has a flexible constitution that can be amended by a simple majority. (1999, pp.2-4). The dominance of the ruling party can be demonstrated. If Labour had been elected they would have been expected to act due to its association with unions but have not been in power since the arrival of the platform economy. Instead the Conservatives have held power and not passed legislation, demonstrating the influence of the ruling party. Further, the pluralism of the UK political system makes it harder for platform workers to gain protection. Platform workers are too small a group to influence the government. The Independent Workers

Union of Great Britain has been the central union for platform workers but has not been able to influence the government. Rather the main route has been through the courts (Forde et al. 2017, pp.80). In addition, there is less of an electoral risk for inaction in the UK. Conservatives are the dominant party and there are no minority parties who can walk away from government if they do not act. In the current political climate this is not completely true as the DUP (Democratic Unionist Party) could walk away. However, this is a unique situation and there has not been an example in recent years of a minority party quitting government. There have been successive elections for governments supportive of the gig economy and so to not act carries little risk. Finally, the Taylor Report is different to the tripartite discussions held in Denmark. Firstly, the Taylor Report was not tripartite because it was an independent commission made up of a number of individuals who carried out research and analysis. Secondly, no policy came of it. Thus, the majoritarian system in the UK meant that the government was under less pressure to act because it dominated the legislative agenda and there was little risk associated with inaction.

5.1.3. Contributing factors

The first contributing factor is the way in which post-industrialisation has impacted each country. Denmark is in less need of developing the platform economy whereas the UK, and especially France, are likely to take advantage of it in order to decrease unemployment in a post-industrialised economy. Major changes have occurred in the risk-structure of European countries due to 'technological transformation and the dominance of service employment' (Esping-Andersen 2002, pp.2). In the 20th Century low skill workers could count on a secure and well-paid manufacturing job. This has drastically decreased in today's economy (ibid). The pressures of post-industrialisation have been more felt in the UK and France with high unemployment rates especially after the 2008 recession. In France the high cost and inflexibility of labour has contributed towards an unemployment rate that was 8.8% in February 2019, the fourth highest in Europe (Eurostat 2019). In the U.K. the government is keen to access all forms of employment in order to get citizens into work. Both countries welcomed platform companies. President Macron has called for Uber to not be overregulated in Paris and he sees the platform economy as a source of jobs for the unemployed (Masson 2016; Durand 2016). In the UK former Prime Minister David Cameron personally intervened to stop increased regulation of Uber in London (Pickard 2017). Both governments have been focused on increasing employment and see the platform economy as an opportunity to do so. This has

made them less willing to increase the costs of these companies doing business in their countries by increasing costs related to social protection of platform workers. In Denmark the social investment strategy has been a central pillar of the flexicurity model and a market driver of low employment. The strategy focuses on supporting citizens to re-enter the labour market by providing retraining in order to fit the needs of the post industrialised economy. This strategy has also made Denmark an attractive place for companies due to the skilled workforce. The policies include general and vocational guidance, job search assistance, individual job-oriented action plans, private and public job training, education, leave schemes, job rotation, and pool jobs on a full-time basis (Hendeliowitz and Woollhead 2007, pp.123). Consequently, the Danish unemployment rate is the second lowest in Europe at 3.1% and the country is under less pressure to find job creation opportunities (Euorstat 2019). Therefore, the UK, and especially France, are more focused on the upside of the platform economy as a means of employment, which contributed to their lack of action. Whereas Denmark, with its strong activation system and low unemployment, was less in need of the platform economy and could set the parameters under which these companies had to operate in relation to social protection. Consequently, the fear of losing the platform economy due to implementing social protection requirements was less of a concern in Denmark.

The second contributing factor is the modern day political context which has influenced policy makers and what is deemed feasible. In both France and the U.K. major policy challenges have made it hard with Brexit dominating Britain. In France there has been a continual battle to reform the Code du Travail. Ex-President Hollande's attempts at reform were met with widespread protests (BBC 2016). President Macron has passed changes to the Code du Travail which focus on fixed-term employment contracts, collective bargaining and terminating employment, which have been met with large protests (Greenacre et al. 2017). Most notably the 'Gillet Jaune' protests that have lasted from December 2018 to the present day and have in part been about the reforms (Lichfield 2018). Thus, in this environment unions are focused on maintaining their insider benefits and Macron is evidently not focused on expanding social protection. In Britain, exiting the European Union has completely dominated the political agenda since mid-2016. The United Kingdom has struggled to find consensus and the Brexit issue has dominated Parliament's time. Although, obtaining data is challenging, it is intuitive that policy-makers have been focused on leaving the European Union and not on policy development. This hectic and unstructured process has pushed all other issues aside as the UK engages with this issue both internally and with the EU. Denmark's political environment was

more suited towards policy development of expanding social protection. Denmark has had less major political crises. The biggest issue in the past five years has surrounded immigration which has not been linked to the platform economy (Abend 2019). Inger Stojberg, the Immigration Minister since 2015, has been focused on stopping "illegal immigrants' entering Denmark and integrating immigrants into Danish life (ibid). Therefore, there were less contextual issues holding back Denmark from acting unlike in France and the UK.

5.1.4. Conclusion

Historical institutionalism has provided a framework to explain the dual trajectories of social policy development for the platform economy identified in the previous chapter. Policy feedback effects influenced the actions of policy makers. Unions in Denmark had strong interests and resources stemming from their position as a provider of social protection. French unions had the resources but not the interest to help outsider platform workers and British unions had the interest but not the resources to drive for social policy change. In France and the UK platform companies had significantly more influence to campaign against social policy development and the maintenance of the status quo than in Denmark. Danish policy makers had experience of expanding the universalistic welfare state to overcome labour market challenges, as was required with the platform economy. In France the trend of retrenchment and dualisation had dominated past social policy making and the UK had mainly engaged with retrenchment and not expansion. In France and the UK there was less experience of adapting the welfare state through social policy. The lock in effects of the Danish comprehensive and universal welfare state meant that policy makers were left with few choices but to act to maintain the system. Whereas in the UK and France lock in effects discouraged action. Additionally, formal institutions of each country either increased or decreased the chance of social policy development. The consensus system of Denmark encourages collaboration and finding compromise because of the dispersion of power, which also gave unions greater influence. Consequently, policy development is more stable and consistent in its trajectory. In contrast, the majoritarian systems of France and the UK mean that power is centralised in the hands of the government, and so less actors are able to influence the policy making process, and inaction is easier. A final point relates to the contributing factors of post-industrialisation and the political context which both facilitated policy action from Denmark and inaction from France and the UK. Therefore, historical institutionalism was able to best explain the government social policy response from each case to the challenges of the platform economy.

5.2. Welfare regime trajectory

This section addresses the question: has social policy development for the platform economy followed the welfare regime of each state? In chapter three it was established that there are three types of welfare states based on Esping-Andersen's regime categorisation: social-democratic, conservative and liberal. The cases analysed in this thesis were based on the categorisation with Denmark as a social-democratic regime, France as a conservative regime and the UK as a liberal regime. Consequently, an aim of this thesis was to establish whether the platform economy has shifted any of the countries away from their welfare regime typology. If this were to be the case, the platform economy would be considered as having a significant impact on welfare states in the West. However, the findings demonstrate that the platform economy has not affected the welfare regime trajectory as all three cases have adhered to their typology. Denmark's social policy development strengthened the social-democratic welfare state by erasing the issues caused by the platform economy that were undermining decommodification effects. Whereas France and the UK were following typologies by not acting and integrating platform workers into the current systems of dualisation and the gig economy respectively. The following analysis is presented case by case beginning with Denmark, then France and finishing with the UK.

The social policies developed by Denmark for platform workers has followed its social democratic welfare state regime. A core aspect of the social democratic regime is universalism whereby 'citizens are endowed with similar rights' (Esping-Andersen 1990, pp.25). The social policies that have been developed all increase access to social rights for platform workers, increasing universalism in Denmark. The Hilfr/3F agreement particularly paves a way to fully integrate platform workers into the Danish welfare state. The agreement also suggests that the process of Danish policy makers is looking to decommodify platform workers, that is where workers can 'maintain a livelihood without reliance on the market' (ibid, pp.22). By providing a path to becoming an employee, platform workers at Hilfr will have high levels of decommodification. Platform workers now have unemployment insurance which is easy to access and will support them if they are unable to work enough to support themselves. The pension plans developed by unions and the unemployment insurance reform demonstrate a central aspect of social democracy – to encourage employment whilst guaranteeing social protection. Whilst only two social policy areas are covered they are some of the most important

and show Denmark to be a leader in ensuring platform worker security. Therefore, the social policy development for platform workers in Denmark has followed the social democratic regime. Platform workers' decommodification levels in Denmark are higher than any other platform workers in the advanced world.

France, as a conservative welfare state, has followed this regime in its response to the platform economy. The social insurance model is still important in France and enables stratification, most notably between insiders and outsiders. As Esping-Andersen identifies, this model enables the consolidation of 'divisions among wage earners' (ibid, pp.24). Platform workers have been shut out of the comprehensive benefits afforded to insiders and placed into the outsider category in the dualised labour market. Established unions, aware of their benefits, were unwilling to help platform workers in their campaign for increased rights. Outsiders have unstable work hours, lower job protection and lower social protections and platform workers match this profile (Palier and Thelen 2010). Even when platform workers were able to access some form of social protection, such as pensions, their low contributions caused by the low pay they receive means that the social policy is redundant. The conservative welfare regime is noted for social protection being closely linked to the contributions workers make to the social insurance scheme (Häusermann and Schwander 2012, pp.31). There has been an 'emphasis on upholding status differences' long associated with the conservative welfare state. Therefore, the placing of platform workers in the outsider category demonstrates the tradition of stratification in conservative regimes and the dualisation of the labour market.

The UK's social policy response followed the tradition of liberal welfare states to focus on the private market as the provider of security and the provision of low benefits. The commitment to the market as the main source of security was a key driver of the inaction of the Conservative government. Unemployment benefits are not associated with work rather they are means-tested, and this is the same for platform workers. Platform workers have to prove they have worked, and that means the criteria for benefits if they are unemployed, and there is a set limit on the benefits. Even when social protection is provided the level is low and inadequate. Platform workers can access a pension plan but, as in France, their low contributions mean that the pension will likely be insufficient. This demonstrates the trend of liberal regimes for 'the better off turn to the private insurance' and the state to encourage workers to rely on the private market to obtain social protection (Esping-Andersen 1990, pp.25). Unlike Denmark, British platform workers are highly commodified with no sick leave and low pay making them wholly

reliant on their employment (ibid, pp.27). Therefore, the social policy response from Britain followed the liberal regime model of being ungenerous, and thus ineffective, and encouraging platform workers to rely on the market.

Conclusion

In conclusion, all three cases followed welfare regime typology in their social policy response to the platform economy. Denmark followed the tradition of decommodification in social-democratic regimes by providing easier access to unemployment benefits along with pension plans. The Hilfr/3F collective agreement has laid the path for further decommodification of platform workers in the future. France continued the tradition of stratification through differing levels of social policy provision. Platform workers were placed into the outsider category of the labour market affording them with lower social protection. Finally, the UK continued to use means-tested and ungenerous social policies and a commitment to encourage citizens to rely on the market for security.

5.3. Social policy change

This section answers the final research question: to what extent have the policy challenges presented by the platform economy triggered policy change? The literature review in chapter two not only set out theories of social policy development but also a number of theories on what constitutes social policy change, especially in the third period. Understanding social policy change allows for a greater understanding of how welfare states develop and whether social policy change impacts the trajectory of the welfare state. Historical institutionalist analysis is associated with explaining policy continuity. However, the utilisation of historical institutionalism in section 5.1 was to explain why there were two trajectories of social policy development for the platform economy. This section did not support Pierson's claim of path dependence in the welfare state. The analysis divides the cases based on the social policy development trajectory they took. In Denmark there has not been social policy change, rather social policies were developed to ensure continuity. In France and the UK there has been social policy continuity as well, however there is a chance that policy drift may occur in the future if neither country develops any social policies for platform workers.

Denmark's greater action regarding social policy may suggest that policy change has occurred in Denmark, but the policies which have been passed have been to maintain the status quo

rather than drive Danish social policy in a new direction. The expansion of pension access to platform workers was the enlargement of pension coverage through private-public partnerships and following a similar pattern to other pension plans offered through unions (Fagligt Fælles Forbund 2018). The reform to the unemployment insurance system was mainly focused on access for platform workers and did not affect the benefits of other types of workers. Regarding the Hilfr/3F agreement, it has followed the traditional structure of collective agreements in Denmark so is not a change to social policy. Although, there have been criticisms that the agreement has created confusion with the existing rules for temporary workers (Elkrog Friis 2018). However, the agreement is being monitored and will be evaluated after the first year, allowing for clarification. Hence, the criticisms are not serious and the agreement is currently only for a small part of the platform economy. Social policy development in Denmark could be seen as demonstrating incrementalism. However, historical institutionalist analysis has provided a more thorough explanation of the social policy development process. A collection of institutions impacted actors to produce policy continuity. Therefore, there has not been social policy change for the platform economy in Denmark, rather policy development occurred to ensure continuity.

In neither the UK nor France has policy change occurred mainly due to the inaction of both governments to develop any impactful policy. In both countries platform workers have been integrated into the status quo and had pre-existing policies applied to them. In France platform workers have become outsiders and are defined as self-employed and so no social policy change has occurred. Likewise in the UK platform workers are mostly defined as self-employed and in the gig economy. Combined with the historical institutionalist analysis, both countries demonstrate policy continuity. Although, there may be signs that policy drift is occurring through a combination of inaction by policy makers and action from the courts. The court rulings for food couriers drivers in France and Uber drivers in the UK suggest that a trend may be occurring whereby legal judgements slowly shift the social policies related to outsiders and gig workers. However, it is too early to tell and so only time will tell if policy drift is occurring. Additionally, the change agents which Thelen and Mahoney claim to drive this type of change are not present, so further analysis would need be to be carried out. Thus, at this current point the platform economy has not triggered policy change in France and the UK but policy drift may be occurring but requires more time to pass.

Conclusion

Therefore, in none of the case studies did the platform economy trigger policy change. The action of Denmark to develop social policies to expand social protection to platform workers was a continuation of the social-democratic welfare regime. In France, no social policy has been developed and platform workers have been placed within the existing welfare state structures as outsiders. In the UK platform workers were integrated easily into the gig economy requiring no social policy development and thus continuing the existing social policy. Although, in France and the UK there is a chance that policy drift will occur as both governments refuse to develop social policies for platform workers.

5.4. Conclusion

Overall, this chapter has answered the three research questions set out in chapter three. Firstly, historical institutionalism is best able to explain social policy development for the platform economy. Historical institutionalist analysis demonstrated that the two trajectories of social policy development identified in chapter four can be explained by policy feedback effects and formal institutions and to a lesser extent contributing factors. Secondly, each case study has followed its welfare regime typology. Denmark developed a social policy response which increased decommodification of platform workers. Whereas France and the UK integrated platform work into existing social policy frameworks of dualisation and the gig economy. Finally, platform work did not trigger social policy change in any of the cases as Denmark's social policy developments were continuations of the comprehensive and universalistic social-democratic welfare state. In France and the UK no social policies were developed and so little changed as platform workers were given the same social protection as the self-employed.

Chapter 6: Conclusions and Recommendations

This thesis aimed to establish an overview of social policy in the platform economy. Social policies for platform work is a complex research field due to the combination of the disruptive nature of the platform economy and the unwillingness of governments to act. The platform economy is ever evolving but scholars must attempt to track this phenomenon in order to understand the impact of the fourth industrial revolution and how governments react to disruptive labour market trends. The findings and analysis presented in this thesis are by no means conclusive but rather are an attempt to provide a foundation that other scholars can build from.

This thesis has provided a systematic analysis of the interaction of social policy with the platform economy. A dual trajectory of social policy development for the platform economy has been identified with Denmark taking action to expand social protection across all three of the key social policies to platform workers. Whilst France and the UK took the trajectory of inaction and integrating platform workers into pre-existing labour market structures causing platform workers to have low social protection. The dual trajectories of social policy development can be explained by historical institutionalism. Policy feedback effects and formal institutions drove the direction of social policy development for the platform economy. The policy feedback effects meant that the interest and resources held by unions facilitated them to both develop and drive for social policies to protect platform workers in Denmark. Whereas, unions lacked interests, as in France, or resources, as in the UK. Another policy feedback effect concerned the experience of policy makers which influenced the policy options they deemed available. In Denmark policy makers were experienced in adapting the Danish welfare state to new labour market challenges, whereas in France and the UK the experience of policy makers was either in dualising the labour market or welfare state retrenchment. The final influential factor of policy feedback effects was lock in effects. Past social policy commitments by Denmark narrowed the policy choices available and drove policy makers to act to maintain the comprehensive and universalist welfare state. In France and the UK, the lock in effects of dualisation and the gig economy made it difficult for policy makers to expand social protection to platform workers. Moreover, the formal institutions influenced social policy development. In Denmark, a consensus democracy, more actors had power to influence the policy process and collaboration was required which encouraged action. In the majoritarian system of France

and the UK, power is centralised in the government which was unwilling to act in both countries and was less able to be influenced. Thus, historical institutionalism provided a convincing explanation of social policy development for the platform economy.

The findings also provided insight into the impact of the platform economy on welfare regime trajectory and social policy change. All three cases followed the welfare regime in their response to the platform economy. Denmark developed social policy in order to integrate platform workers into the comprehensive and universalistic welfare state and increased decommodification. France integrated platform workers into the dualised labour market which maintained the stratified nature of society. The UK continued its commitment to the market by incorporating platform workers into the gig economy of flexible and low protection workers whilst providing insufficient social protection. Additionally, no policy change was triggered in the three cases with continuation being the theme. Although, the inaction of French and British policy makers may lead to policy drift in the future. Therefore, the social policy response of the three case studies followed the respective welfare regime and did not trigger social policy change.

The findings suggest that the future for the majority of platform workers may be a struggle. The overall trend in Western countries towards the platform economy has been one of inaction and the acceptance of unprotected platform work. The normalisation of unprotected platform work poses serious risks to the labour market in the future. To allow for platform work in its current state to become the norm would signal a green light to companies to push for reduced protection throughout the labour market. This could lead to an overall reduction in social protection for a significant section of the labour market. A consequence of such a trend would be a further increase in inequality in western countries. However, Denmark has demonstrated that platform work does not need to be unprotected. The government and unions have demonstrated that social protection can be provided to platform workers without changing their employment status. More importantly, the Hilfr/3F collective agreement was a significant step in normalising the idea of platform workers as employees and platform workers being employers and not simply managers of an online platform. In addition, the thesis highlights the importance of policies developed today and the impact they will have on the future. It demonstrates the need for platform workers to have social protection as part of an effort to develop a framework that can be used for new forms of work that come about from technological progress in the future. Yet, this thesis is not deterministic. Interest groups and

policy makers have the power to change policy directions and are encouraged to do. Overall, platform workers face a bleak future unless policy makers begin to take action to provide them with social protection and hold platform companies accountable.

6.1. Recommendations

The recommendations from this thesis are not utopian but are grounded in the two trajectories of social policy development action and inaction. For the three cases studied Denmark should follow its current trajectory to provide comprehensive social protection for platform workers. The next steps for France and the UK are more complex as they have taken little social policy action in response to the platform economy. The policy recommendation for Denmark is for an expansion of collective agreements based on the Hilfr/3F model which will lead to comprehensive social protection, including the three key social policies, for all platform workers. Whilst France and the UK must take greater social policy action on employment categorisation, wages and welfare benefits.

To date France and the UK have been able to integrate platform work into the welfare system but this has left platform workers with low protection. Platform workers do not have the same freedom and control over their work as other self-employed workers, leaving them disadvantaged when engaging with social policy for the self-employed. As has been demonstrated, French platform workers have no access to unemployment insurance and in practise the pension plan and sick leave are ineffective. In the UK platform workers have low unemployment insurance and no sick leave along with poor quality pension coverage. Considering the instability of platform work the integration of platform workers has left them extremely vulnerable. Thus, inaction is not a viable policy option as it leads to a growing section of the labour market with severe deficiencies in social protection coverage.

An overly simplistic claim would be to recommend the redefinition of platform workers to employees in order for them to access full benefits, but this would be unrealistic. The findings of this thesis demonstrated that a third category of worker is not an effective solution to the social policy challenges of the platform economy. Prior to the arrival of the platform economy the UK already had a well-established third employment category that was used greatly in the gig economy. However, platform companies were unwilling to utilise the third category, rather maintaining their argument that platform workers were self-employed. A likely explanation is

the added costs associated with platform workers being defined as workers. Moreover, British platform workers being placed in the third category would strengthen their argument that they are employees leading to further costs for platform companies. Therefore, a third employment category is not the solution for the low social protection that platform workers have.

A base wage must be established in order for any social policy scheme to function effectively due to the reliance of these programmes on contributions. Income should be automatically reported along with automatic enrolment in social protection programmes. The effects of these reforms will be an increase in efficiency and effectiveness in both countries. Finally, France and the UK should develop a sick leave programme with contributions by platform companies, the government and platform workers as individuals in the platform economy must be supported when they fall ill.

6.2. Policy recommendations

Denmark

Denmark has developed effective social policies that have ensured greater social protection for platform workers. In order for platform workers to obtain comprehensive social protection there should be efforts made to replicate the Hilfr/3F collective agreement. If platform companies are unwilling to do so the government should apply pressure in order for the Danish welfare state's tradition of being comprehensive and universalist to be maintained. The greater the number of collective agreements that can be developed, the greater pressure there will be on the major platform companies to accept such agreements in order to access the Danish market. An example is Uber who led the campaign for platform companies to have no social policy commitments. Moreover, Danish policymakers should continue their focus on obtaining tax payment from platform companies as that is the foundation of the social-democratic welfare regime. Although platform workers in Denmark have high social protection in comparison to those in other countries, yet the government must expand collective agreements to cover all individuals in the platform economy and ensure comprehensive protection.

France and the UK

In order for social policies to function properly platform workers must be paid a fair wage that is both sustainable and can contribute towards social programmes. Research on the platform economy has demonstrated that platform workers regularly earn considerably less than

employees and their wages fluctuate (Farrell and Greig 2016, pp.9). Under such conditions it is very difficult to contribute towards social protection schemes. Platform companies are able to perfectly match demand by having a flexible labour force. Platform workers are currently bearing the burden of this flexibility and little of the benefit. Platform companies must finance the flexibility they want by paying a base hourly rate which is subsistent. Workers should be available on the app for the whole hour and engaged in a task for at least 40% of the hour. By providing greater stability of income platform workers will be able to afford to pay into social protection programmes. Therefore, a stable hourly pay should be provided by platform companies to enable platform workers to provide higher and more regularly contributions to social programmes.

The easiest policy recommendation to implement is the automatic reporting of earnings and enrolment into social policy programmes. Platform companies should be made to provide data on the amount platform workers earn per week in order for social protection systems to have insight into their earnings. This system would allow unemployment insurance administrators to see when platform workers have not been able to earn enough. By identifying the amount of earnings a platform worker has received, they can calculate whether they need unemployment benefits and if so, how much. Such a system would be suitable for those workers who are multijobbing as the income would be combined. Moreover, platform workers should not be left to register for social programmes themselves. Welfare state programmes are complicated and so automatic enrolment would take the onus off of platform workers. An option to opt out can still be provided. Finally, platform workers should be able to access their social programmes on the platform app in order for them to have insight into their pension, unemployment contribution (in non-liberal welfare regimes) and sick leave. Flexibility must go both ways and not simply be a luxury for platform companies. Thus, automatic reporting of income and automatic enrolment in social programmes would decrease the gaps in coverage that is currently pervasive among platform workers.

In France, there is a need for a clarification of employment categorisation and the inclusion of platform workers in an unemployment insurance scheme. The current welfare state is extremely confusing due to the variety of self-employment categories and the differing programmes associated with said categories. At the very least, policy makers need to provide clear information on the social protection that platform workers have a right to access, and how they can access those programmes. If the automatic enrolment system is used, then all this

information can be provided through the app. The Supreme Court ruling on courier platform workers as employees may lead to similar rulings and the eventual integration of platform workers into the employee category. Yet, policy makers must act now and not simply rely on the courts. Furthermore, an unemployment scheme must be established by the state, which could be a private scheme, that platform workers can contribute towards and are automatically enrolled in. Otherwise platform workers are solely reliant on their work from platform companies if they are not multijobbing. Currently, if platform workers do not earn a subsistent income they are left in poverty without any support. Therefore, there is a need for clarification of the precise employment category that platform workers fall into and the rights associated with that categorisation. Also, platform workers should be automatically enrolled into an unemployment scheme with automatic contributions.

In the UK, automatic reporting and enrolment would allow for greater efficiency of social programmes. By obtaining real time earnings of platform workers, unemployment benefit can be paid out when their earnings are insufficient. Technology can be used to carry out the means-testing of platform workers. That way platform workers do not bear all the burden of platform companies' drive for flexibility. As a result, governments will have to finance shortcomings in platform workers' earnings which may lead policy makers to act in different ways and hold platform companies to account. Moreover, a private pension scheme should be established for all platform workers as the state pensions are insufficient. A union, such as the IWGB, should take this opportunity to increase their influence and follow the Danish example by collaborating with private insurance companies to create a programme. By pooling the resources of platform workers a significant fund could be developed and managed. Thus, currently the most achievable policy reform to provide sufficient unemployment insurance for platform workers is through a more reactive system that will support platform workers with fluctuations in pay. This would require a private pension plan to be established that platform workers are automatically enrolled in.

Sick leave

In France and the UK a sick leave fund should be established which is financed by platform workers, platform companies and the government. Platform companies make money by having a group of workers available when demand increases. If an individual is unwell and cannot work they should be supported. Each platform worker should be given five days per year with a daily payment rate of the base pay per hour times seven. A doctor's certificate would be

required that can be scanned into the app and sent to the administrators of the app in order to qualify for sick leave. If platform workers develop a serious illness they should be moved onto state disability insurance. Thus, a sick leave programme must be developed for platform workers so that they are not penalised for being unwell.

6.3. Conclusion

Overall, greater policy action on social protection for platform workers is required by France and the UK than Denmark. Denmark should follow its current trajectory and expand collective agreements to cover more platform workers, which will provide comprehensive social protection. For France and the UK in the second category greater action is required because inaction has been ineffective.

The recommendations from this thesis are:

1. Denmark should follow its current trajectory and expand collective agreements to cover more platform workers to provide comprehensive social protection.
2. France and the UK should establish a base rate of pay for platform workers to make contributory social protection schemes effective.
3. France and the UK should implement automatic income reporting and enrolment in unemployment insurance and pension schemes to increase both access to social protection and increase the benefit level available
4. The UK should utilise the automatic system to increase the efficiency of social policy delivery and stabilise the pay fluctuations that platform workers face.
5. France should clarify employment categories for platform workers and inform them of their social rights
6. France and the UK should establish a sick leave scheme to support platform workers when they are unwell.

There is a need for considerable research in the future. Research into social policy development for the platform economy should be expanded to analyse the policy process of countries in North America and Southern and Eastern Europe in order to expand our understanding of the impact of platform work and how governments are reacting. Moreover, research should be conducted on platform unions and their efforts to obtain fair pay, conditions and social protection in order to better understand the dynamics of social dialogue between platform

workers and platform companies. The focus of this thesis was on demand appwork but crowdwork also requires attention. Crowdworkers are mainly based in the developing world and future research should analyse their working conditions, pay and protection. Therefore, there are a number of avenues that require attention in order to develop an understanding of the platform economy.

Bibliography

Abdelnour, S. and Bernard, S. (2018). 'Statuts et protection sociale des travailleurs des plates-formes. Les cas des auto-entrepreneurs et des chauffeurs de transports de personnes'. *In* DREES (Direction de la recherche, des études, de l'évaluation et des statistiques). *Formes d'économie collaborative et protection sociale*.

Abend, L. (2019). 'An island for 'unwanted' migrants is Denmark's latest aggressive anti-immigrant policy'. *Time*. Available at: http://time.com/5504331/denmark-migrants-lindholm-island/. (Accessed: 12th April 2019).

Adermon, A. and Gustavsson, M. (2015). 'Job polarization and task-biased technological change: Evidence from Sweden, 1975–2005'. *The Scandinavian Journal of Economics*, Vol 117(3), pp.878-917.

Akademikerne. (2017).'Kommissorium: Ekspertpanel for platformsøkonomi'. http://www.ac.dk/media/681649/ekspertpanel-platform_kommissorium.pdf. (Accessed: 13th April 2019).

Akgüç, M. (2018). *Industrial Relations and Social Dialogue in the Age of Collaborative Economy (IRSDACE): National Report France.* Brussels: Centre for European Studies.

Amar, N. and Viossat, L. (2016). *Les plateformes collaboratives, l'emploi et la protection sociale*. Inspection Générale des Affaires Sociales (IGAS).

Andersen, S., Kaine, S. and Lansbury, R. (2017). 'Decentralised bargaining in Denmark and Australia: Voluntarism versus legal regulation'. *Australian Bulletin of Labour*, Vol 43(1), p.45-70.

Anderson, C., Leahy, M., DelValle, R., Sherman, S. and Tansey, T. (2014). 'Methodological application of multiple case study design using modified consensual qualitative research (CQR) analysis to identify best practices and organizational factors in the public rehabilitation program'. *Journal of Vocational Rehabilitation*, Vol 41(2), pp.87-98.

Balaram, B., Warden, J. and Wallace-Stephens, F. (2017). *Good gigs: A fairer future for the UK's gig economy*. London: RSA (Action and Research Centre).

Baumgartner, F. and Jones, B. (2010). *Agendas and instability in American politics*. Chicago: University of Chicago Press.

Baxter, P. and Jack, S. (2008). 'Qualitative case study methodology: Study design and implementation for novice researchers'. *The Qualitative Report*, Vol 13(4), pp.544-559.

BBC. (2018a). 'Uber loses latest legal bid over driver rights'. *BBC News.* Available at: https://www.bbc.com/news/business-46617584. (Accessed: 15th April 2019).

BBC. (2018b). 'Workplace reforms 'will protect gig economy workers''. *BBC News.* Available at: https://www.bbc.com/news/business-46586623. (Accessed: 6th March 2019).

BBC. (2018c). ‘Uber drivers stage UK strikes over pay and conditions’. *BBC News.* Available at: https://www.bbc.com/news/business-45796409. (Accessed: 15th April 2019).

BBC. (2016). ‘Hollande 'won't give in' amid labour reforms protests’. *BBC News*. Available at: https://www.bbc.com/news/world-europe-36311275. (Accessed: 12th April 2019).

Benner, M. and Vad, T. (2000). ‘Sweden and Denmark: defending the welfare state’. In Scharpf, F. and Schmidt, V. (eds). *Welfare and work in the open economy: volume II: Diverse responses to common challenges in twelve countries*. Oxford: OUP.

Béland, D. (2005). ‘Ideas and social policy: An institutionalist perspective’. *Social Policy and Administration*, Vol 39(1), pp.1-18.

Béland, D. (2016). 'Ideas and institutions in social policy research'. *Social Policy and Administration*, Vol 50(6), pp.734-750.

Béland, D. and Cox, R. (eds). (2011). *Ideas and Politics in Social Science Research*. New York: Oxford University Press.

Béland, D. and Powell, M. (2016). ‘Continuity and change in social policy’. *Social Policy and Administration*, Vol 50(2), pp.129-147.

Berg, J. (2015). "Income security in the on-demand economy/ Findings and policy lessons from a survey of crowdworkers". *Comparative Labour Law and Policy Journal*, Vol 37, p.543-576.

Berg, J. and Johnston, H. (2019). ‘Too Good to Be True? A Comment on Hall and Krueger’s Analysis of the Labor Market for Uber’s Driver-Partners.’ *Industrial and Labor Relations Review*, Vol 72(1), pp.39-68.

Berman, S. (2013). ‘Ideational theorizing in the social sciences since “Policy Paradigms, Social Learning, and the State”’. *Governance,* Vol 26(2), pp.217–37.

Bevort, A. (2012). ‘Active/participatory Citizenship: the French Paradox’. *Seminar: The Effect of Austerity on Active Citizenship in Europe*. Available at: http://www.eiesp.org/hosting/a/admin/files/ABevort_ActiveCitizenshipFrench%20paradox_final. (Accessed: 8th April 2019).

Bjørn, H. and Høj, A. (2014). ‘Understøttelse ved Ledighed i Syv Lande’. *Arbejdspapir,* (2). Copenhagen: De Økonomiske Råd.

Bloch, C. and Rask Mikkelsen, M. (2014). ‘Styrelse melder Uber til politiet’. *Berlingske*. Available at: https://www.berlingske.dk/virksomheder/styrelse-melder-uber-til-politiet. (Accessed: 1st March 2019).

Bond, S. and Bollock, N. (2019). ‘Uber shares close nearly 8% below IPO price’. *Financial Times.* Available at: https://www.ft.com/content/01579114-72b8-11e9-bf5c-6eeb837566c5. (Accessed: 11th May 2019).

Bonoli, G. (2007). 'Time matters: Postindustrialization, new social risks, and welfare state adaptation in advanced industrial democracies'. *Comparative political studies*, Vol 40(5), pp.495-520.

Bonoli, G. (2012). 'Active labour market policy and social investment: a changing relationship'. Chp 7 in Morel, N., Palier, B. and Palme, J. (eds). *Towards a new social investment welfare state? Ideas, policies and challenges.* Bristol: Polity Press.

Bpifrance Création. (2019). 'La protection sociale du micro-entrepreneur (auto-entrepreneur)'. Available at: https://bpifrance-creation.fr/encyclopedie/micro-entreprise-regime-auto-entrepreneur/fiscal-social-comptable/protection-sociale. (Accessed: 1st March 2019).

Bredgaard, T. and Madsen, P. (2018). 'Farewell flexicurity? Danish flexicurity and the crisis'. *European Review of Labour and Research*, Vol 24(4), pp.375-386.

Bredgaard, T. and Daemmrich, A. (2012). *The welfare state as an investment strategy: Denmark's flexicurity policies*. ILERA 2012 Congress in Philadelphia, USA. pp.2-22.

Bridgwater, A. (2015). 'Derfor blev min tillid til deleøkonomien brudt'. *Politiken.* Available at: https://politiken.dk/debat/art5599737/Derfor-blev-min-tillid-til-dele%C3%B8konomien-brudt. (Accessed: 1st March 2019).

British Government. (2019a). 'Self-employed National Insurance rates'. *Gov.uk.* Available at: https://www.gov.uk/self-employed-national-insurance-rates. (Accessed: 15th April 2019).

British Government. (2019b). 'Employment status'. *Gov.uk.* Available at: https://www.gov.uk/employment-status/selfemployed-contractor. (Accessed: 15th April 2019).

British Government. (2019c). 'Universal credit'. *Gov.uk.* Available at: https://www.gov.uk/universal-credit. (Accessed: 15th April 2019).

British Government. (2019d). 'Jobseeker's Allowance (JSA)'. *Gov.uk.* Available at: https://www.gov.uk/jobseekers-allowance/eligibility. (Accessed: 15th April 2019).

Bryman, A. (2016). *Social research methods*. 4th Ed. Oxford: Oxford university press.

Butler, S. (2018). 'Uber loses appeal over driver employment rights'. *The Guardian.* Available at: https://www.theguardian.com/technology/2018/dec/19/uber-loses-appeal-over-driver-employment-rights. (Accessed 19 March 2019).

Cambridge Dictionary. (2019). 'Gig Economy'. *dictionary.cambridge.org.* Available at: https://dictionary.cambridge.org/dictionary/english/gig-economy. (Accessed: 15th April 2019).

Cameron, D. (1978). "The Expansion of the Public Economy: A Comparative Analysis." *American Political Science Review*, Vol 72, pp.1243–61.

Campbell J. (2004). *Institutional Change and Globalization*. Princeton, NJ: Princeton University Press.

Castles, F. (1982). *The Impact of Parties on Public Expenditures*. Beverley Hills, California: Sage.

Centre des Liaisons Européennes et Internationales de Sécurité Sociale. (2019). 'France's social security scheme for self-employed workers'. *CLEISS.fr.* Available at: https://www.cleiss.fr/docs/regimes/regime_france_independants_en.html#cotisations. (Accessed: 29th March 2019).

Christoffersen, H., Beyeler, M., Eichenberger, R., Nannestad, P. and Paldam, M. (2013). *The good Society: A Comparative study of Denmark and Switzerland*. Berlin: Springer.

Composton, H. (1995). 'Union Participation in economic policy making in Scandinavia, 1970–1993'. *West European Politics*, Vol 18(1), pp.98-115.

Conger, K. and de la Merced, M. (2019). 'Lyft's Shares Jump in Trading Debut, Cementing Rise of the Gig Economy'. *The New York Times*. Available at: https://www.nytimes.com/2019/03/29/technology/lyft-stock-price.html?module=inline. (Accessed: 9th May 2019).

Conger, K., Xiuzhong Xu, V. and Wichter, Z. (2019). 'Uber Drivers' Day of Strikes Circles the Globe Before the Company's I.P.O.'. *New York Times.* Available at: https://www.nytimes.com/2019/05/08/technology/uber-strike.html. (Accessed: 8th May 2019).

Cork, C. (2018). 'Deliveroo riders stage protest and descend on Bristol offices'. *Bristol Post.* Available at: https://www.bristolpost.co.uk/news/bristol-news/city-comes-standstill-deliveroo-riders-2328918. (Accessed: 15th April 2019).

Coulter, M. (2018). 'Uber loses key Court of Appeal hearing on worker rights'. *Financial Times.* Available at: https://www.ft.com/content/7cdcf52c-03a5-11e9-9d01-cd4d49afbbe3. (Accessed: 15th April 2019).

Crepaz, M. (1996). 'Consensus versus majoritarian democracy: political institutions and their impact on macroeconomic performance and industrial disputes'. *Comparative political studies*,Vol 29(1), pp.4-26.

Creswell, J. (2003). *Research design: Qualitative, quantitative and mixed methods approaches*. 2nd ed. Thousand Oaks, CA: Sage.

Creswell, J. and Poth, C. (2017). *Qualitative inquiry and research design: Choosing among five approaches*. London: SAGE publications.

Christiansen, P.M., Nørgaard, A.S., Rommetvedt, H., Svensson, T., Thesen, G. and Öberg, P. (2010). 'Varieties of democracy: Interest groups and corporatist committees in Scandinavian policy making". Voluntas: International Journal of Voluntary and Nonprofit Organizations, Vol 21(1), pp.22-40.

Daigneault, P. (2014). 'Reassessing the concept of policy paradigm: aligning ontology and methodology in policy studies'. *Journal of European Public Policy*, Vol 21(3), pp.453-469.

Danish Parliament. (2017). 'L 88 Forslag til lov om ændring af lov om arbejdsløshedsforsikring m.v.'. *Folketinget*. Available at: https://www.ft.dk/samling/20171/lovforslag/l88/index.htm. (Accessed: 2nd April 2019).

Degryse, C. (2016). 'Digitalisation of the economy and its impact on labour markets'. *ETUI Research Paper-Working Paper.*

Denzin, N. and Yvonna, L. (2005). 'Introduction: The Discipline and Practice of Qualitative Research.' In. Denzin, N. and Yvonna, L. (eds). *The Sage Handbook of Qualitative Research*. 3rd Ed. Thousand Oaks: SAGE Publications.

Department for Business, Energy and Industrial Strategy. (2016). 'Trade Union Membership 2016 Statistical Bulletin'. *UK Government.* Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/616966/trade-union-membership-statistical-bulletin-2016-rev.pdf. (Accessed: 9th April 2019).

Department for Work and Pensions. (2019). 'Your state pension explained'. *Gov.uk*. Available at: https://www.gov.uk/government/publications/your-new-state-pension-explained/your-state-pension-explained. (Accessed: 15th April 2019).

Devernay, N., Fielder, B. and Ivey, C. (2018). 'Delivery riders are employees, not self-employed workers, according to a French Supreme Court ruling'. *Bird and Bird*. Available at: https://www.twobirds.com/en/news/articles/2018/france/delivery-riders-are-employees-not-self-employed-workers-according-to-a-french-supreme-court-ruling. (Accessed: 21st April 2019).

Donini, A., Forlivesi, M., Rota, A. and Tullini, P. (2017). 'Towards collective protections for crowdworkers- Italy, Spain and France in the EU context'. *Transfer- European Review of Labour and Research*, Vol 23(2), pp.207-223.

Due, J. and Madsen, J.S. (2008). 'The Danish model of industrial relations: Erosion or renewal?'. *Journal of Industrial Relations*, Vol 50(3), pp.513-529.

Durand, C. (2016). 'Emmanuel Macron s'en prend à Uber: « Je ne suis pas un uberolâtre »'. *Numerama.* Available at: https://www.numerama.com/politique/206124-emmanuel-macron-sen-prend-a-uber-je-ne-suis-pas-un-uberolatre.html. (Accessed: 12th April 2019)

Edmiston, D. (2017). 'Welfare, austerity and social citizenship in the UK'. *Social Policy and Society*, Vol 16(2), pp.261-270.

Eisenhardt, K. and Graebner, M. (1989). 'Theory building from case study research'. *Academy of Management Review*, Vol 14(4), pp.532-550.

Elkrog Friis, S. (2018). 'Hilfr-overenskomst kritiseres for at underminere den danske model'. *Altinget.* Available at: https://www.altinget.dk/artikel/hilfr-overenskomst-kritiseres-for-at-underminere-den-danske-model. (Accessed: 27th February 2019).

Elliot, L. (2018). 'TUC wants clampdown on 'poverty pay' in gig economy jobs'. *The Guardian.* Available at: https://www.theguardian.com/business/2018/sep/28/tuc-wants-clampdown-on-poverty-pay-in-gig-economy-jobs. (Accessed: 9th April 2019).

Emmenegger, P., Häusermann, S., Palier, B. and Seeleib-Kaiser, M. (2012). 'How we grow unequal'. Chp 2. in Emmenegger, P., Häusermann, S., Palier, B. and Seeleib-Kaiser, M. *The age of dualization: The changing face of inequality in deindustrializing societies.* Oxford: Oxford University Press.

Espadinha, M. (2018a). 'Uber drivers entitled to workers' rights'. *FTAdvsior*. Available at: https://www.ftadviser.com/pensions/2018/12/20/uber-drivers-entitled-to-workers-rights/. (Accessed: 15th April 2019).

Espadinha, M. (2018b). 'Govt confirms deadline for self-employed pensions paper. *FTAdvsior*. Available at: https://www.ftadviser.com/pensions/2018/12/17/govt-confirms-deadline-for-self-employed-pensions-paper/. (Accessed: 15th April 2019).

Esping-Andersen, G. (1985). *Politics against Markets: The Social Democratic Road to Power*. Princeton, NJ: Princeton University Press.

Esping-Andersen, G. (1990). *The Three Worlds of Welfare Capitalism*. Cambridge: Polity Press.

Esping-Andersen, G. (2002). 'Towards the good society, once again?'. Chp 1 in Esping-Andersen, G. *Why we need a new welfare state*. England: Oxford University Press

Eurostat. (2019). 'Unemployment statistics'. *Europa.eu.* Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php/Unemployment_statistics. (Accessed: 12th April 2019).

Evans, C. (2017). 'UK: Taylor Review recommendations and the mixed reactions of the social partners'. *Eurofound.* Available at: https://www.eurofound.europa.eu/fr/publications/article/2017/uk-taylor-review-recommendations-and-the-mixed-reactions-of-the-social-partners. (Accessed: 15th April 2019).

Fabo, B., Karanovic, J. and Dukova, K. (2017). 'In search of an adequate European policy response to the platform economy'. *Transfer: European Review of Labour and Research*, Vol 23(2), pp.163-175.

Fagbevægelsens Hovedorganisation. (2016a). 'EU-kommissionen bør holde mere snor i platformsøkonomien'. *Fagbevægelsens Hovedorganisation.* Available at: https://fho.dk/blog/2016/06/16/eu-kommissionen-boer-holde-mere-snor-i-platformsoekonomien/. (Accessed: 26th February 2019).

Fagbevægelsens Hovedorganisation. (2016b). 'Politikerne må gribe ind overfor platugleøkonomi'. *Fagbevægelsens Hovedorganisation.* Available at: https://fho.dk/blog/2016/06/18/politikerne-maa-gribe-ind-overfor-platugleoekonomi/. (Accessed: 26th February 2019).

Fagbevægelsens Hovedorganisation. (2017). 'Platforme: Regeringens plan? et godt udgangspunkt'. *Fagbevægelsens Hovedorganisation*. Available at: https://fho.dk/blog/2017/10/10/platforme-regeringens-plan-et-godt-udgangspunkt/. (Accessed 26th February 2019).

Fagbevægelsens Hovedorganisation. (2018). 'Historic agreement: Digital platform concludes collective agreement. *Fagbevægelsens Hovedorganisation.* Available at: https://fho.dk/blog/2018/04/10/historic-agreement-digital-platform-concludes-collective-agreement/. (Accessed: 13th April 2019).

Fagligt Fælles Forbund. (2018). 'Arbejdsmarkedspension' *3f.dk*. Available at: https://www.3f.dk/fagforening/pension/arbejdsmarkedspension. (Accessed: 13th April 2019).

Farrell, S. (2016). 'The UK firms reliant on the gig economy'. *The Guardian*. Available at: https://www.theguardian.com/money/2016/sep/06/uk-firms-reliant-on-gig-economy-uber-deliveroo-. (Accessed: 16th March 2019).

French Government. (2015). 'La French Tech'. *gouvernement.fr.* Available at: https://www.gouvernement.fr/en/la-french-tech. (Accessed: 9th April 2019).

Forde, C., Stuart, M., Joyce, S., Oliver, L., Valizade, D., Alberti, G., Hardy, K., Trappmann, V., Umney, C. and Carson, C. (2017). *The social protection of workers in the platform economy*. Directorate General For Internal Policies, Policy Department A: Economic And Scientific Policy. European Parliament.

Fulton, L. (2013). 'Worker representation in Europe'. Labour Research Department and ETUI. Available at: https://www.worker-participation.eu/index.php/National-Industrial-Relations/Countries/United-Kingdom/Collective-Bargaining. (Accessed: 9th April 2019).

Fulton, L. (2015). 'Worker representation in Europe'. *Labour Research Department and ETUI*. Available at: https://www.worker-participation.eu/National-Industrial-Relations/Countries/Denmark/Trade-Unions. (Accessed: 9th April 2019).

Fulton, L. (2013). 'Worker representation in Europe'. Labour Research Department and ETUI. Available at: https://www.worker-participation.eu/index.php/National-Industrial-Relations/Countries/United-Kingdom/Collective-Bargaining. (Accessed: 9th April 2019).

Gaffney, J. (1988). 'Presidentialism and the Fifth Republic'. in Gaffney, J. *The French Presidential Election of 1988: ideology and leadership in contemporary France*. Dartmouth: Brookfield.

Gaffney, D. (2015). 'Welfare states: How generous are British benefits compared with other rich nations?' *Trade Union Congress*. Available at: https://www.tuc.org.uk/sites/default/files/Welfare_States_Touchstone_Extra_2015_AW_Rev.pdf.

Garben, S. (2017). *Protecting workers in the online platform economy: An overview of regulatory and policy developments in the EU*. Bilbao: European Agency for Safety and Health at Work.

George, A., Bennett, A., Lynn-Jones, S. and Miller, S. (2005). *Case studies and theory development in the social sciences.* Massachusetts: MIT Press.

Ginsburg, N. (1979). *Class, capital and social policy*. London: Macmillan.

Goos, M., Manning, A. and Salomons, A. (2009). 'Job polarization in Europe'. *American Economic Review*, Vol 99(2), pp.58-63.

Gore-Coty, P. (2018). 'Ensuring independent drivers are not on their own'. *Uber.* Available at: https://www.uber.com/en-CA/newsroom/ensuring-independent-drivers-not-on-their-own/?utm_term=2zU09F14jxyJTu60OGSitWCIUklzqB33F1T2040&adg_id=218769&cid=10078&utm_campaign=affiliate-ir-Skimbit%20Ltd._1_-99_national_D_all_ACQ_cpa_en&utm_content=&utm_source=affiliate-ir. (Accessed: 15th April 2019).

Gough, I. (1979). *The political economy of the welfare state*. London: Macmillan.

Goury, R. (2018). 'France: A Self-Employed Delivery Rider Working For An Online Platform May Be Considered To Be An Employee'. *Mondaq.* Available at: http://www.mondaq.com/france/x/762930/Employee+Benefits+Compensation/A+SelfEmployed+Delivery+Rider+Working+For+An+Online+Platform+May+Be+Considered+To+Be+An+Employee. (Accessed: 4th March 2019).

Graham, M., Hjorth, I. and Lehdonvirta, V. (2017). 'Digital labour and development- impacts of global digital labour platforms and the gig economy on worker livelihoods'. *European Review of Labour and Research*, Vol 23(2), pp.135-162.

Greenacre, N., Jaurett, A., Ménard, V. and Taylor, S. (2017). 'France: Macron's Reforms to the French Labor Code'. *White and Case.* Available at: https://www.whitecase.com/publications/alert/france-macrons-reforms-french-labor-code. (Accessed: 12th April 2019).

Gustafsson, J. (2017). *Single Case Studies vs. Multiple Case Studies: A Comparative Study.* Halmstad, Sweden: Academy of Business, Engineering and Science Halmstad University.

Hacker, J. (2004). 'Privatizing Risk without Privatizing the Welfare State- The Hidden Politics of Social Policy Retrenchment in the United States'. *American Political Science Review*, Vol 98, pp.243-60.

Hadjú, J. (2013). 'The cradle of the European unemployment insurance: the Ghent system' in Balogh, E. and Homoki-Nagy, M. *Opuliai László: nádor proskribáló oklevele*. Comissio Scientiae Studiorum Facultatis Scientiarum Politicarum et Juridicarum Universitatis Szegediensis.

Hall, P. (1993). 'Policy paradigms, social learning and the state'. *Comparative Politics*, Vol 25, pp.275-296.

Hall, P. and Taylor, R. (1996). 'Political science and the three institutionalisms'. *Max-Planck-Institut für Gesellschaftsforschung Discussion Paper*, Vol 96(6), pp.1-32.

Hassenteufel, P. and Palier, B. (2016). 'The French Welfare System'. in Elgie, R., Grossman, E. and Mazur, A.G. eds. *The Oxford handbook of French politics*. Oxford: Oxford University Press.

Hemerijck, A. (2002). 'Self-transformation of the Euroepan Social Model(s). Chp 6 in Esping-Andersen, G., Gallie, D., Hemerijck, A. and Myles, J. (eds). *Why we need a new welfare state*. Oxford University Press, USA.

Hendeliowitz, J. and Woollhead, C.B. (2007). 'Employment policy in Denmark-high levels of employment, flexibility and welfare security'. *Local governance for promoting employment*.

Hesseldahl, P. (2015). 'Uber og Airbnb er en helt ny type arbejdsgiver'. *Politiken*. Available at: https://politiken.dk/debat/art5586875/Uber-og-Airbnb-er-en-helt-ny-type-arbejdsgiver. (Accessed: 31st March 2019).

Hicks, A, and Swank, D. (1984). "On the Political Economy of Welfare Expansion: A Comparative Analysis of Eighteen Advanced Capitalist Democracies, 1960–1971." *Comparative Political Studies*, Vol 17, pp.81–118.

HK. (2016). 'Få Mere For Pengene, Når Du Selv Sparer Op Til Pension'. *HK.dk*. Available at: https://www.hk.dk/aktuelt/nyheder/2016/08/18/faa-mere-for-pengene-naar-du-selv-sparer-op-til-pension. (Accessed: 13th April 2019).

Howlett, M. and Cashore, B. (2009). 'The dependent variable problem in the study of policy change: Understanding policy change as a methodological problem'. *Journal of Comparative Policy Analysis*, Vol 11(1), pp.33-46.

Häusermann, S. and Schwander, H. (2012). 'Varieties of Dualization. Labor Market Segmentation and Insider-Outsider Divides Across Regimes'. Chp 2 in Emmenegger, P., Häusermann, S., Palier, B. and Seeleib-Kaiser, M. (eds). *The age of dualization: the changing face of inequality in deindustrializing societies*. Oxford: Oxford University Press.

Ilsøe, A. (2018). 'Denmark: Progressing the voluntarist approach'. in Neufeind, M., O'Reilly, J. and Ranft, F. (eds). *Work in the digital age - challenges of the fourth industrial revolution*. London, UK: Rowman and Littlefield.

Ilsøe, A. and Madsen, L. (2018). *Industrial Relations and Social Dialogue in the Age of Collaborative economy*. (IRSDACE): National Report Denmark.

Information. (2015). 'Fagbevægelsen vil gå i dialog med omstridt taxitjeneste'. *Information.* Available at: https://www.information.dk/telegram/2015/12/fagbevaegelsen-gaa-dialog-omstridt-taxitjeneste. (Accessed: 1st March 2019).

Information. (2016). 'Rengøringsarbejde for app tæller ikke med i 225-timers-regel'. *Information.* Available at: https://www.information.dk/telegram/2016/11/rengoeringsarbejde-app-taeller-225-timers-regel. (Accessed: 1st March 2019).

IPSE. (2019). "The Taylor Review". *The Association of Independent Professionals and the Self Employed*. Available at: https://www.ipse.co.uk/about-us/who-we-are.html. (Accessed: 15th April 2019).

Jacobs, M. and Weaver, R. (2015). "When Policies Undo Themselves: Self-Undermining Feedback as a Source of Policy Change." *Governance,* Vol 28(4), pp.441–57.

Jolly, C. and Prouet, E. (2016). *L'avenir du travail: quelles redefinitions de l'emploi, des statuts et des protections?* Paris: France Stratégie.

Jöhncke, S. (2011). 'Integrating Denmark: The Welfare State as a National(ist) Accomplishment'. in Olwig, K. and Paerregaard, K. (eds). *The Question of Integration, Immigration, Exclusion and the Danish Welfare State*. Newcastle, UK: Cambridge Scholars Publishing.

Kjellberg, A. and Ibsen, C.L. (2016). 'Attacks on union organising: Reversible and irreversible changes to the Ghent systems in Sweden and Denmark'. In Larsen, T. and Ilsøe, A. (Eds.). *Den Danske Model set udefra: komparative perspektiver på dansk arbejdsmarkedsregulering*, (pp.279-302). København: Jurist- og Økonomforbundets Forlag

Kangas, O. (1991). *The Politics of Social Rights: Studies on the Dimensions of Sickness Insurance in OECD Countries*. Stockholm: Swedish Institute for Social Research.

Kerr, C., Dunlop, J., Harbison, F. and Myers, C. (1960). *Industrialism and Industrial Man: The Problems of Labor and Management in Economic Growth*. New York: Oxford University Press.

Korpi, W. (1983*). The Democratic Class Struggle*. London: Routledge.

Knight, S. (2016). 'How Uber conquered London'. *The Guardian.* Available at: https://www.theguardian.com/technology/2016/apr/27/how-uber-conquered-london. (Accessed: 19th April 2019).

Kvist, J. (2017). 'Denmark: A new unemployment insurance scheme for the future labour market'. European Social Policy Network Flash Report. *European Commission*.

Lane, J. and Ersson, S. (2003). 'French politics: the virtues of majoritarian democracy'. *French Politics*, Vol 1(1), pp.119-134.

Legal Place. (2019). 'Auto-entrepreneur et sécurité sociale'. *Legalplace.fr.* Available at: https://www.legalplace.fr/guides/auto-entrepreneur-securite-sociale/. (Accessed: 21st April 2019).

Lewis, J. (2001). 'The decline of the male breadwinner model: Implications for work and care'. *Social Politics: International Studies in Gender, State and Society*, Vol 8(2), pp.152-169.

Le Parisen. (2017). 'Echec des négociations entre Uber et les organisations de VTC'. *Leparisien.fr*. Available at: http://www.leparisien.fr/flash-actualite-economie/uber-et-les-

organisations-de-vtc-discutent-des-tarifs-15-03-2017-6764247.php. (Accessed: 21st April 2019).

Lepanjuuri, K., Wishart, R. and Cornick, P. (2018). *The characteristics of those in the gig economy.* UK: Department for Business, Energy and Industrial Strategy.

Lhernould, J. (2018). *Employment and working conditions of selected types of platform work-National context analysis France*. Eurofound.

Lichfield, J. (2018). 'The gilets jaunes have cowed Macron. But for them, that's just the start'. *The Guardian.* Available at: https://www.theguardian.com/commentisfree/2018/dec/11/gilets-jaunes-emmanuel-macron-french-rebels. (Accessed: 12th April 2019).

Lijphart, A. and Crepaz, M.M. (1991). 'Corporatism and consensus democracy in eighteen countries- Conceptual and empirical linkages'. *British Journal of political science*, Vol 21(2), pp.235-246.

Lijphart, A. (1999). *Patterns of Democracy: Government Forms and Performance in Thirty-Six Countries.* London: Yale University Press.

Lindblom, C.E. (1959). 'The science of muddling through'. *Public Administration Review*, Vol 19(2), pp.79-88.

Lindblom, C. (1979). 'Still muddling, not yet through,'. *Public Administration Review*, Vol 39(6), pp.517-26.

Mailand, M. and Larsen, T.P. (2018). *Hybrid work: social protection of atypical work in Denmark*. Germany: WSI Institute of Economic and Social Research.

Madsen, P. and Bjørsted, E. (2016). *Et Godt Sikkerhedsnet Skaber Fleksibilitet på Arbejdsmarkedet. Den Danske Flexicurity-Model.* Copenhagen: Arbejderbevægelsens Erhvervsråd.

Masson, P. (2016). 'Emmanuel Macron, Le Vrp d'uber En France'. *L'Humanité*. Available at: https://www.humanite.fr/emmanuel-macron-le-vrp-duber-en-france-598788. (Accessed: 12th April 2019).

Ministry of Employment. (2016). 'Arbejdsgruppe: Selvstændige i dagpengesystemet'. *Beskæftigelsesministeriet*. Available at: https://bm.dk/arbejdsomraader/kommissioner-ekspertudvalg/arbejdsgruppe-selvstaendige-i-dagpengesystemet/om-arbejdsgruppen-selvstaendige-i-dagpengesystemet/.
(Accessed: 3rd March 2019).

Ministry of Employment. (2017a). 'Oversigt over hovedforslag – Arbejdsgruppe: Selvstændige i dagpengesystemet'. *Beskæftigelsesministeriet*. Available at: https://bm.dk/arbejdsomraader/kommissioner-ekspertudvalg/arbejdsgruppe-selvstaendige-i-dagpengesystemet/oversigt-over-hovedforslag/. (Accessed: 3rd March 2019).

Ministry of Employment. (2017b). 'Arbejdsgruppe anbefaler et nyt dagpengesystem for fremtidens arbejdsmarked'. *Regeringen*. Available at: https://www.regeringen.dk/nyheder/arbejdsgruppe-anbefaler-et-nyt-dagpengesystem-for-fremtidens-arbejdsmarked/. (Accessed: 3rd March 2019).

Ministry of Employment. (2019). 'Disruption Council - Partnership for the Future of Denmark'. *Beskæftigelsesministeriet*. Available at: https://bm.dk/arbejdsomraader/aktuelle-fokusomraader/disruptionraadet/. (Accessed: 14th April 2019).

Mohajan, H. (2018). 'Qualitative research methodology in social sciences and related subjects'. *Journal of Economic Development, Environment and People*, Vol 7(1), pp.23-48.

Myles, J. (1984). *Old Age in the Welfare State: The Political Economy of Public Pensions*. Boston: Little Brown.

Neufeind, M., O'Reilly, J. and Ranft, F. (2018). 'Introduction'. in Neufeind, M., O'Reilly, J. and Ranft, F. (eds). *Work in the digital age: challenges of the fourth industrial revolution*. London: Rowman and Littlefield.

Nübler, I. (2016). 'New technologies: A jobless future or golden age of job creation'. *International Labour Office Research Department Working Paper*, 13, pp.22-23.

O'Connor, J. and Olsen, G. (1998). *Power Resources Theory and the Welfare State*. Toronto: University of Toronto Press.

OECD. (2016). *Back to Work – Denmark – Improving the Re-employment Prospects of Displaced Workers.* Paris: OECD.

OECD. (2019). 'Trade Union'. *OECD.stat.* Available at: https://stats.oecd.org/Index.aspx?DataSetCode=TUD. (Accessed: 1st May 2019).

Offe, C. (1984). *Contradictions of the Welfare State.* (eds). Keane, J. London: Hutchinson.

Padamsee, T. (2009). 'Culture in Connection: Re-Contextualizing Ideational Processes in the Analysis of Policy Development'. *Social Politics*, Vol 16(4), pp.413-445.

Palme, J. (1990). *Pension Rights in Welfare Capitalism: The Development of Old-Age Pensions in Eighteen OECD Countries, 1930 to 1985*. Stockholm: Swedish Institute for Social Research.

Pampel, F. and Weiss, J. (1983). "Economic Development, Pension Policies and the Labor Force Participation of Aged Males: A Cross-National Longitudinal Study." *American Journal of Sociology*, Vol 89(3), pp.350–72.

Parsons, C. (2007). *How to Map Arguments in Political Science*. Oxford: Oxford University Press.

Paquette, E. (2017). 'Numérique: les 15 réformes de Macron'. *L'Express*. Available at: https://www.lexpress.fr/actualite/politique/numerique-les-15-re- formes-de-macron_1928518.html. (Accessed: 14th April 2019).

Pickard, J. (2017). ‘David Cameron ‘lobbied on behalf of Uber’ in London’. *The Financial Times*. Available at: https://www.ft.com/content/3c5ebc20-1300-11e7-80f4-13e067d5072c. (Accessed: 12th April 2019).

Pickvance, C. (2005). *The four varieties of comparative analysis: the case of environmental regulation*. Paper for Conference on Small and large-N comparative solutions, University of Sussex, 22-23 September 2005.

Pierson, P. (1993). 'When effect becomes cause: Policy feedback and political change'. *World Politics*, Vol 45(4), pp.595-628.

Pierson, P. (1994). *Dismantling the Welfare state? Reagan, Thatcher, and the politics of retrenchment.* Cambridge: Cambridge University Press.

Pierson, P. (1996). "The new politics of the welfare state". *World Politics*, Vol 48(2), pp.143-179.

Pierson, P. (2000). ‘Increasing returns, path dependence, and the study of politics’. *American Political Science Review*, Vol 94(2), pp.251-267.

Priesler, M. (2018). ‘The Disruption Council explores the future’. *Nordic Labor Journal*. Available at: http://www.nordiclabourjournal.org/i-fokus/in-focus-2018/the-future-of-work/article.2018-05-18.7988978137. (Accessed: 20th April 2019).

Pryor, F. (1968). *Public Expenditures in Communist and Capitalist Nations*. Homewood, IL: Irwin.

Punch, K. (2013). *Introduction to Social Research: Quantitative and Qualitative Approaches*. London: SAGE Publications.

Redder, G. (2016). ‘Danskerne utrygge ved at tage job på nye digitale platforme’. *Ugebrevet A4*. Available at: https://www.ugebreveta4.dk/danskerne-utrygge-ved-at-tage-job-paa-nye-digitale-pl_20632.aspx. (Accessed: 26th February 2019).

Regeringen. (2017). ‘Aftale om nyt dagpengesystem for selvstændige’. Available at: https://www.regeringen.dk/nyheder/nyt-dagpengesystem-for-selvstaendige/. (Accessed 27th February 2019).

Rimlinger, G. (1971). *Welfare Policy and Industrialization in America*, *Germany and Russia*. New York: Wiley.

Russon, M. (2018). ‘Uber gives drivers sick pay and parental leave’. *BBC.* Available at: https://www.bbc.com/news/business-44222594. (Accessed: 14th April 2019).

Samuels, D. (2002). ‘Presidentialized parties: The separation of powers and party organization and behavior’. *Comparative Political Studies*, Vol 35(4), pp.461-483.

Schmidt, V. (2011). 'Reconciling Ideas and Institutions through Discursive Institutionalism'. Chp 2 in Béland, D. and Cox, R. (eds.) *Ideas and Politics in Social Science Research*. New York: Oxford University Press.

Schoukens, P., Barrio, A. and Montebovi, S. (2018). 'The EU social pillar- An answer to the challenge of the social protection of platform workers?' *European Journal of Social Security*, Vol 20(3), pp.219-241.

Schwab, K. (2016). *The Fourth Industrial Revolution*. Geneva: World Economic Forum.

Shead, S. (2016). 'The Deliveroo strike is over as the company abandons plans to force couriers into signing new contracts'. *Business Insider*. Available at: https://www.businessinsider.com/the-deliveroo-strike-is-over-as-the-company-abandons-plans-to-force-couriers-into-signing-new-contracts-2016-8. (Accessed: 5th March 2019).

Simons, H. (2009). *Case study research in practice*. Thousand Oaks: SAGE publications.

Skocpol, T. (1992). *Protecting soldiers and mothers: The politics of social provision in the United States, 1870s-1920s*. Massachusetts: Belknap Press of Harvard University Press.

Smelser, N. (1976). *Comparative methods in the social sciences*. New Jersey: Englewood Cliffs.

Staufenberg, J. (2016). 'Deliveroo courier strike: Employers cannot 'simply opt out of the National Living Wage', says Government'. *The Independent*. Available at: https://www.independent.co.uk/news/business/news/deliveroo-courier-strike-employers-national-living-wage-government-department-for-business-a7189126.html. (Accessed: 5th March 2019).

Steinmo, S. (2008). 'Historical institutionalism'. in D. Della Porta and M. Keating (eds). *Approaches and Methodologies in the Social Sciences: A Pluralist Perspective*. Cambridge: Cambridge University Press.

Stephens, J. (1979). *The Transition from Capitalism to Socialism*. Urbana: University of Illinois Press.

Stewart, H. and Walker, P. (2017). 'Labour and Tories to woo working-class voters with new policies'. *The Guardian.* Available at: https://www.theguardian.com/politics/2017/may/14/labour-and-tories-set-to-woo-working-class-voters-with-new-policies. (Accessed: 15th April 2019).

Strauss, A. and Corbin, J. (2008). *Basics of Qualitative Research: Techniques and Procedures for Developing Grounded Theory* (3rd Ed.). London: SAGE Publications.

Streeck, W. and K. Thelen. (2005). *Beyond Continuity: Institutional Change in Advanced Political Economies*. Oxford: Oxford University Press.

Taylor, M., Marsh, G., Nicol, D. and Broadbent, P. (2017). *The Taylor Review of Modern Working Practices*. UK: The British Government.

Thelen, K. (2003). 'How institutions evolve: Insights from comparative historical analysis'. Chp 6 in Mahoney, J. and Rueschemeyer, D. (eds). *Comparative Historical Analysis in the Social Sciences*. Cambridge: Cambridge University Press.

Thelen, K. and Mahoney, J. (2009). *Explaining Institutional Change*. New York: Cambridge University Press.

Toft, T. (2017). 'Robotter tager også højtuddannedes job – men Akademikerne har ikke fået plads i Lars Løkkes Disruptionråd'. *Infromation.* Available at: https://www.information.dk/indland/2017/05/robotter-tager-ogsaa-hoejtuddannedes-job-akademikerne-faaet-plads-lars-loekkes-disruptionraad. (Accessed 12th March 2019).

Trade Union Congress. (2017a). 'TUC - Risks 808 - 15 July 2017'. *TUC News.* Available at: https://www.tuc.org.uk/news/tuc-risks-808-15-july-2017#_Toc487785884. (Accessed: 15th April 2019).

Trade Union Congress. (2017b). *The Gig is Up: Report.* Tuc.org.uk. Available at: https://www.tuc.org.uk/sites/default/files/the-gig-is-up.pdf. (Accessed: 9 April 2019).

Trenz, H. and Grasso, M. (2018). 'Toward a New Conditionality of Welfare? Reconsidering Solidarity in the Danish Welfare State'. Chp 2 in Lahusen, C. and Grasso, M. (eds). *Solidarity in Europe: Citizens' Responses in Times of Crisis*. London: Palgrave Macmillan.

Tsotsis, A. (2011). 'Uber launches its first international effort in Paris'. *TechCrunch*. Available at: https://techcrunch.com/2011/12/05/uber-launches-its-first-international-efforts-in-paris/. (Accessed: 19th April 2019).

Tynes, S. (1996). *Turning Points in Social Security: From 'Cruel Hoax' to 'Sacred Entitlement'*. Stanford: Stanford University Press.

Unite. (2019). 'Stop Universal Credit Campaign' Unitetheunion.org. Available at: https://unitetheunion.org/campaigns/stop-universal-credit/?fbclid=IwAR03BQQ52d9UqNNaZ43S0fVGT1ofKJ5HyxAZ2w0QMJSk5DfHcPkm24ASouw. (Accessed: 9th April 2019).

Vandaele, K. (2006). 'A report from the homeland of the Ghent system: the relationship between unemployment and trade union membership in Belgium'. *European review of labour and research*, Vol 12(4), pp.647-657.

Weber, E. (2018). 'France: Moving up the digital ranks?'. in Neufeind, M., O'Reilly, J. and Ranft, F. (eds). *Work in the digital age: challenges of the fourth industrial revolution*. Rowman and Littlefield: London.

Wilensky, H. and Lebeaux, C. (1958). *Industrial Society and Social Welfare*. New York: Russell Sage.

Wilensky, H. (1975). *The Welfare State and Equality*. Berkeley: University of California Press.

Wilkinson, D. (2019). 'This is why Deliveroo riders from Manchester went on strike today'. *Mancehster Evening News.* Available at: https://www.manchestereveningnews.co.uk/news/greater-manchester-news/deliveroo-riders-manchester-went-strike-15831561. (Accessed: 15th April 2019).

Wilthagen, T. (2014). 'Thematic Paper – Flexicurity: the way forward. Peer Review on "Flexicurity"', Copenhagen, Denmark, 20–21 November 2014, Mutual Learning Programme, DG Employment, Social Affairs and Inclusion. Luxembourg: Publications Office of the European Union.

Wright, I. (2016). 'Sports Direct workers aren't the only ones unprotected in our 'gig economy''. *The Guardian*. Available at: https://www.theguardian.com/commentisfree/2016/jul/21/gig-economy-workers-sports-direct. (Accessed: 9 April 2019).

Yin, R. (2009). *Case study research: design and methods* (4th ed). Thousand Oaks: SAGE Publications.

Østergaard Jensen, E. (2016). 'Nu melder Uber sig ind i DI – brancheforening raser'. *Berlingske.* Available at: https://www.berlingske.dk/virksomheder/nu-melder-uber-sig-ind-i-di-brancheforening-raser. (Accessed: 1st March 2019).